Accountability in Public Interest

The last two years has been a particularly painful time for agencies who conduct humanitarian operations and has shone an intense spotlight on the need for these agencies to address issues of governance, accountability and safeguarding much more professionally. While agencies clearly see more urgent priorities at times of major disasters, they ignore these issues at their peril, and at the peril of those they aim to help: as well as aiming to do good, they need to avoid doing harm.

For NGOs who are widely seen as "saviours" of disaster-stricken people, this is a difficult lesson. But the giving public, journalists, funding institutions and even governments who are quick to praise those NGOs that are quick off the mark in bringing immediate help to those in need, are all fickle admirers.

While the story of "charities' magic" is one the world wants to hear when we are all still reeling from the news and images of disasters, very soon the thirst for new stories becomes evident, particularly amongst journalists. A fresh angle is often taken whereby there is a focus upon accounts of NGO bungling, supplying the wrong sort of aid or paying too much for it, slow delivery, spending too much on administration and other flaws that erode the benefits for those to be helped and in more recent times the flaws exposed have been of a more sinister nature.

A key turning point was the humanitarian programmes NGOs and the UN ran in response to the crisis of genocide and famine in Rwanda and the surrounding area in the late 90s, where it came to be recognised that a failing to consider political issues in the running of camps for displaced people unwittingly aided some of the militias who were perpetrating the killings. This led to much soul-searching on the part of the aid agencies and a commitment to rigorous procedures that guard against misguided disaster aid from then on.

More recently, more salacious episodes associated with humanitarian NGOs has come to the fore. On 9 February 2018, the front-page headline of the UK newspaper The Times read: 'Top Oxfam Staff Paid Haiti Survivors for Sex'. Since then, the British media has been peppered with accusations of sexual exploitation and harassment by staff of UK charities working in international aid, leading to DFID (UK’s official aid agency), the statutory oversight body (the Charity Commission) and a UK parliamentary committee all conducting investigations on what has been depicted as a failure of safeguarding in the sector. This has by no means been restricted to UK agencies, and the tsunami of concern about the issue has embraced agencies from many different countries, as well as UN agencies, in a tidal wave similar to that generated by the #MeToo movement.

For NGOs, the level of outrage can at times seem unfair and disproportionate to the problems exposed. If safeguarding processes have in the past been under-resourced, this may well owe greatly to the constant scrutiny about overhead expenses to which NGOs are exposed or the challenges of almost instantly assembling teams of perhaps hundreds of people in major relief operations.

Yet a change in culture and practice is needed. NGOs need to demonstrate their duty of care to the...
staff and communities they work with to prevent further harm. Taking measures to safeguard and adapting governance to truly integrate accountability practices into the everyday are now necessities and organisations and networks have been established to support and strengthen such integration of accountability practices into the civil society sector.

Over 240 agencies engaged in disaster response have developed and committed to the Core Humanitarian Standard – a 9-point charter of commitments to high standards of quality and accountability in humanitarian assistance. Similarly, a group of mostly large international NGOs have formed Accountable Now – a global platform that has developed a framework of commitments for high standards of civil society accountability. Comprising organisations working in environmental, development, human rights, anti-corruption and other fields, Accountable Now is supported by a Berlin-based secretariat and its Members submit regular reports to Accountable Now’s Independent Review Panel, of which I am Chair, to provide assurance that they are complying with the 12 Accountability Commitments or are taking meaningful action to do so.

As civil society organisations (CSOs) have come to assume greater prominence in many developing countries, several national CSO networks have sought to develop similar standards of accountability and governance as well as devise appropriate mechanisms to ensure these standards are upheld. Accountable Now has worked with these networks to develop the Global Standard for CSO Accountability.

A core ingredient both of Accountable Now and the Global Standard is promotion of the concept of *Dynamic Accountability* — a systemic approach to CSO accountability based on meaningful engagement with all stakeholder in an inclusive, participatory and ongoing mode of working, designed to ensure that CSO’s adapt to the needs of stakeholders. For agencies working in humanitarian operations this means, crucially, ensuring accountability to those stricken by disasters — who are inevitably at their most vulnerable.

What do accountability issues imply for NGOs who respond to disasters? To what extent are these changes in culture and practice occurring? At what levels can we find evidence of civil society adapting to these times of intense scrutiny and what can be done to facilitate this change further? This special issue of the journal provides a wealth of insights into these issues and practical information about to address them, particularly in the context of disaster response operations.

- **Jeremy Sandbrook** emphasises the very real risk of corruption arising in disaster-response operations, explains why this is all too likely, and sets out a realistic strategy for minimising these risks, in particular through strong community involvement. He draws many lessons from an actual (but unnamed) case study.
- **Erika Baranda** sets out how NGOs can and should involve their local partners and other local stakeholders in the accountability processes. She sets out the key elements of a dynamic accountability approach and the challenges entailed.
- **Kai Hopkins** delves into what should be expected of accountability mechanisms in situations of stark power-imbalance, as in disaster situations, in order to maximise resilience. The maxim she suggests should be: tell people what you are doing; listen to people; and enable people to influence decisions or have their views and concerns taken seriously.
- **Elodie Le Grand** goes further to explore how multi-stakeholder approaches to accountability can contribute to social innovation, as well as avoid problems, as the community representatives so engaged will bring their well-grounded ideas, as well as evidence relating to programme implementation, to the table.
- **Mukunda Upadhyay** and **Animesh Prakash** share an example of addressing governance challenges in a water management operation in the Mahakali River Basin. This programme shows the importance of taking cultural issues into account and using participatory as well as rights-based approaches; this lesson applies as much to advocacy as well as operations.
- **Ezgi Akarsu** underlines the importance of installing a well-structured feedback and complaints mechanism at the outset of operations. Such a mechanism should be easy to access, well-explained to potential users and open to all nature of complaints. Her article sets out the key features of such a mechanism.
- **Daniel Stevens** complements and adds to the above through drawing on his organisation’s experience in their Nepal earthquake response programme. Their highly-used feedback mechanism strongly improved beneficiary targeting, programme quality, problemsolving and trust-building and identified incidents of staff misconduct, including by their partners.
- **Jocelyn Condon** examines how transparency and accountability are addressed in the "Grand Bargain" — a framework for
improving humanitarian aid agreed amongst 50 donor countries and major aid organisations. While this included a commitment to using inclusive and participatory approaches, the experience over its first two years revealed that this is not usually the case in practice. A wide group of NGOs is now challenging the Bargain’s membership to live up to the rhetoric and use high standards of participation.

- The article by Isabelle Büchner emphasises that — due to the increasingly hostile stance of governments towards civil society in many countries — it is more important than ever for CSOs to truly commit to rigorous accountability, ensuring strong accountability to communities and other local stakeholders, not just to donors. She draws operational lessons from Accountable Now’s “Resilient Roots Initiative”.
- Hannah Wheatley assesses how the SDG Goal 16 (on inclusion, justice and institutional accountability) can be operationalised and the data needed if progress regarding to this goal is to be tracked in a meaningful way. She emphasises the involvement of communities and participatory research approaches for gathering this data and gives examples of this in practice.
- The final article by Esther Snithieram presents a case study of stakeholder engagement (or the lack of it) in the humanitarian response to the Rohingya refugee crisis in Bangladesh. While many problems follow from agencies’ failing to consult or work with the Rohingyas themselves, the article draws lessons from one NGO that put resilience and community engagement at the heart of their planning.

– John Clark, Accountable Now

COMMUNITY LED ACCOUNTABILITY

The Role of Community in Reducing Corruption Risk During a Disaster

When it comes to disaster response, no conversation is complete without a discussion of fraud and corruption. While corruption risk levels within humanitarian relief operations are directly impacted by its environmental context, the nature of the intervention itself (the complex system by which it is designed and delivered, the actors involved, and the type of disaster being responded to) is just as important. And it is through understanding the factors that undermine accountability when NGOs respond to such crises, that we can begin to identify possible risk mitigation strategies, such as community involvement.

What is it that makes disaster relief efforts so corruption prone?

So why are humanitarian relief interventions more corruption-prone than other types of interventions carried out by NGOs? The answer to this lies in the unique context in which they operate; with the speed of response a critical factor in the intervention’s success. In most cases, the level and focus of international attention given to disasters — particularly humanitarian ones — combined with an expectation that NGOs respond immediately, are key drivers behind this. The problem here is that this additional focus does not translate into increased scrutiny being placed on the intervention itself.

This need to respond as quickly as possible can result in a humanitarian intervention becoming schedule focused. Not only are NGOs forced to compete with other actors in sourcing relief items at reasonable prices before they are driven up by a lack of supply and/or speculators and hoarders moving into the market, but unrealistic expectations held by some donors also play a part. In this context, the speed of an NGOs relief operations on the ground are unable to match the pace of its fundraising machine (now seen by many NGOs as a means of tapping into new donors). This, coupled with pressures, (usually exerted by larger institutional donors) for NGOs to spend and account for funds as quickly as possible — regardless of the complexities on the ground — further fuels a focus on schedule (speed) over quality (planning). If this happens, accountability quickly becomes secondary to the actual crises itself.

As the intervention’s primary task is to source and deliver relief items as quickly as possible, the risk of corruption is increased. Not only is less time spent on ensuring the intervention is appropriately designed, but the need for speed can result in staff viewing standard checks and balances (such as those built into the procurement process) as impediments to the project’s overall success. The more it...
becomes schedule-driven, the more likely it will be that standard financial and operating controls, put in place for normal operations, are reduced and/or bypassed altogether.

In such cases, facilitation payments (or other forms of minor corruption) needed before a permit is issued, or essential relief items are cleared by customs, can become the norm. In such instances, the behaviour of staff is rationalised by arguing that the 'good' of ensuring that much needed relief items are delivered to beneficiaries as quickly as possible, outweighs the 'wrong' associated with making such payments regardless of the fact that the action is in fact corrupt.

**Case study of fraud in a disaster relief project**

The following case study of a fraud scheme within an actual humanitarian relief operation (HRO) undertaken by a large NGO highlights a number of factors raised above. Audited three times via two external financial and an external project audit and included as part of a broader capacity audit (which found that the project was "well planned and executed"), no irregularities were identified, with the project auditors verifying that all relief items had been physically distributed to beneficiaries.

The reality, however, proved very different, with a forensic audit carried out six months after the project ended, finding that in excess of $172,000 had been stolen by project staff. Staff had not only bypassed financial and operational processes and procedures which enabled contracts to be awarded to companies owned by them, but one in three beneficiaries didn't actually exist. Additionally, those beneficiaries who had in fact received relief items were coerced into confirming that they had received their full eight months' worth of relief items, even though most had not. Part of the scheme's overall 'success' can be attributed to collusion between staff members at different levels within the organisation, enabling them to maintain (or at least influence) end-to-end control over the whole of the HRO.

The fraud scheme's design and architecture have been outlined in **Figure 1**, which maps the various (corruption) elements used, against the HRO's various project phases.

The key question in all of this is: *could the fraud scheme have been prevented, and if so how?* The answer lies in analysing what element was
missing from the HRO’s overall design – involvement of the local community/beneficiaries.

**The missing link – Community Involvement**

As is the case with most NGOs, the project relied on three key accountability mechanisms: its existing internal control system, competent and trustworthy staff, and an independent external audit. Detecting just 4% of frauds external audits play little value in reducing corruption risk. While the project staff were indeed competent, they were not trustworthy, and colluded to by-pass and undermine the NGO's internal control system thereby enabling them to defraud the organisation. The question here is would a higher level of community involvement have changed the outcome?

Apart from receiving some of the relief items owed (Phase 6 in Figure 1), beneficiaries (and the broader community) had not been involved in the project planning (see Phase 1 and 4 in Figure 1). In addition, they were never informed of its overall duration or the quantity (or type) of items that were to be distributed to each individual every month. This negated the possibility of them voicing concerns, cutting the NGO off from an essential (external) accountability mechanism.

As an external accountability mechanism, community involvement is essential to reducing an HRO’s corruption risk. The more resilient a community is, the more able they are to actively engage with an NGO, and by doing so increase overall accountability. To be successful though requires three components: active participation, the provision of information, and a feedback and complaints mechanism. A proactive process combining all three will not only empower a community but increase accountability by ensuring that: the real needs are properly identified (the planning phase); there is awareness of what quantity and type of relief items are to be distributed, and who they are to be distributed to (the distribution phase); beneficiaries and communities have the ability to raise concerns should they feel irregularities may be taking place.

Had appropriate mechanisms been put in place for each of the elements outlined above, beneficiaries and the community (as a whole) would not only have known what their individual entitlements were but have had the means to alert the NGO of any concerns or irregularities associated with the HRO. While it may not have been enough to prevent this particular fraud, it would have significantly reduced the risk of it happening by acting as a key external accountability mechanism.

– Jeremy Sandbrook,
CEO Integritas360

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**FIGURE 1: CASE STUDY – MAPPING of DISASTER RELIEF PROJECT FRAUD SCHEME**

<table>
<thead>
<tr>
<th>Project Phase / Assistance Process</th>
<th>Corrupt Element</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phase 1 – Initial assessment and programme design</td>
<td>Element 1 Exaggeration of ‘real’ needs of potential beneficiaries on the ground</td>
</tr>
<tr>
<td>Phase 2 – Fundraising / Allocation of funding</td>
<td>Element 2 Staff collusion and use of patrimonial networks / Recruitment of ‘like minded’ temporary HRO staff (by-passing normal recruitment channels)</td>
</tr>
<tr>
<td>Phase 3 – Establishment / Scale up of operations</td>
<td>Element 3 Circumvention of internal controls / collusion / Contracts awarded to front-companies owned by staff / Falsification of PO notes / Short delivery or theft of $172,073</td>
</tr>
<tr>
<td>Phase 4 – Targeting and Registration of specific beneficiaries</td>
<td>Element 4 Presence of ‘ghost’ beneficiaries: 1,572 families benefiting vs. 2,200 being</td>
</tr>
<tr>
<td>Phase 5 – Procurement and Logistics</td>
<td>Element 5 Coercion and intimidation of beneficiaries / Fraudulent signing of distribution sheets / Reports falsified / Sale of relief goods to staff members at discounted prices</td>
</tr>
<tr>
<td>Phase 6 – Implementation and distribution</td>
<td>Element 6 Reports delayed and information falsified and manipulated / Queries raised where deflected as being an issue of ‘lack of trust’</td>
</tr>
</tbody>
</table>

NEW PARADIGM OF ACCOUNTABILITY

Dynamic Accountability, A Stakeholder-driven Approach to Accountability

When CSOs are imbued with the trust of people and organisations to pursue shared objectives and expectations, accountability of CSOs becomes a necessary foundation to sustain and legitimise this trust.

However, in the current context of civic space, which it is eroding all over the world, exacerbated by the failings of CSOs themselves, a lot of questions have been raised against the trust and accountability of CSOs. This leads to a call to reconsider how CSOs are practising accountability, addressing power dynamics and advocating for systemic change.

Previous efforts to regain trust through accountability

There have been several efforts from CSOs to regain the trust of people and organisations but so far, they have not been enough. CSOs have traditionally been accountable to donors and governments through upward accountability mechanisms such as fiscal and legal requirements. However, this kind of accountability prioritises the demands of donors and government over those of the people they work for and with. In response to this, many CSOs have begun to focus on redressing power imbalances to become more downwardly accountable. Yet these new efforts run the risk of not fully acknowledging the power dynamics outside and within CSOs, preventing CSOs from generating lasting change and trust of the people is yet to be fully regained.

Dynamic Accountability as a systemic approach to accountability

Built on previous efforts, several CSOs have been promoting a new approach to accountability that acknowledges existing power dynamics and aims to shift them towards benefitting their wide range of stakeholders. Restless Development was the first to name it: Dynamic Accountability.

Dynamic Accountability is a systemic approach to CSO accountability that is grounded in processes of meaningful engagement with all stakeholders that is inclusive, participatory and continuously practised.

It is about creating a transformational relationship between all stakeholders and CSOs where a more horizontal and mutual standard of accountability is established. By acknowledging its accountability to a diversity of stakeholders, CSOs can develop different relationships with each one of them, have a better grasp of how power dynamics change through time and become more adaptive to enhance impact and trust. But what does this process actually entail?

A broader understanding of the stakeholders

Similar to downward accountability, Dynamic Accountability focusses on redressing the power imbalances. However, it goes a step beyond: it considers a broader set of stakeholders from both inside and outside of the organisation. If the staff of an organisation does not feel their input is considered in the decision-making process, they will perceive little value in being engaged or accountable to partners and the people they work for and with. Understanding the interplay between stakeholders internally (board members, management, staff, and volunteers) and externally (donors, government, partners and people), the organisation can provide a comprehensive perspective on how accountability can become a lever for change.

Meaningful engagement as an organisation-wide practice

Dynamic Accountability incorporates meaningful stakeholder engagement throughout the organisation. By practising this, CSOs not only engage...
with their stakeholders by including their voices in decision-making processes but together they also establish how it can be meaningful for both sides. Meaningful stakeholder engagement can be understood as:

- **Transparency and openness:** The information on the work of CSOs is shared with stakeholders in a way that can be easily understood. It is easily accessible and feedback can be provided so as to hold the CSO to account.

- **Active listening and responsive decision-making:** CSOs actively seek to listen to stakeholders and are open to constructive criticism. Decisions are made to reflect this criticism and conversations are had with stakeholders to make them aware of changes.

- **Meaningful participation at all levels:** Stakeholders have an active role in different areas and levels of the organisation, such as at the programme, advocacy and strategy levels. They exercise varying degrees of influence in different areas.

- **Continuous dialogue and building relationships:** CSOs engage in an on-going dialogue and relationship with stakeholders as a means to establish shared goals and expectations.

- **Reflective learning:** CSOs constantly reflect and draw lessons on how to improve engagement with stakeholders, how this will affect work and how fundamental change can continue to be advocated for.

### Practising Dynamic Accountability

Incorporating Dynamic Accountability throughout CSOs means any organisational transformation will take time and effort. Yet the rewards make it worth it: CSOs will have the potential to be more responsive, adaptive, resilient and impactful. Going beyond the project level and incorporating Dynamic Accountability into a CSO’s daily work will require the ownership from management, staff, and volunteers in all areas.

The practical implications of fully adopting Dynamic Accountability are yet to be fully understood, but there are some foreseeable changes within the organisations. For example:

- CSOs would need to invest more resources in communication to ensure effective transparency and openness.
- At the programmatic level, CSOs would become more adaptive and would have to adjust their objectives, activities, and budgets to clearly address stakeholder needs.
- By including the voices of different stakeholders, at the strategic level, CSOs would become better at setting long-term, strategic goals.
- Staff and volunteers need to be trained and therefore empowered to meaningfully engage with stakeholders at different levels.

The organisational changes needed should be built on current practices, with the aim of mainstreaming Dynamic Accountability beyond the project level. By practising Dynamic Accountability, CSOs become more responsive and effective by understanding better how their work affects other stakeholders. This strengthens resilience by nurturing partnerships with different stakeholders, and it builds trust by establishing an adaptive set of shared goals and expectations between CSOs and their stakeholders.

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- *Erika Baranda*, Accountable Now
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ccountability is a word that gets bandied around a lot, but what does it really mean? There are many definitions but accountability is sometimes presented as a trilogy: 1. giving account (telling people what you are doing); 2. taking account (listening to people); 3. being held to account (giving people a chance to influence decisions or have their views and concerns taken seriously).

This is all well and good, but in the context of unequal power relations there is a missing piece — how do these accountability processes result in change that is central to true accountability? Listening to people without any follow-up action may actually make matters worse and real accountability is about listening so you can help people leverage their own skills and expertise to solve the problems they face. This has been practised within development work for some years now and though this is not a revolutionary concept, it has begun to gain ground in the humanitarian space, demonstrating that there are a host of reasons why accountability has become not only the right thing to do but also the bright thing to do.

For now, let’s limit the value proposition to just one area; the relationship between being accountable — as defined by listening and acting upon feedback — with resilience. Why resilience? Well, resilience is actually what we are all trying to achieve — stronger communities able to address the challenges they face on their own. Ultimately, accountability contributes to the resilience of the organisation that does the listening and to the resilience of the people they aim to support — making it a real win-win.

Take, for example, the work of Keystone Accountability and Ground Truth Solutions: the former organisation with a focus on development, the latter on humanitarian emergencies and protracted crises. Keystone Accountability helps organisations use feedback to improve how they support people. They work in domestic non-profit settings, mainly in the US and UK, but predominately support development organisations globally. Ground Truth Solutions, which has adapted Keystone’s approach to leverage feedback from people affected by crisis is currently operational in many humanitarian emergencies and protracted crises around the world. Both organisations share similar principles and approaches, and each sets a strong example of how accountability strengthens organisations to withstand financial shocks, build strong partnerships and ensure effective programming: ultimately, contributing to heightened resilience.

By firstly looking at the organisational level, we can begin to understand how accountability and resilience are linked: if we, as CSOs, develop systematic means of listening to those we are trying to support, we can get a good sense of what the intended beneficiaries think of our work and the ways we are trying to help them. Moreover, it is a relatively cheap and straightforward — as this simple Feedback 101 guide outlines. Once you know how people view your services, you can use their perspective to do a better job. Organisations are only truly accountable if they use the views of those they are trying to help to shape what they deliver and how. In this sense, being accountable through listening systematically — regularly and repeatedly asking constituents about key aspects of our work — and adjusting to feedback ensures we are providing the most relevant services in the best way possible. For an organisation, knowing this, and being able to demonstrate it, is incredibly powerful. The outside world is always asking for evidence that we are meeting pressing needs, that we are delivering what people actually want, and that we are beginning to change their lives in the process. Feedback through accountability mechanisms is a great way to do that.

If we look at organisation ‘resilience’ as being able to secure funding, win contracts and establish effective partnerships in the long-term through relevant and quality service provision — then feedback clearly becomes a useful tool. At Keystone, two particular projects provide a clear example of the relationship between accountability and

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Resilience is a long-term game and its impossible to say what impact being accountable is going to have for these organisations. Early results suggest that the inclusion of primary constituent (i.e. those who organisations aim to assist) voice at both a strategic level (are these the type of issues we should be focusing on?) and at a programme level (are we making a difference through quality and relevant services?) are helping to furnish organisations with what they need in order to be: a). learning entities, maximising opportunities and their own performance in real time; and b) organisations that can demonstrate this commitment to agile responsiveness and iterative improvement to funders.

To illustrate further how accountability and resilience are inextricably linked, let us look at the intended beneficiaries in the context of humanitarian action. In the same way that true accountability must ensure there is a response to what people say, it must also recognise that neither humanitarian agencies nor affected people operate or live in a vacuum. Life existed before the humanitarian caravan rolled into town, and will do so long after it is gone. Moreover, local skills, experience, insight and knowledge often outweigh that of the humanitarian agencies and need to be involved for any programming to be really successful. This is where accountability – the process of listening and responding – plays a critical role because it provides the basis by which to incorporate the views of affected people so that aid can ultimately help people to help themselves. These views make it easier to understand the culture, the community dynamics, what has worked before, and what is needed now. Furthermore, it is through the on-going and systematic collection of these views that agencies can ensure they are responding to changing need and circumstances on a regular basis.

With an increasing focus on climate change and its impact upon communities, Ground Truth
Solutions (GTS) increasingly focuses on preparedness and pre-emptive adaption. Accountability plays a critical role in both the before and during phases — understanding and strengthening local climate trigger signals and ensuring all programmes understand what communities will need moving forward. By their nature, climate-related disasters recur, and agencies need to know that they are helping people prepare for, and effectively mitigate against possible future recurrences. Being accountable allows them to do this. To aid our assessment of how well we are contributing to resilience, GTS regularly asks communities about the extent to which programmes are helping people to support themselves in the future. Sadly, in many settings the scores are low, but that doesn't mean it shouldn't be an area of focus, and we should use this feedback to think through and, eventually change the way we operate. How much more effective might aid agencies be if all of them systematically tracked and responded to feedback on such questions? Moreover, might it add another layer of public accountability if agencies published the findings on their websites? After all, if we really want to contribute to people's lives, we must empower them beyond just the lifecycle of programmes.

Of course, all of this needs to be done properly and not just involve a chat to a local leader — communities are complicated, their nuances are deep and their needs vary. But without true accountability, without an active voice, not only will humanitarian agencies fail to support affected people today, but they cannot empower communities and contribute to their lives in the future.

With more protracted or 'chronic' crises, the distinction between humanitarian and development is often blurry, and actors from both sides must think about how their approaches contribute to life beyond direct service delivery. This is what 'resilience' at the community level means - how can people look after themselves and others in their community once humanitarians have moved on.

Accountability is not a silver bullet and there is plenty that can stand in the way of good intentions. Even if accountability is put into practice and done well, there are obstacles to how successful it can be. That said, the process of listening and responding properly can contribute to resilience at multiple levels. The trick is to figure out how to deliver accountability in your context.

– Kai Hopkins, Ground Truth Solutions

ACCOUNTABILITY FOR IMPACT

Accountability as a Trigger for Social Innovation

For civil society organisations, accountability implies being held responsible towards not only funders and donors on how money is spent but also for actions undertaken towards all stakeholders: beneficiaries, communities, partners (being governmental or implementing partners), as well as the environment. Accountability is more than audited reports, it implies a constant dialogue with a diverse range of stakeholders, including those typically excluded and marginalised.

When addressing social or environmental problems or challenges, civil society organisations need to move towards ensuring they consider the perceptions of communities on the root causes of problems they face and the potential solutions to resolve them. Improving and strengthening accountability mechanisms and processes within an organisation through diversifying stakeholders and including traditionally marginalised and excluded groups of individuals during implementation of a project or...
The traditional models of sustainability that are entirely built upon ecological and economic frameworks face severe challenges in securing the livelihood of people as they often do not address the perceived and community needs in general. Sustainable development can only be ensured if every day experiences of people are considered as an integral component of the natural ecosystem and to conceptualise this, we need to include our own way of life as a cardinal building block of sustainability. Thus, culture which is not only diverse but also ever-changing, needs recognition if governance is to achieve sustainable goals. In the context of Water Governance, this could be referred to as the recognition and mobilisation of the riparian way of life as the basis of formulation, management and execution of water-related policies.

Climate change increases the recurrence and intensity of natural hazards. As such, including the natural environment as a stakeholder is of the utmost importance especially as with it being a "silent" stakeholder: the environment is easily and often overlooked. However, by evaluating the potential environmental impacts of projects, devising ways of supplying goods and services, and modifying how we conduct operations in a more sustainable way requires new ideas, new ways of thinking. This requires constant improvement, therefore innovation. By consolidating accountability, organisations open the door to innovative and creative efforts to reduce emissions, resources needed and pollution: by strengthening accountability within one organisation, consulting employees, volunteers and suppliers, the organisation’s capacities for risk reduction and adaptation are heightened.

It is through taking the time to consider all stakeholders, engaging, discussing, questioning and listening, that impact seekers are actually implementing accountability first hand. As such, by engaging your organisation in a path towards better accountability to a variety of stakeholders, you can unleash potential for real change and trigger a new way of finding solutions to contemporary problems: social innovation on disaster risk reduction and increased resilience.

– Elodie Le Grand, President and CEO of Consentia, Social Responsibility Inc.

**ACCOUNTABILITY AND TRANSBOUNDARY EWS**

**Understanding Cultural Sustainability in the Context of Transboundary Water Governance**

The Case of the Mahakali River Basin

The traditional models of sustainability that are entirely built upon ecological and economic frameworks face severe challenges in securing the livelihood of people as they often do not address the perceived and community needs in general. Sustainable development can only be ensured if every day experiences of people are considered as an integral component of the natural ecosystem and to conceptualise this, we need to include our own way of life as a cardinal building block of sustainability. Thus, culture which is not only diverse but also ever-changing, needs recognition if governance is to achieve sustainable goals. In the context of Water Governance, this could be referred to as the recognition and mobilisation of the riparian way of life as the basis of formulation, management and execution of water-related policies.

The revolutionary action plan of the United Nations, Agenda 21¹, speaks of community participation and local

governance in ensuring sustainable development. It is a breakthrough approach for redefining modern sustainable development governance. In Chapter 18 of Agenda 21, the significance of transboundary water resources is being emphasised strongly with special focus on the mobilisation of riparian resources and the need for an effective coordination between the states in the areas of Integrated Water Resources Development and Management, Water Resource Assessment, sanitation and drinking water, impacts of climate change on water and protection of aquatic ecosystems. It also acknowledges the significant importance of various indigenous practices and cultural knowledge in the sustainable development framework and gradual incorporation of environmentally-friendly technologies in the national and sub-national culture.

**Transparency in Transboundary Water Governance: Role of Culture**

Transparency in the flow of information is one of the basic pillars on which comprehensive water governance stands. In the transboundary context, it requires the participation of communities united through a process of dialogue. Culture has a significant role to play in this as transparency requires a continuous community-to-community dialogue through proper networks and support from the civil society sector. In this regard, it is very important to understand that sustainability of cultural values is not only pertinent in sensitizing the community on some critical issues but that it is also cardinal in advocacy strategies. In the context of water availability, early warning systems and water quality, such transparency helps transboundary communities share common water resources in a non-discriminative and democratic manner. People’s general sense of civic space has a tremendous potential to ensure transparency and strengthen the mechanism of accountability in the context of Water Governance. This sense of civic space that riparian communities have been preserving through traditions and customs should be used as a guiding path in helping governments and civil society formulate better policies related to transboundary water rights.

Countries which share the same river often share similar cultures and take part in related economic, social and cultural activities. A classic example of this can be observed in the context of the Mahakali River which flows through India and Nepal. The river is present in popular cultural traditions in both countries and even its origin and hydrological characteristics has been associated with myths and stories that are shared by communities on both sides of the border. Additionally, communities on both sides are engaged in shared economic and livelihood pursuits: in some cases, crop seeds are brought from one side of the border and then sown in another. Connections between neighbouring communities often transcend the economy and enter the personal and family life through marriage: the everyday life in the border of Banbasa and Tanakpur in Uttarakhand enjoys easy movement and flow of information especially in those areas where livelihood and marriage surpass administrative limitations. Culture here unites community and nourishes dialogue on various issues of common interest, among which, water-related issues are of pertinent importance.

Where there are no cultural exchanges in the basin however, flow of information particularly on water governance is often clouded and mixed with myths on the nature of the river Mahakali and the challenges the basin faces in general. This creates a challenge in ensuring transparency and accountability as far as the flow of information and dialogue is concerned. Thus, amidst the promising sustainable spaces facilitated by cultural harmony, grey spaces are created which have been hindering the scope of effective water governance by concerned stakeholders. That is why a comprehensive cultural sustainability framework which can enable flawless transparency on information related to early warning systems, water availability and water quality is important for ensuring stability and sustainability. Oxfam India and its partners have high regards for cultural values and
through its regional programme Transboundary Rivers of South Asia (TROSA), it has been trying to play the role of a facilitator in ensuring continuous community-to-community dialogue so that culture can truly be a pillar for effective transboundary water governance.

What is Accountability and Responsibility in the context of Transboundary River Governance?

Whoever is using water in any form is accountable for it irrespective of political, socio-economic, legal or administrative status. A farmer growing crops in the field is as accountable as a factory owner who is using the crops to prepare agricultural based products for communities that consume those products. Water either from the surface or from the ground is used directly or indirectly in many ways and so it is the inherent responsibility of every citizen to ensure that the river eco-system is being conserved and protected. Thus, sovereign states, corporates, civil society and the community at large should join hands together to ensure that no human activity acts as a catalyst for destruction. Under the ambit of TROSA, such critical issues are being addressed through community sensitisation and advocacy so that policies emerge from the ground and reach to the policy table so that governance can become more effective and accountable.

Under TROSA, the Mahakali Advocacy is an intensive and comprehensive deductive exercise which emphasises the importance of culture as an important actor of transboundary water governance. It facilitates dialogue between transboundary cultures and it is exploring the visible and invisible nature of accountability in water governance to create a basis for engagement of the community in accountability processes. On the one hand, a community-to-community dialogue is being facilitated, whilst on the other, stakeholders like the government, private sector and the larger civil society are made aware of water stewardship.

This unique platform is one of the foundation pillars on which dialogues for formulating water-related dialogues for the welfare of the riparian communities are built. What is being limited by administrative borders is being eased by culture by developing positive narratives on the various basin related issues and concerns. This platform advocates for policy-level intervention in formulating cooperative community approaches in securing water rights of the transboundary riparian communities and thereby assisting the government and civil society in ensuring transformation through advocacy.

Citizen science and Cultural Sustainability

TROSA’s citizen-science approach provides the community with the tools to analyse water stewardship in its simplest form: connecting transboundary cultures. It is the science of the people, for the people and by the people wherein the community is given exposure to understand and check surface and groundwater quality in transboundary riparian areas. In this approach, transboundary communities are provided technical support to analyse the quality of water they are drinking by the use of scientific tools. This is carried out through community managed water quality data, generated through an extensive and continuous process of collection of real-time information from the surface and from the ground on important parameters like total dissolve solutes, pH, biological oxygen demand, among others.

This exercise, if done on a continuous basis, will provide communities an understanding of how to strengthen leadership for informed decision-making as well as help them connect to other stakeholders. Most importantly, this embraces the very basic principles of cultural sustainability for accountability wherein the community’s right to govern the river shall be realized through the use of friendly technology. TROSA endeavours to use citizen science as a tool to connect transboundary cultures to converge and come together. What happens upstream influences the riparian lives in the downstream and when cultures living across the basin are not connected, negative myths with its hydra-headed implications of cultural disharmony finds a visible entrance to community life. TROSA, through its advocacy mechanism, not only is diminishing such disharmony but also is connecting people with people, thereby ensuring riparian justice and freedom from hegemonic governance. Technology’s primary aim in this context is not to create highly sophisticated databases but rather to use the community’s sense of space for advocacy and policy level change.

Sustainable Development without the involvement of people in decision-making processes may prove to be a mere textual adventure. The very definition of sustainability implies inclusivity with pragmatic approaches and with the recognition of culture as a significant component in the sustainable development framework, communities have witnessed positive change. In the context of transboundary water governance, such approaches as TROSA and Makhali Advocacy could revolutionise the very mode of intervention to ensure a sustainable and democratic water resource management. ■

- Mukunda Upadhyay, Programme Manager and TROSA Lead, Oxfam India Humanitarian Hub, Oxfam India

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ACCOUNTABILITY FOR CSOs

Feedback and Complaints Mechanisms
Learnings from International Civil Society Organisations

Introduction
Our understanding of accountability has evolved over the years, from a static, transparency- and finance-focused compliance exercise towards a more dynamic approach focused on power shifts and stakeholder-driven work. This approach — referred to as Dynamic Accountability and explained in a previous article in this journal, ‘Dynamic Accountability, A Stakeholder-driven Approach to Accountability’ — is grounded in inclusive, participatory, and continuously practiced processes of meaningful engagement with all stakeholders. Key to this, and indeed the minimum requirement for Accountable Now’s members — 26 of the world’s leading international civil society organisations (CSOs) — is having in place an effective feedback and complaints mechanism.

Why is a feedback and complaints mechanism important?
With many CSOs putting their key stakeholders at the heart of their programming, strategy, and advocacy work, and an increasing focus on participation and dialogue, it is crucial to have strong feedback mechanisms in place. At the same time, in the wake of a number of scandals to hit the sector in recent years, there is increased external pressure to have appropriate mechanisms to submit complaints or report inappropriate behaviour or incidents.

For CIVICUS, "having well-designed and responsive mechanisms for handling external and internal feedback will improve the quality of [our] work, enhance trust and confidence of stakeholders, identify areas of work which need strengthening, and ensure that we learn from feedback".

The feedback and complaints mechanisms discussed in this article are general, organisation-wide mechanisms which allow for the provision of feedback at any time, relating to any issue. Other methods of collecting feedback, such as surveys, focus group discussions, or community meetings, which actively seek to include peoples' opinions and requests in specific decision-making processes or programmes, are beyond the scope of this article.

Feedback or complaint?
When discussing these mechanisms, it is important to define the difference between feedback and complaints. Feedback is any type of input about an organisation's work, positive or negative, and could include suggestions for improvement. Complaints are a subset of feedback, expressing dissatisfaction about an organisation's (and/or its staff members') work or actions.

Key features of a good feedback or complaints mechanism
What are the hallmarks of a good feedback or complaints mechanism? Several Accountable Now members have been discussing this question in a peer advice group, and there is broad agreement on a number of key elements.

Firstly, the mechanism should be underpinned by a policy which is clear and easy to read, and defines the kind of issues that can be raised, with reference to other relevant...
policies that the organisation can be held to account against such as their code of conduct or safeguarding policy. The organisation should also clarify what is not covered by the mechanism, e.g. objections to an organisation’s advocacy work because it does not align with the complainant's personal beliefs. The policy should include information about the process and timeline for dealing with submissions, including an avenue for appeal if the initial resolution process is not satisfactory. It should be publicly available, at a minimum easily locatable on the organisation’s website.

There should be a dedicated submission channel, separate to channels for general enquiries such as an info@ email address. Online submission should be possible at a minimum, either through a form on the organisation's website or via a dedicated email address. Where needed, offline mechanisms such as a feedback box, phone line, or in-person submission of feedback should be made available - this is particularly important where stakeholders do not have easy access to the internet or are not tech-savvy.

The mechanism should be accessible and appropriate for the user. In addition to offline submission of feedback and complaints, the mechanism should be available in languages spoken by key stakeholders and provisions should be made for certain groups, such as verbal submission for those who are illiterate or have difficulty writing, or child-friendly mechanisms which use simpler language.

What else do we need to consider?
Each of the above factors needs to be taken into account when designing a feedback or complaints mechanism. But often CSOs have more than just one mechanism. There may be separate policies and submission channels for internal and external stakeholders, and for different issues such as fraud and corruption or safeguarding. If this is the case, organisations must strive to explain clearly how their different policies and submission mechanisms interact, and users should be able to easily identify the channel they should be using. Some organisations simplify their processes by allowing all feedback and concerns to be submitted through a single mechanism.

Simply having a feedback mechanism in place may not be enough to prompt submissions. Or submissions may not reflect peoples' true thoughts — particularly in cultures where courtesy bias may lead to hesitancy to express negative feedback. It is therefore crucial to promote the mechanism broadly, explain what people stand to gain from providing their feedback, and be clear that complaints are welcomed. This may need to be done several times before it has the desired effect, but if people can see that an organisation welcomes all sorts of feedback — and will act to respond — they are more likely to voice their opinions.

Responding to and reporting on feedback and complaints
It is crucial that organisations are able to respond in a timely and meaningful manner to submissions. This means acknowledging receipt of feedback or a complaint, providing information about next steps, and informing people about the outcome - what has been done with their feedback, or in the case of complaints, what steps are being taken to respond to, rectify, and learn from the situation. People should also be given the chance to respond, to ensure that the organisation has understood them correctly and that the response to their feedback is in line with what the person envisaged. Even if the feedback or request received is beyond the scope of the organisation or cannot be implemented for some reason, this should be explained. If organisations are not able to respond meaningfully to the feedback they receive, the very trust they are trying to build through these mechanisms will be compromised.

A final consideration is how we communicate more broadly about the complaints we receive. The recent scandals in the sector have led to increased interest around the number of serious incident reports received by CSOs. While for the most part organisations do not release the number of complaints they receive, Accountable Now encourages CSOs to provide an overview of the number and broad nature of complaints and whether they were resolved. This top-level information is unlikely to endanger the privacy of those involved and is a good way to track the number and types of incidents over time. It is key to stress that a low number of reported incidents is not necessarily a positive — particularly in large organisations, it could indicate that the complaints mechanisms in place are not effective or fit for purpose.

Whilst it may be daunting to disclose the number of incident reports CSOs receive, we have seen that transparency, acknowledgement of challenges and failures, and most importantly demonstrating what has been learned and what changes have been implemented as a result, is the best course of action in the long term.

– Ezgi Akarsu, Accountable Now
This article briefly explores World Vision International Nepal's (WVIN) experience of the value of feedback and response systems in both enhancing the effectiveness of an international NGO response to the 2015 Nepal earthquakes, and then in the longer term to enable it and its partner NGOs to be more relevant and resilient in an era of decentralized governance.

WVIN began implementing long-term development programmes in 2001, including a number that were affected by earthquakes in April and May in 2015. With the widespread, detrimental impact these earthquakes had upon Nepal, WVIN expanded its operations, eventually reaching over half a million affected people with livelihoods, health, shelter and infrastructure through WASH, education, child protection and DRR programmes.

In line with World Vision's Programme Accountability Framework, WVIN's response and programmes incorporated 1) information provision, 2) consulting communities, 3) promoting participation and 4) collecting and acting on feedback and complaints. In an initial, real-time evaluation of World Vision's emergency response programme, conducted in July 2015, it was noted that out of all these accountability practices, building feedback and response systems was the most challenging and in particular ensuring a response to complaints was difficult given time constraints and limited experience of these kinds of systems by field staff. Steps were then taken to expand access to feedback and complaint mechanisms (such as the introduction of toll-free hotlines), which gave community members different options for providing feedback (face-to-face with staff, including at dedicated help-desks, suggestion boxes, or by e-mail or phone). Additionally, the recording of feedback and complaints became more systematic due to the use of an open-source data collection tool. Between October 2015 and September 2016, a total of 5,476 pieces of feedback were recorded from the earthquake response programming locations with the most common mechanisms used being help-desks that enabled face-to-face interaction with World Vision staff. Internal analysis suggested that responding to this feedback had better enabled World Vision to:

- Select the right beneficiaries for delivery of inputs and services
- Contribute to availability, quality and quantity of inputs (training materials, agro inputs)
- Increase the quality of activity and inputs and timeliness related to infrastructure construction work (including resolving the case of labourers not paid for WVIN funded construction work)
- Identifying where increased monitoring was needed
- Building trust and understanding of World Vision's role
- Highlighting staff misconduct (this primarily related to the conduct of implementing partners) and ensuring a timely response, in line with the Staff Code of Conduct and specific policies that build on that, such as the Child and Adult Safeguarding Policy.

Having seen the benefits of feedback and response systems in its earthquake response programming, WVIN decided to introduce similarly systematic systems across its wider, longer-term programming, starting with a few pilot locations. A study by the action research and advisory organization, CDA, in 2016 helped identify where there had been progress and where particular
attention needed to be paid. With the government requiring all international NGO programming to be implemented through local NGOs, one of their main observations of CDA was the challenge of ensuring that World Vision’s commitment to collecting and acting on feedback and complaints was operationalised by implementing partners.

After making it a requirement for all partners in World Vision programmes to systematically collect and act upon feedback and complaints, in late 2018 a follow-up, internal study was conducted to see the extent of progress made in this area. Results showed the requirement was fulfilled as a result of the inclusion of ‘responsiveness to feedback’ as a key partner performance indicator, with facilitation made by the use of a centralised feedback register that enabled tracking of responses and whether they were done in the agreed time period.

Interviews with two World Vision’s local partner NGOs revealed that initially responsiveness to feedback was perceived as a ‘compliance’ exercise and a relatively burdensome one as it required staff time to ensure each piece of feedback was responded to. Over time, however, they reported seeing the value, particularly in increasing trust levels in the community. Even if sometimes they had to communicate that responding to the feedback would be outside the scope of the programme, the very process of reporting back (and so being accountable) to the communities contributed to increased trust. One of the NGOs had taken the step of extending a feedback and response system into other projects funded by other donors, even if those donors were not requiring it. This then went beyond ‘compliance’ and suggested that they saw the intrinsic benefits of collecting and acting on feedback and complaints.

For the legitimacy of international and local NGOs is being questioned globally, and Nepal is no exception. As one commentator argued that there is a ‘lot to ponder’ around the activities of international NGOs: “Aid scattered in many smaller projects has caused fragmentation with high transaction costs and additional burden for both the government and development partners”.

Civil society, in all its complexity and diversity, may not be the most efficient way of implementing standardised development interventions. If local level civil society is to retain its relevance then it will need to play to its strengths, which are its ability to listen, understand and be responsive to the perspectives of those who are supposed to be the beneficiaries of development cooperation. Embracing the discipline of feedback and response systems will both increase the relevance, and effectiveness, of their projects and contribute to increasing the agency of marginalized groups. And international NGOs can contribute to those practices in a way that structures their partnership agreements, incentivizing responsiveness to feedback and working with local civil society in promoting the value of development with people at the centre.

Daniel Stevens, World Vision International

ACCOUNTABILITY FOR PARTICIPATION

Rethinking the Participation Revolution

The Grand Bargain, the Asia-Pacific Region and why CSO-driven Accountability is Key

Back in May 2016, the Grand Bargain was released. Signed by 18 donor countries and 16 major aid organisations, it set out an agreed set of commitments for more efficient, effective delivery of humanitarian aid that aims “to get more into the hands of people in need”1. Since this time, membership of the bargain has increased from 34 to more than 50. Two annual progress reports have been released and many roundtables, workshops, summits, standing committees, steering groups and infographics have resulted. The bargain details 10 workstreams under which 51 commitments sit. Among the most interesting and ambitious of the workstreams created under the bargain was workstream 6, which set out a plan for “a participation revolution”. The vision of workstream 6 was that, by the end of 2017, analysis and consideration of inputs from affected communities should form part of all humanitarian response plans2. Whilst undoubtedly a critical moment concerning the manner in which we conceive of and respond to humanitarian crises, it is perhaps both self-aware and somewhat telling that humanitarian actors needed to be reminded and recommit to the importance of placing the people we seek to serve at the centre of our work. Nonetheless, the commitment is admirable at face value. It speaks to the need to include affected peoples

1 https://www.agendaforhumanity.org/initiatives/3861
2 ICVA, "The grand bargain: everything you need to know". p.11
and communities in our decisions, ensure their participation and feedback is sought and that we are creating environments that foster trust, transparency and accountability. But how have these commitments brought about change for the people we support, and where are we going from here?

In the 2017 report, reporting under workstream 6 showed that we hadn’t done well: in June 2017 it was reported that less than half of members had invested in feedback mechanisms. Even less could show substantive progress against measures for coordinated approaches, communication or community engagement.

In 2018 we did better, sort of: the 2018 report noted that a lot more members had reported actions against workstream 6, resulting in a high number of activities to enhance policies, programs and staff training on accountability to affected populations. Yet, the report further noted that it was now not clear whether these actions had actually resulted in the transformation of accountability and participation we wish to see, and whether humanitarian programs were actually becoming more ‘demand-driven’ at all.

Understandably, it seems that the bulk of the activities undertaken in this workstream have focused their attention on activities that fall within their direct control, that is those that involve policy revision, technological enhancement, staff capacity and so on. However, one of the key commitments that is failing to be addressed in these activities is the stated commitment to ‘develop common standards and a coordinated approach for community engagement’ as well as ‘a common platform for sharing and analysing data to strengthen decision-making, transparency, accountability and limit duplication’.

Initially, it made perfect sense for the Grand Bargain to focus on the largest and most established actors of the humanitarian system to facilitate fast agreement on how to act on the crucial issues at hand. But presently it can be seen that the success of these commitments is in fact contingent on the action of governments, and NGOs. In fact, this was a specific finding of the 2017 report. The 2018 report notes that although many signatories report that they have participatory mechanisms in place, it is not clear that these are used consistently at the country-level.

The challenge at hand is thus two-fold. Any humanitarian emergency is by its very nature urgent and overwhelming. In the immediate face of such need, it is entirely defensible for organisations to ‘dive straight in’ - meaning well-meaning plans for affected population input instantly become a ‘nice to do’ rather than essential activity. Secondly, in this environment, it’s even more difficult to mount a convincing argument to dedicate time and resources into feedback and accountability mechanisms when they could be spent on other, more substantive and tangible forms of relief. The result, as the 2018 report notes, is that 80% of affected populations surveyed felt that their views were not being taken into account in the aid they received. This unfortunate reality means relief is misdirected, misunderstands the nature of the needs at hand, that funds could have been spent better and that ultimately, scarce resources have been wasted.

Whenever our organisations fail to place the people that they wish to benefit at the centre of the work they undertake, although surface level issues may appear to have been addressed, unhelpful power dynamics are consistently reinforced, the localisation agenda is undermined and a static, ‘tokenistic’ accountability is all we can hope to achieve. This is particularly relevant in South Asia and the Pacific, where the Australian Council for International Development (ACFID) and its network are often completely reliant on the permissions and support of local Government and local NGOs for the success of their

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Interventions, and yet often fail to recognise the criticality of local voices in the processes they design and undertake. This apparent failure to take a more dynamic approach to our accountability is undermining our capacity to be effective and preventing us from harnessing already scarce resources to their full capacity.

It is this need to address the urgent issue of genuine engagement with our stakeholders, and the ability to develop agile organisations that adapt and respond to these needs that drove the development of the Dynamic Accountability concept, and the Global Standard. The Global Standard is a new standard for Civil Society effectiveness developed by 9 project partners from around the globe. Constructed around 12 Commitments to transform accountability, it brings together key elements from a wide range of existing standards into one comprehensive and integrated document. Informed particularly by the Core Humanitarian Standard and the Istanbul Principles for CSO Development Effectiveness, the Global Standard complements these standards by integrating the Dynamic Accountability concept. With this approach comes a number of unique features that serve to both harmonise the disparities of existing standards, and increase its accessibility and relevance to achieve greater outcomes.

The Global Standard speaks to both the work of an international and a domestic civil society actor. This framing sets it apart from many existing humanitarian standards, which are framed around the implicit assumption that the implementing organisation is coming in from outside the country. By developing a common standard capable of speaking to both contexts, the Global Standard has established itself as both accessible and adaptable to address the challenges at hand. By driving accountability for our work, the Global Standard partnership has borne a standard that is accessible to any organisation and capacity level, and never fully attained. In practice, this means that a local NGO just starting out on its transparency, accountability and effectiveness journey can jump into the commitments in their own way, reframing the manner in which they conceive of a stakeholder. They could pick out one commitment and its key actions and begin their journey there.

Concurrently, an experienced and well-resourced NGO operating in multiple countries may be interrogating the accountability of their work by evaluating their organisation against each of the key actions the Global Standard sets, updating feedback mechanisms, and then seeking out peer-review of their self-assessment. The ‘dynamic’ part of the accountability tells us that both of these approaches are valid and that the accountability journey will constantly shift and change. Rather than compliance with the standards being the indicator of success, partners to the global standards seek out this truly dynamic state as the ultimate goal. In seeking to create a movement of organisations worldwide that foster a culture of accountability and people-driven work, the Global Standard has not prescribed one fixed way to adopt the standard. This means that any organisation in any country can start the accountability journey at the most suitable point. The point, in fact, is to get started.

The Global Standard has also been crafted to suit use as a reference Standard. This means it is not intended to replace existing standards currently used by various standard-managing organisations and their members around the world, but rather where a pre-existing standard is in place, the Global Standard can be used a reference point with which to align. In drafting the Global Standard, the partners worked to ensure it is applicable across different areas of work and acknowledges the needs of a breadth of organisations and contexts. In doing so, the Global Standard also purposefully strengthens common principles across existing accountability standards and codes, giving strength to the global movement for effective CSOs and dynamic accountability.

ACFID is a partner to the Global Standard. We believe that strong civil society is at the heart of powerful and effective action on the issues that affect our region most acutely, such as climate change, resilience and disaster risk reduction. And further, that through empowering the organisations that our members partner with in the Pacific and across Asia to improve, prove and demonstrate their effectiveness, our collective voice and action is strengthened too. Adopting the Global Standard at every level of a humanitarian response is key to delivering on the participation revolution sought through the Grand Bargain. In many cases, the missing piece of the puzzle is undertaking this foundation work at the local level that will have a lasting impact.

As humanitarian responses become increasingly protracted, the grey area between where humanitarian response ends and development begins also widens. In this context, the need for effective and prepared humanitarian actors at every level who are responsive to the needs and voices of affected populations as their highest priority has never been more important. The Global Standard offers an opportunity for organisations to map the journey, regardless of where that journey starts. The imperative is to begin it now.

– Jocelyn Condon, Australian Council for International Development (ACFID)
Achieving More Trust, Legitimacy and Resilience for Civil Society

What is Needed to Make Accountability Practices Work: Learnings from the Resilient Roots initiative

Recent times have seen an alarming rise of government, private sector and media measures that restrict and close spaces for civil society to do their work. Many government bodies have started to use a narrative that de-legitimizes (and even demonizes) CSOs, framing them as foreign agents that aim to undermine national sovereignty. Under the gaze of transparency and accountability, government officials argue for tighter regulation, requiring from foreign-funded organizations that they seek approval from official institutions, demanding income and asset declarations of CSO leaders and raising the bar for reporting obligations on internal accountability and governance.

However, the declining trust in CSOs does not only stem from the restrictive or manipulative government policies but is also due to the way CSOs most commonly practice accountability. The typical means through which CSOs demonstrate their accountability — such as compliance with regulatory requirements and donor reporting — are unlikely to be sufficient to convince sceptical voices. Many organisations have started to realize that their most important advocates are the people they aim to represent, or who are increasingly being called “primary constituents”. Building trust with this group can be essential when their work is under scrutiny. Having the backing of the people an organisation works for and letting them speak about why an organisation’s work is valuable to them can be a direct proof of the CSOs legitimacy to exist in this space.

The Resilient Roots initiative aims to test the following hypothesis: CSOs that are more accountable and responsive to their primary constituents are more resilient against threats to their civic space. In the realm of this initiative, 14 organisations from diverse countries and contexts roll out innovative accountability experiments over a 12-month period. These pilot projects explore how public support and trust in CSOs can be improved by practising accountability to their primary constituents. This means they aim to establish a meaningful dialogue with those groups that CSOs exist to support or represent and increase their engagement in CSO decision-making. They do that by establishing mechanisms that allow them to collect feedback on their work, their expectations and the challenges they face directly from their primary constituents. This feedback is used to drive organisational decision-making. But just implementing the feedback is not enough to build trust and be accountable. The Resilient Roots pilots establish a dialogue with their primary constituents by feeding back the information on what changes have or will be made and respond to any kind of feedback. Even if the feedback can't be implemented, they explain to their primary constituents why this is the case. This gives their primary constituents the chance to discuss with the organisation whether the response is sufficient to them and provide follow up feedback.

This article outlines some of the lessons learned half-way through this pilot phase about what primary constituent accountability means in practice and how to achieve increased trust and active engagement.

Creating awareness is the basis
When beginning their accountability pilot project, many of the participating organisations faced the problem that their primary constituents were not aware of what their organisation does or had misconceptions about it - which makes being accountable to them all the more difficult. This is especially a problem for advocacy organisations, where the primary constituents could consist of fractions of the whole population of a country without direct contact to them. The Poverty Reduction Forum Trust (PRFT), an organisation fighting poverty in Zimbabwe, faced this challenge in particular because their primary constituents are people living in rather rural areas all over Zimbabwe. Their approach to conquering this challenge was to put together a community advisory committee that raises awareness for

2 The initiative is coordinated by CIVICUS and funded by the Ford Foundation. Technical and strategic support is provided by Keystone Accountability and Accountable Now, along with our regional partner for Latin America, Instituto de Comunicación y Desarrollo (ICD). The two-year pilot phase will run until the end of 2019.
the organisations, clarifies misconceptions, and collects feedback within their own communities. In this way, they ensure that even the most remote and arguably “less involved” constituents of their organisation have a voice that is heard.

But for organisations providing services, this can be a problem if some of their primary constituents are not in direct contact with the organisation. For Projet Jeune Leader (PJL), a youth organisation running sexual and reproductive health education programmes in schools in Madagascar it was important to show their accountability to the parents of the young people they are working with. Many parents, however, especially the ones living in rather rural areas and with no direct contact with the school their children attend, were not aware that this programme existed. Their solution was to produce a printed newsletter that explained what PJL does. The students were asked to take the newsletter home to their parents and discuss with them what they are learning in school. The newsletter also has a blank page that the parents can use for feedback and the young people then bring it back to school.

**Continuous iteration is key**

When organisations start to engage their primary constituents through collection, implementation and responding to feedback, many organisations fall into the trap of making this a one-time exercise. Yet collecting feedback should be done in a way that allows for meaningful dialogue, builds meaningful relationships and in the long run trust between the CSO and its primary constituents. Early on in the Resilient Roots initiative, pilot organisations began asking themselves how they can integrate their accountability mechanisms of collecting and feeding back the actions that have or will be taken, in a continuous manner, even after the special funding from the Resilient Roots initiative has stopped.

With this, some mechanisms are more sustainable than others: CSOs should ask themselves what mechanism could be continuously practised, which will depend on many factors within the individual organisation. However, the initiative also calls on donors to understand the value of such mechanisms and allow for extra funding to be built into the budgets they provide for certain projects or programmes.

**Adapt to the context**

Primary constituents who are unwilling or unable to provide feedback to the organisation may be an indication that the CSO is currently not using an appropriate accountability mechanism. For the Resilient Roots pilots, it was extremely important to design their mechanism based on the context they are working in and the different constituents they are working with. For example, the women’s rights organisation FemPlatz from Serbia couldn’t conduct community meetings in some areas, because many would be afraid to attend such a public event. Discussing women’s rights is a sensitive topic for many of their primary constituents. Keeping that in mind they organised more informal meetings called “Coffee with a friend” at the house of one of the women they are working with and invited other women from the neighbourhood.

**Staff need to be on board**

Many organisations had difficulties to convince their staff about the necessity of this approach. Their staff members felt that it was too much of an effort on top of their already full schedules and felt uneasy about the danger of getting criticized for their work. Bringing staff on board and making them feel comfortable about getting feedback on their work can take time but it is essential for the success of such an approach. If feedback from primary constituents is collected, the staff need to feel comfortable to work with the suggestions they receive.

Another dimension of this challenge is the possible lack of knowledge and skills on how to collect, implement, and respond to feedback. Staff members need training on how to do this the right way. Opening oneself up to being criticised and maybe receiving feedback can be hard to respond to and staff members need to feel supported throughout this process.

Lastly what’s important is that accountability isn’t just practised on the outside. Organisations that have great practices of being accountable and establishing a continuous dialogue with their primary constituents but miss to do the same with their staff, won’t be successful in the long run. Trust needs to be established through accountability mechanisms inside and out.

**Looking forward**

Practising accountability to achieve immediate effects can be done in very simple ways. However, to truly achieve effective accountability that strengthens an organisation, CSOs shouldn’t stop there. Accountability is part of a process that needs to constantly adapt to the complexity of changing spaces around and within an organisation. To whom accountability is practised and how can look very different. From the experience of the Resilient Roots initiative, accountability works best when it is practised in a way that allows a CSO to build mutual relationships encouraging a close engagement from all of their different stakeholders. While CSOs should not forget the other stakeholders they need to be accountable to — especially the staff of an organisation who are responsible to implement the mechanisms —, organisations should not forget to always put primary constituents at the heart of their work and efforts.

– Isabelle Büchner, Accountable Now
In July 2019, countries will meet during the High-Level Political Forum (HLPF) to review progress on the Sustainable Development Goals (SDGs). 193 countries adopted the SDGs and the integrated agenda to end poverty, protect the planet and ensure that all people enjoy peace and prosperity. 230 indicators help track progress and whether countries are keeping their commitment towards the goals. There has been progress, but challenges remain, particularly on SDG16: Promote just, peaceful, and inclusive societies, with no data available for 12 of its 23 indicators. Civil society can help fill these data gaps and they are particularly useful to “raise the flag” when official sources of data miss or mask progress, violations or inequalities between groups, especially at the local level.

Because the SDGs have seventeen goals covering people, planet, prosperity, peace and partnerships, most civil society organisations are already working towards accomplishing the SDGs in some way and there is a vested interest in helping monitoring SDG progress. Yet despite these aligned interests, most organisation’s data cannot be used for SDG monitoring because their methodology or scope differs from the official SDG indicator methodology. For example, many of the SDG indicators ask for the proportion of the national population, which is typically a larger geographic area than most organisations operate. Despite these difficulties, civil society can contribute to the SDG dialogue and help hold decision-makers accountable to their commitment towards the goals. One example of this is the 2018 SPEAK! Campaign, which brought together 36 organisations in 22 countries to collect 581 responses to indicator SDG 16.7.2 regarding responsive, inclusive, participatory, and representative decision-making at all levels.

**SPEAK! for SDG16 Indicator Data**

SPEAK! is a campaign supported by CIVICUS that engages civil society to raise awareness, break down barriers and build global solidarity. The SPEAK! events in the different countries were diverse and addressed such issues as corruption, menstrual health, combating hate speech, perception of immigrant communities and interreligious marriages to mention a few. The SDG 16.7.2 indicator on inclusive and responsive decision-making was of interest to the diverse range of the organisations.

The official proposed questions to measure this indicator are the following two quantitative questions –

1) How confident are you in your own ability to participate in politics? (Select one)
   - Not at all confident
   - A little confident
   - Quite confident
   - Very confident
   - Completely confident

2) How much would you say the political system in [country] allows people like you to "have a say" in what the government does? (Select one)
   - A great deal
   - A lot
   - Some
   - Very little
   - Not at all

The first question measured an individual’s ability to participate, and the second question addressed whether the structural issues of being able to participate such as restrictions to holding decision-making positions or adequate ability to influence decision-making bodies. An additional nonofficial open-ended qualitative question was also asked to add context and potentially highlight positive inclusive decision-making practices and opportunities that could be expanded.

- Can you describe a place or time when you were able to influence decision-making in your community?

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3 https://www.togetherwespeak.org/
4 https://civicus.org/
The collected data followed official quantitative data methodology as well as complimentary qualitative data to contextualize the responses for each community and the responses were used to find regional trends. Furthermore, the experience using the proposed SDG16.7.2 indicator questions was provided to the UN Statistics Division/IAEG-SDGs for its consideration of moving the indicator from Tier III to Tier II status. Tier III status means that there is no agreed methodology for measurement are available. This is particularly problematic for SDG16 because 7 of its 23 indicators have been listed as Tier III. This status hinders the ability to collect and coordinate efforts to measure progress. The regional trends report has been submitted to the SDG16+ report and is currently being prepared for the United Nation's High-Level Political Forum for July 2019 where countries participate in a Voluntary National Review of indicators, which will include SDG16.

**Findings**

Despite the different contexts organisations were working in, the responses presented more similarities than differences. Most of the participants were confident in their own ability to participate in politics, but many also mentioned that their country allows little possibility to influence the political system. Still, the open-ended qualitative questions allowed us to see that many individuals found ways and spaces in their families and communities to influence decision-makers. Not all organisers participated and particularly in the Middle East and North Africa (MENA) region, the questions were considered "too political" to ask. Yet one organiser in Iraq who initially showed concern but went ahead with the questions reported being pleasantly surprised at the fruitful and enthusiastic nature of the discussions. This was the common report from the organisers that the questions were a way of opening up

**Background**

CIVICUS is a global alliance of civil society organisations and activists dedicated to strengthening citizen action and civil society throughout the world. It is an alliance of 7000+ members in 160 countries. CIVICUS advocates, convenes and publishes regular research on civil society. CIVICUS launched the DataShift initiative to build the capacity and confidence of civil society organisations to produce and use citizen-generated data. Citizen-generated data is data that people or their organisations produce to directly monitor, demand or drive change on issues that affect them. It is sharing experiences from this support to build capacity on citizen-generated data across the world and is seeking to inform and influence global policy processes on the Sustainable Development Goals (SDGs) and the data revolution for sustainable development. CIVICUS believes raising civil society’s awareness of and engagement with the SDGs and particularly SDG16 Peace, Justice and Strong Institutions can support organisations’ ability to align as well as find allies and resources for their collective work improving the possibility to reach the SDG targets.

**Sustainable Development Goals**

The 17 officially noted Sustainable Development Goals (chart courtesy of UNDP).
the discussion on how participants could make decision-making more inclusive and responsive in their own communities.

In Africa, surveys were completed from nine countries: Ethiopia, Liberia, Togo, Uganda, Gambia, Cameroon, Nigeria, South Sudan and Zambia. Many of the examples of being able to influence decision-makers were through engaging in church groups, student associations and unions, and local community organisations. There were additional examples of being able to influence family members, reporting crimes and influencing a crowd to take a thief to the police instead of conducting mob violence.

In MENA, there were similar examples of influencing decision-makers with a few variations. In the view of Syrian women, lived experiences of political participation included: choosing to marry or divorce; personal and family decisions, especially about education; participating in anti-government protests; travelling between Syria and Turkey and participating in the labour market and in civil society. Across the MENA region, many respondents actively declared that their country had given them no meaningful chance to participate in the political system. In Iraq especially, there were very negative perceptions of the political system, which was described as corrupt, unrepresentative of women and minorities, unconcerned with youth’s opinions, built on private interests, and sectarian. Several respondents said they are scared to talk about politics. Positive examples cited of political participation were mainly from outside the traditional world of politics - for example through education, teaching or other employment, or civil society.

Again, in Latin America, there were more similarities than difference with the other regions. Yet more than in other regions, participants considered voting as the principal way of “having a say” in politics. Some others also mentioned that they knew that there existed different “initiatives to participate and contribute as citizens” but they considered them ineffective. Many participants also mentioned that citizen mobilization and protests can change government decisions and that “although it is difficult to participate in a direct way, people could always influence the debate”.

The principle obstacles towards inclusive decision making were:

<table>
<thead>
<tr>
<th>SDG Goal 16</th>
<th>Ensure responsive, inclusive, participatory and representative decision-making at all levels.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Indicator 16.7.1</td>
<td>Proportions of positions in public institutions compared to national distributions.</td>
</tr>
<tr>
<td>Indicator 16.7.2</td>
<td>Proportion of population who believe decision-making is inclusive and responsive, by sex, age, disability and population group</td>
</tr>
</tbody>
</table>

Each SDG has its own targets and indicators. A target is a specific objective that will help to achieve the goal. An indicator is a way to measure if the goals are being met. The example below shows one target and two indicators for SGD 16: Peace, Justice and Strong Institutions.

"I once held positions as president, medical community development service (Medical CDS), during my National Youth Service Corps (NYSC) in Ebonyi state. During my tenure, we were able to pressure the local government chairman to provide Handwashing facilities in all primary/secondary schools within Afikpo-North LGA, Ebonyi state."

– Reported through 2018 SPEAK! Campaign from Nigeria
corruption, "the irrelevance of the topics that are subject to public participation" add the fact that "only a minority can participate in politics". In general, decision-making remained connected to the local level. When participants were asked to describe a place or time when they were able to influence decision-making in a positive way, most of them expressed they were able to participate and change, "little aspects or decisions in their neighbourhoods and communities", they expressed "helping others" as a way of participation; "teaching"; "participating in student unions"; "taking part in environment assemblies", anti-corruption protests, "talking about abortion", "in women organisations" and using the media as a way of expressing themselves.

Conclusion

In this SPEAK! SDG16 example, organizations across the globe coordinated their effort amongst themselves and using official indicator data methodology were able to participate in the national dialogue happening with SDG16. In the process, they had a meaningful dialogue about how to make decision-making inclusive and responsive in their own communities. The SPEAK! success around inclusive and responsive decision-making inspired civil societies to hold entire workshops dedicated to having people come together to collect, analyse and find solutions on SDG16.7.2. These people-powered workshop\(^5\) have resulted in greater local action to influence decision-making.

Examples include a businessman in South Africa advocating the local council for a girl's youth sports team to get access to playing fields, which they had been consistently denied use. And a female-based youth group in Tanzania investigating the collection and use of trash collection fees in their neighbourhood. Civil society organised the workshops, but by putting people as the agents to collect the data, analyse the data, the people have been empowered by being given the opportunity to go past participating and begin doing. Right now, we see many small steps being taken. We look forward to seeing how those small steps multiple as civil society takes the lead in coordinating opportunities for people to start "doing data" and the benefits to more inclusive and responsive decision-making.  

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\(^5\) [https://www.fabriders.net/participatory-sdg-indicators/](https://www.fabriders.net/participatory-sdg-indicators/)

-- Hannah Wheatley, The Data Shift Initiative, CIVICUS
In the wake of the 2017 genocide in Rakhine State, Myanmar, more than 700,000 Rohingya people fled into Bangladesh, crossing the border in what soon became the world’s fastest-growing refugee crisis (UNHCR, 1). These arrivals added to thousands of Rohingya who had fled oppression over decades, making a total number of 920,900 refugees in the Cox’s Bazar area (SEG, 2).

This humanitarian crisis is protracted. Refugees not only face malnutrition, disease, a lack of water, sanitation and other basic services, but landslides and floods from frequent monsoon weather provide an additional threatening risk.

In the Kutupalong - Balukhali camp there is an average of 10.7 square metres of usable space per person, compared to the recommended international standard of 45 square metres per person (Human Rights Watch, 3). With flimsy shelters built over the mud-clad hilly terrain, the risk of landslides is significant, with high population density increasing vulnerability.

Compounding these conditions, many aid agencies rushed in with little consultation, building shallow tube wells and badly placed latrines in their haste to meet donor expectations. Consequently, many water supplies dried up or became contaminated (Children on the Edge, 4).

The benefit of community-owned work
Children on the Edge (a UK based INGO) had been working with the Rohingya refugee community on the border for eight years. Partnering with local organisation Mukti Cox’s Bazar, they worked on building strong relationships with the refugee and the local community, and over this time, were the only organisation providing education for children in the makeshift Kutupalong camp.

A government ban on INGO provision in the unofficial camps resulted in the organisation training the refugee community to provide education themselves, from 2010. Tacit agreement from authorities was gained by building low-profile schools onto the side of existing dwellings and training refugees to teach. Schools were maintained by ‘School Management Committees’ (SMCs) from the community, who were responsible for upkeep and ensuring the wider community shaped the direction of the programme.

This created a culture of resilience where, in spite of many challenges (cyclones, floods, political unrest, government restrictions) 2,700 children received a quality education, with a noted improvement in health and peaceful behaviour (Promising Practices, 5).

Seven years of strengthening community ownership meant the organisation was well placed to respond to the crisis in August 2017. To identify needs and gaps in services, over 5,000 homes in Cox's Bazar were canvassed, followed by zones covering 30,000 households in the Kutupalong- Balukhali camp.

This example of community-led education programmes are not the only example of how community-involvement in the area led to greater resilience: considerable time was spent working with the refugee community to establish how basic needs could best be met. When their 200 latrines and 34 tube wells were built, they were in suitable areas to avoid contamination and built to a minimum depth of 10 rings per latrine and 700 ft per well. In each block of the camp where facilities were built, a 'WASH Committee' was established, consisting of 10 members from the refugee community (Children on the Edge, 4).
6). These committees are responsible for the maintenance and use of the facilities, either making repairs themselves or contacting Mukti to report problems. They took decisions on various elements, electing to have spilt chamber wells keeping washing and drinking water separate and requesting locks for latrines to ensure women’s safety.

Committee member Naeem said “Before people would come and build a well or a latrine and then they leave. They don’t talk to us. We don’t know who they are. They just hang up their sign and leave when it is finished. But these people talk to us. We know who they are” (Children on the Edge, 7).

Within weeks, many people were walking for over half an hour to reach these wells because of the purity of the water. Local expertise ensured proper depth and placement, so facilities were not affected by the heavy rains. Hussein, another committee member said, ‘We keep them very clean. The roof was damaged during a storm, but I was able to fix it. Everyone here is happy, we have the best water in the block. When it rains, many of the wells have a brown colour water, but ours is clean, it never changes colour’ (Children on the Edge, 8).

Once the humanitarian response was completed, Children on the Edge turned their attention to consistent provision of education for children in the camps and, with the same focus on community ownership, set about constructing 75 Learning Centres. With community involvement, this meant having access to local knowledge: Learning Centres were placed on high ground, built with semi-permanent materials for flexibility if the refugees moved on, but with concrete floors to survive the rains.

When these rains intensified, 110 Centres built by other agencies were damaged by landslides and 70 were damaged by flooding (ISCG, 9), not one of the 75 Centres built by Children on the Edge was destroyed and 8,200 children continued to receive education in a safe place, with trained refugee and Bangla teachers. These teachers were not only trained to teach about flood response but, having seen health improve in the original programme (Promising Practices, 10), were equipped with First Aid skills and basic hygiene and sanitation knowledge, countering the rise of waterborne diseases and minor ailments. Like the original project, School Management Committees were established to maintain and shape the work.

Child councils are also formed at each Centre, where refugee children represent the views of their peers, influence the direction of the work and are responsible for communicating learning about safety and protection (i.e. trafficking prevention, health and sanitation) back to their communities. Piloted in Cox’s Bazar Learning Centres, Child Councils have not only influenced the running of the schools but introduced better health and hygiene practices, vegetable growing techniques in their local areas and campaigned against child marriage (Children on the Edge, 11).

Community ownership allowed children’s education and protection to thrive for eight years in an extremely volatile environment. Now these policies have been replicated through a larger undertaking, it is hoped that communities will see similar strong results.

References
2. Strategic Executive Group. Mid Term Review. JOINT RESPONSE PLAN FOR ROHINGYA HUMANITARIAN CRISIS. Bangladesh, March – Dec 2018
6. Children on the Edge. COTE Rohingya Response – February 2018 Field Update. United Kingdom, Feb 2018
Civil society organizations (CSOs) across the world are increasing being restricted to operate freely due to the challenges of legitimacy, accountability and transparency. The CIVICUS State of Civil Society Report 2018 reports an alarming rise of government measures that restrict and close space for the civil society to exercise core civic freedoms, to advance citizens' rights and to hold governments accountable.

There are some technological breakthroughs in the field of big data and artificial intelligence that seek to change the status quo. Operação Serenata de Amor, a flagship project on artificial intelligence for social control of public administration is one such initiative. Started by a group of civic hackers in Brazil, this initiative is an open project that uses data science to monitor public spending and sharing information in a way accessible to everyone. Serenata has created Rosie: an artificial intelligence bot that analyzes Brazilian congress members' expenses while they are in office to empower citizen demands for social accountability.

Rosie has been quite a success with the citizens of Brazil. She currently has over 40,000 followers on Twitter and communicates with citizens in an accessible and easy to comprehend way. This popularity was possible because Rosie wasn't all about computer programming and coding alone. A lot of journalists, marketing people, designers and communicators were also part of this initiative and helped in creating a lasting and meaningful engagement with the general public of Brazil.

To allow people to visualize and make sense of the data that Rosie generates, another A.I. bot called Jarbas was created. In this bot's website, users can browse congress member's expenses and get details about each one of the suspicions. It is the starting point to validate a suspicion. By combining Rosie and Jarbas, and making open data more meaningful and accessible, the initiative made room for journalists to browse data and find their own stories.

Fostering social accountability through the use of artificial intelligence and social media has been highly beneficial for Brazil. Firstly, it has greatly brought down the cost of pursuing corruption cases in the country through the traditional route of courts and attorney general's office. In the traditional way, the pace of the proceedings is slow and the costs can go as high up US $ 15,000. Taking the problem to Twitter in a transparent way - by using an open-source robot with neutral language and factual data - was a solution that has proven to be more efficient and effective.

Rosie also forced members of Congress to explain themselves and correct their behavior. Public pressure can be more influential than an arrest, especially if the alternative is a lengthy and expensive court case that uses public funds. Second, using a social media platform to gather people around the open data itself, through an automated platform, has the potential to transfer power to the citizens and for them to take advantage of a pre-built space to hold their representatives accountable.

Openness, transparency and building an engaged community nationwide were big reasons why the initiative was so successful. The success of Rosie and Jarbas should be a case study in how artificial intelligence and big data can be used to foster greater social accountability.

A. Context

Over the last decade, accountability for non-governmental organizations operating in humanitarian action has consistently increased. Humanitarian organizations and NGOs have come under immense pressure from donors and national governments alike to open themselves up for greater scrutiny. While this type of top-down accountability is on the rise, little progress has been made on accountability to the intended beneficiaries of these humanitarian programmes on whose behest such organizations operate. Further, the notion of lateral accountability is almost completely lost in debates where most discussions revolve around up-ward and down-ward accountability.

While financial and procedural accountability are extremely important, they need to be complemented with accountabilities to citizens especially those affected by humanitarian crises. While the global humanitarian system has gradually opened itself to the idea of 'Accountability to Affected Populations' (AAP) yet there is still a lot of ground to be covered for real and meaningful accountability to take place.

The slow progress of bottom-up accountability for humanitarian organizations can be attributed to the following reasons. Firstly, ensuring accountability in times of humanitarian crises can be challenging. The first priority of humanitarian organizations is to rescue and provide relief and rehabilitation to a crisis affected population. In short, the aid provided by such organizations can often be life-saving if it is delivered on-time. Operating in such challenging contexts can relegate accountability on the back burner. Second, there is also a view that the humanitarian actions of such organizations should be beyond accountability because they are doing good for society at-large in most complex context. Moreover, relief operations are generally ad-hoc in nature which need to be executed in a short span of time. Given the limited time frame, all organizational resources are directed towards providing succor to the needy and not on being accountable.

The above two attitudes to accountability are quite common in the field of humanitarian actions, particularly in disaster risk reduction, conflict situations and climate change adaptation.

B. AIDMI Experience

The All India Disaster Mitigation Institute (AIDMI) has worked extensively with crisis affected populations as well as the humanitarian organizations that work to provide relief to such populations. Based on AIDMI work, we have the following observations categorized according to specific themes:

• Accountability to Citizens Affected by Polluted Air

India's ambient air pollution and air quality has been the cause of a lot of alarm and hand-wringing. As India's cities choke with smog, there are long term ramifications that can affect public health, investment, education outcomes and the general quality of life in our cities. AIDMI recognized this threat and decided to partner with University of Birmingham and Indian Institute of Technology (IIT) Delhi to work on system's approach to air pollution.

AIDMI's role in this project was that of community-based organization that would capture the true impact of air pollution on the most exposed citizens of cities like Delhi and Ahmedabad. This experience taught a real lesson in accountability. It became apparent that the most exposed persons (street vendors, slum dwellers, urban poor) to air pollution do not have recourse of making their voices heard to the government on pollutions. Therefore, there is little accountability in this area and who is accountable to whom across time and space or locations is a big challenge.

• Accountability to Heat Wave Affected People

The accountability index on heat waves has improved a lot. The National Disaster Management Authority (NDMA) has recognized that heat waves pose a disproportionate risk to the poor and street dwelling people as compared to their rich counterparts. Consequently, institutional measures such as Heat Wave Action Plan have been devised and implemented by city governments to protect their citizens. Extensive awareness building campaigns
and sensitization efforts have also borne fruit. Early warning is issued and disseminated in media (local news, electrical hoardings and SMS) to reach out masses. All this became possible only because the Plan holds specific authorities responsible to take certain actions in case of possible Heat Wave.

• **Accountability to Vulnerable Citizens Facing Climate Uncertainties**

Climate uncertainties refer to the uncertainty about the extent of climate change impact on an area or population. Scientists, policy makers and local communities are all active stakeholders in any dialogue on climate uncertainty. AIDMI pioneered three roundtable discussions on Climate Uncertainty organized by the Norwegian Council of Research and Institute of Development Studies, Sussex, to understand different perspectives on this uncertainty at different levels. In terms of accountability, there was little evidence to suggest that the voices of communities at the bottom level were considered by policy makers at the top level in formulating policies and legislations. Taking into account traditional knowledge and know-how, including options to protect livelihoods of citizens in shaping policies and plans is one way of being accountable to those who are directly affected by climate change.

• **Accountability to Children**

AIDMI was recently involved with evaluating World Vision India’s work on Mental Health and Psycho Social Support (MHPSS) to children who were affected by the 2018 Kerala Floods. In that assessment, it was reported by the children and their families that accountability concerns were largely met by the humanitarian agency but there is scope for improvement as well. Children need to be empowered in humanitarian settings to express their needs more freely to humanitarian and government entities. And children can only be empowered when family and schools are prepared to be accountable to the children.

• **Accountability to Disaster Affected Population**

AIDMI was invited by a consortium of eminent humanitarian agencies to carry out a study funded by the START Network on Accountability to Affected Populations in Odisha, Kerala and Assam. This study spread across 3 states and assessed the accountability mechanisms in place during the relief phase of humanitarian operations.
undertaken by various NGOs in responding to floods and cyclones. This study highlighted how participation of affected communities especially women and poor citizens in designing relief programmes is essential for ensuring accountability.

• **Accountability to People without Social Protection**

AIDMI review for key donors of social protection arrangements for disaster recovery in Asia Pacific shows that accountability can be limited and confined to a specific target group. Delivery of goods is one thing but how goods are delivered and within what period is also important. Producing excel sheets containing beneficiary details and goods distributed is not enough. Accountability must enhance social protection to the poor.

C. **Bottom up Accountability**

After elaborating on AIDMI’s experience of working on emerging areas of accountability in humanitarian action, the following points about bottom-up accountability must be made:

• Day-to-day accountability is far more important than occasional accountability to a big project or organisation. This means that accountability cannot be an ad-hoc exercise. It must be embedded in the humanitarian system and accountability outcomes should be tied to humanitarian outcomes.

• Accountability must transform structures and not offer mere accounts. Procedural, technical and financial accountability should never trump transformation of accountability of humanitarian structure.

• Women’s leadership in holding power structures accountable is important. In its essence, accountability is about capturing the voices of all stakeholders to design a fair humanitarian system. Thus, capturing women’s voices for accountability is critical. Without women’s leadership, accountability is only half achieved.

• Accountability in the end must remove poverty and not give us accounts of poverty. If the system is accountable but brings no change in the conditions of the poor that accountability is of limited use or value to the poor or us.

• Informality of and in accountability is an unexplored area leading to leaving out a large number of poor affected people. As over 89% of workforce in India is in the informal economy it is important to see that informal ways, tools, ideas, concepts, and pedagogy of accountability is celebrated and not by-passed or over-looked.

– Mihir R. Bhatt