

# HPG Briefing

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HUMANITARIAN POLICY GROUP

**Margie Buchanan-Smith**  
Independent consultant  
**Sarah Collinson**  
HPG Research Associate

## About HPG

The Humanitarian Policy Group at the Overseas Development Institute is Europe's leading team of independent policy researchers dedicated to improving humanitarian policy and practice in response to conflict, instability and disasters.

## In brief

- This HPG Briefing Paper looks at donor accountability in international humanitarian action.
- It identifies significant weaknesses in all areas of official donors' accountability for humanitarian policies and action.
- Important changes in funding and coordination arrangements may enhance accountability, but are not translating into an equitable distribution of humanitarian aid resources. Gains in performance are difficult to measure and prove.
- National and international mechanisms for the public scrutiny of donors' humanitarian programmes should be strengthened. This in turn will require that donors clarify the strategic objectives of their emergency aid.



Overseas Development Institute

111 Westminster Bridge Road  
London SE1 7JD

Tel: +44 (0) 20 7922 0300

Fax: +44 (0) 20 7922 0399

ODI email: [odi@odi.org.uk](mailto:odi@odi.org.uk)

HPG email: [hpgadmin@odi.org.uk](mailto:hpgadmin@odi.org.uk)

Website: [www.odi.org.uk](http://www.odi.org.uk)

## International humanitarian action and the accountability of official donors

### Introduction

Over the past decade, there have been significant changes in the way official donors finance and organise their response to humanitarian crises. These changes have been dubbed the 'bilateralisation' of humanitarian response – a catchy, but often misleading, label. This Briefing Paper reports on one aspect of a larger study of these trends: how donors themselves are held accountable for their performance as humanitarian actors.

Donor agencies have become increasingly concerned to strengthen the accountability of the operational humanitarian agencies that they fund. This concern has not been matched by a similar level of attention to how effectively donors are held to account for their policies and for the impact of their aid.

### Key obstacles to donor accountability

Democratically-elected governments and their departments are arguably the most accountable of bodies, yet donor accountability in the humanitarian sphere is in fact highly problematic. Particular obstacles include:

- *The range of political and policy environments that aid departments operate in, and the wide variety of actors with an interest in their policies and activities.* Different parts of government and different humanitarian actors view donors' responsibilities and their effectiveness in very different ways.
- *The changing objectives of official humanitarian assistance.* Relief is now expected to include protection, and to contribute to development and/or

conflict reduction. This increased complexity has led to disagreement among donors and other humanitarian actors as to what humanitarian aid is for, and how performance can be measured.

- *The nature of the stakeholders and the location of relief activities.* Beneficiaries are not part of a donor government's electorate, and are usually in a singularly weak position as stakeholders. Links between donors and beneficiaries are at best tenuous and indirect, while aid tends to be delivered in places that are largely inaccessible to the bodies that scrutinise a donor's aid programme.
- *The lack of clearly-defined responsibilities among humanitarian organisations and problems of attribution.* It is difficult to pinpoint donors' responsibilities and to hold donors accountable. If responsibilities have not been clearly defined, it is easy for one actor to blame another for failure.

### Levels of accountability

**Strategic and legal accountability**  
Arguably, donors' principal commitments and responsibilities are limited to disbursing aid and facilitating the delivery of assistance. Deciding where and how to provide humanitarian assistance is, however, a highly political, and controversial, process. Many donors have tried to make their aid responses consistent with their foreign and defence policies in conflict-induced crises. However, humanitarian policies cannot be assessed against the same criteria; a government could succeed in its stated aim of securing peace, for instance, but this does not say anything directly about its humanitarian policies and their impact, or about the government's adherence to

**Box 1: What is accountability?**

For donors, accountability can have four main components:

- agreement of clear roles and responsibilities;
- taking action for which the donor is responsible;
- reporting on and accounting for those actions; and
- complying with agreed standards of performance and responding to the needs and views of stakeholders.

Donor agencies and their ministers and civil servants are accountable for different things at different levels:\*

1. *Political/strategic accountability*: mainly to members of the executive responsible for defining overall policy objectives and allocating resources.
2. *Legal accountability*: to national courts of law, and to any relevant supranational court.
3. *Managerial accountability*: for achieving delegated targets and objectives for the use of resources, including negotiating and managing contracts with service providers.
4. *Financial accountability*: for the regularity, effectiveness and efficiency with which public resources are managed.
5. *Contractual accountability*: to agencies and/or independent organisations, including NGOs. These agencies are accountable for providing services to clients in accordance with contractual terms agreed with the department concerned.

\*Adapted from John Glynn and Michael Murphy, 'Public Management: Failing Accountabilities and Failing Performance Review', in *International Journal of Public Sector Management*, vol. 9, nos 5–6, 1996.

humanitarian principles. Consequently, donors' accountability at the strategic level is uncertain.

Humanitarian assistance is rarely an explicit part of national legislation, and so donors' legal accountability is also weak. Switzerland is one of the few donor countries to have established a statutory basis for its humanitarian assistance. The strategic or political accountability of ministers and their civil servants can only be buttressed by legal accountability if their policies and actions are circumscribed by relevant and sufficiently clear legislation. A statutory definition of humanitarian assistance at national level would strengthen donors' accountability, and help to protect humanitarian aid from undue political influence.

Donor agencies have developed more explicit strategies for their humanitarian programmes. These usually refer to international humanitarian law and to fundamental principles of humanitarian action. However, these statements are typically at a general level. For strategic objectives and legal obligations to translate into effective and measurable policy achievements, it is important that they are linked explicitly to policy and programming systems and formal monitoring and accounting structures within the donor organisation.

**Managerial accountability**

Traditionally, the monitoring of aid programming has focused on inputs and assistance activities. In recent years, however, many donors and operational agencies have adopted results-based management to monitor and measure how a department or project is performing. In theory, this should shift attention onto outputs, outcomes and impacts.

Results-based management calls for clear objectives, indicators and targets. However, there is no accepted measure of humanitarian performance, nor is it easy to identify where fault lies when failures occur. Agencies should establish performance indicators reflecting their objectives, and ensure that there is mutual understanding between donors and partners regarding how and whether such data feed into assessments of performance.

At project level, many donors use log frames in the design, planning, implementation and monitoring of projects. These require the specification of outputs, purposes and goals, as well as inputs and activities. Log frames cannot, however, incorporate strategic and longer-term objectives and impacts. Assessing results or impacts above project level is problematic because of the difficulty of scaling up from project-level data to higher-level indicators, and because of the problem of establishing who is responsible or accountable for particular outcomes.

There is also a tension between monitoring and evaluation to support learning and management, and monitoring and evaluation to strengthen accountability. In emergency relief, aid tends to be provided in complex and fast-changing environments, and the performance data available is of poor quality. Moreover, some standard mechanisms of performance management are not applicable to much relief programming because projects fall below the relevant funding threshold for triggering a detailed review, or because the time-scale of projects is too short.

Performance reporting within donor organisations usually centres on the annual resource allocation round. This raises a further question about the reliability of self-assessment, since the links between assessment and resource allocation inevitably encourage departments to report their performance in a positive light. It is therefore important that monitoring based on self-assessment is balanced by independent external evaluations at all levels.

While evaluations of emergency programmes have become increasingly popular since the mid-1980s, few have explicitly focused on donors' humanitarian aid programmes. In 1999, Danida commissioned a major evaluation of its humanitarian assistance, but this seems to be an exception. The Canadian International Development Agency (CIDA)'s Performance and Evaluation Branch, for instance, has not evaluated any aspect of Canada's humanitarian assistance programme, and DFID's evaluations department has led only one evaluation of humanitarian aid – the British government's response to the Montserrat volcanic eruption – since 1997.<sup>1</sup> External evaluations commissioned by the Conflict and Humanitarian Affairs Department (CHAD) within DFID have been mainly concerned with assessing the performance of partner organisations.

**Financial accountability**

Donors' financial accountability is weak, since it is extremely difficult to track flows in official humanitarian aid funding across the aid system. The variety of channels available means that it is often difficult to build up a clear picture of any one donor's overall humanitarian aid spending, or the balance of spending across different emergencies and different forms of assistance. The figures often do not reflect a consistent definition of what counts as humanitarian assistance, and they usually do not fully reflect the contributions made by non-aid actors, such as the military.

Persistent problems with financial reporting impede efforts to reconcile resource flows with humanitarian need. This is where there is perhaps the greatest mistrust between operational humanitarian agencies and donors. Operational agencies have been slow to provide robust and objective assessments of need; despite improvements in needs assessment and resource mobilisation, donors' decisions about the allocation of resources are seen as driven by factors other than need. The Consolidated Appeals Process (CAP) provides at least a proxy means of examining the allocation of resources between different countries. Analysis of these figures shows that donors' resources are concentrated on a very small number of emergencies in countries of political importance in the Balkans and the Middle East.

## Lines of accountability

### 'Horizontal' and 'downward' accountability

There are no established international structures or mechanisms to regularly scrutinise the performance of the humanitarian system as a whole. The 1996 evaluation in Rwanda remains the only system-wide attempt to scrutinise the entire international response to an emergency, including the role of donors.<sup>2</sup>

The Development Assistance Committee (DAC) of the OECD is important in setting standards and monitoring, particularly through periodic peer reviews and, indirectly, through its Working Party on Aid Evaluation.<sup>3</sup> However, it has no working group on humanitarian assistance, and there are no accepted standards of donorship in the humanitarian sector.

New 'framework agreements' between donors and multilateral agencies set out how the donor aims to work with the partner agency, including funding commitments. In theory, these agreements provide a basis for stronger mutual accountability. However, most are one-sided, relating almost exclusively to the partner organisation. What accountability they impose on the donor tends to focus on its managerial responsibilities as an enabling and funding institution.

'Downward' accountability to the beneficiaries of humanitarian aid is also weak. Recipients are not able to hold donors and other actors to account for results. The accountability cycle is dominated by 'supply side' actors, including NGOs. However, NGOs do not necessarily provide a reliable conduit for communicating the interests and concerns of beneficiaries.

There is a need for all actors concerned with improving performance or scrutinising humanitarian assistance – including evaluation departments and consultants, parliaments, audit offices, NGOs, academics and the media – to strengthen their efforts and invest resources in ensuring that the beneficiaries (and potential beneficiaries) of relief play a more direct role in holding humanitarian agencies to account. Efforts should focus on enhancing the input of beneficiaries into needs assessments, evaluations, audits and parliamentary inquiries.

### 'Upwards' accountability in the donor country

Overall, donors' formal 'upward' accountability to domestic political institutions and stakeholders is considerably stronger than their 'horizontal' and 'downward' accountability. Upward accountability depends on a clear definition of strategic policy objectives. The UK government, for instance, has set out a

relatively detailed set of strategic objectives for its international development programme; two White Papers outline policy and objectives, and a Public Service Agreement (PSA) and supporting 'Service Delivery Agreement' between DFID and the Treasury state the department's priority objectives, with associated performance measures and targets. So far, DFID's formal corporate-level commitments in respect of humanitarian assistance remain focused on process targets and objectives, more than results. Hence, there is currently no PSA target for humanitarian assistance, although an SDA target specifies that DFID will seek to reduce the impact of violent conflicts and man-made and natural disasters 'by the provision of timely, effective [and] coordinated emergency assistance in response to crisis situations'.<sup>4</sup>

Parliamentary oversight is the ultimate mechanism of formal democratic accountability. Among the various available avenues – including parliamentary questions and debates – parliamentary committees offer the greatest potential for detailed, specialised and sustained scrutiny of policy. The potential power of these committees resides in their ability to launch inquiries of their own choosing, to call witnesses (whether ministers, civil servants, independent experts or other stakeholders) to give written or oral evidence, and to make recommendations to the department concerned. This potential is, however, rarely fully realised. In Denmark and Canada, for instance, the committees responsible for examining overseas aid have shown relatively little interest in humanitarian assistance (a small part of the total aid programme). Although the UK's International Development Committee (IDC) conducts relatively frequent and detailed inquiries, the government is not obliged to accept its recommendations.

In the majority of donor countries, the national audit office carries out a detailed examination of a department's financial and managerial performance. These investigations provide independent external scrutiny and review of the detail of policy implementation. However, these audits are primarily concerned with value for money and the ways that policies and programmes are implemented, and often concentrate on issues of financial probity; they do not focus on the policies themselves.

Informally, the media, NGOs and academics can play a significant role in holding the government to account for its humanitarian policies. Ministers are often particularly sensitive to media pressure, and the media can be a particularly powerful driver of government accountability at the political/strategic level. But the media is also unreliable; the UK's IDC, for instance, regarded the British media's response to the humanitarian emergency in Afghanistan as 'disappointing', and suggested that 'much more could be done to show the world the true nature of the crisis'.<sup>5</sup> Moreover, both parliament and the media rely heavily on NGOs and other operational agencies for supporting evidence and information. While they have the potential to provide more reliable scrutiny than the media, operational agencies are also actors in the humanitarian system, and so are not neutral observers. NGOs also have no formal responsibility to scrutinise donors' policies and performance, and they may not invest significant resources in doing this.

NGOs and other humanitarian agencies should recognise the important and influential role that they play in donors' upward accountability, and recognise the responsibilities that this implies.

In particular, they should ensure that the evidence and information they provide to parliaments and the media represent as directly and accurately as possible the needs and concerns of the beneficiaries and potential beneficiaries of humanitarian aid.

## Conclusions

Donor governments have supported many of the initiatives associated with the ‘accountability revolution’ within the humanitarian system. Yet there has been surprisingly little reflection on the implications of these initiatives for donors themselves. Measuring the effectiveness of any policy requires a clear statement of what it is trying to achieve. This in turn demands a clear definition of strategic roles and responsibilities, and a clear understanding of the purpose of humanitarian aid.

Strengthening the accountability of donors can best be achieved by focusing on improved strategic and political accountability, against clearly defined strategic objectives and definitions of humanitarian assistance, which are followed through clearly at the managerial and contractual levels. This suggests that:

- *there is a need for debate between donors, supported by the DAC, to establish clearer norms for donor behaviour; to enhance the quality of financial reporting and to enable more accurate analysis of the relationship of emergency aid to humanitarian need;*
- *donors should ensure that their overarching objectives for humanitarian assistance are formally and explicitly linked to internal systems of managerial accountability and results-based management, and systems of external reporting;*
- *efforts to improve performance monitoring and lesson learning should be supported by periodic independent evaluations by donors of their emergency assistance programmes; and*
- *wider efforts to strengthen accountability across the humanitarian system should include more regular system-wide evaluations.*

Internationally, there is little to hold donors to account for their obligations under international humanitarian law, which in any case is more relevant to political and military action than to humanitarian assistance. This makes it all the more important that:

- *there is a sound legal basis for humanitarian assistance at national level. Overall financial accountability also remains weak; relief funds are very difficult to track, and the relationship between donors’ funding decisions and humanitarian need is almost impossible to assess;*
- *operational agencies should try to establish independent and critical analysis of humanitarian need, and to review how effective donors and others are in meeting this need; and*
- *they should also seek to ensure that the victims of humanitarian disaster play a more direct role in holding donors and other humanitarian actors to account.*

Managerial accountability tends to be where most attention and effort have focused. But the impact of results-based programming has been relatively uneven because the absence of clearly-defined goals and agreed indicators of success makes it difficult to establish appropriate measures of performance. Public scrutiny of donors’

humanitarian aid is also weak, and needs to be strengthened. Apart from short bursts of interest during high-profile emergencies, parliaments generally show relatively little concern for humanitarian assistance. While national parliaments represent the primary mechanism for holding donor governments to account, they are heavily dependent on evidence and analysis provided by other actors, mainly the media, NGOs and academia. These sources are often partial and unreliable; links to the ‘real’ stakeholders – the victims of conflict and disaster – remain relatively tenuous. In this context:

- *parliamentary committees should press for clear government objectives and targets for humanitarian assistance, and these should be supported by guiding legislation;*
- *committees should also ensure a more systematic and independent approach to their scrutiny of humanitarian assistance.*

Finding ways of strengthening accountability should not mean more bureaucracy and red tape, nor should it encourage more risk-averse behaviour by donors. Indeed, more monitoring, evaluating and reporting does not necessarily lead to greater accountability, since everything depends on what is monitored, evaluated and reported, how, by whom, and for what purpose. But without more effective systems for holding donors to account, it is difficult to identify areas where their performance might be improved or their responsibilities strengthened in the interests of victims of humanitarian disaster.

## Related resources

- Joanna Macrae, *The Changing Role of Official Donors in Humanitarian Action: A Review of Trends and Issues*, HPG Briefing Paper 5, December 2002
- Margaret Buchanan-Smith and Natalie Folster, *Canada’s International Humanitarian Assistance Programme: Policy Oversight Mechanisms*, HPG Background Paper, December 2002
- Margaret Buchanan-Smith and Ulrik Sørensen Rohde, *Danida’s International Humanitarian Assistance Programme: A Case Study of Accountability Mechanisms*, HPG Background Paper, December 2002
- Sarah Collinson, *Donor Accountability in the UK*, HPG Background Paper, December 2002

## Endnotes

- 1 The evaluation is Ed Clay et al., *An Evaluation of HMG’s Response to the Montserrat Volcanic Emergency* (London: DFID, 1999).
- 2 *The International Response to Conflict and Genocide: Lessons from the Rwanda Experience, Vols 1–4* (Copenhagen: Steering Committee of the Joint Evaluation of Emergency Assistance to Rwanda, 1996).
- 3 See *Guidance for Evaluating Humanitarian Assistance in Complex Emergencies* (Paris: Development Assistance Committee, 1999).
- 4 See the *Public Service Agreement 2001–04* and *Service Delivery Agreement 2001–04* (London: DFID, 2001).
- 5 *First Report. The Humanitarian Crisis in Afghanistan and the Surrounding Region* (London: The Stationery Office, 2001), paragraph 83.

This Briefing Paper is drawn from Joanna Macrae et al., *Uncertain Power: The Changing Role of Official Donors in Humanitarian Action*, HPG Report 12 (London: Overseas Development Institute, 2002). The report is available from [www.odi.org.uk/hpg/publications.html](http://www.odi.org.uk/hpg/publications.html). Printed copies are available on request from ODI.