

Report on an evaluation of the
Humanitarian Accountability Partnership - International

Geoffrey Salkeld
September 2009

Note to HAP-evaluation from the Board

In April 2009, following an open recruitment process, the Chair of the HAP Board commissioned an external and independent evaluation to:

- document HAP’s progress against HAP International’s mission and vision, its key policies (New Emergencies Policy, Accreditation and Funding), and the strategic targets set out in the 2007- 2009 strategic plan;
- review and assess the relevance and appropriateness of the 2007- 2009 strategic plan to HAP’s mission, and the specific objectives of the BSO project;
- recommend changes of strategy and emphasis that should be incorporated into the HAP 2010-2012 strategic plan.

While the Board does not necessarily agree fully with the contents of the evaluation it has agreed to make public the report, stressing its independence and highlighting its findings regarding the impressive progress made by HAP in promoting the accountability agenda over recent years.

The Board notes that the evaluation captures the situation as observed by the consultant at a given point in time. Even as the evaluation proceeded, some of the factors discussed changed and, to some degree, these changes are not captured in the final version of the evaluation. The Board would also note some misunderstandings and/or misrepresentations in the report. Nonetheless, we accept the Report as written and note that the executive summary raises particularly important issues that should be addressed promptly. In particular, the Board accepts the finding that we have been insufficiently engaged in fulfilling our governance role and we will indeed be more rigorous in this regard henceforth.

The Board

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List of abbreviations (in order of appearance)

HAP-I	Humanitarian Accountability Partnership-International
MTSP	Medium Term Strategic Plan
NEP	New Emergencies Protocol
BSO	Building Safer Organizations
NGO	Non-Governmental Organization
CARE	Cooperative for Assistance and Relief Everywhere (no longer in use)
ECB	Emergency Capacity Building
Q & A I	Quality and Accountability Initiatives
GA	General Assembly (HAP)
OFADDEC	Office Africain pour le Développement et la Coopération
CAFOD	Catholic Agency for Overseas Development (UK)
DCA	Danish Church Aid
SIDA	Swedish International Development Agency
ACFID	Australian Council for International Development
ED	Executive Director (HAP)
WCRWC	Women's Commission on Refugee Women and Children
USAID	United States Agency for International Development
CWS PA	Church World Service Pakistan/Afghanistan
CA	Christian Aid (UK)
UNIFEM	United Nations Development Fund for Women
DFID	Department for International Development (UK)
IAWG	Inter-Agency Working Group on Emergency Preparedness
Groupe URD	Groupe Urgence, Rehabilitation, Développement
SCF	Save the Children Fund (UK)
ICVA	International Council of Voluntary Agencies
CHF	Swiss Francs
PSG	Peer Support Group (HAP)
AWP	Accountability Work Plan
HAF	Humanitarian Accountability Framework
CFSI	Community and Family Services International
CODEC	Community Development Centre (Bangladesh)
SSEWA	Society for Safe Environment & Welfare of Agrarians in Pakistan
WVI	World Vision International
ISO	International Standards Organization
SCHR	Steering Committee for Humanitarian Response
SGS	Société Générale de Surveillance
CERF	Central Emergency Response Fund (UN)
UNHCR	United Nations High Commissioner for Refugees
UNRWA	UN Relief and Works Agency (for Palestine Refugees)
UNICEF	UN Children's Fund
WFP	World Food Programme
WHO	World Health Organization
ICCO	Interchurch Organization for Development Cooperation (Netherlands)
ALNAP	Active Learning Network for Accountability and Performance
INTOSAI	International Organization of Supreme Auditing Institutions
DAC	Development Assistance Committee (OECD)
DEC	Disasters Emergency Committee
CARB	Certification and Accreditation Review Board (HAP)
ACT International	Action by Churches Together International
ADRRN	Asian Disaster Reduction and Response Network

Foreword

This is the second and final version of the evaluation report. This version has taken account of the feedback comments forwarded by the Chair on 4th September 2009. There was a very wide divergence of views between the comments. The evaluator had requested a consolidated, single feedback from HAP but this was not possible.

This final report corrects errors of fact and interpretation contained in the draft report; clarifies and expands on points that were unclear and makes the minor improvements suggested by the Chair of HAP with which the evaluator agrees.

It would not be in HAP's interests to try to gloss over the fact that responses to the evaluation raised important issues on which there are serious disagreements between and among Member agencies, Board members, Secretariat staff and external stakeholders. The issue is therefore not whether or not the critical responses are correct or whether HAP Members, Board or Secretariat agree with them: the point is that the views have been expressed by one or more of HAP's internal or external stakeholders and as such they are all legitimate and deserve attention.

There are two methodological limitations to the evaluation. The first is that it is almost entirely qualitative. Apart from the factual information contained in HAP's annual reports and other documents, the evaluation is based largely on responses to open questions which therefore primarily reflect respondents' opinions, derived from their experience and or knowledge of HAP either as Members, Board members, Secretariat staff members or external stakeholders. Some opinions are backed up with concrete examples but many are not.

Second, the response rate was unsatisfactory. Therefore statistical analysis of the responses would have created a falsely "scientific" impression and would have been largely meaningless. Responses are therefore quoted (or paraphrased) in order to illustrate the consensus or range of viewpoints on the issues.

Respondents are identified where permission has not been refused in the responses to the completed questionnaires or telephone interviews

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September 2009

Executive summary

1. The evaluation was commissioned by the Chair of HAP in April 2009 and was conducted during May and June of the same year. This evaluation report is based on 78 written or oral responses to 158 written questionnaires which were sent to HAP Member agencies, current and former HAP Board members, HAP Secretariat staff, humanitarian agencies which are not members of HAP, quality and accountability agencies, a small number of front line staff, donors and external experts. The methodology also included telephone interviews, meetings with HAP Secretariat staff, participation in the HAP General Assembly and Board meetings of May 2009, and an extensive document review. The evaluation is almost entirely qualitative, based on open questions inviting opinions supported where possible by factual evidence or examples.
2. The evaluator regrets that it was not possible to obtain direct evidence from disaster survivors or beneficiaries of humanitarian assistance. The evaluation cannot, therefore, present any findings or conclusions as to the impact of the humanitarian accountability policies and practices promoted by HAP on the welfare, attitudes or rights of survivors and beneficiaries other than what is available in secondary sources.
3. This report is of course concerned with the “*what*” of HAP – the achievement of the substantive goals and objectives that lie at the heart of the organization’s vision and mission. But it is also an analysis of the “*how*” of HAP: the strategies, approaches, structures and resources that HAP employs to pursue its objectives.
4. HAP was formally established in December 2003 and has therefore had an effective working life of five and a half years. For the first three years it operated on the basis of short-term rolling work plans supplemented by “strategic policy papers”. In 2006 HAP developed its first “Medium-term Strategic Plan” (hereafter MSTP) for the three-period 2007 -2009. This evaluation was conducted in May – June 2009: half a year before the end of the MSTP period. Funding and staffing constraints have caused delays and scaling back of plans and budgets. HAP has not yet been able to “fire on all cylinders” to the extent envisaged when the MTSP was written in 2006. In the Secretariat’s view a key factor was the under-estimate of the time and effort required for agencies to achieve certification.
5. Nevertheless, a high level of ambition and “fast-track evolution” have characterized HAP’s short life. These have enabled HAP to achieve significant successes with limited resources and in a short time. HAP punches well above its weight in terms of human and financial resources.
6. Respondents recognise that HAP has played a significant part in promoting the cause of humanitarian accountability – especially accountability to beneficiaries – throughout the humanitarian community. The message is now impacting not only on the NGO community but also within UN and donor circles.
7. Specifically, HAP developed and rolled out the widely-acclaimed and widely-used HAP Standard for Humanitarian Accountability and Quality Management in 2007, published the comprehensive Guide to the HAP Standard in 2008 and is currently revising the Standard on the basis of feedback from the first generation of users, which includes concerns about terminology and complexity.
8. The ideal of compliance verification has been given concrete form in the HAP Certification process. Five members have completed the process and were certified in 2007 and 2008, and a further 15 are enrolled for Baseline Analyses with a view to completing the Certification process in 2010. Although this is well below the strategic plan target, nevertheless it is a significant achievement.
9. HA’s membership has increased from the original six to 38 by mid-2009 and membership growth is accelerating.
10. The value of HAP’s complaints handling capacity-building and other services has achieved concrete recognition in the willingness of Members to contribute towards cost recovery to the extent

that self-generated revenue will account for 20% of total expenditure in 2009 and is projected to rise to 30% in 2010.

11. The New Emergencies Policy and the field-level deployments associated with it have won widespread appreciation and clearly had an impact at agency level. HAP has contributed significantly to strengthening the accountability practices of Members and their partners in Pakistan, Bangladesh and Myanmar during some of the most serious natural disasters of recent years.
12. The merger of the Building Safer Organisations project, originally hosted by ICVA has placed the specific issue of protection from sexual exploitation and abuse by aid workers within the framework of agency-wide policies and structures to empower beneficiaries to complain and seek redress about all kinds of abuse, corruption or bad practice. HAP's Complaints handling and capacity-building work – including the work initiated by the BSO – has achieved significant results and outcomes in during a short period of implementation with a small dedicated staff. Agencies' demand for these services exceed HAP's current capacity even though HAP recovers some of their cost by charging fees.
13. In the humanitarian accountability "marketplace", HAP has not effectively engaged in crucial policy debates such as UN humanitarian reform or the Good Humanitarian Donorship process. HAP's single-minded emphasis on its version of compliance verification is considered (by some) to have blinded HAP to the complex realities confronting some of the world's leading non-governmental humanitarian and development agencies.
14. Whatever the rights or wrongs of the substantive issue about the added value and applicability of the HAP Certification scheme, HAP has become perceived by some respondents as impatient with and intolerant of those who question HAP's view of compliance verification. The tone of HAP Secretariat's response to a recent initiative by two HAP Board members to move the debate forward constructively exemplified this.
15. In terms of governance, HAP is a member-ship based organization but has become increasingly Secretariat-driven. The original expectation that the Membership would engage in raising funds for HAP and in advocacy has not been realised to any meaningful extent. The Board has not filled this vacuum by providing coherent and consistent strategic direction and leadership. As a result the highly energetic, committed (and highly overstretched) Secretariat staff play a leading role both in setting and in driving forward HAP's agenda. While this has enabled HAP to score significant successes, it raises questions about governance and organizational stability and sustainability which will need to be addressed in the context of the next strategic plan.
16. The "what" of HAP is enshrined in its objectives, as set out in the Statute (Article 5) which are:
 - 1) To develop and maintain principles of accountability to beneficiaries through research, consultation and collaboration
 - 2) To support members and potential members...in adhering to the principles of accountability to beneficiaries by providing training and advice
 - 3) To communicate, advocate, promote and report on principles of accountability
 - 4) To monitor and report on implementation of HAP's principles of accountability to beneficiaries and to accredit its members accordingly
 - 5) To assist members in finding solutions where concerns or complaints are raised about them.
17. If these five objectives were originally regarded as having equal weight – all contributing equally towards the "promotion of the highest principles of accountability through self-regulation" (and this appears to have been the understanding of some of the original Members), then the MTSP and developments since its adoption represent a degree of evolution. The phrase "and to accredit its members accordingly" in objective (4) has emerged as a leading edge objective, morphing into "compliance verification through the HAP Certification process". This has been done quite openly and transparently: the intention is made clear in the first pages of the MTSP and in Secretariat work plans and in the web site version of HAP's mission statement. But it has been done without the whole-hearted support and engagement of some Member agencies and Board members. This has resulted in continuing tensions.

18. Five Members have been certified so far (the first in 2007), fewer than was envisaged in the MTSP. The first two Certificates will not be reviewed for renewal until April 2010 and the next three in November 2010. The first Certified Members (and those who are enrolled in the Certification process) provide impressive testimony as to the benefits of the process at agency level (impact on policies, practices, staff attitudes, deployment of new systems and procedures). But there has been little field-level evaluation or assessment of the impact of the HAP certification on the quality of life, autonomy or dignity of beneficiaries, as was confirmed by John Borton in the 2008 Humanitarian Accountability Report. The evidential platform for advocating the efficacy and widespread appropriateness of the HAP Certification scheme is not strong. This research gap is significant but HAP is not addressing it with the urgency it deserves.
19. Reviewing the controversy surrounding the HAP Certification scheme, the question arises: is the HAP Secretariat moving too far from and too fast ahead of the membership and the wider humanitarian sector? If the Board and General Assembly were to decide to make compliance verification through Certification against the HAP Standard a condition of full membership, they would also need to take into account the significant “*how*” implications that would arise in such areas as:
- The need to revise the statement of HAP’s fundamental objectives in the Statute;
 - Changing the membership criteria and obligations
 - Managing relations with Members (and other humanitarian agencies) which have not yet accepted this strategic direction and which may not do so in the future;
 - The need to reconfigure major areas of work, such as research, field work, advocacy and communication, to play a primarily supportive role to compliance verification via Certification.
20. Whatever strategic choices the Board makes when it reviews the new draft strategic plan, HAP will need to improve significantly its ability to communicate positively, avoid defensiveness and sell its challenging and demanding proposition in a way which inspires and invites engagement and support from a significant number and wide range of stakeholders and audiences within the humanitarian NGO sector, UN agencies, donors, the academic community, the media and key external audiences such as national and local legislators, consumer groups and civil society. Crucially, HAP will also need to reach out to the francophone regions, Latin America and other key Asian countries and the Arabic-speaking world if it is to maintain and build on the impetus and successes it has achieved during its first half-decade of existence.
21. The evaluator recognizes the limitations of the material on which the report is based: - the low rate of response from some respondent categories, the absence of primary data and the predominance of qualitative rather than quantitative information. These limitations mean that the report’s findings and conclusions should be seen as illustrative and indicative rather than definitive. They are intended to present the Board and Secretariat with an as balanced as possible reflection of the views (often contradictory) of a wide range of stakeholders; views which, the evaluator believes, HAP should take account of in developing its next strategic plan.

1. Introduction

1.1 Terms of reference

The ToR are summarised at Annex A. Briefly, they called for an evaluation of HAP's achievements, particularly during the period of the current Strategic Plan (2007 – 2009) and the of relevance and appropriateness of the Plan and of HAP's approaches and work. The scope of the evaluation was to cover programme, governance, management and finance issues through the lenses of "relevance, achievements and appropriateness" and make recommendations. A wide range of internal and external stakeholders was to be consulted through written questionnaires and interviews and the findings triangulated, as far as possible with documentary evidence.

The evaluation timetable overlapped with the preparation of HAP's next strategic plan (2010 – 2012) and the initial, provisional and incomplete findings of the evaluation were made available to the strategic planning consultant and Secretariat, with the permission of the Chair of the Board of HAP.

1.2 Methodology

The evaluation was based on questionnaires sent by e-mail to respondents suggested by the Secretariat as well as some contacted independently by the evaluator (see Annex B). Telephone interviews were held with a number of respondents. Relevant documents supplied by HAP and some respondents were studied and a number of web sites of members and other agencies were visited (see Annex C).

Ten different questionnaires were sent to the following categories of informants:

Informant category	Questionnaires sent (number)	Responses received (no.)*	Percentage response
1. Full members	31	17**	55
• <i>Certified</i>	5	4	80
• <i>Enrolled for certification process</i>	15	6	36
• <i>Not certified or enrolled</i>	11	6	46
2. Associate members	7	0	0
3. Board members	22	12	54
• <i>Current</i>	12	8	67
• <i>Former</i>	10	5	50
4. Secretariat staff***	18	15	83
5. Humanitarian agencies (non- members)	18	10	55
6. Quality & Accountability Initiatives	7	3	43
7. Other relevant agencies	9	4	44
8. Field-level managers and staff****	21	10	48
9. Donors	15	4	27
10. External experts	10	5	50
Totals	158	80	51

* including some telephone interviews in place of questionnaires.

** includes one Full, Certified Member whose response arrived too late for inclusion in the report.

***including one former staff member

****nominated by Board members

Reminders were sent to non-respondents after the first deadline.

The ToR indicated that "visits to member and non-member agencies at two different locations are budgeted for this work", and the Evaluator was willing to undertake such visits, however site visits either to Member HQs or to field offices did not take place..

The overall response rate is satisfactory but responses from for HAP Members, Donors and Quality & Accountability Initiative members are below expectations. This should be borne in mind when assessing the significance of the responses quoted in the various sections of the report.

1.3 Report overview

Following this Introduction, the report is organized in six sections. After Section 2, “Strategic overview”, the subsequent sections correspond to the latest organizational structure of the HAP Secretariat: Policy Services, Development Services, Regulatory Services, and Governance & Management. The sub-sections of each chapter are related as far as possible to the original fifteen “components of the approach” or “objectives” in HAP’s 2007 – 2009 Medium Term Strategic Plan. Section 7 briefly reviews progress against HAP’s “aspirations” as set out in the MTSP.

Each major section starts with an introductory background which summarizes what was intended in the MTSP and reviews the progress and setbacks as recounted in the annual Secretariat reports for 2007 and 2008. Responses to the evaluation questionnaires are grouped by respondent category. As far as possible direct quotations have been used and these are attributed to the respondents where permission to do so has been given. Each questionnaire explicitly gave the respondent the option of remaining anonymous. Where respondents have requested this option, the quotations are identified by respondent category (e.g. “Member”, “Secretariat staffer” or “current Board member”). Where a number of responses are identical or very similar, these have been paraphrased into a single generic response. Where controversial issues have arisen, an additional effort has been made through follow-up e-mails and telephone interviews to enable the various proponents to explain and justify their viewpoints.

Each section ends with “conclusions and issues of concern” which provides a summary of the achievements and issues that deserve attention.

The evaluator recognizes that the limitations of the material - low rate of response from some respondent categories, lack of primary data and the predominance of qualitative rather than quantitative information – mean that the report’s findings and conclusions need to be seen as illustrative and indicative rather than definitive. They are intended to present the Board and Secretariat with as balanced as possible reflection of the views of a wide range of stakeholders; view which the Evaluator believes HAP should take account of in developing its next strategic plan.

2. Strategic overview

2.1 The changing environment for humanitarian accountability

The reviews that form the opening chapters of the HAP Accountability Reports for 2005, 2006, 2007 and – especially – 2008 comprehensively describe the impact of external and internal factors on the development of the humanitarian sector in general and on humanitarian accountability in particular. They document and analyse changes in policies, practices and perceptions in far greater detail than would be possible or appropriate for this evaluation report. This short section is therefore based on Members’ responses to questions about the external challenges and opportunities “likely to affect the cause of humanitarian accountability during the coming years”.

Many respondents point to the impact of changes in the political, economic and security environment since the end of the Cold War and the emergence of the (so-called) war on terror. Public awareness of human suffering and human rights violations has “put the humanitarian sector front and centre in the political debate” and this has “raised the bar for humanitarian agencies to increase accountability to donors, beneficiaries, international organizations, civil society and foreign governments.”

A detailed – and frank – response from Muslim Aid UK highlighted three main points:

- Recent and current humanitarian crises have “strong, violent and political dimensions” as evident in Darfur, Gaza, Pakistan and Iraq. Agencies’ space was restricted in these and other crises such as Cyclone Nargis in Myanmar. Consequently agencies frequently “had to work in such a way that compromised our intention of involving beneficiaries...”
- The current financial crisis combined with the focus of large donors on the UN has slowed down the abilities of humanitarian organizations to respond quickly and efficiently. “Responding...through the cluster approach is good for analysis and sector-specific coordination...however interconnectedness and coordination becomes time-consuming.”
- Resources and training materials on accountability are available and there is evidence of growing inclusion of accountability with agencies’ policies and practices. The main internal

challenges are to educate and train all levels of staff and to ensure that humanitarian accountability is clearly understood by state actors “within the various traditional and local cultural contexts of communities affected by disaster”.

Another Member cites the (perhaps extreme) example of the DPRK as a context in which communication with beneficiaries and their participation in aid programming demands being especially “cautious” and “keeping a low profile”. CARE International also points to the complexity of “achieving genuine downward accountability in conflict situations where humanitarian space and protection issues have significant implications for risk when establishing accountability systems which are transparent and have ‘non-threatening’ complaints/feedback mechanisms”.

A Member in South Asia points to the trend towards political decentralization and the growing responsibility of local elected bodies for the welfare of local citizens. This trend has not necessarily been matched by increasing understanding of and respect for human rights. This poses an additional challenge to agencies seeing to bring humanitarian accountability down to the grass roots level. Other Members point out that donors do not demand the same standards of accountability from governments as they do from their NGO partners or from the UN. Accountability for NGOs is therefore in danger of being seen as donor-driven: an equitable relationship needs to be established.

Other points highlighted by Members were:

- The introduction of armed forces and private companies into the humanitarian sector (both in the relief and reconstruction phases) and, more generally, the diminishing space for disinterested, non-state humanitarian actors¹;
- Donor pressure to “incorporate political and humanitarian action into a single approach” is a key challenge.
- The increasing frequency of climate change related disasters and the resulting short time available for learning and applying lessons;
- The decline in (official) funding opportunities for northern NGO donors and increasing demands to demonstrate value for money;
- Linked to this, the “increasing leverage of southern NGOs and their involvement in the accountability process” is seen as an opportunity, provided the resulting increase in knowledge strengthens accountability and the plethora of standards and guidelines can be grouped “into a more structured and audited standard”;
- The emergence of non-food aid options for food security including local/regional purchase and market-based interventions (all of which bring new accountability challenges);
- The challenge of being able to demonstrate and measure impact effectively and in ways that are consistent across all actors in the sector;
- The globalisation of communication and rapid developments in communication technology has wide and diverse implications for the sector. Humanitarian agencies are more subject to media scrutiny while the same developments have enormous potential for increasing the effectiveness and reach of capacity-building and training efforts at very local levels;
- Informal methods of electronic communication, especially popular among the young and activist groups present increased opportunities to hold humanitarian agencies to account;
- Increased awareness of gender-related issues, especially reproductive health and gender-based violence has widened the scope of accountability monitoring.

2.2 Realizing the vision and mission: HAP’s strategic achievements and setbacks

2.2.1 Background

HAP International’s vision and mission are set out in Articles 3 and 4 of the organization’s founding Statute, as follows:

- “Article 3: The vision of HAP International is a humanitarian sector with a trusted and widely accepted accountability framework, which is transparent and accessible to all relevant parties.
- Article 4: The purpose of HAP International is to achieve and promote the highest principles of accountability through self-regulation by members linked by common respect for the rights and dignity of beneficiaries.”

¹ For example a current British Army recruitment advertisement shows soldiers distributing food aid from the back of a truck.

The 2007 – 2009 Strategic Plan states that “It is against this...vision and mission any activity undertaken by HAP should be evaluated.”² The Plan sets out a large number of aspirations, goals, objectives, measures of success etc. However, the kernel is expressed in the section titled “Our 3-year aspiration” which calls for (in summary):

- Significant changes of attitude and practice of accountability towards beneficiaries within the NGO sector;
- The wider humanitarian community (UN, donors) recognise the necessity of accountability;
- HAP certification is a valid means of evidencing an NGO’s ability to implement accepted standards and a general acknowledgement of the value of certification;
- HAP is firmly established as an organization by the end of 2009 and is recognised as “the hub for accountability best practice and advocacy”;
- Measurable improvement in the provision of humanitarian aid by HAP certified agencies, recorded by beneficiaries and external evaluators;
- Institutional donors recognize the value of HAP certification and this is reflected in their relationships with HAP certified agencies.
- The added value of HAP services that build agencies’ accountability capacities is recognised.

The extent to which these aspirations have been achieved is briefly reviewed in Section 7 at the end of the report.

2.2.2 Members’ responses³

Strategic achievements

There is general agreement that HAP has contributed to defining and promoting humanitarian accountability – particularly accountability to beneficiaries – to a much higher position on the sector’s agenda than it was at the beginning of the decade. HAP has become “the loudest champion of beneficiary voices”. More than one Member nuances this by pointing out that most progress has been achieved in the English-speaking world.

The most frequently-mentioned significant success is the development and rolling out of the 2007 HAP Standard. HAP has made accountability issues “more understandable” and offered practical guidelines and tools. There is a “significant improvement in information and communication in relation to [HAP] services; accountability lessons from members.”

Initiating compliance verification through the development of the Certification process is also recognised by many Members as a significant achievement – although one Member believes that Certification has been over-emphasized at the expense of HAP’s capacity-building and professional support services. On the other hand, a Member points out that – so far – agencies have opted for Certification without pressure from donors, indicating “a genuine commitment to becoming more accountable to beneficiaries”.

Other Members also highlight the establishment of Complaint Handling Mechanisms within agencies; the merger with the BSO Project and the deployment of the Roving Teams as significant achievements. Many Members praise the NEP deployments that have helped put the Principles into practice (e.g. in Bangladesh, Myanmar and Pakistan)

Setback and lessons

The main setbacks and lessons that Members refer to concern:

- Although the HAP Standard is an acknowledged achievement, “the usability of the Standard and language is exclusive”;
- The small number of Certified agencies (five as of mid-2009); especially that some of the bigger Members have not signed up for Certification; some Members are not “championing” HAP;

² The Strategic Plan rephrases the Statute version of the vision and mission. The wording of the vision and mission on the HAP web site also differs in wording from the Statute version.

³ Based on questionnaire responses and group discussions at the HAP General Assembly, May 2009

- The experience and lessons of the Certified Members should be analysed and communicated more effectively;
- The need to set clearer timetables for Certification take-up and setting “expiry deadlines” on Baseline Analyses;
- The need to address the particular needs of multi-mandate NGOs in the Standard and reflect on the future of HAP in relation to the development as well as the humanitarian sphere;
- The funding challenge: a sustainable funding base has not yet been achieved; the next strategic plan should be “less ambitious”;
- Continuing inadequate coordination among Quality and Accountability Initiatives and the “proliferation of accountability organizations”. (This is not unanimous: one Member cites “improved collaboration...including the accountability component of the ECB Project...which resulted in excellent collaboration around the development of the Good Enough Guide, which HAP incorporated into its Handbook”. However, the same Member also underlines that there is still room for improvement in collaboration among the Q&A Initiatives.
- Research, learning and communication have under-achieved. The lack of an integrated communications strategy is combined with the lack of a “business case” for accountability, which would strengthen arguments to donors to provide resources for accountability and capacity-building
- “Putting certification at the top of HAP’s advocacy agenda without the general agreement of the membership has undermined efforts to promote HAP’s vision and mission”;
- Slow progress on linkages with donors; HAP absence from the UN humanitarian reform process;
- One GA group reported back that Members should be better enabled to set HAP’s agenda; another group called for “messages from HAP” to come from the experience of Members and not from the Secretariat.

Commenting on the GA group discussions about the evaluation, the session Chair (HAP Vice-Chair Antonio Donnini) highlighted five points:

- There is progress – in Q & A collaboration, in the UN and donor communities, in HAP growth, Certification and brand;
- There is virtually no engagement of French or Latin American humanitarian actors;
- There is a sense that HAP has over-complicated the language of the Standard and the need to strike a balance between advocacy and membership services;
- The debate over “HAP or AP” (i.e. whether HAP’s mandate should be expanded to cover development cooperation as well humanitarian response) could open up too widely and should perhaps be postponed;
- The need to achieve greater participation of disaster survivors in HAP’s work.

2.2.3 Conclusions and issues of concern

- HAP has contributed to defining and promoting humanitarian accountability – particularly accountability to beneficiaries – to a much higher position on the sector’s agenda than it was at the beginning of the decade.
- Through the HAP Standard. HAP has made accountability issues “more understandable” and offered practical guidelines and tools. There is a “significant improvement in information and communication in relation to [HAP] services; accountability lessons from members.”
- Initiating compliance verification through the development of the Certification process is also recognised by many Members as a significant achievement.
- The establishment of Complaint Handling Mechanisms within agencies; the merger with the BSO Project and the deployment of the Roving Teams are seen as significant achievements. Many Members praise the NEP deployments that have helped put the Principles into practice (e.g. in Bangladesh, Myanmar and Pakistan);

A major challenge at the strategic level is to expand HAP’s footprint – and therefore the footprint of humanitarian accountability – to a wider range of important regions, countries and institutions.

Issues of concern regarding the HAP Standard, Certification and HAP’s development services are addressed in later sections of the report.

3. Policy Services

3.1 The HAP Standard (MTSP objective 10.1)

3.1.1 Background

The majority of respondents praise HAP's Humanitarian Accountability and Quality Management Standard almost unreservedly. The Standard consists of three elements:

- The HAP Principles of Accountability (7)
- The Humanitarian Accountability Covenant (9 primary, secondary and tertiary principles)
- Benchmarks for the HAP Standard (6)

The target:

The MTSP assumed that "accountability standards will have been developed tested and published by the end of 2006". Periodic revision would lead to a new Standard which would be at "a higher level and more demanding on the agencies to deliver higher degrees of accountability to their beneficiaries." The first revision would lead to the HAP 2009 Standard, to be produced in 2008 and endorsed by the HAP General Assembly in 2009.

Following publication, there would be a post-publication "assessment of the standards in practice...to evaluate the use of the standards in the field". This was to be an independent assessment.

Progress:

The Standard was developed on the basis of consultations with a reference group comprising 96 aid agencies, 216 specialists, 76 individual beneficiaries and beneficiary focus groups, aid practitioners and members of the Quality and Accountability Initiatives group. HAP's view is that the resulting Standard "is the most appropriate and transformational way to handling the accountability deficit".

The Standard Development Manager was appointed in mid-2005 but there were several, steep "learning curves":

- Members were committed to the process but had limited time in which to engage with it;
- HAP – rather than members – had to take action to ensure beneficiary participation;
- The purpose of the first planning meeting had to be changed. There was disagreement between Secretariat staff as to the purpose of the meeting and the decision to invite beneficiaries was not communicated until a week before the planned date;
- There was no draft document ready for the first Editorial Steering Committee meeting in November 2005.
- Enormous progress was achieved in 2006: three workshops, three auditing trials and the consultation process (see above).
- Sign off by the Board took more than two months and it was evident that some members of the Board had not been sufficiently engaged in the process. There was disagreement about the relationship between the "Covenant" component of the Standard and the Red Cross Code of Conduct.

The Standard was adopted in January 2007 by the full Board at a specially convened meeting and the Guide to the Standard was published in 2008. The main reasons for delay were a) staff recruitment problems; b) the difficulties HAP encountered in identifying disaster survivors to join the HAP Standard Reference Group in 2005, and c) the "unanticipated complexity of the development, testing and adoption processes experienced in 2006" (HAP Secretariat annual report for 2007).

The HAP Standard was formally launched in April 2007 and the first two HAP Certificates were awarded to OFADEC and the Danish Refugee Council in the same month (having completed their compliance audits in March and April).

The Standard review process was initiated in 2008 with a consultation with the Board and Member agencies. Consultations were also held with The Sphere Project and People in Aid and HAP committed itself to moving towards inter-operability between the Sphere Common Standards, the People in

Aid Code and the HAP Standard. The planned Standard review workshop was delayed until 2009 owing to the absence of the Policy Services Coordinator.

The planned independent “post-publication assessment of the standards in practice” has not been implemented.

3.1.2 HAP Members’ responses

Six of the 13 Members who responded to the Questionnaire mentioned the HAP 2007 Standard as a “strategic success” (unprompted).

A Certified Member spelled out the value of the Standard (and the process of seeking Certification under the Standard) as follows:

- It has set a target for the agency
- It has provided tools to “rationalize our work with quality improvement”
- It has had a disciplining effect
- It has earned the agency additional respect with government donors

Concern’s response typified many: “Through workshops on the HAP Standard and carrying out HQ and field Baseline Analysis, there is an increased awareness and understanding of what being accountable to the targeted communities...means in practice...” “The integration of the HAP Standard into [the agency’s] management systems...will assist in improving the quality of programmes and accountability...”

The same Member also stresses the need “to maintain the Standard’s integrity”, though against what is not made clear. However this Member also suggests “developing a two-stage Standards where the first level is less demanding”.

Several respondents believe that HAP Member agencies should be more active in promoting the Standard. One Member’s approach to “promoting the HAP Standard has not been as a stand-alone tool, but rather as a key reference for [the agency’s] Humanitarian Accountability Framework...it is the HAF that introduces staff to the HAP Standard. In other words, the emphasis should be on making “humanitarian action accountable to its intended beneficiaries” (as in the HAP mission statement) rather than promoting the Standard by itself “since this tends to provoke *‘not another initiative’* types of reactions from field staff and their managers at HQ.”

Several raised concerns about the terminology and what they regard as needless complexity of the HAP Standard.

3.1.3 Board members’ responses

The Board discussed the first draft of the HAP Standard at their meeting in November 2006 and approved by the Board in a teleconference in January 2007, with the proviso that it should be reviewed after two years. This review is now in progress.

Three of the 11 current and former Board members who responded to the questionnaire mentioned the HAP Standard (unprompted) as a strategic achievement. Many made positive indirect references to the rolling out of the Standard. HAP “has shown that it is possible to actually measure the performance and quality of an organization and use the Standard as a yardstick to ensure that a quality management system prevails...and that a mechanism for beneficiary accountability is possible and sustainable.”

A former Board member refers to the Standard as “an obvious *sine qua non*” and says “the Standard gets deeper and broader as Member organizations move along the scale of Accountability. Efforts should always be made to incorporate as much as we can the standards of other Q&A initiatives.”

The Chair of HAP expresses a concern that “HAP is stepping up and speeding up the demand with regard to member compliance to still more sophisticated standards, so that it will be difficult to ‘deliver’. With many members that are not certified, we should consolidate our position and strive for

more certified members – not accelerate with the result that renewal of existing certifications is difficult and that new certifications are hard to obtain.”

CAFOD’s HAP Board member finds that “The language of the HAP Standard and Guide can be complex and confusing. This has made communicating HAP and gaining a wide understanding of the main principles difficult. This has also taken away from the desire to make the Standard and the Principles accessible to all and user-friendly. There is a disconnect between what HAP is actually trying to promote and those who it is actually supposed to benefit.”

One significant critical issue relating to the HAP Standard concerns the relationship between parts of the Standard and the Red Cross Code of Conduct. The issue was raised in January 2007 by Oxfam GB in a note to the Board. The note points out that the HAP Standard includes some new principles (such as witness and complementarity) which are not in the Code, while excluding others that are (such as a commitment to reduce future vulnerabilities and respect for culture and custom). The HAP Standard also sets a hierarchy in terms of primary, secondary and tertiary principles, while the Code does not. The note proposed some changes to the Standard which were not, however, accepted by the majority, thus precipitating Oxfam GB’s resignation from the Board. The Secretariat prepared notes addressing these issues which were approved by the Board.

3.1.4 Other responses

The Dutch agency ICCO and Churches in Action has been briefed on the HAP Standard and Certification scheme and plans to “promote HAP principles and standards among its operational but fully autonomous partners”.

The Humanitarian Consortium of Oxfam International (OI) is “committed to promoting [HAP principles and standards] as a key tool to enhance accountability to beneficiaries...These principles are a key reference for OI humanitarian work, and therefore they have been incorporated into the OI Humanitarian Dossier.”

The Philippine Council for NGO Certification regards the HAP Standard and Certification scheme as “a comprehensive and reliable instrument to evaluate and certify humanitarian organizations”.

Several of the “frontline” respondents referred in positive terms (and unprompted) to the HAP Standard. An OFADEC field programme manager said that “The HAP Standard increases the credibility of all member organizations”. However, several pointed out that using the Standard demands a pragmatic approach. A field programme manager of Mercy Malaysia said “the guidelines and handbook must be more user-friendly. A colleague from the same agency thinks “the HAP Standard is not effective enough as humanitarian staff in the field need more guidelines and practical guidance; at the moment everything is in theory”. Another in Sudan finds the Standard “very helpful to guide us in delivering good quality and accountable services...however not all the benchmarks set by the HAP Standard are suitable to all situations; to be pragmatic certain standards are rather impossible in this part of the world – e.g. complaints handling”.

A World Vision International manager who has cooperated with HAP in Myanmar and Sri Lanka explains her agency’s approach to the HAP Standard as follows: “I utilize the definition of accountability from the HAP Standard, outline standards like the Red Cross Code of Conduct and Sphere...The HAP Standard provides an overview of the principles and expectations about implementing accountability. But we have developed internally the tools that we use to ensure that they are as practical and ‘do-able’ as possible for field staff...the HAP Standard does a good job of outlining the key elements...but the requirements of Benchmark 4 around staff competencies and Benchmark 1 around a quality management system are very difficult for a large agency with a federated structure...”

A field programme manager of the Danish Council of Churches believes that it is “too early to speak of effectiveness of the Standard here within the [field] office. However, the HQ use of the standards, which in most cases overlap with core DCA values...serves as a reminder to uphold the highest possible standards.”.

As noted under Certification, SIDA regards the HAP Standard and Certification scheme as having “high value, high relevance” but only “medium to high appropriateness” because of the lack of effec-

tive collaboration among Quality and Accountability Initiatives. The Oak Foundation praises the Standard but notes that “impact is still to be demonstrated”.

An expert working in one of the Quality and Accountability Initiatives believes that the Standard (and certification scheme) “gives us a concrete basis on which to measure accountability. The problem remains how actually to do this in practice. It’s a huge challenge to make it real – as opposed to a meaningless paper exercise, which is the risk it becomes”. However, the same respondent finds the Standard “long, complicated, hard to use by many at field level.”

Another Quality and Accountability Initiatives respondent (identity withheld) expressed concern that HAP might be overlapping with other agencies’ areas of competence, for example in regard to Benchmark 4 and wondered if this was a symptom of “mission creep” on HAP’s part.

3.1.5 Conclusions and issues of concern

- The development of the HAP Standard (together with HAP’s work in field situations) is regarded by most respondents as a significant achievement. Even agencies which have reservations about some aspects – such as the “Covenant” – have included the Principles and some or all of the Benchmarks in their policies and training manuals.
- Some of the factors that caused the delay in developing and publishing the Standard were within the Secretariat’s control – such as the management of preparations for the first planning meeting; others were not – particularly the lack of engagement by members and the Board.
- Secretariat staff respondents are aware of concerns about terminology and complexity and the need to make the Standard available in more languages (even more than the seven already achieved or planned) and confirm that the current Standard Review process is addressing these issues.

3.2 **Research** (MTSP objective 10.4)

3.2.1 Targets and progress

The MTSP foresaw HAP pursuing two approaches – conducting its own research and evaluation activities, and encouraging and “engaging academic institutions” to undertake relevant research. The substantive focus would be on evaluating the Standard in practice; researching the financial and quantitative arguments for accountability and (in 2009) publishing evaluations of the HAP Standard and Certification scheme.

Despite staffing problems in 2006 -2007, HAP has commissioned a series of studies on developments and trends in humanitarian accountability, published in the Humanitarian Accountability Reports for 2006, 2007 and 2008. These, combined with the annual “accountability perceptions” studies provide a growing body of information and analysis and form HAP’s most consistent achievement in the research area. The year 2007 saw an important piece of commissioned research on “how humanitarian aid programme participants perceive the impact of activities by humanitarian NGOs to prevent and respond to sexual exploitation and abuse”. Sixty-five consultations were held in Kenya, Namibia and Thailand, involving 295 beneficiaries.⁴

The 2008 Humanitarian Accountability Report recognises that HAP’s operational role (in standard-setting and certification) creates a vested interest in “showing a positive ‘business case’”. HAP has made contact with a number of institutions including the Harvard Humanitarian Initiative and Law & Policy Forum, Virginia Tech., the Oxford Refugees Studies Centre, the London School of Economics and other northern hemisphere universities and academic centres. However, continuing staffing problems delayed the establishment of “strategic research partnerships” and the planned conference on “Accountability to beneficiaries”. Nevertheless, HAP was represented at a number of important research gatherings during 2008 and an annotated bibliography on relevant subjects was published on the HAP web site. The publication of HAP’s research agenda was postponed to 2009.

⁴ “To complain or not to complain: still the question”, published March 2008

3.2.2 Responses

One Member respondent finds HAP's "action research" well behind schedule and blames "the emphasis by HAP leadership on the development of the Standard and Certification along with frequent staff turnover/absences". He claims that Members' offers of data and research capacity have not been taken up.

Secretariat responses to the questionnaire reveal a range of views. There is a general acknowledgement that this is an important area where HAP has seriously under-achieved but no consensus on the reasons.

One staff member believes that the emphasis on equating "the best" with big northern research institutions has held the research promotion agenda back: it would be more productive to "find research partners with a keen interest in our issues and our mission; sometimes these are the smaller universities and the southern ones. The commissioned reports have been hampered by the shortage of funds and internal 'gatekeepers'". In other words, the slow progress is mainly due to factors within HAP's control. "At the moment we do not have enough cases (agencies) in a position to provide enough of a sample to 'prove' anything and, as a result... the HAP research agenda is getting ahead of itself."

The link between research and advocacy means that "objectivity ranks lower than it ought to". A recent example that "there is little in the way of research development for the purpose of providing objective evidence" is a decision to include "a particular agency in a commissioned report AFTER [emphasis not added] it was 'proven' that they would illustrate the benefits of HA certification..."

The 2008 Accountability Report is a "huge success" which makes it clear that HAP fills one gap. "But there is also a gap in the moral argument which can be supported with facts; what is the moral imperative for being accountable to those suffering and how can we show that the sector fails to meet that imperative?"

The ED blames the lack of progress in the research area on two factors:

- A series of unsuccessful staff appointments that have affected HAP's own work;
- The "research gap" being due to "a set of individual agency decisions [i.e. humanitarian agencies] that for fairly obvious organizational reasons are more interested in finding out how to raise money than how to spend the existing money to better effect".

Another colleague takes a robust attitude towards the need to commission outsiders: there is "too much fuss" about this. "I would suggest we should do our own and this will provide the basis for third party [validation]. We need too much evidence now...We have a researcher who is only being used as an administrator – we are wasting his skills and should use them." This view is endorsed by another staffer who points to the need for HAP's Researcher to work with members who have excellent raw data which needs professional analysis and presentation. A third observes "We tend to get caught up in doing unsound research and waste the talents of a qualified and experienced researcher..."

One staff member's suggestion for *future* strategy is that "HAP should phase out its research function in the next three to five years." However, "For now it is critical that the evidence HAP has access to is being adequately analysed and shared in the public domain".

Despite the concerns expressed by some respondents, HAP has been able to generate a considerable body of factual and analytical information in the annual report series and the 2007 perceptions study. The key issue for the future is to define the purpose and priority of research in HAP's range of strategic approaches and then to allocate appropriate resources and manage the activity supportively and consistently.

3.2.3 Conclusions and issues of concern

- HAP has commissioned a series of studies on developments and trends in humanitarian accountability, published in the Humanitarian Accountability Reports for 2006, 2007 and 2008. These, combined with the annual "accountability perceptions" studies provide a growing body

of information and analysis and form HAP's most consistent achievement in the research area.

- The year 2007 saw an important piece of commissioned research on "how humanitarian aid programme participants perceive the impact of activities by humanitarian NGOs to prevent and respond to sexual exploitation and abuse".
- The 2008 Humanitarian Accountability Report recognises that HAP's operational role (in standard-setting and certification) creates a vested interest in "showing a positive 'business case'".
- Continuing staffing problems delayed the establishment of "strategic research partnerships" and the planned conference on "Accountability to beneficiaries". Nevertheless, HAP was represented at a number of important research gatherings during 2008 and an annotated bibliography on relevant subjects was published on the HAP web site. The publication of HAP's research agenda was postponed to 2009.
- The key issue for the future is to define the purpose and priority of research in HAP's range of strategic approaches and then to allocate appropriate resources and manage the activity supportively and consistently.

3.3 Advocacy , communication, marketing and the HAP web site (MTSP objectives 10.8, 10.9 and 1010.)

3.3.1 Targets and progress

The "key components" of HAP's advocacy strategy, as set out in the MTSP, were to be:

- A programme of planned regular events
- Campaigns "leveraged" through members (e.g. beneficiary accountability campaigns)
- Annual awards ceremony
- The HAP annual report as a vehicle for advocacy

The 2007 and 2008 HAP Secretariat Reports provide evidence of considerable activity and public awareness results in the form of participation in a number of international and national fora, recognition by DFID and DEC; organizing the first Humanitarian Accountability and Quality Management Award (in April 2007); widespread coverage of the publication of the Guide to the HAP Standard; the publication of "To complain or not to complain: still the question"; the (second) re-launch of the HAP newsletter (incorporating the BSO Investigator" and the launch of the new HAP web site (all in 2008).

A start has been made on translating basic materials into languages other than English: in 2008 the HAP Standard was published in Urdu and French and the Benchmarks were published on the HAP web site in Arabic and Bengali. The Principles of Accountability were also published on the web site in Bengali, Burmese, Urdu, Khmer and Pashto.

The 2008 Secretariat Report notes that considerable progress was achieved with the launch of the web site in 2008, following market research in 2006-2007. During its first 11 months the site hosted nearly 24,000 visits – although visit duration did not increase significantly. Major partners including ACFID, ALNAP, the One World Trust, ECB and ReliefWeb all carry prominent links to HAP. However referrals from Member agencies' web sites were disappointingly few.

3.3.2 Questionnaire responses

Various Members' responses:

- "HAP is increasingly being recognized as the rallying point regarding accountability to beneficiaries."
- HAP should strengthen its advocacy towards donors "to incorporate accountability with equity". HAP should increase its presence in relevant meetings.
- HAP's advocacy in Australia should be strengthened. Could not research centres such as the ODI and the Feinstein International Centre do more to promote HAP?
- HAP's advocacy could be more effective "Maybe with a stronger engagement with the UN reform".

Medair: "At the beginning, there was a sense of enthusiasm and cooperation as organizations go to grips with exploring humanitarian accountability, but this has gradually been lost...In striving to professionalize, publications have become less of a true reflection of the messy reality of humanitarian work and therefore perhaps less relevant and useful."

"Progress has been made in the English-speaking humanitarian sector; much work needs to be done to make humanitarian accountability principles widely disseminated...in other languages...and this should be done in collaboration with other relevant actors" (Medair)

Christian Aid: "HAP would need to be very clear when it is HAP's own advocacy position, and which positions it takes on behalf of its members. We are members of HAP but it does not necessarily follow that we would agree with all HAP's advocacy work...Similarly there are already instances of CA being named in the press because we are listed as HAP members...for press releases that we have neither seen nor approved." A large northern-based international NGO comments: "We have had mixed experience with HAP advocacy. At the launch of the HAP Standard in Geneva in 2007, the HAP ED emphasized the need for humanitarian accountability by using an emotive example...This has the effect of shocking the audience...but actually had very little to do with improving humanitarian accountability. Members of the audience were seen leaving the room confused about what accountability was..."⁵

CARE International: "As long as HAP is perceived by outside agencies and many of its own members to be promoting certification without developing a common understanding of what HAP's mission actually means in practice for its diverse membership, it will be difficult for members to deliver a coherent advocacy message."

3.3.3 Secretariat

The ED explains that HAP pursues an "insider reform strategy", with messages aimed at leaders and managers "in the system whom we try to induce through a combination of moral exhortation and risk management incentives". As regards output and results he observes: "When you map all the conferences, meetings and events in which HAP staff promote the accountability agenda in general (advocacy) and HAP's quality assurance scheme in particular (promotion) it adds up to a relatively large amount of effort for a very small organization...I think we can be fairly pleased with our more recent progress within the sector."

Other Secretariat staff raise a number of issues:

- "Most within the sector understand downward accountability and its importance but what they don't see is the role that HAP has...in working to promote it."
- Clear relationships are being made with the media"
- The "current decision not to participate in various fora means we lose lots of great advocacy opportunities."
- Our advocacy needs to be "more strategic and more public"
- "We should have got ourselves to the position where we are regularly invited to speak at significant meetings...As it is, our success in this area is somewhat patchy and the capabilities of a number of senior staff are not being capitalized upon. It is seen not to be a priority in terms of expense."

3.3.4 Conclusions and issues of concern

- The 2007 and 2008 HAP Secretariat Reports provide evidence of considerable activity and public awareness results;
- A start has been made on translating basic materials into languages other than English: in 2008 the HAP Standard was published in Urdu and French and the Benchmarks were published on the HAP web site in Arabic and Bengali. The Principles of Accountability were also published on the web site in Bengali, Burmese, Urdu, Khmer and Pashto.

⁵ The Secretariat challenges the accuracy of these responses.

- The 2008 Secretariat Report notes that considerable progress was achieved with the launch of the web site in 2008, following market research in 2006-2007. During its first 11 months the site hosted nearly 24,000 visits – although visit duration did not increase significantly.
- Advocacy and communication are clearly areas where HAP “punches above its weight”. With very limited resources HAP has added content and volume to the efforts of several agencies to push accountability to beneficiaries up the agenda.
- However, the substantive basis of strategy underpinning this part of the MTSP (i.e. what is HAP advocating *about*?) is somewhat thin: “Advocating on behalf of the intended beneficiaries is recognised by the sector as an important and valuable role for HAP.” But what are HAP’s specific advocacy messages?
- Advocacy (for beneficiaries) has become entangled with – and possibly to some extent identified with – advocating for HAP (i.e. promotion).
- As is the case with research, HAP’s advocacy and communication work has scored successes but the opportunity provided by the current strategic planning process should be used to revisit and redefine the purpose, nature and resourcing of the strategy. Who are the key advocacy target audiences and what are the most appropriate messages?

4. Development

4.1 Membership (Strategic Plan 10.5: “Growth of Membership”)

4.1.1 Targets and progress

Full membership of HAP is open to legally-registered, financially accountable, not-for-profit agencies which “have an organizational commitment to the provision of impartial humanitarian assistance or emergency relief” and commit to the following obligations:

- Implementation of HAP’s Accountability Principles
- Preparing an Accountability Work Plan and reporting annually on progress
- Participating in HAP’s New Emergencies Policy
- Reporting to HAP on complaints handling procedures
- Paying an annual membership fee (see below “Costs and disadvantages of membership”).

The 2007 – 2009 Strategic Plan recognized that “Participation in HAP must be increased. Systemic changes require widespread involvement.” The Plan (which was adopted by the Board in 2006) included the objective of creating three levels of membership: Associate Member, Certified Member and Partner. The aspiration was that “the main body of HAP should be Certified Members”. By 2009 there should be 44 Registered Associates representing 18% of NGO humanitarian expenditure, 36 Certified Members and 25 Partners. However, this was not to be achieved within the Plan period.

Membership categories

In April 2007, despite the Board having adopted the Strategic Plan, the General Assembly rejected the objective of reforming membership categories. The ED acknowledges that the case was insufficiently explained to the members and that “...if the Secretariat is seen to be the primary motor, the big agencies get suspicious and nervous”. The Chair’s communication to Members (email dated 30th April 2007) reads as follows:

“Proposed change to create a Certified Member category: The General Assembly felt it was not necessary to create a new category for Certified members. It did however full agree with the Secretariat that organizations which have successfully Certified – and expressed the wish to become a full Member of HAP – should not be required to go through the whole regular process of application. The GA agreed to modify the HAP Statutes accordingly.”

There are currently 38 Members of HAP: 31 Full Members and seven Associate Members. Six agencies became founder Members in 2003 (although more than 20 agencies had participated in the initial meeting at which the Humanitarian Accountability *Project* was succeeded by the Humanitarian Accountability *Partnership*).

The first Full Members in December 2003 were five northern international NGOs – CARE International, the Danish Refugee Council, Medair and Tearfund – and one southern agency: OFADEC (Of-

fice Africain pour le Développement et la Coopération). Three more agencies became Full Members in June 2004: Oxfam GB, World Vision International and WCRWC (the Women's Commission on Refugee Women and Children). Two more agencies became full members in 2005, three in 2006, four in 2007, nine in 2008 and four in 2009 (as of March 2009).

Of the 31 Full Members, 22 are secular or non-confessional and nine are faith-based agencies. Medair and other faith-based agencies see humanitarian accountability as "very much and outworking of [their] values and mission statement". Secular/non-confessional agencies also state that HAP's Principles are very much in line with their ethical and principle-based approach to humanitarian and development work.

Nine of the 17 agencies that became Full Members during 2007 – 2009 were southern organizations working at national or sub-national level. Eight were northern-based agencies working internationally.

HAP's footprint

The great majority of Members, including those working at national and sub-national levels, are Anglophone (in the sense that their HQ staff work in English as their first or second language). Of the national/sub-national Members, four are based in Asia, one is based in the Middle East, one focuses on Palestine and one is based in Africa. There are no Members from Latin America or the Caribbean. Of the Asia-based Members working at national/sub-national levels, three are in Afghanistan, Bangladesh and Pakistan and one in the Philippines. There are no HAP Members in India, China, Sri Lanka or Indonesia.

Most Members' headquarters are in the "Global North". Two of the Members working internationally have their HQs in the South – MERCY Malaysia and OFADEC.

Two important international humanitarian actors – Médecins Sans Frontières and Action Aid International – are not members of HAP. MSF follows a policy of remaining independent of NGO networks. Action Aid is reviewing its position.

4.1.2 Members' responses

How does HAP membership benefit an agency and its work?

A founder Member cited two reasons for joining HAP: it was a "natural development" following discussions in the aftermath of Rwanda; and the interest of the agency's back donor "was also an encouraging factor". The majority of responses emphasised the positive impact of association with HAP on agencies' policies and practices and the (hoped-for but not yet fully demonstrable) impact on beneficiaries. A few also mentioned the significance of back donor "interest".

The most frequently mentioned benefits to the Members' policies and practices are:

- Improved programming quality (in one case this is validated by external evaluations of the agency);
- The provision of tools and access to other organizations' experience of "work with accountability";
- The "disciplining effect" of trying to manage accountability;
- HAP membership "is an opportunity for our organization...to raise the collective voice from grass roots";
- Many Members refer to HAP's capacity-building services as providing significant benefits;
- One Member speaks of "a real improvement in...participation and information to beneficiaries. It allows us to build confident relationships with beneficiaries".

Concern observes that "Through workshops on the HAP Standard and carrying out HQ and field Baseline Analyses, there is an increased awareness and understanding of what being accountable to the targeted communities, as well as other stakeholders...means in practice. The self-assessment exercises against the six Benchmarks are proving to be effective..."

Among the big international NGOs, CARE International has been involved with HAP since its inception. The agency's former Secretary-General believed that "as a member of HAP International,

CARE's credibility in humanitarian relief [would] increase by promoting and strengthening its accountability, standards and principles." CARE staff "are comfortable with HAP's Principles and the Standard" since these are aligned with CARE's own Programming Principles. HAP "provided a very useful starting point for developing CARE's Humanitarian Accountability Framework" and has created "greater awareness of staff about humanitarian accountability in some of the countries where there have been NEP deployments".

One national-level umbrella aid organization states that membership of HAP and access to the HAP Standard and expertise has helped it strengthen its own standards regarding accountability to beneficiaries.

Membership has helped ensure that the agency's "deliverables are imparted correctly to beneficiaries; initiating more interaction with the community in terms of assessing needs; paying more attention to disaggregation (by age, gender, occupation, place of origin etc)."

"CAFOD has benefited from peer discussions and support from other HAP member agencies and staff..."

In Christian Aid, "The trickle down has been slow...but as a result it is difficult to identify how the quality of our work has been affected. Similarly, because our membership is part of a whole move by Christian Aid it is difficult to identify what improvements are directly attributable to HAP."

Why choose HAP?

Member respondents appear to recognize that HAP offers particular benefits which are not duplicated by other quality and accountability systems. More than one Member is linked with other accountability standard initiatives. For example, Church World Service Pakistan – Afghanistan "is certified with ISO 9001: 2000; and USAID Management Standards. We are also the focal point for SPHERE. Since [CWS Pakistan – Afghanistan] is committed to further strengthen accountability...HAP is considered to be the most suitable standard in addressing the Q & A requirements for us as a humanitarian organization".

"HAP membership has assisted in terms of running our programmes more efficiently, ensuring that our employees adhere to certain standards. It has increased our image of reliability and has helped in our fund-raising efforts".

Membership costs

In April 2009 HAP reduced the membership fees to CHF 2,000 (€1,343 or \$1,722) for agencies with annual expenditure greater than CHF 5 million (€3.35 million or \$4.3 million), and CHF 500 for those whose annual expenditure is less than CHF 5 million.

Opinions are divided and several respondents conflated their observations about membership fees with the fees that HAP charges for its various services. One large Northern Member agency recognizes that the costs of membership "are reasonable. We are aware that we get more service than we pay for". Muslim Aid finds that "for a small organization...the cost is on the higher scale". Several Members, including big Northern international NGOs with large budgets, caution that "we need to see genuine value for money in terms of membership etc. For example we need more practical field support for our money." One major international NGO stated that the (financial) cost would be a factor (though not the predominant one) in deciding whether to continue membership.

Disadvantages of membership

None of the responding Members reported significant disadvantages of membership *per se*. The volume of documentation and the issue of language were mentioned by the francophone Member. A typical response was "The initial inputs require a lot of time, training and finance. Something as simple as translations of communications to a local language can put pressure on the budget."

Christian Aid reports "It has been a very time-consuming process (i.e. consultation on the Standard, becoming a Member, committing ourselves to Certification etc.) and we have been able to engage

only by committing pretty significant amounts of staff time to it. We are pursuing a number of accountability initiatives and HAP membership is only one part of the work we are doing – we do not expect HAP membership to be the single answer to CA’s accountability work.”

CAFOD notes: “HAP Secretariat staff have sometimes found difficulty in understanding how CAFOD operates and how our partnership base works. A sensitive approach is necessary to ensure that HAP is used by the agency in the best way that fits the agency.”

The Secretariat’s response to these comments is that they refer more to the cost of being accountable than of being a HAP Member.

Understanding HAP’s membership

A thoughtful response from one Member points out that the increase in membership is evidence of growing visibility and perceived credibility. However, this Member warns, HAP should research and analyze the reasons why organizations choose not to join HAP.

Working “with” and “through” partners

Several members, including some which are Certified or enrolled in the Certification process, refer to the distinction between agencies that are primarily operational and those that work with a partnership base (e.g. CAFOD’s response, above). The use of language is important here. Some agencies refer to “working *through* partners”, implying that the partner is an agent or sub-contractor (although HAP does not consider agency partners to be sub-contractors). Others “work *in partnership*” with local NGOs, implying a more balanced relationship. It is important to ensure that the Standard and the Certification process are capable of being applied to all three modes of working – direct operational; local NGOs-as-agents, and local NGOs-as-partners.

4.1.3 Secretariat responses

HAP’s mission is “collective self-regulation”, thus the Members are both the subject and object of the organization’s work. The membership basis gives legitimacy to HAP’s work. Some of HAP’s outputs and approaches result from participatory work with Members, though others “rely heavily on Secretariat expertise”. There is an ambiguity here which is explored later in relation to Governance. HAP is a membership-based organization but it appears to be membership-owned and membership-driven to a limited extent. This puts many Members in the role of clients and places the Secretariat in the double roles of service provider to and “servant” of the membership. The Executive Director has stated that “the members are not the mission”.

Membership targets “have consistently been too high in the past” (Secretariat respondent). The Secretariat has learnt that the influence of a small organization like HAP depends on developing products that attract membership from within the wider humanitarian system. Several staff acknowledge that the proposal for reforming membership categories was poorly handled.

Progress has been achieved since 2008 with the development of the HAP Services and Prices list which sets out the criteria for responding to requests and for the fees charged. Can take-up of services be limited by Members reserving funds for the Baseline Analysis and training related to Certification? The Complaints Handling Unit finds that demands for its workshops have exceeded the Unit’s capacity and some requests have been rescheduled for 2010. Cost recovery can put staff in the uncomfortable position of being salespeople according to one respondent. However, the costs to smaller and less well-funded NGOs are subsidized.

4.1.4 External responses

The “HAP or AP” debate

At the 2009 General Assembly, the question was raised as to whether HAP should broaden its mandate to include development work as well as humanitarian response. HAP’s Vice-Chair advised that this was a possible debate for the future, not now.

Several external respondents commented on the appropriateness of HAP membership for their agencies. ICCO Church in Action (Netherlands) considers applying for associate membership. If HAP were to broaden its mandate to include accountability in the development and well as the humanitarian sector, full membership would be appropriate for ICCO. "As an ISO-certified organization, the strategy is to incorporate HAP elements...into the existing policy system and not to design a separate system for accountability and do separate HAP audits...a HAP Baseline [Analysis] would be useful..."

The UNIFEM respondent would also regard HAP's focus only on the humanitarian sector as an obstacle to membership.

Among the Oxfam International (OI) Humanitarian Consortium members (Oxfam America would consider membership of HAP helpful "in systematizing our commitment to accountability principles and in implementing them...in a more systematic way". However, "The certification process and the adherence to the principle of neutrality as a tertiary principle with HAP" would make membership inappropriate. Oxfam Novib (Netherlands), Oxfam Intermón (Spain) and Oxfam Australia express similar reservations. The Humanitarian Director of Oxfam International would welcome a closer OI engagement with HAP (although this is not an official position) and points out that the decision about applying for membership is up to each affiliate individually. However he also points out that the certification process would be a "real obstacle" for OI. (Oxfam GB is a founder member of HAP.)

For HelpAge International, which is developing an Accountability Framework incorporating the HAP Standard, "membership continues to be considered by the organization".

4.1.5 Conclusions and issues of concern

- After a slow start, membership is increasing, especially among Southern national and sub-national agencies (as is evident from HAP's August 2009 e-mail newsletter).
- All Member respondents appreciate the benefits of membership of HAP. There are some concerns about the financial costs and that fact that HAP meetings take place in Geneva means that some Members find it difficult to remain as fully engaged as they would wish.

There are two main areas of concern in relation to membership.

1) The need to grow membership strategically

The target set in the 2007 – 2009 Strategic Plan was for three levels of membership:

- 80 registered agencies representing 18% of NGO humanitarian aid expenditure;
- 44 associate members;
- 36 certified members.

Even allowing for the difficulties arising from the General Assembly's rejection of the proposal to reform membership categories, during the two-and-a-half years of the 2007 - 2009 strategic plan full membership has only grown by 18 from the who were full Members 16 at the end of 2006.

The distribution of HAP membership is unbalanced, with significant geographical gaps (Latin America, India) and cultural gaps (the preponderance of Anglophone Members). The strategic thinking behind list of "target members", with staff assigned to encouraging agencies to apply is unclear. Regions, countries (especially chronically disaster-prone countries) and types of humanitarian agency should be systematically analysed and prioritised. One staff person with the appropriate talents should be assigned to plan and lead membership recruitment, in close collaboration with colleagues responsible for Organizational Development and Certification. The spurt in membership growth during the past half-year and the demand for Baseline Analyses will create a log jam in 2010 if all the new Members enrol for Certification. At present the Secretariat is not equipped to handle the anticipated demand (without diverting staff from other work).

2) The roles and obligations of Members

The original expectations, namely that HAP Members would actively fund-raise for HAP and engage energetically in HAP advocacy, have not been adequately fulfilled. The growth in smaller, southern-based Member agencies could put the membership more in the role of client than owner.

Relations between the Secretariat and some of the large international NGO Members – which would have the resources to be able to support HAP more actively – are strained. Two such agencies (Oxfam GB and World Vision International) resigned from the Board of HAP and no longer play a strong part in HAP’s governance. The Secretariat has pointed out that some members are failing to meet their obligations with regard to Accountability Work Plans and Annual Reports. However the ED has concluded that “Since 2007 I have taken the view that we should really systematically avoid confrontation...”

A carefully conducted and well-planned and presented review of the membership basis of HAP, in which members are widely and effectively consulted, could provide a platform on which to redefine the expectations, roles, responsibilities and relationships surrounding the issue of membership. On this basis it might be possible to develop a coherent proposal for inclusion in the next Strategic Plan which would stand a better chance of winning General Assembly support in 2010.

Two specific issues of concern are the (alleged) disjoint between HAP’s “Humanitarian Covenant” in the HAP Standard and the Red Cross Code of Conduct for NGOs, which is addressed above in section 3.1.3 (the HAP Standard); and the status of compliance verification through the HAP Certification process, which is addressed below in section 5.2 (Certification and accreditation).

4.2 HAP in the field: New Emergencies Protocol, Capacity-building and Roving Teams (MTSP objectives 10.2 and 10.15)

4.2.1 Targets and progress

The MTSP 2007 - 2009 states “Driven by the need to put the Accountability Principles into practice, HAP must enable change at the practitioner level”. The New Emergencies Protocol was initiated in 2006 to give substance to this objective.

Capacity-building was defined in the MTSP as increasing “an organization’s ability to put...ideas and processes into practice. Capacity-building by HAP will be through the provision of training and consultancy services, using a variety of tools...drawn from good practice observed and captured in the field.”

The MTSP set four “measures of success” for this component:

- HAP advisers in all new emergencies and several ongoing complex emergencies
- Advisers provide training and support certification
- Enlisting new associates
- 6 full-time equivalents with this function

Already in 2005, HAP had maintained a field support team in Pakistan, funded by DFID, Tearfund, Oxfam GB and Care International and hosted by World Vision Pakistan. “The HAP team noted increasing awareness of quality and accountability issues among the staff of member agencies...New, innovative and practical steps were taken by some Members to set up better information and feedback systems. Others ensured that resources were allocated for recruiting dedicated quality and accountability staff.”⁶

Despite the fact that two Members withdrew from benefitting from the HAP team’s support, and other discouraging aspects, HAP counts the Pakistan intervention as a success. The factors contributing to this were:

- An established HAP presence soon after the emergency
- Constructive support from donors, media and survivors for better quality services
- Flexible support to members “with a good mix of bespoke and generic services” (2006 Annual Report)

In January 2006 HAP deployed an accountability adviser in Darfur, hosted by Tearfund, followed by field officers and support staff. “The original project objectives were revised in June 2006 after it became apparent that demand for the services...was lower than originally anticipated, due chiefly to unusually high staff turnover...The Sudan HAP team made a significant contribution to HAP’s re-

⁶ For a fuller account of the Pakistan and Darfur deployments, see the HAP Humanitarian Accountability Report, 2006

search and standard development projects, culminating in an awareness-raising exercise...Over 500 beneficiaries and their representatives were briefed on their rights and responsibilities...Many beneficiaries informed HAP that they had not previously been aware of these rights and that they felt more confident to engage with NGO staff afterwards.” (2006 Annual Report)

HAP acknowledges the lessons of the Sudan deployment: unrealistic expectations, difficult logistics, insecurity, mixed levels of engagement, slow recruitment and a sense of isolation from the HAP Secretariat.

HAP’s experience in Aceh was also mixed. HAP helped recruit an Accountability Coordinator who was based in Oxfam GB’s team and expected to allocate 25% of his time to HAP members. This arrangement ran from April to October 2006. HAP acknowledges that it “should have played a far greater role in encouraging more collective efforts to promote compliance with the Accountability Principles”. Reviewing the Pakistan, Sudan and Indonesia deployments, HAP concludes that agency commitment at leadership level is essential to establish a culture of accountability. HAP members have made a formal commitment to the Accountability Principles but “not all see it as a priority and, as a consequence, some members made no demands from HAP’s capacity-building, monitoring or research services”.

By 2007 the implementation of the New Emergencies Policy had gathered pace, with the development of a new field methodology based on a review of the NEP, the recruitment of a Roving Team, with specific terms of reference and a cost recovery strategy. HAP’s field presence in Pakistan and South Sudan continued and new deployments in Bangladesh and Kenya “raised the profile of humanitarian accountability and allowed for immediate and widespread mobilisation of people and ideas.” Joint activities with Sphere, Groupe URD, the IAWG, the Listening Project, the Somali Support Secretariat, the Somalia NGO Consortium and the IASC took place or were planned for work in Afghanistan, Kenya, Pakistan and Somalia.

The targeted and demand-driven basis of the Roving Team approach meant that members contributed over 80% of the costs of HAP’s NEP field-based activities. (HAP 2007 annual report)

HAP remained active at field level in Pakistan in 2008 and deployed teams in Bangladesh and Myanmar, in collaboration with and/or funded by Sphere, Concern Worldwide, CWS Pakistan/Afghanistan, DFID and SCF UK. “Remote guidance” was provided at members’ requests in Somalia, South Sudan and Kenya. The Myanmar cooperation with SCF is currently being evaluated by DFID. (HAP 2008 Annual Report)

4.2.2 Members’ responses

Three of the 13 Members who responded to the questionnaire mentioned HAP’s field-level work as a strategic success. Some commented generally on “the usefulness and value of the services HAP offers” and did not necessarily specify field-level services such as the work of the Roving Teams or Capacity-building. Such “generic” comments included:

- “They are of high professional standard and have been instrumental in the improvement of the quality and accountability of our work” (identity withheld)
- “HAP offers..a very practical guide to ensure policy, procedures and practical actions [correspond] to the HAP Standard and that also relates to the organizational capacity-building” (Muslim Aid)

Concern Worldwide reports that the training of Concern staff by HAP staff on “how to conduct a field baseline in Kenya was very useful”. Medair points out that “the Myanmar joint deployment shows that HAP is not acting alone”.

A Member agency comments: “In a few of the deployments of the HAP staff to emergencies their focus has been monitoring non-compliance against the HAP standard, whereas the priorities in the field were capacity-building; hence meeting these two priorities within the time limits has been a challenge both for the HAP staff and the hosting agencies.”

Christian Aid responds: “Technical training...(particularly facilitated self-assessments with our partners) have been very useful...the services that HAP offers are useful, particularly in terms of training,

though of course they can vary in quality according to which staff are delivering them...Sometimes HAP staff seemed to find it quite difficult to tailor their services/trainings and approaches to individual members' needs and this can dissuade us from using them: this can be of particular consideration when introducing partners to HAP/accountability."

The two most substantive responses from Members gave HAP's field-level work "mixed reviews":

- CARE comments that "...field staff have found some of the NEP deployments extremely useful, though experience has been variable. Where deployments have been well-prepared, with clear ToRs and knowledgeable staff leading them...these have clearly achieved their objectives. However, there are also examples of deployments that have taken place without ToRs (or at least which were not made available) and/or by HAP staff who lacked requisite skills and competencies. Outcomes and follow-up have also been inconclusive at times (e.g. the Somalia NEP deployment)". "NEP deployments to Pakistan, Bangladesh and Myanmar have been reported by CARE staff to have been very helpful. These seem to be particularly effective when this coincides with a "Standing Team" deployment...There are examples where a Standing Team member has been deployed to an emergency who then collaborated virtually with HAP and included an inter-agency workshop on humanitarian accountability."
- A major northern Member agency (identity withheld) comments that "The capacity-building opportunities for field and HQ staff, training and coaching have been useful and contributed to building sufficient capacity." However, this agency also comments on HAP staff **[in one deployment]** as displaying "an aggressive style" and treating local staff with inadequate respect "for example, demanding that they attend meetings with little notice for long stretches of time without attention to need for food, drink etc. In certain instances the practical experience and relevance of the technical advice was questioned and found not so useful. The outcomes of those recent trips have not been very result-oriented either...in meeting the request of the field agencies for specific, topic-focused capacity-building. They all completed HAP reports...with not sufficient time allowed [for] feedback by agencies...Challenges were also faced when commissioning HAP-Sphere joint visit, when competing agendas of the two initiatives were quite visible to staff on the ground".

Despite these concerns, however, the same agency calls on HAP for "More practical field support for implementation, to build the body of experience and case studies."

4.2.3 Board members' responses

Four of the eleven (current and former) Board members who responded to the questionnaire referred to HAP's fieldwork and capacity building:

- "Getting into the field and doing training workshops, on-site capacity-building etc. [have] been valuable. Most HAP staff are really intelligent and have ample field experience, therefore they speak with authority."
- "Providing good support to the field to humanitarian agencies during some recent emergencies" ranks as a strategic achievement. The field work and capacity-building of HAP has, by and large, been very effective in demonstrating real value-added of HAP to its members. It is disappointing that this component of HAP's work has not been given even more priority."
- A former Board member notes that at the beginning, "Members were highly reluctant ...to welcome HAP staff during crisis response...but this may very well have changed".

4.2.4 Secretariat staff responses

A self-critical perspective on HAP's achievements in this area characterises the Pakistan, Bangladesh and Myanmar interventions as "very important achievements", while Aceh and Darfur were "fairly awful setbacks". The ED feels that the NEP "has been over-focused on Members" and that HAP has never been able to establish itself as an "in-the-field independent complaints handling body or as a 'system-wide' compliance monitoring mechanism". The "collective awareness raising" approach did not achieve very much in Pakistan and HAP should be wary of falling into the "training trap" ("lots of free training...and probably not much real change").

The programme is still not sufficiently demand-driven: "even now, with Pakistan and Sri Lanka high up in the news, it has been the Secretariat once more convening the NEP meeting rather than the members."

Overall, the ED thinks that “without the NEP, HAP would really have never been in a position to know how big the challenge is...the notion of the ‘roving team’ is essential from the point of view of coherence and institutional learning but it is very hard on the individuals concerned...The logic of the NEP is as strong as ever and [HAP] must continue to...have a direct presence in major emergencies.” Another response cites four ways in which the NEP objectives have been realized:

- Demand-driven deployment of the Roving Team
- Cost recovery in NEP deployments, specifically in relation to Certification
- New membership resulting from field level interaction
- Working closely with focal people in HAP member agencies (for example in Peru).

The same respondent points out that staffing the NEP is difficult: it requires a high level of understanding of HAP and other Q & A initiatives, of the humanitarian system and its reform process, UN and bilateral donor approaches. It requires staff with high levels of initiative-taking and negotiating skills, self-confidence and willingness to spend extended periods in the field.

Another staff member comments that “the NEP should be both responsive (when an emergency occurs) and strategically positioned in areas where hubs exist.” The same staffer urges that field-based training should be linked to other activities such as Baselines. This view is reinforced by a colleague who “wonders if NEP could be replaced with a strategic focus on countries based on potential for new Members.”

The NEP has been a learning process “and the way it has been operationalised has changed with changes in staff”, which reinforces the need “to get our model right”. HAP should have a stronger and more consistent field presence – perhaps through regional teams, if funding were available.

The Pakistan team leader and team were poorly managed from Geneva. However the reaction to the closure of the Pakistan team office “has shown that members in Pakistan valued their input and support.

Feedback from Bangladesh “suggests that the learning did not stick and that senior country personnel were not sufficiently engaged.

Another colleague shares the ED’s concerns about the “training trap”: “We are about organization change and as such there is no point in training masses of individuals...We need to get into organizations and work...within to enable them to make the changes necessary.” However, a slightly different perspective is that “HAP trainings are recognized by participants [as] the best and most efficient they have been attending.” This level of enthusiasm did not decrease when cost recovery was introduced.

A former Secretariat staff member believes that the NEP deployments so far “made a big difference in terms of raising awareness of accountability issues...In terms of actual difference to quality of service to beneficiaries...a difference was made but not a huge one.” The Pakistan deployment was seen as “one of the most appreciated parts of the HAP work, as it was seen as practical and helpful.”

A current staff member’s response includes a useful review of NEP progress against its original objectives:

- Develop a framework: the NEP needs updating based on experience; it has developed organically;
- An exit strategy with clear criteria: currently the exit strategies are per deployment;
- Recruitment of staff and consultants: a roving team has been recruited but “how realistic is it to find experienced staff who are willing to travel for nine months of the year?” The network of trained consultants not developed;
- Providing tools to Member agencies and (later) helping Member change their QM systems: the NEP’s emphasis is still more on the first goal;
- Field-testing tools: several tools tested, e.g. guided self-assessments but “we have not developed and tested specific tools related to each of the Principles or Benchmarks that could be applied in a new emergency”.
- Support for certification as part of paid-for services: “On an NEP deployment we would not necessarily actively promote certification (given we often need to communicate key immediate

messages within a limited time) but we would let staff know it exists and where they can find out more.

- Ensure that beneficiaries have effective complaints mechanisms: this is built into an NEP deployment along with other aspects of accountability such as participation and information-sharing.

The same staffer concludes: “The New Emergencies Policy represents members’ commitment to make a ‘special effort to apply the Principles of Accountability to humanitarian beneficiaries in new emergency situations’. While this...can be measured at a global level by certification...it is harder to measure on a specific emergency basis.” This staffer states that HAP does not have a means of reviewing members’ efforts in the absence of an NEP deployment. However, this appears to ignore the Baseline Analysis, AWP, Certification and other mechanisms for reviewing Members’ measures to improve accountability.

HAP in Pakistan

“In the absence of the HAP 2007 Standard during 2005 -2007, the focus of the Pakistan team remained on generating awareness about humanitarian accountability among the Membership senior managers and other staff, their partners, host authorities and other stakeholders.” (Secretariat staff member). The team’s work contributed to attracting new Members. The staff member concerned points out that “the willingness of a Member to engage with HAP staff depends on:

- Genuine commitment – at policy level;
- Level of understanding – among focal persons and senior managers;
- Bureaucracy – especially with large organizations with complex and slow decision-making processes;
- Leadership – country programme level leadership is essential.

From the Secretariat’s point of view, uneven levels of commitment among members was clearly a source of considerable frustration. At the same time, there is recognition that “one size doesn’t fit all” and that future NEP deployments would need to develop tailor-made services that are appropriate to individual members and to the national/local circumstances. HAP’s presence in Pakistan evolved from an NEP deployment into a field office, which was seen as a potential accrediting body for Pakistan and elsewhere. HAP faced difficulties in registering itself in Pakistan. Funding – which was initially from the Members – decreased in the second phase when the Project had to rely on funds from the HAP Secretariat budget.

HAP’s mission in Pakistan was reviewed at mid-term by an external consultant in May 2006.⁷ The project was “relevant and on the right track, with several outputs achieved and others lagging behind due to constraints of time” and other factors. Partners were satisfied with HAP support and agreed that the focus on accountability “has contributed to the change of attitude among staff members”. Only one member had prepared an implemented a local accountability work plan. Several members had the intention to do so but were delayed by rapid personnel changes. Others believed that their overall (agency level) accountability plans were already incorporated in their strategies and that developing local account ability plans would be an unnecessary additional task. The review pointed to advocacy as an area in which HAP needed to be more proactive. On the whole, however, HAP’s role and performance was reviewed in positive terms while the degree of “accountability readiness” among members was variable.

Capacity-building

“...we have offered ad hoc training and services without helping agencies to first work out a strategy for mainstreaming their commitments systematically from HQ to field level...HAP [did not] have experienced enough staff able to engage with senior management at field level...too much effort with the bigger agencies taking up limited resources.”

Roving teams

The decision to focus the roving teams rather than expand the number “was linked to funding constraints rather than strategy”. With just one roving team, “the focus has been very much on building member capacity, but with additional teams there could have been greater opportunity to undertake independent monitoring...Additional teams would also have allowed for staff with different language capabilities...the trade off is between being able to realistically offer support to members and ensuring the onus is on the members to improve their own accountability from within. While the roving team

⁷ Anika Krstic: Mid-term Review of HAP’s Quality and Accountability Promotion Project in Pakistan, May 2006.

increases HAP visibility at country level...it is important to ensure that HAP does not replace agencies' internal drive and dedication of resources to strengthen accountability."

Remote guidance

CARE International confirms that the "virtual support" HAP provided to a mission to Peru following the August 2007 coastal earthquake was valuable but that it could have been more valuable if HAP materials had been available in Spanish.

However, a staff member says "there is little evidence and I am not convinced that remote guidance is a viable option, for a number of reasons:

- Little take-up; cultural and language barriers (the service depends on phone and e-mail contact);
- Without HAP presence on the ground there is an "out of sight, out of mind" effect;
- Difficult to measure impact – little evidence that the support has been utilized.

4.2.5 Other responses

A World Vision manager of field operations reports "We have had excellent cooperation and support from the HAP roving team and field representatives...HAP' support is a large contributing factor to the successful uptake of accountability in [the food aid management area]..Additionally in other emergencies and non-emergencies we have coordinated very well with HAP field services."

A field manager for Mercy Malaysia find that "the workshop on developing self-assessment has been really useful. Setting up an accountability working group in the field also encourages non-members and members alike to share good practices." The DCA's respondent found the accountability/CRM training "relevant to the work of DCA and its humanitarian partners. The quality of the training can be further enhanced by developing action planning tools." The consultation with HAP Members' representatives (in Ethiopia) led to the creation of a network of HAP members.

4.2.6 Conclusions and issues of concern

Through its New Emergencies Policy, HAP has achieved considerable impact in terms of:

- Significant presence in a number of major emergency response locations
- Influencing the field-level accountability practices of members
- Providing training to member agency staff and the staff of their local partners
- Recruiting new members
- Field-level activities can enable the development of HAP's policy and regulatory services to remain "grounded" in the untidy and stressful realities of emergency response.

All respondents who answered questions about the NEP and HAP's capacity-building efforts were positive about the relevance and importance of these aspects of HAP's work. Such criticisms as there were concerned a) the lack of materials in languages other than English and b) isolated instances of poor conduct by HAP staff in the field (the latter from one member). Several respondents called on HAP to increase its investment in field-level interventions and to do so in a pro-active and carefully planned way, perhaps by deploying resources at regional level or in large countries which are chronically disaster-prone.

The main issue facing HAP in this regard is "what is the strategic point of the NEP and field-level capacity-building services?" Two issues arise:

- First, should HAP pursue the original vision that members "should make a special effort" (with HAP support) in new emergencies, or should HAP recognise that levels of commitment among members will always remain uneven (at best) – especially with a growing membership among smaller, less well-resourced southern members – and that therefore HAP should become the primary actor in NEP deployments? (i.e. leading members rather than pushing them)
- Second, is the purpose of HAP's field-level work during (and in anticipation of) emergencies primarily to bring the Principles of Accountability to bear effectively on agencies' responses; or is the primary purpose to use field-level deployments as a means of attracting new members and promoting enrolment for certification? As one staff respondent said "...we need to better define how the roving team activities under the NEP complement other core objec-

tives...there is much opportunity to undertake a range of work linked to the core objectives but this risks the focus of a deployable team being too wide..."

4.3 Complaints handling (MTSP Objective 10.7) and the **Building Safer Organizations project**

4.3.1 Targets and progress

HAP's Statutes recognize the responsibility "to assist members in finding solutions where concerns or complaints are raised against them". In the MTSP the focus is on developing and providing "expert witness" and arbitration services; setting up a complaints body for certified HAP members and handling complaints against members.

Complaints against members

No complaints against members were received in 2006, 2007 or 2008, according to the annual reports for those years. In the ED's view "this is a reflection on (a) the slow rate of progress on members achieving compliance with the Accountability principles and (b) the decision by the Secretariat to wait until 2008...to publicise the HAP complaints system". In that respect, HAP failed to follow the Benchmark 2 requirement for wide dissemination and understanding, as one respondent points out.

CARE International was the subject of one complaint to HAP, which was forwarded to CARE and which – according to CARE – who felt they had taken the necessary steps in addressing the complaint and provided HAP with a timely response – was not dealt with (by HAP) "very professionally or systematically" (the matter is not yet resolved).

During 2007 – 2008 HAP's focus shifted to building the capacities of member agencies to establish robust internal complaints handling systems, which is therefore the focus of this evaluation. One Secretariat staff member expects that "with the Standard and Certification now well established, more attention [is] now focused on disseminating the complaints against members policy, and two complaints have been received" (in 2009).

BSO in HAP's Complaints Handling programme

During the first year of the MTSP (2007), the Building Safer Organizations (BSO) project transferred from ICVA to HAP. The BSO had originally been created in 2004 to prevent and respond to sexual exploitation and abuse by aid workers. "Its goal was to build the capacity of humanitarian organizations to introduce safer and more accessible complaints mechanisms and to improve the quality of investigations when complaints are received". (HAP annual report 2007).

The BSO merger was not foreseen in the MTSP (which was written and adopted by the Board in 2006). The idea of the merger was reported to the Board in the ED's report in November 2006 and the actual merger was reported to the Board in April 2007. One (Board member) respondent pointed out that the proposal for the merger was not discussed or approved by the Board but appeared to be a decision taken by the Secretariat.

4.3.2 Results, outputs and outcomes

The policy intention of the BSO merger was to integrate the issue of reporting and preventing sexual exploitation and abuse within the broader framework of accountability and complaints handling in the humanitarian aid sector. This was the main recommendation of the study "To complain or not to complain: still the question" that HAP commissioned in 2007 as the "Beneficiary Based Consultation" and which was published in June 2008.⁸ The study, which was based on consultations with beneficiaries in Namibia, Kenya and Thailand, highlighted four main recommendations:

- Situate prevention and response to exploitation and abuse in the overall accountability framework of organizations;
- Create an environment of trust and partnership that solicits complaints and feedback;
- Raise awareness among beneficiaries on sexual exploitation and abuse;
- Create an environment that reduces sexual exploitation and abuse.

⁸ Kirsti Lattu *et al*: "To complain or not to complain, that is still the question" HAP International, June 2008

Within HAP, the BSO merger was seen as “the next logical step in supporting organizations to receive and respond to complaints through a more professional, comprehensive and systemic quality assurance mechanism. The [BSO] project has since evolved into the Complaints Handling Unit of HAP and broadened its goal to general complaints management...while maintaining its focus on response to sexual exploitation and abuse”. Other benefits included attracting new donors to HAP; “bringing HAP’s work “to the attention of a large network of trained complaints investigators...and into new relations with the UN system.” (HAP annual report, 2007)

During 2008 HAP carried out a number of activities to strengthen members’ complaints handling capacities:

- Materials for complaints management workshops were developed and finalised
- Eight BSO Learning Programme workshops were held. Of the 138 participants, 33 completed the Learning Programme during 2008. A follow-up survey revealed that 24 participants had conducted investigations in their organizations and a further 67% had used HAP workshop materials.
- HAP produced the second edition of the Investigation Workshop Training Handbook and the BSO Guidelines...for Humanitarian Workers
- The Investigation Handbook was translated into Arabic and French and a francophone workshop was piloted in Haiti.
- BSO workshop films were subtitled in French and English
- Regional network events were held in Thailand, Jordan and Lebanon. As part of this strategy HAP has played an active role in the UN and NGO Taskforce on protection from sexual abuse and exploitation.
- HAP collaborated with CARE in conducting and contributing funds towards a Complaints Handling Workshop in Jordan, followed by a BSO Investigation Workshop;
- HAP’s Complaints Handling Unit made use of the HAP web site to provide information on upcoming workshops and upload case studies and resources. The Unit’s training schedule and participant database enabled people to register online for HAP events.
- The HAP and BSO newsletters were merged.

In September 2007, HAP commissioned the evaluation of one of its Investigations Workshops, held in Washington DC.⁹ The workshop brought together 19 NGO and one UN participants, mostly at senior staff levels. The evaluation report is generally positive but offers suggestions as to how “minor growing pains” can be overcome in future workshops. Most of the criticisms address generic training and facilitation techniques rather than specifically about content issues.

A HAP donor report for the 2007 – 2008 period analyses significant outcomes as follows:

- Increase in requests for sole agency events from a number of leading international NGOs and a UN agency;
- Post-workshop follow-up indicates that learning materials are used by participants
- In one instance inviting refugees or other beneficiaries proved difficult. In the Middle East investigations workshop HAP was able to invite “persons of concern” as an alternative.
- Developing Regional networks “has proven more difficult than was anticipated”. HAP will continue to focus on the Middle East; elsewhere work with existing accountability networks.
- A BSO workshop participant reported: “Even though our work is in a volunteer rather than staff context, the framework is easily adaptable...”

4.3.3 Responses to the evaluation questionnaire

Four of the Member agencies who responded to the questionnaire mentioned (unprompted) the establishment of complaints handling and response mechanisms as one of the positive effects of their membership of HAP.

Secretariat responses include the following points:

- In the absence of a complaints handling system, BSO-trained investigators “could not do their job properly”

⁹ Kirsti Lattu: Evaluation of the Investigations Workshop, 2007.

- “Complaint handling is identified by agencies [enrolled] for Certification as the second most difficult area to improve on (after developing an accountability framework);
- “Complaints handling has become a topic within each agency, whereas before it was not on the agenda at all. But agencies will need time and resources as much as goodwill to move forward.”
- Baseline Analysis findings should be relayed to the Complaints Handling Unit so that “we can tailor our support to an agency based on their strengths and weaknesses” and “HAP staff who work directly with agency staff need to be aware of the many grey areas...so that they feel confident in answering questions...or know when to tell the person to contact the Unit for information.”
- Starting the Inspectorate project will strengthen the work of the BSO by building in a compliance verification system specifically looking at protection from sexual exploitation and abuse.”

One (external) respondent questioned whether the merger has resulted in limiting access to HAP members (i.e. excluding non-HAP Members who participated in the original BSO Project hosted by ICVA) . This is an issue for HAP’s general communication and dissemination programme and striking a balance between meeting demands from members and from non-member agencies.

Another respondent questioned HAP’s “branding” of this area of work as “complaints management” by pointing out that the corporate sector has a broader approach: “customer services” which includes, of course, complaints handling. In the evaluator’s view this is an interesting theoretical point but not one that HAP should spend much time dealing with. The broader, more neutral approach might be appropriate in the context of development programmes but during a humanitarian response action where urgent choices have to be made, the focus on responding to and redressing “complaints” would appear to be have priority.

4.3.4 Regarding cost-effectiveness

Total expenditure for the “Complaints handling capacity-building” programme in 2008 was CHF 482,216 (\$414,274 or €323,789). Slight under-expenditure in non-staff costs is accounted for by a) the lower-than-planned number of BSO Learning Programmes (eight rather than 12), b) the re-configuration of the Training of Trainers policy and c) the postponement of setting up Regional networks in Malaysia and South Asia.

Staffing and personnel costs

Over the course of 2008 the Complaints Handling Support section comprised the equivalent of 2.7 full time staff, at a total cost of CHF 280,199. This included the cost of a part-time consultant for the BSO Middle East Network. For Geneva-based staff HAP pays approximately 18% social charges. The average cost per person in 2008 was CHF 80,000 (or just over 53,000 €).

Cost recovery

HAP charges between CHF 500 and CHF 2,000 per participant for a five-day residential Investigation Learning Programme Workshop, depending on whether the participant is from a member/n on-member agency and whether the agency is “small” or “standard”. For an agency to send a full team to such a workshop the cost would range from CHF 10,000 to CHF 40,000.

HAP’s total cost-recovery strategy in 2008 realised a total income of CHF 272,312, of which CHF 212,714 was contributed by the Development Services department. Of this amount, CHF15,859 was contributed by the Complaints handling and capacity-building programme.

4.3.5 Conclusions and issues of concern

- The “Complaints against members” programme has barely got off the ground and HAP Members need to decide whether – and if so how – this service is to be effectively launched and sustained.
- However, the integration of the BSO project within HAP has clearly galvanised the complaints handling capacity-building programme and achieved impressive results in a short time and at low net cost

- The extent to which the original focus of BSO (sexual abuse and exploitation) should be merged into a broader complaints management strategy and system is still being debated but the weight of opinion (including the recommendations of the Kirsti Lattu study of 2008) supports the need to address the specific issue of complaints about sexual exploitation within the context of a robust and widely-known complaints handling system.

A concern about the Complaints handling/BSO programme – which applies to other aspects of HAP’s work and indeed to the wider picture of the humanitarian sector’s efforts to improve quality management including accountability – is the shortage of research-based evidence about the relative effectiveness of different complaints response and handling approaches and techniques and their actual impact on beneficiaries’ lives. Until this research deficit begins to be addressed, programmes such as Complaints Handling, including BSO, will continue to be justified on the basis that they are self-evidently “good”.

4.4 Quality management (MTSP objective 10.14, currently integrated into organizational development services)

4.4.1 Targets and progress

“Certification is the process of determining whether an organization has met the standard...The quality management system will help ascertain where the gaps are and where things can be improved...HAP will be able to provide consultancy support in the development of their accountability system/policy.” (MTSP)

The key activities under this programme, which is obviously clearly integral to the Certification process, are:

- Flexible services offered at a reasonable price
- Facilitative process that enable organizations to take ownership of their accountability systems
- Perceived value in pre-audit consultancy support
- Focused advice on methods and tools

The 2007 Secretariat annual report does not mention this objective explicitly. However in relation to “HAP Quality Assurance Certificates”, the report notes: “HAP’s work plan anticipated seven certification audits during 2007. This target proved to be over-optimistic because it under-estimated both the amount of time that members typically take to decide whether or not to seek certification. And the preparation time required...a process that takes between six and ten months.”

The 2008 Secretariat annual report notes a number of activities designed to support agencies improve their accountability systems and move towards certification against the HAP Standard. These included:

- The HAP Peer Support Group meetings through which HAP staff met with agencies’ accountability focal persons. A meeting in December 2008 brought together representatives from 19 agencies. “The meeting focused on...quality and accountability in recent emergencies; tools and approaches used by HAP member agencies to improve accountability...[and] case studies of change management in strengthening accountability in their organizations.”
- Introductory meetings were held with eight new members and one non-member agency to explain baseline analyses and certification audits;
- Eight members received feedback and support on their accountability work plans;
- 14 agencies requested baseline analyses in 2008, of which nine were completed;
- “Dedicated” support” – i.e. support tailored to the specific needs of agencies was provided in 2008.

4.4.2 Responses to questionnaires

As noted above in relation to members’ views on HAP services, responses are by and large very positive. It was also evident from the plenary and group discussions at the 2009 General Assembly meeting that the interaction of HAP staff with members during the process leading to certification is highly appreciated. Many representatives testified to the impact that the processes have achieved in improving internal policies, systems, attitudes and practices.

Secretariat responses to questions about the Quality Management objective raise the following points:

- “All our work (complaints handling, baseline analysis etc.) is essentially ‘capacity-building for quality management’ and these two components should never have really been separated. The bigger question is whether HAP can scale up its impact through the development of a group of tried, tested, loyal and reliable consultants. So far, the experience of trying to do this...has not overall been very good.” The same respondent points to two specific issues:
 - HAP has not been able to offer “enough work within reasonable time-lines” to consultants, which has limited their learning about HAP;
 - HAP has used the wrong selection criteria for auditors, with too much emphasis on emergencies experience and not enough on organizational development and audit. Do some auditors actually believe in the HAP approach?
- There is significant need for these services and “we don’t do it enough” HAP needs “a pool of consultants...who can give this input because we have underestimated the changes and work an agency needs to undergo.” Specific suggestions:
 - More case studies
 - More short guides to the steps
 - A help desk
 - Networking and asking members with skills to help others
 - Planned trainings

4.4.3 Conclusions and issues of concern

- Responses are by and large very positive. It was also evident from the plenary and group discussions at the 2009 General Assembly meeting that the interaction of HAP staff with members during the process leading to certification is highly appreciated.
- Responses from Members and Secretariat indicate that demand for HAP’s Quality Management Services is high and that HAP needs to scale up its capacity to respond to the demand.

5. **Regulatory Services**

5.1 **Accountability Work Plans and Implementation Reports (MTSP Objective 10.6)**

5.1.1 Background

The MTSP announced that “Accountability Work Plans (AWPs) are superseded by the HAP Standard and by the emphasis on quality management systems. AWP’s should be removed as a requirement for membership. The use of AWP’s should be retained as one tool for Associate members.”

The 2007 Secretariat Annual Report noted that “The strategic goal to phase out AWP’s in favour of certification plans was not pursued following the decision by the April 2007 General Assembly to retain the HAP Statute in its current form. As a consequence submission of and reporting against each member’s own AWP continued to be a requirement for all full members, with certification being optional rather than obligatory. This led to some confusion and frustration when the members that had been working towards certification realised that this did not exempt them from also submitting an AWP.” During 2007 AWP Implementation Reports were received from 17 members. Two long-standing members failed to submit reports.

The standard AWP implementation report format requires members to state their key goals for the year, the achievements and challenges and their objectives for the following year.

The 2008 Secretariat Annual Report notes that the Secretariat provided feedback to eight members on their AWP’s “through briefings or written feedback”. In 2008 21 members submitted AWP Implementation Reports. Three failed to do so.

5.1.2 Questionnaire responses

One out of 16 Member respondents explicitly mentioned AWP: Medair finds that “The discipline of carrying out annual AWP has stimulated the dissemination of humanitarian accountability to all levels of the organization, both at field and HQ levels.”

Secretariat responses on this issue included the following proposal for reforming the AWP issue: Humanitarian Accountability Frameworks should replace AWP:

- Membership requirement: Statement of commitment to the HAP Accountability Principles and a confirmed Baseline Analysis scheduled within 12 months. An introductory visit by HAP staff to help prepare for the Baseline. The results of the Baseline would be reflected in a Responsive Action Plan which would form the starting point for the agency’s Accountability Framework.
- The member would have three months following the Baseline to present the response plan. The plan would include the target date for applying for certification (maximum one year)
- The Accountability Framework (prior to certification) should be publicly accessible.
- The General Assembly meetings would review progress against these steps.
- Certification and progress reviews every 18 months.

This approach would be “more effective, more efficient, roll out the process more rapidly and allow for planning of [support] services”.

The ED also favours reforming the system but, until the General Assembly approves the necessary changes to the Statute (regarding membership obligations), the AWP “remain the only way the Secretariat can monitor progress towards compliance with the Principles of Accountability. However this is a very weak and historically unreliable mechanism and the point of placing renewed emphasis on the AWP is in part intended to convey the implicit message ‘why bother with this approach to compliance verification when you could instead achieve certification?’”

5.1.3 Conclusions

- The future status of the AWP is clearly an issue to be resolved as part of the current strategic planning process, within the wider context of revisiting the issue of Membership obligations.
- The proposal for replacing the AWP with the HAF appears constructive and deserves serious consideration.

5.2 **Certification and accreditation** (MTSP Objective 10.3)

Questions about Certification were included in the questionnaires for seven respondent categories: HAP Member agencies, current and former Board members, HAP Secretariat staff, humanitarian agencies (non HAP Members), members of the Quality and Accountability Initiatives group, other organizations working in the field of accountability and donors.

Why so much emphasis?

The Secretariat response to the draft evaluation report questions the emphasis given to the issue of Certification. The Secretariat points out that only 7% of HAP’s human resources are devoted to Certification and mid-term audits. The reason for discussing Certification at such length is that it is the most controversial issue to have arisen during the evaluation and the responses and arguments reflecting the various viewpoints deserve full exposure.

5.2.1 MTSP Target

“The certification of humanitarian NGOs will be the empirical bridge between stated intention and implemented quality management systems that assure the application of HAP standards for accountability towards intended beneficiaries” (MTSP). The key components of this section of the MTSP included:

- Selecting a few member agencies to be assisted in achieving certification through “free, highly subsidised or at-cost consultancy support”);

- Monitoring certified agencies;
- ISO or SAI recognition of HAP Certification;
- Identifying “certifying channels” to whom the process could be “outsourced” (i.e. accreditation) and monitoring the selected agencies’ work
- Eventually handing over HAP certification to the accredited bodies.

The MTSP set the target for Certification at 36 agencies for end-2009, with a further 45 “in process” and “all current (2005) members certified.

As of mid-2009, five full Member agencies had achieved Certification. The three Certified Members which responded to the evaluation questionnaire are shown in **bold** type:

- **Danish Refugee Council**
- Dan Church Aid
- **Mercy Malaysia**
- **OFADEC**
- Tearfund (response received from Tearfund’s Board representative but not from Tearfund as member)

As of mid-2009 a further 15 full Members had enrolled for a Baseline Analysis, the first step in the Certification process. The six enrolled Members which responded to the evaluation questionnaire are shown in **bold** type.

- ACT
- ACTED
- **CAFOD**
- **Care International**
- **Christian Aid**
- Coast
- **Church World Service Pakistan – Afghanistan**
- **Concern**
- Lutheran World Federation
- **Muslim Aid**
- **Save the Children Fund UK**
- Sungi Development Foundation
- Women’s Refugee Commission
- Focus Humanitarian Assistance
- Merlin

The 11 non-Certified and non-enrolled full Members (questionnaire respondents in **bold** type) are:

- ACFID
- **CFSI**
- **CODEC**
- Coordination of Afghan Relief
- **Medair**
- Medical Aid for Palestine
- Naba’a
- Norwegian Refugee Council
- **Oxfam GB**
- SSEWA Pakistan
- **World Vision International**

No responses were received from the seven Associate Members (despite reminders). (People in Aid responded as a Quality & Accountability Initiative.)

The 2008 Secretariat Annual Report summarises progress as follows:

- Two agencies were certified against the Standard, bringing the total to five and 14 member agencies enrolled in the scheme. Certification against ISO or SAI was not pursued in 2008 but ISO Standards were observed as guidelines.
- There were delays in some components of the Certification process, with three Mid-Term Audits, research on an accreditation standard and Auditor refresher training postponed to 2009.

- HAP's growing understanding of the process underscored time as a critical factor in:
 - Gaining top management commitment;
 - Agencies' decisions over including development as well as relief;
 - A consultative approach to Accountability Frameworks;
 - Availability of Accountability focal persons;
 - Planning Baseline Analyses at programme sites.

The annual report observes: "...the major elements of HAP's certification scheme were only in place for the first time in 2008. There is no doubt that HAP underestimated the time required to establish the norms, the infrastructure and the demand but, as 2008 ended, there were strong indications that a growing number of agencies, donors and networks were acknowledging that the introduction of programme quality assurance through independent standards compliance verification could not longer be put off within the humanitarian sector."

5.2.2 Responses from HAP Members

The questionnaire to Members included separate sets of questions for Certified and enrolled Members and for non-Certified Members.

a. Responses from Certified and enrolled Members¹⁰

Actual or expected benefits of Certification and impact on accountability policies and practices; views on costs

- "Improved accountability and documentation"
- Significant improvement in programming quality. "Membership and in particular our decision to seek Certification...have contributed to this in several ways:
 - Has set a standard
 - Has provided tools to rationalize our quality improvement work
 - Has had a disciplining effect
 - Has earned us additional respect with at least two government donors
 - Has given us access to information about other organizations' work with accountability."
- "We are hoping to integrate accountability to beneficiaries in all the ways we work, so that it is built in and not an add-on."
- "The HAP Certification process has helped CAFOD to improve our systems and thinking about ways of working more accountably. HAP staff have supported CAFOD in this process through baseline surveys, discussion and feedback. [However] It is difficult to relate the way the CAFOD works – in partnership – to the HAP Standard and approach. It is designed for a predominantly operational approach."
- "Certification can help in knowing who is who in the jungle of humanitarian actors...Our expectation is to better serve beneficiaries with respect and transparency...Systematic work [has not been done on impact] but as a manager I receive less complaints and start seeing people complain more when they feel their right[s] not ...respected"
- "The HAP Standard and Certification scheme will be of value in improving the quality of programming and accountability...it is perhaps the start of a process in improving quality management and accountability and in time the bar of the Standard will get higher and more in-depth...An independent certification of compliance that is not just on paper, i.e. verification of what is actually happening on the ground is essential."
- Christian Aid expects Certification to have an immediate impact on policies but impact on practices will "take a while to trickle down...at the moment it feels like a bureaucratic process". The cost is fairly significant, "particularly during a time when all budgets are being tightened or cut. The other significant cost is the amount of staff time it has taken...agencies considering certification should be well briefed to know what to expect...The cost is fairly significant for the audit (and then to be reviewed again in 18 months and again in 18 months after that)...I think this has been a worthwhile investment but it has been significant and agencies considering certification should be well-brief to know what to expect."
- "Certification has created more awareness of our 'home grown' organization in the international arena; a solid reputation of being an agency that does its work as a true humanitarian NGO – i.e. is corruption-free."

¹⁰ Because of the small number, responses from Certified Members are quoted in full.

- Experienced staff from certified members should offer mentoring services in the certification process to the less experienced staff of new and potential members.
- CAFOD expects that “Certification will help us to keep up the momentum...” However “...establishing complaints mechanisms, greater communications/information with a large number of partners and offices in many countries will be costly, over time”.

b. Responses from non-Certified Members

Views on Certification; reasons for not seeking Certification and suggestions for making Certification more attractive:

(i) Non-Certified but enrolled Members:

- “We are not ready yet...the HAP Secretariat should offer more practical support”
- Certification “does not capture work across humanitarian and humanitarian [areas]. Improvements outlined in the document mapping exercise...take longer time for big agencies to make.”
- One agency (identity withheld) had undertaken document mapping with the intention of enrolling for a Baseline Analysis leading to Certification. The agency is part of an international federation which is undergoing changes in its governance structure. The agency raised questions with HAP as to how its specific needs and circumstances could be addressed but “we have not found them considered”.

(Two enrolled Members did not answer any questions about Certification.)

(ii) Non-Certified and non-enrolled Members:

- The value and effectiveness of Certification “depends on the organization...there are many standard-setting bodies...It would be wrong to think that all of them should be taken on in all organizations. Much depends on the stage of organizational development, the existing standards that an organization already adheres to...”
- The HAP Standard and Certification scheme “offers fantastic value for agencies that have invested in becoming certified, especially because donor governments are now recognizing this more and more”. However “it is not relevant for [Member’s name withheld] because we are not an operational agency”.
- “[this agency] is also ISO certified and signatory to the Red Cross Code, Sphere principles, a People min Aid member and has about 30 audits a year and all the reporting that goes with being institutionally funded...This...mean[s] we will not be pursuing a Certificate at this time.”
- Oxfam GB is working on many fronts to move from “championing accountability” to “managing accountability”. The HAP Certification process would not make enough of a difference to strengthening the agency’s efforts to become more accountable. It is not “discounted totally” as a possibility. Undertaking a Baseline Analysis would permit an interesting triangulation with the SCHR Peer Review Process.
- World Vision International is a federation with 98 members and some 1,600 Area Development Programmes covering a total population of about three million people. WVI would be willing to undertake a Baseline Analysis but not for Certification, which should be a voluntary process and not imposed on Members. WVI is a federation and this poses particular issues. WVI’s experience of attempting a Baseline Analysis with HAP in Sri Lanka and with the Food Aid programme was that HAP’s approach was “too strict”. HAP’s current work on developing an approach that is appropriate for federations and alliances is appreciated.

(One non-Certified and non-enrolled Member did not answer questions on Certification.)

5.2.3 Responses from current and former Board members

*Is achieving 100% or widespread Certification among all types of Members critical to HAP’s mission?*¹¹

a. Current Board members (seven responses from 12 current members)

¹¹ The Secretariat correctly points out that “100%” Certification was never an objective, although the MTSP called for “all current” Members (as of 2005) to be Certified

(i) Board members representing Certified or enrolled agencies:

- “Full members should be those who are Certified. Until that happens you should be an associate member. It might not be possible to change backwards among the founders, but we should find a model for changing things in that direction”.
- “Certification is the crux of the matter. The fact that anarchistic NGOs invite and ‘external’ verification of compliance with the HAP Standard shows the maturity, transparency and commitment to basic values of improving accountability to beneficiaries and improved quality...The idea of possibly failing to achieve Certification is what drives organizations to take this system more seriously...the peer pressure...gives staff thirsting to focus on field work with beneficiaries the legitimate platform to do so.”
- “It is important to get many organisations HAP Certified but not critical. I don’t think it will ever be achieved...”
- “Yes it is critical but I will not plead that HAP should go for 100% certification of all Members; then it will be an imposition. It should be up to the Members and their motivation. The demand side has to be strengthened rather than the supply side.”
- A Board member representing a partner which is enthusiastic about the purpose of Certification (and which has already undertaken the Baseline, HQ and field audits) nevertheless has reservations about the model:
 - It is highly technical. The Baseline process is complex and difficult to manage;
 - HAP staff need to continue to improve their interaction with field staff and – especially – with the volunteers and staff of Member agencies’ autonomous partners;
 - The respondent questions whether the HAP model of compliance verification is truly sustainable and capable of being rolled out to a significantly larger and more representative share of the sector.

(ii) Current Board members representing non-Certified agencies:

- “Certification as currently narrowly defined by HAP is not critical to HAP’s mission and might in fact be considered counter-productive...the essential essence of HAP’s work seems to have been overshadowed by a seeming preoccupation with an approach to certification that simply doesn’t make sense to many NGOs at this time...specific issues:
 - To be meaningful in large decentralized organizations certification would have to be conducted in each sub-entity, which would be cumbersome and resource-intensive;
 - The real value of HAP certification has not yet been demonstrated or widely recognized across the sector;
 - Focusing only on humanitarian work within multi-mandated agencies is complicated;
 - Could certification be a “slippery slope” towards unwanted control of the independence of NGOs?

b. Independent Board members:

One response: “I know that some NGOs (members and non-members) wish HAP would provide more in the way of tools, training and support in accountability, rather than setting standards and systems for qualifying for certification...this is a general need and desire that could/should be addressed.”

c. Former Board members (five responses from ten former members):

- “Certification...is a pre-requisite if we want to be credible. Everyone recognizes that it is considerably more demanding and complex for larger humanitarian actors. The modalities and timetable have to remain flexible. I see no problem with big organizations certifying only part of their network first...But the principle of Certification is sacrosanct...I prefer a smaller HAP with a reduced membership but one unambiguously committed to Certification.”
- Certification “makes HAP new” and is certainly an indicator of accountability.
- “The journey is as important as the destination and should perhaps be recognized as such.”
- The priority given to Certification is misplaced. It is a valid concept in itself but should not be imposed.
- The HAP Certification process is “not facilitative”. There needs to be practical recognition that Certification is one of many ways of demonstrating compliance

The most substantive response from a former Board member was in the form of a copy of a note to the Board dated September 2007 written by Jane Cocking (Oxfam GB) and Antonio Donnini. The

purpose of this note was “to summarise the current position for the benefit of current members and those considering membership”. The note reviews HAP’s Accountability Principles, the role of the HAP Standard, the roles and definitions of accreditation and certification and expectations of HAP Members. With respect to Certification, the note stated:

“This is obviously an important element of HAP’s work and as such members are asked to consider carefully their position in relation to the process and to inform other members of whether they are intending to pursue certification. The Board encourages members to work towards certification but it is not a requirement of membership. In the case of larger or exceptionally widespread members of HAP it may be impractical or philosophically undesirable for the whole organisation to pursue certification at the same time. In which case the member may propose to undertake a certification process for a specific geographically or sectorally defined part of its work.”

The Board reviewed this paper at its November 2007 meeting and “proposed that the wording on certification will be used on the web site to clarify options when explaining HAP membership and certification”. As of June 2009, the HAP web site does not appear to display the wording agreed by the Board.

A discussion note by CARE International¹² sets out the advantages and disadvantages of certification as follows:

a) advantages (quoting from The HAP Way Forward, 2004):

- Creates incentives for improving quality
- Offers assurance
- Stimulates a culture of awareness about beneficiaries
- Confirms compliance with agreed standards
- Ensures learning and continuous improvement
- Enhances agency’s creditability
- Enables donors to make informed choices
- Begins to eliminate bad practice

b) disadvantages and concerns:

- Certification examines processes rather than outcomes
- It is time consuming both in terms of staff learning as well as the various steps involved in the process
- There is a financial cost
- It “does not necessarily translate into more income for the organization”
- The costs will be unaffordable for smaller NGOs “who will be squeezed out of humanitarian work”
- It is a Northern-centric, bureaucratic and will inhibit innovation, creativity and risk-taking.
- It is unclear what is being certified: processes, outputs or impacts?
- Uncertainty about the organizational level being certified.

5.2.4 Secretariat staff

Six of the 14 current (and one former) staff who responded to the questionnaire answered the questions about Certification. This section of the Secretariat questionnaire contained six questions. All the current staff with responsibilities directly or indirectly related to Certification responded.

All responses were supportive of Certification. Some responses are detailed and lengthy (reflecting the evaluator’s need to understand the complexities and nuances) and these have been shortened. Where different respondents have given similar answers to a question, these have been condensed into a “generic” response.

1. *Why is certification strategically important?*

- HAP’s objective is to assure programme quality and HAP Certification does this;

¹² CARE International. Accreditation and Certification: Do NGOs responding to emergencies need to certify that their programmes meet specific quality standards? Draft 3, March 2007.

- A credible quality assurance process drives continuing improvement;
- Independent verification is key but effective peer review may need further exploration;
- Certification is a tool to bring about change. The more agencies certified, the greater the peer pressure and the stronger the “mark” in the sector;
- “Certification is the core of HAP’s business...without it we have not made any significant progress from what existed in pre-HAP days i.e. a shelf full of promises...but no evidence of change”;
- Certification “is the single most important activity that differentiates HAP from other quality and accountability initiatives”.

2. In what ways is HAP’s Certification process more appropriate than others?

The competitors :

- SGS NGO Benchmark has no donor recognition and no beneficiary input in its design
- ISO 9000 is very bureaucratic, document-based and expensive
- AccountAbility and Social Accountability are designed to demonstrate corporate social responsibility
- People in Aid – is complementary
- Various national schemes: none offer “international recognition”
- At a meeting with staff, a senior HAP staff member described the SCHR Peer Review in extremely negative terms.

The advantages of the HAP scheme:

- The HAP scheme is “developed by the sector for the sector”¹³
- Benchmark 1 is inclusive of all relevant standards and codes
- Allows for exoneration in “fluid contexts”
- Demands proof of continuing improvement (i.e. not a one-off achievement of a minimum standard)

3. How can one scheme be appropriate for a wide variety of agencies (multi-mandate, multi-level, operational/working with partners)?

- The standard-setting process consciously designed the HAP Standard for universal application (barring the smallest CBOs); therefore it is appropriate for non-operational agencies and for multi-mandated agencies (though improvements are needed).
- The process has worked with development, relief, advocacy and mine-clearance agencies.

4. Could options be introduced (e.g. certification of one unit of an international NGO)?

- This option exists provided the unit to be certified is working to an Accountability Framework that is included in the scope of the audit. A field office could be HAP Certified provided the HQ is also audited (which would be more expensive).
- The option is there but there is an issue about the integrity of the HAP “mark” in this case.

5. Do the results, outcomes and expected impact justify the cost?

- The improvements in (Member X) are clearly visible since their audit.
- Should the value of beneficiary accountability be limited by cost considerations?

6. Other suggestions for improvement

- Streamline the process – make it less “convoluted”
- Consider how working with other quality initiatives will impact the work

¹³ This is a frequent response but the inherent merit of being “developed by the sector” is not explained. The same presumably applies to the SCHR Peer Review and other similar methods of quality control.

The case for Certification against the HAP Standard

The most comprehensive exposition of the value and logical coherence of the HAP Standard and Certification system was expressed in the Chief Auditor's response to the questionnaire and is summarised as follows:

The HAP Standard:

- Requires an accountability framework to be made public
- States the minimum standards of good practice an agency must attain to achieve an internationally recognized level of accountability and quality management
- Provides an excellent tool for communicating internally and externally

Certification: Auditors describe their findings under four categories:

- Major non-compliance leading to non-certification;
- Minor non-compliance: certification can be awarded if there is convincing evidence of progress towards compliance;
- Recommendations to be implemented within 18 months;
- Observations on good or bad practice outside the remit of the audit

Certification award:

- Awarded for 3 years provided corrective actions are taken: reviewed after 18 months
- Recertification after 3 years following a full audit.

Importantly, this explanation includes the example of an agency which has developed a complaints handling system but this has not yet been disseminated among the agency's 800 partners. This would count as a "minor non-compliance", provided there is a plan to achieve the dissemination within a specified time frame.

Why is the HAP certification scheme appropriate?

- "Developed by the sector for the sector" and addresses the needs of beneficiaries, partners and staff;
- Benchmark 1 – the Accountability Framework – can accommodate other relevant standards and codes;
- Adaptable to contexts in which exoneration might be justified;
- Can work with multi-mandated agencies including those with partners (has been tried with relief, development, advocacy and mine clearance: it "works across the board");
- Benchmark 6 demands continuous improvement.

5.2.5 Humanitarian agencies (non HAP members)

a. UN and other agencies:

Questionnaires were sent to **Caritas Australia**, CERF, **HelpAge International**, **ICCO**, OCHA, UNHCR, UNICEF, UNIFEM¹⁴, UNRWA, WFP and WHO. Responses were received from the three agencies in **bold** type.

- The HAP Certification process poses greater challenges for some NGOs...For agencies like Caritas Australia that largely implement through local partners and are committed to responding to disasters led by existing local structures, it is not clear how Caritas Australia becoming certified will actually improve practice in the field that is the responsibility of local agencies...What be very beneficial for promoting and strengthening accountability to beneficiaries would perhaps be an alternative process to certification for those agencies that work predominantly through local partners or even local NGOs that implement in partnership with local communities..." Other points addressed by Caritas Australia are:
- The process should enable an agency to consolidate its current practices, identify gaps based not only on the HAP Principles but others such as Catholic Social Teaching;
- Such a holistic process would be a worthwhile investment: committing to the HAP audit is challenging, given other demands from other stakeholders;
- Lack of clarity as to how certification would really improve practice in the field.
- UNIFEM is aware of HAP and supports its effort to establish standards in humanitarian accountability. As UNIFEM is not a relief agency, the HAP Standard would need to apply more widely across the social development spectrum.
- HelpAge International reports that "HAP's Baseline Analysis has been useful in showing where the agency stands in terms of accountability and has provided recommendations for

¹⁴ An individual response from UNIFEM's Regional Programme Director for the East and Horn of Africa

the next steps. HelpAge is currently developing an accountability framework incorporating the HAP Standard. Membership continues to be a consideration.”

ICCO/Dutch Church in Action, while fully supportive of the HAP principles and standards, intends to become an Associate Member of HAP. However, “As an ISO-certified organization, the strategy is to incorporate HAP elements...into the existing quality system and not to design a separate system for accountability and to do separate HAP audits. Of course a HAP baseline would be useful to provide input to this process.”

ICCO believes that HAP should address the development as well as the humanitarian sector and that “it should disconnect its auditing services from its membership structure in legal terms.”

Contact was also made with Action Aid International, which responded “Action Aid decided not to join HAP as we did not think this would enhance our downward accountability. However since that response (18th June 2009) it appears the Action Aid wishes to engage in dialogue with HAP.

Médecins sans Frontières did not respond to a request for an interview.

b. Members of the Oxfam International Humanitarian Consortium (OIHC)¹⁵

(Excluding Oxfam GB which responded as a HAP Member) Responses were received from all OIHC members: Oxfam America, Oxfam Australia, Oxfam Intermón, Oxfam Novib and from Oxfam International’s Humanitarian Director.

What is your opinion of the HAP Standard and Certification scheme? If your agency were to become a Member of HAP would you also seek Certification under the HAP Standard?

- Oxfam America is a signatory to the Red Cross Code of Conduct. The Certification scheme is intended to encourage Members to adhere to accountability principles “but it is an imposed step on Members who voluntarily join HAP”
- Oxfam Australia (following a visit by the HAP team in 2008) “has decided to devote resources to integrating the HAP Standard into our Monitoring, Evaluation and Learning System rather than to devote energy to membership and accreditation.”
- Intermón Oxfam regards the HAP Benchmarks as a good guide. However seeking certification “may eventually lead to forgetting compliance with other standards...it (certification) does not necessarily mean being a good quality humanitarian organization delivering quality humanitarian action.”
- Oxfam Novib prioritises other certification schemes including ISO, INK (the Netherlands Institute for Quality Control) and the CBF (Central Fundraising Bureau). Oxfam Novib is developing accountability policies and structures which address the various layers of being primarily a partner-oriented agency: Oxfam Novib’s accountability to partner; partner’s accountability to beneficiaries and Oxfam Novib’s accountability (directly) to beneficiaries. The HAP scheme does not appear to be appropriate at present.
- Oxfam International’s position is to be engaged with HAP’s principles and the Standard and to promote these as a key reference for OI humanitarian work. They have been incorporated into OI’s Humanitarian Dossier. Rather than certification, OI believes that enforcement of the standards has to be made through strong institutional commitment, supported by peer reviews, leaving the certification process “as a voluntary act for those agencies which consider this will help them achieve HAP fulfilment...Certification is becoming very heavy and process oriented”.

5.2.6 Responses from members of the Quality and Accountability Initiatives group

Questionnaires were sent to **ALNAP**, Coordination Sud, ECB, Groupe URD, Listening Project, **People in Aid** and the **Sphere Project** (respondents in **bold** type).

¹⁵ The Secretariat response to the draft evaluation report questions why such “prominence” is given to the views of the Oxfam family. There are three reasons. First, the Oxfams are important and influential humanitarian actors; second, they all indicated that they are actively addressing downward accountability issues; and third, they all respect HAP and indicated a serious willingness to engage in dialogue with HAP.

Views on the importance of certification and compliance verification as part of humanitarian accountability and quality management

- ALNAP “has an open mind” but points out that “there is not a great deal of evidence to demonstrate the differences/similarities or advantages/disadvantages between compliance and voluntary adherence to codes, standards and norms”.
- Another respondent sees certification and compliance verification as “essential”.
- Sphere recognises the value of certification but would not insist on it for the agencies with which it works.

5.2.7 Responses from other organizations concerned with accountability and quality management

Questionnaires were sent to: the Global Reporting Initiative, Social Accountability, ACFID, ICVA, **INTOSAI** (Working Group on Accountability and Audit of Disaster Related Aid)¹⁶, **InterAction**, **Philippines Council for NGO Certification** and Transparency International (respondents in **bold** type).

Views on the value and appropriateness of the HAP Standard and Certification scheme

- A former InterAction staffer states: “HAP’s certification scheme is headed in the right direction but...it is not necessary to develop this capacity on its own. There were and still are better-established resources that it could...tap into and help defray costs...A major lesson of the child sponsorship certification scheme is that the cost of accreditation is a deterrent to sustaining NGO participation.”
- INTOSAI states: “The Standard without a certification scheme would not add value...INTOSAI would never have liaised with HAP without the certification scheme.”
- The PCNC states: “The HAP Standard and Certification scheme is a comprehensive and reliable instrument to evaluate and certify humanitarian organizations.”
- In a telephone interview, ICVA raised two concerns: first, that HAP’s emphasis on certification means that what ICVA regards as HAP’s more effective tools for promoting accountability, especially work at field level, are being neglected; and second, that the HAP scheme fails to take account of the serious problems of NGO individualism, competitiveness and fragmentation of effort at field level: accountability and quality management tools have to monitor and promote partnership between actors as well as individual agencies’ downward accountability.

5.2.8 Responses from donors

Questionnaires were sent to: AusAid, Gates Foundation, CIDA, Danida, **DEC**, DFID, ECHO, Ford Foundation, Irish Aid, Netherlands MFA (declined to respond), Norway MFA, **Oak Foundation**, Oxfam GB, **SIDA**, Swiss Development Cooperation, USAID (respondents in **bold** type)..

Three of the responding donor agencies have and are continuing to develop their own humanitarian accountability policies and criteria, including policies on beneficiary accountability. SIDA regards the HAP Standard and Certification scheme as having “high value, high relevance” but “medium-to-high appropriateness”. This qualification is based on two concerns:

- First, weakness in “actively promoting existing standards for good practice within the humanitarian sectors”. HAP should promote:
 - Recommended standards in needs assessments (e.g. per cluster area); in evaluations (drawing on ALNAP, DAC); in delivery standards (Sphere); in narrative and financial reporting (INTOSAI);
- Second, HAP should be more active in promoting:
 - Closer linkages with other Quality and Accountability Initiatives; UN Q & A processes;
 - Much stronger advocacy and communication for better humanitarian accountability preferably together with the Q & A Initiative members.

In SIDA’s view, “the existing standards do not have to be part of the (HAP) Certification scheme. HAP can and should...recommend good practices in different areas but it is up to each programme to adopt what it wishes to be held accountable to.” SIDA endorses the OECD view that the emerging issue for donors is “how HAP-I, Sphere and other initiatives can align and collaborate to present a holistic vision of accountability and quality for the humanitarian sector.”

¹⁶ INTOSAI: the International Organization of Supreme Auditing Institutions, founded 1953; currently 189 full members.

The UK's DFID "has included HAP's humanitarian accountability principles in its humanitarian funding guidelines. We encourage but do not require our partners to be certified. DFID continues to encourage UN agencies to join NGOs in adopting the HAP Standard and the Certification Scheme [which] allows us to recognise those agencies whose accountability frameworks and quality management systems can be trusted to deliver assistance in accordance with the standard."

The UK's DEC has developed an Accountability Framework based on six priorities, the fifth of which is "We are accountable to beneficiaries". This is defined as "Taking account of, giving account to and being held to account by disaster survivors." DEC members which are HAP Certified automatically score a "green light" with respect to this accountability priority.¹⁷

The Oak Foundation (which is particularly concerned "with the BSO focus within HAP") considers the HAP Standard and Certification scheme "to be a valuable contribution although impact is still to be demonstrated...by beneficiaries/survivors in locations where signatories to HAP Standards and Certification operate."

5.2.9 Responses from external experts

Three of the six external experts who responded to the questionnaire commented on the Certification Scheme.

John Borton believes that "ultimately certification is the only way to really demonstrate that the required benchmarks are being met. Without certification all agencies will say they are committed to improving accountability but none would be able to have that independently verified. So certification has to be the goal. Maybe what is needed...is a clearer differentiation between 'being a HAP Member' and 'being a HAP Member certified to the HAP Standard'. This would be more transparent and would increase the incentive to achieve certification. Some [agencies] may choose to leave HAP but at least this would make it clearer to [their] supporters...that the agency may espouse being accountable but is not prepared to make the necessary investments to test their systems..."

Nicholas Morris, who is a member of the CARB observes that "The standard and certification seem a good way of combining the necessary rigour with an inclusive approach that is also flexible with regard to other standards. The bar needed to be set high."

An external expert who prefers to remain anonymous says "I hear agencies say that the added value of HAP certification is not proven. Those who have gone through it speak of the process as very useful and important...However for those who do not go through it, they see no costs – either from peers, donors, or...the supposed recipients/beneficiaries...As one said 'We do not see the certificate on the wall as valuable enough to justify the expense in time and money it would take to go through the certification process. The essence of such comments is: HAP certification is not linked to improved accountability in peoples' minds'".

5.2.10 Conclusions and issues of concern

- The development and rolling out of the Certification scheme is recognised by many respondents as a significant achievement and an important contribution to the development of humanitarian accountability as an active and measurable process;
- However, the Certification scheme is also the issue on which respondents are most sharply divided. In simple numerical terms, the majority of respondents support the scheme and some believe it to be an essential means of demonstrating compliance with accountability and quality standards.

There are three particular issues of concern: the absence of evidence about the impact of certification; implications for the wider humanitarian community; and the linkage between HAP membership and Certification.

¹⁷ According to the Humanitarian Accountability Report 2008 (p60), "Certification with the HAP Standard...is not mentioned in the current version [of the DEC Accountability Framework] dated July 2008. However, this the DEC's Humanitarian Adviser confirmed to the Evaluator in June 2009 that Certification with the HAP Standard is taken as equivalent to meeting the accountability to beneficiaries component of the Framework.

1) Evidence about the impact of Certification among beneficiaries

HAP's 2008 Humanitarian Accountability Report contains a chapter titled "Voices of some disaster survivors", based on interviews with 685 individuals. The quotations are from survivors and beneficiaries in Bangladesh, Lebanon, Myanmar and Pakistan. The quotations refer to survivors' opinions about information dissemination; complaint systems and community participation. The quotations do not explicitly refer to the conduct of Certified HAP Member agencies, so no inferences can be drawn as to whether Certified agencies' accountability policies and practices are more effective than others. Nevertheless, the process of interviewing survivors and beneficiaries is clearly an important first step towards generating credible evidence about the impact and value of downward accountability.

According to HAP the interviews "reveal a mixture of perspectives...; they highlight that in 2008 some communities had positive experiences with humanitarian organizations that are implementing different aspects of the HAP Standard."

This indicates that agencies that have adopted and absorbed the HAP Standard certainly do translate what they have learned into better practices which are appreciated by beneficiaries. It does not (yet) tell us anything about the specific value of compliance verification through HAP Certification.

Testimony about Certification at the HAP General Assembly in May 2009 focused on the impact of the process on agency policies, systems and practices. So far no significant evidence has emerged as to its impact on the beneficiaries of certified agencies. Nor has any attempt been made to carry out an objective comparison between the impact of the HAP certification scheme and others such as the SCHR Peer Review process. It is simply not sufficient for a senior HAP staff member to dismiss the latter out of hand. Nor is it appropriate (or smart) to dismiss the scepticism that some BINGOs have about the appropriateness of HAP's Certification scheme as "fear of having their programmes exposed".

As a result, the case for HAP's Certification scheme depends on a mixture of logic (compliance verification must self-evidently be a good thing), and trust in the experience of peers (five reputable agencies are Certified and say that it has improved their policies and practices).

In his "Overview of humanitarian accountability" in the 2008 Humanitarian Accountability Report, John Borton observes: "...it would also be of considerable interest and benefit to HAP members and humanitarian agencies generally for research to be undertaken that **compares the performance of those agencies that have achieved HAP certification and those that have so far not become members of HAP and/or commenced the certification process...**None of the evaluations reviewed were of programmes undertaken by HAP certified members. Several evaluations focused on or covered programmes undertaken by HAP members, some of which have yet to begin the certification process. Such evaluations contained examples of 'bad' as well as 'good' practice. It is not possible to make any inferences on the basis of the material reviewed. **However, such questions are important and would justify efforts to improve the understanding of performance differences that could be attributable to systems required in order to attain HAP certification.**"

Until HAP can conduct or commission research on certification which moves beyond "agency improvements" to "benefits to beneficiaries", the platform for significantly expanding certification's "share of the market" across a wide range of humanitarian agencies (small, medium, large) will remain fragile.

2) HAP Certification and the wider humanitarian community

The report on a recent meeting between two HAP Board members and representatives of the agencies that form the Inter-Agency Working Group¹⁸ provides a useful review of the current state of the debate about "the agencies' commitment to strengthening accountability to beneficiaries and the difficulty that some, particularly larger, NGOs have had with HAP's certification process". The report reinforces to the point made in 1) above regarding evidence: "It is not yet evident across the humanitarian field whether the value of HAP certification would make [such a large investment] worthwhile". The

¹⁸ "Notes on HAP certification discussion with Inter-Agency Working Group", Mary Anderson and Jonathan Mitchell, 29 April 2009.

report points out that “the current certification system seems to work well for smaller, unitary agencies” but raises a number of policy and organization issues of concern to large, complex agencies working at various levels, with wider mandates and in cooperation with autonomous local partners. The report ends with three suggestions “about how to strengthen accountability processes going forward”.

The meeting was initiated by HAP’s Treasurer and an Independent Board member and “in the hope that an open, unstructured conversation about HAP’s approaches to accountability would help us (HAP) move forward with some positive ideas for engaging the larger humanitarian agencies...and the discussion was productive both in tone and substance.”

The (initial) response from HAP was somewhat negative. Apart from a formal reference to “continuing the dialogue”, the response did not engage substantively with the points raised in the report. The tone of the response is characterised by the observation that “some information cannot be repeated often enough, *especially when it goes against well-entrenched views*” (emphasis added).

The Secretariat response includes the following (undated) statement from Tearfund:

“Tearfund has been pursuing Beneficiary Accountability as a corporate priority for several years and certification was awarded for Tearfund’s emergency responses in June 2008. We have observed a whole range of tangible benefits resulting from this approach. In projects operating in insecure environments, the commitments to transparency, making information publicly available, participation and facilitating feedback and complaints has enhanced staff security and directly contributed to our community acceptance strategies. The same commitments have led to cases of fraud, whether by staff or community members, being exposed and addressed. Furthermore they have contributed to creating an environment where such activity is clearly understood as being unacceptable. Feedback mechanisms have immeasurably strengthened the outworking of our child protection policy and our commitments on the elimination of sexual exploitation and abuse, in supporting these commitments with functioning complaints handling procedures. The discipline of developing a set of Quality Standards as our humanitarian accountability framework has enabled us to communicate a coherent set of quality commitments to both our staff and the communities where we work. We look forward to further learning and improvement as we put these quality commitments into practice.”

This is impressive testimony, which should be respected and taken seriously by those who are sceptical about the value of the HAP Certification scheme. However, two points should be noted:

- First, the statement does not distinguish between the benefits derive from the policy and practice improvements that preceded certification, or from certification itself. Many non-certified agencies which are making changes in order to adhere to Sphere, the Red Cross Code of Conduct and other standards – including the HAP Standard – also testify as to the improvements they have observed in staff attitudes and behaviour.
- Second, this is testimony, not research-based evidence. about the impact of Certification;

3) *The controversy about Certification and Membership*

This controversy is unproductive and has led in some cases to considerable tensions in the relationship between the HAP Secretariat and some Members. The perceived suggestion that full membership should be dependent on achieving certification is also deterring some agencies from considering full membership.

Some HAP Secretariat staff have suggested that the big NGO members which regard HAP Certification as inappropriate to their mandates and structures, could not afford to take the risk of voluntarily leaving HAP if certification became compulsory for Full Members.¹⁹ However, the agencies concerned state that, much as they would regret leaving HAP, they would not see such a step as presenting significant “brand risk”. One such agency responds:

“We are a member of HAP because we believe in strengthening our accountability to affected communities and because we think that there is a value to NGOs working together towards this goal. We do not remain members because we are afraid of negative PR - that is a rather

¹⁹ This is the implication of John Borton’s comment – Executive Summary

scurrilous view and is certainly untrue. **It is important to say that agencies are not necessarily against certification, but many do not particularly find it useful in the current format since it is clearly configured to suit smaller operational agencies...**HAP's overriding emphasis on certification has significantly undermined HAP's usefulness in terms of putting accountability into practice. If HAP made certification compulsory without first consulting thoroughly with all members and without working with members to develop appropriate and feasible ways for all types of members to certify, then [this agency] would certainly leave HAP."

5.2.11 Accreditation

The MTSP outlines ideas about accreditation including outs-sourcing or franchising the HAP Certification scheme to external bodies. Some progress has been made in exploring possible external partners and building a "Chinese wall" within HAP by establishing the Certification and Accreditation Review Board (CARB) as a discrete entity with authority for approving certification. This removes, or at least reduces, the problem that "HAP will be the certifying body for its own members" referred to in the MTSP.

The CARB was agreed at the 2008 General Assembly and the election of Board members was completed in December of the same year. Training of CARB members in relation to certification was planned for 2008 but postponed to 2009 owing to the absence of the Regulatory Services Director.

Discussions were held with potential accreditation networks including ACT International, Naba'a and the Asian Disaster Reduction and Response Network (ADRRN). The HAP Pakistan Office was also included in these discussions prior to its closure in 2009.

Clearly, if compliance verification through Certification against the HAP Standard is to be pursued as a major strategy, responsibility for Certification decisions needs to be out-sourced through accreditation. HAP's efforts in this direction appear to be producing encouraging results.

6. Governance Services (MTSP objectives 10.12)

6.1 Governance

6.1.1 Background

The first internal strategic objective set out in the MTSP was "a review of governance structures...in line with the adjustment to the membership structure". The intention was to create the categories "Partners" (i.e. donors), "Associates" and "Certified Members" (see section 4.1 above). The 2007 Secretariat Annual Report does not indicate whether a "review of governance structures" was commissioned as planned: it simply notes that "The decision by the General Assembly to retain the existing membership categories meant that a key governance objective...was not achieved as planned."

Statutory obligations in relation to HAP's governance were met during 2007 and 2008 (and the first half of 2009), with General Assembly and Board meetings held as required and serviced by the Secretariat. Minutes of these meetings are complete and appear on the HAP web site.

6.1.2 Questionnaire responses

Several responses suggest that Members should play a more active role in promoting HAP's message through sharing responsibility for advocacy with the (overstretched) Secretariat, though none offer specific proposals.

Board member responses focus on several issues and reflect some divergence of views:

- Membership criteria: "Why become HAP members when you are not really interested in accountability? tighten membership bylaws"
- "The Board should act more as a professional board...the Board has to do with governing principles, strategic planning etc. and the Secretariat [is] responsible for the operation...with this division of labour the Board would be more effective and more engaged. If you add that only certified members in the future can be full members – we are almost there."

- Certified members should be held more accountable through a peer review process at General Assembly meetings. (Group meetings should be better prepared.)
- No structural problems but the Board “has not always engaged sufficiently and appropriately with the direction and management of HAP...this has improved somewhat during the last year...[however] the informal, non-confrontational style of the Board is potentially risky in terms of good governance. For example, the Board may have to deal with some difficult financial issues if HAP does not resolve its funding problems; it needs to ensure that appropriate performance [review] of the ED takes place.”
- “The Board is not very active in that we meet twice a year and review a series of (well-prepared) documents and ideas produced by the Secretariat...In this way we are to a large degree a rubber stamp”.
- A current Board member points out (in response to the draft report) that recommendations have been made to expand the role and scope of the Peer Support Group in order to strengthen ownership of HAP products and processes among the wider membership.
- One current Board member believes that the Board has been insufficiently engaged and has allowed HAP to become “Secretariat-driven”. He believes that HAP’s current set-up – meaning Membership, Board and Secretariat – is not fit for the purpose of carrying HAP forward into the next phase of its strategic development.
- A former Board member comments: “The Board was generally insufficiently engaged. Members left it to the Secretariat to lead the accountability process. Most of them failed to realize that they were the core of HAP, not the Secretariat alone...some large HAP members almost felt like external partners as opposed to core stakeholders..The Secretariat was considered by some members as exceeding its mandate...A more engaged Board could have prevented this.”

6.1.3 Conclusions and issues of concern

The key issues under governance are evident from the responses quoted above. It is essential that the still outstanding issues of membership categories and criteria in relation to certification are resolved through a well-prepared, consultative process which engages members and is fully discussed and owned by the Board and General Assembly and not vulnerable to accusations of being “driven through” by the Secretariat.

One of the “aspirations” in the MTSP is that “HAP is firmly established as an organization by the end of 2009”. This has been achieved though with qualifications. A major question is “what kind of organization is HAP?” The evaluator’s observations at the May 2009 General Assembly and Board meeting are in line with the responses quoted above. Some Members appeared to more like clients of the Secretariat rather than fully engaged in governing a membership-based organization. The Board meeting also gave a somewhat casual impression. Recognizing that Board members are scattered around the world, it would not be practicable to suggest that they all engage more actively in providing the strategic steer and direction.

The Board has three “Officers” – the Chair, Vice-Chair and Treasurer – but they not appear to have any function as a group.

A partial solution to what appears to be a “governance gap” at Board level would be to establish an Executive Committee of three or four Board members (the Chair, Treasurer, Vice-chair and one other). The ExCo’s role would be:

- To be the first line of communication between the Secretariat and the full Board;
- To receive regular reports from the ED on key strategic and management progress and challenges and offer advice;
- To meet briefly before and after full Board meetings in order ensure efficient preparation and follow-up;
- To conduct the annual performance appraisal of the ED.²⁰

²⁰ This is a standard function of a Board and was agreed at the 12th HAP Board meeting in November 2007. At the 13th Board meeting the Chair committed to conducting the review before the 14th meeting in October 2008. There is no mention of this in the “matters arising” section of the Minutes of the 14th meeting. The issue is highlighted here because it was raised as a matter of concern in a member’s response to the evaluation questionnaire.

6.2 Management

6.2.1 Background

Management of HAP's affairs lies to a very large extent with the Secretariat, under the authority of the Executive Director, whose responsibilities and authorities are set out in Article 17 of the HAP Statute:

- "The Executive Director:
 - 1) is accountable to the Board for the general and daily management of the association and the realization of the mandate of the Association;
 - 2) is authorized to undertake all activities in pursuit of the purpose of the association within the approved budget;
 - 3) represents HAP International vis-à-vis third parties."

At the 12th Board meeting in November 2007 the Secretariat's expenditure authority was established as CHF 50,000 (with two signatures).

The MTSP does not contain a separate section on Management. However the annual reports for 2007 and 2008 do include narrative reports on the Secretariat's role in "ensuring the effective, efficient and accountable management of the organization".

The main achievement in 2007 in relation to management was the reorganisation of the Secretariat into four "work clusters": Policy Services, Development Services, Regulatory Services, and Management & Governance.

6.2.2 Questionnaire responses

Responses from 3 Members to the question about HAP's organizational performance are generally positive, with the following observation being typical:

- "Administrative and financial transparency and efficiency are both excellent...the commitment of the HAP staff is extremely strong, which is a credit to the leadership of HAP (and of course to the staff)."

The Treasurer observes that "The Secretariat has overall quite solid management systems...The organizational structure is generally appropriate and the Secretariat has acted responsibly in adjusting activities and costs in response to funding downturns. It has accomplished a lot of its plans despite its funding and capacity constraints."

Other responses from Board members raise some concerns:

- In relation to internal management of the Secretariat, the Chair suggests that the ED should focus on team-building and delegation.
- One believes that there were "not enough checks and balances between the Executive Director and the Chair of the Board".
- Another thinks there has been "significant staff turnover, often with long vacancies, since HAP's establishment in 2003." However this is disputed by the Secretariat which points out that turnover is in line with Swiss levels and that the actual problem has been individual prolonged absence due to sickness.
- Two Board members draw attention to what they regard as the need for HAP's centre of gravity be more oriented to the South: perhaps by moving the Secretariat to a southern location (which would also reduce costs). One believes that the ED should spend more time visiting the field. The Secretariat maintains that the advantages of the Geneva location outweigh possible disadvantages.
- The Secretariat is predominantly European: this should change. A higher proportion of southern staff would greatly strengthen HAP's credibility, authority and outreach. The Secretariat responds that more than 50% of HAP staff were non-European at the time of the evaluation. This appears to be correct if the two members of the Pakistan field office are included: however this office had been closed at the time of the evaluation.
- HAP needs more staff with humanitarian field experience and understanding of local organizations. The current balance is too far towards technical (i.e. audit) expertise. The Secretariat points out that 11 out of 15 staff have field experience.

Secretariat responses are supportive of the 2007 reorganization but emphasise the need to refocus HAP's management style towards a less ad hoc and more coherent approach. One staffer observes: "We have extremely well motivated and experienced staff but their scope of work keeps getting bitten into by many other demands...the original model of entrepreneur and space to work on your own was great – but caused communication problems... the new model has flaws: we need to be managed more, and protected from over-work."

The ED sees the need for the Policy Services staff and the Directorate to provide the "normative and operational glue to hold the organization together while Regulatory and Development Services pull in rather different directions." He sees the "really big advance" in "getting the whole team to think more in terms of service delivery and less in terms of 'HAP's rights and members' obligations".

The ED acknowledges the impact of budget constraints on staffing. The ED believes the Geneva location to be appropriate to HAP's role and not unduly costly, supported by research by the HR and Administrative Officer.

6.2.3 Conclusions and issues of concern

HAP – which effectively means the Secretariat – punches well above its weight in terms of funding and staffing. It has been burdened with an unrealistically ambitious MTSP which has meant constant trimming and downward adjustment to meet an uncertain funding situation, long absences of key staff and slow responses from Members.

Despite these unfavourable conditions and the staff absences mentioned above, the Secretariat presents a surprisingly positive impression. Staff are clearly highly motivated and very loyal to the ideals and ideas that HAP stands for and to their articulation by the Executive Director.

Concern about the extent to which HAP is "Secretariat-driven" has already been expressed in relation to the possibly over-hasty push for Certification as a condition for full membership. Given that the Statute gives very wide powers to the ED and the Board's apparently somewhat relaxed attitude to its own responsibilities, it is quite appropriate that the Secretariat staff should do all they can to respect and follow the ED's leadership.

However, an informal discussion with staff raised several suggestions for improvement in the ways in which the Secretariat is managed:

- Delegating more responsibility for internal management and external relations to senior staff;
- Installing a formal and transparent performance review system;
- Making the management team concept actually operational;
- More productive and efficient preparation and conduct of work planning and budget meetings;
- Encouraging professional staff "to work to their strengths";
- More realistic and less (over-) ambitious planning;
- Encouraging a culture of team-building, openness and trust (which some staff feel to be absent).

All these suggestions appear to the Evaluator to be valid and worth following up in the context of developing the next strategic plan.

Although the criticism (by a Member) that there is a high level of staff turnover may not be strictly correct, nevertheless several factors contribute to an impression of fragmentation and lack of consistency in the Secretariat:

- Permitting staff in key positions to work from home bases far from Geneva;
- Several different post-holders over a short period of time;
- Lack of adequate backup arrangements to cover during extended absences due to illness.

6.3 **Funding and financial management**

6.3.1 Background

The MTSP forecast funding rising from CHF 2.35 million in 2007 to CHF 3.35 million in 2008 and 3.55 million in 2009. The expectation was that the donor grant proportion of these budgets would decline

from 86% in 2007 to 69% in 2009. There would be a corresponding increase in the proportion of expenditure covered by membership, training and consultancy fees and donor subsidies to smaller agencies.

The key components of HAP's funding strategy in the MTSP were:

- Contingency arrangements with donors
- Donor funding of core activities such as advocacy and research
- Development of new services paid for from surpluses from consultancy and training
- Contingency fund for complaints handling

HAP's total income in 2007 was in fact CHF 2.45 million, exceeding the MTSP forecast. Expenditure amounted to CHF 2.31 million. However 92% of this was accounted by funding from 22 donors (including a number of members) and the target for consultancy/training income was not realised, although the target for membership fees was exceeded.

Total income in 2008 was CHF 1.80 million (CHF 1.86 million below the MTSP target). Donations accounted for 77%. Membership fees accounted for 6% of total income; while income from service fees was CHF 193,000, representing 11% of total income

The Secretariat's report for 2008 focuses on the "prudent management [that] ensured that the shortfall in HAP's general funding was absorbed mainly through cuts in the planned management expenditure, while programme activity was, as far as possible, protected."

- A 33% growth in income
- The BSO merger
- Meeting all donor requirements

The situation in 2009 and forecast for 2010, as outlined by the Secretariat is that "cost recovery" income will rise from CHF 600,000 in 2009 to CHF 760,000 in 2010, against a total annual budget which the ED expects to stabilise around CHF 2 million. Taking salaries, consultants' fees, other core programme and administrative expenses together for 2008, HAP costs about CHF 2.05 million to run. Taking the cost recovery income projection of \pm CHF 500,000 this would mean that HAP needs to raise approximately CHF 1.5 million from donations each year to remain at its present level of output. This does not allow for the creation of a reserve fund equivalent to about five months expenditure which would be necessary in the event that HAP had to close down.²¹ This was the figure stated by the ED during a meeting. However, the Secretariat feedback challenges it as "wrong" – but without stating the correct figure.

6.3.2 Conclusions and issues of concern

On the face of it, HAP faces a serious financial situation. It has raised significantly less external funding than projected in the MTSP and planned staffing and activities have been postponed or cut back on a considerable scale.

On the other hand, HAP's services (consultancy and training and services associated with the Certification process) have generated significant income. Assuming that membership numbers and the demand for HAP's services continue to rise, dependence on donor funding - and therefore financial vulnerability – may become less challenging (although there will remain a significant level of activities that are dependent on donor support). This scenario, however, depends on HAP being able to attract a significant increase in membership and build up a much bigger client base.

Fund raising – like responsibility for attracting new members – appears to be distributed among Secretariat staff, although correspondence with key donors, such as DFID, is in the hands of the ED,

²¹ One of the "advantages" (from a management perspective) of being located in Geneva is that Swiss labour laws have rather minimal conditions in terms of employment security and termination compensation.

assisted by the Finance Manager. The latter's role, however, is limited to internal financial management and ensuring that donor reporting requirements are met.

Responsibility for managing donor relations strategically should be assigned to one senior person who is capable of communicating HAP's message in a clear, attractive and compelling way that makes obvious sense to funding decision-makers who are most probably not *au fait* with the ethical and intellectual complexities of humanitarian accountability. Ideally this should be the responsibility of someone at Deputy ED level and combined with responsibility for HAP's external relations.

It is understood that the idea of a consortium of committed donors willing to fund HAP's core non-revenue generating activities has been considered in the past. In the evaluator's personal experience, mobilising and creating a donor consortium can be extremely valuable but requires a sustained effort over a considerable period and cannot be achieved simply on the basis of correspondence and ad hoc person-to-person meetings.

The current strategic planning exercise provides a breathing space for HAP to step aside from the somewhat hand-to-mouth approach to finance that it operates at present, and to take a strategic, 360° look its financial needs and prospects over the next few years.

6.4 External relations (including MTSP objective 10.13 – Strategic Partners)

6.4.1 Targets and progress

The emphasis in the MTSP is on promoting the HAP principles through important networks including the Good Humanitarian Donorship (GHD) initiative; the Quality and Accountability Initiative group and other relevant networks. This strategic objective also includes steps to identify agencies or networks capable of being accredited to carry out the HAP Certification process.

As noted above (section 5.2), preliminary discussions about accreditation were held in 2007 with a number of agencies including ACFID, ICVA, InterAction, the DEC, WCC, ACBAR and others. Further discussions were held in 2008. The 2007 Secretariat annual report concluded that "HAP must first demonstrate demand for its own quality assurance certification scheme before it will be seen as a 'franchise-able' product."

In 2008 "the Secretariat strengthened its engagement with the leading quality and accountability initiatives." Achievements in this area in 2008 included the following:

- Agreement with SCF UK to establish an "Inspectorate" to be trialled within the HAP Standard Review process;
- Commitment with People in Aid to conduct trials in shared quality auditing;
- Agreement with the Sphere Project to align their respective standards revision processes;
- Joint Sphere/HAP deployment in Myanmar;
- Consultation on the development of the questionnaire for the SCHR peer review.

HAP also held discussion with donors, NGOs, networks and UNHCR.

Issues of concern

As noted in section 2 and as reflected by many respondents, HAP has succeeded, in a short time and with limited resources, in pushing the cause of accountability to beneficiaries very high up the agenda of humanitarian agencies at international, national and local level, donors, networks and other bodies. Clearly, this achievement depends to a large extent on the passion with which HAP's message has been communicated.

However, the same passion appears sometimes to be coupled with a tendency towards being "HAP-centred" and (perhaps unconsciously) regarding the subject of beneficiary accountability as "HAP property". One respondent (a HAP Member agency) observes that "the working relationships between HAP and other consortia are strained, due mainly to personalities and perhaps to some territorial issues...this leads people to be defensive rather than fostering joint advocacy, learning or – in the end – better accountability to beneficiaries."

HAP has achieved a great deal as “a new kid on the block” but the next period of development requires a more strategic approach to external relations. In the words of an Independent Board member, there is a need to “let go of history”. HAP should learn to avoid unnecessary and unproductive controversy. The objective is not to win arguments but to win positive outcomes for beneficiary accountability,.

7. HAP’s aspirations

As noted at the start of this report, the MTSP set 7 aspirations for 2009. On the basis of this evaluation, to what extent have they been achieved?

1. Significant changes of attitude and practice of accountability towards beneficiaries within the NGO sector:
and
2. The wider humanitarian community (UN, donors) recognise the necessity of accountability

The opening chapters of HAP’s annual reports for 2006 -2008 and responses to the evaluation questionnaires confirm that:

- Significant and widespread changes have occurred across the sector. Downward (sic) accountability is no longer a policy option for a growing number of humanitarian agencies. However there is a long way to go and the arrival of new humanitarian actors (military and corporate) has pushed the horizon even further;
- HAP has contributed significantly to this progress;

HAP’s strategic contributions and achievements are reviewed in section 2.2 of the report:

- HAP has promoted humanitarian accountability to a much higher position than it was at the beginning of the decade and has become “the loudest champion of beneficiary voices”.
- HAP has made accountability issues “more understandable”.

Key donors have acknowledged the value of the HAP Standard and Certification scheme and now recognise accountability to beneficiaries as an integral part of overall accountability.

A major challenge for the coming period will be to reach out to and engage with community organizations and agencies in the non English-speaking world. Engagement with UN agencies other than UNHCR remains limited at this stage.

3. HAP certification is a valid means of evidencing an NGO’s ability to implement accepted standards and a general acknowledgement of the value of certification

Section 5.2 reviews the progress HAP has made in developing the Certification scheme and facilitating its adoption. The support that HAP staff and consultants offer at the Baseline and mid-term audit stages of the processes is highly appreciated by Certified agencies and those enrolled in the process.

The testimony of the four Certified agencies that responded to the evaluation certainly endorses that “HAP Certification is valid evidence of an agency’s ability to implement standards”. However, although there is widespread “acknowledgement of the value of certification”, it is not “general”. The main reservations concern the (as yet) shortage of evidence as to the impact of Certification on the lives of beneficiaries and the appropriateness of the HAP scheme for multi-mandate, multi-level agencies.

4. HAP is firmly established as an organization by the end of 2009 and is recognised as “the hub for accountability best practice and advocacy”

Governance and management issues are reviewed in section 6.

HAP is established as an organization, with a growing membership, support from leading donors and a professionally-staffed Secretariat. However, the engagement of the membership is weak and the Board is not providing strong enough leadership. HAP’s financial position is vulnerable (although progress is being made in the cost-recovery area) and the Secretariat is not yet functioning as a fully coherent team.

5. Measurable improvement in the provision of humanitarian aid by HAP certified agencies, recorded by beneficiaries and external evaluators

See section 5.2.

There is plenty of testimony from HAP members to this effect although the testimony from beneficiaries, where available, does not distinguish between certified and non-certified agencies. There is a serious research gap which neither HAP nor other institutions are addressing effectively enough.

6. Institutional donors recognize the value of HAP certification and this is reflected in their relationships with HAP certified agencies

See section 5.2

Recognition by DFID, SIDA, DANIDA, and the British DEC network reflect the value of HAP Certification in their policies and criteria.

7. The added value of HAP services that build agencies' accountability capacities is recognised

See section 4.

Testimony and evidence about HAP's training and consultancy services and its field deployments in Pakistan, Bangladesh and Myanmar and elsewhere do show that agencies appreciate these aspects of HAP's services highly and in their own right. There is a considerable demand for HAP's fieldwork services which exceeds current capacity.

Annex A: Terms of reference for the evaluation
Annex B: List of respondents
Annex C: Documents/web sites consulted

Annex A: summary of Terms of Reference

The full Terms of Reference were approved by the Board of HAP and are available on the HAP web site. They provide background information about HAP's recent history and current situation. The purpose and scope of the evaluation as follows:

2. Purpose of the evaluation

1. To document HAP's progress against HAP International's mission and vision, its key policies (NEP, Accreditation and Funding), and the strategic targets set out in the 2007-2009 strategic plan.
2. To review and assess the relevance and appropriateness of the 2007-2009 strategic plan to HAP's mission, and the specific objectives of the BSO project.
3. To recommend changes of strategy and emphasis that should be incorporated into the HAP 2010-2012 strategic plan.

3. Scope

The consultant will raise and address all relevant issues that may emerge during the evaluation, including the key areas highlighted below.

Achievements to date

Consider progress achieved in HAP's mission and vision and the measures of success set out in the 2007-2009 strategic plan:

- What results have been achieved by HAP since its establishment in 2003?
- What progress has been achieved against the measures of success for 2009 set out in the 2007-2009 strategic plan?
- If implementation diverted significantly from relevant plans, what were these variations, why did they occur, and what have been the consequences?
- Review and summarise the available evidence of the impact on the quality and accountability of humanitarian action resulting from HAP's work, including the BSO project since the merger.
- How has the merger between HAP and BSO affected the objectives of both initiatives?
- How effective has HAP (and BSO) been in positioning and coordinating with the "Quality and Accountability Initiatives"?

Relevance

Assess the relevance of the 2007-2009 strategic plan and HAP's rolling workplans to the achievement of HAP's mission and vision:

- To what extent are the strategic goals and approaches in the 2007-2009 plan and key policies, relevant to the mission of HAP in 2010?
- To what extent are the BSO activities relevant to its goals and to the goals of HAP?
- To what extent have the approaches identified in key policies, the 2007-2009 strategic plan and HAP's rolling workplans addressed the conditions, needs and interests of key stakeholders and enabled HAP to pursue its mission?

Were the NEP, Accreditation and fundraising strategies relevant and realistic?

- Was the situational and "SWOT" analysis in the strategic plan sound? Is it still relevant?
- Were the drivers for change identified in the strategic plan relevant and realistic?
- Were the "approaches" set out in the strategic plan relevant and realistic?
- Were the headline targets and measures of success set out in the strategic plan relevant and realistic?
- How has HAP modified its programme to reflect changes in the context or in the needs of its key stakeholders?
- How has HAP sought to define and develop its relations with the "Quality and Accountability Initiatives"?

Appropriateness

Consider how HAP's approaches and activities serve its mission, and how HAP manages them:

- How effective were the different approaches in the key policies (NEP, Accreditation and Funding), the 2007-2009 strategic plan and HAP's rolling workplans in pursuing the mission and vision of HAP?
- Did HAP, including the BSO project, have the necessary resources and capacity to undertake the activities required to achieve its strategic goals?
- Are HAP's key stakeholders satisfied with the approaches and activities used to date in achieving its mission?
- Did the HAP-BSO merger significantly affect the ability of both initiatives to achieve their respective objectives?
- Has HAP's approach to the "Q & A Initiatives" been appropriate?

Recommendations

Bearing in mind that the evaluation will partially overlap with the preparation of the 2010-2012 strategic plan and with the HAP Standard Review Process, recommend:

- Changes in the situational and "SWOT" analysis to be considered in preparing the 2010-2012 strategic plan.
- Changes in strategy for scaling up and deepening impact on the quality and accountability of humanitarian action.
- Changes in managing relations with key stakeholders, including disaster survivors, humanitarian agencies, other aid and development agencies, the "Q & A" sector and donors.
- Changes in organisation and functionality of HAP's Secretariat and governance.
- Changes in revenue strategy."

Annex B: List of respondents

Annex B: Respondents

Questionnaires were sent to 158 individuals/institutions in nine main and 12 sub-categories. Fully or partially completed questionnaires and/or telephone interviews were received from/conducted with 80 respondents: a response rate of 51 per cent. The highest response rate was from HAP Secretariat staff (83%), the lowest was from donors (27%). No responses were received from HAP's seven Associate Members. At least one reminder was sent to all categories.

The following responded to the questionnaires:

1. Full Members (17 responses from 31)

1. Danish Refugee Council
2. Mercy Malaysia
3. Office Africain pour le Développement et la Coopération (OFADEC)
4. CAFOD
5. CARE International
6. Christian Aid
7. Church World Service Pakistan-Afghanistan
8. Concern Worldwide
9. Danish Church Aid*
10. Muslim Aid
11. Save the Children Fund (UK)
12. Australian Council for International Development (ACFID)
13. Community Development Centre (CODEC), Bangladesh
14. Community and Family Services International (CFSI)*
15. Medair
16. Oxfam GB
17. World Vision International

*Danish Church Aid responded long after the final deadline and after the publication of the draft evaluation report. It is suggested that DCA's response is made available to interested readers at the discretion of the Chair of HAP.

**CFSI's contribution was in the form of an email to HAP at the time of the 2009 General Assembly

2. Associate Members (0 responses from 7)

3. HAP Board members (12 responses from 22)

Current members:

- Andreas Kamm, Chair (Danish Refugee Council)
- Jonathan Mitchell, Treasurer (CARE International)
- Lisa Henry (Danish Church Aid)
- Rezaul Karim Chaudhury (Coast, Bangladesh)
- Jemilah Mahmoud (Mercy Malaysia)
- Mary Anderson (Independent)
- Matthew Carter (CAFOD)
- Matthew Frost (Tearfund)

Former members:

- Astier Almedon (independent)
- Denis Caillaux (formerly CARE International)
- Ton van Zutphen (World Vision International)
- Jane Cocking (Oxfam GB)
- Jasmine Whitbread (formerly Oxfam GB)

3. HAP Secretariat (15 from 18*)

- Nicholas Stockton
- Katharina Samara-Wickrama
- Monica Blagescu
- Barb Wigley
- Sheryl Haw
- Smruti Patel
- Coleen Heemskerk
- Ester Dross
- Jamie Munn

- Pascale Guillot
- Lieske Pott Hofstede
- Lyla Rogan
- Maria Kiani
- Emily Rogers
- Zia Chaudhury (former staff member)

*Responses were not received from the three staff members of the (recently closed) Pakistan field office although they were included in the list provided by the Secretariat. A partially completed response was also received from the former staff member Zia Chaudhury.

4. Humanitarian agencies: non HAP members (10 responses from 18)

- Caritas Australia
- Help Age International
- ICCO (Netherlands)
- UNIFEM (East Africa and Horn of Africa)
- Action Aid
- Oxfam America
- Oxfam Australia
- Intermón Oxfam (Spain)
- Oxfam Novib (Netherlands)
- Oxfam International (Humanitarian Director)

5. Field level and operational staff suggested by HAP Board members (8 responses from 21)

- Edward Hew (Mercy Malaysia)
- Elliane Arriany (Mercy Malaysia)
- Abdoulaye Dione (OFADEC)
- Nfanda Lamba (OFADEC)
- Code Cisse (OFADEC)
- Ibrahim Thiandoum (OFADEC)
- Levadatis (World Vision International)
- Eyasu Jembere Mekonnen (DanChurchAid)

6. Quality and Accountability Initiatives (3 responses from 7)

- ALNAP
- People in Aid
- Sphere

7. Other relevant organizations (4 responses from 9)

- International Council of Voluntary Agencies (ICVA)
- INTOSAI
- Ken Giunta (formerly InterAction)
- Philippines Council for NGOs

8. Donors (4 responses from 15)

- Department for International Development (UK)
- Oak Foundation
- SIDA
- Disaster Emergency Committee (UK)

9. Experts (5 responses from 10)

- Alison Joyner
- John Borton
- Mary Anderson
- Nicholas Morris
- Peter Walker

Annex C: Documents reviewed (in addition to those referred in the report footnotes)

HAP documents

- HAP Statute (revised 2008)
- HAP Medium Term Strategic Plan, 2007 - 2009
- HAP annual reports (Humanitarian Accountability Reports) for 2006, 2007, 2008.
- The Guide to the HAP Standard
- General Assembly Minutes, 2003 – 2008
- Board Minutes, 2003 – 2008
- HAP Newsletters and “The Investigator”
- Narrative Reports on HAP – BSO Project
- Evaluation of the Investigations Workshop, 2007 (K. Lattu)
- To Complain or not to complain: still the question, 2008 (K. Lattu)
- Various field trip reports
- Inter-Agency Initiatives within the Humanitarian Sector, 2002 (HAP and People in Aid)
- Humanitarian Accountability in the Sidr Cyclone Response: inter-agency workshop summary notes, 2008.
- Humanitarian Accountability in World Vision Food Aid Projects: Piloting complaint and response mechanisms, Kenya, 2008
- Mid-term review of HAP’s Q&A Promotion Project in Pakistan, 2006, A. Krstic

Other documents

- The Sphere Evaluation Report, 2004 (Van Dyke and Waldman, Columbia University)
- How the Sphere Project Came Into Being, 2003 (M. Buchanan-Smith)
- “Beneficiary Feedback: Thanks but No Thanks” (IRIN Humanitarian News Analysis, March 2009)
- Assessing the Quality of Humanitarian Evaluations (ALNAP, 2005)
- ALNAP Strategy, 2008 - 2013
- Summary Report of the Global Humanitarian Platform Meeting, July 2008 (GHP)
- Bottom-up Accountability and the Tsunami, 2005 (Roche, Kasynathan, Gowthaman)
- Statement of Commitment on Eliminating Sexual Exploitation and Abuse by UN and Non-UN Personnel (2006, IASC)
- Medair Sri Lanka Programme: Pilot Complaints Handling Mechanism, 2005
- Promise and Practice: participatory evaluation of humanitarian assistance, Tania Kaiser, Forced Migration Review no. 8
- Responsible refugee agencies should be ‘certified’, Andrew Lawday, Forced Migration Review no. 28
- Quality and Accountability Self-Assessment Report for Merlin, March 2009

Web sites

- HAP (including Ilinks listed under “Case Studies and Tools”)
- Coordination Sud
- ALNAP
- ALNAP: Q & A Initiatives, Questions and Answers; minutes of ED and Chair meetings
- People in Aid (Code of Good Practice, 2003)
- Good Humanitarian Donorship, draft work plan 2008-2009
- Sphere Project
- ECB Project
- CDA Collaborative Learning Projects