

Appendix C:

Feedback Collation Support Documents

Introduction

This appendix contains the quantitative data from the June-July feedback, the quantitative data from the August-October feedback, and the collated comments from August-October feedback round.

June-July Feedback: Quantitative Data

This section of Appendix C contains the numerical findings from the June-July feedback round. This data is from the objective evaluation section of the feedback form disseminated to the Standards Development Reference Group in mid June 2006 requesting comments on version 2 of the HAP Standard. These findings contributed to the development of version 3 of the HAP Standard in late July 2006.

	Strongly disagree	Disagree	Agree	Strongly Agree
The standards selected are all relevant to accountability.		2	6	6
The standards are coherent and easily understood.		4	11	
The standards will help the sector differentiate between good and bad practice.		2	8	6
There are no standards missing that should be included.		5	7	3
The indicators selected are all relevant to the standards.		2	11	
The indicators are all measurable.	2	2	9	
It is feasible to comply with the indicators.		2	11	
Complying with the indicators is affordable in terms of time, money, and resources.		4	7	
The indicators will definitely add value to the accountability process.		3	5	5

August-October Feedback: Quantitative Data

This section of Appendix C contains the numerical findings from the August-October feedback round. This data is from the objective evaluation section of the feedback form disseminated to the Standards Development Reference Group in late August 2006 requesting comments on version 3 of the HAP Standard. These findings contributed to the development of versions 4 and 5 of the HAP Standard in November 2006.

Question/ Respondent	Total Responses	Percentages		
Introductory Text				
The forward is clear and comprehensive				
Strongly Disagree	28	0%		
Disagree	28	14%		
Agree	28	57%		
Strongly Agree	28	29%		
The covenant is coherent and easily understood				
Strongly Disagree	28	0%		
Disagree	28	11%		
Agree	28	64%		
Strongly Agree	28	25%		
Standard One				
Is the standard clear and understandable?				
Strongly Disagree	28	0%		
Disagree	28	14%		
Agree	28	54%		
Strongly Agree	28	32%		
Is it feasible to comply with this standard?				
Strongly Disagree	26	0%		
Disagree	26	0%		
Agree	26	50%		
Strongly Agree	26	50%		
Complying with this standard's requirements is affordable in terms of time, money, and resources				
Strongly Disagree	24	0%		
Disagree	24	13%		
Agree	24	50%		
Strongly Agree	24	38%		
The requirements will definitely add value to the accountability process				
Strongly Disagree	25	0%		
Disagree	25	8%		
Agree	25	28%		
Strongly Agree	25	64%		
Standard Two				
Is the standard clear and understandable?				
Strongly Disagree	29	3%		
Disagree	29	7%		
Agree	29	31%		
Strongly Agree	29	59%		
Is it feasible to comply with this standard?				
Strongly Disagree	28	0%		
Disagree	28	7%		
Agree	28	43%		
Strongly Agree	28	50%		
Complying with this standard's requirements is affordable in terms of time, money, and resources				
Strongly Disagree	27	0%		
Disagree	27	15%		
Agree	27	56%		
Strongly Agree	27	30%		
The requirements will definitely add value to the accountability process				
Strongly Disagree	27	0%		
Disagree	27	7%		
Agree	27	33%		
Strongly Agree	27	59%		
Standard Three				
Is the standard clear and understandable?				
Strongly Disagree	28	0%		
Disagree	28	7%		
Agree	28	43%		
Strongly Agree	28	50%		
Is it feasible to comply with this standard?				
Strongly Disagree	25	0%		
Disagree	25	12%		
Agree	25	44%		
Strongly Agree	25	44%		

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Question/ Respondent	Total Responses	Percentages		
Complying with this standard's requirements is affordable in terms of time, money, and resources				
Strongly Disagree	25	4%	Requirements are Affordable n=25 	Add Value to Accountability n=28
Disagree	25	16%		
Agree	25	52%		
Strongly Agree	25	28%		
The requirements will definitely add value to the accountability process				
Strongly Disagree	28	0%	Clear & Understandable Standard n=27 	Requirements are Feasible n=27
Disagree	28	4%		
Agree	28	29%		
Strongly Agree	28	68%		
Standard Four				
Complying with this standard's requirements is affordable in terms of time, money, and resources				
Strongly Disagree	25	0%	Requirements are Affordable n=25 	Add Value to Accountability n=28
Disagree	25	16%		
Agree	25	60%		
Strongly Agree	25	24%		
The requirements will definitely add value to the accountability process				
Strongly Disagree	28	4%		
Disagree	28	11%		
Agree	28	43%		
Strongly Agree	28	43%		

Question/ Respondent	Total Responses	Percentages		
Standard Five				
Is the standard clear and understandable?				
Strongly Disagree	27	4%	Clear & Understandable Standard n=27 	Requirements are Feasible n=27
Disagree	27	7%		
Agree	27	19%		
Strongly Agree	27	70%		
Is it feasible to comply with this standard?				
Strongly Disagree	27	0%		
Disagree	27	15%		
Agree	27	19%		
Strongly Agree	27	67%		
Complying with this standard's requirements is affordable in terms of time, money, and resources				
Strongly Disagree	26	0%	Requirements are Affordable n=26 	Add Value to Accountability n=27
Disagree	26	12%		
Agree	26	38%		
Strongly Agree	26	50%		
The requirements will definitely add value to the accountability process				
Strongly Disagree	27	7%		
Disagree	27	4%		
Agree	27	37%		
Strongly Agree	27	52%		
Standard Six				
Is the standard clear and understandable?				
Strongly Disagree	27	0%	Clear & Understandable Standard n=27 	Requirements are Feasible n=25
Disagree	27	15%		
Agree	27	33%		
Strongly Agree	27	52%		
Is it feasible to comply with this standard?				
Strongly Disagree	25	0%		
Disagree	25	12%		
Agree	25	60%		
Strongly Agree	25	28%		

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Question/ Respondent	Total Responses	Percentages		
Complying with this standard's requirements is affordable in terms of time, money, and resources				
Strongly Disagree	24	4%		
Disagree	24	13%		
Agree	24	63%		
Strongly Agree	24	21%		
The requirements will definitely add value to the accountability process				
Strongly Disagree	26	0%		
Disagree	26	8%		
Agree	26	38%		
Strongly Agree	26	54%		
Standard Seven				
Is the standard clear and understandable?				
Strongly Disagree	27	4%		
Disagree	27	7%		
Agree	27	44%		
Strongly Agree	27	44%		
Is it feasible to comply with this standard?				
Strongly Disagree	26	0%		
Disagree	26	4%		
Agree	26	50%		
Strongly Agree	26	46%		
Complying with this standard's requirements is affordable in terms of time, money, and resources				
Strongly Disagree	26	0%		
Disagree	26	8%		
Agree	26	54%		
Strongly Agree	26	38%		
The requirements will definitely add value to the accountability process				
Strongly Disagree	27	0%		
Disagree	27	0%		
Agree	27	41%		
Strongly Agree	27	59%		

August-October Feedback Comment Collation

This section of Appendix C contains the comments collected from respondents to the August-October Feedback round. These comments have not been edited. I copied the comments directly from the incoming feedback forms into the forma below. Ease of use was the primary objective of this formatting style. The only ‘data processing’ processes which these comments have undergone are: 1) the respondents’ names have been removed, and 2) the comments have been split up and placed in the appropriate sections (i.e. comments regarding the forward were placed under the forward section below).

The comments are organized below using the following format:

A. Introductory Text

- Forward & Covenant

B. Benchmark Specific Comments

- Benchmark 1
- Benchmark 2
- Benchmark 3

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- Benchmark 4
- Benchmark 5
- Benchmark 6
- Benchmark 7

C. General Commentary

- (the general comments are those which did not fit under the other headings)

The HAP ESC Management Team used the comments collated below to: 1) edit and rewrite the forward and the covenant, and 2) perform a preliminary redraft of the HAP Standard from version 3 to version 4 (November 2) in time for the HAP Board meeting. Version 4 has since been modified to take into account the detailed results of the full field assessment phase.

A. Introductory Text

FORWARD & COVENANT	
R1	No Comments
R2	No Comments
R3	No Comments
R4	<p>Would all this be comprehensible to beneficiaries and others affected by a disaster who would want to know what all the accountability business is about? I fear not, but that may be a challenge too far!</p> <ul style="list-style-type: none"> ▪ Have you thought about the idea of ‘fit for purpose’ to go with the definition of quality in para. 2 of the Foreword? It would seem to me to be a useful addition. ▪ Let it read “the right of all persons to receive and give assistance ...” in principle 1 in 1.3. ▪ I would like to suggest that you reverse the sequence of principles 3 and 4 in 1.3. ▪ Reverse the order of Benchmarks 2 and 3 in 1.4, to be consistent with the order of principles 3 and 5 in 1.3.
R5	No Comments
R6	<ul style="list-style-type: none"> ▪ I think the first sentence should better reflect the works agencies are involved in which extends beyond saving lives and reducing suffering. Suggest something like, “...their mission to provide protection, save lives, reduce suffering and improve the health and well being of displaced populations.” ▪ 1.3 Hierarchy of humanitarian principles #2 Impartiality: suggest adding gender and age ▪ 1.5 Suggest substituting interests with activities
R7	<ul style="list-style-type: none"> ▪ Foreword para 5 last sentence. Editorial nitpicking, but "none" takes the singular so to be grammatically correct, this should read "none of which was completely suitable in its current form"; ▪ Intro last sentence. I still have a problem with the hierarchy / higher or lower levels of principles. Neutrality is number six. Surely this is non-derogable, not something that can be abandoned "as a necessary condition for complying with a [one of the five?] higher level principle"? Neutrality as formulated in 1.3.6 is a requirement for an action to be humanitarian;
R8	<ul style="list-style-type: none"> ▪ In the foreword, please elaborate on how will the agencies be held to account against the values of the Covenant. ▪ The following sentence needs further explanation. “none of which were suitable

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	<p>in their current form for immediate application in the HAP monitoring, complaints handling and quality assurance systems”. Seems like a ‘fast one’ is being pulled over our eyes. To be clear, I DISAGREE WITH THIS, AND DISAGREE WITH THE ‘VALUES’ YOU HAVE CHOSEN. Seems rather arbitrary.</p> <ul style="list-style-type: none"> ▪ Impartiality also includes the idea of proportionality to need. ▪ You have missed independence which is an enabling factor for impartiality to be applied ▪ ‘developmental relief’ has been removed from the principles that both Sphere and the Code of Conduct include. What will you do about multi-mandate agencies. Are these values only applicable in conflict? ▪ I’m unclear about the purpose of the ‘performance benchmarks’. It seems to duplicate the standards and makes things cumbersome. Benchmark 4: capacity building of whom to do what?
R9	No Comments
R10	<ul style="list-style-type: none"> ▪ The language of both the forward and the Introduction to the Covenant could be simplified. The language is quite convoluted making it difficult to grasp even for a native English speaker. Careful simplification of the language would make it much easier for staff and others that have English as a second language to understand and also to translate into local dialects/languages, which is crucial to ensure understanding & commitment. ▪ Also, the accountability principles could/should be incorporated or associated with the covenant rather than added at the end of the Standards. It is not clear how the accountability principles and humanitarian principles relate or complement each other in relation to building the fundamental core or ‘values centre’ that the Covenant forms.
R11	No Comments
R12	Forward: please make it more simple and easy to understand. Use simple and easy word. Some sentences are too long (e.g. 2 nd line of 2 nd para).
R13	No Comments
R14	No Comments
R15	<ul style="list-style-type: none"> ▪ Principles - I’m sure this has been debated long and hard but I was surprised not to see independence in the hierarchy of principles. ▪ Performance benchmarks – the list of things to pay due attention to feels a bit randomly put together with the one about supply chain transparency and efficiency sitting particularly oddly in the list. ▪ Declaration of additional interests and values – I think this bit needs a bit more explanation in the opening paragraph. Perhaps something along the lines of – beneficiaries should have a right to know about the affiliations, interests and values of the organisations that are trying to help them. Are they tied to a donor government or do they have particular evangelical aims? It also needs to state who the organisations will declare additional interests or values too. In the list I was looking for something about links to donor governments – given that you don’t have independence in the principles – this might be particularly important. It’s sort of covered under political affiliation but I think it might need its own and more explicit bullet. ▪ Qualifying norms – this is a bit nit-picky but some organisations no longer really have headquarters such as World Vision. Should the norm instead be; ‘formally registered and recognised in all the countries in which they seek to provide humanitarian assistance’? ▪ I wondered about the non-profit criterion. This would mean for instance that CHASE-Ops couldn’t be certified under HAP. Is this a problem or a deliberate exclusion? ▪ And I’m not sure about the term ‘core mandate’ – arguably restricting it to MSF and ICRC. Also the term independent appears here having not appeared in the principles. So would this exclude for instance the implementing arm of donor governments such as SDC’s humanitarian unit? If so, why not have independence in the principles?
R16	No Comments
R17	No Comments

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R18	No Comments
R19	No Comments
R20	No Comments
R21	No Comments
R22	A more streamlined set of principles may be more useful.
R23	The performance benchmarks should be different for agencies working with partners, in the sense that those agencies should commit themselves for some of the standards but also (and mainly) encourage partners to achieve them. In case of partners, performance should be measured as the process towards meeting those standards as it will not be immediate.
R24	<ul style="list-style-type: none"> ▪ Why not “must” and “may?” The distinction seems a little clearer. ▪ Does it mean that below principles are ranked in order of importance? ▪ Consent for what?
R25	No Comments
R26	<ul style="list-style-type: none"> ▪ Both the forward and the covenant would benefit for being edited for Plain English, to make sure that they are as clear and easy to understand as possible. ▪ I would suggest removing entirely the current sections 1.4 (performance benchmarks) and 1.5 (declaration of additional interests and values). I think they provide a much less important level of information than the rest of the covenant, and so are out of place here (the matters they cover are substantially covered by the standards themselves). This would also have the advantage of making the whole thing shorter and easier to understand and digest. ▪ Under point 3 of paragraph 1.3, I would suggest replacing the word “proxies” with “representatives”, so as to be consistent with the standards.
R27	Personally I would like to have a more straight forward covenant focusing specifically on the organisational requirement and commitment necessary to obtain the HAP standard and eventually certification. It's there, but it could be improved a little.
R28	No Comments
R29	No Comments
R30	<ul style="list-style-type: none"> ▪ A plea for plainer English, please, particularly in the Covenant. Also shorter sentences. ▪ Examples, somewhere, on what is meant by ‘abandoned a lower-level HP as a necessary condition for complying with a higher-level principle ...’ would be very useful. ▪ I am intrigued by the 1.3 the hierarchy of humanitarian principles. Maybe my ignorance, but who ranked these? Surely, although an interesting exercise, this is opening up a can of worms? It must be almost impossible to limit/suspend debate on these rankings depending on the culture or belief system that one comes from ...
R31	No Comments
R32 (Processing Note: Track Changes upon request)	<p>Foreword:</p> <ul style="list-style-type: none"> ▪ Para 2: has long overcomplicated sentences. Possible improvements are suggested in the attached version of the draft with track changes. ▪ Foreword: Para 4: the term ‘benchmarks’ is introduced without being explained. How is this different from a standard/s? (see below section 9, suggestions for a glossary, for all comments on terms). <ul style="list-style-type: none"> ○ ‘An explicit framework of shared values’ – it becomes evident in the next para that this is a reference to the Covenant, however this needs to be made more explicit. The link between the Accountability Principles and the Covenant, and then the link with the standard, is not clear in paras 5 and 6. The standard is said to operationalise the principles – so where do the values fit in? The gist is there but it needs to be stated more simply and clearly. ▪ What is a covenant? ▪ Para 6, last sentence: shall and should. In fact only ‘shall’ is used for all the current standards, except in standard 4.2 which has a different format (that should be revised to be consistent with the rest). Suggest this sentence is taken out for simplicity. ▪ Generally, the different between a ‘standard’ and ‘standards’ is still not clear. As

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	<p>noted in previous comments:</p> <ul style="list-style-type: none"> ○ ‘There is confusion in the use of the term 'Standard' as now used in the title (instead of manual in previous versions I think - although 'manual introduction' is the first title in the contents) and the 'standards'. It is implied that the 'Standard' is the overall document, which comprises in part individual standards with their indicators. However this is not explained; keeping the term Manual would probably be clearer’. <p>Covenant:</p> <ul style="list-style-type: none"> ▪ First para much clearer than before. Have suggested a few para breaks, if space allows, to make reading easier. ▪ 1.3 The ‘hierarchy’ of principles is not explained – presumably the list is supposed to be descending in order of importance, but this should be explicit. Shouldn’t 6. Neutrality, follow 2. impartiality? ▪ As noted in the previous comments, the reference to ‘recognised minimum standards’ could have a footnote referring to Sphere and any others that are meant. ▪ Note that Sphere is also relevant to section 1.5 ‘additional interests or values’ noted in section 1.6 of the current version of the standards. The Sphere notes ESC 200406 meeting notes highlight some of these.
R33	<p>Just a quick note to say that we have one more piece of feedback for you - on the actual Covenant - part 1.4 where we would like to see added discrimination - particularly in relation to age recognising that in humanitarian crises 50% of beneficiaries are children - and therefore while we recognise that not all agencies see children as we do - they are key beneficiaries and therefore need to be recognised as such within each of the standards and therefore all agencies need to be taking into account and therefore "paying due attention" to the needs of children . Leaving age as an additional interest in 1.5 leaves agencies an opt out clause we are not happy with.</p>
R34	No Comments
R35	It is possible to use more references into the text, in order to make the need connections between the affirmations into the covenant and the other efforts.
R36	<p>The Foreword:</p> <ul style="list-style-type: none"> ▪ The Foreword states that the term ‘shall’ is used where a benchmark is a requirement, and the term ‘should’ is used where the benchmark is recommended. There does not appear to be any use of the word ‘shall’ in relation to the benchmarks, making that statement superfluous. <p>The Covenant:</p> <ul style="list-style-type: none"> ▪ Personally I find it difficult to accept that the principles can be placed in a hierarchy, and therefore also question that an organisation can ‘abandon’ a lower level humanitarian principle as a necessary condition for complying with a higher-level principle. It might be argued that standards may be lowered, but I think it is difficult to abandon principles. (1.1 and 1.2) ▪ That being said, if the principles were to be arranged in a hierarchy, then providers of humanitarian aid such as the Red Cross Movement may find it difficult to accept that the principle of <i>neutrality</i> can be deemed to be of lower importance than, for instance, <i>informed consent</i>, given that neutrality itself is one of the fundamental principles of the Movement. (1.3) ▪ It would also seem appropriate for some actual performance benchmarks to be set for points 8-12 inclusive (coordination mechanisms, gender equity, human rights, ethical fund-raising, supply chain transparency and efficiency), especially as many organisations cite these aspects (or at least some of them) in their mission statements, internal code of conducts and other published documents. (1.4) ▪ I found the wording in (1.5) difficult to understand – some of the ‘matters’ mentioned seemed to be related to more general inter agency relationships, whilst others are very clearly related to the active focus and scope of work of the organisation.

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R37	
R38	
R39	
R40	

B. Benchmark Specific Comments

Benchmark 1

R1	No Comments
R2	No Comments
R3	No Comments
R4	You need to explain what “publish” means in this context, and then add a Means of verification.
R5	No Comments
R6	I think I know what this means but am not sure – does this mean, “... in accordance with the HAP Humanitarian Accountability Covenant?” Perhaps this should be clarified.
R7	<ul style="list-style-type: none"> ▪ 1.3.3 would read better "or their proxies, agree with the proposed humanitarian action and understand its implications" (strictly - pedantically - speaking, you can't agree an implication); ▪ 1.4 "shall strive"; ▪ 1.5 "shall declare";
R8	<ul style="list-style-type: none"> ▪ I don't see the need for a standard, when all the standards together represent a 'system'. This standard should be combined with standard 7 continuous improvement, to imply both that a system is in place, and that it is being continuously improved. ▪ Combine indicators 1 and 2 ▪ Indicators 3 and 4 are insufficient – you need proof of the system working, not simply that it exists ▪ What is the purpose of the 'good practices' section? I know about ISO 9000 already, so what will its mention under 'good practice' do for me....
R9	No Comments
R10	What is meant by 'in accordance with the HAP standard'? Which HAP standard given this is Standard 1?
R11	No Comments
R12	Clear and easy to understand
R13	Possibly add a requirement to inform and train staff to actually use this widely available document on accountability, so that they could be embedded in all we do.
R14	No Comments
R15	With all of the standards the bits on good practice and tools need a bit of explanation.
R16	No Comments
R17	No Comments
R18	No Comments
R19	No Comments
R20	No Comments
R21	While it is a great idea, time and money and resources are limited and this greatly affects the extent of achieving this standard.
R22	No Comments
R23	<ul style="list-style-type: none"> ▪ We understand that this is an umbrella for the other 6 standards but it is not so clear in the wording, probably it will read ..."in accordance with the other 6 HAPI standards.", why standard is use in singular? ▪ See comments on Standard 7
R24	<ul style="list-style-type: none"> ▪ Also, maybe something to verify how well known this system is by staff that actually implement program activities.
R25	No Comments
R26	I think we still need to explain the relationship between an “accountability framework”

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	(which sounds as though it could be a little loose – like the framework provided by the Red Cross Code) and a “quality management system”. This is a key conceptual issue, which runs through all the rest of the standards. It may be appropriate to address this in the forward.
R27	<ul style="list-style-type: none"> ▪ To me it sounds a little strange to have a standard referring to itself. ▪ I like the idea of having an accountability framework and management monitoring system, but I think the requirement is too much focused on documentation. To implementation and documented action is even more important. My I suggest a phrase like: “The agency shall establish, implement and actively use and accountability framework and quality management system throughout the organisation.”
R28	<ul style="list-style-type: none"> ▪ In relation to whether the requirements will definitely add value to the accountability process, just publishing information on “accountability and quality standards, codes, guidelines, and principles committed to by the agency” is not sufficient. Clarity on how these translate into practice and an element of reporting against compliance with them is also needed. This can perhaps be captured under means of verification; e.g. Documentation that clarifies how each of these standards, etc support each other and how they will be operationalised; proof that resources are in place for such standards, principles, etc to be enforced; ▪ Also, means of verification 4 requires a bit more clarity; disseminated within the agency to all/relevant individuals, in user-friendly format, etc
R29	Prioritisation is a challenge therefore commitment by each agency is very much needed
R30	There are three different terms used for, I think, the same thing – ‘accountability framework and quality management system’, ‘accountability and quality management system’ and ‘accountability management system’. This needs to be more coherent.
R31	Oxfam together with its partner organizations has established and documented accountability action plan to improve its accountability to beneficiaries, stakeholders and donors.
R32	Good practices – I understand these sections still have to be developed. As noted before, Sphere is relevant to this standard: see Sphere notes ESC 200406 meeting (included once more with these comments), HAP-I standard 1
R33	No Comments
R34	<ul style="list-style-type: none"> • Means of Verification: A possible MoV could be review of audit function, assessing whether it looks “downwards” as well as “upwards”. This could also tie in with MoV 5 for Standard Seven. • Good Practices: could also include Transparency International
R35	It could be interesting if the “Accountability” is explained in terms of Administrative and Operational issues. Depending the reader the accountability is understandable, so feasible to apply.
R36	<ul style="list-style-type: none"> ▪ The development of the systems probably needs to be determined initially internally, within the organisation, and then sent out to check that it covers all the points required. ▪ For the system to be successfully implemented it will need ‘buy-in’ from all levels of staff, including top managers. If the accountability to beneficiaries is not deemed to be important at the top, it will not be implemented at the bottom. It might be worth, therefore, considering an additional means of verification related to how far staff have read and understood the systems and are committed to implementing them.
R37	
R38	
R39	
R40	

Benchmark 2

R1	NO COMMENTS
R2	No Comments

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R3	<ul style="list-style-type: none"> ▪ I appreciate the prominence given to Standard 2, and Standard 3, in particular. I think both are central. They can, perhaps, go further. ▪ A major issue, and increasingly so, I think, is that money is wasted (in some cases, massively) on expenditures that are not/would not be priorities for affected people, were they to know about them (standard 2) and be involved in deciding about them (standard 3). ▪ I assume that the concept of ‘honesty’ is implied in the word transparent, and therefore as a component of the transparency standard as it refers to public information. I would like the word, or a synonym to appear somewhere (e.g. ‘accurate’), given the amazing amount of spin in agency reporting, even by well recognized agencies. As but one example, see this Oxfam job advert (circulated through ALNAP 16/05/06): <ul style="list-style-type: none"> ▪ Subject: Oxfam Humanitarian Advocacy Advisor Wherever in the world they’re based, the results achieved by our Humanitarian Support Personnel are truly astounding. A diverse and international group, they provide support where it’s needed most, moving directly to areas of the world affected with humanitarian crises. ▪ Many more exist by a variety of agencies, and more directly related to performance in actual programmes and operations and tied to fundraising from or reporting to the public, both donor and affected. ▪ In short, I would give greater importance and profile to the issues of information and transparency. For instance, under standard 2, I would add something about transparency/publishing budgets and costs. I have not found anything explicit on this in the draft. It is central to accountability. Monies collected in the name, on behalf, and for the benefit of specific people should be spent in a way that is at least transparent to them. There should be an explicit commitment to publishing budgets and detailed final accounts (including detailed costs of salary scales, missions, consultancies, etc.)
R4	<ul style="list-style-type: none"> ▪ It is not clear what “progress” means in this Standard, progress in what? ▪ The Tools will need to make clear what is reasonable in terms of publishing information on the organisation and its systems - all is unfeasible and not helpful to those who are intended to benefit from access to this information.
R5	No Comments
R6	No Comments
R7	Standard 2 d). The first three "its" (a, b, c) refer to the agency while "d) its progress" refers to the programme, as is clear from requirement 2.1, verification 3. On way of clarifying this would be to change to "and d) their progress", which would make the reference ("their") to the humanitarian plans in c);
R8	<ul style="list-style-type: none"> ▪ Must an agency provide evidence that it meets all the means of verification, for it to be in compliance? Please clarify. ▪ If an agency must meet them all, there are too many. ▪ If an agency must meet a subset, which ones should it meet? ▪ You can delete most of the ‘means of verification’ in my view, and retain only 2.1.4; 2.1.7; 2.2.1; 2.3.2 (combine indicators 1& 2); and 2.3.3 ▪ Again, by mentioning ‘Mango’ and ‘ALNAP’ as a ‘good practice’ I am not helped ▪ Too many tools. Please prioritise.
R9	Publishing information and making it accessible to beneficiaries are two different things. It already exists that this information is published but functionally inaccessible to beneficiaries due to language, educational, technological or other barriers. How is this information to be made meaningfully accessible to beneficiary communities? How often do beneficiaries currently access the information that is already published about NGO’s? Somehow, I think the standard should have more to do with accessibility to the organizational information. (Publishing the information is more of a means to that end.) As it is – I am unconvinced that standard two will necessarily have a general or broad impact on beneficiary accountability.
R10	Is ‘publish’ the right term as this infers formally publishing on the web and in publications when what seems to be meant is to make this information public and easily available in the local context. Perhaps something like ‘The organisation shall publicly share information on....’ would be clearer ?

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R11	The publication of progress should be on Internet without any password.
R12	For local organization, “C” depends on availability of fund, Mostly they work with limited money, with no option for publication. This is particularly a problem when local organization works as sub-contractors to help distribute relief items.
R13	No Comments
R14	No Comments
R15	<ul style="list-style-type: none"> ▪ ‘the agency shall ensure that information’ – needs to say what information e.g. information about ▪ I was looking for this standard for something explicit about the need to publish information on funding and budgets, ideally as a separate requirement; ‘ the agency shall make available information about the funding that it has available, where it has come from and it’s budgets for providing humanitarian assistance.’
R16	No Comments
R17	No Comments
R18	No Comments
R19	No Comments
R20	No Comments
R21	Most agencies never share or publish their plans and progress, they just report on what has already been accomplished. It would be great if 2.2 and 2.3 could be accomplished though.
R22	No Comments
R23	We can only commit to make CA information available to partners (in English), so they can share/translate with beneficiaries, as they consider necessary. However, beneficiaries would be more interested about partners’ information. We as CA could encourage partners to adopt an accountability framework and share partners’ information with beneficiaries. Complying with the standard’s requirements will then depend on partners’ capacity and ability to afford this. Should CA commit to provide funding for these activities (publication, translation)?
R24	Perhaps something on the agency explaining its mandate. If I were a beneficiary, I would want to understand why the agency is doing what is doing. Is it because of a God-given imperative? The benevolence of the public in rich countries, belief in a humanitarian charter? This would support their understanding of why the agency should be accountable to them.
R25	No Comments
R26	<ul style="list-style-type: none"> ▪ I wonder if some of the aspects of requirement 2.1 could be included in the headline of the standard? As Standard 2 reads, it appears that it might be possible to comply with it by publishing a whole lot of policies and organisational level reports (of questionable quality and transparency) on its website. This would be misleading. How about re-phrasing the standard along the lines of “For each humanitarian intervention, the agency shall make key information about itself and its intentions (defined in requirement 2.1 below) publicly available and easily accessible to its intended beneficiaries and their representatives.” ▪ A new requirement 2.1 could be inserted to read “The agency shall make the following information publicly available: (a) organisational mission, objectives, values, national base and size, (b) its accountability framework and quality management system, (c) its specific plans for the intervention (including objectives, activities and summary budget), (d) regular progress reports.” ▪ The existing requirements 2.1 – 2.3 could then all be shuffled down to become requirements 2.2 – 2.4. ▪ The existing requirement 2.2 would be greatly strengthened if it included a requirement to publish the specific contact details of a named member of staff. ▪ The existing requirement 2.3 could also be strengthened by specifying that this information is required for the specific humanitarian intervention, not for the organisation as a whole.
R27	No Comments
R28	<ul style="list-style-type: none"> ▪ I suggest that requirements be linked directly to a), b), c) and d) in the standard. ▪ More clarity is needed on what organisational background entails and the type of information that should be included in progress reports ▪ Agencies include name and contact details in all publicly available information; the

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	<p>challenge is in including contact details of staff that is responsible for different aspects of the agency’s work, so that beneficiaries know whom to contact on different issues that interest them</p> <ul style="list-style-type: none"> ▪ General comment for verification: resources are allocated for this + senior manager has oversight responsibility to ensure proper implementation ▪ Good practices: GAP Transparency guidelines
R29	The same as my comment made for the standard 1 above.
R30	<ul style="list-style-type: none"> ▪ It would be helpful to make clearer the ‘level’ of programming or organisation that this is to be applied – or be clear that this is a judgement call and organisations NEED to make it. ▪ I don’t think organigrams work for beneficiaries – need to find a better way to communicate 2.3 to beneficiaries.
R31	Field information brochures have been prepared on organizational background, programme scale and scope, and details of contact persons to improve information flow top-bottom. This is translated into local languages.
R32	<ul style="list-style-type: none"> ▪ 4: ‘public’ in this context means? Does it include affected population, donors, general donating public? ▪ What are ‘accessible’ sites? ▪ Good practices: See Sphere notes ESC 200406 meeting, HAP-I standard 2 ▪ Tools: 4. and 7, seem to repeat the same point. Can positive experience of the usefulness of such examples be cited? 6. What are information point hubs?
R33	<ul style="list-style-type: none"> ▪ Under b) different agencies would have different parts to their quality management systems e.g SC would certainly include its child protection policy and staff code of conduct as part of its quality management system. ▪ What does “information” include – radio, posters etc... ▪ “Local language” needs to be the most appropriate language as many local languages are not written down – and also many beneficiaries do not have access to the written word due to a lack of literacy and therefore this needs to be taken into account. Written words do not mean that the standard is necessarily complied with. ▪ Is this standard about “information management” or “decision making”. Where is the emphasis needed in this standard?
R34	<ul style="list-style-type: none"> ▪ Standard wording: we felt the wording should indicate that this standard is directed at the field level. We questioned if b) accountability framework and quality management system was too detailed/technical and a simpler statement would suffice eg. “it’s systems of accountability” ▪ Requirement 2.3 We felt this was unnecessarily all encompassing (the structure of the whole organisation?) and should emphasise relevant organisational structure and staff roles at the field level/in the delivery of assistance
R35	Affordability could be less than expected if the organization are developing in conflict context, or where the security for NGO is on risk.
R36	<ul style="list-style-type: none"> ▪ It may be difficult to publish and disseminate very detailed plans (2.1) from an early stage as many programmes (and the subsequent project activities) develop with time and adapt to changing situations. Initial broad plans should be published, and then subsequent major changes to those plans should be released. It should be noted however that beneficiary input (and acceptance) should be sought before any major changes in plans could take place. ▪ It is probable that several different formats and media will be required to ensure access by all beneficiaries, especially the most vulnerable – statements on notice boards is probably not sufficient to reach all those being served by the programme. ▪ Progress (and reasons where progress is not as it had been hoped) should be published at regular intervals, and then more frequently where changes have occurred – necessitating a schedule of information release. ▪ It is not clear whether financial information should be included in the information to be published or not. There may be security issues attached to this in certain situations.
R37	
R38	
R39	
R40	

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Benchmark 3

R1	ACFID secretariat is non-operational and therefore doesn't work with/support local communities
R2	No Comments
R3	<ul style="list-style-type: none"> ▪ I appreciate the prominence given to Standard 2, and Standard 3, in particular. I think both are central. They can, perhaps, go further. ▪ In line with the above, standard 3 might also include 'budgeting' explicitly (i.e. 'design and budgeting').
R4	3.3, Means of verification 2 is unclear - what "beneficiary criteria"? or criteria for what?
R5	Simply said more information and experience is required to answer this question meaningfully.
R6	Suggest substituting "by" for "through" in the standard
R7	No Comments
R8	<ul style="list-style-type: none"> ▪ I disagree with isolating 'informed consent', and feel you have missed the point. The importance is about establishing a meaningful dialogue and feedback with beneficiaries. Your standards only currently state that consent must be obtained, and that complaints mechanisms must be established. ▪ I think you should change this standard to be about feedback. One of the requirements should be about informed consent. ▪ The following means of verification can be deleted, in the interests of simplifying things: 3.3.3; 3.3.5; 3.4.1; 3.4.2; 3.4.3 ▪ Too many tools
R9	<ul style="list-style-type: none"> ▪ Gaining informed consent is a crucial standard – for respecting others and pursuing sustainability. Seeking genuinely informed consent, however, is very challenging objective. My concern is that in a document like this the pivot word will be 'seek.' Gaining informed community consent is not an easy process – even when working in your own community with your own language. I would be concerned that agencies can say they have 'sought' consent, therefore fulfilled Standard Three yet never really have achieved informed consent. ▪ Much of this challenge has to do with 3.3. The time and cost involved in gaining consent. Agencies and donors will have to begin to adopt different funding, planning and project implementation policies that are responsive to the requirement of consent. As it is, an NGO may struggle to have the funding or time to develop genuinely informed and consenting/non-consenting opinions from prospective beneficiaries. Are donors willing to be more active in addressing this reality or will funding requirements create unrealistic time constraints? Are NGO's who feel they need to be publicly seen (to be positioned for funding) as responding within 24-48 hours to emergencies such as the Tsunami also taking the time to gain informed consent? ▪ I suppose – there is a degree to which NGO's , governments and donors have a responsibility to beneficiaries to begin re-educating the donating public regarding the time requirements necessary to 'do no harm.'
R10	No Comments
R11	How do you select beneficiaries' representatives? A whole literature shows how NGOs hardly reach the poorest and the poor and tend to strengthen existing social hierarchies, especially when they have to work through interpreters and so-called "traditional" chiefs.
R12	Sounds a bit unclear, please make more simple and straight
R13	No Comments
R14	No Comments
R15	<ul style="list-style-type: none"> ▪ I wondered if standard 3 wasn't trying to shoehorn too much into one standard. Should there be one standard about participation – the agency shall seek to enable beneficiary representatives to participate in programme decisions? And one about informed consent – the agency shall seek the informed consent of beneficiaries for the assistance it provides? ▪ the devil's obviously in the detail with this one and the key term is beneficiary representatives. I wonder if there's a need to a specific requirement about

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	<p>identifying representatives. In identifying representatives the agency will strive to .. not sure what the phrasing would be but avoid working just with unrepresentative and potentially nasty elites is the gist. Otherwise, the US military in its work with warlords in Afghanistan could claim to be working with beneficiary representatives.</p> <ul style="list-style-type: none"> ▪ 3.1 I think you need to say participation in what – enable beneficiary participation in humanitarian action. ▪ Doesn't 3.4 duplicate 3.2?
R16	<ul style="list-style-type: none"> ▪ 3.2: I would add "The agency shall provide support and work with community to identify representatives of the beneficiaries community for participation in all stages of project cycle". ▪ 3.3: suggest to add one more point: Encourage community to develop criteria for beneficiary selection. If we don't add this point it will look like the criteria only develop by the agency with no involvement, participation and decision making by respected community. What do you think?
R17	No Comments
R18	No Comments
R19	No Comments
R20	No Comments
R21	It is always good to involve beneficiaries in program decision making but at the sametime it is time consuming. Also in some emergencies, there is no time to consult beneficiaries but rather the goal is to alleviate suffering as fast as possible
R22	No Comments
R23	<ul style="list-style-type: none"> ▪ From the standard wording, it is unclear what decisions we are talking about, that should include the entire project cycle from design to evaluation but not involvement in every single decision of the project. The requirements clarify this quite well. However we suggest a bit of rewording: "...participate in programme decision processes". ▪ We believe some of our partners are already complying with this standard and requirements and we commit to encourage them and others to comply. That will be part of CA's accountability work plan. ▪ Requirements 3.1. and 3.2 are written in a top-down manner : "The Agency shall specify the process..."and "The Agency shall identify representatives..." We believe beneficiaries should be part of deciding the processes that will enable their participation and, of course, they should be selecting their own representatives (the agency will have a role in ensuring that all community groups feel represented by their "representatives").
R24	Consent for what?
R25	No Comments
R26	<ul style="list-style-type: none"> ▪ The standard mentions some key concepts without defining them in operational terms, specifically: "informed consent", "beneficiary representatives" and "participate". I don't think it's clear what these mean exactly. There are a lot of ideas here which I think could – and have to be – presented more clearly, to develop a more focused and easily-understandable standard. E.g. could it be re-phrased along the lines of "The agency shall ensure that beneficiary representatives meaningfully contribute to all key programme decisions, including the allocation of resources." ▪ Requirement 3.1 could be worded more clearly: what does "specify the processes to enable participation" mean? ▪ Requirement 3.2 is critically important, and I think needs more attention. In particular, agencies have to satisfy themselves that the representatives they identify are perceived to be <i>legitimate</i> by the wider beneficiary population. As a necessary precursor to achieving this, the agency has to satisfy itself that it has an adequate level of understanding of different social and political interest groups in the beneficiary population. I think this has to be spelt out explicitly in a new requirement (between the current requirement 3.1 and 3.2), otherwise it risks being lost – and then 'beneficiaries' become a homogeneous group again. Disaster! ▪ Requirement 3.3: It is not clear whether the agency shall inform "beneficiary representatives" (consistent with requirement 3.2), or the entire beneficiary population (associated with public information requirements under standard 2). This

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	<p>distinction has to be made. In the second bullet point, what does the word “register” mean: ‘record’, ‘acknowledge’ or ‘ask for’? I think this is ambiguous at the moment.</p> <ul style="list-style-type: none"> ▪ Requirement 3.4 I like this – I think it’s much clearer than the preceding requirements. It might also be useful to specify what “programme implementation arrangements” means – for instance, planning, implementing, reviewing & evaluating programme activities, including making resource allocation decisions.
R27	<p>This is a tricky one. In principle I totally agree on the participatory approaches. However, there are situations and given contexts when this standard can be questioned and even viewed as contra productive.</p>
R28	<ul style="list-style-type: none"> ▪ 3.1 – this information needs to be disseminated in a user-friendly format to beneficiaries (not sure if this is clearly implied in standard 2) ▪ 3.2 shouldn’t beneficiaries and agency jointly identify representatives? ▪ 3.4 this should specify design, implementation and evaluation; not just implementation ▪ General comment for verification: resources are allocated for this + senior manager has oversight responsibility to ensure proper implementation ▪ For the good practice, Tools sections: see GAP Participation guidelines – policy content and practice sections in particular
R29	<p>The standard 3 is very important and quite often seen as one of the gaps for humanitarian agency to fulfil.</p>
R30	<p>3.3 – 1 and 3.3 – 5 do not make sense to me. What is meant by ‘contracts’ and ‘consent requests with the documented steps’.</p>
R31	<p>A communication framework has been established and documented where the beneficiaries are consulted on design, methodology and proposed changes in the programme, enabling the communities to plan, manage and monitor their progress in shelter project.</p>
R32	<ul style="list-style-type: none"> ▪ 3.2, 1: ‘stakeholder map’? ▪ 3.2, 2: Not clear what purpose interviews would serve ▪ 3.3, 2: Is it possible to identify representatives of the beneficiary community (3.2) before ‘establishing beneficiary criteria’? I think this point partly stems from confusion around meaning of ‘beneficiary’ that was highlighted in previous comments: ‘In Standard four (ie previous standard 4), indicator 4.1, beneficiary representatives should ‘participate in setting criteria for beneficiary selection’. This implies that not all ‘beneficiaries’ will therefore necessarily be ‘beneficiaries’ of the humanitarian aid, at least in concrete terms. This needs to be clarified. ‘Affected people’ or similar term would be more appropriate where the reference is not to ‘recipients of aid’. ▪ 3.3, 4: ‘procedures for field worker use’ on what? ▪ 3.3, 5: ‘time frame of consent requests’ – not clear what this means. ▪ 3.4, 5: (as above, point 3.3, 2) What’s the difference between ‘beneficiary representatives and beneficiaries’? ▪ Good practices: See Sphere notes ESC 200406 meeting, HAP-I standards 3 and 5 (which became standard 4 in the version 2, and has now been combined with standard 3 in version 3)
R33	<p>As our key beneficiaries are children there are considerable cost – not least in terms of time when considering this standard – however these costs are not insurmountable and as an emergency develops it will become easier – but in the initial stages – particularly the need for identifying beneficiary representatives – as we would try where possible to have children in this role rather than adults on behalf of children – but this takes time and in new environments. An interesting challenge!</p>
R34	<ul style="list-style-type: none"> • Requirements: we felt that a requirement could be added on how the agency shall specify the process of beneficiary identification, which then leads into the process of beneficiary participation, representation etc. • Requirement 3.2 To have consistent wording with 3.1 this could read “The agency shall specify the process to identify representatives...” • Means of Verification: We suggest that one be added to look at evidence of participation during needs assessments • The MoV #5 for 3.3 we felt was very unclear as currently written • As a general reflection there appeared to be a lot of MoVs for this standard. The

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	document needs to clarify if the expectation is that requirements will be assessed using all MoVs listed or a selection of them.
R35	<ul style="list-style-type: none"> ▪ Highest standard is not to work with beneficiary representatives necessary. Our experience has shown us the corruption has achieved also this level of the citizens. Representatives could be the final product of a democratic process, but we can not always ensure this, we are not living in the communities. Maybe it is necessary to set up one more requirements that explain that 100% of the people involved could participate in the programme decisions. ▪ By other hand, to use the term “beneficiary” is part of our challenges to improve the quality of the relation between the “people in the objective community” and the agency. To name them as “beneficiary” is not to empower them, because with the term we are setting them in a statement of “need people”. Fortunately they are not only “people with specific needs” we are trying to work with them. We have found they also are “rich people” that could transform our lives. In fact, we recommend to call them “community involved into the project or program”, or “community objective”, etc.
R36	<ul style="list-style-type: none"> ▪ I am uncertain as to why ‘the agency’ identifies representatives (3.2) as opposed to the beneficiaries themselves putting forward people they believe will represent their aspirations. ▪ Where an organisation has eligibility criteria that not all members of the community are able to meet, the organisation should also be willing to spend time discussing with those people why they do not meet the criteria. If necessary, a written letter explaining the decision to not allow a person / group into the programme should be provided, also explaining how they can access the complaints process if they continue not to agree with that decision. ▪ Beneficiaries should be involved throughout the process of programme implementation until the end, and so should be involved in decisions related to modifications / changes to the original programme. (3.4) ▪ This Standard would seem to be the appropriate point to ensure that beneficiaries have access to a system of providing comments to the programme (not necessarily complaining, which is dealt with in a different Standard), and also to access further information. Communication should be two-way, and not reliant on the organisation giving the beneficiaries the opportunity to be involved at specific instances when the organisation is prepared to listen – there should be constant access available to the beneficiaries. Contact details of speakers of the local language should be made available for this purpose.
R37	
R38	
R39	
R40	

Benchmark 4

R1	ACFID secretariat is non-operational and therefore doesn’t work with/support with local communities
R2	No Comments
R3	No Comments
R4	Tool 2 does not seem like a tool for a Standard. See below my general notes on Tools.
R5	No Comments
R6	<ul style="list-style-type: none"> ▪ Suggest revising standard to state, “The agency shall establish procedures to identify and support age, gender and diversity-balanced local capacities.” ▪ I think could be clearer to specify that this is about building local capacities of beneficiaries (first and foremost), groups composed of members of the beneficiary population, and local organizations such as NGOs and CBOs. ▪ 4.1 suggest also revised to state “The agency shall conduct an age, gender and diversity-balanced local capacity and vulnerability analysis.... ▪ 4.2 suggest also revised to state “Allocate resources appropriately to ensure local

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	capacity is....”
R7	Standard 4, requirement 4.2. Something is wrong - should "enable" be "ensure"?
R8	<ul style="list-style-type: none"> ▪ I understand you are stating that local capacities are inherent in quality; but it seems a little arbitrary. This should be commonly agreed best practice already. It is not an accountability standard. ▪ If you insist on keeping this standard, then means of verification 4.1.1 is unnecessary
R9	A critical standard.
R10	The requirements do not look at what governance or organisational commitments or policies are needed to guide the establishment of processes. Perhaps going back a step to include a requirement like ‘ The agency has a stated commitment and policy that guides the establishment of processes.. “ may add value?
R11	Publish the capacity and vulnerability analysis as a diagnostic available for ex-post evaluation.
R12	Probably, we should write...Establish a process or procedure to
R13	No Comments
R14	No Comments
R15	<ul style="list-style-type: none"> ▪ Is there a need to say local capacities for what – otherwise it risks being meaningless. The agency shall establish procedures to identify and support local capacities to deliver effective humanitarian assistance and prepare for future disasters. ▪ need to say what local capacities are being supported – otherwise NCA arguably supporting the capacity of the SPLM to wage war would be fine. ▪ Should the local capacity and vulnerability analysis have a specific bullet point about governments? So analysis including: <ul style="list-style-type: none"> • Individuals • Groups • Organisations ▪ The affected state at local and national levels
R16	No Comments
R17	Beside resources allocation to capacity building its also important to allocate resources to reduce vulnerabilities at community level.
R18	No Comments
R19	No Comments
R20	No Comments
R21	Sometimes when procedures are made public knowledge, then the authorities in place or even other people find a way of getting support that is not meant for them
R22	No Comments
R23	We felt this should <u>not be an standard</u> , to identify and support local capacities is a good practice and a way of working but that does not imply that an agency is accountable to beneficiaries.
R24	<ul style="list-style-type: none"> ▪ "Local capacities" sounds a bit obtuse. Also, this could be a huge area of work. It would be helpful to better understand how this ties to accountability and why this is a standard. ▪ What does this mean? ▪ This could be a huge area of work. It would be helpful to better understand how this ties to accountability and why this is a standard.
R25	No Comments
R26	<ul style="list-style-type: none"> ▪ I don't understand what this standard is driving at, why it is a key component of humanitarian accountability, or how it relates to the other standards. I think this standard needs serious revision. ▪ For example, “local capacities” could be understood at many different levels, from the capacity of local staff, to local organisations to local government. Which one is most important? I doubt that requirement 4.1 (covering all of these) is feasible. What does it mean to “conduct a capacity and vulnerability analysis”? This is very soggy – in my view, it does not provide the clarity of thought & action needed for a requirement. Requirement 4.2 is also soggy.
R27	Again a tricky one. A difficult conflict situation can prevent us from using local capacities

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	due to risks and impartiality. But the principle is fine.
R28	I would link this to contingency planning practices and the need for coordination (perhaps worth having a brief conversation about this in terms of how a rigorous analysis can be undertaken in an emergency situation)
R29	Again, similar comment to the standard 1 above.
R30	I find 4.2 very limited, I don't think this is all supporting local capacities is about. What about including information sharing and gathering, implementation and M & E, etc.
R31	The Oxfam programme is working through local partners and community based organizations to ensure ownership and sustainability of the programme as Oxfam phases out of the region.
R32	<ul style="list-style-type: none"> ▪ 'local capacity', 'capacity building' needs to be defined (See notes on glossary). ▪ Good practices: Sphere Standards Common to All Sectors, Standard 8: supervision, management and support of personnel, has a reference to capacity building in guidance note 5. ▪ Tools: not clear what is tool 1.
R33	Details on implementation requires further clarification. Under requirements – 4.1 the word vulnerability led the team to think it was about beneficiaries. Under 4.2 - add the word “and sustainably” after appropriately. Also we thought this standard was about capacity building and yet it appears to me about more – so its not clear. And also resources for building longer term capacity may be different.
R34	<ul style="list-style-type: none"> • We felt this standard as currently written was weak. It doesn't seem to state much more than is already stated in the Red Cross Code of Conduct – it needs to show how the standard complements/expands upon the RCCC and relates to accountability eg. “to identify and support local capacities in order to....” • MoV for 4.2 we felt was weak as currently worded • Good Practices: Tearfund has a resource “Reducing Risk of Disaster in our Communities” which would be relevant to this standard
R35	No Comments
R36	<ul style="list-style-type: none"> ▪ The results of the capacity and vulnerability assessment analysis should feed into the planning process of the organisation (4.1 – means of verification no 2) – the wording needs to be improved. ▪ Plans that reflect the results of the analysis should allow for resources to be allocated, but it might be more appropriate to allocate resources as per analysis. For instance, rather than list areas where local capacity can be utilised eg recruitment, partnering etc, allocate as for 'individuals', 'groups' and 'organisations' to ensure that maximum local capacity is utilised. (4.2)
R37	
R38	
R39	
R40	

Benchmark 5

R1	NO COMMENTS
R2	No Comments
R3	No Comments
R4	<ul style="list-style-type: none"> ▪ 5.3, Means of verification 2, not clear who will review what exactly. Surely not confidential personnel documents by outsiders, so presumably just the templates for appraisals. ▪ I like the Accountability competences idea. ▪ But Competence 9 is not clear.
R5	No Comments
R6	No Comments
R7	No Comments
R8	<ul style="list-style-type: none"> ▪ Performance improvement of which staff for what performance? All performance, or just accountability-related? ▪ Means of verification 5.1.2 can be deleted, as can 5.2.2 and 5.3.1

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	<ul style="list-style-type: none"> ▪ You can combine 5.2 and 5.3 and call it ‘continuous improvement’. As it stands now, unnecessary cumbersome ▪ Too many good practices
R9	No Comments
R10	No Comments
R11	Does it mean NGOs will publish a databank of staff competence / or failure? This is to prevent an NGO hiring a crook who has just been fired by another.
R12	No Comments
R13	No Comments
R14	No Comments
R15	<ul style="list-style-type: none"> ▪ I suppose this relates to quality but it felt to me like a very generic standard about good HR practice that could do with being related a bit more directly to the issue of accountability. So the principle would be in part about the agency having a responsibility to be accountable to staff as well as beneficiaries. ▪ The agency shall ensure that all staff understand the organisations principles and mandate and are able to explain this to beneficiaries. ▪ The agency shall establish and implement effective complaints handling procedure that are accessible and safe for staff ▪ The agency shall provide training and monitor staff performance to ensure that staff behave appropriately to disaster affected populations respecting dignity. – I’m not sure about this phrasing but I think it gets at something important which is about the way staff treat and interact with beneficiaries which is often deeply problematic and inimical to the sort of accountability the rest of the standards are trying to promote. ▪ The standard and its requirements are also typically aid agency warm and fuzzy – how about some iron fist in the velvet glove? One of the key aspects of accountability I think is some notion of censure. How about a requirement like; the agency shall put in place clear procedures to discipline, fire and legally prosecute staff found to have abused positions of trust and power in their work with disaster affected populations’.
R16	No Comments
R17	No Comments
R18	No Comments
R19	No Comments
R20	No Comments
R21	No Comments
R22	No Comments
R23	<ul style="list-style-type: none"> ▪ Again here, we can commit to share with partners the systems CA has in place for staff performance management and encourage/ build capacity for partners in adopting similar systems to monitor staff performances. We believe that this should be taken and affordable by our partners without much need of additional resources (we already fund core cost for them) however some smaller partners may have difficulties in complying with it. ▪ Suggestions to improve the requirements: <ul style="list-style-type: none"> ○ To add a requirement about improving ability on recruitments procedure/decisions ○ 5.2 should say “...to review staff performance management” (we mean here to include dismissal procedures and formal warning procedures) ▪ On the Good Practices, we do not see how useful it is to share specific agencies’ policies in appraisal and review and other policies, as SC Child protection policy, 360 reviews from Oxfam, IRC reporting policy. We could end up with a whole list of individual agency’s policies and procedures.
R24	Again, it would be good to tie this accountability, e.g. specify that a required competency is that each staff believes in the humanitarian mandate.
R25	Should this be “knowledge of organizational culture”?
R26	<ul style="list-style-type: none"> ▪ Point (d) above is the killer for this wording of this standard. Most agencies could reasonably claim to meet standard five as it reads above. But mointoring competence is a thousand miles from achieving staff competence. The previous draft of this standard made a lot more sense to me: “personnel shall be competent”. This current draft reads like a typical NGO fudge, which risks generating ever more

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	<p>bureaucracy. I don't think it will make a blind bit of difference in driving good performance and accountability.</p> <ul style="list-style-type: none"> ▪ In particular, it is crucially important that staff remain committed to the core values of humanitarian accountability, including respect for and dialogue with beneficiaries. This is missing from many job descriptions (couched in technical terms), but is THE most important single factor in achieving HAP's overall goal of accountable humanitarian action. I think this link (between this standard and effective downward accountability) also needs to be made explicit. ▪ I would prefer to remove this standard entirely than keep it in its present form.
R27	Very good and important standard.
R28	<ul style="list-style-type: none"> ▪ I left this blank on purpose – there are two issues that I want to flag up here: <ul style="list-style-type: none"> ○ need to ensure that staff appraisals/performance indicators include proxies on accountability and learning; compliance with accountability principles, etc; this is an area that is currently heavily underdeveloped ○ induction and on-the-job training on non-technical skills; but in relation to what accountability standards and principles mean in practice ○ both these need to be linked to internal learning mechanisms/community of practice, etc
R29	No Comments
R30	Fine!
R31	Upon setting performance objectives, the staff are managed through performance review and given feedback and necessary training to improve their service delivery.
R32	<ul style="list-style-type: none"> ▪ Not clear in the standard whether the focus is on general staff 'competence' – ie professional competencies including appropriate education, training, experience, skills – or specifically on 'accountability competencies' as given in the list at the bottom of the page. This needs to be clarified. It affects particularly, for example, 5.1 – a 'statement of required competencies' means what exactly? How are the skills, listed as accountability competencies measured? As noted before, are attitudes, values, approaches to work included? See Sphere notes ESC 200406 meeting, HAP-I standard 4 (which is standard 5 in version 3). In particular, Sphere makes reference to knowledge/experience of local cultures and customs, and the attitudes of aid workers ▪ 5.1, 1: Can recruitment files be reviewed without breaching confidentiality? ▪ 5.3, 1: Are staff training records only relevant to 'continuous staff development'?
R33	Why is the word "statement" used? Feel this standard has only the very minimum that is required for staff management. Nothing on conduct – Red Cross or agency codes. Nothing on good practice, induction, etc or support to staff. Mechanisms for tackling poor performance are critical and not included. Also nothing linking beneficiaries to staff performance. Overall not an ambitious standard!
R34	<ul style="list-style-type: none"> • We felt that this standard as currently written was too broad – looking at staff competence in general – and should focus more on accountability. • Requirement: similarly very broad statements around staff competency, performance and development. We see the critical HR areas as they relate to accountability not to be in technical competency (eg. being a competent Nutritionist) but in soft skills: the importance of relationships, dignity and respect etc – these are what we'd want MoVs to assess • Good Practices: we felt too many were listed at present and there needs to be more focus on the key documents. Also need to avoid giving contact names of people, as these change over time
R35	No Comments
R36	<ul style="list-style-type: none"> ▪ In practice appraisal / reviews of staff performance are difficult, especially in the humanitarian field where the situations are often very complex, with conflicting issues often arising at the same time. This does not mean that staff performance is not important, only that more thought needs to go into the wording of this standard. To ensure a high level of accountability and a high quality of service provision to beneficiaries, staff need to understand the importance of these issues. It might be possible to break down the aspects of staff performance into different items such as a) attitude and behaviour when implementing programmes as well as the use of skills and knowledge b) the appraisal process itself and how accountability is

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	<p>reflected in it, c) how JDs reflect the need for specific people to be responsible for specific parts of the process eg receiving complaints and ensuring they are dealt with, being a contact person for beneficiaries to comment on activities etc.</p> <ul style="list-style-type: none"> ▪ Alongside the staff performance issue, there is the greater one of the organisation itself and how far it is willing to actually learn from shortfalls or ‘failures’. I am not sure it should be part of this standard, but there should be a commitment from an organisation to actually actively try and improve the quality of service etc. This may involve the publication of examples where the organisation has not performed as expected, and clear plans / solution backed by a commitment to reduce the likelihood of the same problem reoccurring in the future. ▪ There is a large financial aspect attached to the implementation of this standard – budget lines would need to reflect the commitment to undertake the actions needed in this Standard.
R37	
R38	
R39	
R40	

Benchmark 6

R1	This standard is one of the most important for accountability to beneficiaries. ACFID already has a complaints handling procedure in our Code of Conduct – however, this complaints handling mechanism isn’t for beneficiaries, it is for violations of a code that monitors Australian-based NGO operations. We have found that handling complaints in a timely, confidentially and professional manner is most important.
R2	No Comments
R3	No Comments
R4	6.4, Means of Verification 2 - what does “integrity” mean here?
R5	No Comments
R6	I don’t think Standard Six is very clear as it sort of mixes complaints regarding NGO performance in the eyes of beneficiaries vis-à-vis what they are there to do and then references the Building Safer Organizations project which, of course, covers complaints mechanisms vis-à-vis staff sexual misconduct against beneficiaries. We need complaints mechanisms for both but they’re different. I think HAP needs to be specific in terms of what they’re talking about which I believe is the former.
R7	Requirement 6.3. "beneficiaries are aware of:" would read better than "have understood:".
R8	<ul style="list-style-type: none"> ▪ Complaints mechanisms are a relatively small subset of the relationships, continuous feedback and programme response that are inherent in accountability. Yes they are important, and they need to be established carefully, but your system of standards excessively emphasises them. ▪ You can delete the following means of verification: 6.1.1; 6.3.1; 6.4.2 ▪ The ‘building safer organisations’ framework is a tool, no?
R9	<ul style="list-style-type: none"> ▪ It is often difficult for beneficiaries to complain if they fear loss of services. In some cultures it is difficult to complain to NGO staff who may be viewed as ‘higher status.’ – It would be worth adding in the tools section that NGO’s develop some sort of external system for complaints or community feedback so the community isn’t always required to speak directly to the agency or staff that are involved with the problem. I think it is feasible but a challenge to do meaningfully. ▪ It’s easy to get beneficiary feedback forms filled out but validating the responses rarely ever happens. More assistance to agencies regarding providing suggested training and effective tools and methods for establishing genuine and open channels of what is often awkward communication for communities is necessary. The current suggestions are good starting points – but many of them break down if the people receiving/channeling the complaints are the same as the ones being complained about.

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R10	As in Standard 4 – would adding a requirement that the agency has a commitment to, and developed, a community-based complaints handling process as part of its organisational policies & procedure add value?
R11	<ul style="list-style-type: none"> ▪ How do you keep the confidentiality of complainants when the NGO has only on project in one place and can thus identify the source of complaints ▪ “Reports from the beneficiary consultations”: are they written by the NGO? ▪ When access to war-torn countries requires armed escorts, such procedures are not feasible.
R12	Probably, we can write: ‘effective complaints mechanism that ensures easy accessibility and safety of the beneficiaries.’
R13	No Comments
R14	No Comments
R15	No Comments
R16	No Comments
R17	It is comparatively new idea and to bear with this need to create a established procedures and organizational culture
R18	This is my only concern regarding effectiveness of possible respond to the demand of standard 6, related to the capacity of the agency. Even under strong observation, weakness of the agency can damage the process.
R19	No Comments
R20	No Comments
R21	It is not clear at what level and what kind of complaints. It is always better for the agency to work with local authorities or leaders for the beneficiaries in order to deal with such issues.
R22	No Comments
R23	<ul style="list-style-type: none"> ▪ Here as well, we will encourage/build capacity our partners to comply, as our partners are implementing the programmes. Will they have the resources?. We can also give the opportunity for the beneficiaries to complain to CA directly but then we would need to address it with partners. ▪ Suggestions to improve the requirements: <ul style="list-style-type: none"> ○ We would include complains “and suggestions” ○ What about non-beneficiaries?, people who were left out of the project and want to complain about the way the process went? In the standard you say “intended beneficiaries”, then in the requirements “beneficiaries”, should we say beneficiaries’ communities or potential beneficiaries? ▪ Good practice: add something about Social Audit (not only financial aspects but adding other dimensions).
R24	No Comments
R25	No Comments
R26	Very good stuff!
R27	I think in a way this standard is linked to standard three. Effective participation will include effective complaints handling in many cases. When optimal participation for some reason is not possible, effective complaints handling procedures become very important as a corrective information channel.
R28	<ul style="list-style-type: none"> ▪ I checked disagree under point d. above, because unless the agency makes a commitment to address and respond to valid complaints, the complaint handling mechanism will not increase accountability ▪ The requirements need to include an element around “agency makes a commitment to offer a response to valid complaints” ▪ Also, the complaint mechanisms needs to guarantee independence of the complainant from the subject of the complaint ▪ Under good practice/ Tools – I spoke to Zia about this very briefly; we have comprehensive guidelines on complaint and response mechanisms for NGOs and are currently preparing a toolkit on how international NGOs can set up such mechanism, challenges and ways to address those, etc. you may want to have a look at the draft once I send it out for comments; might be interesting to refer agencies to this ▪ When writing the toolkit, I’ve been drawing on some of the experiences that HAP-I members have had in using our complaints guidelines from the GAP Framework

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R29	In general, I agree to all but as experience it seem this standard is hard to fulfil. Therefore, there is a need to make all staff aware about the important of humanitarian accountability and why should we accountable to beneficiaries. This is a big challenge with difficult process but when the mechanism is in place then it will help a lot in improving accountability.
R30	I think that this should go further to include, for eg, the right to redress, the right to appeal, standards around timeliness of agency response, evidence of change in programme or approach.
R31	The pilot complaints mechanism so far has proven to be a useful system to build trust and relationship with beneficiaries.
R32	No Comments
R33	Negative connotation in standard by using the word “grievance” – could it be changed to state positive and negative feedback – as we would like an opportunity for people to praise as well as complain! Seriously it does appear that the emphasis is on the negative and whether this could be addressed. “Feedback committees” might be a more appropriate term. To set up the necessary mechanisms to deal with this will have HR implications – also agencies need to have strong enough grievance and whistle blowing procedures for staff and also be aware of legal implications for an agency and therefore there may be considerable resource implications.
R34	<ul style="list-style-type: none"> ▪ Requirement 6.2. We feel this could be sharpened further by adding bullet points to cover ensuring the recording of complaints and ensuring the feedback system to complainants ▪ MoV 3 for Requirement 6.2. doesn't make sense as written
R35	To set accessible procedures for other, is a challenge of willing for the agencies. The benchmarking is not an strength in the agencies practices, specially because it could reduce their capabilities to rise money.
R36	<ul style="list-style-type: none"> ▪ The complaints process must be developed and then publicised, and the organisation should have clear time periods allocated to each stage within the process to ensure that closure can be gained. ▪ There is also a time issue regarding when a complaint is received, and the closedown date of the programme itself. It is very difficult for a community to complain regarding the standard of build of a permanent house for instance if the issues arise after the programme has packed-up and gone home. (6.2 – parameters and mechanisms
R37	
R38	
R39	
R40	

Benchmark 7

R1	Continuous Improvement is included in the ACFID Code of Conduct, where it specifies that there should be the “provision of regular opportunity to employees for training and professional development”. This would be a useful indicator to include in the standard.
R2	No Comments
R3	No Comments
R4	Standard 7 numbered “6.” in the doc (and Q8 here, just to keep us on our toes!)
R5	No Comments
R6	No Comments
R7	No Comments
R8	<ul style="list-style-type: none"> ▪ Delete 7.1.1; ;7.1.4; and 7.1.5 ▪ Tools have been repeated from a previous standard. You must be extremely selective, and when in doubt leave it out.
R9	My only concern here is that smaller agencies will have a more difficult time complying due to lack of resources or expertise to improve these processes. A next step for HAP-I may be providing resources that enable smaller NGO's to be to accomplish this standard.

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R10	No Comments
R11	Added value not clear. Dissemination: only within the agency?
R12	Like other standards this one (SD-8) is not specific,
R13	No Comments
R14	No Comments
R15	<ul style="list-style-type: none"> ▪ ‘continuous improvement process’ to me smacked badly of the latest jargon – which if these standards are to be lasting is problematic and sounds exhausting – I’m not sure I’d want anything to continuously improve.
R16	No Comments
R17	No Comments
R18	No Comments
R19	No Comments
R20	No Comments
R21	Resources are always a challenge be it finance and time but it is great standard
R22	No Comments
R23	<ul style="list-style-type: none"> ▪ We think this could read together with Standard 1 in only one standard, so set up the system and how to improve it. ▪ Both for Standard 1 and 7, it is unclear for us if this refers only to Humanitarian work or also development work. We suggest to focus on Humanitarian work for now and encourage links to a broader accountability framework at the organisational level (we have one in CA).
R24	No Comments
R25	No Comments
R26	I am only less enthusiastic about this standard because of the same issue I raised in relation to standard one: reconciling the ideas of an “accountability” and “quality management” system.
R27	No Comments
R28	No Comments
R29	It is clear.
R30	Fine!
R31	Oxfam has incorporated the work on accountability in the project workplans, which are then set as milestones and monitored as part of the project cycle management system.
R32	Good practices: See Sphere notes ESC 200406 meeting, HAP-I standard 7
R33	No Comments
R34	<ul style="list-style-type: none"> • We had some discussion on whether the focus of the standard should be on continuous improvement or on a commitment to review and learning. • MoV 3: there may be a danger in the MoVs of over emphasising the review of meeting minutes and records of discussions and decisions, as this could promote bureaucracy for the NGO in its efforts to meet the MoVs
R35	I do not understand the difference between 1 st and 7 th standard. Everyone knows that to establish a quality management system also has to include improvement process. If it do not, it is not a really quality management system, and vice versa. If we want to see in the same standard, we can call it: “to establish a quality and improvement management system”.
R36	No comments
R37	
R38	
R39	
R40	

C. General Commentary

R1	How will the standards fit in with current membership and will there be different compliance mechanisms for work plans to the standards? Will existing members have to meet all the standards to retain membership? Will potential members have to
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	demonstrate they meet the standards to be accepted?
R2	Thanks for making this so simple. For standard Six, I believe that more than and apart form staff monitoring, systems should be strengthened tin the recruitment process to check accountability value system of the individuals. There is a need for developing indicators for helping right recruitment.
R3	No Comments
R4	<ul style="list-style-type: none"> ▪ The ‘Means of verification’ is not a clear concept. How do they differ from Indicators? What does the grammar of many of them mean? Who, for example, “reviews” or “verifies”? Who “interviews field staff and beneficiaries”? Etc. ▪ The status of the Tools is not apparent to me. Some of them exist already - is it proposed to create the others and include them all in a manual? Really? ▪ It’s also not really obvious what the difference is between Good practices and Tools in many cases. Is this just an indication of work in progress? If so, it will be helpful for readers / users
R5	<ul style="list-style-type: none"> ▪ Thanks for sending through the request for feedback. I have filled in the form from a theoretical perspective and I Oxfam GB in DRC may well be in contact soon for the self assessment pack. ▪ Reading the text I don’t have too many problems understanding what it is about. How it will work in various circumstances may be very different and I suggest to organise a field trial under various circumstances as there are many internal and external determining parameters that influence the capacity of a humanitarian actor to shape its response; Camp like situations, compared to chronic crises, compared to natural disasters, compared to clear governmental policies in which aid provision takes place, compared to ability to attract competent and experienced staff to certain crises, compared to international attention and donor interest and commitment, etc. I think it is up to the HAP to devise certain trials that somehow provide a comprehensive picture on how some of the ideas can be taken forward. ▪ In the end of the day, the accreditation should be a meaningful tool and avoid becoming something organisations can sign up to, enhancing their credibility whilst paying lip service to the principles. ▪ The main problem I have with the text is the absence of a clear definition on the intended category of people towards whom the “accountability” should be geared. ▪ Just below I have taken some of the information from the text to explain the problem. <ul style="list-style-type: none"> ○ “Humanitarian accountability therefore involves managing the quality of humanitarian action in order that it respects the needs, concerns, capacities and disposition of people whose welfare and safety is adversely affected by armed conflict or/and [sic] other calamitous events.”[unquote] Page 3, second paragraph ○ “Beneficiaries”, page 6, section 1.5 paragraph 1. but generally through -out the text. ○ “Respect and promote the rights of legitimate humanitarian claimants”[Unquote] Page 16, point 1. ▪ I have edited in the word “or”, since in it is most likely that the category to whom you refer will be in one or the other situation. Nevertheless situations do exist that “and” is applicable. ▪ The three categories mentioned here are not necessarily one and the same. If I summarize the first category as “victims” and the second as “beneficiaries” and the third as “claimants” I come to the following conclusion: <ul style="list-style-type: none"> ○ Victims: all adversely affected by an event. ○ Beneficiaries: Those receiving assistance from an aid provider (The term beneficiary bears with it the perspective of the aid provider) and does not necessarily encompass fully the first category. It also supposes certain behaviours from those who receive. ○ Claimants: The initiative is on the side of this person. A claim is made based on entitlements of which the person should be aware. The supposition is an active attitude of the person. ▪ If the first category is the main category the two others are a sub category that each, for different reasons can coincide with the main category. However it is very unlikely that under any circumstance this would be the case.

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	<ul style="list-style-type: none"> ▪ The qualities or attributes of each category are different. Not addressing this in the convent renders the text inconsistent. That should be avoided.
R6	<ul style="list-style-type: none"> ▪ The means of verification are important but it isn't clear who is doing the verifying – internally within the organization or through HAP or some sort of peer review process. ▪ It would be great if the good practices section provided web site links to those referenced.
R7	No Comments
R8	Remember to keep it as simple as possible. Combine and synthesise whenever you can.
R9	<ul style="list-style-type: none"> ▪ Over it looks great! I think the format is very clear and accessible. I like the addition of the Tools and Good Practices – that is a very helpful addition. Perhaps HAP-I could link to specific documents/websites mentioned there? ▪ I'm not clear on how the compliance to the standards will be monitored. I may have missed it – but I didn't see reference to that. My concern that if it is left to agency self-monitoring then even well intentioned agencies/staff will struggle to obtain valid beneficiary accountability. It really is an art to communicate effectively with communities – and even more so when you are talking about people that are vulnerable and in some way reliant if not dependent on our support. I suppose that is what has prompted most of my comments above – my lack of confidence in accurate self-reporting. I'd like to hear more about the monitoring system – if I've overlooked where that was discussed, please refer me to it. ▪ My other concern is that smaller NGO's will always be involved in humanitarian work. Many of them (like Beyond Borders) are concerned about our impact and relationship we have the in the few communities that we are working in. How flexible is HAP-I or compliance to the Standards towards smaller agencies – so that we can begin operating according to best practice, even if we are unable to establish our own TQM departments? I would think to encourage greater cooperation in the NGO community it would be good to find inclusive ways for smaller NGO's to be engaged in some of these 'bigger picture' endeavors. Otherwise we end up working independently and that creates its own set of issues regarding the best interests of beneficiary communities. – I personally think the Standards would benefit from the involvement of smaller NGO's as well – the whole of our organizations tends to be more focused on and involved with beneficiaries and so we are less inclined to have driving institutional interests that are unrelated to beneficiaries.
R10	Recent large scale humanitarian responses have highlighted that while NGOs are committed to quality and accountability standards and principles such as HAP-I, SPHERE etc, when it comes to designing and implementing a response the values/ideals/principles are often forgotten as agencies focus on the standards. This adversely affected the quality of tsunami programs in Aceh as agencies focussed completely on the outputs/outcomes at the expense of the approach or values that should guide our programs. It is crucial that HAP-I highlights the Covenant and the values/principles that form the covenant as the driving force which are supported by the Standards – not the other way round. In other words agencies commit themselves to upholding the Covenant and the Standards provide a guide for agencies to do this, rather than agencies committing to fulfil the requirements of the Standards. As a suggestion – the covenant must be upfront and centre with the principles etc that form the Covenant while the Standards form the second 'how to' part of the document. Also, I feel calling the document the 'Humanitarian Accountability and Quality Management Standard' further highlights the importance of the Standards over the Covenant. Perhaps something like Humanitarian Accountability and Quality Management Framework or Guide might be considered?
R11	<p>My main concern is threefold:</p> <ul style="list-style-type: none"> ▪ HAP members are NGOs, judges and parties (amongst many examples: during beneficiaries interviews, the cost — and that also means the choice— of the interpreter is the responsibility of the host agency); ▪ control & verification are requested by NGOs themselves. How do you expect "bad" NGOs to comply with HAP standards?

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	<ul style="list-style-type: none"> ▪ fundamental issues are not addressed, such as neutrality and impartiality, relations to donors (especially states), etc. The questionnaire is quite illustrative in this regard, especially when I compare it with our own fieldwork available at: http://www.observatoire-humanitaire.org/etudes_us/burundi.htm; ▪ transparency is not clear. Will the verification results be published and available to everybody, even if they criticise one NGO? I doubt it. Former HAP working papers hardly named names, hence avoided to define social responsibility of specific actors.
R12	As a whole the standards looks great, very specific and easy to understand. I have given you some feedback, which are ignorable. However, you may make your “forward” a bit easy and simple (using easy and short sentences) so that it can be easily understood by the field level staff.
R13	I find the process to be very open and participatory and there is good positioning of HAP among other accountability initiatives. The key strength will be if all agencies committed to accountability would use these tools in their everyday work. The implementation of HAP-I principles is certainly more affordable for large international agencies, who could be instrumental in further promoting and supporting accountability with their local partners and indigenous NGOs.
R14	As for now, I would like to stress once again the value and necessity of including subjective qualities such as attitude, commitment, passion, sincerity etc. in the standard. I agree that these are hard to measure but not impossible. My argument is if these are not mentioned in the standard, it won't get any attention and will not be developed by any relief agencies. I think it will be a great loss in a long run. Like in our families, qualities such as love, bond with one another, trust etc. cannot be measured and yet these are the things we value most and encourage one another to foster. At least this is how I would like to see and let me tell you I will be the first person to feel sad for not having these subjective qualities included in the standard.
R15	<ul style="list-style-type: none"> ▪ Throughout you use the term beneficiaries (which as it's part of the tag line is understandable) but I've always found this term a bit problematic as it can inappropriately exclude non-beneficiaries who may be equally in need of assistance and who agencies should also be accountable to. So for instance it's not just beneficiaries who should be able to use a complaints system or who should be informed about agency programmes. Standard six would then read 'the agency shall establish .. procedures that are accessible and safe for disaster affected populations.' ▪ With a lot of the standards the devil is in the detail and they naturally beg lots of questions about feasibility and resources. The bits about good practices and tools also sit rather oddly in the document at the moment. I wonder if what you need is to take out the bits on good practices and tools and make them part of a commentary document (about like Pictet's) which elaborates on all of the issues raised as well as pointing people in the direction of practice and tools.
R16	No Comments
R17	No Comments
R18	No Comments
R19	Generally speaking the standards look very good and as I indicated in the form would really add value to the accountability process. ACBAR is an NGO umbrella organisation with both national and international NGOs. I do doubt to which extend it would be possible for the national NGOs and also for some of the international NGOs. ACBAR has drafted a Afghan specific Code of conduct and it is mandatory for its membership to “sign up” to this CoC. The conditions for membership are much more straightforward than the HAP standards but it has been tough going and we will probably have to strike of some organisation as ACBAR members because of non-compliance. My fear is that it will be the “usual suspects” that will adhere to the HAP standards but that many won't for a wide variety of reasons, although on paper many will be genuinely enthousistic.
R20	No Comments
R21	Overall the HAP standard is a good initiative to improve the quality of services we provide to those in need.
R22	No Comments
R23	On the documents:

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	<ul style="list-style-type: none"> ▪ This version is much clear and better than the previous one, we appraise the effort of including all inputs and making it more clear and sharp. That is great!. ▪ There is a clear need to consider different/adapted benchmarks for agencies working with partners as we are not implementers we cannot commit at the same level; there is an issue about the boundaries of management control/influences. ▪ There was a suggestion about leaving means of verification open to the different agencies, on how they choose to measure the requirements <p>On HAP in general::</p> <ul style="list-style-type: none"> ▪ There was a feeling among our field-based staff that the whole initiative is quite “Top-Down”. That is quite worrying; all members should actively promote ownership of the initiative by our field staff and partners. ▪ Ensure coordination among different funding agencies (at lease HAP members and sister agencies-i.e. ACT members for CA) when we approach partners regarding accountability to beneficiaries, we are worry that we all come with different accountability plans and standards. ▪ There was also a discussion on why only Humanitarian and not development work. The general agreement was that we should initiate the process with the humanitarian people as pilot and then encourage development “people” to take similar steps. Anyway in, or our case CA humanitarian accountability plan will fit into the general accountability plan at corporate level.
R24	No Comments
R25	No Comments
R26	<ul style="list-style-type: none"> ▪ You must get all sorts of contradictory feedback from all sorts of different people – it must be a nightmare pulling it all together. ▪ As a member of the Editorial Steering Committee, I would certainly support you to make some of the tough choices of going with some of the ideas and leaving others behind. I expect that we’ll have to do this – it won’t be possible to keep all of the people involved happy. Personally, I think that HAP has a wonderful opportunity and role to play in being more rigorous in defining what best practice looks like than NGOs mostly achieve. For instance, the Red Cross Code is a masterpiece of compromise, which massively undermines its use as a tool for accountability. I’m sure you’ll come up with something much more hard-edged – and so much more useful – than this. ▪ Good luck with the next iteration and drafting. I’d be delighted to help further, if you’d find that useful. Please feel to run ideas past me. I’m looking forward to the meeting in December.
R27	I really hope that the HAP standards and certification can eventually have a standing and reputation both within and outside the humanitarian world. One way of assuring that is to link these standards closely with other well-known and recognised international organisational standards (like ISO).
R28	No Comments
R29	All the above standards should be fully implemented by each agency members. HAP-I will need to convince all HAP-I members especially from TOP level managers/leaders to put into practice with strong support and monitor the process. To make sure that it is implemented at all level, especially at field level.
R30	Contrary, I believe, to what is in the forward the standards are full of ‘shalls’ and no ‘shoulds’. My possibly pedantic comments aside I think the standards are useful and usable and looking far better than they were in previous versions. Well done.
R31	Overall, the HAP-I standards have provided a good guidance in formally setting up a pilot accountability framework in East Sri Lanka. Oxfam & partner staff also found the mango checklist useful at the field level to evaluate their a/cability on-the-spot.
R32	The language level is generally high, particularly in the Forward and Covenant. This will raise questions about accessibility. Who is the reading audience for this document? Are simpler versions planned, particularly for field level, but also for those for whom English (or whichever translation is being used) is not a strong language? This is mentioned from the point of view of Sphere experience. I would argue that the English in the Sphere handbook is plainer than that generally used here, but we still often receive feedback that the book is ‘too academic’ for many people, particularly at field level, and

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	<p>when English is not their first language.</p> <p>For inclusion in a glossary:</p> <ul style="list-style-type: none"> ▪ Covenant ▪ Benchmark of standard ▪ Hierarchy of principles ▪ Proxies (1.3, page 5) ▪ ‘Quality Management System’ ▪ Stakeholder map ▪ Capacity building/local capacity ▪ Staff ‘competence’ – specifying that this includes attitudes/values/approach to work? <p>The Accountability Principles are at the end – suggest these should be given more prominence. For those who have not been involved in the process of developing the standards, but who know something about HAP, the Principles are what they will recognise. As noted above (under comments on the Covenant), their place needs to be made clearer, and the link with the Covenant and ‘hierarchy of principles’ (ie apparently another set of principles) made more explicit.</p>
R33	No Comments
R34	<ul style="list-style-type: none"> ▪ We questioned why the Red Cross Code of Conduct isn’t included more often under the Good Practices section ▪ We wanted to clarify if any standards will relate to supporting/capacity building partners in outworking the Standard
R35	<ul style="list-style-type: none"> ▪ Comments in the C point: Standard’s requirements also are or are not affordable in terms of “institutional willing”, which is another kind of “resource”. ▪ One more reference for the standards 3 and 4 is the effort of the “Do no harm” project with their framework of “local capacities for peace”
R36	No comments
R37	
R38	
R39	
R40	