

IASC Task Force 2 on Accountability to Affected People

Supporting donors' responsibility for greater accountability to people in crisis

**REVIEW OF DONOR AAP COMMITMENTS,
REQUIREMENTS AND RECOMMENDATIONS**

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Abbreviations

AAP	Accountability to Affected People	ICAI	Independent Commission for Aid Impact
ACFID	Australian Council for International Development	ICRC	International Committee of the Red Cross
BHA	Bureau for Humanitarian Assistance (USAID)	IM	Information Management
C	Certification	IOM	International Organisation for Migration
CAR	Central African Republic	IV	Independent Verification
CBPF	Country-based Pooled Fund	M&E	Monitoring and Evaluation
CERF	Central Emergency Response Fund	NGO	Non-governmental Organisation
CHS	Core Humanitarian Standard	ODI	Overseas Development Institute
DAC	Development Assistance Committee	OECD	Organisation for Economic Cooperation and Development
DEC	Disasters Emergency Committee	PBR	Payment by Results
DFAT	Department of Foreign Affairs and Trade	PSEA	Protection from Sexual Exploitation and Abuse
DFID	Department for International Development (now FCDO)	PRM	Bureau of Population, Refugees and Migration
DOS	Department of State	RC/HC	Resident Coordinator/Humanitarian Coordinator
DRC	Democratic Republic of Congo	SA	Self-assessment
ECHO	European Civil Protection and Humanitarian Aid Operations	SIDA	Swedish International Development Agency
ERC	Emergency Response Coordinator	SoHS	State of the Humanitarian System
FCDO	Foreign Commonwealth and Development Office	TF	Task Force
FPA	Framework Partnership Agreement	UN	United Nations
GB	Grand Bargain	UNHCR	United Nations High Commission for Refugees
GHD	Good Humanitarian Donorship	USAID	United States Agency for International Development
HCT	Humanitarian Country Team	WHS	World Humanitarian Summit
HPG	Humanitarian Policy Group (ODI)		
HQAI	Humanitarian Quality Assurance Initiative		
IASC	Inter-Agency Standing Committee		

1. Introduction to the review

This section provides a summary of the purpose and scope of the review; it describes the purpose and organisation of this report.

1.1 Introduction, purpose and scope of the review

1.1.1 Introduction and purpose

1. The Inter-Agency Standing Committee (IASC) Principals have called for the commitment of donors to put in place the required incentives for the system to be more engaging and responsive to the needs of affected people.¹ The Accountability to Affected People (AAP) Task force (TF) recognises that donors have a critical influence on the way organisations conduct their work. They have a powerful role in the drive for greater accountability to people in crisis, holding humanitarian actors to account, and incentivising course corrections based on engagement with affected people and their feedback. Donors can identify gaps, address administrative challenges and provide more predictable, systematic and flexible support for collective accountability to affected people. For this reason, the TF is developing a plan to engage with donors, working closely with the Grand Bargain (GB) Participation Revolution on the drive for greater AAP.
2. This review is the first stage of this process. It recognises that many recommendations have already been made, and has compiled a synthesis of these to affirm the work already undertaken. The review also included analysis of how donors are currently referencing commitments to AAP in their grant and partnership guidelines.
3. The ToR outlined three deliverables from the assignment:²
 - Meta review of donor related recommendations – a number of published reports on the humanitarian system have referred to the role of donors in accountability practices. This would consider these to produce a meta overview of the recommendations.
 - Review of current donors' practices on AAP – many donors are promoting AAP in their funding guidelines and partnership documents, in a variety of ways and approaches. This review would produce an overview of how donors are taking account of AAP. This would include the DAC donors, UN partnership guidance and other funding like the joint disaster appeals and pooled funds.
 - Synthesis report and recommendations for the Task Force and IASC to take forward. The consultant will be expected to discuss a draft report with the IASC TF group/workstream before producing the final version of the report.
4. A short overview of the approach and methods used for the review are provided in annex 2. A list of informants that participated in the review is provided in annex 4. A list of the evaluations which contain donor AAP recommendations is provided in annex 3 of this report.

1.1.2 A brief note on the scope of the review

5. The ToR provides a very clear scope for the review. However, in practice, issues of accountability are inextricably intertwined with many other issues including localisation, inclusion and diversity, Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) and safeguarding among others. While this report is cognisant of the complexities that this presents, and the potential that

¹ Included in the definition of 'donors' are bilateral, multilateral, pooled funds as well as joint humanitarian disaster appeals. The research also incorporated intermediaries (UN and NGOs) as donors given the important leadership role they can play in funding collective AAP in addition to their role as donors to local actors. In both of these capacities, they have responsibilities for supporting, promoting and monitoring AAP practice.

² The ToR is reproduced in annex 1.

exists to incorporate many other themes, efforts have been made to stay true to the ToR; the limited duration of the consultancy and the clarity of the tasks outlined made this a necessary pre-condition if the brief was to be met.

- 6 The above said, one of the key findings of this review is that the evidence on collective AAP – what it is, what works, and what does not work - is scattered across a range of documents and people. It is also evidence for which knowledge – explicit, implicit and tacit – is diffuse and not held ‘*corporately*’ within the system. That so many people have their own ‘*truth*’ is one of the key challenges faced by those tasked with making change in this most complex area of humanitarian practice.
- 7 For this reason and with the purpose of the consultancy in mind – that of determining a shared agenda for the IASC and donors on collective AAP – it has been necessary for this report to first marshal, synthesize and present the evidence on the implementation of collective AAP as context for the delivery of the tasks that are outlined in the ToR (Section 2 of this report). It is only through understanding the current state of play with collective AAP, the challenges that exist and efforts that have been taken to address them, that it may be possible to offer forward-looking, evidence-informed analysis (Sections 3, 4 and 5 of this report).

1.2 Organisation of this report

- 8 The structure of the report is outlined below.
 - [Section 1](#) provides an introduction to the review and outlines the purpose and scope.
 - [Section 2](#) offers relevant background to the issues contained in the report, including IASC and Grand Bargain definitions and commitments, an overview of individual and collective accountability and a summary of relevant literature on the implementation of collective AAP.
 - [Section 3](#) summarises the analysis of donor AAP recommendations.
 - The focus of [Section 4](#) is on an analysis of donor AAP commitments and the requirements that donors have of the partners they fund. The section also provides a brief summary of recent evidence on donor funding practices.
 - [Section 5](#) summarises key findings from the interviews undertaken during the review. The focus of these is on the factors that influence donors’ engagement on collective AAP.
 - [Section 6](#) uses the collective AAP framework and a set of cross-cutting issues as lenses to assist in the identification of the role that donors can play in strengthening collective AAP practice.

2. Background and context

Given gaps in conceptual clarity among policy-makers and practitioners on issues of AAP, this section draws on interviews undertaken during the review as well as from the literature to outline and define key terms and the current state of play.

2.1 Definitions of AAP and Grand Bargain Commitments

9 The CHS defines accountability as *'the process of using power responsibly. It involves taking account of, and being held accountable to those who are primarily affected by the exercise of such power'*.³ The GB Participation Revolution Work Stream refer to the Core Humanitarian Standard's (CHS) concept of principled, accountable and high-quality humanitarian action that puts people at its heart⁴ and have agreed a practical definition of the meaning of *'participation'* (see figure 1).

Figure 1: The GB participation revolution commitment⁵

- We need to include the people affected by humanitarian crises and their communities in our decisions to be certain that the humanitarian response is relevant, timely, effective and efficient.
- We need to provide accessible information, ensure that an effective process for participation and feedback is in place and that design and management decisions are responsive to the views of affected communities and people.
- Donors and aid organisations should work to ensure that the voices of the most vulnerable groups, considering gender, age, ethnicity, language and special needs are heard and acted upon. This will create an environment of greater trust, transparency and accountability.

10 Importantly, the Workstream acknowledges that this *'implies clear and consistent communication to inform people affected by crises what has been learned from them and how follow-up action will address their concerns, where this is feasible. To be effective this ongoing dialogue requires action by senior decision makers based on information received.'*⁶

11 Implicit in these definitions are three core components of effective AAP; those of (i) information sharing with affected communities, (ii) feedback and complaints, and (iii) participation.

2.2 Why is AAP essential? To restore dignity, to uphold principles and to increase the effectiveness of assistance

12 The primary responsibility of humanitarian assistance is to people affected by crisis. For this reason, it is not just important, but necessary that it is instructed and directed by the people it seeks to assist, and that they guide the actions and measures of how the humanitarian system provides assistance and protection. Affected people are the sole reason that humanitarian institutions exist and hence how communities experience and perceive the work of these organisations is the most relevant measure of their performance. This alone necessitates that AAP is non-negotiable.⁷

³See <https://www.chsalliance.org/accountability-to-affected-people/#:~:text=Accountability%20to%20Affected%20People%20is,the%20exercise%20of%20such%20power.>

⁴ The CHS defines accountability as the process of using power responsibly, taking account of, and being held accountable by, different stakeholders, and primarily those who are affected by the exercise of such power. <https://corehumanitarianstandard.org/files/files/CHS%20in%20English%20-%20book%20for%20printing.pdf>

⁵ Grand Bargain Participation Revolution Workstream (2017) *Agreed, practical definition of the meaning of 'participation' within the context of this workstream*, March 2017.

⁶ Ibid.

⁷ IASC (2022) *Statement by Principals of the IASC: Accountability to Affected People in Humanitarian Action*, April 2022.

- 13 While these reasons are sufficient to justify the importance of accountability, there has long been evidence of a link between accountability mechanisms and improvements in the relevance, effectiveness, efficiency and sustainability of projects from research undertaken in 2013 (see figure 2).⁸

Figure 2: Improving impact: the link between accountability and programme quality⁹

Relevance - strengthening the targeting and quality of assistance: Accountability mechanisms improved the targeting of assistance, the nature of supported interventions and the location of services. Community participation provided agencies with a better understanding of local vulnerabilities and increased the usefulness of projects to communities.

Effectiveness - promoting trust, empowerment and acceptance, and addressing mismanagement: Accountability mechanisms have strengthened trust between agencies and project participants and highlighted the link between community participation and ownership. The research revealed evidence of increased empowerment and self-esteem among project participants...Accountability mechanisms made a contribution to 'trust dividends' with communities in insecure environments, and there was an associated reduction in violence against staff and increased attention paid to fraud and mismanagement.

Efficiency – optimising the use of resources and promoting value for money: Community involvement in procurement can increase programme efficiency. Where communities had been empowered to monitor contractors, there was greater attention paid to issue of efficiency and value for money.

Sustainability – enhancing community ownership of projects: A link was identified between the participation of a community in projects and perceptions of its sustainability. The case studies demonstrate that participation can increase the relevance of projects to their context and strengthen a community's ownership of processes and results.

- 14 Evidence of the links between AAP and programme effectiveness was further endorsed in the findings of the 2022 State of the Humanitarian System (SoHS) report¹⁰ which found that:

- Affected communities who were consulted about the aid they receive (only 33% of the 4,000+ surveyed for the SoHS) were **2.2 times** more likely to say that aid addressed their priority needs, **2.7 times** more likely to say that the aid they received was of good quality and **2.5 times** more likely to say that the amount of aid was sufficient.
- Affected communities surveyed who said they were able to provide feedback or complain were **1.8 times** more likely to find the aid they received relevant to their most important needs, **2.5 times** more likely to say that the aid they received of good quality and **2 times** more likely to say that the amount of aid was sufficient.

2.3 What do crisis-affected people say about AAP? an enabling AAP policy environment, but patchy performance by humanitarian agencies

- 15 In the years since the World Humanitarian Summit (WHS) and GB, there has been a growing acknowledgement of the importance of AAP which has been matched by policy commitments, however, AAP has long been considered an area where the collective humanitarian community has fallen well short of its aspirations. While there is a lack of consistent evidence, the findings of successive iterations of the State of the Humanitarian System (SoHS)¹¹ and the Humanitarian

⁸ Featherstone, A. (2013) *Improving impact: do accountability mechanisms deliver results?* Research undertaken on behalf of Christian Aid, Save the Children and Humanitarian Accountability Partnership, June 2013.

⁹ Ibid.

¹⁰ Obrecht, A., Swithern, S. and Doherty, J. (2022) *The State of the Humanitarian System, 2022 Edition*, September 2022.

¹¹ The State of the Humanitarian System is a recurring report that was first published by ALNAP in 2010 and is updated every two or three years. The report summarizes the humanitarian system and analyses successes and failures in the delivery of humanitarian aid, with frequent comparison against humanitarian principles. See <https://sohs.alnap.org/>

Accountability Report¹² act as a barometer of opinion on the performance of the humanitarian community in meeting its AAP obligations (figure 3).

Figure 3: Findings of the 2010, 2012, 2015, 2018 and 2022 editions of the SoHS report related to AAP

2012 edition: Despite recent pushes in the humanitarian sphere for accountability and transparency, people’s knowledge of the aid process – who is entitled, what they are entitled to, how they can access it and who to contact if they encounter problems accessing it – is often still inadequate. Disaster-affected persons are rarely given opportunities to assess the impact of interventions and comment on performance.¹³

2015 edition: 44% of surveyed recipients reported not having been consulted by aid agencies on their needs prior to commencement of the aid programming, while only 33% said they had been (23% didn’t know). The agencies fared somewhat better on communicating with their recipients once programming began, to solicit their feedback and complaints (with more recipients in all three countries reporting that they had been consulted than had not); however, only 19% of those that had been consulted said that the agency had acted on this feedback and made changes.¹⁴

2018 edition: A number of areas where improvement is needed, many of which were noted in the 2012 and 2015 editions of the SOHS, are still largely overlooked. These include... incorporating the views and feedback of crisis-affected people into programme design; making programmes more context-specific and more adaptable to changes in context; and preventing abuse and exploitation in humanitarian programmes.¹⁵

2022 edition: Overall, [however], there has not been a system-wide shift in how humanitarians engage with crisis-affected people or support their dignity. Aid recipients reported little improvement in communication, consultation or feedback... There was little sign of agencies using feedback to adapt projects or providing meaningful opportunities for community decision-making. Many humanitarian practitioners are aware, and critical of, the limited opportunities they can offer for including affected communities in design and decision-making, and increasingly recognise that changes in mindset are required. But wholesale changes to practice lag behind. The ‘*participation revolution*’ is still in waiting.¹⁶

2.4 Steps taken towards a system-wide approach to AAP

16 While the accountability of individual agencies to those they seek to assist has long been acknowledged (although often poorly executed), system-wide or collective accountability is a more recent concept. This has been articulated through a number of commitments including the 2014 Core Humanitarian Standard (CHS),¹⁷ the ‘*participation revolution*’ envisioned under the 2016 GB¹⁸ and the 2017 IASC Commitments on Accountability to Affected People.¹⁹ Most recently, these commitments have been re-stated by the IASC Principals in their April 2022 Statement on ‘*Humanitarian Accountability to Affected People in Humanitarian Action*.’²⁰

17 Despite the gap between the AAP aspirations of the humanitarian system and the feedback received from crisis-affected people being a consistent feature of system-wide research and evaluations, it is important to recognize that recent progress has been made in more clearly

¹² <https://www.chsalliance.org/get-support/resource/har-2022/>.

¹³ Taylor, G. et al. (2012) *The State of the Humanitarian System, 2012 Edition*, July 2012.

¹⁴ Stoddard, A. et al. (2015) *The State of the Humanitarian System, 2015 Edition*.

¹⁵ Knox-Clarke, P., Stoddard, A. and Tuchel, L. (2018) *The State of the Humanitarian System, 2018 Edition*.

¹⁶ Obrecht, A., Swithern, S. and Doherty, J. (2022) *The State of the Humanitarian System, 2022 Edition*, September 2022.

¹⁷ <https://corehumanitarianstandard.org/files/files/CHS%20in%20English%20-%20book%20for%20printing.pdf>

¹⁸ <https://interagencystandingcommittee.org/a-participation-revolution-include-people-receiving-aid-in-making-the-decisions-which-affect-their-lives>.

¹⁹ <https://interagencystandingcommittee.org/iasc-revised-aap-commitments-2017-including-guidance-note-and-resource-list>.

²⁰ <https://interagencystandingcommittee.org/accountability-and-inclusion/statement-principals-inter-agency-standing-committee-iasc-accountability-affected-people>.

articulating a collective approach to AAP which is embedded in how the humanitarian system is led and functions (figure 4).

Figure 4: The Collective AAP Framework²¹

The Collective AAP Framework (the Framework) is a tool developed by the IASC to enable Resident/Humanitarian Coordinators (RC/HC) and Humanitarian Country Teams (HCT) to prioritize AAP and ensure that humanitarian programming is responsive to people’s needs. The Framework outlines five outcomes and related actions to seek out, hear and act upon the voices and priorities of affected communities. It is a tool to enable responsive and people-centred humanitarian action in support of local and national systems. The Framework promotes a coordinated approach to community engagement and participation, emphasising inclusion of affected people in decision making and evaluation.

- Coordinated needs assessment and analysis reflects all affected community groups’ information needs and communication preferences.
- Humanitarian response planning includes affected peoples’ voices.
- Funding and resources are in place to ensure a coordinated approach to information provision, community feedback systems and participation.
- Response implementation is coordinated and driven by informed community participation and feedback systems and is monitored and adjusted as needed.
- Evaluation and review of collective AAP actions and outcomes is coordinated, participatory and transparent to inform learning.

The Framework guides the HCT in the development and monitoring of an operational country-specific AAP Action. Under the leadership of the RC/HC, the Action Plan outlines key actions, timelines and responsibilities required to coordinate collective AAP. Together, the Framework and the Action Plan form a set of adaptable tools to guide in-country leadership on collective AAP.

18 It has taken time for the framework to be finalized, disseminated and for it to get the sort of traction it requires from humanitarian leaders and agencies alike, but there is now a growing evidence base about different implementation models in a range of contexts.²² This review gathered significant documentation on collective AAP practice from Afghanistan, Central African Republic, Indonesia, the Pacific Island of Vanuatu and Yemen and while a detailed analysis of these case studies is out of scope, it is clear that significant knowledge has been captured. Despite the growth in knowledge of collective AAP, implementation continues to lag behinds and the framework lacks traction in many humanitarian contexts.

2.4.1 Efforts taken to strengthen collective AAP practice

19 Efforts to improve operational learning and strengthen collective AAP performance were also assisted between November 2021 and September 2022 by a series of IASC co-facilitated workshops on collective AAP in four country contexts: Gaziantep (Syria cross-border response), Lebanon, Bangladesh, and Ethiopia. These pilots informed the development of tools and approaches which elevated the importance of AAP becoming a leadership priority requiring a strategic and inclusive approach being adopted. What arose from these lessons was the need for a framework built around four inter-connected pillars.

- An accountable and enhanced leadership;
- Supported by an inclusive system and architecture;

²¹<https://interagencystandingcommittee.org/system/files/2021-05/DRAFT-%20Collective%20AAP%20Framework%20-%20INTRODUCTION%2C%20April%202021.pdf>.

²² Over the last 3 years, there has been a burgeoning evidence base on the implementation of collective accountability in country contexts, developed in large part by CDAC and the Humanitarian Policy Group of the Overseas Development Institute, albeit with contributions from a range of other actors. This review alone collected evaluations, reviews and research reports on collective accountability mechanisms in Afghanistan, Central African Republic, Ethiopia, Indonesia, Lebanon, Syria, Yemen, among others.

- Building on existing good AAP practices and lessons learnt; and
- With quality resourcing available.

20 The stronger articulation of collective accountability at the leadership level, and the practical actions linked to it offer a much stronger proposition for operationalizing collective AAP.

2.5 Understanding the donor landscape for collective AAP²³

21 The fourth bullet point in the list above, that of ‘*quality resourcing*’ is a key factor for the establishment of collective AAP and it has also been one of the most difficult aspects to address. Issues of cost are particularly pertinent to this review since there has long been a lack of clarity about what AAP costs and how to finance it.

22 A recent report on donor financing of AAP the first study of its kind, makes a start in addressing this vexed issue by (i) providing a practical overview of the costs of different components of collective AAP, providing greater transparency on how much is needed for collectives to function effectively in different contexts, (ii) exploring trends in the current funding landscape around collective AAP and highlighting blockages, and (iii) identifying how collective AAP can be better supported through a range of funding mechanisms.²⁴

23 An examination of these issues is particularly prescient because they are helpful in busting some long-held myths about the costs associated with AAP and offer evidence about the effectiveness of different financing approaches. The research is also instructive because it explores a range of approaches that have been used to deliver collective AAP in different contexts. Key findings from the study that are relevant to this review are summarised below.

2.5.1 The cost of collective AAP

24 Collective approaches to AAP have varying costs depending on their management structure, components and location, as well as the continuity of funding and sustainability of these mechanisms. While these costs may vary widely, it is important to recognise these interventions are relatively inexpensive in comparison to the wider humanitarian response. A typology of interventions offers four different models, each of which has different financing requirements (figure 5).

Figure 5: Indicative budgets for different models of collective AAP²⁵

Name	Description and examples	Key cost drivers	Indicative cost
Minimalist collective approach	Relevant for: For small-scale, short-lived responses drawing on strong local governance with short-duration surge support. In-kind support from responding agencies. Examples: 2017 Hurricane Maria, Dominica And Sulawesi earthquake in Indonesia	NGO staff (Coordinator and Information Management [IM]) and perception surveys	< \$0.5m

²³ This section is drawn almost entirely on the analysis undertaken by ODI’s Humanitarian Policy Group which is presented in the report by Lough, O. and Spencer, A. (2020) *Funding Collective approaches to communication and community engagement in humanitarian action*, HPG/ODI October 2022. Because it is one of the few authoritative texts on collective AAP which is targeted at a donor audience, there is value in summarising some of the key findings so they can be considered in the context of this review.

²⁴ Lough, O. and Spencer, A. (2020) *Funding Collective approaches to communication and community engagement in humanitarian action*, HPG/ODI October 2022.

²⁵ Ibid.

Medium-sized collective approach	Relevant for: For large sudden onset natural hazard emergencies with quick scale-up and scale-down or medium-sized conflict settings. Coordination role plus common services and short/medium-term surge. Examples: 2019 Cyclone Idai in Mozambique, 2018 Kasai Crisis in DRC	P4 Coordinator (6-months), Coordination capacity (2-months), Inter-agency feedback system and media support	\$0.5m- \$1.5m
Maximalist collective approach	Relevant for: UN-led collective AAP embedded in extensive international response for a large-scale protracted crisis. Includes a substantial range of common services. Examples: Central African Republic, Bangladesh Rohingya response	P4 Coordinator and IM Officer, Needs assessment analysis, Common data analysis, Perception surveys, Support to local media, M&E	\$1.5m- \$2.5m pa
Preparedness approach	Relevant for: In support of locally-led coordination platforms and includes flexible funding for collectively identified priorities. Dedicated National staffing hosted by an NGO. Examples: Shonjog Platform in Bangladesh	National coordinator and IM, Flexible funding, Office support and travel	~\$0.5m (depends on scale of flexible funding)

25 The key finding from the analysis of costs is that when compared to the total cost of the response, collective AAP costs less than 1 per cent. This is supported by analysis which suggests that in CAR, collective AAP accounted for just 0.6 per cent of the 2020 HRP's \$400.8 million; for the Rohingya response in Bangladesh, the budget for the entire collective and non-collective AAP accounted for just under 1 per cent of the 2020 Joint Response Plan. To put this into context, guidelines from major humanitarian donors suggest that around 3-5 per cent of all project budgets should be dedicated to monitoring and evaluation.²⁶

2.5.2 The challenge of funding collective AAP

26 Informed by its analysis of country case studies, the ODI/HPG research identified some specific weaknesses linked to the provision of predictable funding for collective AAP. These include the following:

- Comparatively few donors are engaging systematically around collective approaches;
- Donors differ in their understanding of AAP and collective AAP;
- Scale and organizational culture are important determinants of how far donors engage with collective approaches with larger donors with a field presence often the most engaged. The modest scale of AAP budgets may fuel perceptions that they are administratively burdensome in comparison with large in-kind or operational programmes; and,
- The lack of evidence about the value of collective AAP have led to donor concerns about the efficiency of funding it. Other inhibitors include the need for time in order for collective AAP to mature and perform, and the limited visibility that donors may receive for their investment.

27 The implication of these challenges is not only that collective AAP often lacks adequate funding, but when funding is available, it is usually linked to a single donor and hence is very vulnerable to change or shifts in policy. On several occasions, a shift in donor priorities has significantly hobbled collective AAP as there are no obvious alternative sources of financing.

28 The challenge of limited donor engagement in funding collective AAP, also impacts on the potential for donors to burden-share, but also for donors to have a more prominent position or stake in driving collective AAP. In cases where donors adopt a more hands-off approach when

²⁶ Ibid.

delegating their support through intermediaries, the evidence suggests that there is a potential risk that these intermediaries may, if unchecked, co-opt or dominate the approach in ways that can stifle effective collaboration.

- 29 It is against this backdrop – where there are important opportunities to strengthen collective AAP, but where it is also important to acknowledge the past failures and the significant challenges to future success – that this review seeks to build on existing evidence and galvanise the actions and influence of donors to support collective action to prompt a shift in performance.

3. Analysis of donor-related AAP recommendations

This section provides a summary of the first outputs from the review - an analysis of donor AAP recommendations which are targeted at donors.

30 Included in the meta-review were over 80 evaluations, 27 of which included AAP recommendations. These 27 evaluations yielded 64 recommendations that were targeted at donors. These were analysed and grouped thematically into 5 categories and 16 sub-categories which are summarized in figure 6 below.²⁷

Figure 6: Summary analysis of donor recommendations in evaluation reports

Category	Sub-category	# recs.
Provision of flexible funding for collective AAP	Flexibility to adapt the assistance provided in a timely way	6
	The provision of flexible funding for collective AAP through the partnership chain	2
Provision of predictable funding for collective AAP	Coherent and flexible funding for collective AAP across the HPC	13
	Shared donor commitment to funding collective AAP	7
	The use, by large agencies of unearmarked funding for collective AAP	2
The need to support the participation of local actors in collective AAP	Funding of local actor participation in collective AAP	2
	Use of funding and influence to strengthen the inclusion of local actors in collective AAP	3
	Funding of local actors to strengthen capacity to participate in collective AAP	4
The need to invest in surge capacity for AAP	Funding of global surge capacity to support collective AAP	4
The use of donor funding to incentivise agency participation in collective AAP	Use of CHS verification as a means of assuring engagement in AAP	2
	Use of funding to incentivise participation in collective AAP	12
	Linking of funding to feedback of affected people	3
Other recommendations on collective AAP	The need to strengthen communication with donors on collective AAP and lobby for funding.	4
	Use of donor influence to strengthen leadership of collective AAP	2
	Importance of donor funding for collective AAP across the nexus	1
6 categories	15 sub-categories	67

3.1 Provision of flexible funding for collective AAP

- 31 Flexibility to adapt the assistance provided: It has long been acknowledged that for programmes to be responsive to the needs of affected people, agencies must be able to make changes to the assistance they are providing in response to the feedback they receive. This may be necessary to close the feedback loop and is a fundamental part of treating people with dignity. The requirement for donors is that funded agencies have recourse to make changes to the assistance they are providing, or that there are mechanisms in place that allow them to engage with their donors and make timely decisions on changing the type or nature of the assistance provided to meet the stated needs of people they are supporting to ensure its ongoing relevance.
- 32 A flexible approach to funding AAP activities: Also implied in this cluster of recommendations is the need for donors to take a flexible approach to how they fund AAP, particularly in new or rapidly escalating crises where it might be necessary to adapt or scale-up existing AAP approaches.

²⁷ The specific recommendations are listed, organised and synthesized in a separate XL worksheet.

- 33 Flexibility through the partnership chain: Similar claims of a lack of flexibility are made by local actors of UN and INGO intermediaries as they are of donors, with the caveat that local organisations often have less power than their international counterparts to influence decision-making.

3.2 Provision of predictable funding for collective AAP

- 34 Coherent and flexible funding for collective AAP across the HPC: The recommendation most frequently targeted at donors is the need to provide predictable, medium-term funding for a coherent approach, at scale, to collective AAP. It is often the case that donors cherry-pick specific aspects of collective AAP. It must be recognized that a single break in the AAP ‘chain’ (i.e., a lack of consultation during needs assessment or a failure to establish relevant feedback mechanisms) has implications for the effectiveness of the entire humanitarian response.
- 35 Consider collective AAP as a lifesaving activity: Collective AAP has been considered a ‘nice to have’ rather than a prerequisite for timely, relevant and effective assistance in humanitarian response. There is a need for attitudinal and policy change in order to unlock the type of funding required to ensure predictability. This is an area where donors can influence agencies – the argument being that if donors prioritise funding AAP, then it is more likely that aid providers will similarly do so.
- 36 Shared donor commitment to funding collective AAP: Core collective AAP activities are often predominantly supported by a single donor which makes them extremely vulnerable to shifts in staffing, policies or budgets. To address this, it is important that donors prioritise collective AAP and that there is a level inter-donor coordination which ensures that all aspects of collective AAP are funded.
- 37 The use, by large agencies, of unearmarked funding for collective AAP: There is an acknowledgement that large UN agencies and INGOs receive unearmarked funding and that they have scope to use this in support of collective AAP. This will also role-model agencies’ prioritisation of collective AAP.

3.3 The need to support the participation of local actors in collective AAP

- 38 Funding of local actor participation in collective AAP: Local actors frequently receive insufficient funding or insufficiently flexible funding to permit them to support internal AAP or engage in collective AAP mechanisms.
- 39 The use of funding and influence to strengthen the inclusion of local actors in collective AAP: Linked to the issue above, there is an acknowledgement that AAP should be embedded in the local context and are ‘built from the ground up’. As part of this, local actors should be at the forefront of collective AAP and both participate, but also play a leadership role.
- 40 The funding of local actors to strengthen capacity to participate in collective AAP: There is a need to ensure that there is adequate financial support for local NGO capacity building and leadership development in order for them to lead, own and participate in collective AAP.

3.4 The need to invest in AAP surge capacity

- 41 Funding of global surge capacity to support collective AAP: Given the human resource and technical capacity requirements of collective AAP, it is important that global surge capacity exists

and is funded, both for rapid onset crises, but also for backstopping and supporting collective AAP in existing operations.

3.5 The use of donor funding to incentivise agency participation in collective AAP

- 42 The use of CHS verification²⁸ as a means of assuring engagement in AAP: A strong commitment by agencies to hold themselves to account is a necessary precursor to their participation in collective AAP. The CHS is an important foundation for collective AAP. Together, the Nine Commitments of the CHS provide a coherent and integrated accountability framework to help organisations assess, measure and continuously improve their performance and accountability towards the people and communities they support.²⁹ The requirement of CHS verification by donors would provide assurance of agency commitments to accountability.
- 43 The use of funding to incentivise AAP: The second largest pool of recommendations after predictable funding are focused on the need for donors to ‘incentivise’ agencies’ participation in common and collective AAP. A range of incentives are proposed, some of which are already being implemented by a small number of donors (including pooled funds) – the requirement of agency AAP strategies as a pre-condition for funding; presentation of evidence of consultation with communities on their needs is another.
- 44 Linked to this are a more general set of recommendations about the need for donors to be more explicit about their AAP expectations of funded partners. Several recommendations emphasize the need to incorporate commentary on AAP as part of donor reporting requirements and the use of indicators to evidence this. Two recommendations propose the adoption of CHS indicators for this task for reasons both of familiarity and consistency. The 2021 Independent Review of the GB offers the most compelling justification for greater donor oversight, reporting that ‘*without a radical shift in approach, combining a top-down drive from donors and senior leaders with a focus on change at the country level, it is hard to see what collective progress can be made by signatories in regard to the participation revolution by June 2023.*’³⁰
- 45 Linking of funding to feedback of affected people: The most radical recommendations on incentivising agencies to establish their own AAP mechanisms (as opposed to participating in collective AAP) suggest the use of conditionalities, such as making funding conditional on proof of ‘*beneficiary satisfaction*’. An important caveat is stated in one of the recommendations, that it is important that donor requirements do not become a ‘*tick box*’ exercise.
- 46 With the IASC now having clarified the leadership responsibilities of the RC/HC³¹ and HCT³² for collective AAP, one recommendation proposes that the delivery of these responsibilities should be independently monitored and reported and that performance used as an incentive for improving practice.
- 47 Still on the theme of independent monitoring, a broad set of recommendations urges donors to support independent analysis of feedback and complaints as part of a shift towards a demand driven humanitarian model. The assumption here is that people are far more likely to provide

²⁸ <https://www.chsalliance.org/get-support/resource/chs-verification-scheme-overview/>.

²⁹ <https://corehumanitarianstandard.org/the-standard>.

³⁰ Metcalfe-Hough, V. et al (2022) *The Grand Bargain in 2021. An Independent Review*, June 2022.

³¹ See <https://rchc-handbook.unocha.org/chapter-a.html>

³² See IASC (2017) *Standard Terms of Reference, Humanitarian Country Teams*, February 2017.

honest feedback to an independent feedback mechanism than they are to one that is managed and scrutinized by the agency that is providing the assistance.

3.6 Other recommendations on collective AAP

- 48 The need to strengthen communication with donors on collective AAP and lobby for funding: Several recommendations highlight the importance of establishing dialogue with donors on the need for coherent and consistent support for collective AAP. Attention is also placed on ensuring that there is a common understanding of concepts, terms and approaches. Ultimately, collective AAP requires a common ask from the members of the humanitarian system.
- 49 The use of donor influence to strengthen leadership of collective AAP: Acknowledging that challenges in ensuring high quality systems of collective AAP can come from within the humanitarian system itself, two recommendations request that donors use their power to influence heads of agencies to support and participate in inter-agency efforts. As a counterpoint to this, it is also recommended that through their funding, donors should avoid placing too much power in the hands of a single agency and that collective AAP mechanisms are themselves managed and implemented collectively.
- 50 The importance of donor funding for collective AAP across the nexus: An issue that is prevalent in the literature, but less so in the recommendations, is the importance that collective AAP is not considered only during crises but also before they hit, as part of preparedness activities, but also once they are over when development donors take over and longer-term financing mechanisms are established.

4. Donor AAP commitments, requirements and funding practices

The focus of this section is on the second task outlined in the ToR, an analysis of donor AAP commitments and the requirements that they have of the partners they fund. This analysis is complemented by a summary of donor funding practices for collective AAP which is largely drawn from the HPG/ODI research, supplemented by relevant findings from this review.

4.1 Towards a typology of donors through the lens of AAP commitments and requirements

51 While it is a simplification, the review of donor AAP commitments and requirements suggests there are three broad categories of donors. This typology is outlined in figure 7 below.

Figure 7: Towards a typology of donor AAP commitments and requirements

Typology	AAP commitments and requirements
Tier 1: Commitments and explicit requirements	<p>Commitments include:</p> <ul style="list-style-type: none"> Good Humanitarian Donorship initiative (GHD), GB, CHS, IASC AAP. <p>Funded partner requirements may include:</p> <ul style="list-style-type: none"> CHS commitment, self-assessment or external verification; Existence of an AAP Plan; Specific reference made to AAP in partner funding manual; Reporting against specific protection/AAP indicators; AAP performance included into Payment by Results; Have made prior funding commitment to collective AAP at a country-level; Monitoring of requirements by donor field-based staff.
Tier 2: Commitments and 'quality' partners	<p>Commitments include:</p> <ul style="list-style-type: none"> Donor commitments to GHD and GB. <p>Funded partner requirements may include:</p> <ul style="list-style-type: none"> A notional commitment to the CHS; Reference to a rights-based approach, or a broader focus on gender and inclusion, rather than an explicit reference to AAP; No specific planning documents or reporting requirements; Limited scope for thematic funding of collective AAP, but potential for financing through existing partners; Limited scope for field monitoring or follow-up.
Tier 3: Notional commitments	<p>Commitments include:</p> <ul style="list-style-type: none"> References to donor commitments may not be explicitly made. <p>Funded partner requirements may include:</p> <ul style="list-style-type: none"> No explicit reference made to partner AAP requirements; No capacity for follow-up.

52 A more detailed analysis of donor AAP commitments and requirements is provided in the two sections below (see section 4.2 and section 4.3 respectively).

4.2 Analysis of donor AAP commitments

53 Signed on donor commitments are relatively modest in number with the majority of donors signed on to the GHD Initiative and many having a stated commitment to the GB. Figure 8 below provides a summary of the relevant AAP commitments and an overview of donor members.

Figure 8: Donor AAP commitments

Commitment	Reference to AAP
Good Humanitarian Donor Initiative	<ul style="list-style-type: none"> ▪ General Principles - Commitment 7: Request implementing humanitarian organisations to ensure, to the greatest possible extent, adequate involvement of beneficiaries in the design, implementation, monitoring and evaluation of humanitarian response. ▪ Good practices in donor financing, management and accountability: Funding - commitment 12: Recognising the necessity of dynamic and flexible response to changing needs in humanitarian crises, strive to ensure predictability, and flexibility in funding to the UN agencies and programmes and to other key humanitarian organisations. ▪ Promoting standards and enhancing implementation - commitment 15: Request that implementing humanitarian organisations fully adhere to good practice and are committed to promoting accountability, efficiency and effectiveness in implementing humanitarian action.
GHD donor Signatories	42 members including most of the largest bilateral donors and the European Commission ³³
The Grand Bargain	<p>Actual commitments agreed by Grand Bargain Sherpas: Aid organisations and donors commit to:</p> <ul style="list-style-type: none"> ▪ Improve leadership and governance mechanisms at the level of the humanitarian country team and cluster/ sector mechanisms to ensure engagement with and accountability to people and communities affected by crises. ▪ Develop common standards and a coordinated approach for community engagement and participation, with the emphasis on inclusion of the most vulnerable, supported by a common platform for sharing and analysing data to strengthen decision-making, transparency, accountability and limit duplication. ▪ Strengthen local dialogue and harness technologies to support more agile, transparent but appropriately secure feedback. ▪ Build systematic links between feedback and corrective action to adjust programming. <p>Donors commit to:</p> <ul style="list-style-type: none"> ▪ Fund flexibly to facilitate programme adaptation in response to community feedback. ▪ Invest time and resources to fund these activities.
Grand Bargain 2.0	<p>Donors and aid organisations commit to:</p> <ul style="list-style-type: none"> ▪ Improve leadership and governance mechanisms of the HCT and clusters/sectors. ▪ Develop common standards and a coordinated approach for community engagement and participation. ▪ Strengthen local dialogue and feedback. ▪ Build systematic links between feedback and corrective action to adjust programming. <p>Donors commit to:</p> <ul style="list-style-type: none"> ▪ Fund flexibly to facilitate programme adaptation in response to community feedback. ▪ Invest time and resources to fund these activities.
GB donor signatories	65 Signatories which includes 25 bilateral donors and the European Commission (as of October 2022) ³⁴
Core Humanitarian Standard	<p>The CHS is an accountability framework based on Nine Commitments to People in Crisis – with Commitments 4 and 5 of particular relevance:</p> <ul style="list-style-type: none"> ▪ Commitment 4: Communities and people affected by crisis know their rights and entitlements, have access to information and participate in decisions that affect them. Quality criterion - Humanitarian response is based on communication, participation and feedback. ▪ Commitment 5: Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints. Quality criterion - Complaints are welcome and addressed.
CHS Associate Members	ACFID (2015) DFAT (2017) Disasters Emergency Committee (2018,) FCDO, (2016) Royal Danish Ministry of Foreign Affairs (2015), Sida (2015) ³⁵

³³ <https://www.ghdinitiative.org/ghd/gns/about-us/our-members.html>.

³⁴ https://interagencystandingcommittee.org/system/files/2022/10/The%20Grand%20Bargain%20Signatories%20October%202022_1.pdf.

³⁵ <https://www.chsalliance.org/about/our-members/>.

- 54 As is evidenced by the table above, through their participation in the GHD Initiative (42 bilateral donors and the European Commission), many of the OECD/DAC donors have made quite far-reaching commitments to AAP. In saying this, it is important to acknowledge that these are not commitments per se but are termed ‘*general principles and good practices*’ that promote a more coherent and effective system for financing and supporting principled humanitarian action. To this end, they are designed to raise the collective bar rather than requiring each GHD donor to adhere to the practices.
- 55 While the GHD does promote a small number of issues that are considered to demand a harmonized approach across all donors in order to achieve the desired gains for the international humanitarian system, the general principles and best practices associated with AAP do not figure among these.³⁶
- 56 The GHD AAP Commitments are buttressed by the undertakings outlined in the GB, which 25 bilateral donors and the European Commission are signed up to. Once again, as and of themselves, these provide a suite of good practices which are entirely consistent with the IASC’s Commitments and guidance on collective AAP.
- 57 However, as for the GHD, the annual self-reporting exercise leaves plenty of scope for Signatories to focus on those Commitments where the most progress has been made, and so while 97% of Signatories submitted reports in 2021-2022, few offered any significant detail about what tangible actions had been taken to further the Participation Revolution.³⁷ In this regard, the response of most donor Signatories may at best be described as broad. Many tended to focus on localisation at the expense of participation, which likely contributed to the assessment of the Independent Report that ‘*efforts to elevate participation as a system-wide priority have as yet had any substantive impact in shifting ways of working*’.³⁸
- 58 Where donor Signatories’ reports did comment on AAP, the overwhelming focus of such activity was – as in previous years – on the establishment of mechanisms to receive feedback and manage complaints about aid programmes with scant evidence on how this feedback is used to inform programming decisions, or how the views of affected populations are factored in from the outset of a programme or project design phase.³⁹
- 59 It is noteworthy that a handful of donors are now members of the CHS. While they are not eligible to become full members, associate membership requires that entities are consistent with, and supportive of, the vision, mission and objectives of the CHS Alliance. Associate members are required to provide annual feedback on how the organisation uses, and learns from, the CHS; they must complete a CHS alignment statement and have an external complaints mechanism in place.⁴⁰

4.3 Analysis of AAP requirements of donor-funded partners

- 60 As outlined in the summary table above, donors have increasingly referred to AAP in their partnership guidelines in addition to making specific AAP requirements of their funded partners.

³⁶ The issues listed as requiring a harmonized approach by donors may be found at <https://www.ghdinitiative.org/ghd/gns/best-practices.html>.

³⁷The 2021-22 self-reports for GB Signatories can be found at the following link: <https://interagencystandingcommittee.org/grand-bargain-official-website/grand-bargain-self-reporting-exercise-2021-2022>.

³⁸ Metcalfe-Hough, V. et al (2022) *The Grand Bargain in 2021. An Independent Review*, June 2022.

³⁹ Ibid.

⁴⁰ See https://d1h79zlgfht2zs.cloudfront.net/uploads/2020/04/CHSA_Membership_Pack-2022.pdf.

While there are no requirements that are universally applied, and there is a high degree of variability between donors, there is a growing body of good or promising practice, some of which is highlighted below.

- 61 **CHS Commitment, external verification or self-assessment:** There are a number of potential advantages to donors of making CHS a requirement for their funded partners that go well beyond the benefits it may afford to strengthening AAP.⁴¹ Denmark and the UK’s Disasters Emergency Committee (DEC) have made the CHS and external verification mandatory. The biennial Humanitarian Accountability Reports now track progress against the Commitments, that shows a tangible improvements in organizations undergoing verification. There is a steady increase in donor formally acknowledging CHS verification over the years (see figure 9).

Figure 9: Recognition of CHS by donors for their funded partners.⁴²

Donor	Type of assurance against the CHS for funded partners	Independent Verification (IV), Certification (C), Self-assessment (SA)
DEC	Independent quality assurance against the CHS is a prerequisite	IV and C
Denmark’s DANIDA	Independent quality assurance against the CHS is a prerequisite	IV and C
Dutch Relief Alliance	Independent quality assurance against the CHS is a prerequisite (before 2023 all 3 verification options were accepted).	IV and C
DG ECHO	Humanitarian Quality Assurance Initiative (HQAI) is accepted as an ECHO ex-ante Framework Partnership Agreement (FPA) auditor.	IV and C
DG ECHO	FPA auditors other than HQAI may use HQAI audit information to fill the ECHO ex-ante FPA	IV and C
Germany	Acceptance of any of the 3 CHS Verification options to shorten partner capacity assessment.	SA and IV and C
Irish Aid	CHS self-assessment was a minimum requirement for partners to apply for and obtain funding under Irish Aid’s new multi annual funding scheme ‘Ireland’s Civil Society Partnership for A Better World’ for Irish based International NGOs.	SA and IV and C
UK’s FCDO	“FCDO encourages all partners to obtain certification of adherence to the CHS by the Humanitarian Quality Assurance Initiative.”	C (although no formal requirement)

- 62 **Evidence of an AAP plan:** The review discovered the requirement by a small number of donors of an AAP plan by funded partners, the purpose of which was to provide a level of assurance, not only of a commitment to AAP, but of a tangible plan of how this would be implemented across funded projects. The Department of State’s (DOS) Bureau of Population, Refugees and Migration (PRM) has set a high bar by requiring that funded agencies (both NGOs and core partners) have organisational AAP frameworks in place (see figure 10). At an operational level, the Country Based Pooled Funds (CBPF) collect and report on the implementation of complaints and feedback mechanisms and use fund-level performance indicators track progress and investment on AAP.

- 63 In 2021, 72 per cent of all CBPF-funded projects included accessible and functioning feedback processes or complaint mechanisms for affected people, while another 23 per cent partially included these practices. 5 per cent did not include these provisions.⁴³ The Annual Reports for the

⁴¹ An average of 80% of donor due diligence requirements are covered by the information collected during CHS certification which has the potential to reduce duplication and offer significant cost-savings as a consequence.

⁴² <https://www.hqai.org/en/our-work/donor-due-diligence/>

⁴³ <https://www.unocha.org/our-work/humanitarian-financing/country-based-pooled-funds-cbpf/cbpf-annual-reports-2021>.

Central Emergency Response Fund includes similar data; 71 per cent of CERF-funded projects in 2019 provided evidence of ensuring the participation of affected people in decisions about project design and delivery. 24 per cent of CERF-funded projects in 2019 provided evidence of giving the affected people access to closed-loop complaint and feedback mechanisms, which were accessible to all members of the affected communities, inclusive of gender, age, illiteracy and disability.⁴⁴

Figure 10: Promising practice – DOS PRM⁴⁵

The Bureau of Population, Refugees and Migration (PRM) takes a number of measures to ensure implementing partners have access to PRM’s expectations and requirements for regularly collecting and responding to beneficiaries’ feedback, as outlined below:

Organizational AAP Frameworks: PRM-funded NGOs and international organizations (IOs) must also have an AAP Framework in place in order to receive PRM funding. These frameworks outline the organization’s approach to the collection and use of beneficiary feedback during the program design and implementation phases.

UN High Commissioner for Refugees (UNHCR) and PRM Framework Agreement: The 2020-2021 agreement states that UNHCR will (i) strengthen its commitments to refugee women and girls and AAP through the implementation of its Age, Gender and Diversity Policy, which includes a global implementation and monitoring plan; (ii) Regularly collect, analyze, and use feedback obtained directly from persons of concern to affect the quality and relevance of UNHCR’s assistance. UNHCR will seek and consider such feedback in program design, implementation, monitoring and evaluation as well as in its budget planning and prioritization, review, and re-prioritization. Further, UNHCR will provide feedback on such decisions directly to the affected population, ensuring transparency through communication, in line with its AAP work.

AAP by Other PRM International Organization Partners: In addition to UNHCR, PRM expects its other international Organisation partners, such as the International Committee of the Red Cross (ICRC) and the International Organization for Migration (IOM), to demonstrate that they are implementing the commitments outlined in their AAP Frameworks and are reporting on the same. In June 2020, ICRC published its Accountability to Affected People Institutional Framework, which consolidates ICRC’s approach to AAP in its humanitarian response to maximize impact. Similarly, IOM’s 2020 Accountability to Affected Populations Framework establishes IOM’s common approach for implementing and mainstreaming AAP throughout its crisis-related work and helps to ensure quality and responsive programming in line with the evolving needs of affected populations and communities.

64 Specific reference made to AAP in partner funding manuals: The funding guidelines of a number of donors make explicit reference to AAP and include these in assessment criteria for potential partners (see figure 11). In a similar way to DG ECHO, FCDO’s proposal assessment criteria includes questions about how communities have been consulted and existence of complaints/feedback mechanisms, how this operates, confidentiality, coordination with the wider humanitarian system and whether adequate budget has been provided. It includes questions about how information will be shared with the community and examination of barriers to participation of specific groups, particularly women.⁴⁶ As an intermediary, UNHCR’s partnership guidelines define accountability, outline an AAP approach and emphasize commitments to relevant IASC reference documents.

Figure 11: Promising practice – DG ECHO⁴⁷

DG ECHO’s Single Form, which is a core part of all funding applications contains explicit reference to AAP and accountability commitments:

⁴⁴ <https://cerf.un.org/document/cerf-annual-results-report-2020-edition>.

⁴⁵ <https://www.state.gov/other-policy-issues/accountability-to-affected-populations/>.

⁴⁶ <https://www.gov.uk/guidance/humanitarian-response-funding>.

⁴⁷ <https://www.dgecho-partners-helpdesk.eu/reference-documents-ngo>.

Beneficiary accountability: the Form contains a specific section which requires an assessment of how accountability to beneficiaries is concretely implemented. The partner must explain how and by what means the beneficiaries and affected populations have been and will be involved in the design, implementation and monitoring of the Action. Particular attention must be paid to the involvement of diverse groups (gender, age, persons with disabilities, and any other relevant diversity groups). In exceptional cases, when it was not possible to involve certain groups of beneficiaries, the partner has to explain why.

Complaints: The partners must describe the complaint mechanism put in place to collect beneficiaries' feedback, including the organisation of the process, the tools used, etc.

Engagement in IASC Collective action: Partners should make every effort to ensure they contribute to a coordinated humanitarian response by engaging fully in the Humanitarian Programme Cycle, including participation in contingency planning, coordination of assessments, and collective analysis.

65 **Reporting against specific AAP indicators:** Two of the donors that participated in the review include specific AAP indicators that funded partners must report against. USAID's Bureau for Humanitarian Assistance (BHA) has a set of AAP monitoring questions which partners are required to report on (see figure 12). In a similar way, DG ECHO have eight mandatory questions and seven follow-up questions which should be mainstreamed into partners M&E processes and discussed during one-to-one interviews with affected people; these include specific indicators on accountability, participation and empowerment. ECHO requires updates at monitoring, interim and final report stage. The survey tool must be included in the eSingle Form⁴⁸ as a source of verification. Monitoring must include feedback received and corrective measures taken by different population groups.⁴⁹

Figure 12: Promising practice – USAID BHA⁵⁰

Monitoring requirement: Monitoring questions include the following (i) Explain how your feedback mechanism will collect, monitor, promptly address, and incorporate beneficiary feedback throughout the activity, (ii) Explain how your feedback mechanism will improve the quality of programming, (iii) describe your plans to share monitoring results with beneficiaries and address any linkages to your AAP Plan. (iv) Describe how you will integrate the system for managing feedback (e.g., tracking, responding to, and resolving issues) into performance monitoring, categorize feedback, test the system's functionality, and refer feedback (when appropriate). (v) Also describe your standard operating procedure for closing the feedback loop. (vi) Explain whether your feedback mechanism feeds into a response-wide, collective accountability mechanism.

Reporting: Second and fourth quarter reporting must include explanations and examples of how beneficiary feedback has been used to continue or change programming decisions. Note that for the first time this year, USAID requires all NGO overseas assistance program proposals to include three standard indicators regardless of design or sector. One those indicators (#3) explicitly seeks to understand how program participants view the aid they receive by enquiring about the percentage of participants who report that humanitarian assistance is delivered in a safe, accessible, accountable, and participatory manner.

66 While the use by donors of AAP performance indicators should be considered as promising practice, the review also received feedback from partners about the challenges they had experienced with measurement and reporting, which suggests a need for continued dialogue on the most effective use of this approach.

67 **AAP incentivized through payment by result (PBR)s:** Only one donor that participated in the review, FCDO, incentivized AAP through their funding directly; as part of its core funding to UN and Red

⁴⁸ The eSingle form is the electronic proposal template which is used for funding applications to DG ECHO. See <https://www.dgecho-partners-helpdesk.eu/mssa/action-proposal/fill-in-the-single-form>.

⁴⁹ https://www.dgecho-partners-helpdesk.eu/reference-documents-ngo_dg_echo_protection_mainstreaming_indicator_-_technical_guidance.pdf (europa.eu).

⁵⁰ [BHA Emergency Application Guidelines | Humanitarian Assistance | U.S. Agency for International Development \(usaid.gov\)](#).

Cross Agencies, FCDO has sought to link a proportion of its funding to the achievement of specific payment by results indicators associated with the delivery of reformed humanitarian practices. Figure 13 provides an overview of the approach and a review by the Independent Commission for Aid Impact (ICAI) a year into its implementation.

Figure 13: Promising practice – FCDO (formerly DFID)

DFID’s approach to PBR: £684 million was provided by the Department for International Development (DFID, now FCDO) for ‘humanitarian reform of the UN through core funding’ to the seven key humanitarian agencies which underpin the international response system. These agencies provide funding, policy, coordination and response in humanitarian crises, both directly and through partners. The aim of the business case is to strengthen humanitarian response and encourage greater coherence and collaboration to commitments made at the 2016 WHS, in particular the GB; and address priorities identified in the UK’s Multilateral Development Review.⁵¹

Independent review of PBR: A review undertaken by ICAI in 2018 considered that it was too early to make a judgement on the effectiveness of the approach in driving change across UN agencies, although the challenge of additional reporting was raised, in addition to a risk that it had potential to undermine the inherent benefits of core funding.⁵²

4.4 Donor AAP funding practices

68 While a detailed analysis of collective AAP funding practices is beyond the scope of this exercise, it will be an important part of the jigsaw for the IASC TF when determining how to engage donors on collective AAP. With this in mind, the review has drawn heavily from Humanitarian Policy Group (HPG)/Overseas Development Institute (ODI) AAP funding analysis,⁵³ supplementing it with additional evidence where this was available, either from interviews or documentation.

4.4.1 Which donors fund collective AAP and how do they fund it?

69 Funding modalities used to support AAP in each response were categorised as follows:

- Bilateral funding (funding directly from donor to implementing agency).
- Bilateral grant intermediary funding (donor funding sub-granted through an intermediary actor, generally UN or INGO).
- Global pooled funds (funding disbursed by mechanisms paid into by multiple donors at global level, including CERF as well as non- UN funding vehicles such as H2H and the Start Network).
- CBPFs (funding disbursed by OCHA-managed pooled funds paid into by multiple donors at the country level).

70 Overall, the study analysed 20 contexts in which collective approaches to collective AAP were reportedly used.⁵⁴ A funding summary based on the categories outlined above is provided in figure 14.

Figure 14: ODI/HPG funding analysis for country and response-level collective AAP⁵⁵

⁵¹ https://iati.fcdo.gov.uk/iati_documents/90000109.pdf.

⁵² Independent Commission for Aid Impact (2018) *The UK’s Approach to Funding the UN Humanitarian System: A Performance Review*, December 2018.

⁵³ Lough, O. and Spencer, A. (2020) *Funding Collective approaches to communication and community engagement in humanitarian action*, HPG/ODI October 2022.

⁵⁴ The 20 contexts comprised the following: Afghanistan, Bangladesh (nationwide), Bangladesh (Rohingya response), Central African Republic, Democratic Republic of Congo (Ebola), Democratic Republic of Congo (Kasai crisis), Dominica, Fiji, India, Indonesia, Iraq, Kenya, Mozambique, Nepal, Papua New Guinea, Philippines, Somalia, South Sudan, Vanuatu and Yemen.

⁵⁵ Lough, O. and Spencer, A. (2020) *Funding Collective approaches to communication and community engagement in humanitarian action*, HPG/ODI October 2022.

Of these, it found that **direct grants** were used in 13 contexts, with funding for project implementation flowing directly from donor governments to UN agencies in 11 cases and to INGOs in five.

Bilateral grant intermediaries were also used in 13 contexts. UN agencies served as intermediaries in nine contexts and international NGOs in seven. UN agencies have generally served in a leading intermediary role during crisis settings, while international NGOs have done so largely in Communicating with Disaster-Affected Communities, CDAC-supported preparedness programming.

By contrast, global and country-based pool funds were comparatively under-used. **Global pooled funding** mechanisms were used in five contexts: Mozambique, Papua New Guinea, the DRC Kasai crisis in the case of CERF, and the DRC Ebola crisis, Dominica, and Mozambique again in the case of the H2H Network.⁵⁶

CBPFs were also only employed in five contexts: Afghanistan, the Central African Republic (CAR), the DRC Kasai conflict, Iraq and Yemen. Out of all approaches, only the Nepal Common Feedback Project was able to secure multi-year funding in a disaster or post-disaster setting. By contrast, CDAC-supported preparedness programming was funded across multiple years across five different settings.

71 Based on the analysis of funding modalities, the HPG/ODI research assessed the strengths and weaknesses of each, in addition to exploring the intersections within the funding landscape. Highlights from this analysis are summarized in the table below (figure 15).

Figure 15: An assessment of the strengths and weaknesses of collective AAP funding modalities⁵⁷

Modality	Key attributes, strengths and weaknesses
Bilateral funding	Description: Rarely forms the core of a collective approach, but most commonly supports common services at scale for collective AAP (e.g., DFID’s bilateral funding to WFP for an inter-agency call centre in Mozambique).
	Strengths: Often used to fund specific services at a scale that other donors cannot achieve. Commonly used as a lever to engage other donors including private foundations
	Weaknesses: Focus of accountability tends to be between donor and funded partner, rather than collective AAP. It may not galvanise collective support if it is not endorsed by HCT, included in the HRP or integrated into a broader collective AAP platform. Tends to be a relatively small number of bilateral donors that fund collective AAP.
Bilateral grant intermediary funding	Description: reduced risks and transaction costs have often resulted in donors supporting collective approaches by funding multi-actor consortia through an intermediary lead agency. In acute crisis settings, these consortia have overwhelmingly been led by UN agencies, which have also served as the focal point for coordinating the collective approach.
	Strengths: Having a single agency in charge of both coordination and funding can strengthen coherence within collectives ensuring that gaps are filled and that different partners fulfil complementary roles; a lead UN agency can be beneficial for mobilising more buy-in for a collective approach from humanitarian coordination systems and government authorities; UN agencies are often better placed to fundraise as they can usually mobilise more funding from a wider variety of sources relative to other actors as they present an attractive option for donors looking to minimise risk.
	Weaknesses: Having a single agency lead does present risks to the neutrality and independence of the collective approach, particularly if the lead agency also has an operational mandate and programme (e.g., Mozambique). Concerns have been raised about a failure to ensure independence from lead agency AAP and the collective AAP (e.g., CAR). It can also exacerbate pre-existing inter-agency tensions (e.g., Bangladesh). Potential to address this through passing

⁵⁶ The H2H Network brings together high-quality, independent humanitarian service providers. Members’ specializations fall into four categories: Data and information management; community engagement and accountability; security, logistics and programme support; and quality and sector professionalization. All bring cross-cutting technical expertise in service of the broader humanitarian sector. The H2H Fund is a means of financing humanitarian action, which aims to disburse funds quickly and kick-start recovery. It is available to network members. When the network funds a package of services for a humanitarian response, they are open source and available to all.

⁵⁷ Lough, O. and Spencer, A. (2020) *Funding Collective approaches to communication and community engagement in humanitarian action*, HPG/ODI October 2022.

	<p>money through non-operational UN entities such as the Resident Coordinator’s Office (e.g., Nepal) or UNOPS (e.g., Iraq and Afghanistan call centres). Often considered by NGOs as being too top-down and hierarchical and places too much power in the hands of a single agency.</p>
Global pooled funds	<p>Description: Two global pooled funding mechanisms were available to fund collective AAP and were reviewed during the HPG/ODI research; the UN CERF and the H2H Network.</p> <p>Strengths: Were considered to be effective in deploying funds and resources in a timely way (within weeks rather than months); the focus of the funds on different members of the system can offer complementarities (see below). The focus of H2H on common services offers a predictable menu of services for collective AAP from competent service providers (coordination, perceptions surveys, language support information services). As a consequence, it can also enhance integration of complimentary services.</p> <p>Weaknesses: Both funds can only provide support for relatively short time periods (CERF for 6-months and H2H for three months). The funds also have limitations on the agencies they can support (CERF is restricted to the UN and H2H targets NGOs that provide common services). This can promote complementarity (e.g., Mozambique), but this requires that allocations are made at the same time in the same country, which is rare. Because of the nature of CERF, it may be difficult for it to prioritise collective AAP because it competes with many other UN agency priorities. Collective AAP may fall outside of CERF’s Lifesaving Criteria. Neither of the funds are open to local actors as direct recipients.</p>
CBPFs	<p>Description: CBPFs were highlighted by a large number of respondents as being especially well-suited to supporting collective approaches. They have potential to support burden-sharing in similar ways to global pooled funding mechanisms.</p> <p>Strengths: the close alignment of CBPFs with the humanitarian programme cycle means that any activities they support are more likely to secure buy-in and to be well-integrated into humanitarian responses. CBPFs aim to support priorities targeted within HRPs, and funding allocations are the result of decisions by country-level review committees that encompass a wide variety of actors ranging from donors to local NGOs. Collective approaches funded through CBPFs were thus seen as more likely to be contextually grounded, collaborative design processes, relative to other funding modalities. CBPFs are able to fund non-UN agencies, including local actors directly.</p> <p>Weaknesses: Supporting collectives through CBPFs comes with its own set of challenges; As with CERF, CBPF support for collective approaches depends on a pre-existing understanding and commitment on the part of senior response leadership regarding the value of collective approaches. Moreover, while decision-making processes for fund allocation are theoretically inclusive, they can in practice be subject to the influence and interests of larger agencies, limiting their impact as a bottom-up design tool. The funding timeline of CBPFs is also relatively short, with projects often running for only six to nine months and hardly ever multi-year. This again limits their value as a predictable mechanism to support more strategic, medium-term development of approaches.</p>

5. Factors that affect donors' engagement in collective AAP

This section seeks to offer key messages to the IASC from donors discussions undertaken during the review, in addition to posing some of the dilemmas that must be addressed or navigated in order to strengthen donor engagement and action in support of AAP.

5.1 Reflections on donor engagement on AAP and the role of the IASC in galvanising action

- 72 Based on the interviews undertaken as part of the review, a number of observations can be made about donor engagement in and understanding of AAP. These are presented as a series of statements which will be important for the IASC to consider as part of its future engagement with donors on AAP. It is important to acknowledge that donors are not a uniform group and their understanding of AAP differs significantly.
- 73 Donors are receptive to guidance from the IASC: There is broad consensus about the challenges faced in operationalizing AAP commitments, but there is a perception that the humanitarian system has not been sufficiently clear about the problems and how to solve them. Donors are also looking for a clear set of messages from the IASC AAP TF about how they can assist in strengthening collective AAP. These should be made in the context of offering honest reflections and a set of actions about how operational challenges will be addressed.
- 74 Some donors lack conceptual clarity about AAP structures: The links between individual agency AAP and collective AAP have not been well articulated in the guidance. While funding is spent by individual agencies, which should be accountable to the communities that they work with, collective AAP requires a degree of coherence or harmonization across these different accountability processes. Moreover, there is a degree of confusion about how the Emergency Relief Coordinator's Flagship initiative relates to collective accountability. This would benefit from clearer communication.
- 75 Donors will seek to find a workable balance between trusting their partners and using their funding to incentivize AAP: Donors have different approaches to achieving a balance between trusting their partners to do the right thing with the funding they receive (carrots) and using their funding/influence to incentivise good practice (sticks).
- 76 Donors are not homogenous and have different capacities: Each of the donor groups identified in the ToR are different (bilaterals, multilaterals, pooled funds, joint humanitarian appeals). There are important implications for the scope they have and the capacity they possess to use their funding and influence to promote AAP. Donor oversight capacity will play an important part in determining the balance between the use of carrots and sticks. There is greater scope for larger donors with a field presence to raise the bar on AAP requirements (existence of AAP plans, AAP indicators and reporting etc.).
- 77 Most donors have limited scope to take on additional oversight: Most donors have limited capacity to significantly change the way they work. Many have limited country presence and hence will have very limited (or no) ability to monitor adherence to additional AAP requirements.

5.2 Good donorship and the dilemmas posed by AAP

- 78 It is apparent from donor interviews that a request for donors to enhance their support for collective AAP has the potential to pose a number of dilemmas. These will need to be navigated if there is to be greater consensus on the role that donors can play in strengthening collective AAP.
- 79 The challenge of turning the humanitarian system on its head: For the humanitarian system to be accountable to those it seeks to assist, there is a fundamental need to up-end the current power dynamics. Despite efforts, this remains an aspiration. As part of this, local actors must play a much stronger leadership role in AAP but there is significant work to do for this to become a reality.
- 80 The risk of exacerbating pre-existing capacity gaps: As part of the GB commitments on localisation, there was an acknowledgement of the need to strengthen investment in the institutional capacities of local organisations.⁵⁸ Acknowledging this, there were concerns that greater donor AAP requirements for funded partners could pose the greatest problem for local actors as it risks raising the funding bar still higher.
- 81 The dilemma of earmarking: Earmarking is a means by which donors can exert a greater degree of control over the allocation of funds and get greater visibility for their contributions. Under the GB, donors committed to progressively reduce the earmarking of their humanitarian contributions.⁵⁹ If there was a request to ring-fence funding for collective AAP, it would be contrary to the GB commitment to reduce earmarking.
- 82 The dilemma of increasing reporting requirements: Donors and major recipients of core un-earmarked funding contributions mutually agreed to waive project-level reporting requirements and to accept a general annual narrative and financial report in the interests of efficiency. A requirement for additional AAP reporting goes against the principle of seeking to reduce reporting.
- 83 Collective action in a competitive system: There was recognition of a tension within the humanitarian system; that while it is meant to be a 'collective' system, its members 'compete' with each other for funding.⁶⁰ The reasons for the challenges that are being experienced in operationalizing AAP have not been well articulated, and while funding may be one of these, it is very likely that competition between IASC members may also be a significant factor.
- 84 Donor perceptions of double-dipping: Most bilateral donors have a small number of core partners – all of which are part of the collective humanitarian system - to which they provide considerable unearmarked funding. Agencies may then request additional funds for AAP. An argument made by several donors is that if collective AAP is considered a priority, there is an important question as to why large-funded partners (UN agencies or INGOs) choose not to prioritise funding it with the unearmarked funding that they receive from donors. If they do fund it from their own resources, it would be helpful to provide evidence of this.

⁵⁸ <https://gblocalisation.ifrc.org/>.

⁵⁹ <https://interagencystandingcommittee.org/reduce-the-earmarking-of-donor-contributions>.

⁶⁰ See also <https://www.thenewhumanitarian.org/film/un-s-humanitarian-chief-why-competition-between-aid-agencies-challenge>

- 85 The need to fill evidence gaps: Under the Participation Revolution, donors committed to '*funding flexibly to facilitate programme adaptation in response to community feedback*'.⁶¹ Interviews for this study revealed an evidential gap about the progress that has been made in this and the presence/absence of '*flexibility*' for programme adaptation; agencies typically felt that donors were not sufficiently flexible to allow for '*course corrections*' in response to community feedback, while donors raised concerns that flexibility was not always requested and that agencies tended to either self-censor, or were themselves too focused on programme delivery to make changes. There is a need to fill this gap in evidence in order to understand where the problem lies.
- 86 The importance of avoiding a tick box approach to AAP: While it may be possible for donors to strengthen AAP requirements of their funded partners, there is a significant risk that it will become a '*tick-box*' exercise as many donors lack capacity for meaningful monitoring of additional requirements. There is a need to strike a balance between using donors to incentivize agencies' engagement in collective AAP on the one hand, and in making AAP a box-ticking exercise on the other as this merely risks increasing bureaucracy at the expense of improving the performance of the sector.
- 87 Recognising the AAP '*niche*' of different donors: It is important to acknowledge the limitations that may exist for some donors' investment in AAP. For example, pooled funds can (and do) play an important role in strengthening collective AAP but cannot offer a solution since they are modest in their size and geographic distribution and cannot offer predictable funding (6-12 months funding cycles, needs-based). Joint Humanitarian Appeals can provide multi-year funding, but they have a very limited geographic footprint. It will be important to understand the contexts under which each donor can provide funds in order to target funding requests.
- 88 The need for intermediaries to practice what they preach: Many of the same challenges and dilemmas that institutional donors face are replicated through the partnership chain. With this in mind, it is essential that UN agencies and INGOs that fund local actors ask the same questions of themselves that are being posed to their donors.

⁶¹<https://interagencystandingcommittee.org/a-participation-revolution-include-people-receiving-aid-in-making-the-decisions-which-affect-their-lives>.

6. Conclusions: towards an AAP donor advocacy agenda

This section draws on the evidence and analysis contained in this report to clarify the success factors required for collective AAP and the role of donors in contributing to this.

89 There was broad consensus among interviewees that there is scope for the humanitarian system to strengthen its partnership with donors to work together to strengthen collective AAP. It is anticipated that this could make a significant contribution towards realizing the shared ambitions laid out in the GB Participation Revolution. At the same time, while practical implementation of collective AAP has fallen well behind aspirations, there is now in place a tangible model (see figure 16) which has benefitted from broad agreement and several years implementation. As this review has shown, significant learning and reflection has taken place and there is now a much clearer approach and greater commitment.

Figure 16: Collective AAP Framework⁶²

AAP outcomes	IASC members' responsibility
Outcome 1. Coordinated Needs Assessment	<u>Coordinated Needs assessment and analysis</u> reflects all ⁶³ affected community groups' own perception of information needs and communication preferences.
Outcome 2. Inclusive HRP	<u>Humanitarian Response Plan</u> is inclusive of all affected ⁶⁴ community group voices.
Outcome 4. Information, participation, complaints, redress	<u>Response implementation</u> is coordinated and driven by informed community participation and feedback systems and is <u>monitored and adjusted</u> as needed.
Outcome 5. Learning and evaluation	Independent and participatory <u>evaluation, verification and learning</u> from response operations, ensuring this informs future actions at all levels.

90 While the Framework outlines a set of actions that must be taken for affected people to play a central role in the assistance they receive, in isolation, these actions alone are insufficient. For success to be achieved, there is a need for an enabling environment which includes three cross-cutting issues. These are outlined in figure 17 below.

Figure 17: Enabling environment/cross-cutting issues

Enabler	IASC members' responsibility
1. Committed leadership	RC/HC and HCT plan, lead and oversee the delivery of a response that is inclusive of and responsive to affected people
2. Inclusive system	An inclusive system and architecture in which local actors are engaged, resourced and capacitated to play their role in leading and delivering collective AAP
3. Quality resourcing (Outcome 3)	Timely, predictable and flexible (quality) funding is available to implement all aspects of individual and collective AAP

91 It is now time to bring the different strands of these strategies, commitments and capacities together. This is predicated on the belief that members of the IASC working in concert with the donor community would stand the greatest chance of garnering the resources, the commitment and the consistency in operational delivery that's required to achieve the change that is needed.

⁶² Please note that for the purposes of this research, the human and financial resources outcome of the Collective AAP Framework (Outcome 3) has been deliberately moved over to the '*enabling environment/cross-cutting issues*' to reflect the fact that all of the activities in the Framework require adequate resources and to this end, it cuts across all of the other collective AAP outcomes.

⁶³ Inclusive of their gender, age, disability status and other diversities.

⁶⁴ Inclusive of their gender, age, disability status and other diversities.

6.1 The need for an evidence-informed advocacy agenda

- 92 The challenge of using the two frameworks outlined above in isolation is that they are simplified versions of reality and leave little scope to incorporate the challenges, dilemmas and lessons that both hinder and enhance progress and which were outlined earlier in this report. In the real-world, delivery of collective AAP has proved to be extremely complex and success has been modest, which underlines the need to fold in evidence from practice.
- 93 An important ingredient for eliciting donor engagement on AAP is to identify where there are gaps in information, knowledge or unresolved problems that the IASC Operational Policy and Advocacy Group, in coordination with the Principals might be able to draw specific attention to in order to start filling or unblocking them. It will be necessary also to acknowledge that in some cases, shifting donor attitudes or funding practices will require that IASC members make changes themselves – either as a quid pro quo, or as a means of *‘getting their own houses in order’*.
- 94 It is also important to acknowledge the different types of accountabilities that exist and understand the different role and scope that donors have to play in each of these. While the focus of this review has been on collective AAP, one of the findings is that from a donor perspective, the strongest accountability lies between donors and their funded partners; it is noteworthy that most donor requirements relate to agency accountability commitments, rather than collective ones. Moreover, without agency-level accountability commitments, it will not be possible to achieve collective accountability aspirations as the latter cannot exist without the former. Additionally, it should be acknowledged that collective accountability itself needs to be addressed at two different levels; the strategic level and the operational level. While the two levels are inextricably linked, donor engagement in each will focus on different issues.
- 95 Figure 18 below offers a simplified model of the different types and levels of accountability. The table beneath (figure 19) provides some initial thoughts on a) issues that require additional evidence and b) issues that could be incorporated into a donor engagement strategy on AAP.

Figure 18: Simplified diagram of accountabilities

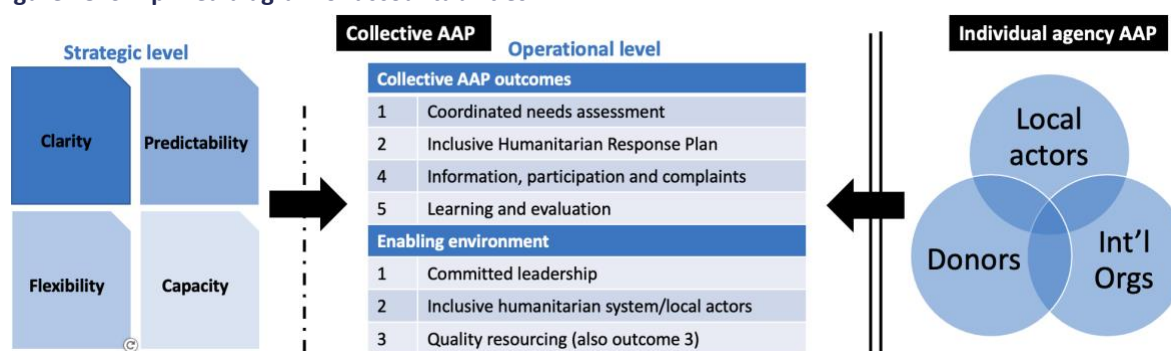


Figure 19: Potential actions and advocacy for the AAP TF

Key issue	Options for consideration by the AAP TF
Individual agency AAP	
Donor commitments	<p>There has been a failure, by some donors, to meet signed-on AAP commitments. This may be because AAP lacks prominence and incentives are insufficient to promote greater adherence.</p> <ul style="list-style-type: none"> Revise and update references to AAP in the GHD Principles to ensure consistency with the CHS Commitments, the Grand Bargain Participation Revolution and the IASC Collective Accountability Framework.

		<ul style="list-style-type: none"> Ensure AAP has greater prominence in the GHD Principles in line with the Commitments that have been made by donor signatories to the GB Request that reporting on progress against GB Participation Revolution commitments are separated from reporting on localisation to better identify specific progress that has been made.
Donor requirements		<p>Donor AAP requirements for their funded partners lack consistency and coherence.</p> <ul style="list-style-type: none"> Propose the adoption of the CHS as a core accountability framework and the IASC collective accountability framework for donor funding guidelines with a view to improving consistency across donors (aim to raise the collective bar). Lobby for a standard menu of donor AAP requirements that are suitable for a range of different donor capacities. Lobby donors to make CHS verification mandatory for grantees. Explore solutions to potential challenges that this may pose for local actors (consider a passporting approach or identify other low cost solutions).
Strategic-level collective AAP		
Clarity and predictability		<p>There is a lack of conceptual clarity among some donors about what collective AAP is, how it links to individual agency AAP and how they might fund it.</p> <ul style="list-style-type: none"> Prepare a short guidance note that shows the linkages between a) individual agency AAP, b) collective AAP, c) the ERC's Flagship Initiative in order to ensure sufficient clarity exists among donors. Engage with donors in order to gain a greater clarity on their intentions, capacities and modalities to provide support and funding for collective AAP. Use the findings to prepare funding guidance for RC/HCs and HCTs for use when fundraising for collective AAP
Flexibility		<p>There is a lack of clarity and evidence about the issue of donor flexibility. This should be addressed as a first step to ensuring that humanitarian agencies can more routinely adapt their programmes based on feedback received from affected people.</p> <ul style="list-style-type: none"> Fill the gap in evidence on the nature and cause of shortcomings in flexible funding through action research commissioned in a country case study; Analyse and disseminate the findings and use the evidence from the recommendation above as a lever to promote change either in a) the practices of operational agencies in requesting flexibility when community feedback requires course corrections to be made, and/or b) advocating for donors to meet their commitments on flexible funding
Capacity		<p>There continues to be specific gaps in capacity for global and country-level support to, and engagement in AAP. The gap of greatest concern is linked to local actors and the important role they should play in leading informing and engaging in collective AAP, There is also a lack of funding for technical support and surge capacity.</p> <ul style="list-style-type: none"> Given that both localisation and AAP are GB priorities, there is an important opportunity to start to systematically address gaps. To do this at a country-level will require a deeper understanding of the capacity and inclusion gaps that exist among local actors. It should be recognized that the solution will need to address issues of both power and funding. Develop a clear proposition for global surge for collective AAP and include it as part of global discussions about donor funding for collective AAP.
Operational-level collective AAP		
Collective outcomes and enabling environment	AAP and	<p>Significant progress has been made in articulating a Collective AAP Framework and implementing it in a range of contexts. External research has gone some way to distilling key lessons about implementation and funding needs and modalities.</p> <ul style="list-style-type: none"> At a country-level, RC/HCs and HCTs need to routinely play the leadership role bestowed on them in outlining costed proposals for submission to donors. Where donors have a country presence, they should support the development of Action Plans and use their influence to hold leaders to account for the implementation of such Plans. Acknowledging that different donors have different aspects of collective AAP that they are able to fund, it is important that at a country-level donors (bilateral, multilateral, pooled funds and intermediaries) coordinate their financial support for

collective AAP in such a way as to provide predictable funding for all the activities associated with it.

- The evidence suggests that local actors may lack funding, access and capacity to play their full role in collective AAP. Donors, particularly the CBPFs have an important role to play in identifying the barriers (funding, influence, human resources etc.) and using their funds, influence and support to overcome them.

96 It is important to note that the '*options for consideration*' that have been listed above constitute suggestions based on the findings of this review and may not reflect the views or priorities of the AAP TF. As a consequence, they should be discussed, validated and more clearly articulated by the TF members. The TF should also make additions to the list of options where perceived priorities have not been identified by the research. This will offer the greatest opportunity to build consensus within the group around a discrete set of actions and to strengthen ownership.

Annex 1: Terms of Reference

This annex outlines the Terms of Reference for the review.

Consultancy Purpose/Objectives:

- To produce a Meta Review of recommendations for donor's support to AAP
- Review of current donors' requirements for AAP
- Recommendations for the future work of the AAP Task Force on its work with donors

Background:

Greater accountability to people in crisis requires a system-wide approach. As humanitarians our primary responsibility is to people affected by crisis.⁶⁵ Our efforts to be accountable rest on principles, values and factors that enable the system to be more engaging and responsive to the needs of affected people. In recognition of this, the IASC Accountability Task Force has adopted the following theory of change to guide its work:

Contribute to greater system-wide change by strengthening collective AAP by:

- (1) having a more accountable and enhanced leadership
- (2) supported by a more inclusive system and architecture; and that
- (3) has access to more quality funding and technical resources.

The IASC Principals have called for the commitment of donors to put in place the required incentives for the system to be more engaging and responsive to the needs of affected people. The Task force recognises that donors⁶⁶ have a critical influence on the way organisations conduct their work. They have a powerful role in the drive for greater accountability to people in crisis, holding humanitarian actors to account, and incentivising course correction based on engagement with affected people and their feedback. Donors can identify gaps, address administrative challenges and provide more predictable, systematic and flexible support for collective accountability to affected people.

Therefore, the Task Force has developed a plan to engage with donors, working closely with the Grand Bargain Participation Revolution, to work closely with donors on the drive for greater AAP.

This review is the first stage of that process. It recognises that many recommendations have already been made in this regard, so will compile a synthesis of these to affirm the work already undertaken. This would also include a review of how donors are currently referencing commitments to AAP in their grant and partnership guidelines.

Deliverables

- Meta review of donor related recommendations – a number of published reports on the humanitarian system have referred to the role of donors in Accountability practices. This would consider these to produce a meta overview of the recommendations.
- Review of current donors' practices on AAP – many donors are promoting AAP in their funding guidelines and partnership documents, in a variety of ways and approaches. This review would produce an overview of how donors are taking account of AAP. This would include the DAC donors, UN partnership guidance and other funding like the joint disaster appeals and pooled funds.

⁶⁵ IASC, Statement by Principals of the Inter-Agency Standing Committee – Accountability to Affected People in Humanitarian Action, 14 April 2022.

⁶⁶ By donors – we recognise that all organisations that transfer funds to another organisation have a role to play in the drive for greater accountability. The work of the Task Force will focus on government donors, but also pooled fund mechanisms.

- Synthesis report and recommendations for the Task Force and IASC to take forward. The consultant/s will be expected to discuss a draft report with the IASC TF group/workstream before producing the final version of the report.

Timeline

The consultancy time period is for 20 days to the end of March 2023.

Annex 2: Summary of methods and approach

This annex provides a brief summary of the methods used, approach taken, and the evidence that informed the findings.

1.1.2 Approach

The research was undertaken in three phases; a short inception phase, a research and analysis phase, and a reporting and feedback phase. Each is briefly described below:

Inception phase

The inception phase prepared the groundwork for the assignment and ensured clarity about the tasks and the outputs. It included the collection of relevant literature to review and collation of contacts for key informant interviews. Emphasis was placed on engagement with the TF for purposes of introduction and briefing as a means of building consensus on how to proceed with the research and analysis phase.

Research and analysis phase

The research and analysis phase comprised two main tasks as outlined in the ToR:

- Meta review of donor related recommendations: Systematic review of published reports on the role of donors (bilateral and pooled funds) in accountability practices in humanitarian action. This would be organised by donor type and nature of the recommendation. The organisation of the review in this way will permit a ranking of recommendations by frequency, identification of the existence of specific trends by donor type and highlighting of innovative recommendations which have the greatest potential to promote positive practice change.
- Review of current donors' practices on AAP: Collation and analysis of references in donor literature, frameworks, agreements and partnership documents on AAP (both references to mandatory actions in addition to good practice). Synthesis of how donors are taking account of AAP.

Reporting phase

The reporting phase included the preparation of the draft and final synthesis report and recommendations for the TF and IASC to take forward based on evidence gathered from the two tasks outlined above. An initial draft report was produced for discussion with the IASC TF group which was finalized based on feedback received during the consultation and validation workshop.

1.1.3 Methods and evidence

The research was primarily undertaken using qualitative techniques. A summary of key methods that were used and the evidence that informed this report is provided below (see figure below).

Figure: Summary of methods used and evidence assessed.

Method	Description	#
Document review	A review of relevant literature was undertaken during the inception and research and analysis phases. This included relevant reviews, evaluations and research reports, Reference documents on collective accountability policies and practices, Donor partnership frameworks, agreements and AAP requirements.	
Documents reviewed	<ul style="list-style-type: none">▪ IASC Task Force and agency staff▪ Bilateral donor staff▪ Multilateral donor staff▪ Pooled Fund staff▪ Joint Humanitarian Appeal staff	21 10 12 5 2

Key informant interviews	A core set of questions were developed for key informant interviews. Informants were then selected from the IASC TF membership, donor agencies and AAP advisory and implementation staff.	
Interviews conducted	<ul style="list-style-type: none"> ▪ Reviews, evaluations and reports (from which 27 included donor AAP recs.) ▪ Operational AAP reference documents (IASC, guidance documents etc.) ▪ AAP commitments (Grand Bargain, IASC etc.) ▪ Donor AAP reference documents, partnership frameworks and requirements 	<p>87</p> <p>30</p> <p>22</p> <p>67</p>
Case study analysis	While case study analysis was not a prerequisite of the review, the literature review was expanded to include recent experience in implementing collective AAP in a range of countries. This was complemented by a number of the interviews.	
Countries reviewed	<ul style="list-style-type: none"> ▪ Afghanistan, CAR, Ethiopia, Indonesia, Lebanon, Syria, Yemen, Regional 	20

Annex 3: Evaluations containing AAP recommendations

This annex provides a list of documents that were consulted during the meta-review of evaluations.

Figure: Criteria for the review of evaluations

- All inter-Agency Humanitarian Evaluations from 2018 - date
- All CERF reviews from 2018 - date
- All CBPF evaluations from 2018 - date
- Reports on collective accountability - Google search
- Reports on AAP - Google search
- Humanitarian Accountability Reports from 2020 - date
- START Fund evaluations from 2018 - date
- Search of reports from Ground Truth Solutions, HPG/ODI, ALNAP, CDAC from 2018 - date
- Review of ALNAPs Evaluative Report Database – AAP search term

Global evaluations, research and reports

ADE (2022) *Evaluation of the Belgian Strategy for Humanitarian Aid: How does Belgium meet the needs of people affected by humanitarian crises?* September 2022.

Betz, M. and Eveleigh, M. (2022) *The impact of COVID-19 on communication, community engagement and accountability: Perspectives from stakeholders, communicators and audiences*, June 2022.

Communication and Community Engagement Initiative (2018) *From Words to Action: Communication and Community Engagement in Humanitarian Action*, May 2018

Core Humanitarian Standard, *Humanitarian Accountability Report 2022*, September 2022.

Core Humanitarian Standard, *Humanitarian Accountability Report 2020*, August 2020.

Ground Truth Solutions and OCHA (2022) *Listening is not enough: Transformative change in humanitarian assistance, global analysis report*, November 2022.

Holloway, K. and Lough, H. (2020) *Implementing Collective Accountability to Affected Populations. Ways forward in large-scale humanitarian crises*, HPG/ODI, October 2020.

Leslie, D. et al (2022) *Accountability to affected people: Assessing NGO engagement with the collective AAP framework*, LSE Department of International Development, March 2022.

Lough, O. and Spencer, A. (2020) *Funding Collective approaches to communication and community engagement in humanitarian action*, HPG/ODI October 2022.

Metcalfe-Hough, V. et al (2022) *The Grand Bargain in 2021. An Independent Review*, June 2022.

Obrecht, A., Swithern, S. and Doherty, J. (2022) *The State of the Humanitarian System, 2022 Edition*, September 2022.

Peer2Peer Support (2021) *Collective Accountability to Affected People Workshop with Resident/humanitarian coordinators, Final Report*, June 2021.

REACH (2022) *THREE KEY WAYS GLOBAL DECISION-MAKERS CAN SUPPORT HUMANITARIAN WORKERS IN DELIVERING ON AAP*, August 2022

Steets, J. et al. (2016) *Drivers and Inhibitors of Change in the Humanitarian System*, Global Public Policy Institute, April 2016.

Tanner, L. et al (2018) *Strengthening Information Sharing and Two-way communication preparedness capacity for better dialogue, better information and better action. A CDAC network project of the DFID-funded Disasters and Emergencies Preparedness Programme*, hosted by World Vision

Country evaluations, research and reports

Africa's Voices, Ground Truth Solutions and REACH (2019) *Amplifying community voices in humanitarian action in Somalia*, 2019

Betz, M. (2021) *Haiti six months on: good intentions, bad memories, and local frustrations*, February 2022

CDAC Network (2022) *Assessment of communication, community engagement and accountability in Sudan*.

CDAC Network (2018) *Assessment of surge capacity for communication and community engagement*, February 2018.

Dewulf, A. et al. (2020) *Collective approaches to risk communication and community engagement in the Ebola response in North Kivu, Democratic Republic of Congo*, HPG/ODI, October 2020.

Lough, O., Nassivila, A. A., and Grey Meral, A. (2020) *Collective Approaches to communication and community engagement in the Mozambique Cyclone Idai response*, HPG/ODI, October 2020.

Rooted Impact (2021) *Real Time Response Review: Afghanistan Crisis Appeal Phase 1*, June 2022

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Annex 4: List of key informants

This annex lists the evaluation participants at global, regional and country-level. It should be noted that some members of the Task Force may also act as donors to partner organisations.

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