Accountability to Affected Populations in Pakistan: Interagency mission report

FAO, WFP and the gFSC, September / October 2012

Executive Summary

Rome based agencies FAO and WFP, along with the global Food Security Cluster, undertook an interagency mission to Pakistan in September and October, 2012, in order to support IASC activities on accountability to affected populations (AAP), investigate the current status of AAP amongst humanitarian agencies, with a particular focus on gender equality and protection programming, propose means to strengthen AAP at an interagency level, and to develop a model for an interagency level approach to AAP that could be applied in other situations and country programmes.

The planning team selected Pakistan because all three entities are active there and the humanitarian sector in Pakistan, both national and international, is one of the most active in the area of AAP, with many networks and activities already in place. This was felt to potentially provide a springboard from which current activities and networks could be built upon and supported further through the participation of the UN and clusters, allowing complex models of operation to potentially be developed more rapidly.

The team of three Rome-based representatives from the three entities spent two weeks in Pakistan, where they interviewed an extensive cross section of relevant agencies and stakeholders (see annexe for the list), including national and international NGOs, UN and Cluster representatives, the HC and donor representatives, soliciting their views on the accountability of humanitarian action, identifying examples of good practice amongst cluster agencies as well as the challenges faced. In addition, the team conducted field visits to interview communities and local staff, to Sindh Province and Khyber Pakhtunkhwa (KP), where a cross section of Food Security project sites were selected for the visits. In total, seven separate communities were visited and men and women were interviewed in separate focus group discussions each time, to ensure an understanding of women's and men's perspectives and to review the interaction between AAP work and gender equality.

Summary of Findings

The findings are grouped under the five Commitments on Accountability to Affected Populations (CAAP) endorsed by the IASC Principals in 2011, and the primary stakeholder groups.

Commitment 1: Leadership/governance

- Nearly all agencies that had well-developed accountability systems and mechanisms said that institutionalisation of AAP across service delivery could not have been achieved without strong and committed leadership on the issue.
- After a few years of global and local efforts, some agencies felt that AAP had become part of their organisation's culture.
- It was agreed that there is a general weakness in formal partnership agreements on AAP. There is a lack of sufficient trust and mutual respect between the various categories of

agencies, national and international NGOs and the UN system being discussed in particular.

- Systematic organisational approaches to ensuring the implementation of AAP commitments, including AAP indicators in proposals and reports, specific resourcing from AAP initiatives, capacity building and accountability frameworks were highlighted as effective in embedding AAP in practice over time.

Commitment 2: Transparency

- Transparency, information provision and two-way communication appeared to be, together with commitment 5 on M&E, the least well developed area of AAP on the whole, despite some good practice examples. Lack of information was a strong theme emerging from community consultations.
- In some instances communication methods used were ineffective in the face of very low literacy levels. Some agencies demonstrated good practice through the use of multiple methods concurrently to address the complexity of the abilities and needs within communities.
- There was some prioritization of communication within the UN and Cluster systems – with the advent of the inter-cluster communication group (led by OCHA and IOM), and associated message broadcasting on assistance.
- Inconsistency of information provision, particularly from the international agencies was highlighted by communities.
- Community members reported that their lack of knowledge often centred on the following omissions: explaining why they were selected for assistance over others, how to contact people related to the project, how long a project would last, what kind of follow up would occur, and what agency had provided them with assistance.

Commitment 3: Feedback and Complaints

- Complaints seem to be the area of accountability that the humanitarian community has devoted the most efforts to in Pakistan, with some very impressive results to be found across UN, intergovernmental agencies, INGOs and NNGOs alike.
- Agencies reported noticing improvements in their programming as a result of adjustments made in response to complaints, and that after mechanisms had been running for a while, the numbers of spurious or malicious complaints dropped off.
- Many communities specifically requested greater monitoring staff presence when asked how to strengthen accountability and complaint systems.
- The diversity across the country in terms of social and gender norms means that in some regions hotlines are likely to work more effectively than in others. In some areas, the lack of access for women to telephones, along with a level of literacy that makes even reading and dialling numbers problematic, means that women in particular are restricted in their ability to utilise the mechanisms. Overall, women appear vastly underrepresented as complainants.
- There is a strong reluctance across the sector to establish joint complaints mechanisms, and this coupled with varying approaches to complaints referrals between agencies can mean that the system being created may be confusing in some areas where there are

multiple mechanisms, and that some complaints may be falling into the space between agencies.

Commitment 4: Participation

- Participatory systems described and observed demonstrated a widespread and positive approach and intent, and indicated a significant degree of commitment on the part of the agencies to attempt to ensure participation. The mission team did wonder, however, to what extent the systems for establishing participation, which seemed to be applied quite uniformly across many agencies, were applied with context specific analysis to ensure community differences and nuances are taken into account.
- Many agencies described means by which they routinely ensure the participation of both women and men in programmes. It seemed that there is far less attention paid to the inclusion of other special interest or needs groups, such as the aged, people living with disabilities, or minority religions, so that these groups have much less formalised access to participatory processes. The level of genuine participation by women was still widely questioned.
- Only a small number of agencies described ensuring participation in determining criteria for receipt of assistance and for selecting recipients. This trend appeared confirmed by community groups, and yet selection processes often tend to trigger peaks in complaints.

Commitment 5: Design, Monitoring and Evaluation

- Involvement of communities in design, monitoring and evaluation of projects seemed to be significantly impacted upon by the short nature of many projects, and the consequent reluctance of agencies to take the time involved along with the inability of agencies to build longer term relationships with communities.
- Community groups spoken to highlighted the frequent changeover of staff, which affected their level of trust and preparedness to raise concerns.
- Some of the larger INGO and local NGOs were able to engage with local women and men over longer periods of time when they followed up short emergency related programmes with more long-term development oriented programmes. This approach significantly contributed to building trust, the foundation for participatory design, monitoring and evaluation.
- Women's groups noted that they were consulted at needs assessment phase, but not afterwards, even though agencies continued to consult men.
- Good practice examples included hiring field supervisors from the communities to both collect feedback and conduct monitoring, or distributing accountability officers amongst communities for feedback, communication and monitoring that standards are met.

Stakeholders

- Lack of control and regulation, and gaps in communication and understanding between the humanitarian community and the government, mean that the national NGO marketplace is complex and confusing, and concerns regarding some national NGOs can result in all of them being affected by a generalised lack of trust and confidence.

- There are many NNGOs working actively on AAP, with a large body of experience and expertise.
- Along with the experienced NNGOs, there is a significant body of knowledge and experience amongst INGOs on AAP, in particular amongst agencies certified against the HAP Standard and the ECB member agencies that should be exploited, developed and shared more broadly across the sector. These agencies could take a leadership role.
- Varying degrees of AAP activities, formal and informal, occur across UN agencies, and a number of good practice examples were elicited.
- Without a cohesive accountability framework or clear guidance as to the breadth of expectation, individual UN agencies were in general found to have strengths in one or other aspect of AAP, but none seemed very far along in an integrated or holistic approach to AAP.
- Accountability has not made it to the agenda at the cluster level, despite the number of cluster member agencies working on it.
- Donors have an important role to play that is not currently being exploited.
- The model of splitting funding between relief and development has a negative impact on the quality of programmes and the relationships developed between agencies and communities.
- Despite the extensive and positive work being done on AAP across the sector, in particular by NGOs, there is still a very long way to go in addressing marginalisation in Pakistani social systems and the disadvantage this continues to place on women and minority sections of the communities in the receipt of assistance.
- Women's groups asked for more women's empowerment projects and to be consulted more. Women appeared to be looking to humanitarian agencies who work with them to assist them with change.

Summary of Recommendations
- Strategies for tackling gender inequality and marginalisation of minority and special needs groups need to be stepped up, as AAP mechanisms risk exacerbating social inequalities if they further exclude marginalised groups.
- National NGOs have a leadership role in developing a system for self-regulation and / or quality control amongst the NGO sector, perhaps drawing on models such as the DEC Accountability Framework yearly assessment.
- It is timely to explore how the expertise of the INGOs and NNGOs on AAP can be capitalised upon on a wider scale, including building capacity of the UN system.
- The Accountability Working and Learning Group is an effective peer learning forum that could be utilised more broadly.
- Advocacy on AAP is needed from INGOs, to ensure AAP gets on the agenda at a senior level.
- In order to scale up the impact of the already well-established work on AAP, and to improve its coverage and relevance to all of the five commitments on AAP, the UN system has a number of critical roles to play. In general:
  - Ensure strong leadership regarding the commitments on AAP, both internally and across the sector
  - Modelling commitment and good practice at all levels

- o Participate in ensuring that adequate resources for AAP are dedicated
  - o Lead on a cohesive, interagency approach on AAP
- Roles particular to OCHA could include:
  - o Spearhead the leadership and promotion of AAP
  - o Lead on development and incorporation of realistic AAP indicators into assessment and reporting processes
  - o Facilitate a more coordinated and strategic approach to capacity building across the sector, utilising local expertise and knowledge
  - o Lead on advocacy and awareness raising with the Government of Pakistan
- Roles related to the clusters:
  - o Ensure that AAP is on the agenda through coordination mechanisms
  - o Build AAP into monitoring and reporting mechanisms
  - o Promote the fostering of more equal partnering relationships through an AAP framework
  - o Promote a stronger profile for quality standards.
- Numerous donors have a strong track record in promoting and supporting AAP, and this should be developed further locally as a partnership between donors and the humanitarian agencies.
- Donors could promote AAP indicators and insist on AAP in reporting, including building AAP into contractual obligations
- The sector should work with donors on redressing the impact on quality of service provision created by the split between emergency and development funding.
- A strategy needs to be developed for inclusion of the government in scaled up AAP initiatives.

Accountability to Affected Populations in Pakistan: Detailed mission report

Background

Rome-based agencies FAO and WFP took an active role in the establishment of the IASC Sub Group on Accountability to Affected Populations (AAP) in 2010 (now the Task Force on AAP) and commenced respective AAP projects around late 2011. Discussions with the global Food Security Cluster (gFSC) on collaboration at the cluster level led to the idea of an interagency mission. The aims of the mission included to:

- Support the broader IASC processes by assisting the Task Force on AAP in testing the draft IASC Operational Framework
- Map out existing individual agency and interagency initiatives
- Identify overall strengths, gaps and priorities in existing humanitarian activities in Pakistan with respect to AAP
- Propose means to strengthen the accountability of the response, and in particular through scaling up interagency activities.
- Develop a model for the support and promotion of AAP at the cluster level

The planning team selected Pakistan for the following reasons:

- The FSC is active in Pakistan as are both WFP and FAO
- The other IASC Pilots were proposed to take place in various countries in Africa, and therefore it was felt that conducting this mission in a different region would allow more global considerations to emerge
- Pakistan is one of the most active countries in the area of AAP, with existing networks and activities already in place, in particular among and between international and national NGOs. This was felt to potentially provide a springboard from which current activities and networks could be built upon and supported further through the participation of the UN and clusters, allowing arrival at complex models of operation potentially more rapidly.
- The WFP Pakistan programme is one of the countries active in their current protection and accountability project.

Methods employed by the mission

The team, comprising a staff member from each of the three entities, and including expertise in the areas of AAP, gender and protection, engaged in the following activities in the course of the mission:

- Conducted briefings and orientation on AAP with in-country stakeholders
- Interviewed a representative cross section of relevant agencies and stakeholders (see annexe for the list), including national and international NGOs, UN and Cluster representatives, the HC and donor representatives, soliciting their views on the accountability of humanitarian action, identifying examples of good practice amongst cluster agencies as well as the challenges faced.
- Conducted community visits in Sindh and Khyber Pakhtunkhwa (KP) to groups being served by cluster member agencies for feedback on the accountability of services.

- Engaged with existing networks across the UN and NGO sectors.
- Organised a stakeholder roundtable discussion to present findings.

Groups with whom the mission team intended to speak, but were unable to meet, included government representatives in Islamabad and civil society representatives, including the Human Rights Commission of Pakistan and Transparency International.

The team was extensively and ably assisted in logistics and in putting together an extremely complex programme over the two weeks by Islamabad based colleagues from the Food Security Cluster / FAO and WFP, along with an NGO representative from Church World Service Pakistan / Afghanistan, to whom the team is extremely grateful.

Detailed Overview of Findings

Findings are grouped under headings relating to the five commitments on AAP and to separate stakeholder groups interviewed in the course of the mission.

1. The 5 Commitments on AAP

Commitment 1: Leadership/Governance
> *"Demonstrate their commitment to accountability to affected populations by ensuring feedback and accountability mechanisms are integrated into country strategies, programme proposals, monitoring and evaluations, recruitment, staff inductions, trainings and performance management, partnership agreements, and highlighted in reporting."*

Leadership was one of the most dominant themes to emerge from consultations. Nearly all agencies that had sophisticated, well-functioning accountability systems and mechanisms, reported that institutionalisation of AAP across service delivery could not have been achieved without strong and committed leadership on the issue. Related to this was the frequent highlighting of AAP becoming part of an organisation's culture, so that it had become an expected part of the way the organisation operates and defines itself through policy and practice.

Partnership agreements and partnerships in general were an area where a number of issues emerged, and agencies admitted that there is a general weakness on AAP in formal partnership agreements. It was frequently reported that there is a lack of sufficient trust and mutual respect between the various categories of agencies; national and international NGOs and the UN system being discussed in particular. Some of these issues are discussed further under the category groupings.

Some agencies have taken up the challenge of providing capacity building across the sector, and in particular to national NGO partners of international agencies. One agency was proud to announce that they had trained in excess of 2,500 national counterparts, in addition to having provided follow up support to many. This agency noted, however, that mass general

trainings will make less impact than in depth, skills based training, and overall, efforts have less impact in the absence of organisational leadership, support and planning.

A number of agencies talked of the importance of an accountability framework and implementation plan for ensuring that commitments are met and continuous improvement occurred. It was noted by one agency that dedicated support, monitoring from headquarters, making AAP everyone's responsibility and having to provide evidence against commitments have all made a big difference to embedding AAP into everyday practice.

Experienced agencies agreed that resources are needed for AAP to occur effectively and to be embedded into practice. One of the INGOs noted that they proactively include AAP indicators in proposals so that they have to be reported back on, thus keeping it on the work plans of staff.

Commitment 2: Transparency
> *"Provide accessible and timely information to affected populations on organizational procedures, structures and processes that affect them to ensure that they can make informed decisions and choices, and facilitate a dialogue between an organisation and its affected populations over information provision."*

Transparency, information provision and two-way communication appeared to be one of the least well developed areas of AAP, along with design, monitoring and evaluation, despite a few good examples. Lack of information was a strong theme emerging from community consultations. Information was especially limited for women, and issues of inequality of access to information sources, including telephones, was an area that stood out as insufficiently addressed. Most of the communities visited highlighted significant gaps in their understanding of agencies, projects, selection criteria, how to contact agencies, or how to access further information. One agency noted that complaints regarding missing information constitute the largest category of complaints they receive. There were some examples, however, of agencies making efforts to provide a diverse range of information, but this was inconsistent and it is clearly not addressed in as consistent manner as some aspects of accountability, as described below.

Internews reported undertaking a range of research and projects that could prove invaluable to humanitarian agencies regarding context and culturally appropriate communication methods, and strategies to bridge the divide between NGOs and local media. They also use communications methods with an aim of conflict resolution between communities, NGOs and the government, highlighting the broad reach of communications when applied well. According to Internews, understanding of the potential for communications in the provision of aid is still very limited, and most use of media such as radio does not sufficiently exploit its potential, for example for two way communication and feedback. The immense resource of specialist knowledge available to the humanitarian community seems at the moment to be underutilised, and both Internews and many other agencies agreed that most of the sector was unaware of or had limited knowledge of its potential, aside from a small handful of agencies such as IOM.

A number of agencies did have wider communication strategies that included a specific focus on communicating with affected communities, and the mission team noted some prioritization of communication within the UN and Cluster systems, in particular the inter-cluster communication group led by OCHA and IOM, and associated message broadcasting on assistance available.

The team saw examples of information provision in communities that would have been good practice in a literate community, however in some instances these communication methods were extremely limited in their value given the very low literacy rates. Examples of good practice that the team saw or heard about included agencies' efforts to communicate through a variety of methods at once in order to increase the spread, for example using verbal communication, "broad based community meetings", pamphlets, whiteboards and the media. One agency mentioned working on the development of multimedia resources for illiterate communities, and a few highlighted their use of radio broadcasts. Others mentioned the need for providing continuously updated information, and for utilizing specific avenues to reach particular populations, such as mosques, child friendly centres, the Women's Desks or gender and Child Cell (at PDMA level), and disabled or older people associations.

Commitment 3: Feedback and Complaints
> *"Actively seek the views of affected populations to improve policy and practice in programming, ensuring that feedback and complaints mechanisms are streamlined, appropriate and robust enough to deal with (communicate, receive, process, respond to and learn from) complaints about breaches in policy and stakeholder dissatisfaction"*

In contrast to transparency above, complaints seem to be the area of accountability that the humanitarian community has devoted the most efforts to in Pakistan, with some very impressive results to be found across UN, intergovernmental agencies, INGOs and NNGOs alike. It seems that the majority of the more sophisticated and well-resourced mechanisms were established as a result of the 2010 floods, and therefore most have been in operation around two years. Most mechanisms involve a call centre, relying predominantly on the use of telephones, however a number of agencies also described alternative means of entry for complaints, such as help desks, protection officers, door to door visits, community complaints committees and complaints boxes. Some systems were developed and resourced to the extent that they incorporated fully documented investigation processes, and maintained voice recordings of complaints and statements.

It was noted that these mechanisms are much less utilised by communities to provide feedback as such, and that people were generally more motivated to use them when they had an actual complaint. Other types of feedback tend to be gained through participatory methods discussed below. In terms of the "feedback loop", one agency found through an After Action Review of their 2010 and 2011 flood responses that they needed to ensure that feedback provided to communities was much stronger.

Agencies reported noticing improvements in their programming arising from their response to complaints, and that after mechanisms had been running for a while, the numbers of spurious or malicious complaints dropped off. For example, one agency reported that more women were now participating in "Food for Work" activities after the work component had been adjusted due to feedback, making it more appropriate for women. Another agency representative commented that, "complaint and feedback mechanisms offer us 100% monitoring; we could only ever do sample monitoring (before)".

With so many mechanisms in operation throughout the country, it was notable that they don't interact and that very few are joint, with most peer agencies agreeing that they were unable to resolve the issue of confidentiality. An alliance of INGOs called the Pakistan Emergency Food Security Alliance (PEFSA) have ECHO funding to work collaboratively on accountability, with very strong outcomes including on complaints handling. They also confirmed that the issue of joining mechanisms to a single entry point or referrals between them has not yet been resolved. Some agencies were more optimistic than others regarding the effectiveness of complaints referral between agencies, meaning that unless community members were completely clear as to who "owned" a complaint, it may not be referred or responded to if they complained to the wrong agency.

In the situation of partner agencies, some examples were given of different means to monitor and track complaints and to ensure that responses occurred. The issue of transparency between agencies with a financial relationship seemed problematic for some, with agencies not always sure that complaints aren't being hidden from them, or concerned that donors want access to confidential information.

Of the communities visited, many said that they were unaware of complaints mechanisms and that they would not feel confident to complain for fear losing access to assistance. In particular, minority groups noted that they would be unlikely to complain if they had a problem and literacy was cited as one reason why. One women's group said they had been told they could complain, however they did not see the same workers again and didn't feel comfortable to make a complaint with people they didn't know. Many communities when asked how to strengthen accountability and complaint systems specifically requested greater monitoring staff presence.

Because many of the organisations were at a relatively advanced stage of development on complaints handling, a number of particular concerns and questions were able to emerge through discussion that the team felt were timely to address in the interests of broader learning:
- Once well established, is there a risk of systems becoming mechanistic and losing their connection and relevance to local communities? The variance across the country in terms of social and gender norms, for example, appears to mean that in some regions, hotline approaches are likely to work much more effectively than in others. In some areas, for example, lack of access for women to telephones, coupled with a level of literacy that makes even reading and dialling numbers problematic,

means that reliance on hotlines alone could exacerbate the marginalisation of women.

- Overall, women appear vastly underrepresented as complainants. One agency said that no more than 10 per cent of their callers are women, with an unrecorded number of men calling on behalf of women. In many areas, it was explained, women would feel unable to call if they didn't know whether a man or a woman would be answering at the other end. This highlights a clear deficit in these mechanisms in the area of capacity to capture sensitive complaints and in accessibility for women, both of which are of concern.

- Given the reluctance of most agencies to establish joint mechanisms in areas where numerous agencies operate, the impact of a proliferation of hotline numbers on the local population should be analysed, including the level of potential confusion and how difficult it is for communities to determine who is responsible for what problem. Pairing this with the gaps described above on information provision and transparency, and one could postulate that communities may well require more information about the mechanisms to increase their effectiveness.

- Minimum level of resourcing required for effectiveness and sustainability. Some agencies had the resources for toll free numbers, whereas others required that their complainants pay the expense of calling on mobile phones. Some agencies had a call centre with multiple language capability, along with the capacity to up- and down-scale staff complement depending on current emergencies and demand, while others had one sole staff member answering calls nationally on top of an additional workload. The interaction between resources, management support, outcomes and standing and trust of the mechanisms amongst target communities should be explored further.

The mission team were encouraged to find that DfID was about to embark on a research project regarding UK funded complaints mechanisms in country at the time of the mission, and believe there is strong potential for all mechanisms to benefit from research at this point in time. Overall, agencies reported being very satisfied with the outcomes of setting up their mechanisms and one commented that their mechanism had become such an integral part of the way they work, that they wouldn't consider operating without one.

Commitment 4: Participation
> *Enable affected populations to play an active role in the decision-making processes that affect them through the establishment of clear guidelines and practices to engage them appropriately and ensure that the most marginalised and affected are represented and have influence.*

Many agencies described routinely applied means by which they ensure the participation of both women and men in programmes. Most agencies seemed to apply the same or similar model, which is adjusted depending upon the region and the strictness of gender separation, whereby male and female representatives either stay separate or meet together. These models concentrate on attempting to ensure the participation of women, but it seemed that any other special interest or needs groups, such as the aged, people living with disabilities,

or minority religions, have far less formalised access to participatory processes, and the level of genuine participation of women was still questioned by many. For example, in one instance of response to the 2010 floods in the initial phase women were consulted about their needs. Female project staff were brought into the communities to identify the needs of women but after that initial contact, the women were never consulted again.

The commonly used systems rely on women's and men's groups electing representatives of high standing. In most cases amongst the community groups visited where these systems were in operation, people seemed generally satisfied with the system, however it was not clear if methods were in place to ensure that the power associated with being a representative was not abused, or did not prevent community members from challenging them. For example, it was noted quite often in consultations with men's groups that men not in positions of power, either as representatives or members of local NGOs, seemed far less likely to speak up, or to be given the space or opportunity to express an opinion, and the information provided to the mission team member conducting interviews seemed more likely to be controlled.

On the other hand, in some of the women's groups spoken to, even in the presence of the female community representative, the women seemed more likely to speak up to the interviewers. When asked what they would do differently if they were in charge of the projects, one group replied that they would establish more women's empowerment programmes, whilst another group stated that they would ensure that women are consulted more often.

A few variations on the participatory model did emerge. One UN agency described introducing a new structure where there were no chair positions on community committees; rather coordinators were appointed who were required to invest a lot of time into the role. This aimed to deter people seeking the role merely for status. A national NGO routinely establishes community based quality management committees that have a role in addressing complaints, setting selection criteria, applying those criteria and monitoring the quality of delivery.

Only a small number of agencies specified that they ensured community participation in determining criteria for receipt of assistance and for selecting recipients. This trend appeared confirmed by the community groups spoken to. It was also noted, however, that complaints received tended to spike whenever a selection and targeting process was ongoing.

The conformity with which many participatory processes are established and run, raised some reflections. While they certainly present as quite robust and reliable systems, the question remains as to how tailored and responsive they are to meet individual community needs and differences. If the majority of agencies are running the same kind of system, it is unclear how adaptable these systems might be over time, or whether they may continue to be applied rigidly, regardless of community changes. That said, the systems described

certainly demonstrated a positive approach and intent, and indicated a significant degree of commitment on the part of the agencies implementing projects with the communities there.

Commitment 5: Design, Monitoring and Evaluation

Design, monitor and evaluate the goals and objectives of programmes with the involvement of affected populations, feeding learning back into the organisation on an ongoing basis and reporting on the results of the process

Involvement of communities in design, monitoring and evaluation of projects seemed to be significantly impacted upon by the short nature of many projects, and the consequent reluctance of agencies to take the time involved along with the inability of agencies to build longer term relationships with communities. As a result, this area was also felt to be one of the weakest in terms of robust and consistent practice. Community groups spoken to highlighted the frequent changeover of staff, which affected their level of trust and preparedness to raise concerns. By contrast, when the larger INGO and NNGOs were able to engage with local women and men over longer periods of time through following up short emergency related programmes with more long-term development oriented programmes, this approach significantly contributed to building trust, the foundation for participatory design, monitoring and evaluation.

Reflecting upon the 2010 floods response, a women's group in KP said that some of them were consulted at the needs assessment phase, however after that they were aware of only men being approached by agencies, which they found very frustrating. Many communities spoken could report being involved in some aspect of project design, but the degree was inconsistent and, as noted above, very few were involved in determining selection criteria for the receipt of assistance.

Some good practice examples were found across UN agencies, INGOs and NNGOs of involving communities in design, monitoring and evaluation, sometimes by consulting them and sometimes by having them participate in conducting the processes. One agency actually hires field supervisors from the communities they are working with to both collect feedback and conduct monitoring, while another described a similar approach whereby accountability officers are distributed amongst communities for feedback, communication and monitoring that standards are met. Another agency talked about using participatory processes under a protection approach through each stage of the project cycle to ensure safe distribution of aid.

2. Stakeholder groups

2.1. National NGOs

There is a very large number of national NGOs in Pakistan, and they seem to fall into a number of loose categories. There are NGOs that have been working in humanitarian relief for some years, and who are well established and reasonably organised, in particular through the National Humanitarian Network (NHN), a peak body for national agencies

exclusively. There are a number of agencies who were working in development until around the time of the 2010 floods, and who then took on emergency work with less experience, due to geographical imperatives. These agencies are now more experienced and have received considerable technical backstopping from their international and more experienced national partners. There are two other groups that cause some concern amongst the national and international communities; NGOs established without experience or clear humanitarian intent, who seem to be taking advantage of the ease with which an agency can be registered and then apply for funding, and agencies whose primary goals and agenda are not consistent with humanitarian principles, but who are able to access communities and areas that may be less accessible to others.

Lack of control and regulation, and gaps in communication and understanding between the humanitarian community and the government, mean that the national NGO marketplace is complex and confusing, and it seems that concerns regarding some of these groups can result in all national NGOs suffering from a generalised lack of trust and confidence. When an incidence of corruption, for example, is uncovered in relation to a national NGO, all national agencies are to some extent stigmatised by the controversy. This is despite the fact that a number of national NGOs are doing excellent work in AAP, to the extent that international NGOs admitted in a meeting to sometimes being embarrassed by how well they do it.

Many conversations were held as to how this problem could be addressed and how some level of quality control could be instituted in an environment where there are not vast resources for complex or costly schemes. All agencies, national and international, spoken to on this subject agreed that certification for all national agencies against the HAP (Humanitarian Accountability Partnership) Standard in Accountability and Quality Management, for example, was at this stage beyond the means and capacity of most, and that demonstrated capacity to deliver and improve were more important, at least initially, to provide a base upon which agencies can work with their partners to develop further. A simplified version along the lines of the Disasters Emergency Committee (DEC) framework, the INGO Charter, or the AusAID accreditation scheme might be considered as a starting point.

In general, the international agencies did not tend to propose the national agencies themselves taking a lead in finding a solution, however they may well be the most vital key to addressing this issue. For example, the mission team met with the executive of the National Humanitarian Network (NHN) who had themselves been exploring means for at least increased quality control amongst the membership of their network through developing membership criteria for the network, with some sort of assessment regarding accountability and integrity. The national agencies represented on the executive are all or mostly members of HAP, and the chair agency of the network is certified against the HAP Standard in Accountability and Quality Management, indicating that there exists already a degree of awareness and commitment to AAP amongst national agencies that could be capitalised upon. Whether it is through this network, another if it exists, or through a new national body, the NHN Executive are supported in their suggestion to develop a

collaborative approach that ensures strong representation of national agencies, and of women working in these agencies, to develop a system owned across the sector. The goodwill engendered by supporting the national system of NGOs to develop a form of self-regulation might go a long way to improve trust and confidence in the system.

2.2. International NGOs

Many of the international NGOs operating in Pakistan hold a significant amount of expertise and experience in AAP. In particular, the Emergency Capacity Building (ECB) member agencies, along with agencies certified against the HAP Standard, and to a slightly lesser extent, other HAP member agencies, can be relied upon to have devoted considerable resources to the establishment of sophisticated accountability systems covering a number of the commitment areas. With the exception of CWS-P/A, who run support and services sector wide, most agencies acknowledged that they concentrate their efforts internally, amongst their own partner agencies, and amongst small consortia or networks of which some of them are members. Noting that this body of expertise has been growing over a number of years, with many starting to grapple with the issue after the 2005 earthquake, but with most placing the greatest effort since the 2010 floods, it seems timely to explore how this expertise can be capitalised upon on a wider scale, and most agencies seemed willing to consider this.

The Accountability Working and Learning Group constitutes a group of international and national NGOs who meet as peers with a shared interest in accountability. Some debate has occurred within the group as to the level at which it is pitched; whether it should operate as a peer learning forum or act as an advocacy body. From a brief engagement with the group, this division appears to stem from the differing roles of participants in the group, and it was our understanding that the majority of the group leant towards a peer learning role. Those more senior members of the group, for whom advocacy would be the most natural strategy, perhaps need to find an alternative means to fill that gap, as it is still certainly an unmet need. Two INGO networks, the Pakistan Humanitarian Forum, and the Muslim INGO Forum were suggested as bodies to address this need. The peer learning aspect of the AWLG did appear fruitful, with good practice in regard to complaint mechanisms in particular being shared within the group. A wider group of agencies could benefit from engaging with this group in order to utilise and build upon the existing level of practice and knowledge.

2.3. The UN System

Varying degrees of AAP activities, formal and informal, occur across UN agencies, and a number of good practice examples described here were gained from them. Without a cohesive accountability framework or clear guidance as to the breadth of expectation, individual agencies were in general found to have strengths in one or other aspect of AAP, for example, a well developed national complaints mechanism, advanced practice in participatory approaches to selection criteria and targeting, innovative practices in participatory systems, but none seemed very far along in an integrated or holistic approach to AAP. Accountability has not made it to the agenda at the cluster level, despite the number

of cluster member agencies working on it, again indicating the tendency of agencies to work internally and not yet at an interagency level.

In order to scale up the impact of the already well-established work on AAP, and to improve its coverage and relevance to all of the five commitments on AAP, the UN system has a number of critical roles to play. There is no need to start afresh, or to cut across what is being done, but there is plenty of scope for collaboration and for the UN as a whole to learn from its experienced partners regarding what works well and where the challenges lie. Many suggestions and comments were shared by UN and NGO workers alike as to roles that the UN could play, either through the clusters, as each agency, or roles specifically suited to OCHA:

UN in general
- Accepting the common wisdom regarding successful integration of AAP into organisational and systemic processes, leadership commitment is critical. People with leadership roles at all levels of the UN system need access to information and guidance as to their role in promoting AAP and minimum standards as expected practice.
- Given the commitment of the IASC member agencies on AAP, all relevant agencies have a role to play in modelling this commitment. As one person said, "don't ask your partners to do what you yourself are not doing". Another pointed out that the when UN agencies do not reinforce requirements of their partners with respect to quality and accountability, this can cause tension for those agencies trying to promote good practice and include AAP in partnership agreements, particularly when they share the same partners.
- An acknowledgement is needed all the way down through financial agreements between agencies that AAP requires dedicated resources.
- Agencies and UN workers alike would like the UN to take a cohesive and holistic approach to AAP, and some look to OCHA to facilitate that. Along similar lines, it was also suggested that some kind of common accountability framework be adopted, for example a contextualised version of the IASC Operational Framework when it is finalised, and then promoted through capacity building efforts.

OCHA
- It was suggested that OCHA could take a strong leadership role on promoting AAP, in a similar way that they are perceived as leading strongly on DRR.
- Achievable and realistic AAP indicators should be built into assessment and reporting processes, including into the MIRA
- Capacity building efforts currently in place focus more towards field level implementation. A more strategic and systemic coverage of capacity building approaches is needed at all levels of the system, including towards leaders as noted above, to establish a common language and understanding. In addition to formal capacity building approaches, informal knowledge sharing and awareness raising could be undertaken, and mentoring, coaching and skill exchanges. It seemed that many in the sector would like to see OCHA's leadership in this, to ensure utilisation

of local expertise but also to ensure that agencies with skills in AAP are not overburdened by peer demands for assistance.

- The role of the government was raised throughout the mission, and unfortunately it was not possible to meet with appropriate representatives. Advocacy to government was raised as a role for OCHA.

Clusters
- AAP should be on the agenda through coordination mechanisms and meetings, and education is needed to establish an understanding of what that would mean, and how it can be strengthened at an interagency level.
- Monitoring and reporting on progress on AAP could be built in through existing systems such as those being established through clusters
- AAP would be an excellent platform through which the philosophical intent of the cluster system to view partnerships in more equal terms could be more fully realised.
- It was commented that of late, there appears to be less of a priority on promoting standards through the clusters, than in managing donor and government relations. Colleagues would like to see a much stronger profile for standards through the clusters.

2.4. Donors

Donors have an important role to play that is not currently being exploited. Numerous donors have demonstrated commitment and interest in the area of AAP through their global funding priorities, however country level dialogue does not yet occur. Interventions such as the integration of AAP indicators in funding proposals and reporting could be an effective means to bring AAP to a higher priority, as would some level of coordination between donors. Agencies commented that contractual obligations regarding AAP would provide a great push in some areas, and the DEC's annual assessment against its accountability framework was quoted as a good example that has made a difference. Donor involvement in the area of partner selection was also suggested, with regard to ensuring that AAP commitment and capacity is assessed and supported.

An additional area of potential impact, that is not unique to Pakistan, is the need for the sector to work with donors on redressing the impact on quality of service provision created by the split between emergency and development funding. This is an issue that is raised often across the sector, but could perhaps be progressed by a heightened awareness of the impact this division continues to have on communities affected by disaster and conflict. Short term and disconnected projects and lack of relationship building and therefore trust are just a couple of the areas raised throughout discussions that relate directly to the current funding models.

2.5. Affected Communities

Further to points raised on this subject above, it is worth reiterating that despite the extensive and positive work being done on AAP across the NGO sector, and amongst a number of other agencies, such as WFP, IOM and the Red Crescent movement, for example, there is still a very long way to go in addressing marginalisation in Pakistani social systems, and the disadvantage this continues to place on women and minority sections of the communities in the receipt of assistance. It is insufficient for the humanitarian sector to only partially address these issues, as we risk exacerbating marginalisation further by establishing systems that ignore it, or place greater advantage in the hands of those with more power. When the least educated women from the most conservative areas recalled with raised emotions that they were rarely if ever consulted post needs assessment, that they had no means to register complaints, and that those whose husbands were unable to speak to relief workers conducting household assessments missed out entirely on receiving assistance, we were led to understand that much slips through the gaps. Another women's group commented that in their view, not many agencies actually work with women, and although the agency they had worked with did a door to door assessment, they have seen other agencies going to the male leaders only for information. As noted earlier, others emphasised that they don't have the right to speak in front of men, and that they would like more opportunities. While humanitarian workers and their agencies struggle with the very challenging and thorny issue of gender inequality and perceptions of social norms in Pakistan, the women themselves do not appear to be in agreement with the status quo, and seem to be looking to the agencies who work with them to help things change.

2.5.1. Information provision and transparency

Inconsistency of information provision was in evidence throughout community consultations. Some communities reported regular visits and information provision by agencies, others highlighted that women knew far less than men, and reported limited or delayed information, at times even despite access to mobile phones, radios and television.

Communities noted receiving more information from, and knowing a lot more about, the national NGOs working with them, while not knowing much if anything at all about the international agencies that they partnered with. It was highlighted by some agencies that there is an inherent risk in this lack of broader understanding of the system, as there also exist other agencies willing to take the credit for assistance they may not have provided, and who contribute to misinformation about the motives of foreign agencies and institutional donors.

A number of groups said that they had active community members upon whom they relied to communicate with the outside world, and therefore rely upon them to report back by word of mouth. There were recurrent requests for agencies to provide continuous and updated information.

As noted above, a number of communities did receive written information that they were then unable to use due to illiteracy. Kinds of information community members reported not knowing included why they were selected for assistance over others, how to contact people

related to the project, how long a project would last, what kind of follow up would occur, and what agency had provided them with assistance.

2.5.2. Feedback and complaints

The communities visited in Sindh tended not to be aware of any formal complaints mechanisms related to the projects they were receiving assistance through. People were not clear as to who would handle what kind of complaint and a number of communities expressed general concerns as to needs that weren't being met, but all made very different suggestions as to where they could go, some indicating "nowhere". Some communities, including minority groups, were concerned they would lose assistance if they complained, and others said they relied upon internal structures, such as elders or local negotiators, for resolving problems. One community noted that regular monitoring visits by the NGO provided them with an opportunity to lodge complaints if necessary.

A number of groups in KP pointed to door to door visits from the agencies working with them as an effective means to learn about their needs and to request feedback, provided that women were equally accessed. Women from one group noted that the NGO regularly asked if they had problems, which they seemed to appreciate. On the other hand, a woman from a different group said that she had been told to complain to her father as she could not access the agency workers directly. Another women from the same group told of a complaint that her husband had lodged in a complaints box. He had required assistance to write it, but they were pleased that their complaint brought a response, as it was in reference to them having being missed out altogether on assistance.

2.5.3. Participation, Design, M&E

Communities in Sindh tended to either be invited to participate in determining selection criteria or in the design of projects, but not both, with participation in the design more likely, whereas some of the groups in KP were involved in selection criteria and targeting through committees. Communities expressed appreciation for when their suggestions had been adopted by agencies and projects adjusted as a result of feedback. There were requests, however, that agencies strive to address the community's priority needs rather than deliver services convenient to the sector of the particular agencies working in their village. A number of examples were given where people received aid they either felt they didn't need, or didn't need as much as something more basic, such as shelter.

2.6 Stakeholders and Other Actors

Although not exhaustive as a list of additional relevant actors, the following three stakeholders were missed during the mission for various reasons, but should be noted nonetheless.

The Government of Pakistan

Various Government accountability initiatives were discussed by agencies. A recurring theme was the mixed capacity across differing levels of Government structures. Further review, with an aim to identify best entry points and what support could potentially be offered, should ideally take place.

Transparency International Pakistan
Transparency International Pakistan operates a hotline on behalf of USAID OIG. The organisation refers complaints to responsible agencies where arrangements have been made for such referral.

The Human Rights Commission of Pakistan
The Human Rights Commission of Pakistan managed 'Information and Complaint Handling Centres' in four Districts post the 2010 floods and received some 18,000 complaints in a 12 month period. Their experience, particularly in respect to sharing and referring complaints to relevant agencies and line departments should be examined in detail.

Annexe 1

Stakeholders consulted with in the course of the mission

International NGOS
Church World Service- Pakistan/Afghanistan
Save the Children
Oxfam GB
Oxfam Novib
Care Pakistan
Mercy Corps
Catholic Relief Services
Muslim Aid
Islamic Relief
World Vision
Concern Worldwide
CIDA
HelpAge
REDR
ACTED
IRC
Qatar Charity
ACF

National NGOs
Sungi Development Foundation
Root Work Foundation
Idea
CHEF
Khwendo Kor
LAND
HANDS
Sindh Development Society
STEP
SEARCH
RDF
VCDO
CSSP
IRADO
VISWA

NGO Networks
The Age and Disability Task Force
The Pakistan Humanitarian Forum

Accountability Working and Learning Group: Islamabad
Accountability Working and Learning Group: Hyderabad
The National Humanitarian Network

UN
OCHA
UN Women
FAO
UNICEF
WFP
UNDP
The Humanitarian Coordinator

Other
Internews
IOM

Donors
DANIDA
AusAID
DfID

Cluster leads
Food Security
Protection
Nutrition
Shelter