ACCOUNTABILITY - HOW ARE WE DOING?
THEORY AND PRACTICE IN AID OPERATIONS IN CRISIS AND POST-CRISIS CONTEXTS

Conducted as part of the ‘Learning and Innovating to Improve Crisis Response’ project, with funding from:
GROUPE URD
RELIEF . REHABILITATION . DEVELOPMENT

Founded in 1993, Groupe URD is an independent think tank that specialises in analysing practices and developing policies for the humanitarian sector. Our multi-disciplinary expertise, based on continual field visits to crisis and post-crisis contexts, provides us with insight into the functioning of the sector as a whole. We believe in sharing knowledge and collective learning, and we help aid actors to improve the quality of their programmes.

THE AUTHOR

Lisa Daoud studied Political Science and worked for six years with French NGOs, both in the field and at headquarters. She joined Groupe URD in September 2018 as a Researcher-Evaluator-Trainer specialised in the quality and accountability of aid.

ACKNOWLEDGEMENTS

I would like to thank all those who gave up their precious time to take part in this study: field staff, NGO members and other aid practitioners. Special thanks is due to Aymeric Fuseau, Fabien Cassan, Sophie Mareschal, Nadège Porta and Laurène Barlet who made the study possible thanks to their transparency and commitment. The analysis in this report is the result of discussion, and sometimes even confrontation, which inspired reflection and self-examination. Thank you to Nachly Remarais, Michael Carrier and Véronique de Geoffroy for their useful and constructive feedback. Thank you also to the rest of the Groupe URD team and to the other members of the accountability community of practice for their help and support.

DISCLAIMER

The ideas and analysis in this study are the sole responsibility of the author and do not reflect the points of view of all the participants.

CONTENTS

5/ EXECUTIVE SUMMARY

7/ INTRODUCTION
   Context
   Objective(s) and limits of the study
   Methodology

11/ 1. THEORIES AND APPROACHES
11/ 1.1. Definitions
   1.1.1. The ingredients of accountability
   1.1.2. Links with related topics
14/ 1.2. Reference frameworks and actors
   1.2.1. Existing reference frameworks
   1.2.2. How these reference frameworks are evolving

16/ 2. IMPLEMENTATION CHALLENGES AND PRACTICES
16/ 2.1. Operationalising accountability: the 'A' in MEAL
   2.1.1. The institutional approach to accountability
   2.1.2. Accountability in the field: expectations and actual measures
   2.1.3. Review of field practices: analysis of relevance and good practices
24/ 2.2. Understanding the complexity of barriers
   2.2.1. What does success look like?
   2.2.2. A systemic approach to barriers
   2.2.3. Focus on three major barriers

30/ 3. OBSERVATIONS AND RECOMMENDATIONS

33/ ANNEXES

34/ BIBLIOGRAPHY
Accountability – how are we doing?

**ACRONYMS**

**AAH**: Action Against Hunger  
**AFD**: French Development Agency  
**CwC**: Communication with Communities  
**HAP**: Humanitarian Accountability Partnership  
**HCR**: The United Nations High Commissioner for Refugees  
**HHI**: Harvard Humanitarian Initiative  
**HI**: Handicap International / Humanity & Inclusion  
**IASC**: Inter-Agency Standing Committee  
**ICRC**: International Committee of the Red Cross  
**M&E**: Monitoring and evaluation  
**MEAL**: Monitoring, Evaluation, Accountability and Learning  
**NGO**: Non-governmental organisation  
**NS**: National Society (of the Red Cross)  
**PSEA**: Protection against Sexual Exploitation and Abuse  
**SI**: Solidarités International  
**Tdh - L**: Terre des hommes - Lausanne  
**UN**: United Nations (Nations Unies)  
**UNICEF**: United Nations Children’s Fund  
**WFP**: World Food Programme
EXECUTIVE SUMMARY

The idea of this study emerged when several members of francophone aid NGOs found that they had the same difficulties putting accountability into practice. They therefore felt that it was important to analyse what has become of this multi-faceted concept, which is both omnipresent theoretically, and difficult to grasp in practice.

The first objective of this study was to review the different definitions of the concept of accountability and to analyse its relationship with various related themes (participation, engagement, ‘Do No Harm’, inclusion, safeguarding and protection), which are all major and inter-connected concepts. Rather than provide a new definition and suggest what these links should be, the study describes the sometimes limited appropriation of the principle of accountability by organisations: though there is consensus about using power responsibly, institutional and operational approaches to accountability vary, with approaches based variously on compliance, safeguarding or participation. What purpose does accountability really serve, and who benefits from it?

The analysis of how accountability is institutionalised within four francophone NGOs reveals certain general trends: accountability to affected people is present in strategy documents, but it is not, for the time being, a strategic priority in itself; the term is not used in the same way by different departments within an organisation, and some organisations are more likely to implement measures when there are reputational and financial risks. The consequences of these policies can be seen in the field: complaints mechanisms, which do not always have appropriate communication channels, are the solutions that are observed most often, whereas participatory practices are used less systematically. Rather than being shared with the affected people, the power to make decisions about the budget, targeting or the choice of activities remains in the hands of the aid organisation, and is the basis of its contractual commitments to the donor. Nevertheless, good practices do exist: genuine partnerships with local actors, the co-creation of tools with beneficiaries to disseminate legal frameworks and functional alert mechanisms… Identifying these during this study was not easy, notably because there is no precise idea within each organisation of what successful accountability looks like. Indeed, there is a broad spectrum of ideas, with, at one end, process-based indicators (a mechanism is in place), and at the other, the ambition to radically change the aid system.

What then are the barriers in this particularly complex context? Each case that was analysed had a variety of obstacles at different levels which, when taken together, represent systemic barriers to the ‘accountability and participation revolution’. In order to overcome these, the author argues that we need to move on from the often sterile debate between those who argue that aid should become more technical and those who argue in favour of ‘common sense’. Instead we need to focus on the areas where aid has become more complex and bureaucratic: reporting, financial and administrative audits, responding to calls for proposals and counting beneficiaries are all tasks that require expertise whereas the ‘interpersonal maturity’ needed to manage the complex relations with affected people and local actors is neither promoted nor supported.

The study also makes a number of observations and recommendations in order to overcome these barriers and move forward on this issue:

→ Organisations need to establish better understanding of the different themes related to accountability in order to avoid unclear use of the term and reduce the risk that it is interpreted to the advantage of donors;
→ More effort is needed to marry accountability to affected people and the type of management adopted by organisations, particularly on the part of management teams;
→ Current approaches to accountability within organisations and in the field do not make it possible to overcome systemic barriers that are sometimes deeply rooted in the practices of individuals and affected people: good practices exist already but the relevant systems still need to be created;
→ We should move on from the debate between technical demands and ‘common sense’ to propose realistic alternatives to the operational methods of the aid sector, notably to re-engage with the issue of interpersonal maturity;
Accountability – how are we doing?

The study encourages donors and NGO management to take bold initiatives to improve accountability to affected people.

Finally, the second objective of the study was to provide an updated overview of the complex issue of accountability. The following issues raised in this study deserve to be explored in more depth:

- Studying the link between internal management and accountability, and particularly, how the use, or non-use, of participatory management practices, affects the interaction between staff and affected people;
- Identifying and studying good practices via case studies to underline the characteristics of successful experiences;
- Defining appropriate and useful accountability and participation indicators for project steering;
- Exploring the link between inclusion and accountability;
- Encouraging and giving priority to participatory research.
INTRODUCTION

Context

This review was carried out by Groupe URD in connection with a practice-sharing group involving several non-governmental organisations: Action contre la faim (ACF-France); Handicap International / Humanity & Inclusion (HI); Solidarités International (SI) and Terre des hommes - Lausanne (Tdh-L). It was funded by the French Development Agency, Monaco’s Department for International Cooperation and the Fondation de France as part of the ‘Learning and innovating to improve crisis response’ project. The ideas presented here were developed in collaboration with the MEAL/Quality experts from the participating NGOs (except Tdh-L whose expert is in Emergency Response and Risk Management). They do not necessarily reflect all the viewpoints held within these organisations.

WHY THIS REVIEW?

→ Pressure for greater accountability towards affected people...

There is a consensus today about the importance of accountability, even though there is no clear definition of what this term means exactly (see below). This growing awareness can be seen within organisations (where special departments have been created) and among donors (where accountability is a condition of funding), and is also more and more evident within the sector as a whole. Nevertheless, a study carried out in 2016 in preparation for the World Humanitarian Summit (WHS) 1 revealed that aid beneficiaries felt that they were not sufficiently informed or listened to. In 2017, new studies carried out by Ground Truth Solutions2 in six countries (Iraq, Haiti, Afghanistan, Lebanon, Uganda and Somalia) confirmed that, in general, beneficiaries of international aid thought that their opinions were not taken into account enough and that the aid delivered was of insufficient quantity and quality. Since then, there have been more and more initiatives aiming to allow people’s voices to be heard and pressure has grown to establish shared and inter-organisational complaints and feedback mechanisms.

→ … but confusion about the term ‘accountability’

Aid organisations are unclear about the terms and responsibilities related to accountability: audit vs. quality department; control tools vs. communication and participation tools. In the words of Paul Knox Clarke, the word accountability has become, “a catch-all for a host of different problems and activities: the participation of affected people in decision making; communication with ‘beneficiaries’; feedback on programme quality; prevention of sexual exploitation – all get bundled together into a single muddy and muddled idea”. In a Francophone context, it is also important to remember that the term is not easily translated into French, which can create even more confusion.

→ Accountable to who?

One of the factors that affects the implementation of accountability is related to the term itself. We are always accountable to someone (including ourselves) for something. In the aid sector, there is an added difficulty: the co-existence of several accountability systems (taxpayers, governments, public donors, private donors, project staff,
partners and populations). This co-existence is not a problem as long as these actors express similar needs and priorities, but this is rarely the case. And when their interests diverge, the voice of the final beneficiaries rarely comes out on top. Jean-Michel Severino and Olivier Ray call this phenomenon “the syndrome of diverging accountabilities” and they believe that it is unrealistic to expect that these should spontaneously converge.

The difficulty of putting accountability into practice in the field

For all the reasons mentioned above, applying the principles of accountability in the field is no easy task. Though organisations seem to be more conscious of the issues at stake and keen to apply these principles, accountability measures often remain incomplete and poorly understood, or are just empty shells. By way of example, there are more and more complaints mechanisms but there continues to be distrust between beneficiaries and aid organisations. As pointed out by Vikrant Mahajan in 2016 and Nick van Praag in 2018, control and risk transfer mechanisms that aim to limit abuse are becoming more widespread to the detriment of more positive actions to increase trust and participation.

Objective(s) and limits of the study

This study was undertaken following a request by a number of Francophone NGOs from the aid sector: Action contre la faim (ACF-France); Handicap International / Humanity & Inclusion (HI); Solidarités International (SI); and Terre des hommes - Lausanne (TdH - L)) to conduct a review of the notion of accountability from both a conceptual and operational point of view, and particularly from the perspective of those involved in Monitoring, Evaluation, Accountability and Learning (MEAL) and risk management. It complements the numerous publications that appeared in 2018 on this subject, focusing more specifically on field practices and mechanisms. The analysis was made possible thanks to the transparent sharing of documents by these NGOs. Examples of good practices by non-francophone NGOs were also investigated; these are presented in boxes in conjunction with the observations of the study as potential sources of inspiration.

The aim of this document is to study what accountability refers to today in crisis, reconstruction and development contexts. Its aim is to facilitate discussion and the development of support materials to help achieve accountability in the field. More broadly, it aims to contribute to increasing quality within the humanitarian ecosystem, particularly by highlighting the variety of initiatives that exist and the obstacles to be overcome in the field. It is neither a position paper, nor a practical guide.

What kind of accountability are we talking about here?

This study focuses on accountability towards crisis-affected people; this is considered to be of central importance, ethically, in delivering aid. However, this should not obscure the importance of accountability towards other stakeholders, particularly towards national and local institutions and civil society organisations, particularly as greater involvement on their part often improves the assistance provided to the population.

Who is this document aimed at?

- Those in charge of Quality/Accountability/MEAL (Monitoring, Evaluation, Accountability and Learning);

---

6 Respectivement Directeur de Sphere Inde en 2016 et fondateur de Ground Truth Solutions.
8 Notamment le Humanitarian Accountability Report de 2018 du CHS Alliance, le rapport de IARAN From Voice to Choices et les divers travaux de Ground Truth Solutions.
Accountability – how are we doing?

- Operational and technical staff;
- Other people in charge of accountability internally (e.g. audit, risk management, ‘compliance’ departments);
- Organisation and mission decision-makers / managers;
- Donors (including the technical teams in charge of accountability);
- More widely, anyone involved in the implementation of humanitarian or development programmes.

Fields of inquiry - key questions

- Why is there increasing pressure for more accountability in crisis response and what form does it take?
- What are the key components of the definition of accountability? What links are there with related notions (transparency, the ‘Do No Harm’ principle, participation, etc.)?
- What are the current policies, trends, actors and recommendations that directly or indirectly structure/influence aid operations in crisis contexts on this subject?
- What does the ‘A’ in MEAL (Monitoring, Evaluation, Accountability and Learning) mean for an aid project in a crisis context? And how does the ‘A’ combine with M, E and L?
- What accountability ‘activities’ are implemented in the field? What difficulties exist?
- What are the differences between short- and long-term projects in terms of the challenges and practices involved in implementing accountability in the field?
- What issues and interesting initiatives should be analysed in greater depth?

Methodology

The following methodology was used:

- Literature review: existing reports, reference frameworks, standard definitions in the sector and those used by certain NGOs[^1], internal analysis documents (e.g. Quality self-analysis results).
- Individual interviews and collective workshops:
  - 2-3 interviews per organisation with coordination or MEAL/Quality staff;
  - Two collective workshops with the MEAL/Quality focal points from these organisations (and a risk management focal point from Tdh-L) (26 October 2018 and 1 February 2019) and an individual interview with each focal point;
  - Complementary interviews with key accountability actors and MEAL staff from other organisations;
  - Quantitative survey conducted with all the country offices of the four NGOs (51 respondents);
  - Discussion workshop between Groupe URD, MEAL focal points and the French Development Agency (to come).

The following limits should be taken into account:

- The time attributed to this study was limited and no dedicated field visit was planned to triangulate the information from the field interviews;
- The analysis is not exhaustive: this was carried out with a few existing NGOs, and within these, primarily with the MEAL/Quality/Risk management focal points (the 4 participating NGOs and a few other organisations to put the findings into perspective). The views of donors, local actors, and associations who defend the rights of affected people were not directly taken into account, but this could be an interesting topic for a follow-up study;

[^1]: Une analyse approfondie a été faite sur les ONG ACF, HI, SI et Tdh-L. Elle a été complétée par une revue rapide des définitions utilisées par DRC, ECHO, NRC, la FIDH et le CICR, OCHA, UNICEF et World Vision.
Accountability – how are we doing?

- The author was able to investigate the different practices adopted by operators and the difficulties that they face, but it was only possible to cover certain subjects sufficiently deeply. As a result, the ability to make generalisations about the participating NGOs is limited.

The aim of this study is to provide updated guidelines on the complex subject of accountability, but it also proposes areas for further reflection on the points that have emerged.
1. THEORIES AND APPROACHES

1.1 Definitions

THE DIFFERENT COMPONENTS OF ACCOUNTABILITY

As mentioned in the Humanitarian Accountability Report 2018\(^1\), definitions of accountability and its related terms vary depending on organisations. There are two main definitions in the sector:

- The Inter-Agency Standing Committee, via the IASC Task Team on Accountability to Affected Populations and Protection from Sexual Exploitation and Abuse (AAP/PSEA)\(^2\) (AAP Framework, 2012) provides the following definition:

  Accountability to affected populations is an active commitment to use power responsibly by taking account of, giving account to, and being held to account by the people humanitarian organisations seek to assist.

- The Core Humanitarian Standard\(^3\) (2015) uses this definition:

  Accountability: the process of using power responsibly, taking account of, and being held accountable by, different stakeholders, and primarily those who are affected by the exercise of such power.

In order to understand how accountability is viewed by organisations, definitions from different actors (donors, NGOs and the UN) were compared\(^4\). The definitions alone were analysed (not the details given in the different methodological frameworks), as it was considered that they were meaningful in themselves. The following diagram highlights the similarities and differences between these definitions, based on their main characteristics:

\[^{1}https://www.chsalliance.org/har\]
\[^{2}Accountability to Affected Populations / Protection against Sexual Exploitation and Abuse\]
\[^{3}Core Humanitarian Standards (https://corehumanitarianstandard.org/the-standard)\]
\[^{4}The additional NGOs (other than the participating NGOs) were chosen because of the similarity of their operating methods in relation to the four NGOs. It was not an exhaustive selection.\]
The common denominator between the different definitions is an ethical approach based on the idea that the power given to aid organisations needs to be used responsibly. The other aspect most frequently included in definitions of accountability is reporting, in the accounting sense of the term, and in particular for the purpose of compliance with donor requirements and, to a lesser extent, with administrations in the countries where operations take place.

This may be explained by the fact that ‘accountability’ in English predates the use of the term in French, and its root, ‘account’, is related to an accounting approach. The ‘safeguarding’ approach, that is to say protection against all forms of non-respect of the code of conduct, is more recent, and, as such, is less present, at least in the definitions. Finally, there are notable differences regarding the ‘participation’ approach which can take very different forms, reflecting different degrees of participation. These can range from simply providing stakeholders with information and taking their views into account, to active communication and participation, to ‘empowerment’ (which can have several meanings in French, such as ‘to make more autonomous’, ‘to emancipate’ or ‘to make more responsible’).

The definitions are generally based on principles (e.g. transparency) or key actions (e.g. information), and it is rare that they include an objective or a vision. What is more, the use of certain aspects of accountability, to the detriment of a more comprehensive understanding of the concept, is not insignificant: it is common for the term accountability to be used for different reasons by members of organisations. One of the people who was interviewed during this study said that there was ‘confusion in the use of terms’ within their headquarters, and that ‘accountability’ is mainly understood to mean the act of reporting to the different stakeholders, and primarily from the field to the headquarters and the donors. This contributes to a lack of clarity with regard to roles and responsibilities, as developed in chapter 2.

What terms are used to describe accountability in the majority of francophone NGOs?

Five terms are currently used a great deal:

Accountability to or compliance with donors: often prioritised within organisations, accountability to donors (commonly known as ‘donor accountability’) refers to the exercise of reporting to those who have funded a project. The related term ‘compliance’ describes the alignment of internal rules (finances, human resources, logistics and programmes) with those of funding agencies. It is important to point out that many organisations have adopted internal rules that are stricter than those of funding agencies. If this is the case, compliance applies to headquarters and country offices respecting the internal rules.

Accountability to Affected Populations: for certain actors, the term ‘accountability to affected populations’, which was popularised by the IASC, should be the general (umbrella) term. Though a significant proportion of actors have chosen this version, notably because it does not refer to accountability to donors, not everyone is convinced, some feeling that it lacks a reference to partners and the authorities and that it does not represent any significant progress in terms of participation in decision-making.

Communication with Communities: this term is used in the field for the creation of multi-actor working groups...
When we talk about accountability in the field, several notions emerge: protection (and notably Protection against Sexual Exploitation and Abuse - PSEA), the 'Do No Harm' principle, inclusion, and non-discrimination. Within the participating organisations, there is some fluidity between the terms, the distinction between them somewhat unclear and changing depending on the point of view of individuals and organisations. During work sessions organised for this study, it proved to be impossible to establish a diagram representing the links between the topics related to the notion of accountability, both in terms of definitions and the strategic aspect of certain links. Are inclusion and accountability synonyms? Does the 'Do No Harm' principle include accountability or is it a part of accountability? What about non-discrimination? The cross-cutting and multi-actor nature of accountability is clear and it seems that the term evokes, or even 'obscures' central notions (such as PSEA, 'Do No Harm', participation, etc.) that require visibility and an operationalisation strategy of their own. What is more, without clarification, there is a major risk that accountability to donors will be given priority over accountability to affected people, institutions, and national and local actors.

**LINKS WITH RELATED TOPICS**

When we talk about accountability in the field, several notions emerge: protection (and notably Protection against Sexual Exploitation and Abuse - PSEA), the 'Do No Harm' principle, inclusion, and non-discrimination. Within the participating organisations, there is some fluidity between the terms, the distinction between them somewhat unclear and changing depending on the point of view of individuals and organisations. During work sessions organised for this study, it proved to be impossible to establish a diagram representing the links between the topics related to the notion of accountability, both in terms of definitions and the strategic aspect of certain links. Are inclusion and accountability synonyms? Does the 'Do No Harm' principle include accountability or is it a part of accountability? What about non-discrimination? The cross-cutting and multi-actor nature of accountability is clear and it seems that the term evokes, or even 'obscures' central notions (such as PSEA, 'Do No Harm', participation, etc.) that require visibility and an operationalisation strategy of their own. What is more, without clarification, there is a major risk that accountability to donors will be given priority over accountability to affected people, institutions, and national and local actors.

---

16 The Red Cross and Red Crescent Guide to Community Engagement and Accountability deals with participation, providing information, behaviour and social change and evidence-based advocacy.
19 https://www.urd.org/fr/publications/Livres/article/le-manuel-de-la-participation
22 There is some ambiguity with the term Duty of Care.
23 Humanitarian Accountability Report 2018
1.2 Reference frameworks and actors

**EXISTING REFERENCE FRAMEWORKS**

In the course of the study, the following reference frameworks were listed:

- **Case studies and lesson sharing**: CDAC Learning Reviews (2018 - Africa, Hurricane Maria, Bangladesh, etc.).
- **Operational training**: Communication and community engagement, particularly in emergencies (CDAC). HAP training courses do not seem to have been replaced and nothing similar appears to be available. E-learning accountability modules have been developed in certain organisations, such as ACF France.
- **Communities of practice**: IASC Taskforce AAP/PSEA, International Council of Voluntary Agencies (ICVA, particularly for safeguarding issues), CDAC, Francophone NGO Accountability Group (self-organised and facilitated by Groupe URD) and Keeping Children Safe.

**TRENDS IN THE WAY THESE REFERENCE FRAMEWORKS ARE EVOLVING**

**More joint or integrated mechanisms**

In terms of managing complaints, it appears that the debates over the last two years about accountability have oriented this towards collective management: joint or integrated mechanisms that allow people to address a single entity or a single organisation if they have any suggestions or they want to report violations of the code of conduct, thus avoiding communication gaps. This objective is, for example, one of the IASC’s strategic development areas with regard to accountability: it encourages tools that are created by affected people and the use of feedback and complaints mechanisms that are pragmatic and shared by the different organisations in a given context. The interviews carried out for this study showed that this vision is not shared by everyone among the members of the participating organisations. Some are concerned about confidentiality and how these mechanisms will be put into practice.

**Safeguarding measures encouraged by DFID**

In 2003, a bulletin by the Secretary General of the United Nations established a PSEA framework, followed in 2016 by Minimum Operating Standards. Since the summer of 2018, the British Parliament has been aiming to accelerate reforms to improve safeguarding in the aid sector. In the autumn of the same year, measures were presented to NGOs, or were re-presented to those already involved in 2003. Among the most significant measures is an appeal to adopt a ‘zero tolerance’ policy, a call to report all non-compliance with the code of conduct (or even rumours) immediately, the introduction of a humanitarian passport, the improvement of background checks and the creation of an International Aid Sector Ombudsman. Core Humanitarian Standard certification is also encouraged.

---

24 This complements the extensive review of accountability frameworks and actors carried out by HAP 2018 (see the different timelines).
25 https://interagencystandingcommittee.org/accountability-affected-populations-including-protection-sexual-exploitation-and-abuse/content-1
Grand Bargain: frustration in relation to 'participation' and 'localisation'  
The 'participation revolution' has not taken place: the last two years have seen this message clearly stated and displayed at the forefront of the World Humanitarian Summit and the Grand Bargain\(^{26}\). Our interviews showed that there is some frustration today in the sector, while certain actors, particularly in international forums, no longer understand why accountability and participation are not being put into practice. Working groups have been established to analyse the barriers that exist and to identify good practices\(^{27}\). Discussions about accountability are also linked to the topic of localisation\(^{28}\), which includes the notion of power and its use. The nature of discussions about localisation show that localisation and accountability could go hand in hand: if organisations “from the North” do not become accountable of their own accord, it will be imposed by local actors who want the ability to take action to be shared\(^{29}\).

Enough standards, procedures, guides and tools, not enough operationalisation  
The conclusions of the IASC\(^{30}\), of HAR 2018 and the joint report by the ICRC and the Harvard Humanitarian Initiative (HHI) of February 2018\(^{31}\) are similar: “The many frameworks, processes, mechanisms, guidelines and initiatives have not dealt with changing the power dynamics and governance structures in the humanitarian system to truly enable affected people to have a real voice and choice.”\(^{32}\).

The sector would therefore appear to have enough procedures, documents and standards related to accountability, but change is slow in the field. Peter Maurer, the current President of the ICRC, adds, “I see a potential danger that “Accountability to Affected People” becomes a dogma, implemented as a new standard operating procedure rather than opening up our work and helping us to become more agile and flexible. While it would be no one’s intention for this to happen, the worst case would be that “AAP” becomes a bureaucratic system where boxes are ticked but nothing really changes.”\(^{33}\).

---

\(^{26}\) SCHR, Peer Review on Participation: reports of findings, Background Document for Conference : Participation is Power: Keep it, Share it or Give it away, 2017.

\(^{27}\) OCHA is currently coordinating the drafting of case studies.

\(^{28}\) Localisation does not have a standard definition in the sector. Here it refers to the commitment made at the last World Humanitarian Summit for aid that is ‘as local as possible, as international as necessary’.


\(^{30}\) Interview with Tanya Axisa.


\(^{32}\) HAR 2018.

2. IMPLEMENTATION CHALLENGES AND PRACTICES

In this second section, we will look in greater detail at how the four participating NGOs (Action contre la faim, Handicap International / Humanity & Inclusion, Solidarités International and Terre des hommes) approach accountability. We will consider the institutional approach, what is actually done in practice and the barriers that exist, from a MEAL perspective, which is the strategy that three of the organisations being studied have adopted to put accountability into practice.

2.1 Operationalising accountability: the ‘A’ in MEAL

THE INSTITUTIONAL APPROACH TO ACCOUNTABILITY

The four organisations have integrated the term of accountability into their strategies and the way they function. The following trends were observed (for more information about how each organisation is structured, see annex 1):

- In looking at how accountability is integrated into how the organisations function, it appears that it has not been institutionalised as a strategic area in itself. Thus, accountability is not "a key focus of discussions" and the decision to "officially institutionalise" it is not clearly identified. As a result, there is a feeling of lack of internal coherence ("each department takes up a part of accountability, but it is not coordinated" and "the level of understanding [of the term] is relatively weak").

- Often, several documents within an organisation mention accountability to affected people, with a variety of definitions: accountability is as much a general quality criterion (of participation, of MEAL), a minimum requirement of the MEAL system (prevention, information, complaints and feedback mechanism) or an intervention principle in the operational frameworks. The explanation for this situation is as much the lack of shared understanding (partly linked to the term itself, as seen above) as it is the competition between different agendas between different departments (donor compliance, risks, quality) which leads to a utilitarian approach to accountability and participation.

- Setting up complaints mechanisms often seems to be a priority for organisations. This has become all the more important for some since the Oxfam scandal, whereas others have integrated safeguarding for a long time (particularly in terms of child protection). One of the members interviewed explained, for example, that they had added the theme of beneficiary feedback to the complaints mechanisms that were being encouraged by management after the Oxfam scandal. An additional driver is the fact that complaints mechanisms are concrete and operational and can therefore be easily shown to donors (accountability of compliance). It is therefore natural within the participating NGOs that the drafting of strategies and the implementation efforts that have had the most success concern this aspect. Certain MEAL focal points were aware of the risk of limiting accountability to complaints mechanisms.

- The general trend consists of developing a large number of tools and methods to put accountability into practice rather than accompanying a change in culture. During an interview, a focal point raised the

---

34 In this paragraph, the quotes are from the semi-structured interviews conducted with the MEAL and Quality focal points from the participating organisations.
Accountability – how are we doing?

following question: “Have we made things more complex? Do we lose sight of the purpose when we establish accountability systems in the field?” Whereas being accountable should combine positioning and practices, methods and tools may make processes more bureaucratic (as certain actors in the field feel). Despite this, some of the individuals interviewed are positive about these methods and tools which help them in their functions by clarifying rules.

• The feeling that processes are becoming more bureaucratic is reinforced by the small number of lesson learning exercises that show the relevance and the sustainability of existing systems. Current institutionalisation strategies do not make it possible to monitor progress made on accountability, nor to know what works, nor to identify points to be explored.

External inspiration: integrating accountability as a cross-cutting issue at headquarters

At TROCAIRE, it is the humanitarian department who was behind the initiative to introduce quality and accountability standards, and the rest of the organisation quickly followed. This was largely due to what Anglophones call a ‘champion’, that is to say, a passionate individual who worked with a steering group in order to explore the challenges of accountability for the organisation. Accountability to affected people was included in the strategic plan as a specific objective. In order to measure the progress made, the organisation decided to adopt the Core Humanitarian Standard’s verification process. In 2018, the following aspects were put into practice: CHS self-assessment, identification of weaknesses, reinforced deployment of policies and training in managing feedback and complaints, and reinforced deployment of training on mainstreaming protection. An accountability steering committee was also created to guide efforts and monitor progress 4 times a year. An accountability focal point coordinates these meetings (30% of a full-time contract), and the rest of the members come from the different departments at the headquarters.

ACCOUNTABILITY IN THE FIELD: EXPECTATIONS AND ACTUAL MEASURES

In order to study the operationalisation of accountability in the field, an online quantitative survey was sent to the country offices of the participating NGOs. 51 people from 51 different country offices replied, located in 34 countries and 2 regional offices. In addition, the standard job profiles of each organisation were analysed, and eleven semi-structured interviews were carried out.

Accountability frameworks in the field

75% of those who responded to the online survey said that they based their approach to accountability on a framework established at the country office level. However, there is no consensus about the definition of an accountability framework. Depending on the interlocutor, it can be a project proposal, a logical framework, a procedure, a strategy document or a methodological guide.

As we saw above, none of the four participating NGOs has a dedicated accountability reference framework, but accountability is mentioned in quality, operational and strategic frameworks. None of the respondents said that the lack of internal (or external) norms or standards was a barrier.

Who is responsible for accountability?

One of the ways that the participating NGOs have institutionalised accountability is the creation of dedicated roles in the field. These roles vary depending on whether the organisation adopts a MEAL (Monitoring, Evaluation, Accountability and Learning) approach or a Quality and Accountability approach. The latter is different in that it considers monitoring and evaluation to be at the service of Quality and Accountability, in a hierarchical relationship that is less present in a MEAL approach. The theme of accountability is found in job titles (e.g. MEAL Coordinator),

35 Source : entretien
Accountability – how are we doing?

or in the objectives attributed to jobs (e.g. for Monitoring and Evaluation positions). The job profiles of different functions have been standardised and include: establishing or contributing to the quality and accountability strategy of the country office, accompanying staff, integrating cross-cutting issues (gender, equality, 'Do No Harm') and sometimes work on staff culture and positioning. Complaints and feedback mechanisms are established either by the MEAL team, or the safeguarding focal point. One organisation is testing a role in a few countries that is responsible for both the MEAL team and safeguarding. The tendency is to have more senior MEAL positions (coordinator or manager) who are responsible for designing the systems. Though the MEAL approach seems to be the most common, the field staff mentioned different job titles for those who were in charge of accountability: internal controller, compliance manager, database manager… Only 6 offices out of 51 have no one who is specifically in charge of accountability. What is more, 12% of the offices interviewed mentioned that they were working with local organisations (mainly community-based organisations) who are specialised in accountability.

Graph 1: Data from an online survey completed by 51 country offices in October - November 2018

The aspirations of field staff in terms of accountability

Eleven people (Coordinators, MEAL and M&E Managers and Protection Coordinators) were interviewed in greater detail about the expectations of the office and the organisation in terms of accountability. The expectations listed are varied and sometimes unclear, each person interviewed having described two or three expectations.

Donor accountability:

- Making sure that we reach our targets (monitoring), particularly quantitative targets;
- Making sure that reporting is of high quality;
- Regularly reporting on the progress made on the project, expenses and disbursements;
- Making sure that the programmes are visible.

Accountability to affected people:

- Making sure that we are impartial, independent and neutral;
- Making sure that we use a participatory approach;
- Making sure that protection problems are taken into account (perceived confusion between 'protection' and 'safeguarding');
- Setting up complaints and suggestions mechanisms, helping to run them;
- Promoting the 'fundamental principles' of accountability;
- Making sure that the key stakeholders take part in designing the project and in the mid-term reviews.

Accountability to staff:

- Maintaining motivation so that staff know why they are working.

According to certain 'MEAL' focal points, the expectations are not in keeping with the level of responsibility that is given: according to them, accountability corresponds more to a general state (to be accountable as an individual,
Accountability – how are we doing?

A team and an organisation rather than a technical objective, it should be promoted at the highest level of the organisation. Another MEAL focal point said that he found it “difficult to understand what accountability consisted of as it is supposed to be everyone’s responsibility”. It would also seem that, depending on the size of the country office, the number of staff involved or the nature of its programmes, expectations are understood very differently: the priority often seems to be donor accountability (and therefore financial and administrative reporting, and the measuring of local framework indicators), but also sometimes supporting project steering (accountability associated with monitoring and evaluation), or the establishment of complaints and feedback mechanisms, and participatory approaches (accountability understood to be at the heart of a rights-based approach). In all these cases, the articulation between the 4 letters of MEAL is not obvious for staff and can give the impression that accountability is the responsibility of one member of the team.

**Review of Field Practices: Analysis of Relevance and Good Practices**

**Accountability approaches and mechanisms**

Participatory approaches (apart from simple information and consultation exercises) vary from one office to another (and sometimes from one programme to another), amongst which the most noteworthy are: the conducting of group or individual interviews during initial assessments, the use of socio-anthropological studies to understand societies, the collective definition of beneficiary selection criteria, collective beneficiary selection, capacity building workshops with beneficiaries and advocacy carried out by beneficiaries (for example children).

67% of the offices interviewed (35) have a complaints and feedback mechanism in place, and 4 are currently being set up. These offices are equally present in crisis contexts and post-crisis/development contexts. 20% of the offices interviewed have a joint feedback/complaints mechanism (HRC, WFP, UNICEF, local NGOs, etc.). Among the offices with a mechanism, the large majority have more than one communication channel with affected people and other stakeholders. The most common channels are relatively formal: suggestion boxes and hotlines.

![Proportion of feedback/complaint channels implemented](image)

**Figure 2: Data from an online survey completed by 51 country offices in October-November 2018**

**Relevance of the mechanisms and main channels put in place**

Though good practices exist (see further down in this section), as an aspect of accountability, participatory
approaches are not entirely satisfactory for the majority of the respondents (an average of 5.6 out of 10). Understanding of accountability and the way that it is put into practice is sometimes limited to a utilitarian approach which tends to lead to the following problems:

1. Sector-based needs assessments with key informant interviews (triangulated to a greater or lesser degree) are sometimes used as short-cuts to accountability; 
2. One-way communication about the project with part of the population; 
3. Quantitative surveys to be included in internal and donor reports, sometimes complemented with focus group discussions carried out in a rushed and inappropriate manner (e.g. a large number of closed questions that do not allow any real interaction or points of view to be explored, the people who are interviewed are chosen solely because they are available); 
4. Evaluation results that are used primarily for donor accountability and partially for learning.

Another weakness of the implementation of activities, for example during distributions, seems to be the targeting of beneficiaries. As mentioned in the Quality self-assessment conducted by one of the country offices for this study, sometimes the most vulnerable and marginalised people are not selected. This seems to indicate that there are difficulties in understanding vulnerability, finding the most relevant selection methods and criteria, and providing some people with a minimum level of transparency, or allowing them to take part actively in decision-making.

Outline: The practices of Red Cross and Red Crescent National Societies in Africa

Mapping the community engagement and accountability practices of African National Societies and partner National Societies showed that one-way communication is more common than participatory practices in the field. The most common practices are: consulting communities during initial assessments; explaining who we are and what we are doing in this programme; using evaluation results to guide future programmes. The less common practices are: sharing evaluation results with affected people; using feedback, complaints and monitoring data systematically to improve programmes; having an effective system for collecting feedback and complaints.

The complaints and feedback mechanisms that are put in place do not allow a systematic response to be given to those who make the complaints/requests (average of 6.2 out of 10). According to a respondent, “the complaints about quality are more difficult because there are not enough people to follow up individuals and provide a response about specific complaints, so the response is often given to the community representatives.” The mechanisms are nevertheless perceived to be relatively useful for the MEAL or programme team (average of 7.3 out of 10). When these functions, “these mechanisms or methodologies give staff insight into beneficiaries’ experiences so that they can re-orient their activities and communicate about the impacts of the project”. However, this needs to be qualified by the tendency to use formal communication channels (boxes and telephone lines). One respondent stated: “We receive very few sensitive complaints, and when we do, it is during field visits, face-to-face. People do not use the formal systems to contact us. It is not their way of doing things.”

Focus on the two main channels:

→ Suggestion boxes

Though suggestion boxes are put in place the most frequently, only two offices said that they were the channels

---

36 In the survey questionnaire, the respondents were asked to rate three issues between 1 and 10: their satisfaction with regard to the participatory character of their activities, the systematic responses provided to people expressing dissatisfaction (see results p.21) and the way that the feedback and complaints mechanism is used (see results p.21).
38 Document partagé par la référente FICR redevabilité et engagement communautaire Afrique durant l’étude.
39 Voir méthodologie en note de bas de page 35.
that were used the most. In one case, the boxes are used in conjunction with a community-based committee that processes the letters that are received, providing an opportunity for dialogue that is appreciated by staff. In another, the contents of the boxes are only gone through at the end of the intervention cycle of the Rapid Response Mechanism and it is difficult to use them for learning and agility.

<table>
<thead>
<tr>
<th>Types of use</th>
<th>Reporting violations of the code of conduct</th>
<th>One-way information and referral</th>
<th>Correcting a project during the implementation</th>
<th>The participation of affected people in decision-making</th>
</tr>
</thead>
<tbody>
<tr>
<td>Remarks about the relevance of using a suggestion box</td>
<td>Relevant but confidentiality can be difficult to guarantee</td>
<td>Limited because it can take a long time to open and respond</td>
<td>Limited because it can take a long time to open and respond</td>
<td>Very limited, requires the involvement of a mixed committee</td>
</tr>
</tbody>
</table>

→ Hotlines

Though half of the offices interviewed who have set up hotlines say that they receive complaints, they often appear to be used for referencing (or for technical assistance in the case of cash transfers). Access problems are sometimes caused by unstable telephone networks, or due to the fact that people often change number. One respondent also mentioned beneficiaries’ lack of trust in this mechanism.

<table>
<thead>
<tr>
<th>Types of use</th>
<th>Reporting violations of the code of conduct</th>
<th>One-way information and referral</th>
<th>Correcting the programme during implementation</th>
<th>The participation of affected people in decision-making</th>
</tr>
</thead>
<tbody>
<tr>
<td>Remarks on the relevance of using a hotline</td>
<td>Relevant only if there is a sufficient level of trust and the system is confidential</td>
<td>Relevant as it provides rapid access to staff</td>
<td>Relevant as it provides rapid access to staff</td>
<td>Very limited relevance</td>
</tr>
</tbody>
</table>

As a result, it seems necessary to rethink the use and combination of communication channels, and particularly to prioritise face-to-face dialogue when possible, also in order to reach all different types of people (women, children, and people with specific needs). The recent work done by the Bangladeshi working group on Communication with Communities\(^40\) is fully in keeping with this - they encourage the use of help offices (with recording devices \(^41\)) in strategic locations and visits in person, and they discourage boxes and hotlines because they are not trusted enough. In addition, with regard to boxes, writing is not appropriate for oral languages such as Rohingya.

---

External inspiration: improving the interaction between humanitarian staff and beneficiaries thanks to translation in Bangladesh

Translators without borders have been working on the Rohingya crisis since October 2017. In a consortium with Internews (who have, amongst other things, written a manifesto for greater accountability in this crisis) and BBC Media Action, Translators without Borders support the working group on Communication with Communities and a few operational organisations to improve the way linguistic barriers are taken into account in the response.

\(^{40}\) [https://www.internews.org/updates/increased-communication-still-critical-rohingya-refugees](https://www.internews.org/updates/increased-communication-still-critical-rohingya-refugees)

\(^{41}\) According to Irene Scott of Translators without Borders, recording devices are the ideal tool as they allow focal points to transcribe precisely what they have been told. However, this takes a considerable amount of time and is not always possible.
Their first report shows that the Rohingya dialect is very different to classic Bengali, but is 70% similar to the Chittagong dialect. As for Burmese, which has been chosen as the official language of the response, fewer than 20% of those who have recently been displaced can read it. In general, language is identified as a major barrier to relations between humanitarian staff and the population. As a result, the consortium helps staff who receive complaints or feedback to rewrite and translate them into the reporting language (very often English). An offline application, including a glossary of key words specific to the humanitarian sector (including the 6 basic principles of the PSEA) has also been developed and there is a training course for interpreters.

**Good practices described by the members of the participating NGOs**

This section lists a certain number of good practices related to accountability that were mentioned during the interviews. Depending on the person interviewed, the examples chosen gave either satisfactory or unexpected results in terms of accountability.

**Feedback and complaints mechanisms**

**Successive iterations in establishing complaints booths with follow-up calls**

In DRC, a MEAL focal point at Solidarités International was struggling to find a relevant and effective system to maintain dialogue with people from the numerous isolated villages targeted by the organisation in connection with its agricultural support activities. Complaints boxes on their own did not work, and the population had limited access to the telephone network. The MEAL focal point tried several systems and gave priority to reinforcing her teams’ skills during the iterations, and particularly their capacity to formulate useful recommendations. In the end, the solution that was chosen involved complaints offices that were set up during targeting, and monitoring that was carried out every two weeks by the MEAL teams (on the phone). Though the effectiveness of the different offices varied from village to village, a large number of complaints were soon made, and in the majority of cases these confirmed the intuitions of the team.

**A hotline helps to sound the alarm about targeting**

In Yemen, Solidarités International established a hotline before the selection of beneficiaries for a multi-use cash transfer programme. During the process, members of the population sounded the alert via the hotline: during the needs assessment, SI had not taken into account people who regularly move between the targeted villages and a small town nearby. Thanks to the hotline, the team was able to analyse the request and adjust the selection process that was underway. In order to avoid this kind of situation and improve the response, the country office coordinator suggested that socio-anthropological studies should be carried out during the analysis of the context.

**A feedback and complaints mechanism that helps with relations between the team and the beneficiaries**

In Greece, Terre des Hommes is involved in protecting the rights of asylum seekers in urban areas. Families and individuals are housed in flats and are assigned a social worker. In 2018, the monitoring and evaluation team aimed to improve the way feedback from asylum seekers was taken into account in the programme. Having consulted the members of the team and the beneficiaries, and due to the limited resources of the project, the decision was made to reinforce and systematise existing practices, without adding new procedures that would increase the field officers’ workload. People were invited to submit their requests face-to-face during the visits by officers, or to go directly to the office. After several months, the mechanism functions more like a tool to facilitate relations between the team and the beneficiaries than a simple channel for passing on information. When any dissatisfaction is expressed, each person is invited to formally give their feedback. This is used as an opportunity to discuss requests in more detail and the situation can sometimes be resolved by the field officer, thus increasing trust between those involved.
### Participation in decision-making

**Providing programme staff with relevant and timely feedback**

In Syria, Action Against Hunger Spain works via a local partner due to access difficulties. The MEAL department is in charge of measuring social and community impact. Operations are subject to rigid rules and restrictions: the government has restricted the time that can be spent in certain areas, communication channels have been destroyed, people are afraid to express themselves, and written feedback mechanisms and needs assessments are forbidden. Though it is necessary to “go and speak to everyone”, participatory approaches are difficult in practice. Formal feedback and complaints channels that have been put in place are not used by the beneficiaries. The organisation looked for ways to overcome all of these obstacles without putting staff in danger. To this end, the MEAL Coordinator gave priority to coaching her staff, training them in participatory methodologies so that they did not just stay “passive with checklists”, and providing them with mentoring for a year. She said that, “it took time to support them in risk-taking and decision-making”. After a year of awareness-raising and support, the MEAL staff see that the programme teams expect and value their feedback.

**Accountability to local partners**

In Nepal, Handicap International / Humanity & Inclusion has identified implementing partners at different levels (institutions, private organisations and civil society organisations), as requested by the Nepalese authorities. When possible, the partners are chosen before the project proposals are written so that they are able to take part. Needs in terms of skills sharing are identified at the beginning, particularly in relation to writing reports in English and monitoring and evaluation. Every three to six months, a meeting to review the project is organised with the partners. Capacity building sessions are then sometimes organised immediately afterwards to optimise the number of trips. When the partners are unable to travel, a consultation session is organised in advance in the field.

**Participatory presentation of research results with affected people**

In connection with the MAM’Out project, Action contre la Faim carried out a study that aimed to evaluate the effectiveness of cash transfers in preventing acute malnutrition among children under 36 months of age, in the form of a two-arm randomized controlled trial in 32 villages in eastern Burkina Faso. At the end of the study, the results were shared via conferences and articles, and also via regional, national and local workshops. At the local level, an initial presentation was organised for the administrative and health authorities and village leaders (one village leader and another key person from the village). The two village representatives then presented a brochure summarising the results to household leaders, mothers, co-spouses and other village members. An ACF supervisor systematically contributed to the presentation. For the participants, this was the first time that a presentation of this kind had been organised. According to Audrey Papucci, who is an ACF Research Project Manager, this allowed the participants to get involved and achieve a high level of debate about the improvements wanted and uncovered needs, and also helped to promote local customs that have to be taken into account in this kind of programme.

**Making a legal framework for child protection understandable to children through a participatory process, as an example of a rights-based approach**

In Albania, Terre des Hommes is working with the national institutions to develop a national legal framework that includes child rights and protection. So that this can be used by anyone, the organisation carried out a consultation with a group of children to establish what tools are appropriate for different age groups. The youngest children, for example, identified board games like Monopoly as their favoured format, whereas the older ones mentioned social networks and other fashionable media. The participation of the target public allows them to gain access to information about the legal framework and to appropriate it so that they can contribute to transformations in their society.
2.2 Understanding the complexity of barriers

WHAT DOES SUCCESS LOOK LIKE?

The main barrier to putting accountability into practice may be found in its definition. It does not have a specific objective and therefore no precise meaning. Its objective is a grey area that is interpreted differently by each individual and, due to a lack of consensus, the principal way for making progress on accountability is to comply with donor rules or internal procedures. This accountability of compliance, which often ends up being a formal box-ticking exercise, can be seen within many organisations, and is particularly visible among ‘needs-based’ humanitarian NGOs. These give priority to the existence of complaints mechanisms (and sometimes feedback). An official document of one of the participating NGOs states that "gathering comments and feedback is an ideal way to control the quality of the project and to assess the extent to which it is fully meeting identified needs." Given that these organisations are geared towards effectiveness and results-based management, it makes sense to question what added value accountability brings. What is the objective of participation if what we want most of all is to comply with donor rules and to achieve results? The problem is that mechanisms and tools (accountability kits) are being mistaken for a genuinely accountable and participatory approach.

The challenge is different for organisations with a rights-based approach. Participation, and consequently accountability, is close to the organisational culture of empowerment often associated with the notion of rights, and the expected "results" are therefore often the result of a rebalancing of power. There is therefore a more favourable environment for the development of accountability practices, although putting them into practice remains difficult and uneven (according to some interviews, this is particularly strong in countries where participation is integrated into political practices and/or constitutional law). During interviews with staff from this kind of organisation, they mentioned the difficulty of identifying roles and responsibilities in relation to accountability. It is also possible that the fact that accountability is mixed up with the organisation's main area of action makes the term more unclear in terms of responsibility. If successfully achieving accountability means that beneficiaries are able to assert their rights, the goal of accountability and that of the organisation are one and the same.

None of the four participating NGOs have established an institutional system for measuring accountability. During the interviews, individuals were asked to describe their idea of what it is to successfully achieve accountability, and the results were then positioned on a spectrum ranging from an output-orientated vision to change-orientated visions for the sector, affected people and societies. Each individual described between one and three ideas. As can be seen in the figure below, it seems that each of the individuals interviewed has a different - and partial - understanding of success in relation to accountability. Though the indicators for measuring accountability need to be adapted to the context, it nevertheless seems that the road that will lead to success is not defined. Two points stand out:

→ Either individuals feel that accountability is achieved when a mechanism functions properly;
→ Or their view has more to do with a change of approach.
Different ideas about what accountability implies

<table>
<thead>
<tr>
<th>Actions</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Complain and feedback mechanisms are clear and function properly: collection, processing and response.</td>
<td>Priority is given to small-scale local solutions in order to interact directly with civil society and limit intermediate actors.</td>
</tr>
<tr>
<td>Organisations respect the affected people and all other stakeholders.</td>
<td>Everyone works together with shared objectives.</td>
</tr>
<tr>
<td>Indicators are established by affected people to measure accountability.</td>
<td>Individuals' capacities are reinforced, so that they can live autonomously and sustainably.</td>
</tr>
<tr>
<td>The operational structures are flexible in terms of their planning, targeting and operating procedures.</td>
<td>A basic level of active participation is in place.</td>
</tr>
<tr>
<td>The teams use indicators established by affected people to measure accountability.</td>
<td>The affected people trust the aid organisations.</td>
</tr>
<tr>
<td>Local and national partners have a voice in the global humanitarian structure.</td>
<td>The affected people trust the aid organisations.</td>
</tr>
<tr>
<td>The end of the humanitarian industry, development and cooperation as we know them.</td>
<td>The end of the humanitarian industry, development and cooperation as we know them.</td>
</tr>
</tbody>
</table>

Table 1: Ideas about what accountability implies according to the people interviewed
Inspiration: the accountability manifesto in Bangladesh

The manifesto developed by Internews within the CwC working group promotes an idea of accountability that goes beyond the classic definition. It is based on an approach with several objectives:

- Affected people have a clear idea of their rights in terms of humanitarian assistance;
- Affected people have access to feedback and complaints mechanisms;
- Humanitarians coordinate with each other to provide a response to feedback and;
- Trends are analysed and used to improve the humanitarian response.

The manifesto analyses the state of these indicators and gives guidance on communication channels and their use.

A SYSTEMIC APPROACH TO BARRIERS

The barriers to accountability are to be found at different levels of organisation and interaction (individual, team, context, affected people, project, donor, and organisation). Operationalising accountability is a systemic issue that encompasses a variety of different aspects, including cultural aspects. According to an interviewee, “the barriers [to greater accountability] are cultural, related to processes and policies, human resources and the lack of capacity building opportunities for local staff”. The interviewees describe a situation where there are blockages, some of which are rooted in the history and culture of the aid sector, which require a global approach to the subject.

![Figure 2: Barriers to accountability at different levels](image)

Perhaps surprisingly, the barriers mentioned in the interviews are mostly internal. In an accountability and participatory approach, it seems essential to question the influence of external constraints within populations (different points of view, competition for resources, power relations and interconnected needs) which effectively are complex data to take into account. Becoming accountable or participatory means being prepared to open the Pandora’s Box of all the actors involved (organisations, affected people, donors, etc.) and how they function. The
complexity of a context that makes it difficult for affected people (or some of them) to express themselves and participate seems to be a significant barrier and requires detailed analysis of situations.

It is also interesting to note that accountability approaches based on complaints mechanisms are not sufficient to overcome all of these barriers. When they are established in very hierarchical organisations with an economic model that is dependent on institutional donors who use results-based management, their effects are limited. In the same way, even in organisations where the culture is more open to participation and empowerment, the automatic reflexes of the staff remain if the culture is not 'operationalised' via training and support.

FOCUS ON THREE MAJOR BARRIERS

→ The question of attitude and posture

The HAR points out that, ‘Humanitarians (particularly internationals) do not see themselves as community organisers, facilitators, and brokers, but as doers who are there to solve problems deploying solutions that have largely been pre-determined’42. At what level is a change of attitude necessary within teams?

According to a country coordinator from one of the participating NGOs, it is ‘field officers’ who should stop considering themselves to be ‘experts’ because they are the ones who are in contact with the affected people. It is nevertheless interesting to note that certain coordinators and managers interviewed here (both national and international) seem to have integrated what certain interlocutors referred to as a ‘paternalistic’ form of intervention, despite the fact that this does not correspond to their convictions.

The majority are caught up in an ethical dilemma that can be difficult to deal with. On a day-to-day basis, the priority is given to ‘delivering aid’ and ‘implementing activities’, but some think that the priority should be given to communicating with local people and actors. There are two types of reaction: for some, this dilemma leads to frustration and loss of motivation, while others consider that, even if it is not delivered perfectly, aid remains useful, and they accept this compromise.

Another major point is the issue of listening and a people-centred approach - the human dimension of the job. It can be relatively difficult for expatriates, but also for national staff from the middle/upper class to empathise with aid recipients because they do not come from the same socio-economic categories and/or they come from a different geographical area. More in-depth analysis would be necessary to identify those who are the best equipped to understand and interact with people’s needs. One of the people we spoke to about this subject mentioned that the only time that he observed a genuine attitude of accountability on the part of the humanitarian staff was in Rakhine (Myanmar) where they were themselves part of the community.

Even though it is difficult for individuals to adopt a humble posture and to listen, the model is often maintained by the organisations themselves. No training, awareness-raising or briefing session was mentioned during the study on the subject of active listening or inter-cultural communication. The reason given for this by the organisations, and by certain observers, is that this is a question of common sense; working for an aid organisation means that we are naturally capable of showing empathy and of listening. Those who reason in this way criticise the fact that humanitarian and development work has become more ‘technical’ or ‘bureaucratic’, with managers spending most of their time at their computers filling in Excel sheets, including in relation to accountability and participation. This debate does not seem to be very fruitful, and is even sterile, because it polarises two different visions that are based on ideological rather than practical points. Below are two ways that we could shift the debate onto considerations that are more useful to the sector:

42 Ibid.
Accountability – how are we doing?

- Rather than talking of common sense, it might be useful to specify what posture and what values are expected from an organisation's staff: intercultural sensibility, humility, equality, etc. Being accountable means that you consider people (affected people, partners) to be competent to analyse and understand the complexity of their situation. This could be a criterion for recruitment (and could even replace others) or could be included in staff evaluations. Managers and HR staff could also embrace the notion of interpersonal maturity. In recruitments and in overseeing staff, they could promote the capacity to interact with humility, to listen and think critically and to receive feedback. This could help to clarify organisations' charters and ethical codes and ensure that they are signed, understood and respected by all staff.

- The operationalisation of accountability and participation requires specific competencies and methods, as well as participatory and responsible management methods: collective decision-making methods (particularly in inter-cultural groups), active listening and facilitation are all situations that require different decision-making systems. When they need to be used on a large scale (e.g. several thousand beneficiaries), these competencies contribute to genuine participatory 'engineering', similar to the techniques used in participatory democracy.

→ The question of time and the convergence between accountability to donors and to beneficiaries implementing and maintaining participatory decision-making systems, but also building relations of trust with individuals and groups (including local and national partners) requires time. Even optimised, workshops, debates and group and individual interviews are long processes that use up human resources. In the initial stages of a crisis response, this time and these resources may simply not be available. However, the habits from this short period sometimes continue. The time needed to interact properly is not made available by the donors and not budgeted by organisations, nor the time needed to change practices that are rooted in organisations' modus operandi or to change the perspective of populations who are used to receiving humanitarian assistance. In contrast, the formats for submitting projects to donors have become more complicated and difficult to understand for those who are not used to donor compliance, whereas deadlines for submitting them are becoming shorter leaving little (or no) room for participatory methodologies like 'change-oriented approaches'. The projects submitted also tend to be more and more ambitious: unrealistic initial timetables, logical frameworks with dozens of indicators (to which organisations reply by expensive and time-consuming surveys which are often not used to steer the project), the basic constraints of the project are ignored or minimised, etc. Among the competing priorities that field staff face, accountability towards beneficiaries is therefore another box to tick in order to successfully complete each project with the minimum available resources possible. Finally, the current trend among donors to consider measuring aid recipients' satisfaction quantitatively as a proxy for quality and accountability is not an incentive to rethink practices in depth.

→ The use of inappropriate analysis methodologies

Once they agree on their accountability objectives, teams can choose the appropriate methodologies, that is to say, what it is necessary to do to be accountable. At headquarters and in the field, NGOs seem to have integrated how donors understand implementation and monitoring, limiting reflection about methods. As a result, priority is given to quantity rather than quality, the performance of staff (and directors) is evaluated in terms of budget size and the number of contracts, and staff give priority to measuring numerous quantitative process and output indicators, which are increasingly imposed by donors or by the organisations themselves. During the interviews, the lack of qualitative social analysis and socio-anthropological studies was mentioned several times as a major shortcoming. Practitioners should analyse the political, economic, social, and environmental conditions as well as the territorial.
cultural and linguistic dynamics ('analyse' rather than 'assess', which implies that they are already familiar with the problem). Such analysis requires time and resources that are not always made available by funding agencies. Post-distribution surveys and inconsequential discussion groups (which are really information sharing or quantitative data collection exercises in disguise) do not provide this level of understanding. As one of the interviewees put it, "we only scratch the surface". Improving our understanding of "our areas" is a precondition of accountability, but these practices are deeply rooted in field staff habits. As stated in one of the self-assessments that was consulted in connection with this study, the appropriate systems have yet to be created, and they require specific skills, as well as time and resources.
3. OBSERVATIONS AND RECOMMENDATIONS

OBSERVATIONS AND RECOMMENDATIONS

• A term that lacks clarity: the need for increased appropriation by organisations
  Despite the existence of standard frameworks, there is a tendency within the sector, including among the participating NGOs, to promote unclear terms without providing a definition or an operational vision. Given the imbalance between donors and affected people in terms of influence and power, using such a broad term runs the risk that it will be interpreted to the advantage of donors alone. Without increased appropriation by organisations, accountability is limited to a meaningless exercise in compliance, or the use of tools to comply with donor demand and show ‘an impact’, or performance.
  → It would be useful for each NGO, and particularly for staff at headquarters, to question their definition of accountability. If the CHS’s definition is used, it should be complemented with elements that are specific to the organisation.

• Commitment by management: greater effort needed to marry accountability to affected people and organisations’ management models
  Commitment from management is often given as a precondition of operationalising accountability, but what is understood by ‘commitment’? In organisations that have grown and developed a lot in recent decades, it is not easy to reconcile a results-based management model and accountability to affected people. Without any specific changes, the main way that progress is made in terms of accountability is to comply with donor rules or with internal procedures.
  → The different internal actors do not have the same motivations, and awareness-raising efforts, which have often been directed at MEAL/Quality focal points, should be directed more towards decision-makers (heads of operations, audit/risk managers, general directors) in order to establish where there is room for change and propose realistic alternatives to the results-based and performance-based management model.

• Accountability frameworks within institutions and in the field: good practices exist, but the appropriate systems have yet to be created
  The sector has enough standards and norms but NGOs find it difficult to define an accountability framework and the form that this should take. What is more, when a framework exists, it is not easy to evaluate its relevance and its application.
  Accountability as part of a MEAL approach brings several challenges:
  ○ It obscures three central themes of aid (safeguarding, participation and empowerment) which require different skills and deserve clear strategies.
  ○ The relationship between the ‘A’ and the other three letters in MEAL is not clear and this can lead to accountability being disconnected from its meaning.
  → Deconstructing accountability into several competencies / positions might be a solution. Certain NGOs from the sector have already separated accountability from
Accountability – how are we doing?

monitoring, evaluation and learning (MEL vs. MEAL). This is an interesting approach because it could help to reinforce the cross-cutting nature of accountability.

- **Common sense vs. technical approach: move on from the debate and propose realistic alternatives, particularly in relation to interpersonal maturity.**
  
  As stated above, the debate about common sense does not seem to have led to sufficiently credible operational methods given current operational environments. Clarifying what is expected of humanitarian staff (inter-cultural skills, humility and a commitment to equality), for example through role-playing, establishing ways to support them in terms of ‘relational maturity’, and using collective decision-making methods based on active listening might be areas for improvement. The frequent criticism of the aid sector’s overly technocratic/bureaucratic nature would also benefit from being reformulated in order to be more precise: what is the place of professionalism? What is in danger of being lost in making the sector more bureaucratic?

  ➔ Staff are more concerned about the excessive demands of financial and administrative reporting, and measuring outputs and outcomes, than about new ways of interacting with affected people. The latter should be further explored and tested, either internally, or with the help of specialised organisations. Techniques from participatory management and participatory democracy should also be explored.

- **What is needed to improve accountability to affected people?**

  It is important to recognise the current efforts to devise systems that are capable of maintaining open dialogue with communities. However, these require a lot of resources (both human and other resources) to implement institutional policies but also to create appropriate systems and remain humble, even when there are competing priorities between accountability to the donors and accountability to beneficiaries. There are many barriers and overcoming these will require significant commitment at every level of the aid sector. Are the procedures and levels of control that exist still relevant given the way aid organisations have become increasingly structured and bureaucratic?

  ➔ More bold initiatives from donors would be desirable to remove a certain number of systemic barriers: greater budgetary flexibility, simplified logical frameworks (adaptable results and activities, no more than five contractual quantitative indicators, change-orientated approach required and qualitative methods encouraged) and regular interaction with the project team to understand the constraints involved and the progress being made. All this would have the objective of allowing staff to spend more quality time in the field.

  ➔ Improving understanding to improve involvement: the reasons behind the slow progress of the ‘participation revolution’ are not only to be found within aid organisations. Contexts are complex and require detailed analysis of power issues. Organisations would benefit from focusing more on understanding cultures and contexts, particularly through socio-anthropological analysis, and less on using one-stop solutions.

**FURTHER EXPLORATION OF THE ISSUE OF ACCOUNTABILITY**

- **Studying the relationship between internal management methods and accountability (mirror effect):** Some

  Translators without Borders supports organisations in terms of communication and translation.
of the data from this study suggests that a pyramid-based and weakly participatory management model, as exists in certain organisations, country offices and teams, could be a barrier to the operationalisation of accountability. Are the mirror effect and exemplarity necessary ingredients? Is it possible to be participatory externally without being participatory internally? It would be interesting to look in greater detail at how the use, or non-use, of participatory organisational and managerial practices affects the interaction between teams, national and local actors and affected people.

- **Identifying and analysing examples of good practice** (case studies): what are the ingredients of success? What does an accountability approach change? Identifying good practices in the field was not easy during this study. Nevertheless, examples do exist and would benefit from being studied in depth to act as credible sources of inspiration.

- **Defining relevant indicators to steer projects**: the majority of organisations are unsure about what indicators to choose to measure the engagement of affected people and national and local actors. Compiling and analysing the relevance of indicators, based, for example, on CHS indicators, could help to establish indicators that are useful for project implementation, and not only dedicated to accountability to management and donors.

- **Exploring the relationship between inclusion and accountability**: more inclusive human resource policies, particularly in terms of gender and diversity, but also recruitment and support to national staff, could be an additional way to improve the balance of power between NGOs and affected people. Studying the effects of these policies would provide useful insight into the subject of accountability.

- **More participatory research**: the current study is not based on an analysis of what people directly concerned by aid operations want. Participatory studies (with affected people and NGO staff) would appear to be the next step so that the operationalisation of accountability can go beyond compliance and superficial corrections.
ANNEXE 1

Organisation A

Quelques spécificités de la stratégie redévelopabilité actuelle

Création de l’unité MEAL siège (5-6 personnes);
Renforcement des postes MEAL sur le terrain;
Réflexion sur des études socio-anthropologiques concernant la redévelopabilité et la participation;
Déploiement des politiques de sauvegarde.

Organisation B

Quelques spécificités de la stratégie redévelopabilité actuelle

Cadres et standards « métier » sur la protection de l’enfant;
Déploiement de la politique institutionnelle genre et diversité;
Déploiement du Code de Conduite, établissement d’un réseau de points focaux « sauvegarde » (y compris PEAS);
Amélioration de la mesure des effets;
Adaptation des cadres et standards sur la gestion du cycle de projet en lien avec la norme humanitaire fondamentale (CHS);
Structuration de départements Q&A & M&E dans les délégations : formation, accompagnement;
Renforcement des compétences et apprentissage sur des méthodologies éthiques, participatives, non biaisées.

Organisation C

Quelques spécificités de la stratégie redévelopabilité actuelle

Création de postes chargés de redévelopabilité bailler au siège et sur le terrain pour dégager du temps sur la qualité des programmes;
Rédaction d’une note de cadrage interne sur la redévelopabilité bénéficiaire;
Réflexion sur des études socio-anthropologiques concernant la redévelopabilité et la participation.

Organisation D

Quelques spécificités de la stratégie redévelopabilité actuelle

Mise en place d’un mécanisme de plainte et feedback par mission;
Accent mis sur l’amélioration de la participation des populations en 2019;
Amélioration de la protection des données personnelles;
Auto-evaluation CHS en cours.

Les services du siège en charge de la redévelopabilité

Direction Innovation, Impact et Information
Travaille en particulier sur les méthodologies de suivi et évaluation, mécanismes de plaintes et feedback, approche participative, partenariat et apprentissage continu.

Direction des opérations (Chargé de projet politiques de protection)
Travaille sur le déploiement des politiques de sauvegarde.

Les services du siège en charge de la redévelopabilité

Secteur Protection transversale
Travaille sur les approches d’intervention (Participation et empowerment de l’enfant)

Unité Qualité et Redévelopabilité
Travaille sur les méthodes de cycle de projet et de suivi-évaluation, ainsi que les sujets transverses (genre, inclusion, participation...)

Les services du siège en charge de la redévelopabilité

Direction Opérationnelle Adjoints au Programme
Travaille sur la qualité et redévelopabilité bailler des programmes via les méthodologies de SIE (MEAL & TECH); Travaille sur la redévelopabilité bénéficiaire via des mécanismes de plaintes et feedback (MEAL)

Direction Transparence et Développement Institutionnel
Travaille sur la sauvegarde Travaille sur la redévelopabilité bailler via audit et compliance

Les services du siège en charge de la redévelopabilité

Service Santé et Pratiques de soin
Travaille sur le genre et la protection

Service Recherche, Plaidoyer et Expertise
Travaille sur les méthodes de suivi et évaluation, mécanismes de plaintes et feedback (MEAL) et de participation

Service Audit, Risques et Conformité
Travaille sur la sauvegarde
BIBLIOGRAPHY

Publications


Online materials

http://groundtruthsolutions.org/our-work/developing-a-framework-for-accountability-in-south-sudan/
http://groundtruthsolutions.org/our-work/tracking-the-grand-bargain-from-a-field-perspective/
http://groundtruthsolutions.org/our-work/tracking-the-grand-bargain-from-a-field-perspective/
Accountability – how are we doing?

https://interagencystandingcommittee.org/accountability-affected-populations-including-protection-sexual-exploitation-and-abuse/content-1
https://interagencystandingcommittee.org/accountability-affected-populations-including-protection-sexual-exploitation-and-abuse/content-4
https://www.bond.org.uk/groups/feedback-and-accountability
https://www.bond.org.uk/resources/eight-principles-for-building-trust-through-feedback
https://www.internews.org/updates/increased-communication-still-critical-rohingya-refugees
https://www.internews.org/updates/increased-communication-still-critical-rohingya-refugees
https://www.urd.org/fr/publications/Livres/article/le-manuel-de-la-participation
IASC AAP Commitments:
Launch of the ICRC and Harvard Humanitarian Initiative discussion paper: Engaging with people affected by armed conflicts and other situations of violence. 28 March 2018, Geneva

**Internal documents**

Accountability – how are we doing?