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Stakeholder analysis in NGO evaluations

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Research question

Since the 1980's, humanitarian non-governmental organisations (NGOs) have multiplied their interventions worldwide and have established themselves as privileged implementers of multilateral and bilateral donors' projects. However, after the debacle of the Rwanda genocide in 1994, the first multi-donor evaluation of the sector shed light on the malpractices of humanitarian actors in the country and the disastrous consequences this had for local populations.¹

As a reaction to increasing criticism of NGOs, a number of initiatives have been launched to professionalize and establish quality standards within the sector in order to improve humanitarian action, such as those created by Sphere, Humanitarian Accountability Partnership (HAP), and People in Aid.² With the recent materialization of the Core Humanitarian Standard (CHS) - which aims to become a system-wide reference for humanitarian quality - the conduct of NGOs will increasingly be judged by their stakeholders through a list of pre-determined criteria. The CHS combines multiple aspects of quality (financial and managerial capacity, competencies of staff, participation of beneficiaries, etc.), and addresses different stakeholders' interests in humanitarian aid.

But the interests of various stakeholders impacted by a NGO's work can be quite different. When implementing a humanitarian project, NGOs are held accountable to three types of stakeholders: the donor(s) funding their project, local populations (beneficiaries, local government, membership-based organisations, etc.) and the NGO itself (its employees, values, and partners).³ The concept of accountability can be defined as "*the means by which individuals and organisations report to a recognised authority, or authorities, and are held responsible for their actions*"⁴. The strength of these obligations can vary from formal, explicit requirements to informal, insubstantial, or even moral obligations (such as respecting local population's rights).⁵ Given that humanitarian actors are held accountable to multiple stakeholders which don't have the same influence or power over NGOs, the development of a global standard ensuring NGO accountability could potentially benefit one stakeholder's preferences and priorities over another's.

¹ Groupe U.R.D., « Actes des troisièmes universités d'automne de l'humanitaire », 22-23-24 septembre 2005, Disponible sur : http://www.urd.org/IMG/pdf/UAH2005_actes_FR.pdf

² Maietta Michel, « Origine et évolution des ONG dans le système humanitaire international. », *Revue internationale et stratégique* 2/2015 (n° 98), p. 53-59 URL: www.cairn.info/revue-internationale-et-strategique-2015-2-page-53.htm, DOI: [10.3917/ris.098.0053](https://doi.org/10.3917/ris.098.0053).

³ Adil Najam, "NGO Accountability: A Conceptual Framework", *Development Policy Review*, Vol. 14, Issue 4, pp. 339-354, 1996

⁴ M. Edwards & D. Hulme, *Beyond the Magic Bullet. NGO Performance and Accountability in the Post-cold war World*, Hartford: Kumarian Press, 1996, 285 p.

⁵ Marc Bovens, « Analyzing and Assessing Accountability: A Conceptual Framework », *European Law Journal*, 2007/4, Vol. 13, p. 450.

Which actor's interests prevail in the definition of evaluation methods? To whom are NGOs held accountable to through these methods?

Debates on the standardisation of humanitarian evaluation - how to define a “good” project, the purpose of these norms (selection of most competent NGOs, certification, iterative learning), etc. - are far from meaningless, and research on these matters raises significant issues, both theoretically and practically.

- Standards as a vehicle for power for humanitarian NGOs

In international relations, the establishment of one standard to evaluate humanitarian NGOs will give more credibility and thus more power, to those ‘CHS certified’, in a way perceived as rational and objective. NGOs able to prove their compliance with quality standards will most likely obtain more funds from donors. But ensuring compliance with standards requires sufficient resources and organisational capacities, which small, new or national NGO don't necessarily have. As a consequence, standards have the potential to make certain NGOs more powerful, whilst others will not have this possibility regardless of the actual quality of their work. So given that standards are a vehicle for power within the sector, and will most likely favour influential NGOs, it is important to determine which stakeholders' interests they are based on.

- NGOs' perception of quality

For NGOs, this standard will shape the way in which their projects are conceived and implemented. Standards not only influence how donors perceive NGOs and choose to allocate funds, they also become a reference for NGOs themselves. Although in principle NGOs act on the behalf of and in the interest of local populations, their perception of quality can be influenced by which standards are most recognized within the sector.⁶

- Standardization of humanitarian policies

Finally, this study is important to grasp current tendencies of humanitarian policies, which are increasingly technical and rationalised, and what consequences these tendencies may have on the future humanitarian system.

⁶ Erwan Quéinnec, « La performance opérationnelle des ONG humanitaires : une analyse en termes d'enjeux institutionnels », *Revue Tiers Monde*, Armand Colin, 2003/3 n°175, p. 657-681

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Introduction

NGOs are self-governing, private, not-for-profit organisations which have an explicit social mission.⁷ NGOs are embedded in civil society, as distinct from political society.⁸ Decentralisation of the state and deregulation of its services beginning in the 1980s resulted in an expansion of the sector: the number of NGOs registered in 30 member countries of the OECD almost doubled from 1,600 in 1980 to 2,970 in 1993, with a concomitant doubling of spending.⁹

Parallel to this recent expansion of NGOs, several initiatives stemming from within and outside the sector have aimed to improve the quality of NGO projects and their accountability to their different stakeholders.

Accountability can be defined as “*the means by which individuals and organisations report to a recognised authority, or authorities, and are held responsible for their actions*”.¹⁰ Quality “*is generally defined as ‘a degree of excellence’*. In the context of organisational performance it can be defined as *the way in which an organisation, through its activities and underlying management systems, succeeds in meeting the needs of its primary stakeholders*”.¹¹ So inherent in the attempt to improve quality and accountability in the humanitarian sector is the belief that NGOs should meet the expectations of their stakeholders.

In order to determine which stakeholders’ interests prevail in quality standards, this literature review will first go over current practices and debates around the evaluation of NGO work. The second chapter explains the links between quality evaluations and accountability of NGOs towards its various stakeholders. Finally, the expectations and interests of stakeholders will be presented in a third chapter.

I. Evaluation of quality in the humanitarian sphere: an overview of current practices and debates

⁷ A.C. Vakil, “Confronting the classification problem: A taxonomy of NGOs”, *World Development*, 25(12), 1997, 2057-2070

⁸ Lisa Jordan, Peter van Tuijl, “Rights and Responsibilities in the Political Landscape of NGO Accountability: Introduction and Overview”, *NGO Accountability – Politics, Principles & Innovation*, London: Earthscan, 2006, p. 3-20. This article treats NGO accountability as an issue of plurality based on the need to apply common principles and universal rights in different contexts, as opposed to being an issue of common standards, tool-box techniques or mechanisms that can be applied universally.

⁹ M. Edwards & D. Hulme, *op. cit.*

¹⁰ M. Edwards & D. Hulme, *op. cit.*

¹¹ Keystone and Accountability for the British Overseas NGOs for Development, “A BOND Approach to Quality in Non-Governmental Organisations: Putting Beneficiaries First”, August 2006, p.4 This article is based on the analysis of current approaches to quality used by NGOs (both UK and internationally), online survey of BOND members, focus group discussions with BOND members, and interviews with key opinion formers and those responsible for main standards. 2006: 69 members responded to an online survey (62% were medium-sized). May-June 2006: 4 focus group discussions (34 organisations).

A) The recent expansion of quality evaluation methods

1. A history of quality evaluation

Ever since the battle of Solferino in 1859, there have been debates on the responsibilities and qualities of humanitarian assistance.¹² But at the premises of humanitarian action, from the creation of the International Red Cross to the development of the French Doctors' movement, evaluation of interventions were rare.¹³ During the 1990s, and especially after the Rwanda crisis of 1994, these debates multiplied and developed into discussions, publications and initiatives.¹⁴

The first multi-donor evaluation (1995)

In 1995, the first multi-donor evaluation in Rwanda and neighbouring refugee camps shed light on the lack of professionalism of the humanitarian actors involved, which had fatal consequences for the refugees who died of a cholera epidemic. As a consequence, the "Study 3 of the Joint Evaluation of Emergency Assistance to Rwanda" commended to develop sector-wide performance standards¹⁵ and a system of self-management or accreditation of NGOs in order to monitor compliance with these standards.¹⁶ The Management Group of this study comprised evaluators from a selection of donor agencies and represented the donors which had commissioned the evaluation. The Steering Committee comprised policy-makers which had supported the evaluation. The composition of both of these entities at the head of a same project ensured a link between those who commissioned the study and the policy-makers at whom the findings were directed. Both actors had a "synergy of interests", which was to "improve NGO performance".¹⁷

Since, there has been a growing awareness within the sector that humanitarian action may have negative side effects (such as environmental impacts, disease outbreaks, lack of impartiality, etc.), giving birth to the widely-accepted principle to "First, do no harm".

Loss of trust in NGOs

Quality of humanitarian action has equally been questioned in mainstream media. During the tsunami in South-East Asia in 2004, media reported on quality, spending and the relevance of projects implemented. This goes to show that the previous blind trust that NGOs previously benefited from has been tarnished, and that people are losing confidence in the sector. The

¹² Dorothea Hilhorst, « Being Good at Doing Good? Quality and Accountability of Humanitarian NGOs », *Disasters*, 2002, 26(3), p. 193-212. This article is based on a review of literature and on 27 interviews about ideas and practices with humanitarian quality (2001), with representatives of humanitarian NGOs, donors and staff members of humanitarian quality initiatives.

¹³ Groupe URD, "History of quality of humanitarian action", *COMPAS Dynamique*, 2011

¹⁴ Dorothea Hilhorst, *op. cit.*

¹⁵ Although such standards already existed, their application was generally limited to a single organization.

¹⁶ Margie Buchanan-Smith, "How the Sphere Project Came into Being: A Case Study of Policy-Making in the Humanitarian Aid Sector and the Relative Influence of Research", *Working Paper 215*, Overseas Development Institute: London, July 2003, 44 p.

¹⁷ Margie Buchanan-Smith, *op. cit.*, p. 7

World Disasters report of 1999 stated that “*Increasingly, in the late 1990s, agencies working in emergencies have been battered by accusations of poor performance, and depicted as competitive corporate entities driven more by funding than humanitarian imperatives*”.¹⁸ As put by the Groupe URD, it is now “not enough to do well, one must also do it well”¹⁹.

The multiplication of quality initiatives

Consequently, since 1995 there have been series of quality evaluation initiatives within the sector: codes of conduct, charters, evaluations, learning networks, etc. This explosion of standards accelerated after the Joint Evaluation of Emergency Assistance in Rwanda (1996), and by the late 1990’s, many NGOs were engaging in formal standards, codes, charters.²⁰

The International Red Cross was one of the first organizations which sought to quantify their Code of Conduct, which was at the time a series of qualitative principles.²¹ The Code of Conduct of the Red Cross and Red Crescent Movement has 207 signatory organisations. However, some interviewees expressed concern with the manner in which it is being dealt with in practice: the code is hardly referred to in reporting and everyday practice.²² Whereas this Code of Conduct focused on the behaviour of individual workers, new aid institutions sought to increase the professionalism of humanitarian action by focusing on aid agencies and institutions (such as ALNAP, Sphere project, People in Aid, and HAP International).

Table 1: Development of Regulations, Codes, Standards, and related tools affecting NGO Quality	
1948 - Human Rights Charter	
1970s (onwards) - Participatory Monitoring and Evaluation	
1992 - InterAction PVO Standards	
1994 - The Code of Conduct for the International Red Cross and Red Crescent Movement	
1990s (onwards) - Host country codes of conduct for NGOs	
1996 (onwards) - National and Sector Certification (e.g., Philippine Council for NGO Certification 1996, InterAction PVO child sponsorship standard, 2004)	
1997 - People In Aid Code of Good Practice in the Management and Support of Aid Personnel	
1997 - Sphere Project	
1998 - Practical Quality Assurance System for Small Organisations (PQASSO)	
1999 - Projet Qualité	
2001 - Humanitarian Accountability Partnership (HAP) International	
2005 - Projet Synergé	
2005 - UK Donor Accreditation and Partnership Programme Agreements	
2005 - EC Code of Conduct for Non-profit organisations	
2006 - International Advocacy NGO Accountability Charter	

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Standards can also be country-specific coordination (such as the Sudan ground rules, the joint policy of operations in Liberia), inter-agency codes (e.g. the Code of conduct for NGOs in Ethiopia) or operation arrangements (such as the DAC-OECD guidelines on working with refugees and working in conflicts).

¹⁸ Keystone and Accountability for the British Overseas NGOs for Development, “A BOND Approach to Quality in Non-Governmental Organisations: Putting Beneficiaries First”, August 2006, 82 p.

¹⁹ Groupe URD, “History of quality of humanitarian action”, *COMPAS Dynamique*, 2011

²⁰ Keystone and Accountability, *op. cit.*

²¹ Margie Buchanan-Smith, *op. cit.*

²² Dorothea Hilhorst, *op. cit.*

²³ Keystone and Accountability, *op. cit.*

Effects and evolutions of quality evaluations

Concerning the humanitarian sector in general, some have concluded that there has been a trend towards more reductionist results focused on performance management and centralised management process in quality evaluations.²⁴

Regarding NGO work, quality evaluations have improved institutional capacities to deliver services, governance and management structures, systems and policies for NGO transparency and effectiveness, but more efforts need to be made to achieve progress in professional skills and competencies of staff.²⁵

Conclusions regarding the research question

The first multi-donor evaluation in Rwanda was commissioned by donors and involved policy-makers, whose interest was to improve NGO performance. Moreover, since NGOs have been under increasing scrutiny of media – which in turn influence individual donors – it is in their interest to show their trustworthiness through quality evaluations. Standards were progressively established by organisations which have the capacities and interest in improving the quality of aid: donors (e.g. DAC-OECD), host countries (e.g. Philippines), NGOs or coalitions of NGOs (e.g. IRCRC), or independent organisations (e.g. Groupe URD).

2. Drivers for quality and professionalization in the humanitarian sector

Authors have emphasized different explanations for the multiplication of quality standards.

For Dorothea Hilhorst, discussions on quality are related to three historical dynamics²⁶:

- The proliferation of humanitarian principles.²⁷
- The more diverse set of NGOs, and their various interpretations of humanitarian principles.
- Allegations that NGOs compete, aren't accountable to beneficiaries, disinclined to coordinate have multiplied, and recently military interventions have been presented and legitimised as humanitarian actions (such as in Kosovo, or Afghanistan).

In the Keystone and Accountability report, there are said to be three drivers for quality evaluations²⁸:

- *Values*: These are the bottom-line for NGOs and are based on the drive to help others improve their lives.

²⁴ Keystone and Accountability, *op. cit.*

²⁵ Peter Walker, Catherine Russ, Professionalizing the Humanitarian Sector – A scoping study, ELRHA, April 2010, p. 15, Available at: http://www.elrha.org/wp-content/uploads/2015/01/Professionalising_the_humanitarian_sector.pdf

²⁶ Dorothea Hilhorst, *op. cit.*

²⁷ Crises became more and more complex (e.g. intra-state wars), and existing international conventions didn't apply to all situations. As a consequence, humanitarian principles were subject to an increasing number of interpretations. However, eight principles are said to be widely shared: the four "classic" principles of neutrality, impartiality, independence, and voluntarism; as well as accountability, appropriateness, and contextualisation (Minear & Weiss, 1993).

²⁸ Keystone and Accountability, *op. cit.*

- *Stakeholder Engagement*: NGO practice has often been driven by engagement with different stakeholders, and in particular their contrasting accountability demands.
- *External Pressure*: Usually in the form of adverse publicity in the media or requirement of donors, external pressure has catalysed responses by NGOs, including self-regulation.

Other drivers include power imbalances, competition for funds, and human resource capabilities.

Donors and governments as important drivers for humanitarian quality evaluations

Within the survey conducted among BOND members, donors were identified as the main driver for adopting quality standards (82%).²⁹ Donors influence play out in at least two obvious ways: through the areas of 'organisational development' where they decide (or not) to invest funds, and the kind of reporting requirements they place upon their grantees.

Professionalization, defined as a form of managerial expertise, is the result of pressure from institutional donors and local actors.³⁰ International NGO missions are characterized by a universe of management, human resources, and financial control. This management rationale is a cognitive framework imposed by donors, as well as by local partners.

- Among the exogenous causes of professionalization, public donors have imposed criteria of good governance on NGOs (employee profile, management of programmes, evaluation, etc.) and have defined the rules NGOs must comply with in order to obtain funds. Since the 1990, some NGOs such as MSF have resisted this loss of financial independence, to guaranty their freedom to act and speak out freely. But if these sources of financing are so little contested today, it is because they give NGOs the opportunity to professionalize their structure, integrating both managerial requirements and the will to help beneficiaries.
- Professionalization of international NGOs was also motivated by their local partners. Indeed, local actors were fed up with "nostalgic adventurers" and unqualified staff of international NGOs. Professionalization was especially an expectation expressed by political and administrative authorities of host countries.

Conclusions regarding the research question

So for D. Hilhorst, the proliferation of quality evaluations can be explained by the increasingly diversified spectrum of NGOs and the interpretations of humanitarian principles (because standards enable NGOs to uphold their values), as well as by the need for NGOs to regain legitimacy vis-à-vis the media and individual donors.

The Keystone and Accountability report found that there are three main drivers which characterise NGO quality standards today: their will to improve their work in order to help

²⁹ 2006: 69 members responded to an online survey (62% were medium-sized). May-June 2006: 4 focus groups discussions (34 organisations).

³⁰ Pascal Dauvin, « Être un professionnel de l'humanitaire ou comment composer avec le cadre imposé », *Revue Tiers Monde* 2004/4 (n° 180), p. 825-840. *Methodology*. Observation of missions (Madagascar, Kosovo, Sierra Leone) in international NGOs (MSF, MDM, ACF, HI). Research began in 1998 with the *Action concertée initiative blanche* financed by the Ministry of Research, and continues today in the CERAPS.

others, their engagement and accountability to different stakeholders, and external pressure from media and donors.

Finally, donors have been identified by NGO staff and researchers as an important driver for adopting quality standards. Their influence plays out in three ways: through the areas of ‘organisational development’ where they decide (or not) to invest funds, the kind of reporting requirements they place upon their grantees, and the fact that they have imposed criteria of good governance for NGOs wishing to obtain funds. P. Dauvin found that institutional donors and local actors have put pressure on NGOs to professionalize and acquire managerial expertise (management, human resources, and financial control).

B) Means and frameworks to ensure quality of humanitarian work

1. Theoretical approaches in quality evaluations

Dorothea Hilhorst distinguishes four approaches to quality in the humanitarian sector.³¹ Each approach is comprehensive and some overlap. The main differences between approaches are the language used, emphasis on certain aspects of quality, and on what constitutes a priority. Each approach is based on a different rationale.

1. The organisational management approach³²: This approach adopts notions and instruments of quality enhancement that originate from business and industry sectors. It was the public and political demand for transparency and accountability, as well as the increasing management needs of NGOs³³ which led to the rise of quality management systems within the humanitarian sector (Slim, 1999). Quality management systems have often been considered overly managerial, lacking in substance. However, they are considered to lead to more beneficiary consultation and participation, given the high premium put on “customer satisfaction”.
2. The rights approach (1990s)³⁴: This approach is grounded in international human rights and is underpinned by the belief that humanitarian organisations have an obligation to fulfil people’s rights. Human rights standards have an aspirational undertone, conceptualise ends and means of development, and stipulate operational principles of practice (in particular participation).
3. The contingency approach³⁵: The hypothesis underlying this approach is that quality of humanitarian assistance is contingent upon the complexities of the situation

³¹ Dorothea Hilhorst, *op. cit.*

On the field, following one of these approaches has concrete implications. The training of NGO staff could, for example, focus either on administrative procedures, humanitarian law, crisis situation, or on a joint evaluation.

³² For example, InterAction’s *Private Voluntary Organizations’ Standards* (ensures accountability to donors, professional competence of the staff, and quality of services).

³³ As NGOs intervened on larger scales, increasingly worked with local partner organisations, and formed into organisational families.

³⁴ For example, Sphere’s *Humanitarian Charter and Minimum Standards for Disaster Response* (2000).

³⁵ For example, *NGO Platform for a Different Quality Approach to Humanitarian Action*.

(humanitarian action must adapt to different types of disasters, countries, cultures, etc.) and the network of other actors involved (victims aren't mere recipients of aid, but are socially differentiated, economically heterogeneous and politically motivated). This approach stipulates that humanitarian action should be grounded in situational analysis, and be adjusted to the evolutions of crises (short or long duration). Rather than relying on standards, staff should be equipped to understand the complexities with which they are confronted (Grunewald, 2001).

4. The ownership approach: This approach emphasises participation and ownership. Quality is considered to be a negotiated concept that should be formulated in a bottom-up fashion, and should focus on fostering local capacities for peace, disaster preparedness, aid and development.

Conclusions regarding the research question

Each theoretical approach to quality evaluations emphasizes different aspects of quality: accountability to stakeholders, transparency and management (organisational management approach); humanitarian principles and values (rights approach); contextualisation of standards (contingency approach); participation of beneficiaries and ownership (ownership approach).

2. Categories of systems for the management of NGO quality³⁶

There are different types of systems for the management of NGO quality.

Statutory regulations: legal requirements NGOs must adhere to in the country in which they operate (laws, international conventions, Human Rights Law, etc.).

Voluntary principles and codes: performance standards that NGOs are meant to adhere to but aren't directly enshrined in law (e.g. self-regulation).

- Sector-level: Code of Conduct (IRCRC), NGOs in Disaster Relief, PVOs, etc.
- Country-level: Usually by umbrella associations (Afghanistan, Australia, etc.)
- Issue-based Codes and Principles: some guide humanitarian action (Sphere, HAP, and People in Aid) and others are codes of good practice (ex: HIV/AIDS).
- Many are required for membership to the NGO association, and they can also act as certification requirement for government funding (ex: AusAid's Accreditation Scheme) or tax benefits (Philippine Council for NGO certification).

Organisational Management and Measurement Tools: assist NGOs in implementing and adhering to statutory regulation and normative principles, and used for general organisational development.

- Individual organisational approaches, such as ActionAid's Accountability, Learning, and Planning System (ALPS)

³⁶ Keystone and Accountability, *op. cit.*

- Proprietary Approaches: European Foundation for Quality Management (EFQM) Excellence Model, Investors in People Standard, ISO 26000, etc.
- Open-access approaches: Quality Compass, etc.

Evaluation and verification processes: the categories above can involve an assurance mechanism (external evaluation, financial/social audit, etc.).

3. Mechanisms for evaluating and monitoring

As evaluation and monitoring of NGO becomes widespread, mechanisms have been developed to facilitate the process of evaluations. Some of the most common tools include:

- Performance indicators
- The logical framework approach
- Theory-based evaluations
- Formal surveys
- Participatory methods
- Impact evaluations
- Cost-benefit and cost-effectiveness analysis
- Rapid appraisal methods
- Public expenditure tracking surveys

There are several manners that NGOs can use these tools to evaluate their work and ensure their compliance with standards:

- Self-assessment³⁷: NGOs have developed tools to carry out internal assessments of their work, generally by asking staff to assess their projects and submitting reports to senior management. Self-assessment is cheaper than other methods, encourages learning and ownership amongst staff. Furthermore, staff is well placed to understand the complexities of a project. However, self-assessments can be difficult to conduct effectively, staff may miss some elements that an external actors would see, and this methods lacks impartiality. For these reasons, self-assessments can lack credibility.
- Social audits are accountability mechanisms that adopt a stakeholder approach to assess the performance of an organisation in relation to its aims and to those of its stakeholders. This approach combines internal and external accountability, and qualitative and quantitative methods.³⁸ It is mainly represented by the People in Aid project, where it was introduced in the pilot phase (1997-2000).

³⁷ Christina Laybourn, *Evaluations of NGO International Development and Humanitarian Work*, BOND and Water Aid, 2010, Available at:

https://www.bond.org.uk/data/files/Effectiveness_Programme/Briefing_on_practices_and_debates_in_evaluation.pdf

³⁸ Dorothea Hilhorst, *op. cit.*

- Peer reviews or joint evaluations involves staff from another NGO conducting the evaluation. This method is mostly known through the work of the DAC/OECD, which uses a peer review process to review members' aid programmes, to make recommendations to one another and to generate good practice and shared objectives.³⁹ This method is relatively cheap, and can be more credible or insightful than self-assessments. However, it requires a high level of trust between organisations, which implies that the NGOs won't be in competition for funds.
- External assessments are when NGOs hire an independent consultant to assess its work. Although it is increasingly giving way to self-assessment, it is still often required by donors when large amounts of funding have been given to the NGO.⁴⁰ This method has more credibility than the others but can be very expensive.
- Accreditation involves an independent body that monitors compliance with a set of standards or codes, and decides on accreditation accordingly.⁴¹ The independent body is normally an organisation from, and mandated by, the sector concerned. Accreditation is a label under which different membership arrangements can be headed, varying in scope, level of control, and level of attention required for qualitative processes and learning. These different institutional requirements imply varying impacts on quality and accountability. Two models co-exist:
 1. Formal and legalistic models control whether organisations fulfil particular conditions regarding finance and management.⁴² ECHO is currently working to establish such mechanisms for NGOs wishing to apply for funding.
 2. Qualitative and value-based models are more comprehensive and combine self-evaluation with a peer-review or an external visitation. This approach is mainly known from Academe. It allows for both quality assurance and quality improvement (by ensuring compliance to standards while providing guidance, training, and exchange of best practices among peers).

Conclusions regarding the research question

There is a gap between standards and codes in theory and their effective application on the field. Social audits focus on accountability of NGOs to their stakeholders. NGOs prefer peer reviews and qualitative and values-based models of accreditation because they enable organisational learning. Formal and legalistic models of accreditation enable donors to allocate funds in a more efficient manner, according to the finances and management of NGOs.

C) Debates on the evaluation of humanitarian action

1. Quality and usefulness of evaluations

³⁹ Dorothea Hilhorst, *op. cit.*

⁴⁰ Christina Laybourn, *op. cit.*

⁴¹ Dorothea Hilhorst, *op. cit.*

⁴² For example, in the Netherlands fund-raising organisations are controlled to check whether they make annual reports available and if institutional overheads remain below a certain percentage of the budget.

Poor quality of evaluations and burdensome evaluation requirements of donors

Donors and authors alike have often cited poor quality as a principle concern in evaluations.⁴³ Evaluations may fail to provide any reliable insight into the achievements of NGOs and the challenges they encounter.

The principle reasons for poor quality evaluations include difficulties in gathering reliable data and information, lack of critical analysis and contextualisation, insufficient time or resources, and inexperienced evaluators.⁴⁴ NGOs often explain that they lack resources to conduct sufficiently in-depth evaluations.⁴⁵

These challenges can be linked to the complexities of project contexts in remote or unstable situations.⁴⁶ Furthermore, the pressure on NGOs to keep operating costs down and short-term funding cycles of donors means that evaluation budgets are often squeezed, and are counterproductive to long-term reflective evaluation of programme impacts.⁴⁷ NGOs also argue that evaluation requirements of donors are inappropriately burdensome, and often not proportional to the size of the NGO or the funds allocated.⁴⁸ Furthermore, the workload is compounded by donors asking for different information in their evaluations.⁴⁹ It has been suggested that it would be more efficient for donors to agree on a universal set of requirements for all evaluations by NGOs.

Usefulness and use of evaluations

Evaluations don't seem to give much information which could contribute to improving programmes. 85% of staff from the Swedish International Development Agency believe that evaluations are useless, and 41% of them believe that evaluations don't even enable to know if a project has succeeded or failed (Gibson et al., 2005, 151).⁵⁰

One of the most concerning issues of around evaluations is that the findings are not widely shared and recommendations are not implemented. An ALNAP report and an assessment of quality of DFID evaluation reports found that few evaluations are used by NGOs to bring about changes or improvements in operations.⁵¹ Furthermore, ALNAP has noted concerns within the

⁴³ Christina Laybourn, *op. cit.*

⁴⁴ Jean Ellis, "Monitoring and evaluation in the third sector: meeting accountability and learning needs", Paper presented at the 15th NCVO/VSSN Researching the Voluntary Sector Conference, 2009

⁴⁵ Rachna Sundararajan, "Making a Difference: confidence and uncertainty in demonstrating impact", *InterAction's Monday Developments* (June 2008), p.24

⁴⁶ Jean Ellis, "Monitoring and evaluation in the third sector: meeting accountability and learning needs", Paper presented at the 15th NCVO/VSSN Researching the Voluntary Sector Conference, 2009

⁴⁷ Christina Laybourn, *op. cit.*

⁴⁸ Blomeyer and Sanz, Survey of ECDG funded NGOs (2010); Ellis (2008) p.6

⁴⁹ Christina Laybourn, *op. cit.*

⁵⁰ Marc-Antoine Pérouse de Montclos, « L'aide humanitaire dans les pays en développement : qui évalue qui ? », *Mondes en développement* 1/2011 (n°153), p. 111-120, URL : www.cairn.info/revue-mondes-en-developpement-2011-1-page-111.htm, DOI : 10.3917/med.153.0111. *Methodology*: personal experience of the author in Africa, secondary sources and published evaluation reports.

⁵¹ ALNAP (2005) ; Rodger C. Riddell, "The Quality of DFIDs Evaluation Reports and Assurance Systems", IACDI, 2009, Available at: <http://iacdi.independent.gov.uk/wp-content/uploads/evaluation-quality-review-synthesis3.doc>

sector that evaluation results will not be used by donor agencies.⁵² DFID and the Dutch Ministry of Foreign Affairs admitted that they cannot yet adequately process and collate all the findings from evaluations.

Conclusions regarding the research question

Because of a lack of resources, time, or critical analysis and contextualisation, as well as inexperienced evaluators and the difficulty of collecting reliable information, evaluations can be of poor quality. These challenges have been linked to the fact that NGOs are pressured to keep costs down and depend on short-term funding cycles, the burden of multiple, varied donor requirements in evaluations, and the complexities of crisis contexts.

Furthermore, evaluations aren't necessarily perceived as useful to judge of the quality of NGO work and aren't systematically used by donors or NGOs to improve the quality of programs.

2. Standardization of humanitarian action

The unlikelihood of a unique, system-wide standard⁵³

It is unfeasible to consider an all-encompassing accountability system, even though quality and accountability are high on the agenda of humanitarian organisations and their stakeholders. A system-wide agreement on standards with a single institution that monitors compliance is unlikely because:

1. There is no single definition of humanitarian action: four approaches with different rationales co-exist. These differences can be magnified by rivalry and politicking.⁵⁴
2. Complicated and delicate questions remain, such as if, how and by whom quality standards should be imposed and controlled. Standards can vary from formal checks on management and finances, which “can be imagined as imposed by donors or legalised by governments”; to more qualitative and value-based accountability, which “seems only feasible when implemented by organisations from within the sector”.⁵⁵
 - *Direct or indirect external control* may be a way of dealing with NGOs that do not meet any quality notions because they operate with private funds, and thus aren't under the control of donors. On the other hand, control brings the risk of conditionality and political abuse, and leads to the question of “who controls the controllers?”
 - *Self-control from the sector* could take the form of regulation by an independent body, governed by members and mandated to monitor, report or sanction members. Such sectoral arrangements could enhance overall quality and deal with occasional or structural malpractice. But there is a risk that they become exclusive and turn into vehicles to defend the interests of well-resources and established NGOs.

⁵² Peta Sandison, ‘The Utilisation of Evaluations’ in *ALNAP Review of Humanitarian Action 2005*, ALNAP, 2005, p. 90

⁵³ Dorothea Hilhorst, *op. cit.*

⁵⁴ Debates on issues of quality and standards in recent years have been (inaccurately) referred to as a debate between Anglophone and francophone NGOs, for example.

⁵⁵ Dorothea Hilhorst, *op. cit.*, p. 17

It is most likely that there will continue to be different quality ‘circles’ evolving in different ways. Stakeholders like donors, the media, and local institutions can play a role in enhancing them, but in order to become meaningful and effective, sectoral quality control will have to grow out of ongoing activities in NGOs.

The possible political abuse and misuse by governments, NGOs and other actors⁵⁶

1. There is a fear that undue attention to standards turns humanitarian action into a technocratic endeavour at the expense of ethical and political dimensions.
2. When standards are made conditional, they infringe on the independence of NGOs, and may facilitate the abuse of humanitarian assistance for foreign policy.
3. When the adoption of standards is conditional to making funding available, this may lead to a humanitarian establishment inaccessible to new organisations or to those that don’t meet institutional requirements.
4. Standards may be abused to disqualify local products for relief (even though these are up to local standards), and instead rely on imported goods.

The rigidity of standards⁵⁷

1. Standards may lead to mechanistic implementation and become objectives in and of themselves rather than a means to improve practice.
2. Multiplication of standards may render them ineffective, and obsolete standards continue to linger in organisational practice.
3. Standards stifle creativity and improvising skills.

“Once standards are imposed and become part of funding conditions or even law, they become more liable to political use. [...] The more status is attached to standards the more effective they become in the eyes of proponents, and the more liable to political abuse and rigidity in the eyes of opponents.”(p. 10).

BOND members’ criticisms of standards⁵⁸

1. Standards are rarely applied effectively along the full aid chain (challenges of awareness, let alone implementation, of standards amongst field workers).
2. There is a concern that standards are being developed and driven by large organizations and therefore are not as applicable to the small and medium sized NGOs. This is compounded with fear that donors will use standards in a semi-regulatory fashion (e.g. in their funding decisions) to the detriment of smaller NGOs.⁵⁹

Conclusions regarding the research question

Standards can be abused by donors and governments in a way that is contrary to NGOs’ interests in general (limits their independence, abuse for foreign policies, or emphasis on technical rather

⁵⁶ Dorothea Hilhorst, *op. cit.*

⁵⁷ Dorothea Hilhorst, *op. cit.*

⁵⁸ Keystone and Accountability, *op. cit.*

⁵⁹ It was also noted during the consultations that smaller groups have greater willingness to tackle the core issues and be flexible and innovative.

than political aspects of aid), small or new NGOs' interests (if made conditional to funding), and to local markets' interests (if standards support imported goods). It would be easier for donors to allocate funds if NGOs are all evaluated against system-wide standards, especially if there are formal controls of management and finances.

Standards can go against the interests of NGOs (improving the actual quality of their work) if they are applied mechanistically, if they are ineffective, and if they stifle creativity and improvisation.

Regarding how to ensure compliance with standards, two conclusions can be made. External control could be in the interest of 'traditional' NGOs because it reduces the risk that NGOs funded by private sources tarnish the credibility of the whole sector in the eyes of the public or media. Moreover, self-control from the sector would be in the interest of well-established NGOs (they could use standards to defend their interests), and NGOs in general because it enables organisational learning.

3. The issue of certification

Lessons learned from the Philippines: certification and the allocation of funds⁶⁰

The Philippine Council for NGO Certification is the most fully developed example of NGO self-regulation worldwide. It is a mechanism of certification necessary to secure tax exempt status of Philippine NGOs. It has had a considerable spin-off effect in raising the stakes of NGOs standards of operation, contributing to a climate of professionalism and shared organizational learning, and of improving NGO accountability.

But the PCNC also has to guard its apolitical and unbiased reputation, which will get harder as the PCNC gains an even more central position. The limits of NGO self-regulation will climax once PCNC certification becomes a condition for receiving donor funding.

A structured and transparent process of self-regulation and certification can make an important difference in enhancing NGO accountability. But a spill-over into establishing a certified access to donor funding would create a hierarchy, wreak havoc among NGO relationships, reward conformity rather than diversified organizational behaviour, and limit the space for experimentation, start-ups or promotion of newly identified interests.

SCHR initiative for certification of NGOs against the CHS

The SCHR (Steering Committee for Humanitarian Response) has proposed to set up an independent body that will provide an external verification and certification of organisations against the CHS. The SCHR thus wishes to improve the quality and accountability of NGOs, the focus on humanitarian principles and results for affected populations, while keeping the process open to all NGOs.

But this isn't the first initiative of its kind. In 2003, HAP was set up with almost the same goals as the SCHR. But it faced several problems: the standards were too bureaucratic, too expensive

⁶⁰ Stephen Golub, "NGO Accountability and the Philippine Council for NGO Certification: Evolving Roles and Issues", *NGO Accountability – Politics, Principles & Innovation*, London: Earthscan, 2006, p. 93-108

and inaccessible to smaller NGOs.⁶¹ However, according to Stephen Golub, “Certification can clearly meet donors’ immediate concerns, helping them allocate funds”.⁶²

SCHR certification from donors’ points of view: compatibility and monitoring⁶³

Certification is seen as well adapted to the relationship between NGOs and donors, in order to certify issues of transparency and good governance of NGOs.⁶⁴

Philip Tamminga found that the SCHR initiative was generally highly compatible with donors’ funding and partnership policies, which emphasise adequate management and financial systems, largely as risk management mechanisms, but also to comply with legal requirements and increased public pressure for more transparent and objective decision-making on aid allocations. Donors also want certification to focus on accountability to affected people, not just to donors. Certification is unlikely to fully replace existing donor processes, but it could be a complement by proving additional assurances.

The added value of the CHS would be the emphasis on systematically verifying capacity, accountability and performance in different contexts at different times, given that donors lack the internal capacity and resources for field-level monitoring and assessments. The CHS certification could provide a useful framework for donors that may want to expand the number of partners, or promote the work of existing partners.

In general, there is an interest by donors in NGO certification, with most seeing it as a means to promote greater professionalism and consistency of humanitarian action, with a preference nevertheless, that a system be developed by and for NGOs.

European government donors’ policies are embedded within the European Consensus on Humanitarian Aid framework, and sometimes ECHO’s Framework Partnership Agreements (FPA - which is one of the most extensive of the GHD donors’ references).

1. CHS are largely aligned with FPA requirements: commitment to humanitarian principles, staff conduct and policies around sexual exploitation and abuse, technical capacity of NGO, coordination mechanisms, evaluations and learning.
2. But FPA is a mostly check-list process: there is a review of documentation and consultation of ECHO’s field offices, but staff turnover, heavy workloads, and day-to-day management of partner relations entails that field-level verification is limited to the project level.
3. According to donor representatives consulted, an independent verification process would provide additional assurances to donors on an organisation’s capacity, accountability and performance (backed by independently verified evidence).

⁶¹ Alex Jacobs, “Certifying NGOs ... again! What are the lessons from last time?”, NGO Performance, 29/10/2013, URL: <https://ngoperformance.org/2013/10/29/certifying-ngos-again-will-it-work-better-this-time/>

⁶² Alex Jacobs, *op. cit.*

⁶³ Philip Tamminga, “What would external verification and certification against the CHS look like from the perspective of different stakeholders?”, *Certification Review Project*, 30/09/2014, 7p., URL: <http://www.schr.info/certification>. This paper provides an overview of what verification/certification may require from different stakeholders: HAP-certified NGO, US-based NGO member of InterAction, donor government, and government authorities in a crisis-vulnerable country.

⁶⁴ V. de Geoffroy, D. Kauffmann, “L’accreditation, menaces ou opportunités pour les ONG humanitaires?”, *MedTrop*, 65 : 509-510, 2005

Certification from crisis-affected states' point of view⁶⁵

Governments were clear that they had the primary role to supervise and coordinate humanitarian action. They were wary of any certification system that would confer power on NGOs to bypass national laws and priorities in aid. But certification as a means to provide information and assurances on NGO's capacities experience and commitment to quality and accountability was fully supported. Governments don't have the necessary resources or capacity to monitor this kind of information. The value of an independent third-party verification would be that it provides credible information about NGOs.

NGOs were concerned that governments could use certification as a barrier to access, or use certification as a compliance and regulatory tool. But review project findings showed little evidence that this would be the case.

Government representatives wanted:

1. Aid actors to act impartially and without discrimination, to focus on needs, not promote partisan political, religious or commercial objectives, consult/coordinate with communities and local authorities.
2. "More than anything" governments wanted more transparency from NGOs about their plans and objectives, the resources they brought to a crises and their sources of funding, and that aid actions met technical standards and contributed to resolving the needs of affected people.
3. They wanted to ensure that the process would be open to national NGOs.
4. They accepted that continuous improvement is more important than certification.

Conclusions regarding the research question

Certification wouldn't be in the interest of NGOs because it favours competition within the sector, especially new or innovative NGOs because certification encourages conformity and favours well-established causes, and small NGOs because certification is too expensive.

Certification is in the interest of donors because it can help them to allocate funds. The SCHR certification initiative is aligned with donors expectations in evaluations because it includes management and financial aspects. The CHS corresponds to ECHO's expectations in evaluations (humanitarian principles, staff competency, technical capacity of NGOs, and coordination). Certification in general is in the interest of donors who work with many implementing partners and lack the capacities and resources for field-level monitoring⁶⁶. Donors have also mentioned that they can't evaluations to include accountability to affected communities.

Host governments are interested in certification as a complementary assurance of NGO quality (because they also lack the capacities and resources for thorough field-level monitoring), but not in certification as a means to bypass national laws. Their expectations in quality evaluations are: impartiality of NGOs, their coordination with local authorities and communities,

⁶⁵ Philip Tamminga, *op. cit.*

⁶⁶ For example, ECHO's FPA field-level verification is limited to the project level because of staff turnover, the need for day-to-day management of partner relations and heavy workloads.

transparency, that aid meets the needs of populations, and that evaluations be accessible to national NGOs.

II. Quality and accountability

A) NGO accountability: an overview

1. A history of NGO accountability⁶⁷

- The first syllogism: Complementing government (1980-1989)

1. Governments are not good at delivering public services

2. NGOs are closer to the public

3. NGOs are good at delivering public services

In this era, governments were seen as part of the problem of development (they were thought of as corrupt, too big, and inefficient). So NGOs became an increasingly preferred channel for aid funding of social service provision, in particular because they were thought to have better access to the most poor. Perceptions of NGO accountability focused on financial accountability, organizational capacity, and efficiency and performance delivery.⁶⁸

- The second syllogism: The rise of civil society (1989-1995)

1. Civil society is necessary for democracy

2. NGOs are civil society

3. NGOs are good for democratic development

This second syllogism marks the shift towards a new paradigm, when NGO accountability began to be informed by questions of democracy and governance with the end of the Cold War and the belief that civil society is crucial for democratization. The dominant discourse sought to improve the capacity of NGOs to undertake new responsibilities as harbingers of democracy. Perceptions of NGO accountability focused on quality of internal governance and the formalization of organizational intent and behaviour (codes of conduct and mission statements).

- The third syllogism: The rise of good governance (1995-2002)

1. Good governance is necessary for development

2. NGOs are not different from other organizations in civil society

3. NGOs need to apply principles of good governance

1995 saw the failure of the Washington consensus and the appearance of a new development imperative named “good governance”. NGOs became embedded in the sweep for good

⁶⁷ Lisa Jordan, Peter van Tuijl, *op. cit.*

⁶⁸ In the 1987 *World Development* issue, there was virtually no discussion of NGO accountability other than financial accountability. The focus is on how NGOs can improve their evaluation mechanisms and deliver more by ‘scaling up’ the impact of their activities.

governance as they were seen as agents of development, and were incited to respond better to the public (World Bank, 2006). This period was marked with heated discourse on NGO accountability. Perceptions of NGO accountability focused on legitimacy and establishing self-regulation or independent accreditation mechanisms.

- The fourth syllogism: The return of state supremacy (2002 onwards)

- 1. Government is essential to ensure safety and development*
- 2. NGOs influence is not in proportion to their credentials*
- 3. NGOs need to be kept in check by legitimate government frameworks.*

Perceptions of NGO accountability focused on screening credibility and promoting external (state) control (Manheim, 2003).

- The fifth syllogism: A rights-based approach (2002 onward)

- 1. There is no democratic global governance supporting universal human rights*
- 2. NGOs assert and solidify human rights in different political arenas and regardless of state governance.*
- 3. NGOs contribute to democratic governance by articulating public policy needs and practicing solutions resolving public needs.*

Perceptions of NGO accountability focused on balancing multiple responsibilities to different constituencies or stakeholders, using a variety of mechanisms, servicing accreditation rather than regulation.

Conclusions regarding the research question

Between 1980 and 1989, NGOs were essentially held accountable to their donors with an emphasis on financial aspects of aid, coverage, organisational capacity and service provision. Between 1989 and 1995, perceptions of NGO accountability focused on internal governance and the formalization of organizational intent and behaviour because NGOs were seen as harbingers of democracy. Between 1995 and 2002, perceptions of accountability of NGOs focused on legitimacy and establishing self-regulation or independent accreditation systems under the new imperative of “good governance”. Since 2002 accountability of NGOs has focused on accountability towards host governments and multiple stakeholders.

2. Accountability in the evaluation of quality

NGO responsibilities can be categorized in three ways⁶⁹:

1. Organizational responsibilities: transparency in decision-making and accounting, efficiency of operations and working within the legal confines in a transparent manner (assuming that universal rights are respected).
2. Responsibilities embedded in the mission of the NGO (e.g. promoting rights).

⁶⁹ Lisa Jordan, Peter van Tuijl, *op. cit.*

3. Responsibility to different stakeholders impacted by the NGO's activities - donors, the NGO itself (its missions, values, and staff), and beneficiaries or local populations.

The importance of accountability

The research conducted among BOND members led the authors to define quality as work based on a sensitive and dynamic understanding of beneficiaries' realities, which responds to local priorities in a way that beneficiaries feel appropriate, and is judged useful by beneficiaries.⁷⁰ Members said that quality is driven by the extent to which beneficiaries are the primary actors in processes of analysis, response and evaluation - in which continuous participation and 2-way dialogue are required between NGO and beneficiaries. As a consequence, they have a broader view of 'downward' accountability than simply reporting back to beneficiaries.

- "The quality of an NGO's work is primarily determined by the quality of its relationships with its intended beneficiaries" (p.7).
- "Members were explicit in arguing that, for NGOs, quality depends on the relationships with beneficiaries taking priority over the achievement of pre-determined project goals and other 'professional' management practices" (p. 7).

The overwhelming response to 'What drives quality in your work?' was that "*the main driver of good work is the quality of relationships between development actors along the aid chain, both within NGOs (internal) and in the links to stakeholders and partners (external)*" (p. 50)", and that there needs to be 'meaningful participation' and 'ongoing dialogue' with beneficiaries for high quality interventions.

Conclusions regarding the research question

According to BOND members, quality of NGO work is strongly linked to the quality of their relationships with beneficiaries and other stakeholders.

3. Debates on the technicity of accountability approaches

There is a concern among BOND members that the approaches to quality focus too much on technical aspects of aid delivery (how to understand and implement standards), as opposed to addressing more strategic issues (what we are doing and why, who are we working with).⁷¹ The article concludes that the challenge lays not in the technical conversation, but in the political and strategic one: "*NGOs deliver quality work – i.e., progressive social change – when they engage in internal and external relationships in ways that foster ongoing accountability to their intended beneficiaries*" (p.50).

Conclusions regarding the research question

BOND members oppose technical approaches to quality evaluations (implementation of standards, service delivery) and strategic ones (relationships which ensure accountability, what, why and with whom aid is delivered). Only strategic approaches ensure that NGOs will deliver quality work (i.e. progressive social change).

⁷⁰ Keystone and Accountability, *op. cit.*

⁷¹ Keystone and Accountability, *op. cit.*

B) Multiple accountabilities of NGOs

1. Accountability to donors

There have been debates among practitioners and academics on the methodologies necessary to evaluate humanitarian action, particularly at the OCDE and European Union; but specialists have especially focused on evaluation modalities and objectives that hold NGOs accountable to their donors, much more than to recipients of aid.⁷² Accountability mechanisms often focus on the relationship between donors and NGOs, or governments and NGOs.⁷³

It has been suggested that efforts to improve NGO quality and accountability would have some spin-off on other accountability relations, starting with donor accountability: Sphere, for example, could be used as an argument to obtain funding.⁷⁴

Conclusions regarding the research question

According to several authors, quality of NGO work has often been evaluated according to their accountability to donors more than to beneficiaries (Pérouse de Montclos), and mechanisms often focus on accountability to donors (Ebrahim).

2. Internal accountability (NGO staff, missions, values)

Interviews with NGO staff showed that quality enhancement measures often increase internal accountability and favour learning processes, although to avoid media exposure a lot of internal reports and evaluations are confidential.⁷⁵

The discussion on accountability of NGOs rarely links responsibilities with the rights to associate freely, assemble and articulate a voice, which has led to narrow technical solutions that often do not reflect the mission or values of an NGO or the multiple important relationships in which they are engaged.⁷⁶

Conclusions regarding the research question

Quality enhancement measures can be in the interest of NGOs because they can increase internal accountability and learning dynamics, although NGOs fear that such evaluations be made public by the media (Hilhorst). Accountability of NGOs is often viewed as a technical issue, rather than linked to their missions or values (Jordan, van Tuijl).

3. Accountability to beneficiaries

Beneficiaries' satisfaction as a means to evaluate quality⁷⁷

⁷² Marc-Antoine Pérouse de Montclos, *op. cit.*

⁷³ Ebrahim, A., "Accountability in practice: mechanisms for NGOs", *World Development*, 31(5): 813–829, 2005

⁷⁴ Dorothea Hilhorst, *op. cit.*

⁷⁵ Dorothea Hilhorst, *op. cit.*

⁷⁶ Lisa Jordan, Peter van Tuijl, *op. cit.*

⁷⁷ Marc-Antoine Pérouse de Montclos, *op. cit.*

Since interventions are more determined by supply than demand, evaluations focus more on the functioning of mechanisms than on the satisfaction of beneficiaries (Crombrugghe et al., 2005, 13). By basing their analysis on interviews with donors or operators, evaluators privilege the assertions of “professionals”, thus neglecting field work and the evolution of local populations’ socio-economic status.

Evaluation practices have evolved towards more inclusion of beneficiaries opinions to assess performance of humanitarian organisations.⁷⁸ But satisfaction enquiries are rare, and aren’t systematically included in evaluation methods - officially because of their costs and the difficulties to access certain zones, but in reality because of the modalities of analysis, which are distorted by donors’ requirements.

Challenges in accountability towards beneficiaries

- No practical guidelines⁷⁹

The principle of accountability to beneficiaries is indicated in various standards and approaches. But, as was noted frequently by BOND members in the consultations, there is as yet no fully articulated set of practice guidelines that delineate this principle in action. Nor are there adequate support materials.

- Obstacles to effective participation of beneficiaries⁸⁰

For many years, NGOs have explored the use of participatory approaches with beneficiaries and others as a key strategy for improving the quality of their work. But two minor and two major problems remain:

Minor

1. Lessons learned from participation from the field have not been scaled-up and brought into organisational strategy, or indeed influenced a general understanding of what really works in development.
2. Participation has often been transported from the development experience into humanitarian work, where it is not wholly applicable and has therefore undermined quality. A fracture persists between development and humanitarian experiences.

Major

1. Participation has confined itself mainly to practice in the field, and there remain real governance gaps in terms of the involvement of beneficiaries in strategic decision-making and public reporting processes.
2. Bad practice still remains and can be quite damaging and distort good quality work.

⁷⁸ For example, whereas the multi-donor evaluation in the Great Lakes region in Africa in 1995 had only included 140 recipients for 620 interviews in total, 78% of the interviews in South-East Asia after the tsunami of 2004 were of beneficiaries.

⁷⁹ Keystone and Accountability, *op. cit.*

⁸⁰ Keystone and Accountability, *op. cit.*

For NGO staff, satisfaction enquiries aren't feasible, notably because the implementer's actions aren't necessarily visible to local populations.⁸¹ So these types of evaluations present the inconvenience of giving a negative image of situations in which operators are efficient. Furthermore, beneficiaries in crisis contexts tend to express their despair and don't have any reason to say they're satisfied.

Conclusions regarding the research question

Quality evaluations don't systematically include an analysis of beneficiaries' level of satisfaction: they rather focus on the functioning of mechanisms, interviewing donors or operators, several problems exist in satisfaction enquiries (actions not visible, beneficiaries are in a situation of despair), and because donors' requirements don't push for such satisfaction enquiries.

There is a gap between accountability to beneficiaries in theory, standards and on the field (how to apply it).

Participation of beneficiaries, a component of accountability, encounters four problems: experiences stay at the local level (no scaling-up), lack of adaptation of participation from development to humanitarian sectors, lack of involvement of beneficiaries in strategic decision-making, governance (only on the field), and bad practice.

4. Conflicts between accountability of NGOs to different stakeholders⁸²

NGOs face a number of practical difficulties in implementing participatory approaches, especially given the constraints determined by competing accountabilities to other, often more powerful actors along the chain of relationships, the need to survive and respond to donor expectations. One of the major gaps in standards is their ability to balance the interests of the full spectrum of stakeholders, in particular the recognition of the primacy of the beneficiary.⁸³

In order to put accountability to beneficiaries first, the sector needs to start by examining relationships between donors and implementing partners, and consider whether current organisational practices and priorities actively foster appropriate relationships between beneficiaries and NGOs. Practical tensions exist between 'accountability to beneficiaries' and existing organisational arrangements. Organisational tools like logical frameworks, or inflexible budgets — and other problems that result from too great a focus on relationships with (and accountability to) donors — are both commonplace in NGOs, and get directly in the way of allowing field staff to develop trusting relationships with beneficiaries and local partners (which requires autonomy and flexibility). When BOND members have said that relationships with beneficiaries have to come first, they've also said that they have to be the priority in drawing up organisational systems or in assessing the value of external standards. This

⁸¹ In Uganda, for example, a survey carried out in 2002 among 2566 beneficiaries showed that their satisfaction declined as NGOs' presence in the area lengthened, because communities developed and their expectations consequently increased (Barr & Fafchamps, 2004).

⁸² Keystone and Accountability, *op. cit.*

⁸³ Keystone and Accountability, *op. cit.*

prioritisation seems to be widely lacking, with a belief that NGOs can have logical frameworks and water-tight financial control at the same time as achieving authentic participation. These key tensions may help explain why so much of the attention on accountability to date does not appear to have delivered quality on the ground.

The main problem, however, does not lie mainly within the relationships between donors and NGO HQ. The consultation with members has shown that in many cases, NGO HQ behaves in practice as a donor with its field offices or southern partners, while this may also be true in the relationship between southern partners and communities, in other words, within bilateral relationships along the chain. Where asymmetric power and resources determine a principal-agent relationship, the focus of organisational systems on enabling adequate participation seems lagging.⁸⁴

Conclusions regarding the research question

Mechanisms and practices which ensure accountability of NGOs to donors (e.g. log frame, inflexible budgets) weaken NGOs' capacity to be accountable to local populations, promote effective participation, and develop trusting relationships with them. It is difficult, within evaluations, to balance the interests of all stakeholders.

The tensions between accountability to different stakeholder seems to take place not only between NGOs and donors, but between different levels of power relationships (donor-HQ, HQ-field offices or partners, partners-communities, etc.).

III. Which actors' interests prevail in evaluation methods?

A) Expectations of donors in quality evaluations

There is a set of criteria used by institutional donors to evaluate humanitarian assistance. Those widely shared, and adopted by the OECD, include: relevance, effectiveness, efficiency, impact, sustainability, coverage, connectedness, coherence and appropriateness of interventions. But interpretation of criteria and the weight attached to each aspect accounts for different views (Frerks & Hilhorst, 1999).

1. Evaluating humanitarian action using the OECD-DAC criteria

In 1991, the Development Assistance Committee of the OECD set out broad principles for evaluation of development assistance of DAC members countries and multilateral financial institutions (e.g. UNPD, World Bank, IMF), which were refined into 5 criteria – effectiveness, impact, sustainability and relevance. Although these standards are intended for DAC members, they have been adopted by other development actors. The DAC evaluation criteria are currently at the heart of the evaluation of humanitarian action (EHA), and many current standards draw on the DAC criteria (e.g. DFID's guidance notes for NGO evaluations). ALNAP has adapted

⁸⁴ Keystone and Accountability, *op. cit.*

the criteria for evaluation of complex emergencies in 1999, by turning them into a set of 7 criteria: relevance/appropriateness, connectedness, coherence, coverage, efficiency, effectiveness, impact.⁸⁵

- Relevance / appropriateness

Relevance is concerned with assessing whether the project is in line with local needs and priorities (as well as donor policies). Appropriateness is the tailoring of humanitarian activities to local needs, increasing ownership, accountability and cost-effectiveness accordingly. For this criteria to be fulfilled, there need to be adequate need assessments and understanding of and support for the livelihoods and capacities of the affected population.

- Connectedness

Connectedness refers to the need to ensure that activities of a short-term emergency nature are carried out in a context that takes longer-term and interconnected problems into account. Connectedness has been adapted from the concept of sustainability (i.e. interventions should eventually be managed without donor input).

- Coherence

Coherence is the need to assess security, developmental, trade and military policies as well as humanitarian policies, to ensure that there is consistency and, in particular, that all policies take into account humanitarian and human-rights considerations. Evaluators need to pay close attention to the mandates, agendas and principles of different actors, and evaluate whether these mandates contradict or complement each other (e.g. military and NGOs).

- Coverage

Coverage is the need to reach major population groups facing life-threatening suffering wherever they are. Coverage is linked closely to effectiveness, and is often assessed with numbers or percentages. Coverage can be assessed at three levels: international (comparing emergencies), national and regional level, and local level (who received support and why). Since aid priorities should be calculated on the basis of need alone, coverage is in relation with targeting and assessment. But there are different perspectives, culturally determined, on what constitutes need. *“Evaluators need to be sensitive to this issue and determine whether targeting practices, often determined by donor governments, are appropriate from the perspective of primary stakeholders”*⁸⁶ (i.e. beneficiaries).

- Efficiency

Efficiency measures the outputs – qualitative and quantitative - achieved as a result of inputs.

⁸⁵ ALNAP, *Evaluating humanitarian action using the OECD-DAC criteria: An ALNAP guide for humanitarian agencies*, London: Overseas Development Institute, March 2006. This guide for evaluation builds on *Evaluating Humanitarian Assistance Programmes in Complex Emergencies* (Hallam, 1998 – for evaluators) and *Guidance for valuating Humanitarian Assistance in Complex Emergencies* (OECD-DAC, 1999 – for commission agencies), in order to provide a framework designed to assist with the interpretation of key DAC criteria within a humanitarian context.

⁸⁶ ALNAP, *op. cit.*

Efficiency assessments start with financial data, and are linked to appropriateness of choice of intervention, and effectiveness.

Political priorities of governments and agencies may cause interventions to be inefficient.⁸⁷ Evaluators need to take into account political factors, and how these factors often determine why an intervention was efficient or not. Response to a crisis for political reasons, or the need for a high profile, and subsequent inadequate need assessment, has often meant that resources are not provided in an efficient manner.

- Effectiveness

Effectiveness measures the extent to which an activity achieves its purpose, or whether this can be expected to happen on the basis of the outputs. Implicit within the criterion of effectiveness is timeliness, and evaluation involves an analysis of the extent to which stated intervention objectives are met.

The evaluator's role is to attempt to evaluate the intervention against stated objectives or agency or government standards, rather than activities. *"Understanding and analysing the perspectives of primary stakeholders, and comparing these perspectives with those of other humanitarian actors, such as agency staff, should be a key element in determining whether interventions have met their objectives"*⁸⁸.

- Coordination

Coordination isn't a formal DAC criterion, but is important and consists of *"the systematic use of policy instruments to deliver humanitarian assistance in a cohesive and effective manner"*⁸⁹. Assessments of coordination focus on practical effects of actions of governments and agencies (joint cluster groups, targeting, and sharing of information). The multiplicity of actors (donors, NGOs, UN system, etc.) and roles of host governments and other local institutions are to be considered.

- Impact

Impact looks at the wider effects of the project – social, economic, technical, and environmental – on individuals, gender and age-groups, communities and institutions. Impacts can be intended or not, positive or negative, macro (sector) and micro (household). Evaluations focus on longer-term consequences of achieving or not the objectives, and take into account wider socioeconomic/political context and change).

2. Relative importance of each criteria

Different importance given to each criteria

⁸⁷ For example, a host government may not want piped water provided to refugees if it does not want them to encourage them to stay on its territory; or a donor may want to supply goods by air as this provides it with a higher profile in the media.

⁸⁸ ALNAP, *op. cit.*, p. 51

⁸⁹ ALNAP, *op. cit.*, p. 54

It is difficult for any organisation to achieve high results in every quality criteria, since improving one aspect of quality may undermine another.⁹⁰ For example, achieving highest levels of coverage may not be the most efficient way of using resources. So humanitarian actors often have to prioritise one aspect of quality over another. Although the majority of humanitarian actors would agree with all of these criteria, they may differ in their relative importance.

Donors' priorities in evaluations

Over the past decade, issues of increased transparency and accountability between donors and recipients of aid have risen. *“Embedded in this donor-driven push for accountability is the belief that projects or programmes should be able to demonstrate that they are ‘effective’ in order to qualify for international assistance”*.⁹¹

Furthermore, use of the DAC criteria has tended to focus on results rather than processes. But there is nothing inherent in the criteria which stops evaluators using them from asking ‘why’ questions. EHA tends to concentrate on what happened rather than why it happened, which does not maximise support to lesson-learning.

Conclusions regarding the research question

Donors have several expectations in quality evaluations:

- ECHO's evaluations include assessments of respect of humanitarian principles, staff competency, technical capacity, and coordination.
- Evaluations have aimed to improve NGO performance.
- Evaluations should show what happened and which results were achieved.
- When directing funds and evaluating quality, donors focus on good management of NGOs (professionalization), and finances.
- Efficiency is in the interest of donors which provide the resources, although political priorities of governments and agencies may lead to inefficiency (e.g. need for high profile interventions).
- Donors believe that projects should demonstrate their effectiveness.

B) Interests of NGOs in evaluations of quality

1. NGOs in general

The challenge of transparency⁹²

Transparency is a major challenge for NGOs: it is necessary for NGOs to be trusted, but transparency can also be damaging for their image. The problem of transparency is exemplified in evaluations: these offer a tool for learning and accountability, but there are concerns that they will deliver neither or even give a bad image of NGOs.

⁹⁰ P. Knox-Clarke, “What is Effectiveness? It depends on where you are...”, *Addressing Humanitarian Effectiveness*, southasiadisasters.net, n° 121, December 2014, pp. 1-3

⁹¹ D. Steinbach, “Evaluating the Effectiveness of Finance for Community-Based Adaptation”, *Addressing Humanitarian Effectiveness*, southasiadisasters.net, n° 121, December 2014, pp. 4-5

⁹² Keystone and Accountability, *op. cit.*

Evaluations and organisational learning

According to the online survey, 56% of NGOs believe that organisational learning systems are “critical” for quality to be improved.⁹³ But only 1.5% were actually learning and training staff. There is a practical tension between performance and learning within organisations: in large NGOs, the domains of ‘performance/quality’ and ‘learning’ are usually divided and are taken up by different people and often disconnected areas. In smaller organisations, where fewer people play multiple roles, there is often not enough time or resources for organisational learning to take priority. Ongoing learning and reflection is only possible when there is openness to discussing failures as well as success.

During focus groups, members expressed that evaluations should encourage critical questioning of approach and direction: external questions that help reflect, qualitative standards around ensuring stakeholder input into project processes, etc.⁹⁴ Quality should be an aim for continual improvement, and not just about ticking boxes.

Another of the common problems cited is the sometimes contradictory purpose of conducting an evaluation.⁹⁵ Evaluations are intended to highlight both the successes and challenges experienced during a programme of work. However, evaluations are also often commissioned at the request of donors. NGO professionals see this as creating dual pull between learning from mistakes, and accounting to your donor⁹⁶. If future funding is in any way influenced by the NGO’s previous achievements, there are clear incentives to emphasise successes, and minimise failures. However, by not reporting or examining any challenges, valuable learning opportunities are missed, both by the subject NGO, and by others who read the evaluation.

Compliance with standards⁹⁷

In terms of external assurance, there is some appetite for peer review and/or social audit, but little for certification. Whatever the standard, it is generally accepted that they should enable a mix of self-criticism, learning and continual improvement, not only on the part of NGOs, but also those stakeholders working with them.

The importance of relationships, qualitative aspects, and strategic issues⁹⁸

In focus groups, NGOs expressed that the quality of relationships with stakeholders (beneficiaries, local partners, donors, staff, etc.) have a high value in determining the quality of their work.

Furthermore, participants are wary that standards might lean towards more service orientated, less rights focused, intangible areas of NGO work (i.e. work easily counted), which might lead to stifling creativity, innovation and confine NGOs to measurable work. During focus groups, NGOs stressed that quality evaluations should address strategic issues and not only operational

⁹³ Keystone and Accountability, *op. cit.*

⁹⁴ Keystone and Accountability, *op. cit.*

⁹⁵ Christina Laybourn, *op. cit.*

⁹⁶ Summary Report: European M&E Workshop INTRAC, 2005, p. 8

⁹⁷ Keystone and Accountability, *op. cit.*

⁹⁸ Keystone and Accountability, *op. cit.*

(technical) ones. Current standards are geared towards delivery of outputs and metrics, overemphasise technical fixes to work and not examine processes that lead to quality work. The challenge is how to communicate and articulate quality “as a process and not a product”. A question remains whether standards and frameworks on offer help to organisations to examine strategies (rather than projects).

To conclude, when BOND members were asked “*What do NGOs look for in determining quality in their programme work?*”, they answered that: Standards need to be linked to values and principles, be flexible and adaptable⁹⁹, encourage self-criticism and questioning of organisational direction, address strategic issues and not be solely operational (technical), aim for continual improvement, and enable comparison across the sector. They also stressed that “*Quality standards should be driven by beneficiary voice*”¹⁰⁰.

2. Interests of NGOs in evaluations according to their size

Only relatively large organisations were most open to support common standards or approaches to quality, while smaller and the largest NGOs were generally not supportive of the idea.¹⁰¹ Two issues were mentioned: the fact that for quality standards, “*one size does not fit all*”, and that an over-emphasis on external standards can inhibit learning within organisations. Moreover, participants highlighted the risks associated with disregarding the limited capacity of small and medium organisations to comply with formal standards.

46% of respondents say ‘accountability to beneficiaries’ is a main driver ensuring their work is of a high standard.¹⁰² When asked what they looked for in determining the quality of their work, BOND members stressed the importance of meaningful participation of beneficiaries, and of their voice, perspective and involvement as a key element in defining quality and lasting impact of interventions.

In terms of the BOND membership however, larger organisations assign the most importance to accountability to beneficiaries and partners as a driver of working more with quality issues, as opposed to smaller organisations. Consultations showed, however, an interesting difference between ‘accountability to beneficiaries’ as a ‘market driver’ (e.g. for reputation or access to funding) and a strong consensus that adequate accountability to beneficiaries is the actual condition for quality of an intervention. This explains the difference in the perception of members: larger NGOs are the ones at the centre of external pressures on accountability issues, while smaller NGOs are not very exposed to the accountability debate yet. In both cases, apart from the market signals, accountability to beneficiaries emerges as the central issue.

⁹⁹ In order to take into account organisational context, size, resources and context of work in different locations. Linked to context and flexibility is the question of who develops and sets standards: for many, this has to be done in collaboration with partners, staff, and programme participants if there is to be ownership.

¹⁰⁰ Keystone and Accountability, *op. cit.*, p. 11

¹⁰¹ Keystone and Accountability, *op. cit.*

¹⁰² Keystone and Accountability, *op. cit.*

Moreover, all talked about the challenge of ensuring meaningful participation (resources, time and skills), particularly for smaller NGOs.

3. National NGOs

*“National NGOs tend to be more interested in certification, possibly because they see it as a way to demonstrate professionalism to donors and partners.”*¹⁰³

Conclusions regarding the research question

Evaluations can improve the media's and general publics' perception of NGOs:

- Evaluations can prove NGOs are trustworthy and give them a good image. It's in their interest if evaluations can prove they are transparent and accountable.
- Evaluations can be used to reaffirm the respect of humanitarian principles and uphold NGOs' values in reaction to the proliferation of NGOs and their interpretations of these principles. External control of compliance is in the interest of NGOs which meet quality expectations, because it would reduce the risk of NGOs funded by private sources tarnishing the credibility of the entire sector.
- Evaluations can enable NGOs to regain legitimacy in reaction to increasing criticism (e.g. lack of downward accountability and coordination, confusion with military).

NGOs want evaluations which:

- Aren't service-oriented nor focus on tangible work
- Leave space for innovation and creativity
- Address strategic aspects of aid (not just projects) and processes (not just results).
- Linked to values and principles
- Be flexible and adaptable
- Encourage self-criticism and questioning of organisational direction, aim for continual improvement
- Enable comparison across sector
- Quality standards “should be driven by beneficiary voice”. BOND members recognize that quality is strongly linked to the quality of their relationships with beneficiaries (meaningful participation and ongoing dialogue) and other stakeholders (internal, external).

Donors are identified as the main driver for adopting quality standards by 82% of BOND members. NGO's interest is to obtain funding from donors.

- It isn't in the interest of new or small NGOs for standards to be made conditional to funding because they are developed by larger NGOs. So standards are in the interest of larger and well-established NGOs. Moreover, small and medium NGOs don't have the capacity to comply with formal standards.

¹⁰³ CHS Alliance, *op. cit.*

- Accountability to beneficiaries is a key component of quality for all NGOs, but larger ones only see it as a means to improve their market share (reputation, access to funding). Smaller NGOs don't necessarily have the capacity to ensure meaningful participation.

Interests of NGOs in the use of standards:

- It isn't in the interest of NGOs for standards to be abused in a way that limits their independence (used for foreign policy, emphasis on technical rather than political or ethical aspects of aid).
- Accreditation is in the interests of NGOs which have the capacity to be accredited.
- Certification as a condition for access to funds wouldn't be in the interest of NGOs because it creates competition, especially innovative or new NGOs because it encourages conformity and favours well-established causes. Certification is too expensive for smaller NGOs. Certification is in the interest of national NGOs because it gives them more credibility.

Evaluations are in the interest of NGOs if they are used in ways which promote organisational learning (because it enables effectively improving the quality of their work):

- Organisational learning is facilitated by evaluations with questions and qualitative standards.
- Organisational learning is possible when standards are enforced through peer reviews, qualitative and values-based models of accreditation, self-control from the sector¹⁰⁴, or self-assessment by NGO staff themselves.

C) Interests of beneficiaries in evaluations

One of the main differences noted between stakeholders' expectations in humanitarian projects is the fact that funders and providers of aid consider accountability by focusing on measuring *what* happened (the assistance received, whether it was appropriate, delivered on time, etc.), whereas crisis-affected communities were equally concerned with *how* assistance was provided.¹⁰⁵

While humanitarian agencies seek to strengthen accountability through formal policies, frameworks and procedures (providing information to communities, feedback and complaint response mechanisms, staff dedicated to ensuring accountability), crisis-affected communities have put forward "close personal engagement" between humanitarian staff and themselves as central to accountability.¹⁰⁶ People from affected communities emphasised that accountability and effectiveness depended on good relationships, they expressed the need and demand for respectful, competent staff who are close to communities, understand the culture, have good communication skills, act impartially, etc.

¹⁰⁴ Although self-control might be used by well-established NGOs to promote their own interests.

¹⁰⁵ CHS Alliance, *op. cit.*

¹⁰⁶ CHS Alliance, *op. cit.*

Furthermore, in the WHS consultation process, crisis-affected people asked that those who violate international humanitarian, human rights, and refugee laws be held accountable. So crises-affected communities have other expectations that having their immediate needs met more effectively.¹⁰⁷

Conclusions regarding the research question

Among the criteria used in most evaluations, those most in beneficiaries interests include:

- Relevance (in line with local needs)
- Appropriateness (ownership, accountability)
- Connectedness (reduces their dependency)
- Coverage - although targeting of beneficiaries is often determined by donor governments and aren't always appropriate from beneficiaries' points of view
- Impact (wider effects of project)

When asked what matters most, beneficiaries stress the importance of measuring how aid was provided (and not just *what* was provided), of relationships between beneficiaries and staff, the engagement and behaviour of staff (respectful, competent, closeness, comprehension of locals), and not just the formal policies and procedures that NGOs focus on. Crisis-affected people also asked that those who violate international humanitarian law, human rights and refugee laws be held accountable.

¹⁰⁷ CHS Alliance, *op. cit.*

Theory: multiple accountabilities of NGOs in quality evaluations

I. Multiple and competing accountabilities of NGOs

Theoretically, NGOs are held accountable to three main stakeholders in evaluations.

Mark Bovens proposes an analytical framework to apprehend the concept of accountability, which he defines as “*the obligation [for an actor] to explain and justify conduct [to a forum]*”.¹⁰⁸ An actor is obligated, formally or informally, to provide information to a forum, and the forum can interrogate the actor and judge its conduct. Contrary to the concept of participation, accountability implies that an actor can face consequences for his or her actions. There are different types of accountability (financial, procedural, programmatic, etc.) and actors can be held accountable by different means. Being accountable to multiple forums will diversify the information the actor must provide, the criteria it must comply with, and its obligations in general. M. Bovens distinguishes between two types of accountability: vertical accountability (e.g. NGOs and their funders maintain a hierarchical relationship, funders wield power over NGOs through funding) and horizontal, informal, voluntary accountability (e.g. NGOs have a moral or formal obligation to be accountable to local populations).

NGOs are held accountable to three main actors: the donors funding their project, clients of aid (beneficiaries and local government) and the NGO itself (its staff, missions, and partners).¹⁰⁹ They are held accountable to these stakeholders either formally (obligations concerning their contracts, service-delivery, appropriate spending of financial resources, and regular reporting of activities), or morally (attaining the NGO’s goal – e.g. respect of Human Rights – and promoting beneficiary participation).¹¹⁰

Quality evaluations are one of the means that hold NGOs accountable. Some methods of evaluation may encompass different types of accountability (financial, programmatic, etc.) which emphasise either formal or moral aspects, and may combine both vertical and horizontal accountabilities (to donors and beneficiaries). So NGOs can be held accountable to donors, themselves (their missions, staff, and partners) and beneficiaries through quality evaluations. However, some accountabilities are characterized by vertical relationships (donors and NGOs), whereas others are horizontal ones (NGOs and beneficiaries). In evaluations, the focus on

¹⁰⁸ M. Bovens, *op. cit.*

¹⁰⁹ Adil Najam, “NGO Accountability: A Conceptual Framework”, *Development Policy Review*, Vol. 14, Issue 4, pp. 339-354, 1996

¹¹⁰ Adil Najam, *op. cit.*

So, for example, a NGO implementing a health programme in a conflict zone could be evaluated on different levels: whether or not the NGO effectively distributed medical kits to the targeted population, is able to account for the funds they spent doing so, and ensured participation of beneficiaries in the different phases of their programme.

certain types of accountabilities (financial, programmatic, etc.) and the emphasis on moral or formal aspects of accountability will reflect certain stakeholders' priorities rather than others.

Indeed, accountabilities to different stakeholders of NGO projects can oppose one another, and each actor along the aid chain tends to emphasize certain aspects of quality over others.

It is difficult to balance the interests of all stakeholders, not only between NGOs and donors, but between all levels of power relationships (donors-HQ, HQ-field offices or partners, partners-communities, etc.).¹¹¹ In quality evaluations, organisations cannot achieve high results in every criterion so humanitarian actors will often prioritise one aspect of quality over another; for example, donors may prioritise efficiency, field staff coverage while local communities would focus on relevance.¹¹²

Thus, holding NGOs accountable to various stakeholders whose interests differ can be problematic. Practical tensions exist between 'accountability to beneficiaries' (horizontal accountability) and existing organisational arrangements which are the result of donor requirements.¹¹³ Organisational tools like logical frameworks, or inflexible budgets — and other problems that result from too great a focus on relationships with (and accountability to) donors — are both commonplace in NGOs, and get directly in the way of allowing field staff to develop trusting relationships with beneficiaries and local partners (which requires autonomy and flexibility). When BOND members have said that relationships with beneficiaries have to come first, they've also said that they have to be the priority in drawing up organisational systems or in assessing the value of external standards. This prioritisation seems to be widely lacking, with a belief that NGOs can have logical frameworks and water-tight financial control at the same time as achieving authentic participation.

II. Interests of main stakeholders in evaluations

Stakeholders have different interests or expectations in quality evaluations of NGOs.

Donors' expectations

According to a survey distributed across the Swedish International Development Agency, a large percentage of staff don't see the usefulness of evaluations (85%) and don't believe they give information on the success or failure of a programme (41%). But on the other hand, donors in general were identified by NGOs as the main driver for the of quality standards. So donors have other interests in evaluations than simply ensuring the programme was successful.

¹¹¹ Keystone and Accountability, *op. cit.*

The consultation with BOND members has shown that in many cases, NGO HQ behaves in practice as a donor with its field offices or southern partners, while this may also be true in the relationship between southern partners and communities, in other words, within bilateral relationships along the chain: where asymmetric power and resources determine a principal-agent relationship, the focus of organisational systems on enabling adequate participation seems lagging.

¹¹² P. Knox-Clarke, "What is Effectiveness? It depends on where you are...", *Addressing Humanitarian Effectiveness*, southasiadisasters.net, n° 121, December 2014, pp. 1-3

¹¹³ Keystone and Accountability, *op. cit.*

According to the literature, donors' expectations or interests in quality evaluations are:

- Assessments of the respect of humanitarian principles, staff competency, technical capacity of NGOs, and their coordination with other aid actors (criteria of ECHO evaluations).
- Improving NGO performance, efficiency, effectiveness, organisational (professionalization) and financial management.
- Showing what happened and which results were achieved.

Beneficiaries' interests in evaluations

When asked what matters most, beneficiaries stress the importance of measuring how aid was provided (and not just *what* was provided), of relationships between beneficiaries and staff, the engagement and behaviour of staff (respectful, competent, closeness, comprehension of locals), and not just the formal policies and procedures that NGOs focus on. Crisis-affected people also asked that those who violate international humanitarian law, human rights and refugee laws be held accountable.

Among the criteria used in most evaluations, those primarily in the interest of beneficiaries include:

- Relevance (in line with local needs)
- Appropriateness (ownership, accountability)
- Connectedness (reduces their dependency)
- Coverage - although targeting of beneficiaries is often determined by donor governments and aren't always appropriate from beneficiaries' points of view
- Impact (wider effects of project)

NGOs interests

NGOs want evaluations which:

- Aren't service-oriented nor focus on tangible work
- Leave space for innovation and creativity
- Address strategic aspects of aid (not just projects) and processes (not just results).
- Linked to values and principles
- Be flexible and adaptable
- Encourage self-criticism and questioning of organisational direction, aim for continual improvement¹¹⁴
- Enable comparison across sector
- Quality standards "should be driven by beneficiary voice". BOND members recognize that quality is strongly linked to the quality of their relationships with beneficiaries (meaningful participation and ongoing dialogue) and other stakeholders (internal, external).

Furthermore, evaluations can improve the media's and general publics' perception of NGOs:

¹¹⁴ Organisational learning is facilitated by evaluations with questions and qualitative standards. Organisational learning is possible when standards are enforced through peer reviews, qualitative and values-based models of accreditation, self-control from the sector¹¹⁴, or self-assessment by NGO staff themselves.

- Evaluations can prove NGOs are trustworthy and give them a good image. It's in their interest if evaluations can prove they are transparent and accountable.
- Evaluations can be used to reaffirm the respect of humanitarian principles and uphold NGOs' values in reaction to the proliferation of NGOs and their interpretations of these principles. External control of compliance is in the interest of NGOs which meet quality expectations, because it would reduce the risk of NGOs funded by private sources tarnishing the credibility of the entire sector.

Evaluations can enable NGOs to regain legitimacy in reaction to increasing criticism (e.g. lack of downward accountability and coordination, confusion with military).

Hypothesis

Hypothesis 1: Although NGOs are theoretically held accountable to all three stakeholders in evaluations against standards, their compliance with standards tends to reflect their donors' expectations to the detriment of other stakeholders' priorities.

- **Sub-hypothesis 1:** Donors and NGOs have an asymmetrical relationship (given that donors can choose to re-conduct or allocate funds for certain NGOs rather others), so NGOs tend to adapt their conduct and priorities to the interests of donors rather than to those of other stakeholders¹¹⁵.

Accountability to beneficiaries is a key component of quality for NGOs.¹¹⁶ But during focus groups, interviewers found that while larger NGOs see accountability to beneficiaries as a means to improve their market share (reputation, access to funding), smaller NGOs don't necessarily have the capacity to ensure meaningful participation. So for larger NGOs, accountability to beneficiaries is not only a moral obligation, but also a means to obtain more funding from donors, whereas smaller NGOs aren't capable of ensuring accountability to beneficiaries.

Beneficiaries don't wield the same influence over NGOs than donors do. When comparing the humanitarian sector to the market sector, this imbalance between donors' and beneficiaries' influence over NGOs becomes clear. Indeed, clients in the market sector have a great deal of information on the products sold, they can compare such products, and put them in competition. This ensures power relations relatively balanced between clients and for-profit companies. On the contrary, beneficiaries of humanitarian aid don't have any power over the aid provided, given their precarious situation. The power relations between NGOs and beneficiaries are unbalanced.¹¹⁷

On the other hand, donors were identified as the main driver for adopting quality standards by 82% of BOND members.¹¹⁸ Quality of NGO work has often been evaluated according to accountability to donors more than to beneficiaries¹¹⁹, and mechanisms often focus on accountability to donors or governments¹²⁰.

- **Sub-hypothesis 2:** Evaluations are often commissioned by donors, so NGOs tend to adapt their evaluations to their expectations, in order to increase their chances of receiving more funding in the future.

¹¹⁵ Shamina Ahmed, David M. Potter, *NGOs in International Politics*, Bloomfield: Kumarian Press, 2006, 285p.

¹¹⁶ Keystone and Accountability, *op. cit.*

¹¹⁷ Groupe URD, "Issues at stake", *COMPAS Dynamique*, 2011

¹¹⁸ Keystone and Accountability, *op. cit.*

¹¹⁹ Marc-Antoine Pérouse de Montclos, *op. cit.*

¹²⁰ Ebrahim, A. 2003 'Accountability in practice: mechanisms for NGOs', *World Development* 31(5): 813–829

Evaluations are intended to highlight both the successes and challenges experienced by NGOs, but tensions between reporting/accounting to donors and organisational learning functions of evaluations creates a dual pull for NGOs.¹²¹ Indeed, if funding is influenced by NGO's previous achievements, there are clear incentives to emphasise successes and minimise failures – thereby impeding organisational learning. So short-term contracting of NGOs leads to agency problems in evaluations: most projects are renewed after an initial evaluation, giving contractor-agents little incentive to report failing or inappropriate projects.¹²² If contractor-agents were to be entirely truthful about implementation problems, they might hurt their chances of contract renewal and threaten their own organizational survival. Two other institutional features can exacerbate these agency problems: competitive bidding and multiple principles.

- **Sub-hypothesis 3:** When monitoring and evaluation units lack the resources for carrying out both reporting and learning functions, NGOs tend to focus on reporting requirements which are mandatory.

Although organisational learning is often highlighted as essential in evaluations from NGOs' points of view, learning is either separated from reporting functions in larger NGOs (because both aspects are separated in evaluations), or no resources are available for learning in smaller NGOs. Thus, when resources are limited, NGOs tend to focus on reporting requirements rather than organisational learning.

Empirical expectations of hypothesis 1: Given that NGOs adapt their use of standards to their donors' expectations, evaluations have focused on technical approaches (rather than strategic ones), accountability to donors (rather than organisational learning), performance management, results rather than processes, improvement of governance, service-delivery, management, transparency, effectiveness, functioning of mechanisms.

Quality evaluations have led to the improvement of service-delivery, governance, management, transparency and effectiveness of NGOs. There has been a trend towards more reductionist results focused on performance management and centralised management process.

Because of the difficulties that exist in satisfaction enquiries (actions not visible, beneficiaries are in a situation of despair) and because donors' requirements don't push for satisfaction enquiries, evaluations tend to focus on the functioning of mechanisms and are based on interviews with donors and operators.

Furthermore, quality of NGO work is often viewed as a technical issue, rather than linked to their mission or values. BOND members oppose technical approaches to quality evaluations (implementation of standards, service delivery) and strategic ones (relationships which ensure accountability, what, why, and with whom aid is delivered). Only strategic approaches ensure NGOs will deliver quality work (i.e. progressive social change). Technical approaches may not be enough to address more strategic concerns of addressing rights of beneficiaries, on the outcomes of assistance (including beneficiaries' view of that assistance).

¹²¹ Christina Laybourn, *op. cit.*

¹²² Alexander Cooley, *op. cit.*

Hypothesis 2: However, since NGOs have a certain level of autonomy, they may employ various strategies in order to pursue their own interests. Given the lack of resources and time they dispose of for quality evaluations, NGOs may also comply superficially with standards.

Justification of the use of the principal-agent framework

Relations between donors, contractors and recipients have been modelled by certain authors as a set of “principal-agent” problems wherein the donor is a “principal” and contractors are “agents”.¹²³ Delegation in the principal-agent theory of Hawkins and Jacoby is defined as “conditional grant of authority from a principal to an agent that empowers the later to act on behalf of the former”¹²⁴. Principals grant conditional authority and design institutions to control possible opportunism by agents; principals delegate because the agent is specialised, has the necessary resources (e.g. time, expertise, political capacity, knowledge, etc.), and because the projects they implement are repetitive, frequent, and need such resources.¹²⁵

But given that NGO’s authority doesn’t necessarily come from donors, and that donors cannot revoke NGOs’ authority once the contract has been agreed upon, their relationship is not a ‘classic’ principal-agent one. However, donors do have the power of deciding whether or not to fund NGOs, and they establish control mechanisms such as reporting requirements to verify that NGOs comply with their expectations. In this sense, the mechanisms specified in the principal-agent framework of Hawkins and Jacoby may apply to the relationship between donors and NGOs.

- **Sub-hypothesis 1:** NGOs will hide certain information from donors in order to pursue their own interests or those of other stakeholders.

As in all principal-agent relationships, principals face the problem of hidden information and action by the agent which serves its own interests or promotes its own goals. Indeed, “specialisation” of the agent implies that the agent can hide information from the principal.¹²⁶ This is especially true in remote locations, where contractors acquire specialized information typically unavailable to the donor.¹²⁷ So although evaluations financed by donors have a more critical distance than auto-evaluations undertaken by NGOs, donors don’t have access to sensible information that operators hide.¹²⁸

- **Sub-hypothesis 2:** If NGOs lack time and resources for monitoring and evaluations, they may carry out superficial evaluations.

¹²³ Alexander Cooley, James Ron, “The NGO Scramble: Organizational insecurity and the Political Economy of Transnational Action”, *International Security*, Vol. 27, n°1, 2002, pp. 5-39

¹²⁴ Darren G. Hawkins, David A. Lake, Daniel L. Nielson, Michael J. Tierney et al., *Delegation and agency in international organizations*, New York: Cambridge University Press, 2006, p. 7

¹²⁵ Darren G. Hawkins, *op. cit.*

¹²⁶ Darren G. Hawkins et al., *op. cit.*

¹²⁷ Alexander Cooley, *op. cit.*

¹²⁸ Marc-Antoine Pérouse de Montclos, *op. cit.*

Short-term funding cycles and pressures to keep operating costs down stifle long-term reflective evaluations. The principle reasons for poor quality evaluations include difficulties in gathering reliable data and information, lack of critical analysis and contextualisation, insufficient time or resources, and inexperienced evaluators.¹²⁹ NGOs often explain that they lack resources to conduct sufficiently in-depth evaluations.¹³⁰ NGOs argue that evaluation requirements of donors are inappropriately burdensome, and often not proportional to the size of the NGO or the funds allocated. Furthermore, the workload is compounded by donors asking for different information in their evaluations. It has been suggested that it would be more efficient for donors to agree on a universal set of requirements for all evaluations by NGOs.

- **Sub-hypothesis 3:** NGO staff accommodate standards on the field in order to ensure effective quality of their work (for example, the use interpersonal relations to ensure efficacy of projects) or to promote interests of stakeholders other than the principal, despite the principals control mechanisms (in this case, quality evaluations).

This accommodation can be done through various strategies specified in the principal-agent theory of Hawkins and Jacoby.¹³¹

- “*Autonomy*” is composed of all independent actions possible after the principal has established control mechanisms. “*Discretion*” refers to the case when objectives are defined in the contract, but not the specific actions the agent must implement.
- “*Agency slack*” is any independent action of the agent, either through “shirking” (minimising efforts) or through the modification of the principal’s politics. Agency slack is possible only when the donor can’t control the agent perfectly.
- “*Buffering*” is when a NGO puts barriers to the principals’ control mechanisms, for example by creating organisational structures which are costly to control. There are two ways of doing so:
 - “*Dualism*”: creating internal dualism to show external actors what they want to see, while keeping discrete the aspects that they wouldn’t appreciate as much. This can happen if third-parties’ influence over the agent grows so much that it comes to be reflected in the agent’s structure. Dualism enables an agent to serve different constituencies, while increasing its autonomy.
 - “*Ceremonialism*”: superficial reporting of activities to satisfy those controlling without providing too much information.
- “*Increasing permeability*” is when agents make themselves more permeable to third parties. The permeability of an agent is defined as « *institutional features that allow non-principals to access an agent’s decision-making process* »¹³². Third parties may

¹²⁹ Jean Ellis, “*Monitoring and evaluation in the third sector: meeting accountability and learning needs*”, Paper presented at the 15th NCVO/VSSN Researching the Voluntary Sector Conference, 2009

¹³⁰ Rachna Sundararajan, “*Making a Difference: confidence and uncertainty in demonstrating impact*”, *InterAction’s Monday Developments* (June 2008), p.24

¹³¹ Darren G. Hawkins et al., *op. cit.*

¹³² Darren G. Hawkins, p. 208.

Agents are more likely to be responsive to third party demands when both have similar understandings of issues, preferences, norms, and professional commitment – like in the case of local membership-based organizations, or when these third parties have resources the agent needs to complete its mission.

influence agents through persuasion, by embarrassment, by providing information, and symbolically.

- “*Reinterpretation of rules or mandates*” by the agent can take place before delegation (agents adapt their interpretation of mandate in order to convince the principal that their preferences correspond) and after delegation by the principal (e.g. reinterpretation of reporting mechanisms, of monitoring requirements, of the agent’s competencies, etc.).

Empirical expectations of hypothesis 2: evaluation rhetoric, gap between standards in practice and on the field, hidden information when donors finance evaluations.

Auto-evaluations undertaken at the request of NGO lack independence and credibility¹³³:

1. They leave aside those who don’t accept to be examined
2. The analysis is biased and occults real problems
3. The evaluation is often limited to a formal and technocratic exercise
4. They don’t favour experience capitalisation and don’t incite to learn from error

When donors undertake evaluations, they don’t have access to sensible information NGOs have an interest in hiding.

The evaluation rhetoric

NGO staff have an instrumental use of procedures: evaluation methodologies are necessary for NGOs to justify the opening of a programme to institutional donors, but actions on the field are often different from the standards in place.¹³⁴ Such accommodation is necessary for efficacy of aid: decisions on the field depend on exchanges outside of strictly professional relationships (personal networks and interpersonal relationships often come into play). So expertise is more a rhetorical obligation than a definitive manner to evaluate a program.

Mechanistic implementation of quality evaluations

There is a gap between standards in theory and how they are implemented on the field. Standards don’t necessarily improve action on the field: their implementation can be solely mechanistic, they may be ineffective or stifle creativity and improvisation.

Superficial participation of beneficiaries

Furthermore, there is a gap between accountability to beneficiaries and standards in theory and how they are applied on the field. Participation of beneficiaries (which is theoretically promoted in standards) encounters four problems on the field: there is no scaling-up of experiences at the local level, there is a lack of adaptation of participation from development to humanitarian sectors, a lack of involvement of beneficiaries in strategic decision-making and governance, and bad practices persist.

¹³³ Marc-Antoine Pérouse de Montclos, *op. cit.*

¹³⁴ Pascal Dauvin, *op. cit.*

ELEMENTS DE LA LITTERATURE QUE JE N'AI PAS SU REPLACER DANS MON CADRE THEORIQUE

A) Interests of each stakeholder in the enforcement of quality evaluations

1. Donors' interests

Standards can help donors to allocate resources, especially those who work with many implementing partners because donors lack the capacity and resources for field-level monitoring of NGOs:

- Formal and legalistic models of accreditation renders selection of NGOs easier.
- Certification would also help donors to allocate funds.
- External assessments are credible and impartial, and are often demanded by donors when they allocate large amounts to NGOs. This method is more expensive than self or peer assessments, and so aren't in the interest of NGOs.

2. Policy makers' interests

Donor governments seek to improve NGO performance. They may also abuse standards to politically 'instrumentalize' aid.

Host governments have several interests in standards:

- **Professionalization** was demanded by host governments; they want NGO staff to be qualified.
- Host governments also want evaluations to ensure **impartiality** of NGOs, **coordination** with local authorities and communities, **transparency**, that aid **meets needs** of populations, and that evaluations be **accessible to national NGOs**.
- **Certification** can be a complementary assurance of NGO quality (lack resources and capacity to monitor NGOs themselves).
- However, it isn't in the interest of local markets if standards support imported goods, and governments don't want to see standards used as a means to bypass national laws.

3. NGOs' interests

Interests of NGOs in the use of standards:

- It isn't in the interest of NGOs for **standards** to be abused in a way that limits their independence (used for foreign policy, emphasis on technical rather than political or ethical aspects of aid).
- **Accreditation** is in the interests of NGOs which have the capacity to be accredited.
- **Certification** as a condition for access to funds wouldn't be in the interest of NGOs because it creates competition, especially innovative or new NGOs because it encourages conformity and favours well-established causes. Certification is too expensive for smaller NGOs. Certification is in the interest of national NGOs because it gives them more credibility.

B) Contextual factors which influence quality evaluations

Standards are established by organisations which have an interest in improving humanitarian quality, and have the resources and capacity to develop them:

- Donors (e.g. DAC/OECD)
- Host countries (e.g. Philippines, Sudan, etc.)
- NGOs or coalitions of NGOs (e.g. IRCRC)
- Independent research organisations (e.g. Sphere, Groupe URD)

The manner in which evaluations are enforced require different conditions and have different consequences.

- Peer reviews are only possible when peers trust each other and aren't in competition for funding.
- Auto-evaluations lack independence and credibility. Evaluations financed by donors have a more critical distance but don't have access to sensible information that NGOs may hide. In order for an evaluation to be truly independent, it shouldn't be financed or undertaken at the request of NGOs or donors.
- Certification as a condition for access to funds creates competition between NGOs and encourages conformity, and favours well-established causes.

Principal-agent relations

Relations between contractors and project recipients are also characterized by agency problems. It is more difficult, however, to impute a priori a project recipient's preferences than it is those of a contractor. Recipients may genuinely welcome all project support and use aid resources for the purpose for which they were intended. But without proper monitoring, recipients may appropriate the contractor's resources for opportunistic gain.