SCHR

Steering Committee for Humanitarian Response

Created in 1972, the SCHR is an alliance for voluntary action of Care International, Caritas Internationalis, International Committee of the Red Cross, International Federation of the Red Cross and Red Crescent Societies, Lutheran World Federation, Oxfam International, Save the Children, World Council of Churches/ACT, World Vision International

SCHR Peer Review on Accountability to Disaster-Affected Populations

An Overview of Lessons Learned

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-1-

EXECUTIVE SUMMARY

The Steering Committee for Humanitarian Response (SCHR) is an alliance of major international humanitarian organisations aiming to support increased quality, accountability and learning within the humanitarian sector. To this end it used a Peer Review process to strengthen and deepen efforts that demonstrate organisations' Accountability to Disaster-Affected Populations. This paper provides an overview of some of the key lessons that emerged.

Given the specific focus on learning of this peer review, a common definition of accountability towards affected populations was not a prerequisite. Instead, self-assessments undertaken at country and central (headquarters) levels provided the basis for the conversations held with members of affected communities, staff, member organisations and their partner agencies. On the basis of these conversations, plus review of core documents from each organisation, reports were written by inter-agency review teams (supported by external facilitators) that summarised key findings, highlighted good practices and recommended steps that could be taken to further strengthen each organisation's accountability towards affected persons. Organisations then developed an action-plan in response, which is reviewed annually. It is anticipated that it is in these action plans that the real impact of the peer review will be seen – putting the learning into practice.

Although each organisation embarked on the peer review from a different starting position, there are a number of lessons that resonate with all.

Firstly, several aspects of accountability emerged as common for the 9 organisations:

- Acknowledging, making visible and diminishing the power imbalance between organisations and disaster-affected persons

- Involving affected persons meaningfully in key decisions and processes that influence their lives

- Building relationships with affected persons that are characterised by dignity and respect
- Sharing relevant information and communicating transparently (providing feedback to disaster-affected persons as well as consulting them)

- Behaving with integrity, keeping to commitments made and engendering trust.

What follows are those issues that came up time and again for either all or a large majority of the nine involved, and constitute the common lessons of the peer review.

Accountability based on values. All 9 organisations anchor their stated commitment to accountability towards disaster-affected persons to core organisational values or principles.

The Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief includes several principles that are directly relevant to accountability towards disaster-affected populations. Overall, though, the Code of Conduct was little-known, and was often confused with internal staff codes of conduct. However, there were also examples where the Code's provisions had been 'internalised' through core organisational policies. In such cases, staff

were often aware of key principles of the Code without being able to attribute these to the Code of Conduct per se.

Living out values. But values are not enough. Organisations need to demonstrate that they value accountability - first through strong leadership commitment, and second by valuing and rewarding accountable approaches, both at programme level (i.e. quality) and with individual staff (i.e. performance). Accountability is demonstrated most strongly when the values of individual staff resonate with the values of the organisation. Synergy can be achieved when the individual feels able to pursue their personal convictions because these are reinforced and valued by the organisation. In the end, accountability is about living out values such as compassion and respect for humanity.

Accountability needs to be managed. The peer review progressively revealed the understanding that accountability towards disaster-affected populations as being about approaches to work and not a menu of "accountability activities". Accountability is more a process than an end-state. Strong and effective management is key to creating the right institutional environment (a 'culture of accountability') where such processes are valued and where continuous striving for improvement and learning is supported..

Accountability has institutional and individual dimensions. Learning from all organisations identified that a systems approach to accountability is insufficient. It only takes an organisation so far down the road to BEING more accountable. Accountability is best addressed by inserting and embedding it in existing procedures and tools – to make it part of how an organisation works in all its facets, not just programming.

Changing the relationship with affected groups. Accountability cannot be pursued as a project. Accountability to disaster-affected persons requires organisations to work differently rather than do different things. It is about pursuing a process which changes the nature of the relationship with affected groups rather than achieving an end-state of accountability.

Accountability to all persons of concern. One of the earliest lessons through the process was that 'accountability to disaster-affected persons' cannot be isolated from an organisation's accountability to the numerous other population groups it seeks to serve. This requires joining up the thinking, learning and practices across the development and disaster-response domains, for it goes to the core of an organisation and the people it recruits and supports to do its work.

Modelling accountability internally. Accountability towards affected persons is possible when the organisation is accountable to its own staff and members. Organisational cultures that tolerate abuse of power by management, or that fail to provide a trusted means of bringing grievances to the fore, are likely to undermine and impede efforts to promote accountability to affected communities.

Seeking out feedback and complaints. Feedback and complaints mechanisms reduce the power disparity between the organisation-as-provider and individual-as-recipient. These need to be designed with affected groups, so that they can build on existing processes and be appropriate to the context. Proactive efforts are needed to capture the perspectives of all sub-groups of a population.

Timely and quality responses. The humanitarian imperative does not imply that speed is more important than accountability. The hardest aspect of accountability to disaster-affected persons seems to be managing the tensions between the timeliness and the quality of a response.

Building relationships and capacities in advance of crises. Accountability as a process needs to be embedded in all phases of programming, especially emergency preparedness. In order to be accountable during an emergency response, the necessary foundations of dialogue, understanding and staff skills need to be laid during the preparedness stage.

Maximising the involvement of affected groups. 'Participation' is rarely fully realised. Participation of affected persons tends to be extractive and limited to assessment processes. Much less effort is made to provide affected populations with feedback. Meaningful participation emerges from the two-way dialogue that characterises feedback procedures. It requires that affected persons are involved in key decision-making, including validating operational successes and identifying failures.

Being transparent. Though transparency is understood as a dimension of accountability, organisations find it challenging. A common sense developed through the PR was that information should be shared unless there is a good reason not to, which would lead to stronger trust between organisations and affected groups.

Being fair and responsible with partners. Accountability cannot be delegated to partners. 'Indirect accountability' is no accountability in practice, without a clear and agreed demarcation of roles and responsibilities which are then monitored. Partners need to be involved in any accountability processes, should be held accountable for their actions and should trust the partnership relationship enough to share concerns heard from communities.

Investing in accountability. Specific resources are required for the staff time, the development of staff skills and specific processes (such as complaints-handling). Organisations need to plan for such costs and allocate resources accordingly, so that accountable processes feature throughout the project cycle.

Advocating for accountability. Donors are not consistent in respecting commitments made as 'good humanitarian donors' or in the Paris Declaration[1], and their stringent reporting requirements are often felt to distract and detract from an organisation's ability to pursue accountability towards affected persons. This is a potential area for joint advocacy.

Conclusions may be premature, for the lessons of the peer review process are still being learned and applied; and for some this may continue over a protracted period when the institutional environment becomes more conducive to following up in a meaningful way.

Some of the organisations involved understand not only the importance of accountability to disaster-affected populations, but also its implications: that accountability requires organisations to change the way they work, by creating a different relationship with persons of concern where the aim is to diminish the power disparity between them. Learning from the peer review points to the need for attention to both policies/systems and attitudes/behaviours.

More generally, the term 'accountability' is not well-understood amongst staff of participating organisations, particularly at the level of country programmes. Moreover, the term itself can frequently block individuals' understanding, so that accountability is kept at a distance, as policy-level rhetoric rather than a responsibility that needs to be acted upon. This points to the need for incremental and practical guidance on how organisations can realise their accountability to

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[1] Paris Declaration on Aid Effectiveness. Ownership, harmonisation, alignment, results and mutual accountability. March 2005. http://www.google.co.uk/search?hl=en&source=hp&q=paris+declaration+2005&meta=&aq=f&oq=

disaster-affected persons – such as through complaint mechanisms; or the provision of feedback to disaster-affected persons on key decisions or learning; or their involvement in such stages.

Partnership and membership relations pose specific challenges to promoting and ensuring accountability to disaster-affected persons. There is an inherent tension between on the one hand, working in a relationship based on trust and mutual respect, and on the other, working to ensure that the relationship results in a quality (accountable) response. Control and trust are often approached as competing concerns, yet examples demonstrate that trust can be built on shared control.

Individual staff make it possible for organisations to realise their responsibility and commitment to accountability towards affected populations. It is perhaps on their personal commitment and drive that accountability to disaster-affected persons rests most securely.

1   PURPOSE AND BACKGROUND

The Steering Committee for Humanitarian Response (SCHR)[2] uses the Peer Review (PR) method as a tool for facilitating learning within and between its members. This paper captures learning derived from the SCHR Peer Review on Accountability to Disaster-affected Persons.

In January 2007, the Principals of the SCHR agreed on three objectives for this Peer Review:

- To understand the range and diversity of approaches to accountability to disaster-affected persons;

- To share best practices, challenges, and learning within and between members in taking forward the adoption, integration and use of different approaches to accountability, and their relative effectiveness and practicality;

- To inform decisions about whether and how best to prioritise and integrate the diversity of accountability approaches in our organisations and the humanitarian sector.

Outside the SCHR, PR as an approach to learning has a much longer legacy. There are examples of use of PR by numerous actors in the humanitarian arena, including the IFRC, World Vision, the EU and the UN. But the most experience resides in the OECD (Organisation for Economic Cooperation and Development), which has used peer review since its creation in 1960. The OECD's Development Assistance Committee uses PR to promote the process of learning across its bilateral donor members, by reviewing the development co-operation and humanitarian systems of each.

The SCHR model of the PR has been adapted from the OECD model, most notably with the inclusion of an external consultant component to provide rigour, comparability and coherence. It is based on a combination of self-assessment by each organisation, document review and interviews/group discussions[3]. The methodology has also undergone several modifications since the SCHR first used it in 2002, to maximise the learning. A description of the methodology, and lessons about the process, are given in the Annex.

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[2] Action by Churches Together (ACT), CARE International, Caritas Internationalis, the International Committee of the Red Cross (ICRC), the International Federation of Red Cross and Red Crescent Societies (IFRC), Lutheran World Federation (LWF), Oxfam and the International Save the Children Alliance. UNHCR was invited to join the process owing to a shared concern to do more to demonstrate the centrality of disaster-affected persons in humanitarian response. World Vision joined the SCHR after the peer review had commenced, so is not included.
[3] Examples of good practices were also captures, occasionally through the self-assessments but mostly through the interviews. Some of these are shared in this report where they help to illustrate specific points.

2 WHAT IS ACCOUNTABILITY?

There are many different levels of accountability and different stakeholder groups to which an organisation is accountable. There was recognition that accountability to donors, to the general public, to governing bodies and to headquarters (in the case of field offices) can easily 'squeeze out' accountability to affected populations, unless active efforts are made to uphold it. Although there are critical financial (or legal) accountability requirements, there is no such obligation for accountability towards disaster-affected persons. There are standards that organisations can voluntarily commit to (such as the HAP Standard[4]), there are no concomitant sanctions if they choose not to do so.

> *GOOD PRACTICE*
> Oxfam's *Accountability Report*[5] is driven in part by a need to consolidate the different accountabilities experienced by Oxfam. It provides an organisational overview of Oxfam's accountabilities to: populations affected by crisis, people living in poverty, partners, donors and supporters, governance, staff, the environment and ethical purchasing.

Two significant semantic hurdles emerged during the PR. Firstly, 'accountability' is not easily translatable from English, or becomes confused with legal, financial or even religious terms. Secondly, and more widespread, is the concern that 'accountability' has become a much-abused word which may mask poor understanding or misunderstanding amongst staff.

Organisations participating in the SCHR PR wanted to find out how each addresses the issue of accountability to disaster-affected persons in its own policies and practices. For this reason, it was decided to use each organisation's own definition of accountability (if it had one). The absence of a shared definition or framework is regarded as both a strength and a weakness of this PR. By not imposing what accountability means, or trying to achieve consensus on it, the PR was valued for its specific attention to each organisation's position and expectations. Nevertheless, some staff felt that the absence of a common framework weakened the process. However, since the PR is a learning exercise, not an evaluative event, and since learning has to be owned for it to have a likelihood of being applied, it could be argued that the imposition of a shared framework would have undermined the learning for which the PR is valued.

Staff across all the organisations called for a more precise discourse on accountability to disaster-affected persons, unpacking the term and using explicitly the specific component elements that 'accountability' implies. Some such component elements emerged as common across the nine organisations. Although these are not exhaustive, and have not been worked on jointly to refine them, they nevertheless portray the reality of the status of current thinking as it transfers across 9 organisations.

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[4] Humanitarian Accountability and Quality Management Standard (2007).
http://www.hapinternational.org/pool/files/hap-2007-standard(1).pdf
[5] See http://www.oxfam.org.uk/resources/accounts/downloads/3430_accountability_report_web.pdf

Accountability is understood as a means to challenge and correct the fundamental power disparity[6] between aid provider and aid recipient. Accountability therefore requires measures that seek to redress the power imbalance and that prevent abuse of that power.

Several dimensions are clearly missing from the above list, not least the accountability dimension of providing quality responses and delivering relevant results - and the need to acknowledge and take responsibility for any failures to do so. Such issues did come up, but were not strongly or consistently expressed across all nine organisations, so have not been included above.

One recurring recommendation was to advise organisations to draft a clear, brief statement of their understanding of, and commitment to, accountability. This would serve as a reference for staff discussions/training, communications, policy development and operational guidance. It would help staff to understand the roots of this commitment, and the connections with other policies and priorities.

3 ACCOUNTABILITY IN PRACTICE – LESSONS

Each agency has specific lessons to learn, good practices to spread, questions to answer and recommendations to consider. What follows are those issues that came up time and again for either all or a large majority of the nine involved, and constitute the common lessons of the peer review.

3.1 ACCOUNTABILITY BASED ON VALUES

All 9 organisations anchor their stated commitment to accountability towards disaster-affected persons to core organisational values or principles.

The Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief[7] is a common resource to which all organisations participating in the PR have committed[8]. Several of its provisions are directly relevant to accountability towards disaster-affected populations, especially Principle 9: "*We hold ourselves accountable to both those we seek to assist and those from whom we accept resources*". The Code was most valued by staff as a reference document on humanitarian principles, with specific practical benefit in difficult

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[6] This was explored in the first SCHR PR on the prevention of sexual exploitation and abuse, undertaken from 2003 to 2006.

[7] Although UNHCR is not a signatory, it uses the Code of Conduct in its partnership arrangements.

[8] For UNHCR, this is seen in the inclusion of the Code of Conduct in the organisation's partnership agreements.

operating environments as a tool for joint advocacy. Isolated examples were also found where the Code had been used in communications to affected groups. Overall, though, the Code of Conduct was little-known, and was often confused with internal staff codes of conduct. However, there were also examples where the Code's provisions had been 'internalised' through core organisational policies. In such cases, staff were often aware of key principles of the Code without being able to attribute these to the Code of Conduct per se.

Several organisations made direct and explicit connections between their principles and values and organisational policies and priorities.

> *GOOD PRACTICE*
> For example, in Caritas, Catholic Social Teaching and values define and unite the Caritas confederation. They are therefore embedded in all key documents, to justify and root the specific topic under discussion in these shared foundations. For example, principles of Catholic Social Teaching are grouped into four, to provide a framework for Caritas' advocacy on Global Governance:
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> 1. Principles that should serve as the basis in discussions of global governance (human dignity; human freedom and responsibility; and integrity of creation);
> 2. Principles that should guide the process of global governance (subsidiarity and participation);
> 3. Principles that must be taken into consideration when proposing changes to global governance structures (the common good; a preferential option for the poor; care of God's creation); and
> 4. Principles that underline the vision of humanity's future (global solidarity and peace).
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> Another example is the use of the 7 Fundamental Principles of the Red Cross Movement within the IFRC. The Principles (*Humanity, Impartiality, Neutrality, Independence, Voluntary service, Unity, Universality*) have been in formal use for nearly 45 years, so are firmly embedded in the organisation's culture and language, even at field level. In Ethiopia, for example, young female volunteers in Wolayta completely understood what they termed as 'the *whatness* of the Red Cross' through these Principles. They were able to expound on their relevance and importance in the context of the Wolayta emergency response and the concomitant relationship between the branch volunteers and the disaster affected communities.

Such connections helped provide staff with a clear sense of the organisation's centre of gravity, where core principles were seen to inform and guide priorities and decisions consistently. Where these core principles underscored accountability, there was evidence of stronger staff motivation to behave and work in a way that demonstrated the organisation's accountability towards affected persons.

3.2 LIVING OUT VALUES

Accountability is demonstrated most strongly when the values of individual staff resonate with the values of the organisation. An organisation's culture is defined partly by the staff (their personal conduct, attitudes and priorities) and partly by the *modus operandi* of the organisation (the systems that reflect management priorities and expectations and even the terminology used). This combination reveals the importance of the interplay between staff codes of conduct (that guide personal behaviour) and the Red Cross/NGO Code of Conduct (that guides organisational behaviour).

Organisational policies, systems and procedures are important, but mechanisms that seek and build on the ethics of individual staff are as necessary. Human resource systems and practices offer an important avenue for connecting individual and organisational values and priorities, so that individuals feel able to pursue their personal convictions because these are underscored and valued by the organisation.

All organisations have developed staff Codes of Conduct which build on the organisations' values and principles to make clear to staff what is expected of them. The Codes are tied to the contractual agreement between organisation and individual, and are often the key reference for defining what 'staff misconduct' means. These Codes of Conduct are potentially key instruments in guiding not only the personal conduct of individuals but also the institution's culture and accountability.

> ### GOOD PRACTICE
> The 'LWF Staff Code of Conduct Regarding Abuse of Power and Sexual Exploitation' (2005) makes explicit the issue of power-abuse and contextualises the specific phenomenon of sexual exploitation within it. The Code stipulates: "*It is understood that this code of conduct refers to any kind of misuse of power and exploitation in the working relationships among LWF employees and with those they serve*" (p.2). It also gives a compelling definition of 'abuse of power' (p.5): "*Abuse of power is manifested in how those with less power are treated physically, psychologically, emotionally and/or sexually. Sexual activity, even when consensual, between those of unequal power in this sense is an abuse of power*".

Whether Codes of Conduct effectively shape accountable behaviour would depend on a number of factors, including the extent to which the organisation's values fit with the existing attitudes, motivations and ethics of its staff, and the extent to which the Codes of Conduct are disseminated, understood and reinforced. Recognition of the importance of accountability towards disaster-affected persons needs to be rooted within the individual; organisations cannot create this commitment out of nothing, but they can provide the necessary nurturing environment to reinforce and strengthen the values already held by individuals. And they can put in place mechanisms – such as complaints mechanisms, 'whistle-blowing' procedures and screening at recruitment – that can filter out those individuals whose personal values, demeanour, or comportment, fail to demonstrate the necessary humility towards, and respect for, disaster-affected persons.

> ### GOOD PRACTICE
> UNHCR offers regular, mandatory, refresher training on its staff Code of Conduct, which is widely appreciated as a way of reminding and encouraging staff to respect core organisational principles. Scenarios are used to stimulate discussion and reflection.

Staff performance reviews featured quite prominently for several organisations as a means of realising the connection between individual and organisational values. Although the tendency was for values to be explored through unstructured conversations between line-manager and staff member, several organisations recognised the potential for the appraisal process to be used more strategically to monitor performance according to values as well as objectives. Performance appraisals that explore measures that promote accountability to affected groups would provide a strong incentive to staff. One organisation included feedback from refugee committees as part of the performance review of staff-members based at camp level. This was valued by all stakeholders for helping to strengthen trust and understanding. Using core competencies can be another helpful tool both at screening and appraisal stages. In general, the 'soft' skills required for accountability (such as people-focused approaches and communication skills) tend to be more evident (and valued) in development work than in humanitarian work, where technical skills are

recognised more readily. This was evidenced in Nepal, as an example, where organisations working in both long-term programmes as well as disasters responses, were not capitalising enough on the skills set of the former to inform the latter.

> ### GOOD PRACTICE
> ICRC uses elements from its staff Code of Conduct and the Red Cross Principles in annual staff reviews. Included are: Respect for others (victims, staff, outside contacts); Sensitivity to cultural, social and religious environment; Respect for local standards of conduct; and Exemplary conduct. These are used by line-managers to assess staff behaviour and reinforce the organisation's expectations of its staff.

Staff attitudes and values also have a strong influence on how the organisation's policies and guidelines are followed and put into practice. All organisations struggle to bridge the perennial policy-practice gap. Are organisations doing enough to make their values and commitments meaningful to individual staff so that they become more likely to be taken into account in decision-making? Staff across the organisations emphasised the importance of creating time and space for team discourse and exchange, as well as possible writing-time to contextualise the global rhetoric into local realities.

3.3   ACCOUNTABILITY NEEDS TO BE MANAGED

But values are not enough. Organisations need to demonstrate that they value accountability - first through strong leadership commitment, and second by valuing and rewarding accountable approaches, both at programme level (i.e. quality) and with individual staff (i.e. performance). Accountability is more a process than an end-state. The peer review progressively revealed the understanding that accountability towards disaster-affected populations as being about approaches to work and not a menu of "accountability activities". Strong and effective management is key to creating the right institutional environment (a 'culture of accountability') where such processes are valued. Accountability also has both institutional and individual dimensions.

3.4   ACCOUNTABILITY HAS INSTITUTIONAL AND INDIVIDUAL DIMENSIONS

As one staff-member put it: "*Accountability is an attitudes, beliefs and behaviours 'thing'. We want people to BE more accountable rather than DO more accountability things*". Learning from all organisations identified that a 'systems approach'[9] to accountability is insufficient. It only takes an organisation so far down the road to BEING more accountable. It is best addressed by inserting and embedding it in existing procedures and tools – to make it part of how an organisation works in all its facets, not just programming. And this needs to be done in such a way so as not to add bureaucracy and thereby risk quashing the spirit of humanitarianism that seems to motivate so many of the staff interviewed. Lastly, accountability cannot be isolated to emergency personnel and programmes; it goes to the core of an organisation and the people it recruits and supports to do its work.

3.5   CHANGING THE RELATIONSHIP WITH AFFECTED GROUPS

Accountability cannot be pursued as a project. Accountability to disaster-affected persons requires organisations to work differently rather than do different things. It is about pursuing a process which changes the nature of the relationship with affected groups rather than achieving an end-state of accountability.

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[9] Referring to efforts focused on policies, procedures and reporting requirements.

3.6   ACCOUNTABILITY TO ALL PERSONS OF CONCERN

Accountability to disaster-affected persons cannot be treated in isolation from an organisation's accountabilities to the numerous other population groups it seeks to serve (e.g. poor, marginalised, incarcerated, stigmatised and so on). This requires joining up the thinking, learning and practices across the development and disaster-response domains. There is need for organisation-wide understanding of accountability towards populations of concern within which specific issues pertinent to disaster-affected groups may need to be developed.

3.7   MODELLING ACCOUNTABILITY INTERNALLY

A lesson learned early in the PR process is that an organisation that wishes to be accountable to disaster-affected persons needs to be internally accountable to its staff and members. Staff need to feel that accountability towards those served by the organisation is a genuine commitment, and permeates throughout working practices, by:

- Ensuring (staff-)members understand what is expected of them concerning accountability towards disaster-affected populations (i.e. behaviour, roles and responsibilities);
- Ensuring (staff-)members have the skills to translate the spirit of organisational commitments into practice;
- Establishing a system to monitor compliance with principles of accountability, both to disaster-affected populations and between (staff-)members;
- Ensuring staff grievance procedures are known to all staff (and members) and that all reports receive a response.

Though organisational policies and guidelines are important, they are not enough to ensure accountability. They need to be internalised and applied by the staff that make up the organisation. This requires strong leadership and role-modelling to really inculcate accountable behaviours by staff.

An institutional dimension of this relates to the confederated structure of some of the SCHR organisations, where there is an issue about the accountability of the central coordinating office to the member organisations. The PR used these offices as its entry point for each confederation. Any initiatives from these centres rely on a strong and productive relationship with the members in order for new ideas to be taken up, because the management authority of the coordinating offices over the members is either absent or extremely limited. Membership structures certainly pose challenges, but the shared values, sense of vocation and long-term presence came out as strength for the confederated SCHR members. The real difficulty for each seems to lie in getting the right balance between ethos/values and the codifications of those values so that they can be monitored in a meaningful way across the various operational contexts of their members. There is also a challenge for an alliance to encourage its members to give up some of their independence in order to function more effectively as a collective so that the overall impact amounts to more than the sum of its parts.

> *GOOD PRACTICE*
> ACT has launched a Capacity Development Initiative to enhance members in relation to their programmes and activities, their internal organisation and their external relations. One of the first steps in the CDI process is a self-appraisal using an Organisational Capacity Assessment (OCA) tool. One of the dimensions examined in the OCA concerns: '*Accountability, Motivation and Learning Capacities*', further broken down to components

that include '*Transparency in relation to disaster affected communities*'; '*Participation of disaster affected populations and their representatives in programme decisions and in giving their informed consent*' and '*Assessment of programme and performance*'. The OCA guidelines identify community representatives as key stakeholders to be involved in the process.

Organisations also struggle to maximise the learning opportunities about accountability and from being accountable. Learning about accountability works better where organisations invest in fora where staff can exchange and discuss in person, rather than relying on paper trails or common data-bases. Learning from being accountable is only beginning to emerge, and examples were limited largely to participation.

3.8   SEEKING OUT FEEDBACK AND COMPLAINTS

Feedback and complaints mechanisms reduce the power disparity between the organisation-as-provider and individual-as-recipient. Staff at community levels who are sharing and receiving feedback and complaints need to work in a way that engenders confidence amongst affected persons - confidence to speak in the knowledge that it will be safe to do so; and confidence knowing that complaints will be taken seriously by the organisation. There was wide variation in organisations' efforts to establish and manage complaints systems for use by disaster-affected persons – ranging from nothing (beyond staff receiving any complaints during the course of their normal work), to multi-pronged avenues for lodging complaints followed through by designated and trained personnel.

In Ethiopia and Haiti as examples, informal complaints mechanisms were consistently observed, closely linked to existing community and government practices. Though informal, these seemed to be well-respected, involving village elders, traditional leaders, district administrators, head of community development committees or organisation staff. However, although such a culture of complaint-lodging was valued, missing were organisations testing assumptions: firstly, that all sections of a community know they have a right and means to complain; and secondly, that the necessary processes would then kick in once a complaint was received.

Organisations commonly use 'complaint' or 'suggestion' boxes. In Kenya, affected persons in refugee camps raised the following concerns about the complaints system there:

- Insufficient understanding of how mechanisms work, especially what type of 'complaint' can be placed in the locked boxes.

- Doubt that the entire population has effective access to the mechanisms, and scepticism that complaints given verbally are actually transmitted to the organisation.

- Some individuals do not trust the security of the mechanism and fear retaliation by the organisation through decreased support if they "complain too much", or by the perpetrator, if a complaint becomes known to them.

- Many felt the quality and timeliness of organisations' responses to complaints lodged were insufficient (though it was often difficult to determine whether interviewees had not received a timely response or whether they had received one, but did not like it).

Although they can be a commendable means of enabling complaints about staff or services, boxes need to be used as one element of a broader feedback system. Proactive efforts are required to reach a wider cross-section of the population - those least able either to write, or to have the means to pay someone to write a complaint, or to be mobile enough to post it, or to have the confidence to complain at all.

Complaints mechanisms need to take into account the inherent power relations in the population, the status of women and the political dimension of a disaster – a challenge confronting all organisations. Recurrent shortcomings point to the need to establish, or improve any existing, complaints mechanisms through the participation of affected groups so as to help ensure a) more awareness among the affected population concerning the purpose of and procedures for lodging complaints; and b) better access to the mechanisms for the most marginalised individuals. This can take a number of forms - a national ombudsman, a joint service[10] across all organisations, or an individual organizational mechanism. Organisations also need to pay attention to ensuring adequate staff capacity to process complaints and to establishing a system to document the receipt of complaints and follow-up actions taken.

> *GOOD PRACTICE*
> ACT adapted inter-agency guidance[11] on complaints to suit their confederation:
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> Characteristics of an effective complaint mechanism
> Safety: A safe complaint mechanism will consider potential dangers and risks to all parties and incorporate ways to prevent injury or harm. This will include ensuring confidentiality, offering physical protection when possible, and addressing the possibility of retaliation against witnesses.
> Confidentiality: Confidentiality is an ethical principle which restricts access to and dissemination of information. It requires that information is available only to a limited number of authorised people for the purpose of concluding the investigation. Confidentiality helps create an environment in which witnesses are more willing to recount their versions of events.
> Transparency: A mechanism is 'transparent' when members of the affected community know it exists, have had input into its development, and possess sufficient information on how to access it and ensure it is adhered to……. and all communities should know who in the organisation is responsible for handling complaints and communicating outcomes.
> Accessibility: A mechanism is accessible when it is available to be used by as many people as possible from as many groups as possible in all places where an organisation is operational. Communities must be told how to complain and be actively encouraged to make complaints when problems arise.

Only a small minority of organisations have a system for compiling, across all country operations, the number of complaints lodged, broken down by different stakeholders. In light of limited resources, any reporting process needs to ensure that it does not unnecessarily burden the system and detract from the quality of complaint redress.

3.9 TIMELY AND QUALITY RESPONSES

The humanitarian imperative does not imply that speed is more important than accountability. The hardest aspect of accountability towards disaster-affected persons seems to be managing the tensions between the 'timeliness' and 'quality' of a response. The imperative to respond quickly to humanitarian need was perceived by many of those interviewed as being at odds with the commitment to respond in the right way. The imperative to act speedily is a real issue, but should not preclude being accountable for an organisation's operations or programming. It is always

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[10] HAP-I in collaboration with Save the Children UK has set up a global Inspectorate Project to increase the accountability of humanitarian workers for the protection of children and adults from exploitation and abuse by agency staff.
[11] From '*Building Safer Organisations. Guidelines: Receiving and investigating allegations of abuse and exploitation by humanitarian workers*'. ICVA, 2007, p. 7. http://www.icva.ch/doc00002028.pdf Adapted by ACT in its Guidelines for Complaints and Compliance.

possible to enable some influence by disaster-affected persons on needs assessment and project planning, however limited this may be in the first stages of rapid-onset crises. The requirement is to have accountable approaches as an objective from the outset, so that practices can be strengthened and deepened as opportunities arise.

> *GOOD PRACTICE*
> CARE Haiti recognises the importance of emergency preparedness planning for accountability during response; yet staff felt that the time constraints during the immediate 'life saving' phase make full implementation of accountability principles impossible. To address this, a 'phased' approach has been developed: During initial rapid response (up to 3 months) they conduct daily debriefings to assess the 'comportment' of temporary staff and to identify any social/political/environmental constraints that must be overcome so as to better orient follow-on programmes. During the second 3 months, CARE evaluates community resources that can be built on to design durable solutions. Then, at six months after a disaster, the organisation is able to begin to implement durable solutions.

3.10 BUILDING RELATIONSHIPS AND CAPACITIES IN ADVANCE OF CRISES

Accountability as a process needs to be embedded in all phases of programming, especially emergency preparedness. The importance of emergency preparedness activities for ensuring accountability during response was therefore recognised by many staff, as well as by affected groups and some partners. Indeed, many felt it would not be possible to adequately address accountability during an emergency response if the foundations had not already been laid earlier – in terms of dialogue, understanding and staff skills.

Preparedness efforts are the key to ensuring that a response is both timely <u>and</u> accountable, and organisations should address accountability as part of their emergency preparedness activities. Specific steps taken by the SCHR organisations included: dialogue with partners to arrive at a shared understanding of approaches and mutual responsibilities; agreeing on ways of working, especially in relation to monitoring the quality of the response process; pre-training of community-based volunteers in participatory assessment process and tools so that they can be deployed very quickly when needed. When establishing and training local civil protection committees or disaster response structures, organisations need to consider how these will remain operational between disasters, especially where the state has little capacity to support them. At a minimum, efforts should be made to conduct follow-up visits to such structures in priority areas prior to the start of predictable high-risk periods, such as hurricane seasons.

> *GOOD PRACTICE*
> As part of preparedness work in Nepal, Oxfam played an active role in supporting the development of a standardised inter-agency Initial Rapid Assessment (IRA) format, including making specific efforts to involve local partners and government authorities in influencing the design of the tool. Oxfam trained partners and staff in using this format and prepared agreements with some partners ready for deployment in IRA teams. These preparedness investments permitted the rapid deployment of two multidisciplinary IRA teams the day after the breach of the Koshi River embankment in 2008. Thirty focus group discussions (including with men and women separately) were undertaken in one day. The 46 volunteers involved included other NGO staff, government personnel and media people.The assessment report was made available within three days and resulted in a rapid decision to respond.

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- 14 -

3.11 MAXIMISING THE INVOLVEMENT OF AFFECTED GROUPS

Participation of disaster-affected populations was cited most often as a dimension of accountability, and featured prominently in nearly all organisations' approaches. It is one means of redressing the power imbalance discussed earlier. Despite this recognition, however, participatory practices at programme level tend to be skewed to consultations as part of assessment and planning, with far less attention being given to ensuring participation of affected populations during implementation, monitoring or evaluation. In seeking the participation of disaster-affected persons, organisations tend to limit this to assessment processes and to 'extract' information rather than setting in place a true process for on-going dialogue.

> *GOOD PRACTICE*
> In Yemen, a health programme run by an operational alliance of three national society members of the IFRC was characterised by high levels of community participation – including in the design and implementation of the work. Furthermore, community representatives were invited to a senior programme review meeting where they gave feedback about the felt strengths and weaknesses of the programme and what they thought should change in the future. They gave powerful testimonies on how the project had changed the life of affected persons.

Organisations rarely give disaster-affected persons a proper place in assessing the impact of interventions and in commenting on performance. The contribution of affected persons to lessons that should be learned is limited. They are rarely treated as end-users of the services. Meaningful participation emerges from the two-way dialogue that characterises effective feedback procedures. It requires that affected persons are involved in key decision-making and in validating operational 'successes' or failures – in terms of 'results' or 'impact'. Much of what accountability embodies is felt to emerge when organisations and staff truly respect the affected population and take an approach of partnership.

> *GOOD PRACTICE*
> 1. ICRC's Colombia programme instigated follow-up monitoring visits 6 months after completion of emergency interventions. These were used to assess with affected populations the appropriateness of the assistance provided and thereby improve on-going programmes.
> 2. LWF in Colombia undertakes evaluations in 3 stages: First, communities are asked to identify what was good and bad about a programme; the LWF team undertakes a self-evaluation of the work; and finally the two are consolidated into an agreed, overview analysis.

Many organisations were challenged to consider how they determine what results constitute a 'good quality response'. No examples were found of organizations establishing criteria of success through dialogue with communities; and very few were found of organizations examining the process of a response as well as the outcomes. Yet these should be fundamental dimensions of accountability towards persons of concern, so that organisations don't simply use the veneer of 'participation' to validate decisions already taken.

3.12 BEING TRANSPARENT

Though transparency is understood as a dimension of accountability, organisations find it challenging. Transparency was generally regarded as an important aspect of accountability - to build trust and to help redress the power imbalance between the organisations and disaster-

affected persons. However, putting this into practice remains a challenge. Organisations tend not to have a systematic approach to information sharing. Attention needs to be paid to the type of information that is useful to disaster-affected persons; the likely 'cost' of not sharing information (in terms of trust or increased complaints); and which forms of communication are most appropriate to reach the largest population. Such issues are context-specific so they need to be addressed at the country level. Nevertheless, the peer review points to the following information as a minimum for affected persons:

- what is being planned (entitlement and/or service targets plus targeting criteria);
- how much money is allocated to these activities (respecting any confidentiality obligations);
- why decisions (e.g. to change plans during implementation) are made;
- periodic progress reports against both programming and budget targets (including evaluations).

A 'default' working approach developed through the peer review was to encourage organisations to share information unless there is a good reason not to do so. This would require a reasoned approach to withholding information, for reasons of security or respecting confidentiality for example.

The management of programme transitions or exits was a common challenge for organisations. Communication with the affected population is paramount so that the organisation's motivations and constraints are well understood. Otherwise, former beneficiaries may end up feeling abandoned or let down. This can undermine efforts to build ownership of and responsibility for future projects, as well as to hold organisations accountable for the impacts of their efforts. Communities should be involved in planning exit or transition strategies, ideally at the project planning stage, so that there is transparency about the time and resource constraints of the intervention.

3.13 BEING FAIR AND RESPONSIBLE WITH PARTNERS

Accountability cannot be delegated to partners. Working through partners and other 'intermediaries' was generally regarded as a challenge to ensuring accountability towards disaster-affected persons. Although details differed across the organisations, a common finding is that if accountability towards disaster-affected persons is delegated to implementing partners, then the 'donor' organisation cannot be said to be accountable to those persons unless it effectively conveys its accountability requirements to its partners and verifies that they are being put into practice. In delegating responsibilities and activities to partner organisations, accountability requirements need to be agreed, supported and monitored, as part of a clear demarcation of roles and responsibilities.

'Indirect accountability' is no accountability in practice, since responsibility cannot be simply delegated to those implementing the projects.

> *GOOD PRACTICE*
> Save the Children in Côte d'Ivoire underwent an exercise of developing a protection proposal for a major donor. Partners were very closely involved in all steps, including the formulation of the budget. Although the process was not without tensions, all country interviewees involved felt it had been a very valuable experience that had helped cement the quality of the partnerships.

'Partnership' is another word that can be a semantic hurdle, sometimes hiding imbalances of power rather than really expressing partnership. This is especially important since for several

participating organisations, partnership is at the heart of how they work, not only in extending their operational capability but also in building relationships and trust that allow them to work to common ends. This becomes especially marked in the confederated organisations (ACT, Caritas and the IFRC).

Critical questions for all the organisations are the extent to which firstly, they acknowledge the need for, and secondly, are willing to invest in, building the capacity of their partners (and indeed members for confederated organisations) to be better able to demonstrate accountability towards those they serve. Those organisations with a strong commitment to building the capacity of partners in their emergency preparedness work, see the benefits in terms of stronger accountability built in to emergency responses undertaken by those partners.

All participating organisations are struggling to determine how best to approach accountability through partners. How can they ensure that members, partners and intermediaries are accountable to both the disaster-affected populations and them (SCHR) that support them? The challenge is to create opportunities for dialogue based on mutual respect, understanding of shared needs and concerns, acknowledging their respective capabilities, and an openness to discuss how to respect the requirements attached to the funding received. The peer review has pointed to the need to include responsibilities and commitments concerning accountability towards disaster-affected populations in agreements between partners prior to working together – and ideally as part of an emergency preparedness process. These responsibilities may differ according to the (SCHR) organisation's objectives. Where the primary objective of the donating partner is to empower the operational partner in its humanitarian work, then the donating partner's monitoring may focus on the operational partner's capacity and internal systems. Where the primary objective is humanitarian relief, then the donating partner may monitor operational partners' performance directly, such as through end-user feedback.

3.14 INVESTING IN ACCOUNTABILITY

Although accountability is not simply about money, there are nevertheless costs associated with specific activities (like training, participatory assessments, managing feedback/complaints systems or evaluative exercises that actively involve disaster-affected persons). Staff time, skills as well as specific processes (such as complaints-handling) require resourcing. Some budgetary provision for these must therefore be made. How can we better secure these resources and re-balance accountability more towards disaster-affected persons and somewhat less towards donors, important though they are? By shifting the focus from the 'end state of being accountable' to the 'process of becoming more accountable',   programmes can be designed so as to give more opportunity for affected persons to inform and guide those decisions and programme actions that affect them. Accountability pursued as an additional initiative (a separate budget-line) is likely to be far less effective.

3.15 ADVOCATING FOR ACCOUNTABILITY

Even when such provisions are made, however, donors may not be wholly responsive. Staff from all organisations identified donor policies (as well as the reporting burden) as an impediment to their accountability towards disaster-affected populations. While most staff felt donors are amenable to accountable approaches, a minority (especially at country level) thought donors were more interested in the minutiae of project activities and expenditures. There seems to be a need to engage with donors, beyond simply asking for funds, to build appreciation as to why organisations are working in accountable ways. A structured conversation with the major humanitarian donors was proposed several times, to explore what can be done to alleviate the donor constraints as felt by programme staff. Ultimately, changes not only to the resourcing of

responses, but also the time-frames for required reporting and the type of monitoring information deemed important (i.e. recognising the relevance of qualitative indices on performance) would contribute to enhancing accountability to affected groups. The Good Humanitarian Donorship initiative offers an appropriate platform for this.

4   CONCLUSIONS

Each organisation experienced the timing of this peer review differently, which has some bearing on the degree of commitment to follow-up and continued learning. For about half the organisations, the peer review coincided with other internal and/or external processes thereby helping to support and reinforce what was already underway. For about third of the organisations, the peer review helped move accountability to disaster-affected persons higher up their list of priorities. For the rest, the peer review came at a time of major restructuring or repositioning, where staff were already overwhelmed with changes and uncertainties, so that the peer review felt more of a burden than a resource.

Some organisations understand not only the importance of accountability to disaster-affected populations, but also its implications: that accountability requires organisations to change the way they work, by creating a different relationship with persons of concern where the aim is to diminish the power disparity between them. These organisations are doing this by paying particular attention to dialogue and participation.

More generally, the term 'accountability' is not well-understood amongst staff, particularly at the level of country programmes. The term itself can frequently block individuals' understanding, so that accountability is kept at a distance, as policy-level rhetoric rather than a responsibility that needs to be acted upon. This points to the need for incremental and practical guidance on how organisations can realise their accountability to disaster-affected persons. Many participating organisations are referring to external initiatives and tools; and some are pursuing this internally. Either way, there seems to be genuine commitment to do more.

Complaint mechanisms are a specific gap for most organisations. All struggled to establish appropriate, inclusive, workable and effective complaints mechanism that all sections of an affected population could be reasonably expected to use. This is an area that several organisations need to address.

Another recurring challenge for organisations has been to provide feedback to disaster-affected persons on key decisions or learning, especially at the evaluation stage. The peer review exercise is a case in point, and provides opportunity for organisations to 'close the loop' and share findings with partners, affected groups that are still accessible, as well as staff.

Partnerships and membership relations pose specific challenges to promoting and ensuring approaches that are accountable to disaster-affected persons. There is an inherent tension between on the one hand, working in a relationship based on trust and mutual respect, and on the other, working to ensure that the relationship results in a good quality (accountable) response and where the accountability of the donating partner towards institutional donors is also respected. There seems to be no shortcut to dialogue and exchange to reach a level of shared understanding where both the above can be achieved. And that is one aspect of the ground work that should be done in advance (through preparedness measures), to maximise the potential for accountable approaches within a disaster response. However, for many of the organisations involved, such

dialogue and exchange is rare. The exceptions demonstrate the real added value in securing a stronger platform for responses that are accountable to affected groups.

Learning from the peer review points to the need for attention to both policies/systems and attitudes/behaviours, and for there to be an interaction between the two. Likewise, control and trust are often approached as competing concerns, yet examples show that trust can be built on *shared* control.

An important lesson for the SCHR is that the Red Cross/NGO Code of Conduct remains little-used, other than for those organisations that have explicitly integrated its provisions into other key policies or frameworks. Amongst staff that do understand the Code's provisions, there is a realisation that it offers a powerful framework for accountability to disaster-affected persons. Has the peer review helped harness enough momentum between participating organisations around accountability to consider framing any new commitments within the Code's Principles and provisions? Is there enough commitment to the Code to galvanise effort to promote its continuing relevance to humanitarian challenges more generally?

A final point that needs to be underscored is the strong spirit of humanitarianism that underpins the work of all the organisations. Individual staff make the personal choice and commitment to work in difficult contexts, and it is perhaps on this personal drive that accountability to disaster-affected persons rests most securely. The Peer Review is the start of the process; there is commitment from all the organisations to continue what has begun and to put in place measures that will strengthen and make more consistent the efforts that demonstrate organisations' accountability towards affected groups.

5 ANNEX: THE PEER REVIEW METHODOLOGY AND LESSONS ABOUT THE PROCESS

5.1 THE PEER REVIEW METHODOLOGY

A peer review is the examination of an organisation by other similar organisations. There are few examples of peer reviews in the humanitarian sector. Most of the experience resides with the OECD (Organisation for Economic Cooperation and Development), which has used peer review since its creation in 1960 to promote the process of learning across its bilateral donor members, by reviewing the development co-operation system of each. More recently the OECD has also integrated humanitarian aid systems in to its peer reviews. The OECD experience inspired the approach developed by the SCHR.

The SCHR is using peer reviews first and foremost to facilitate learning, in a spirit of openness and constructive critical analysis. Peer reviews create a safe space where sometimes difficult questions can be confronted both within and between organisations.

Following the 2002 scandal of sexual exploitation in humanitarian operations in West Africa, the SCHR conducted a first round of peer reviews on the prevention of sexual exploitation and abuse in 2003-2006,. Identifying best practices, sharing experiences and encouraging learning were part of the objectives. In January 2007, the SCHR Principals decided to embark upon a second peer review exercise, looking at accountability to disaster-affected populations.

The approach taken was similar to the first SCHR peer review, with the addition of field visits to strengthen the robustness of the approach and also with more emphasis on providing support and guidance on the approach.

The 9 participants were subdivided into three triads. Each participant was reviewed by the other two members of its group:

Group 1: March 08 – July 08	Group 2: Sept 08 – Feb 09	Group 3: Feb 09 – Jun 09
CARE	LWF	Caritas
Save the Children	Oxfam	ACT
ICRC	UNHCR	IFRC

The peer review process consists of the following steps:

- *Self-Assessments*

  Each group begins with self-assessments at the headquarters level and in two selected countries. A common set of questions guides this process of self-analysis. Guiding questions were provided under 5 core themes: Organisational Policies, Strategies and Commitment; Staff Capacity; Programming; Communications and Advocacy; and Organisational Learning.

- *Field visits*

  There then follow two country visits by a review team where the self-assessments (and key organisational policies/guidelines) are probed and explored more fully. The review team consists of staff from the three agencies of the triad (from outside the countries concerned) plus an independent facilitator. Each visit lasts about 15 days, with most of that time spent at project level. Agency staff, partners and persons affected by disaster are interviewed using different methods. Prior to departing the country, the review team presents their key

findings and preliminary recommendations to the country teams. Countries visited were Côte d'Ivoire, Haiti, Kenya, Nepal, Indonesia and Ethiopia.

- *Headquarters Visits*

  The HQ visits are then carried out, with 3 days per agency. The review team is composed of the staff that undertook the field visits, plus an independent facilitator. The visits consist of a review of core documents and interviews with 20-25 staff. These HQ visits provide an opportunity to put the country-level learning within a wider organisational context. Again, the review team presents their preliminary findings and recommendations before departure.

- *Reports*

  Reports were written following the country and HQ visits. Findings common to the 3 agencies were highlighted to promote continuing inter-agency dialogue. In addition, a rolling learning document was produced to capture lessons common to all organisations and was shared across the 9 organisations through the process. It culminated in this paper available for external audiences.

- *Peer review amongst the CEOs*

  Based on the agency reports produced by the review teams, the 9 CEOs then meet to discuss the findings, learning and recommendations. This is where the actual 'peer review' takes place. Each agency responds to its report and a discussion amongst the peers concludes with a set of priorities for each agency to follow up.

- *One year on*

  Agencies have to report on progress against the peer review findings and recommendations 12 months after the CEO discussion.

The coordination, management and facilitation of the peer review process is a very important element that has brought much strength to the approach, compared to the first SCHR peer review. Everyone involved in the peer review acknowledges that preparation is key. Much effort was put into developing guidance on methodology for the different stages of the peer review with support from technical focal points (1-2 individuals from each organisation). The role of the peer review facilitator was particularly useful in guaranteeing coherence and rigour to the approach. Agency point persons provided logistical support for the field visits.

The role of the focal points was particularly important in providing technical oversight and guidance to the process. Workshops were organised at the end of each group to capture lessons that benefited the next group. An internet-based virtual group was created to share information and documents between the focal points, the SCHR working group and the facilitator.

5.2   LESSONS ABOUT THE PEER REVIEW PROCESS

A key objective of the SCHR peer review was to "share best practices, challenges, and learning within and between members". Peer reviews create space for internal reflection, discussion and sharing amongst staff in a non-threatening environment. It is therefore important to reflect on whether the approach adequately enabled learning within and across the participating agencies and what could have been done differently to enhance learning[12].

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[12] This summary of lessons is based on feedback received by the Principals, the Focal Points, and some members of the SCHR Working Group as well as lessons that emerged from the workshops conducted at the end of each round

Learning between participating organisations

The peer review process was designed in a way to enable continuous improvements and learning: the first round was conceived as a pilot, since the previous peer review did not include field visits. It was followed by a learning workshop to capture the experiences from the pilot. A similar workshop was conducted after the second and last rounds. The production of a learning document permitted lessons from the peer review to be shared amongst organisations. To increase the sharing of lessons between organisations, the circulation of country and agency reports was broadened beyond the Principals. A key lesson from the process is that learning needs to be built in as par of the design.

Learning at different levels

The intention of the peer review was to support learning at the individual as well as organisational levels. Much effort was made to cover a broad range of stakeholders at country and HQ, (e.g. disaster-affected groups, staff, partners, governance) and from different positions within organisations.

The inclusion of field visits was perceived by all as a very useful step, compared to the first round of SCHR peer reviews. The introduction of a common section in the reports enhanced sharing of lessons, and at field level a joint verbal debrief was also given. However, it was generally felt that more detailed preparation for the field visits, including briefing the various stakeholders, would have supported more learning. Also, more attention is needed to facilitate continued on-the-ground learning. The involvement of field staff could have been maximised, with greater inclusion of affected populations in the process. The process remained relatively top-down and there was insufficient time allocated for preparing the focus groups.

Involvement of senior staff

The peer review is initiated by the CEOs and the leadership and organisational commitment they provide is crucial to the success of the peer review. In

A characteristic of the peer review exercise, noted by several participating organisations, is the critical need for senior staff members to engage with the peer review (for examples as members of the review teams). This allows staff in key positions to become aware, develop a better understanding, and sometimes become strong supporters of efforts to develop accountability to affected communities.

This level of engagement was supported by the key role of the focal points, who provided consistent support to the process, particularly in planning the field visits, and were crucial in assuring continuity in the process. Their promotion and communication efforts were directly linked to the level of buy-in to the peer review process from colleagues in their respective agencies.

Learning does not happen through the writing of a report

The report-writing was a significant burden in the process. Any future peer review should consider ways to minimise the writing-time, as report-writing is only one step in the process. The inherent risk is that due to the amount of energy spent in producing the report, organisations may see that it as the end game. Reporting progress to peers one year on is a key element in the process as well as the utilisation of some of the lessons emerging through the exercise.

Rigour of the method

From the experience of participating organisations, peer reviews, compared to audits or evaluations, are one of the methods most conducive to learning. A possible downside is the fact that it does not provide clear sets of evidence-based findings and recommendations. However, a certain level of triangulation through different data collection methods – self-assessment, individual interviews, focus group discussions, review of key documents, intense discussions and reflections amongst the inter-agency review team members – brought some rigour to the approach as did the peer review dynamic itself (i.e. "outsiders" in the teams looking at each agency's internal workings). Before embarking in such an exercise, it is paramount to have clarity on the type of evidence a peer review can offer, compared to other evaluative mechanisms.

Learning benefits of the exercise

The improvements introduced to the process, based on the lessons from the first SCHR peer review, had cost and time implications: the inclusion of field visits, the organisation of workshops between the 3 rounds, and the setting up of a group of focal points all contributed to increasing the costs and complexity of the exercise. While it is almost impossible to measure the learning benefits, as they happen over time and are sometimes intangible, the perception of the participants is important to capture: based on the feedback received, most organisations rated the learning benefits (learning vs. Cost) as being of relatively high value. However, there was also some criticism about the fact that much time was spent on process, with too little time for meaningful discussions between and within organisations. While preparation and clarity of the approach is key, there may be ways to simplify the exercise. A suggestion could be to devolve the authority for the country "case studies" to the country offices themselves.

It is also important to bear in mind that the learning benefit is largely proportional to the level of involvement and commitment from each participating organisation. The peer review itself cannot guarantee that learning happens. Ownership and institutional commitment at all levels are key pre-conditions of learning-success.

The diversity within SCHR membership also means that the learning benefits of the exercise varied amongst members. There are at least two key elements that are important to flag:

● Participating organisations had different levels of experience with accountability to affected populations: several are involved in HAP-International, some have developed accountability frameworks with clearly articulated policies and guidelines, and some have a growing body of field experiences. Other organisations had less experience with issues related to accountability. The learning benefits therefore can be quite different.

● Organisations that are part of a large network or a confederation, as for members of the third group (ACT, Caritas and IFRC), with limited management structures and relative autonomy of members had difficulties in reaching out to their members. This makes it more challenging for the exercise to be meaningful for the entire organisation. On the oppposite, other organisations saw a manifest benefit in the peer review exercise, with the learning benefits, in same cases, exceeding expectations.