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Humanitarian accountability: a conceptual analysis

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Abstract

Drawing on the public accountability literature, mainly using Bovens' concepts of *accountability as mechanism* and *accountability as a virtue*, this paper reviews existing strategies for conceptualisation and operationalisation of accountability in the humanitarian sector and compares their advantages and shortcomings.

Humanitarian work takes place in contexts that are characterised by inherent power imbalances between donors, humanitarian organisations, local communities and affected populations. In this context, humanitarian organisations have a multitude of accountability relationships, some of them are formal – for example, through contracts with donors – while others are legal and political obligations. Others are informal, such as those with affected populations who do not have any formal power to hold these organisations accountable.

Efforts from humanitarian organisations to become more accountable have to date mainly focused on *accountability virtue*, a normative concept that defines accountable behaviour, and the sector has developed a multitude of voluntary standards and business inspired frameworks. However, less attention has been paid to *accountability as a mechanism,* which requires organisations to explain and justify their conduct to a forum and face judgement. It appears that donors are the only existing forum to which humanitarian organisations do have to give an account and be answerable for their acts and performance.

The author argues that a mix of these approaches (virtue and mechanism) could improve accountability in the humanitarian sector. However, the success of such an approach to humanitarian accountability will essentially depend on how far both donors and humanitarian organisations are willing to let go of power and control.

Keywords

Contents

1. Introduction

Accountability has been a major theme in government reforms around the world and is closely linked to the development of the modern nation state and bureaucracy, with a growing role of the State as a provider of public goods, and to the request to make governments more 'accountable' to their citizens.[1] Many of these changes have been part of wider organisational processes, often brought on by a tight fiscal environment, a push for value for money and changes in government policy.[2] The academic literature and donor and humanitarian policy documents show a sharp increase in the use of the word accountability in the past two decades.[3]

The last two decades have also seen an increase in humanitarian spending, staff and organisations working in crisis-affected countries. The appearance of accountability in the humanitarian sector has also coincided with the global rise of multinational corporations, multilateral organisations and international NGOs, and the call for accountability for these actors. Attempts to make governments more efficient and effective in the deployment of public resources have also led to more pressure from donors to reform the humanitarian system and for humanitarian organisations to become more effective and results-oriented.[4] This has led to tighter levels of scrutiny from media and more calls for 'accountability' from donors and governments in the global north. Moreover, donor governments have become more involved in humanitarian crises and the policies and programmes to address them. It follows from a political and public climate that increasingly demands transparency and accountability.[5]

With a growing number of actors present in humanitarian crisis situations, humanitarian organisations must compete for funds, showing that they can deliver results and value for money. In response to calls for greater transparency and accountability humanitarian organisations have started adopting tools and frameworks that originate from the business and industry sectors, and have made attempts to operate in a more business and results-oriented manner.[6] Donors have also sought to improve humanitarian accountability by requiring humanitarian organisations to apply results-based management, use participatory methodologies and invest in innovation.[7] Many of these reforms are aimed at improving efficiency and making organisations more accountable. Humanitarian organisations have thus invested more resources and staff to become more responsive to affected populations, using client language chiming with business jargon. Participatory methodologies and information communications technology have ensured that affected populations today are more connected with humanitarian organisations than ever before.

Nevertheless, concerns about lack of accountability in the humanitarian sector keep reappearing in the academic literature and in the media,[8] and little evidence exists to show that humanitarian organisations have become more accountable. In particular, organisations face criticism for having failed to become more accountable to affected populations.[9]

Drawing on public accountability theory, using Bovens' concepts of *accountability as a mechanism* and *accountability as a virtue*, this paper aims to shed some light on and contextualise some of the current dilemmas in the humanitarian accountability debate. By unpicking accountability as a concept, the paper examines some of the challenges and opportunities for humanitarian accountability.

The first section of this paper defines accountability as a concept and how it has been adapted and implemented by humanitarian organisations. The second section analyses accountability as a mechanism and the third explores accountability as a virtue. The final section concludes by looking at how these forms of accountability can be applied in the humanitarian sector going forward.

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1   Mark Bovens, Robert E Goodin, Thomas Schillemans, *Oxford Handbook on Public Accountability*. (Oxford University Press, 2014).

2   Rachel Scott, 'Imagining more effective humanitarian aid: A donor perspective' (2014) OECD, 3 <www.oecd.org/dac/Imagining%20 More%20Effective%20Humanitarian%20Aid_October%202014.pdf> accessed 5 November 2018.

3   Austen Davis, 'Concerning accountability of humanitarian action' (2007) HPN Network Paper No. 5, 3 <www.odi.org/sites/odi.org.uk/files/ odi-assets/publications-opinion-files/8735.pdf> accessed 5 October 2018; Anna Drake, 'Locating accountability: Conceptual and categorical challenges in the literature. Policy Report 2' (2012) ENTWINED and the International Institute for Sustainable Development, 5–6 <www.iisd.org/ pdf/2012/locating_accountability.pdf> accessed 1 October 2018; Bayard Roberts, 'Accountability' in Tim Allen, Anna Macdonald, Henry Radice (eds), *Humanitarianism: A Dictionary of Concepts* (Routledge, *2018) 1.*

4   Davis (n 3) 5.

5   Ibid, 3.

6   Ibid, 4.

7   Alice Obrecht, Alexandra T Warner, 'More than just luck: Innovation in humanitarian action' (2016) HIF/ALNAP Study (ALNAP/ODI).

8   Most recently the so-called Oxfam Scandal. 'Oxfam Haiti allegations: How the scandal unfolded' (21 February 2018) BBC News <https:// www.bbc.co.uk/news/uk-43112200> accessed 10 September 2018.

9   Lois Austin, Dayna Brown, Paul Knox Clarke, Imogen Wall (eds), 'Humanitarian Accountability Report' (2018) CHS Alliance <https:// www.chsalliance.org/files/files/Humanitarian%20Accountability%20Report%202018.pdf> accessed 15 October 2018; Mark DuBois, 'The new humanitarian basics' (2018) HPG Working Paper, 1 <www.odi.org/sites/odi.org.uk/files/resource-documents/12201.pdf> accessed 28 November 2018.

2.   Defining accountability

Accountability is the buzzword of our times and has become an integral part of humanitarian policy and rhetoric. While its inclusion in policy documents and donor commitments has increased attention on the concept, a definition of accountability remains elusive. Despite the wide usage of accountability, one of the major difficulties with analysing accountability is that it means different things to different actors, and they tend to adopt different concepts of accountability.[10]

To analyse humanitarian accountability, it is thus useful to unpick accountability as a concept and what we expect from humanitarian accountability. While no agreed definition exists, most scholars agree that accountability comes from the notion that if those in power are held accountable, they will use their power less arbitrarily.[11] This traditional concept of accountability is closely linked to the Western ideology of democracy where sovereignty lies with the citizen and the authority must be held to account.[12] Voters make representatives answer for their policies, legislators can scrutinise the actions of public servants and make them answerable and members of the public can seek redress from government agencies.[13] Accountability is essentially the ability to know what an actor is doing and the ability to make that actor do something else.

One of the main challenges when applying accountability to humanitarian organisations is the fact they operate outside traditional public accountability frameworks, i.e. most of their work takes place outside their country of origin and there is neither a global government nor global citizens. Further, humanitarian organisations are not elected by the people they serve and, while they might need permission from the government of the country where they operate, they are not formally required to get approval to implement their activities from the communities in which they work.[14] Humanitarian organisations must also choose whom to assist not only within a community but in a national and sometimes global context, and they can face accountabilities in several settings at one single time. Further, humanitarian organisations operate in contexts of armed conflict, often plagued by ethnic or religious tensions, entrenched gender roles and socioeconomic inequalities and forced displacement. These contexts often lack the basic conditions for accountability to take place, i.e. lack of central authorities in charge of enforcement. Public accountability research shows that establishing accountability mechanisms is particularly challenging in conflict-affected contexts, where the state has a weak capacity to protect people and lacks the organisational capabilities to address accountability challenges.[15]

Over the past two decades, several attempts have been made by different consortiums and individual organisations to define humanitarian accountability. The most commonly agreed definition is the 2010 Humanitarian Accountability Partnership Standard which defines accountability as:

> '…the means through which power is used responsibly. It is a process of taking into account the views of, and being held accountable by, different stakeholders, and primarily the people affected by authority or power.'

The definition highlights the responsible use of power to different stakeholders, putting affected populations at the top of the list. It does not, however, specify what mechanisms are to be used to hold organisations accountable. One of the main questions that arises in this context is what kind of accountability an organisation would like to achieve in a particular setting and to whom, for what purposes and how.

A common criticism of humanitarian organisations is that they are not being accountable enough, but it is important to highlight that organisations have multiple accountabilities and must constantly choose which relationships to prioritise. Accountabilities can include those to national authorities, international donors, sectors/clusters, home country public and taxpayers, bodies of law, professional standards and the communities where the organisations work.[16] Being accountable to one actor does not automatically make an organisation more accountable as a whole since different accountability demands can be incompatible, and choices must be made between them.[17] Hence, trying to be more accountable to one actor does not always make an organisation more accountable. Instead, it will depend on the capacity and resources available to the organisation and the reasons for trying to become more accountable.

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10   Bovens, Schillemans, Goodin (n 1).

11   Drake (n 3) 9.

12   Ruth W Grant, Robert O Keohane, 'Accountability and abuses of power in world politics' (2005) American Political Science Review, Vol. 99, No. 1, 29; Davis (n 3) 1.

13   Julia Steets, Andrea Binder, András Derzsi-Horváth, Susanna Krüger, Lotte Ruppert, 'Drivers and inhibitors of change in the humanitarian system: A political economy analysis of reform efforts relating to cash, accountability to affected populations and protection' (2016) Berlin, Global Public Policy Institute, 28 <www.gppi.net/2016/05/12/drivers-and-inhibitors-of-change-in-the-humanitarian-system> accessed 15 September 2019.

14   Michael Szporluk, 'A framework for understanding accountability of international NGOs and global good governance' (2009) Indiana Journal of Global Legal Studies, Vol. 16, No. 1, 340.

15   Hamish Nixon, Anne L Buffardi, Joseph Wales, Tina Pasanen, 'Supporting accountability in fragile settings: A review for the Somalia Implementation and Analysis in Action of Accountability Programme' (2017) ODI, 16–19 <www.odi.org/publications/10870-supporting-accountability-fragile-settings-review-somalia-implementation-and-analysis-action> accessed 15 September 2019.

16   Davis (n 3) 9. See also Table 1.

17   Jonathan GS Koppel, 'Pathologies of Accountability: ICANN and the Challenge of "Multiple Accountabilities Disorder"' (2005) Public Administration Review, Vol. 65, No. 1, 94–108, 95.

Responding to multiple accountabilities to many different actors at the same time can bring about what Koppel refers to as Multiple Accountabilities Disorder (MAD). MAD can lead to a lack of specificity about what an organisation wants to achieve with its accountability efforts which in turn may undermine the organisation's success.[18] The table below outlines some of the many possible accountabilities for humanitarian organisations.

Table 1. Accountabilities for humanitarian organisations[19]				
Location of accountability	To whom	Accountability elements	Type of accountability	Concept
Country where the organisation operates	*National authorities*	National law Access and mandate agreements Humanitarian agency coordination: United Nations Country Teams (UNCT), *Comprehensive Refugee Response Framework (*CRRF), etc. Standards and systems, for example health	Legal	Mechanism
	Local communities	Engagement and consultation Service agreements Contracts (facilities etc.)	Participatory	Virtue
	Affected populations This can happen in several countries simultaneously. For example, an agency might have to shift funds from one country to another due to a more urgent crisis	Engagement and consultation Quality of services delivered Protection provided Information shared Adaption based on feedback	Participatory	Virtue
Sectorial	*International agencies, UN and international NGOs*	Professional standards (e.g. Sphere), clusters (e.g. protection etc.)	Peer	Mutual/collective virtue
	Colleagues	Internal governance	Supervisory	Mechanism
	Donors	Reporting/framework agreement	Fiscal	Mechanism
	Consortiums (Core Humanitarian Standards (CHS) etc.)	Self-certification and assessment	Peer	Mutual
Home country	*Donors*	Reporting	Fiscal	Mechanism
	Media	Access to records and data/news coverage	Public reputational	Virtue
	Public (taxpayers)	Voting, public pressure	Hierarchical/public reputational	Mechanism
	Government regulations	Government sanctions/country agreements	Hierarchical	Mechanism
Bodies of law	*International human rights law, international refugee law, international humanitarian law, national courts and agencies*	Upholding internationally recognised norms National laws on charities	Legal/mutual	Mechanism/virtue
Profession (e.g. medicine)	*Professional associations*	Bodies of ethics Licence to practice	Peer Hierarchical	Mutual
	Professional publications	Peer review	Peer	Mutual
	National courts	Research protocols and ethics	Legal	Mechanism

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18   Ibid.

19   Adapted from Davis (n 3).

Even though organisations face multiple accountabilities, the lack of an agreed definition can blur responsibilities and makes measuring actual progress difficult. Hence, humanitarian organisations can declare their commitment to accountability, but the lack of clarity of the meaning of the concept can undermine accountability efforts and mean they have not substantially changed the way in which they work.[20]

In order to analyse humanitarian accountability further, the following two sections will rely on two accountability concepts, *accountability as a virtue* and *accountability as a mechanism,* developed by accountability scholar Mark Bovens.[21]

20   Koppel (n 17).
21   Mark Bovens, 'Two concepts of accountability: Accountability as a virtue and as a mechanism' (2010) Western European Politics, Vol. 33, No. 5, 946–967.

3.   Accountability as a mechanism

Accountability as a mechanism is about the nature of relationships between different actors and has three important elements that need to be satisfied for an accountability relationship to be established. First, those in power should have an *obligation* to *explain and justify* their conduct after a wrongdoing or lack of trust from those judging. Second, there needs to be a *forum to report to* and, third, the forum needs to have the *authority to sanction* those in power. In this regard, accountability as a mechanism is *ex post facto* and an agent is accountable when there is a relationship between the agent and the forum in which the actor is obliged to explain and justify their conduct, and the forum can pose questions and pass judgement and the actor may face consequences.[22] Hence, accountability has two important elements: to answer (*answerability*) for one's action or inaction and, depending on the answer, face sanctions (*enforcement*), both positive and negative.[23] In order to be effective it should identify those in power who are accountable and those who can demand answers.[24] It means that those calling for an account have authority over those who are accountable, including rights to demand answers, use external scrutiny and to impose sanctions.[25] Hence the locus is not on the behaviour of an actor, but the way in which institutional arrangements operate to hold them to account.[26]

The most obvious example of accountability as a mechanism in the humanitarian context is the relationship between humanitarian organisations and donors. An agreement has been signed that obliges the organisation to report to the donor who will then assess the results and make a judgement whether the goals have been met and whether to continue funding or not. Accountability as a mechanism in the humanitarian sector has mostly focused on value for money and showing results and project impact. To achieve this, donors have promoted results-based management (RBM) frameworks. RBM was introduced to the humanitarian realm as a form of new public management (NPM), analysing how organisations are spending their resources and project outcomes. In NPM, the public is viewed as a consumer operating within a free-market system, and RBM will ensure accountability and transparency to the taxpayer.[27] Accordingly, organisations should demonstrate results, make adjustments for future programming and show value for money to become more accountable.[28]

As a result, humanitarian organisations have become more results-oriented, and place more emphasis on monitoring and evaluation mechanisms in order to identify successes and failures. However, lack of donor funding for in-depth evaluations has led to superficial evaluations and RBM efforts have not necessarily improved accountability.[29] The emphasis on results has taken focus away from holding organisations to account for quality of decision making; for example, being accountable to populations not reached by aid or the unintended consequences of humanitarian action, such as prolonging wars, putting people at risk and fostering dependency instead of self-reliance.[30] Thus, while a mechanism to hold organisations accountable exists, current practice seldom includes an obligation for humanitarian organisations to answer for action and inaction, for poor decisions or poor performance.

Over the past two decades the concept of accountability to affected populations (AAP) has become a mainstream approach among humanitarian organisations. APP was spurred by the so-called 'Participation Revolution', which emerged from the 2016 Grand Bargain agreements,[31] the World Humanitarian Summit and Inter Agency Standing Committee's (IASC) call for a 'system-wide culture of accountability'.[32] AAP emphasises participation and ownership from affected populations and should promote developing protection responses in a bottom-up fashion, fostering local protection capacity and preparedness. It aims to ensure that affected populations have the power to influence their situation and the decisions affecting them.[33] Humanitarian organisations have in recent years intensified their efforts to allow affected populations to participate in the design, monitoring and evaluation of humanitarian projects. This includes establishing two-way communication and most humanitarian organisations today have so-called complaints and feedback mechanisms.[34] These efforts have been enhanced by the use of information and

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22   Ibid; Mark Bovens, 'Analysing and assessing accountability: A conceptual framework' (2007) European Law Journal, Vol. 13, No. 4, 447–468.

23   Davis (n 3) 4.

24   Robert Mulgan, '"Accountability": An ever-expanding concept?' (2000) Public Administration, Vol. 78, No. 3, 550–573, 555.

25   Ibid.

26   Bovens (n 21) 948.

27   Ben Ramalingam, John Mitchell, John Borton, Kristin Smart, 'Counting what counts: Performance and effectiveness in the humanitarian sector' (2009) ALNAP, 21–31
<www.alnap.org/help-library/alnaps-8th-review-of-humanitarian-action-counting-what-counts-performance-and> accessed 10 December 2018.

28   Steven Smith Rathgeb, 'Accountability and the non-profit sector', in Bovens, Goodin, Schillemans (n 1).

29   Roberts (n 3) 10.

30   Mark DuBois, 'Humanitarian priorities: Accountability Meeting Report' (2016) HERE, Geneva <http://here-geneva.org/wp-content/uploads/2015/09/Accountability-report_May2016.pdf> accessed 10 October 2018.

31   'The Grand Bargain – A shared commitment to better serve people in need', (23 May 2016) Istanbul, Turkey, 10 <https://reliefweb.int/sites/reliefweb.int/files/resources/Grand_Bargain_final_22_May_FINAL-2.pdf>.

32   IASC outlines five main areas to achieve this: Leadership and governance; Transparency; Feedback and complaints mechanisms; Participation; and Design, monitoring and evaluation.

33   D Brown, A Donini, P Knox Clarke, 'Engagement of crisis-affected people in humanitarian action' (2014) Background Paper of ALNAP's 29th Annual Meeting, 11–12 March, Addis Ababa. (London: ALNAP/ODI) <www.alnap.org/system/files/content/resource/files/main/background-paper-29th-meeting.pdf>.

34   Francesca Bonino, Isabella Jean, Paul Knox Clarke, 'Humanitarian feedback mechanisms: research, evidence and guidance' (2014) ALNAP

communication technology and have enabled affected populations to get better access to humanitarian staff and organisations than ever before. Yet, complaints are often received by the staff from the same organisation that the complaint is addressing, which has proven to be highly problematic, in particular in cases of abuse. The 2018 Oxfam scandal highlighted the need to keep advocating for more initiatives on accountability as a mechanism, as a complement to self-regulation and internal accountability measures.[35] Research with affected populations shows a reluctance to make complaints about humanitarian agencies, fearing negative repercussions such as losing their assistance.[36] This suggests that humanitarian organisations have not yet established a forum where they can be held accountable by affected populations, as outlined by Boven.

The most controversial proposal to close this gap is the establishment of a *humanitarian ombudsperson.* The proposal was tabled twenty years ago by the Joint Evaluation of Emergency Assistance in Rwanda after the failure to protect civilians during the Rwandan Genocide. Led by the British Red Cross, it envisioned an ombudsperson that would act as an independent, impartial body to regulate organisations' activities in humanitarian emergencies, including failure to comply with any relevant legal obligations or codes of practice. It would also be able to receive and investigate complaints from affected populations and hold organisations to account for their activities in the field.[37] The proposal gained limited support from humanitarian organisations, who were not keen to open themselves up to scrutiny from a third party.[38] Twenty years later, Bennet, in her policy paper *Constructive deconstruction: imagining alternative humanitarian action,* suggests an independent watchdog *Relief Watch*, that evaluates the impact of humanitarian interventions using peer-to-peer and top-down approaches. This body would be governed by an independent board composed of individuals from outside the humanitarian sector but appointed by humanitarian organisations. It would have a peer-review system documenting 'user' experiences that would generate 'user' ratings. Based on these two forms of evaluation, the board would then make accountability ratings for organisations and these ratings could be used by agency boards and funders to ensure corrective action. Funding would be raised through an automatic 1 per cent tax levied on all participating humanitarian actors, supplemented by private and/or pooled funds.[39]

Bennet's proposal could move the sector closer to an accountability as a mechanism approach. Similar to the ombudsperson proposition, it relies on voluntary buy-in from humanitarian organisations who remain reluctant to yield power to an independent body that could make recommendations about their performance, behaviour and future funding. This might also well be why it has not yet been implemented and affected populations remain without a forum where they can hold humanitarian organisations to account.

The NGO Ground Truth Solutions has pioneered a middle way, where it conducts interviews and surveys with affected populations to understand if humanitarian assistance is relevant and if they feel respected and trust the organisations working for them. It also inquires whether affected populations know how to seek recourse in cases of abuse.[40] The results are then shared with humanitarian organisations. This provides affected populations with an independent actor (forum) to whom they can express their opinions and concerns without exposing themselves or fearing negative repercussions from the organisations assisting them. However, the decision of whether to act on such inputs still remains in the hands of humanitarian organisations.

Outside of donor relationships, there has been little support for any form of mechanism or external scrutiny to hold organisations to account. To address this gap, organisations need to become better at creating safe spaces for interaction with affected populations and invest more in building on populations' capacities and self-protection mechanisms, as well as working with local governments and leaders.[41] Generally, humanitarian organisations have not invested in developing accountability as a mechanism and without political will from humanitarian organisations to render power, the scope of any such accountability efforts will remain limited.

With few options of formal forms of accountability as a mechanism available, non-formal channels should not be ignored. The Oxfam scandal proves that, when formal mechanisms fail, non-formal mechanisms such as using public

Study. (London: ALNAP/ODI) < https://www.alnap.org/system/files/content/resource/files/main/alnap-cda-study-feedback-mechanisms.pdf>.

35   Dorothea Hilhorst, 'Aid agencies can't police themselves. It's time for a change' IRIN (22 February 2018) <https://www.irinnews.org/opinion/2018/02/22/aid-agencies-can-t-police-themselves-it-s-time-change> accessed 30 October 2018.

36   Kirsti Lattu, 'To complain or not to complain still the question: Consultations with humanitarian aid beneficiaries on their perceptions of efforts to prevent and respond to sexual exploitation and abuse' (2008) Humanitarian Accountability Partnership <www.pseataskforce.org/uploads/tools/tocomplainornottocomplainstillthequestion_hapinternational_english.pdf> accessed 1 December 2018; Ground Truth Solutions and OECD 'The Grand Bargain: Perspectives from the field' (2018) <www.alnap.org/system/files/content/resource/files/main/Grand-Bargain-briefing-note-June-2018.pdf> accessed 20 November 2018.

37   David Peppiat, 'The Ombudsman Project: pilot project to investigate the concept of an Ombudsman for humanitarian assistance' (1997) Humanitarian Practice Network – Relief and Rehabilitation Network, Issue 9 <https://odihpn.org/magazine/the-ombudsman-project-pilot-project-to-investigate-the-concept-of-an-ombudsman-for-humanitarian-assistance/> accessed 15 December 2018.

38   Ian Christoplos, 'A humanitarian ombudsman revisited?' (15 March 2018) ALNAP <https://www.alnap.org/blogs/a-humanitarian-ombudsman-revisited> accessed 30 October 2018.

39   Christina Bennet, 'Constructive deconstruction: Imagining alternative humanitarian action' (2018) HPG Working Paper, 12–13 <https://www.odi.org/publications/11127-constructive-deconstruction-imagining-alternative-humanitarian-action> accessed 1 November 2018.

40   Ground Truth Solutions <https://groundtruthsolutions.org/> accessed 15 September 2019.

41   Dorothea Hilhorst, 'Taking accountability to the next level' in 'Humanitarian Accountability Report: How can the World Humanitarian Summit make humanitarian response more effective?' (2015) CHS Alliance, 109 <www.chsalliance.org/files/files/CHS-Alliance-HAR-2015.pdf> accessed 20 October 2018; Larissa Fast, Kate Sutton, 'Protection in local response to disasters: Challenges and insights from the Pacific region' (2018) ODI <www.odi.org/publications/11209-protection-local-response-disasters-challenges-and-insights-pacific-region> accessed 20 November 2018.

pressure and media reporting can be effective tools to achieve some degree of accountability in cases of misconduct or violations. Considering the lack of formal avenues available, using non-formal accountability forms can therefore be an effective way to make humanitarian organisations more accountable. Nevertheless, more research and funding should go into analysing how humanitarian organisations handle unwelcome feedback to ensure there is a real prospect of redress for victims of abuse and feedback is not merely tokenistic.[42]

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42   Davis (n 3) 13; Dayna Brown, 'Participation of crisis affected people in humanitarian decision-making processes' in Lois Austin, Danya Brown, Paul Knox-Clarke, Imogen Wall (eds), 'Humanitarian Accountability Report' (2018) 31–34 <www.chsalliance.org/files/files/Humanitarian%20Accountability%20Report%202018.pdf> accessed 20 November 2018.

4.   Accountability as a virtue

As discussed in the previous section, accountability as a mechanism only addresses issues *ex post facto* and, while fear of sanctions can be a motivator to make organisations accountable, it does not provide tools or incentives to ensure improvement.[43] Moreover, a fear of losing funding can create an organisational culture that is defensive and closed.[44] Thus, humanitarian organisations generally do not consider it to be an effective tool to enhance their culture of accountability.[45] Instead, they have been more committed to *accountability as a virtue,* which is a normative concept that defines accountable behaviour through, for example, standards. It is about a sense of responsibility or a willingness to act in a transparent, fair, compliant and equitable way and focuses on performance measured against standards. Being accountable is thus considered as a *virtue*, something that can qualify an actor in a positive way.[46] Essential questions to be asked are: Who is accountable to whom, for what, by which standards and why?[47] In this regard, Koppel outlines five dimensions of accountability for organisations: *transparency, liability, controllability, responsibility and responsiveness* to assess whether an organisation is accountable. Organisations can be held accountable under more than one dimension and the five dimensions are not mutually exclusive.[48]

Table 2. Conceptions of accountability (Koppel 2005)	
Conception of accountability	Key determination
Transparency	Did the organisation reveal the facts of its performance?
Liability	Did the organisation face consequences for its performance?
Controllability	Did the organisation do what the principal (overseer) desired?
Responsibility	Did the organisation follow the rules?
Responsiveness	Did the organisation fulfil the substantive expectation (demand or need)?[49]

While accountability as a virtue is widely used in the humanitarian sector, there is still no consensus about the standards for accountable behaviour. Instead, sectors and organisations have created their own standards that they choose to abide by. Currently, there are some seventy different local, regional and global accountability standards for humanitarian organisations[50] and some 150 different tools for the same purpose.[51] The most widely used standard is the 2014 Core Humanitarian Standard on Quality and Accountability (CHS), which draws upon several previous standards and initiatives.[52] The CHS sets out nine commitments and allows organisations to measure their compliance through self-evaluation, peer review, independent verification and certification.[53]

The nine commitments of the Core Humanitarian Standard on Quality and Accountability
Communities and people affected by crisis receive assistance appropriate and relevant to their needs. Humanitarian assistance is appropriate and relevant.
Communities and people affected by crisis have access to the humanitarian assistance they need at the right time. Response is effective and timely.
Communities and people affected by crisis are more prepared, resilient and less vulnerable as a result of humanitarian action. Humanitarian action strengthens local capacities and avoids negative effects.
Communities and people affected by crisis know their rights and entitlements and participate in decisions that affect them. Humanitarian action is based on open feedback and inclusive participation.
Communities and people affected by crisis have access to a safe and responsive complaints mechanism. Complaints are welcomed and addressed.
Communities and people affected by crisis receive coordinated, complementary assistance. Humanitarian action is coordinated and complementary.

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43   Drake (n 3) 9–10.

44   Dubois (n 30) 4.

45   Volker Turk, Elizabeth Eyster, 'Strengthening accountability in UNHCR' (2010) International Journal of Refugee Law, Vol. 22, No. 2, 159–172.

46   Bovens, Schillemans, Goodin (n 1).

47   Ibid.

48   Koppel (n 17) 95–99.

49   The demand approach is about citizen or constituent preferences and the need approach is assessing the policy goals of the organisation.

50   For more information, see: https://corehumanitarianstandard.org/.

51   Julien Carlier, Hugues Maury, 'Peer review a way for the humanitarian sector to learn and improve' (2015) Humanitarian Aid on the Move, Review No. 15, 23 <www.urd.org/wp-content/uploads/2019/04/HEM15_EN_Webpdf.pdf> accessed 15 September 2019.

52   Including but not limited to: The Code of Conduct of The International Red Cross and Red Crescent Movement and NGOs in Disaster Relief, The Sphere Core Standards, The 2010 HAP Standard, The People In Aid Code of Good Practice, Quality COMPAS, ALNAP Evaluation Guidelines, OECD-DAC Criteria, IASC Commitments on Accountability to Affected Populations (CAAP), The Good Humanitarian Donorship Principles, The IFRC Disaster Law Programme Model, The Global Humanitarian Platform Principles of Partnership.

53   The Core Humanitarian Standard on Quality and Accountability <https://corehumanitarianstandard.org>.

The organisation learns from experience in order to improve outcomes for communities and people affected by crisis. Humanitarian actors continuously learn and improve.
Staff are treated fairly and equitably and are supported to do their job effectively. Humanitarian staff are managed and supported responsibly.
Organisations use resources efficiently and effectively for their intended purpose. Resources are used and managed responsibly.

A substantial part of the standards relates to AAP. For example, Commitment 1 requires assistance is appropriate and relevant to the needs of affected populations; 4 – affected populations should participate in decisions that affect them and humanitarian action should be based on feedback and participation from affected populations; 5 – populations have access to a safe and responsive complaints mechanism and complaints are responded to; and 7 – 'organisation learns from experience in order to improve outcomes for communities and people affected by crisis'. While standards and commitment to AAP have become a priority for many organisations, definitions and approaches to AAP among, and sometimes within, organisations vary and there are few tools to measure AAP outcomes. Thus, measuring progress and achievement is difficult. Moreover, there are few incentives for organisations to change their decision-making processes to allow affected populations to participate in them.[54] Consequently, AAP initiatives have so far done little to change the power dynamics between affected populations and humanitarian organisations, and affected populations still have little control over the organisations that provide them services.[55]

In the pursuit of AAP, some organisations have borrowed a client approach from the private sector, promising to place the satisfaction of the 'client' at the centre of the organisation's efforts. The International Rescue Committee (IRC) is one of the leading organisations applying this model through their *Client Voice and Choice Initiative*.[56] IRC claims that its policy is deliberately provocative in highlighting the current lack of power of many of the people it works for and the IRC's desire to transfer power to them. The policy builds on the notion that clients (affected populations) who receive their services (humanitarian assistance and protection) should be able to change provider if the service does not meet their expectations.[57]

Even though AAP and the increased push for a more business-like model measuring 'customer satisfaction' is considered to have led to more consultation and participation of affected populations, little progress seems to have been made on enabling affected populations to meaningfully engage in decision-making processes and structures regarding decisions that affect their lives. A review of the current state of affairs found that affected populations continue to be far from the centres of power[58] and AAP was the weakest performance area for humanitarian organisations.[59] Likewise, Hhumanitarian organisations themselves often have limited power in relation to their donors. Donors pay for the services that humanitarian organisations provide but affected populations do not pay their providers. Thus, the drivers and incentives of the humanitarian system create supply-side accountability to donors and to headquarters, which does not always align with meaningful accountability for outcomes in the countries where they operate.[60] Without donors allowing humanitarian organisations to invest time and resources in AAP, they are likely to prioritise securing funding over engaging with or implementing feedback from affected populations.[61] This imbalance of bargaining power makes it difficult for organisations to systematically adapt to feedback and address issues unless they match donor priorities. Furthermore, most humanitarian organisations have specific mandates and cannot satisfy all needs, which can lead to false expectations and distress among affected populations.

Engaging affected populations in a way that improves accountability is no easy task and organisations often consider comprehensive participatory approaches time-consuming, and thus not practical in emergency situations where urgent needs must be addressed quickly.

While aspiring to be bottom-up, in practice AAP has generally been based on top-down high-level donor commitments, and guidance and policy on AAP often takes humanitarian organisations as the starting point. There are few examples of demand-driven accountability initiated from affected populations.[62] Likewise, the academic literature reveals few studies which explore the degree to which affected populations can influence humanitarian programming or impact organisational learning. Reversely, humanitarian organisations often have a pre-defined rationalisation that might not match what is most important to affected populations.[63] One study showed that refugees who demanded a right

54   Austin, Brown, Knox Clarke, Wall (n 9).

55   Roberts (n 3) 2.

56   Chloë Whitley, Alyoscia D'Onofrio, Sheree Bennet, 'IRC Client Voice and Choice Initiative: Making the case and making the difference: Strategies to promote client responsive humanitarian aid' (2016) IRC <https://www.rescue.org/sites/default/files/document/926/160831cvcbriefingpaper-responsiveness-final.pdf> accessed 20 October 2018.

57   Ibid.

58   Austin, Brown, Knox Clarke, Wall (n 9).

59   Brown, Donini, Knox Clarke (n 33); 'Humanitarian Accountability Report' (2013) Humanitarian Accountability Partnership <www.alnap.org/system/files/content/resource/files/main/2013-har.pdf> accessed 15 October 2018; Ground Truth Solutions (n 40).

60   DuBois (n 30); Roberts (n 3) 4; International Rescue Committee 'Client Voice and Choice Initiative and Ground Truth Solutions pilot case study: Protection Programme Juba, South Sudan' (June 2016) 2 <www.rescue.org/sites/default/files/document/942/irccvc-gtpilots-casestudybprotectionandannexes.pdf> accessed 20 October 2018.

61   Roberts (n 3) 7–10.

62   Hilhorst (n 41) 108–109.

63   Roberts (n 3) 4–5.

to agenda-setting were met with repression by humanitarian agencies who labelled this 'politicisation'.[64] Similarly, another study showed that inputs were sought from refugees to support donor proposals and reporting, rather than for the purposes of adapting and improving programme quality.[65]

While most humanitarian actors remain committed to accountability as a virtue, organisations like Doctors Without Borders (MSF) continue to be critical of the 'one size fits all' approach. MSF questions the standard setting rhetoric, arguing that too much attention to standards can make humanitarian action technocratic and can fail to address ethical and political dimensions of humanitarian crises, such as creating safe environments, saving lives and monitoring and upholding respect for international humanitarian law.[66] It argues that humanitarian organisations should not be assessed on processes, i.e. number of people trained, and activities delivered, but rather on the impact of outcomes, i.e. number of lives saved.[67]

Accountability as a virtue is the most common approach adopted by humanitarian organisations, but such an approach makes them vulnerable to 'cosmetic compliance', since compliance is often self-monitored without any external oversight. Despite positive development from humanitarian organisations in putting more efforts into engaging with affected populations and establishing feedback and complaints mechanisms, it appears that it has not necessarily led to improved accountability to affected populations. For example, like other standards in the sector, the Core Humanitarian Standards remain voluntary and there is no punishment for non-compliance or incentive for compliance. Hence, while organisations can be well-intentioned, being associated with a standard could be seen as acting virtuously without addressing real accountability gaps.

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64   Elizabet Olivius, '(Un)governable subjects: The limits of refugee participation in the promotion of gender equality in humanitarian aid' (2013) Journal of Refugee Studies, Vol. 27, No. 1, 42–61, 57–60.

65   Whitley, D'Onofrio, Bennet (n 55) 2.

66   Fabien Dubuet, 'What is humanitarian accountability?' (2002) MSF <www.msf.fr/sites/default/files/2002-04-01-Dubuet.pdf> accessed 5 October 2018; Eric Stobbaerts, Nicolas de Torrente, 'MSF and accountability: From global buzzwords to specific solutions' (2008) Humanitarian Exchange Magazine 41, 46–49 <https://odihpn.org/magazine/msf-and-accountability-from-global-buzzwords-to-specific-solutions/> accessed 15 September 2019.

67   DuBois (n 9) 9.

5.   Conclusion

Humanitarian organisations operate in contexts where they must make difficult decisions about where, how and into whom they will invest their time and resources. Thus, humanitarian organisations are constantly responding to a variety of stakeholders and within multiple layers of accountability regulations. Dealing with multiple accountabilities can be a legitimate obstacle to improving accountability and organisations must know how to prioritise in order to achieve their accountability objectives. An organisation could be investing more time in engagement with affected populations but if it does not have the support from donors allowing it the resources or tools to address issues raised by affected populations or adapt programming accordingly, it can become a mere tick box exercise. Donors have focused more on standards and results frameworks for efficiency and best value for money rather than real outcomes for affected populations. Humanitarian organisations could therefore become better at identifying their own strengths and weaknesses when it comes accountability and prioritise their accountability relationships and efforts. This means being practical and honest about to whom and how they are accountable. Further, the context and conditions should inform decisions about what kind of accountability is desirable and appropriate. If humanitarian organisations and donors recognise the challenges and limitations of the system in which they operate, perhaps more realistic goals can be set for humanitarian accountability.

Most humanitarian accountability efforts have been focused on *accountability as a virtue*, where accountability is used as a normative concept, and a set of standards for virtuous behaviour or as a desirable state of affairs. This has led to investment in voluntary standards and procedures, such as the Core Humanitarian Standards, which are intended to make organisations more accountable. While major advancements have been made in standard setting, organisations have to evaluate their own success through self-reporting as there is no independent body addressing lack of compliance or situations of abuse. This means that these efforts have not been systematically accompanied by other forms of accountability such as external review or scrutiny. Considering the stark power imbalances and the lack of a formal accountability relationship between affected populations and humanitarian organisations, relying too heavily on accountability as a virtue can thus create unrealistic expectations for accountability to affected populations. Notwithstanding major advancements in accountability as a virtue, the literature suggests that humanitarian organisations continue to struggle to substantially improve accountability to affected populations.

Much less emphasis has been placed on *accountability as a mechanism*, where an organisation must justify their actions not in a void, but in a forum that can pass judgement. Outside of donor relationships there are few such mechanisms present to hold organisations accountable. This is partly due to the reluctance of humanitarian organisations to cede power, but also to the nature of the humanitarian system where organisations operate on a global scale across borders with no one regulatory body that can hold them to account. Engagement with affected populations, including complaints and feedback mechanisms which are today standard practice, is a major step forward for accountability. Nevertheless, the lack of trust in humanitarian organisations means affected populations remain reluctant to report discontent or abuse. This is partly due to power imbalances between them but also because of the lack of an independent body to receive and investigate such complaints.

Humanitarian accountability has in recent years often become synonymous with many other values like transparency, responsibility, inclusion and participation. Rather than being synonymous to accountability, these values should be seen as essential to achieve accountability. For example, allowing affected populations to engage through complaints and feedback mechanisms or other forms of engagement can be essential to achieve accountability but does not in itself necessarily constitute accountability to affected populations unless it is accompanied by other elements that can ensure enforcement and compliance. Research from social accountability work in fragile contexts suggests that approaches that combine different forms of accountability, for example allowing more external scrutiny to complement virtue accountability efforts, are more successful than those that only focus on one form.[68] If humanitarian organisations continue to focus all efforts on accountability as a virtue without simultaneously investing in other forms of accountability, they risk limiting the impact of such efforts. This is an area that has been little explored by humanitarian organisations and therefore there is room for further research and practical exploration by the humanitarian sector. Whether humanitarian accountability is considered to be successful will ultimately depend on how much those in power are willing to relinquish such power and what form of accountability we expect to achieve.

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68   Nixon, Buffardi, Wales, Pasanen (n 15) 14–15.

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