

Being Good at Doing Good?

**Review of Debates and Initiatives Concerning the Quality of
Humanitarian Assistance**

**Paper presented at the international working conference
Enhancing the Quality of Humanitarian Assistance**

12 October 2001, Netherlands Ministry of Foreign Affairs

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¹ Research for this paper was conducted jointly with Georg Frerks of Disaster Studies, and the paper owes a lot to his comments and insights. The assistance of Pauline Mulder with the interviews and the preparation of the paper were invaluable, and I thank Ann Long for the editing work of the English. Correspondence regarding this paper can be addressed to Thea.Hilhorst@alg.asnw.wau.nl

1. Introduction

In the explanatory notes to the 2001 Budget and in response to questions from Parliament the Netherlands' Minister for Development Cooperation announced that she intends to promote the enhancement of quality in humanitarian operations. How this could best be achieved was considered to be a matter for further deliberation and consultation with the different actors involved. Recognition was also given to some major initiatives already under way that addressed quality issues in humanitarian work. In this connection, the Humanitarian Aid Division of the Dutch Ministry of Foreign Affairs proposed an international working conference *'Enhancing the Quality of Humanitarian Assistance'* to look at the range of measures in operation or being designed or that still needed to be developed in order to improve and secure the quality of humanitarian work. This initiative was discussed and endorsed within the Utstein Framework - a periodic consultation between the Ministers for Development Cooperation of Germany, Norway, the UK and the Netherlands.

In order to base the conference on ongoing discussions and work, Disaster Studies at Wageningen University was asked to consult a number of relevant actors and write an issue paper in preparation for the conference. Apart from consultations with staff members in the Ministry, we have in the last few months interviewed people in humanitarian agencies and in agencies specifically addressing issues of (humanitarian) quality. A complete list of interviews can be found in Annex C. We are grateful for the generous way in which people shared their time, experiences and ideas for what seemed to some "yet another initiative around quality".²

If one thing has become clear from these discussions, it is that quality enhancement of humanitarian assistance is far from a technical task. It is interwoven with debates on politics of principles and people are intensely committed to the various outcomes these debates might have. It is a field of strongly competing truths, each with their own rationale and appeal, expressed with remarks such as:

- ... *"Humanitarian assistance is about life or death, we must be professional"*
- ... *"Humanitarian organisations can never answer for political failure"*
- ... *"NGOs are autonomous and should not be interfered with"*
- ... *"Accountability is a must, after all it is tax payers' money"*
- ... *"What matters is beneficiary participation"*

Instead of trying to identify *'the truth'*, this paper attempts to do justice to the diversity among humanitarian organisations and individuals. It takes stock of present discussions, initiatives, and of the questions raised with regard to the quality of humanitarian assistance. It intends to serve as an input for the discussions at the international working conference and hopes to contribute to whatever follow-up may be decided upon there.

² To avoid misquotation or breaching confidentiality, references are only to written texts and not to individual interviews. Queries about sources can be addressed to the author.

2. Background to the quality discussion

Ever since Henri Dunant witnessed the Battle of Solferino in 1859, there have been currents and undercurrents of debate on the responsibilities and qualities of humanitarian assistance. During the 1990s these swelled into a cascade of discussions, publications, and initiatives, especially after the Rwanda crisis in 1994. The interagency evaluation held the year after sadly concluded that, once political failure led to the crisis, many more lives could have been saved had humanitarian organisations better co-ordinated and acted more professionally. The discussions on the quality of humanitarian action were related to the proliferation of humanitarian principles, to an increasing critique of humanitarian organisations, and to increasing ambiguities on the question what constitutes humanitarian action.

The proliferation of humanitarian principles

The heightened concern for issues of quality stems partly from (and found further expression through) a proliferation of and discussion around humanitarian principles. Humanitarian principles may be considered the basis of any definition of quality of humanitarian assistance.

It is important to note that the term ‘humanitarian principles’ refers to moral principles to mitigate the destructive impact of war, but is also used - as is the case here - to refer to principles of humanitarian action. Principles of humanitarian action are *derived* from international humanitarian law but are not *integral* to the conventions that regulate warfare³. Humanitarianism started with the Geneva Convention of 1864 and recognition of the International Committee of the Red (ICRC). The Convention was meant to regulate the typical wars of the time, namely, those between the armies of competing nation-states. After the Second World War, with its massive abuse of humanitarian ideals, three more Geneva Conventions elaborated the rules of war. Through the Geneva Conventions, belligerent parties are obliged to provide access for humanitarian assistance. ICRC was given this space to operate on the condition that it remained *neutral* and *impartial*. The latter became two major humanitarian principles⁴.

Conflicts in the last two decades have often made a mockery of international humanitarian law. They are mostly intra-state in nature and occur in societies where the legitimacy of the state is low or even completely lacking, at least in the eyes of some of the groups in the society. The civil population is often the direct target group of violence and accounts for 90% of all victims, while warfare is spread over a large area and fragmented in nature. The characteristics and status of belligerents are hard to define, and they are difficult to hold accountable for their obligations according to humanitarian law, increasingly turning humanitarian action into a *'mission impossible'*. Where international conventions hardly apply, humanitarian organisations have had to

³ Leader, N. (1998) *Proliferating Principles or How to Sup with the Devil Without Getting Eaten*, ECHO/ODI Conference: Principled Aid in an Unprincipled World: Relief, War and Humanitarian Principles.

⁴ Leader, N. (2000) *The Politics of Principle: the principles of humanitarian action in practice*. HPG Report 2, Overseas Development Institute, page 12.

reconsider their missions, and they have become more diversified in the principles they hold and in the interpretation of those principles they continue to share⁵.

In addition, we might say that humanitarian action has become more ambitious in taking on board more and more principles, setting increasing numbers of parameters for quality. On the basis of a survey among humanitarian organisations, Minear and Weiss identified eight widely shared principles. Apart from the so-called classic principles, like neutrality and impartiality, humanitarian organisations had come to adopt a new generation of principles including accountability and the need for appropriateness and contextualisation⁶. Humanitarian action has to different degrees also become guided by additional, but not always equally compatible, sets of principles such as human rights, justice (directed to fair and equal relationships), sustainable development, and conflict prevention and peace building. This proliferation of principles was partly transmitted from the field of development, partly imposed by public pressure, but mainly followed from lessons learned from the humanitarian experience. The principles reflect increasing concern about the effectiveness and impact of aid. Rather than resolving humanitarian crises, humanitarian action is thought liable to be part of the problem by feeding into the economies of war, acting as a diversion of political solutions or by undermining people's coping and livelihood capacities. Concerned about the impact of their work, humanitarian organisations have to different degrees expanded their explicit or implicit goals far beyond the immediate alleviation of human suffering.

The proliferation of principles leads to contestation over what constitutes good humanitarian practice. One field of contestation is the interpretation of the principle of neutrality, where three different positions can be identified. The first is *neutrality elevated*, which sees humanitarian action for the relief of suffering only, emphasises universal legal principles and propagates strict adherence to the rules of impartiality and neutrality. The second is *neutrality abandoned*, a position which argues that humanitarian action should be subordinated to (good) political goals, partisan if necessary, in order to reduce suffering in the long run. Then there is a *third-way humanitarianism*, which stresses the role of humanitarian aid for development relief, peace building and dealing with root causes, without taking political sides⁷. These three different positions imply different strategies for humanitarian action.

Another field of contestation with a long pedigree concerns the nature of humanitarian actions⁸. The first view rests on the idea of the *humanitarian imperative*, stipulating that humans suffering life-threatening circumstances have the *right* to protection and assistance. The humanitarian system, as a consequence, has the obligation to deliver quality protection and assistance. On the other hand, there are those who emphasise the *esprit humanitaire*. This is the expression of the idea that humanitarian action is voluntary. Humanitarian crises, in this view, are the results of political failure, in

⁵ Leader, N. (2000), op cit.

⁶ Minear, L. and T.G. Weiss (1993), *Humanitarian Action in times of war: A handbook for practitioners*. London: Lynne Rienne Publishers.

⁷ Leader, N. (2000) op cit.

⁸ Macrae J. (1996) *The origins of unease: setting the context of current ethical debates*. Dublin. Non-governmental organisations forum: Ethics in Humanitarian Aid.

particular the lack of adherence to international humanitarian law. Humanitarian assistance, then, is not an answer to the crisis, but a civil response triggered by the humanitarian impulse to alleviate human suffering. These different views imply different positions regarding the responsibilities of humanitarian organisations, in particular the question of whether humanitarian organisations have an implicit contract with beneficiaries with obligations that they must be accountable for.

Critique of humanitarian organisations

Another impulse to the current interest in quality issues is formed by increasingly critical questions about the performance and accountability of humanitarian agencies. The number of these agencies has dramatically increased, and so has the size of their operations. Such agencies have branched out due to the proliferation of principled concerns, starting with the formation of Médecins Sans Frontières (MSF) during the Biafra crisis in 1971 as an offshoot of the International Committee of the Red Cross (ICRC). There has also been a mushrooming of organisations since the early 1990s, when humanitarian crises increased, due both to conflicts and to disasters triggered by natural hazards. Budgets for humanitarian assistance began to rise since the mid-1980s. DAC donors' budgets rose from US\$600 million in 1985 to over a billion in 1990, to 3.5 billion in 1994. After 1994 it started to decline again and in 1998 it stood at 2.8 billion, then, mainly because of the Balkan crisis, it increased to 4.4 billion in 1999⁹.

The increase in humanitarian activity has in the first place led to mounting confusion on what constitute humanitarian organisations. A large diversity of organisations has taken on humanitarian programmes, or at least present themselves as such. These range from 'pure' humanitarian NGOs to development organisations taking on this additional aspect, to all kinds of organisations that have no clear history but jump on the bandwagon. Among these, one may find organisations that take on a humanitarian identity to disguise a political agenda or an interest to make profit from humanitarian action. One may also find good-willing individuals who have a humanitarian motivation but no expertise in delivering the acquired services. Without clear criteria of what constitutes humanitarian organisations, it is hard to distinguish good from bad organisations.

In the second place, there have been increasing allegations that humanitarian organisations are competitive over funding, media exposure and even beneficiaries and that they are also unaccountable, especially towards their beneficiaries. Furthermore, it has been argued that humanitarian organisations are disinclined to co-ordinate their activities. This concern was particularly heightened by the Kosovo crisis, which was called a "circus where the international community was arguing over institutional self-interests while at the same time telling the Kosovars to live harmoniously together"¹⁰. Of course, there are large differences among organisations in the extent to which they fit this bill. Humanitarian action is given by a mixture of organisations and there is concern that the better organisations may be damaged (in work or image) by less professional, unethical or fraudulent NGOs, or by organisations that intentionally or unintentionally meddle in political, ethnic or religious conflicts. This provides one of

⁹ World Disaster Report (1999) and World Disaster Report (2001), International Federation of Red Cross and Red Crescent Societies.

¹⁰Brabant, K. van (2000) Regaining Perspective: The Debate over Quality Assurance and Accountability, *Humanitarian Exchange*, no. 17, page 23.

the motivations from within humanitarian organisations to seek measures to enhance the quality of humanitarian assistance on a sector-wide basis.

What constitutes humanitarian action?

This paper concerns humanitarian action in the sense of preventing and alleviating human suffering by providing care and assistance. As was discussed above, this classical notion of humanitarian action has in recent decades for many organisations come to include the provision of rehabilitation and development, and/ or activities for conflict resolution and peace building. However, in the last years, humanitarian action has attained an additional meaning in a military sense. During the Kosovo crisis in particular, NATO bombing was presented and legitimized as a *humanitarian* intervention. This understanding of humanitarian action, as causing suffering and destruction in order to prevent further suffering, has evoked ambiguity regarding the definition of humanitarian action, especially in 'recipient' countries and has led to increased discussion regarding the question of what is good humanitarian assistance¹¹. Although the questions raised by humanitarian (military) interventions fall outside the scope of this paper, they form an important background to the discussion.

Quality politics

It can be concluded from these recent developments, discussions on the issue of quality are highly political in nature. Two kinds of politics are at stake and intertwine, where controversies over principled politics get entangled with more mundane organisational politicking and rivalry.

Although the discussion on the quality of humanitarian assistance has focused mainly on the implementing humanitarian organisations, it is important to note that they are certainly not the only ones responsible for the quality of humanitarian assistance. The humanitarian complex is composed of many other actors that all have an impact on the quality of assistance. Among them are foreign policy actors, donors, United Nations organisations, peacekeeping forces, the media, and a range of local institutions. Although many of the arguments (and additional) raised against NGOs sometimes apply more to these other actors, this is outside the scope of this paper. I shall return to this point, however, in the section on quality and accountability.

¹¹ Apthorpe, Raymond (2001). *Was International Emergency relief Aid in Kosovo 1999-2000 humanitarian or not?* Paper presented at a conference in Stockholm (reference: apthorpe@lycos.com)

3. Four approaches to the quality of humanitarian assistance

There are four emerging traditions in approaching the issue of quality of humanitarian assistance.

The organisational management approach

Humanitarian organisations are increasingly adopting notions and instruments of quality enhancement that originate from business and industry. The best known of these is the International Organisation for Standardisation (ISO), where ISO 9001 and 9002 provide a comprehensive model for quality assurance, derived from British standardisation initiatives. It has attained recognition as an internationally agreed set of standards for the development and operation of a Quality Management System. It defines quality as all those characteristics of an entity that bear on its ability to satisfy stated and implied needs¹². With the ISO, organisations submit themselves to developing a set of procedures, mainly focused on finance and the project cycle, and design mechanisms to make their performance transparent and accountable. Apart from the ISO, there are numerous other quality systems, some of them developed specifically for the voluntary or health sector. A number of these have been adopted by different humanitarian organisations, most notably the Excellence Model developed by the European Foundation for Quality Management¹³. In the US, 160 private relief, development and refugee assistance agencies form InterAction, a coalition that developed the Private Voluntary Organizations Standards (PVO standards) ensuring accountability to donors, professional competence and quality of service.

Quality systems emphasise different philosophies. Many focus on process and rest on the assumption that investing in better decision-making and management procedures will result in better performance or output. Others emphasise quality as an *attitude*, as always on the horizon: never to be achieved (total quality) but something to be always headed for¹⁴. This idea of continuous improvement resonates nicely with the idea of learning organisations, that has become increasingly popular in the field of humanitarian assistance, through the work of ALNAP¹⁵ among others.

The upsurge of quality management systems in development and humanitarian organisations partly follows from a political and public climate that increasingly demands transparency and accountability from these organisations. It also results from the management needs imposed by the larger scale of organisations and humanitarian

¹² Griekspoor, A. (2000) *From doing good to doing good things right. An analysis on the applicability of the EFQM model for Quality Management to Humanitarian Organisations*. Final paper as part of the Masters of Public Health Program of the Netherlands School of Public Health, Utrecht, page 10.

¹³ Griekspoor, A. and Sondorp, E. (forthcoming), 'Enhancing the Quality of Humanitarian Assistance: Taking Stock and Future Initiatives', *Journal for Pre-hospital and Disaster Medicine*, page 8. See also Borton, J. (2001) *The 'Quality Revolution' and Some Reflections on What the Humanitarian Sector Might Learn From It*. Paper for presentation at the workshop on 'Quality in Humanitarian Aid' Göttingen 28-30th September 2001.

¹⁴ Slim, H. (1999) *Future Imperatives? Quality, Standards and Human Rights. Report of a Study to Explore Quality Standards for the British Overseas Aid Group (BOAG)*. Centre for Development and Emergency Practice (CENDEP). Oxford: Brookes University, page 23.

¹⁵ Active Learning Network for Accountability and Performance in Humanitarian Action, see annex A.

operations, as well as from changes in organisational set-ups, notably the increased tendency to work with local partner organisations, and from agency globalisation or the formation of 'organisational families'. These changes have reinforced the demand for harmonisation and standardisation to ensure coherent operations¹⁶. Finally, the adoption of quality management systems can be considered conditional to enhancing funding arrangements beyond support for separate projects. Partnership agreements where organisations receive a block grant upon approval of their year plans and budgets, which can then be allocated to specific projects to be accounted for retrospectively at the year's end, has gained some prominence in the UK. The Netherlands has such partnership agreements with a number of co-financing agencies and several agencies of the United Nations.

Quality management systems have often been considered overly managerial, and lacking in substance. A shorthand for their approach might read: *"say what you do, do what you say, and show that you do what you say"*. However, there seems to be a recent trend to develop the systems beyond this adage, by incorporating such questions as *"do organisations do the right things considering their objectives?"* and *"do stakeholders consider that organisations do the right things?"*. Nevertheless, some observers question whether quality management systems that do not discriminate between the requirements for managing a biscuit factory, a ballet dance group or a humanitarian operation are not too blunt an instrument to be appropriate, especially since they seem premised on predictable situations with predictable problems and a consensus on what to do. This notion fits with a recent trend in quality management thinking that is more inspired by chaos theory than predictability. In this line of thinking, the complex situations in which humanitarian operations take place would be better served by innovative responses guided by simple rules, such as *"keep abreast of developments in your field, adapt these to the situation and do no harm"*¹⁷. This suggestion has not been developed in humanitarian organisations, but seems worthwhile to explore.

On a positive note, quality management systems are considered to lead to more beneficiary consultation and participation, given the high premium put on 'customer satisfaction'. On the other hand, there is concern that the introduction of the same systems with local partner organisations may, if not done through a meaningful and thoroughly participatory process, lead to the imposition of yet another Western discourse. Although some find such considerations of lesser importance than the obligation to ensure quality in humanitarian assistance, their ethical and political ramifications may be substantial, as real or perceived impositions of external systems may easily provoke resentment or resistance.

The rights approach

The second approach to quality is grounded in international human rights standards. Although human rights standards emerged in 1948, they only entered into development and humanitarian practice in the 1990s. Rights-based development is considered the new paradigm for development. Human rights standards are different from business standards because they do not dictate everyday practice but have an aspirational

¹⁶ Slim, H. op cit., page 31.

¹⁷ Griekspoor, A. and E. Sondorp, op cit., page 6.

undertone. In addition, standards based on human rights not only conceptualise the ends and means of development, but also stipulate operational principles of practice, in particular participation¹⁸.

For humanitarian assistance, the rights-based approach is epitomised by the Sphere standards, which set minimum, universal standards that disaster-affected people are entitled to. The Sphere standards focus on five key areas of assistance (food aid, nutrition, health, water supply and sanitation, shelter and site planning). They cover both quantitative product standards and qualitative process standards, for instance regarding participation.

The rights-based approach is commended for offering an agenda for development that breaks away from earlier patronising paradigms. A number of humanitarian organisations, however, consider it irrelevant to humanitarian action. With reference to the notion of humanitarian *spirit*, these organisations do not agree that humanitarian organisations (not being government and being voluntary) can have an *obligation* to fulfil people's rights. Not only would it be erroneous, but it would also divert attention away from addressing the political failures underlying the humanitarian situation.

The contingency approach

The third approach to quality assistance may be called the contingency approach. This approach is based on the notion that the quality of humanitarian assistance is contingent upon the complexities of the situation in which it is given and the network of other actors involved. It has recently been explicitly formulated by the NGO Platform for a Different Quality Approach to Humanitarian Action. The contingency approach starts from the notion of diversity. It stipulates that humanitarian action must be adjusted to take account of the contingencies and vicissitudes posed by different types of disaster, countries and cultures, and diversity among aid recipients. The victims are not considered as “mere recipients of aid” but as socially differentiated, economically heterogeneous and often politically motivated actors. Humanitarian action, in this view, must be grounded in situational analysis. It would also have to be adjusted to an assessment of how the crisis will evolve, i.e. whether it is expected to be of short or long duration. Rather than relying on standards, staff should be equipped to understand the complexities they are confronted with¹⁹.

The ownership approach

The ownership approach emphasises participation and ownership. Quality, in this approach, is a negotiated concept that ideally should be formulated in a bottom-up rather than a top-down fashion. The approach is associated with third-way humanitarianism and focuses on fostering local capacities for peace, disaster preparedness, aid and development. It can be found among organisations that work both in development and in relief. It was also expressed by one interviewee from a humanitarian organisation, who had started to shift to capacity building after years of lessons learned with relief programs that did not, in his eyes, contribute to strengthening the local society. More significantly, the approach has begun to be

¹⁸ Slim, H. op. Cit, see also the work of Bas de Gaay Fortman

¹⁹ Grünewald, F. *About the Quality Platform and the Quality Project*, copy made available by the author.

propagated by representatives from humanitarian agencies that are based in those countries where humanitarian crises have occurred and the benefits and unintended consequences of humanitarian actions are felt. A representative of an African NGO recently charged that: "Many programmes are formulated in foreign offices instead of being built around local realities and so fail to respond to real needs. Root causes are ignored as programmes neither reduce poverty nor prevent conflict. In this context, African NGOs have become little more than subcontractors supplying cheap labour for project-based aid. Capacity-building, to the extent that it occurs, rarely aims for more than building a better sub-contractor: more transparent, more accountable; in sum, a more reliable recipient of aid funds"²⁰.

How different are the approaches?

The four approaches sketched out can all provide a definition of what distinguishes good from bad humanitarian actions and organisations. That does not mean that they are mutually excluding or incompatible. Beneficiary participation, for instance, is important in every notion of quality, as a vehicle for consumer satisfaction, a human right, or an aspect of making situational analysis. Yet, only in the ownership approach it has central importance. The same applies for standards, management systems or context analysis. Each of these approaches is comprehensive and incorporates to some or more extent the other approaches. Quality management explicitly encompasses the other foci, but the question is how feasible this is in practice.

The difference between the approaches thus becomes a difference of language, priority and emphasis. Nonetheless these are important distinctions. The different approaches are all based on different rationales that imply different strategies, organisational styles and cultures, practices and performance, and ideas about quality and accountability. With the limited resources, people and time constraints that humanitarian organisations have to deal with, the differences may become more prominent. To illustrate this with a simple example: if an organisation has time and space to give one training to a counterpart organisation it makes a difference whether it is chosen to concentrate this training on decision making models and administrative procedures, on the importance of humanitarian law, on a critical reflection of the crisis situation, or on an invitation to reconsider jointly the policies of the head office.

²⁰ Dawit Zawde (2001) Africa Humanitarian Action, *TALK BACK* The Newsletter of the International Council of Voluntary Agencies (ICVA), Volume 3-4.

4. The use of standards

Standards are important because they are implicit in every reference to quality and accountability. Recently, there has been a lot of discussion over the use of standards, which has mainly focused on the above-mentioned Sphere standards. Nonetheless, it is important to note that the use of standards is much broader than Sphere²¹. Individual agencies and agency families or councils have elaborate manuals, policies and instructions regarding a large range of aspects of their work. Interagency initiatives include the Code of Conduct, the People in Aid Code of best practice in the management and support for aid personnel, and country specific co-ordination and operation arrangements, such as the Sudan ground rules, or the joint policy of operations in Liberia. United Nations and the DAC-OECD²² have issued guidelines on working with refugees and working in conflict. Finally, independent foundations have developed normative frameworks varying from systems for early warning to the Local Capacities for Peace Project (Do No Harm). The present discussion focuses on possible abuse of standards and the concern that they stifle innovation.

Are standards too prone to abuse?

Much of the debate regarding standards concerns their possible political abuse and misuse by governments, NGOs and other actors. Firstly, it is feared that undue attention to standards turns humanitarian action into a technocratic endeavour at the expense of addressing ethical and political dimensions of responding to humanitarian crises. Secondly, when standards are made conditional, they infringe on the independence of NGOs, and may facilitate the abuse of humanitarian assistance for foreign policy. Thirdly, when the adoption of standards is conditional to making funding available, this may lead to a humanitarian establishment that is inaccessible to new organisations or closed to organisations that do not meet the institutional requirements (mainly Southern and Eastern). Fourthly, standards may be abused to disqualify local products for relief, even though these are up to local standards, and instead rely on imported goods. Proponents of standards, on the other hand, share these concerns, but they find the risk of abuse is no reason to abandon standards altogether, given the potential contribution they have for the enhancement of the quality of humanitarian action.

Are standards too rigid?

A different set of problems with standards concerns the risk they bring of inertia and rigidity. Firstly, standards may lead to mechanistic implementation and become (expensive) objectives in and of themselves rather than a means to improve practice. Secondly, some people are concerned that standards tend to multiply until they become ineffective, and that obsolete standards continue to linger in organisational practice. Thirdly, it is feared that standards stifle creativity and improvising skills. This is all the more problematic considering that the accessibility, conditions, and funding are often not favourable to meeting standards. The way standards are developed does not usually include guidelines on how to adjust them in practice when they cannot be met. For

²¹ Stockton, N. (2000) *The Search for Standards and Accountability in Emergency Relief Operations*, IDS, Speaking Notes.

instance, how thinly can one spread resources when the number of people in need far exceeds the available supplemental food?²³ This set of problems brings forward the challenge of how to make good standards, i.e. standards that enhance the capacity of people to adjust and adapt in specific situations, and standards that invite adjustment or removal when they have lost their relevance.

The problematic use of standards in poor host environments

A final concern is that related to the use of standards in poor host environments. The largest majority of refugees are received in the disaster region itself, often in the least developed countries in the world. In many cases, refugees are directed to the poorest, less fertile and remote, rural areas where host populations live under very fragile and marginal conditions. Relief given to refugees and the basic facilities and services provided to them, often surpass the levels that the host population enjoys, leading to perceived and real inequities and injustices. To use minimum quality standards for refugees, while not applying them to the host environment, may create imbalances and, in the end, undermine the preparedness of local populations to host refugees. On the other hand, it may be utterly unrealistic to expect that the application of minimum standards to local populations as well will be affordable and sustainable. Though the care for host environments may not be considered part of the humanitarian mandate, it is evident that the issue has important political and policy implications for the host government as well as the wider development community.

The status of standards

The concerns about abuse and rigidity are partly related to the *status* attached to standards. Dictionary-wise standards, in order to be standards, are meant to be *set*, *met*, and *checked*. In relation to humanitarian assistance, this obvious property is under discussion. While there are always standards, and everybody seems to agree they can be set, whether they should be subsequently met is questioned and, especially, whether they should be checked. More than on their content, concerns focus on the status attached to them. Should they be absolute or relative? Should they be imposed or voluntary? Should they be subject to external accountability or met and checked within the organisations only?

Much of the controversy regarding the Sphere standards is about whether they are absolute standards that lay down people's rights, or aspirational objectives one should always try to achieve? Or, as a third alternative, do they merely provide a common language, a vocabulary in which humanitarian action can be discussed and a benchmark against which objectives and performance can be explained? Although Sphere speaks of minimum standards, the project also emphasises that working with the standards is a learning process²⁴. According to our interviews, organisations using the standards tend to regard them as aspirational. The Sphere project also emphasises the voluntary nature,

²² Development Assistance Committee of the Organisation for Economic Co-operation and Development

²³ Griekspoor, A. (1998) *No Standards without Deviation. A debate on the 'Sphere' minimum standards for humanitarian assistance based on an internal evaluation of 'Médecins sans Frontières Holland's' response to the famine in Sudan*. Griekspoor, A and C. Collins (2001). *Raising Standards in Emergency Relief: How Useful are Sphere Minimum Standards for Humanitarian Assistance?* BMJ 2001;323:740-2.

²⁴ Lowrie, S. (2000) Sphere at the End of Phase II. *Humanitarian Exchange*, no. 17.

and has no mechanisms by which it can monitor compliance²⁵. On the other hand, occasional suggestions have been made to turn Sphere into legislation or into a condition for funding (see also paragraph 6).

The more status is attached to standards the more effective they may become in the eyes of proponents, and the more liable to political abuse and rigidity in the eyes of opponents.

²⁵ Lowrie, S. (2000) *op cit*.

5. Quality and accountability

Quality and accountability are interlinked but do not automatically go hand-in-hand. NGO accountability is often defined as "the means by which individuals and organisations report to a recognised authority, or authorities, and are held responsible for their actions"²⁶. In order to be accountable, organisations have a duty to be *transparent*, i.e. to account to their stakeholders, to be *responsive*, i.e. to take responsibility for their acts and omissions, and to be *compliant*, i.e. to comply with agreed standards regarding both organisational policies and practices, and the reporting of policies and performance. Accountability, in this view, requires agreement on clear roles and responsibilities, and a set of agreed standards of performance or at least a set of clear objectives against which performance can be measured.

It is often claimed of late, that NGOs are not accountable. Upon scrutiny, this claim boils down to a complaint that NGOs lack transparency in their external accountability relations. It is important to note, however, that there are other forms of accountability too. In the first place, quality enhancement measures taken by humanitarian organisations often increase *internal* accountability. This ranges from monitoring compliance to operational guidelines and policies, to the implementation of the lessons learned. Judging from interview results, the increase in manuals and guidelines and reporting mechanisms, from the attention for evaluation and monitoring and from investment in human resource development, such quality enhancement is gaining momentum. Just to mention one of many examples, the IFRC has commenced a project in which national Red Cross/Red Crescent societies identify their strengths and weaknesses, and design, implement and report on improvement measures. In order to maximise the space for candidness and learning, these reports are treated as confidential. Many organisations keep evaluations internal in order to avoid out-of-context media exposure of findings that may undermine public support for the organisation or for humanitarian action in general²⁷.

In the second place, external accountability also takes place outside formal channels. This can take many forms, including responsiveness to public pressure and media reporting; engagement in public debate; responding to feedback from beneficiaries; informal consultations with local populations, other humanitarian organisations, peacekeepers and belligerents; silent diplomacy; socialising with local government officials; and the removal of personnel or management when complaints are received. These forms of accountability may not be without problems: because they may not be transparent (at least not to all stakeholders), their political ramifications cannot be checked, and NGOs may respond to undue pressures. But they are operative and often

²⁶ Edwards, M. and Hulme, D. (1996) *Beyond the Magic Bullet. NGO Performance and Accountability in the Post-Cold war World*. Connecticut, Kumarian Press, page 8.

²⁷ The wisdom of this practice may be questioned in light of the recent experiences in UNHCR. This organisation has decided to put all evaluations on the internet which so far seem to have had a positive impact on the credibility of the organisation rather than having a negative impact. See: Crisp, J. (2000) Thinking outside the box: evaluation and humanitarian action. *Forced Migration Review*, nr. 8.

they are very effective, efficient and sensitive to security issues²⁸. Finding no formal external accountability systems in place does not warrant, then, the conclusion that NGOs are not accountable.

Complexities of accountability

Nonetheless, compelling reasons are given for why transparent external accountability is a concern for humanitarian organisations. In the first place, several people turn the question of why NGOs should be accountable around by asking why should they not? Considering that humanitarian organisations challenge political actors to be accountable, why should they themselves be made an exception? In the second place, it is suggested that, in view of increasing public pressure, NGOs had better get their own house in order before someone else does it for them. In the third place, it is suggested that increasing external accountability should be seen as an additional opportunity for learning and improving, and hence to contributing to more effective humanitarian assistance.

As the importance of external accountability rises higher on the agenda of humanitarian organisations and their stakeholders, it is important to remain aware of the complexities involved. Accountability is not a quick fix to possible problems. If it is to amount to more than a simple add-on to organisational rituals, or a ready stick to use against organisations that for one reason or another have evoked resentment among stakeholders, then the complexities are considerable. One major complication is how to accommodate situational factors, such as how to translate roles and responsibilities in particular humanitarian crises, and how to define to what extent standards could be met in a given situation. As someone remarked in the Ministry: "There are always situations that one has to take account of. Even with such a straightforward matter as timely reporting, an office can be raided and that is that". Moreover, even when abiding by the same standards, NGOs may embark on radically different strategies when facing the same or similar situation depending on their interpretation of it.

Another major difficulty is the number of stakeholders involved with humanitarian organisations and the complex relations that evolve around them as well as the often-conflicting demands they make on NGOs. In the case of donor organisations, the accountability relation is relatively simple given that there is a contract specifying obligations and that donors have a clear exit option when these are not met. In comparison, the relation with beneficiaries, to whom NGOs should primarily be accountable, is much more confused. There is no contract with agreed standards. Local people may not have effective mechanisms for representation, are not homogeneous in their expectations and often lack recourse to appeal if these are not being met. For accountability to be effective, 'authorities' need to have either a *voice* (to enforce change in the desired direction) or an *exit* (to sever the relation)²⁹. In practice, beneficiaries often have neither. The picture is further complicated when taking into account other stakeholders and the nature of different obligations. These vary from

²⁸ Hilhorst, D. (forthcoming) *Discourse, diversity and development. The real world of NGOs*. Zed Books.

²⁹ Hirschmann, A.O. (1970) *Exit, Voice and Loyalty: Responses to Decline in Firms, Organizations and States*. Cambridge, MA: Harvard University Press.

legal requirements of local governments to duties following from co-ordination agreements.

Accountability beyond humanitarian organisations

It is even more difficult to address the issue of accountability beyond the level of humanitarian organisations to include all actors that have a bearing on the quality of assistance. For NGOs to deliver good humanitarian assistance, they need access, resources and protection for themselves and their beneficiaries. Furthermore, political solutions are needed to resolve humanitarian crises. Donor governments, international government organisations, the United Nations, peace-keeping operations, local governments (if any) and institutions, and belligerents, all have roles and responsibilities in determining the quality of assistance. Conceptualising and experimenting with these other accountabilities are less advanced than is the case with NGO accountability. It is obvious, however, that, again, the complexities are many. Roles and responsibilities are not just unclear (and needing clarification), they are interwoven with all kinds of political interests. Governments, for instance, have an important role to play in pursuing humanitarian politics, i.e. the resolution of humanitarian crises by resolving conflict or reducing vulnerability to natural hazards and ensuring access, resources and protection for assistance. In practice, however, the line between humanitarian politics and foreign policy is thin, further complicating accountability in this respect³⁰. Donor accountability has received more attention as of late: the Code of Conduct (see Annexe B) stipulates roles of donor governments and several initiatives have been taken to define principles of good donorship³¹. It is increasingly common that donors have instituted mechanisms to maintain dialogue with NGOs on a regular basis regarding humanitarian politics and assistance. One of the difficulties is that in the mutual accountability relation between NGOs and donors, NGOs have less space to comply. As one of the Dutch NGO interviewees remarked: "It is easy to find people in the Ministry agree on the principles of assistance, including the need for capacity building and embeddedness, but when it comes to defining the terms of a programme, they don't want to fund activities along those lines".

Accountability system or culture?

It has been suggested that efforts to improve NGO quality and accountability would have some spin-off for the other accountability relations, starting with donor accountability. The Sphere standards, for example, could be used to negotiate the terms for resourcing humanitarian programmes. This means that donors would have to make adherence to these standards a precondition for funding, and thus at the same time take upon themselves a commitment to supply the resources necessary to uphold the standards. In a similar vein, it has been suggested that ensuring NGO accountability will finally lead to a system of accountability spanning the entire humanitarian

³⁰ Leader, N. (2000) op cit.

³¹ The new co-financing arrangement in the Netherlands, for instance, gives a number of parameters for good donorship, including avoid bureaucratic systems that hinder strategic and effective performance; consult Southern stakeholders, balance continuity and flexibility, and avoid output financing but incorporate funding in the financing of organisational development, capacity-building, and linking and learning.

system³². Given the complications elaborated above, this notion may be too detached from the everyday realities of humanitarian assistance. There is no humanitarian *system* in the sense of an assembly of parts that fit together and feed each other with complementary roles and responsibilities. Rather, one faces a humanitarian *complex* consisting of shifting actors, diffuse boundaries, partly conflicting interests and values, and a high diversity of relations, organisational forms and work styles. The same dynamics that render humanitarian assistance problematic enter into accountability processes. As a consequence, accountability is liable to become just as complicated and prone to power relations and politics as the 'real' thing³³.

Although it is not feasible to consider an all-encompassing accountability system, it remains worthwhile to institutionalise different accountability mechanisms. None of these in themselves will provide the ultimate accountability cure. Instead of an accountability system, this would entail the fostering of an accountability *culture*. Such a culture would not depend on one single form and format of accountability but constantly seek to maximise a diversity of accountability processes.

³² Raynard, P. *Mapping Accountability in Humanitarian Assistance*, Discussion Paper for ALNAP Meeting on 6th April, page 20.

³³ Hilhorst, D. (forthcoming) op cit.

6. Methods to enhance quality and accountability.

This paragraph discusses a number of quality-enhancing measures for humanitarian assistance. Given the magnitude of possible measures, the list is not exhaustive. Moreover, the focus is on measures combining quality and external accountability. Internal quality management systems, human resource development activities, communication techniques, and other management tools are thus not dealt with here.

Beneficiary participation and accountability

There appears to be much less experimentation, implementation and documentation of beneficiary participation than would be expected on the basis of the widely proclaimed importance of this issue³⁴. One reason cited for this is the emergency character of humanitarian assistance. However, this argument is not so convincing since most humanitarian action takes place after the immediate crisis is over. Beneficiary participation and accountability is more than a right to be obliged. It can unveil some problems in humanitarian action, regarding needs assessments, performance, relationships and impact, and ensure a better articulation of humanitarian aid with local coping capacities³⁵. Points raised for discussion include:

- The need to continue mapping the diversity of culturally appropriate forms of accountability processes emerging from the ground. There are probably more forms than at present assumed.
- Participation is no panacea and it is important to take into account its pitfalls and complexities. Participation is liable to follow socio-economic differentiation, ethnic, religious and political differences, and gendered patterns that occur in society and are often part themselves of the humanitarian problem. In addition, the security implications of participation should be monitored.
- What is the status of participation? Is it merely consultation, or is there real responsiveness and compliance to accountability processes with beneficiaries?
- Participation in issues beyond programme level, including the definition of quality of humanitarian assistance probably needs attention.
- In relation to refugees, participation and accountability to the host population living with and around them may be equally relevant.

Complaint handling

Complaint handling is a special form of beneficiary accountability. It has been used in NGO contexts, for instance by the Australian Council for Overseas Aid. The main initiative in the humanitarian sector has been the Humanitarian Ombudsman Project. This project aimed to develop a system-wide ombudsman that used the Red Cross/Red Crescent NGO Code of Conduct, the Humanitarian Charter and the Sphere Standards as references to raise and address the concerns of people affected by disaster and conflict. This initiative faced significant opposition because its legitimacy and feasibility was questioned, and because of concern for possible unintended and negative consequences.

³⁴ Callamard, A. (2001) *Humanitarian Accountability: Reflections and Framework – Work in Progress*, Humanitarian Accountability Project.

³⁵ HAP briefings 4, Humanitarian Accountability Project.

Recently, when entering its third phase, the project was re-baptised as the Humanitarian Accountability Project, and the ambition to develop a mandate to address complaints about the compliance with humanitarian principles was abandoned. Experiences with complaint handling suggest that it is difficult to operate an effective system because these mechanisms often receive only a very limited number of complaints compared to the problems encountered in the field.

- This leaves open, for the moment, the questions of where (intended) beneficiaries might report misconduct, abuse and incidents, who is responsible for investigating and following up these reports, and whether or not humanitarian workers can and should be held liable for abuse.

Participation and accountability towards local partner organisations

Participation and accountability to others working in the field of humanitarian action has also received attention, in particular through the 'People in Aid' project. One of the seven principles constituting the People in Aid Code stipulates that 'We consult our field staff when we develop human resource policy'. Questions of participation and accountability of local humanitarian organisations, be they local implementing partners, 'family' or 'Federation' members, field offices, or local divisions of international organisations, has occasionally been raised by the International Council of Voluntary Agencies, but is not often taken into account in general discussions regarding accountability in humanitarian action. Yet, the relation between the Southern and Eastern organisations, based where most crises occur, and their European or American based headquarters, may often be problematic.

- The question is how to ensure bottom-up participation in the formulation of quality and in the design of accountability?
- One inspiring project to be mentioned in this respect were counterpart reviews that have been organised among a number of development organisations in the Netherlands in the mid-1990s. These organisations invited interns from their Southern partners to stay for several months in their headquarters to review their organisation and develop policy and management recommendations.

Evaluation and monitoring

Given the long history of evaluation and monitoring compared to most quality enhancement initiatives, it is important to pay attention to experiences to date. ALNAP has an extensive file of evaluation reports and has undertaken a number of initiatives to make evaluation more effective, including the use of meta- and inter-agency evaluations³⁶. Points to consider include:

- There has emerged a set of criteria to evaluate humanitarian assistance, i.e. relevance, effectiveness, efficiency, impact, sustainability, coverage, connectedness, coherence and appropriateness. They are widely shared and have been adopted by the OECD³⁷. Note, however, that their interpretation and different weight attached to different aspect still accounts for diverse interpretations³⁸.

³⁶ ALNAP (2001) *Humanitarian Action: Learning from Evaluation*, ALNAP Annual Review Series

³⁷ Guidance for evaluating humanitarian assistance in complex emergencies. OECD/DAC, 1999.

³⁸ Frerks, G. and D. Hilhorst (1999) Issues in Evaluating Humanitarian Assistance. In: *Evaluating Humanitarian Aid. Politics, Perspectives and Practices. Proceedings of a Workshop*.

- Responsiveness to findings and recommendations of evaluations is not as common as one would expect, with little follow up in the institutions³⁹.
- Despite proclaimed principles, beneficiary participation in evaluation remains scattered⁴⁰.

Codes of Conduct

Apart from the well-known Code of Conduct of the Red Cross and Red Crescent Movement, and several other inter-agency codes, there have increasingly been initiatives to draw up field-level Codes of Conduct and agreements concerning collaboration and operation⁴¹. These have included different forms of monitoring the compliance of signatories. The Code of Conduct for NGOs in Ethiopia, for instance, includes an Observance Committee that is responsive to complaints.

- Further documentation of the impact of compliance measures incorporated in field-level agreements and evaluations would be useful.
- Some interviewees expressed concern with the manner in which the Code of Conduct of the Red Cross and Red Crescent Movement is being dealt with in practice. They wondered whether signing up has had much consequence for organisations since the Code is hardly made reference to in reporting and everyday practice. IFRC has started to consider how to advance with the Code, whether it should be updated or even extended to enable monitoring of compliance. Alternatively, it is considered that the Code may be left unchanged recognising it has inspired new initiatives that further its intentions.

Social audit

In the field of humanitarian action, social audits have mainly been implemented by the People in Aid project, which introduced these in their pilot phase (from 1997-2000) among 13 organisations.

Social audit is an accountability mechanism that adopts a stakeholder approach in order to assess the performance of an organisation in relation to its aims and those of its stakeholders. One powerful aspect of a social audit is that it combines internal stakeholder accountability with an external auditing process. It is also recommended because it combines qualitative and quantitative approaches. An Oxfam UK workshop highlighted a number of advantages of using social audits for exploring accountability *beyond* single organisations. It also raised the following reservations⁴²:

- Who enjoys respect enough to act as the external auditor?

³⁹Wood, A., R. Apthorpe and J. Borton (eds.) (2001) *Evaluating International Humanitarian Action, Reflections from Practitioners*, London/New York, Zed Books; *Evaluating Humanitarian Aid, Politics, Perspectives and Practices, Proceedings of a Workshop* (1999), Wageningen Disaster Studies. See also N. Dabelstein (1997) *Evaluating the International Humanitarian System: Rationale, Process and Management of the Joint Evaluation of the International Response to the Rwanda Genocide*, in: *Disasters* 20(4):287-294, on the interagency evaluation of the Rwanda crisis. One of the unique aspects of this evaluation was its follow-up study on the implementation of recommendations the year after.

⁴⁰ Kaiser, T. (2000) *Participatory and beneficiary-based approaches to the evaluation of humanitarian programmes*, United Nations High Commissioner for Refugees Evaluation and Policy Analysis Unit.

⁴¹ see for instance: Atkinson, Ph. and N. Leader (2000) *The 'Joint Policy of Operation' and the 'Principles and Protocols of Humanitarian Operation' in Liberia*, Study 2 in: *The Politics of Principle: the principles of humanitarian action in practice*. HPG Report 3.

Bradbury, M. and N. Leader (2000) *The 'Agreement on Ground Rules' in South Sudan*, Study 3 in: *The Politics of Principle: the the principles of humanitarian action in practice*. HPG Report 4.

- How does one reach common standards against which to measure performance when dealing with a range of organisations?
- Social audits are expensive in human and financial terms.

Peer review

Several interviewees considered peer reviews a possible method for enhancing accountability. As far as we know this has not yet been piloted. It was a part of the Humanitarian Ombudsman Project that was abandoned and is mostly known through the work of the Development Assistance Committee of the Organisation for Economic Co-operation and Development (DAC/OECD). This organisation uses a peer review process to review members' aid programmes, to make recommendations to one another, and to generate good practice and shared objectives.

- A problematic aspect already raised is that this is a costly and time-consuming activity.
- Could peer reviews be organised among agencies or should there be a (separate) facilitating institution?
- What would be the status of any recommendations formulated?
- Given that the DAC/OECD peer review is considered an inspiration for proposed peer reviews in the humanitarian sector, it may be recommended to evaluate its working and impact.

Accreditation

Accreditation involves an independent body that monitors compliance with a set of standards or codes and decides on accreditation accordingly. The independent body is normally an organisation from and mandated by the sector concerned. The accreditation process can vary in its methodology and scope. We can distinguish two models of accreditation, which may be relevant for the humanitarian sector.

In the first model, accreditation is formal and legalistic. It controls whether organisations fulfil particular conditions regarding finance and management. In the Netherlands, such a system is operative for fund-raising organisations, that checks, for instance, whether annual reports are made available and whether institutional overheads remain below a certain percentage of the budget (although this organisation is presently trying to include more substantive issues in the accreditation)⁴³. ECHO is presently working to establish such accreditation mechanism for NGOs willing to apply for funding with this organisation.

In the second model, accreditation is qualitative and value-based. It is more comprehensive and combines self-evaluation with a peer-review or an external visitation. This kind of accreditation is mainly known from the academe. It allows for both quality assurance and quality improvement by ensuring compliance to standards while providing guidance, training, and exchange of best practices among peers. There have been several NGO initiatives that focus on accreditation or certification. In the US, many humanitarian organisations are affiliated to InterAction, whose member

⁴² Raynard, op cit., page 16.

⁴³ Centraal Bureau voor Fondsenwerving

organisations have to certify compliance with the PVO Standards. At the end of every calendar year, each InterAction member is asked to review the Standards and re-certify compliance (self-certification). There is no present initiative among European humanitarian NGOs to explore the possibilities for accreditation.

- Accreditation is thus a label under which different membership arrangements can be headed, varying in scope, level of control by the accreditation institution and level of attention for qualitative processes and learning. Variations pose different institutional requirements and have different impact on quality and accountability.
- One question is whether a formal system of minimal requirements for accreditation can be fruitfully combined with a value-based comprehensive system, or whether these should be developed as alternative, complementary systems.

Personal accreditation

As an alternative to organisation accreditation, it has occasionally been suggested to work towards a system of personal accreditation for humanitarian workers. There is indeed an upsurge of courses and Master Degrees for humanitarian work, and introductory courses within organisations. The question is if it is feasible to define and impose a minimum level of specialised training for humanitarian workers.

- Who defines the minimum curriculum?
- Who would be entitled to give the accreditation?
- Should all humanitarian workers be accredited or a threshold per programme? How about local staff?

Legislation

In the World Disaster Report 2000, the International Federation of Red Cross and Red Crescent Societies opened the discussion about an international disaster response law. The need for such a law is considered that international humanitarian law mainly covers warfare, while peacetime disasters triggered by natural hazards or technological accidents, account for a large number of humanitarian crises. Furthermore international humanitarian law is lacking in offering standards or guidance for work in the field. Such a body of international disaster response law should provide internationally agreed standards for donor and beneficiary government action, and predictable mechanisms to facilitate an effective response to disaster. Among the areas proposed to be in need of further legal development are humanitarian standards of professionalism; humanitarian standards of conduct; transportation, immigration and customs; standards for relief goods; information sharing; access and security; contingency planning; interface with International Humanitarian Law; lessons learned, and disaster preparedness and mitigation. A separate box in the article discusses Sphere's minimum standards as a possible "body of customary international law in the making", provided that a number of important questions are solved, including the question whether they are absolute or aspirational and how they could be enforced. According to the report, it could take a long time before the standards have demonstrably attained customary legal status, upon which, some day, "they may become the standards required by international law"⁴⁴.

⁴⁴ World Disaster Report (2000) International Federation of Red Cross and Red Crescent Societies, page 145-157.

7. Institutional developments and conclusions

Looking at the present state of affairs, it is easy to conclude that issues of quality and accountability are high on the agenda of humanitarian organisations and their stakeholders. Quality measures taken in organisations, - varying from quality management systems, human resource development, adoption of standards, consultation, co-ordination, evaluation, and strengthening of research capacity-, enhance their performance and facilitate better transparency and accountability, due to the fact that they are normally documented and can be reported on. In addition, there are a number of initiatives in the humanitarian sector that aim to enhance quality and co-ordination, ranging from inter-agency arrangements in the field, and inter-agency evaluations, to projects like Sphere, People in Aid, ALNAP, the Quality Platform and the Humanitarian Accountability Project. To a lesser extent initiatives are being developed to enhance quality and accountability in the wider humanitarian context.

I do not expect that these initiatives converge into a 'system' wide institution that monitors compliance to an agreed set of standards. This would be unlikely considering the different notions of what *is* best quality, and the diversity among organisations regarding their background, institutional set-up and organisational cultures. It is much more likely that there will continue to be different quality 'circles', each evolving in their own way. This would not make the humanitarian sector exceptional, since it is quite common that professions have different parallel associations. Whether or not this will include the development of independent membership associations with an accreditation component depends upon the development in these 'circles'. In order to be meaningful, such arrangements have to grow out of ongoing activities within the organisations themselves, although they can significantly be enhanced by other stakeholders, including donors, the media and local institutions.

During interviews, many people adhered to a distinction between learning and control. It is argued that to maximise learning, quality measures should be kept internal, because outside accountability components would inhibit frankness and willingness to learn. Although this may be relevant to some extent, several methods have proven to be most effective by combining internal and external accountability, notably in evaluations and social audits. Besides, some people seem to make an unwarranted distinction between regulation and self-regulation. Self-regulation seems perceived by some to mean that organisations mind their own business without interference from external sources. Although this is one form, self-regulation can also refer to regulation by an independent body, governed by its members from the sector, and mandated to monitor, report or even sanction members.

The pace of new initiatives in the last couple of years is impressive. Their impact is still increasing, and their effect on the actual quality of humanitarian programmes is still waiting to be assessed. Furthermore, it appears that the institutional requirements that are implicit in quality enhancing activities have not entirely been appreciated and followed through. For example, it seems that the potential of evaluation has not always

been realised because follow-up measures have been lacking⁴⁵. Initiating management systems and other organisational measures often requires substantial translation in administration, communication, relations with partner organisations and external linkages, and everyday practices with beneficiaries to become fully effective. Hence, there seems a lot of room for enhancing quality and accountability by maximising existing strategies and arrangements.

The question remains of how to deal with organisations that operate under the guise of humanitarian action but do not meet any of the prevailing quality notions? These can jeopardise and cause harm to the population in need and to other 'genuine' humanitarian organisations. Such organisations operate outside of any of the quality circles, often with private funds and thus escaping scrutiny from donors. Another question that is hardly explored concerns the desirability and feasibility to develop legislation around humanitarian action.

Finally, some people have been cautious that quality and accountability were merely one of those passing fashions that seem to litter the history of development. However, when we take into account the massive body of quality enhancing measures that are being adopted by humanitarian organisations this fear seems unfounded. It looks like issues of quality and accountability are here to stay.

⁴⁵ See the ongoing research commissioned by ALNAP and conducted by Bert van der Putte.