PRINCIPLED HUMANITARIAN ASSISTANCE OF ECHO PARTNERS IN IRAQ

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Cover photo: Qayyarah, Iraq, 5 March 2017 / HERE-Geneva

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* The Steering Committee was composed of representatives from ACF, NCCI, NRC, OCHA, and UNICEF.

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closing the gap between policy and humanitarian practice

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Acronyms

ACF	Action Contre la Faim
CCCM	Camp Coordination and Camp Management
CMCoord	Humanitarian Civil-Military Coordination (UN)
DFID	United Kingdom Department for International Development
DRC	Danish Refugee Council
DSRG	Deputy Special Representative of the Secretary-General
ECHO	Directorate-General for European Civil Protection and Humanitarian Aid Operations
EU	European Union
HC	Humanitarian Coordinator
HCT	Humanitarian Country Team
HIP	Humanitarian Implementation Plan (ECHO)
HRP	Humanitarian Response Plan (UN)
IASC	Inter-Agency Standing Committee
ICCG	Inter-Cluster Coordination Group
ICRC	International Committee of the Red Cross
IDP	Internally Displaced Person
IHL	International Humanitarian Law
IMC	International Medical Corps
INGO	International Non-Governmental Organisation
INSO	The International NGO Safety Organisation
IOM	International Organisation for Migration
IRC	International Rescue Committee

ISF	Iraqi Security Forces
ISIL	Islamic State of Iraq and the Levant
KRG	Kurdistan Regional Government
MSF	Médecins Sans Frontières
NCCI	NGO Coordination Committee for Iraq
NFI	Non-Food Item
NGO	Non-Governmental Organisation
NRC	Norwegian Refugee Council
OCHA	UN Office for the Coordination of Humanitarian Affairs
OFDA	The Office of United States Foreign Disaster Assistance
OPR	Operational Peer Review
PIN	People in Need
PMF	Popular Mobilisation Forces
RC	Resident Coordinator
ToR	Terms of Reference
TdH	Terre des Hommes
UN	United Nations
UNAMI	United Nations Assistance Mission for Iraq
UNDP	United Nations Development Programme
UNDSS	UN Department of Safety and Security
UNFPA	United Nations Population Fund
UNGA	United Nations General Assembly
UNHCR	The office of the United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Fund
USAID	United States Agency for International Development
WHO	World Health Organisation

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Executive Summary

Commissioned by NRC with the support of ECHO, this review takes an in-depth look at the extent to which humanitarian organisations that receive ECHO funding have incorporated the humanitarian principles in their strategy, decision-making, and practice in Iraq. In Iraq, humanitarian actors are confronted with a multitude of political and military obstacles that challenge the consistent application of humanitarian principles. This is by no means a new phenomenon, but a closer look at how humanitarian organisations work to uphold principled humanitarian action seems long overdue. To what degree do humanitarian organisations, in particular those funded by ECHO, use the four core principles of humanity, impartiality, neutrality, and independence, in order to create the space necessary to operate in war-torn areas in Iraq, to secure and maintain access to people in crisis?

This review takes the four principles as the main components of agencies' humanitarian identity, and looks at the efforts that they have undertaken to preserve this identity. As part of the methodology, a sample was developed of 15 organisations – half of the total number of ECHO's partners in Iraq – including four UN agencies, the ICRC, and ten international NGOs of different sizes, and active in different fields of activity. The review included an analysis of these agencies' documents for Iraq, such as country strategies and plans, and semi-

HUMANITARIAN PRINCIPLES UNDOUBTEDLY DO PLAY A ROLE FOR ECHO PARTNERS IN IRAQ

structured interviews with at least one senior representative of each of organisations part of the sample. The Review Team also held interviews with beneficiaries, local authorities, several humanitarian organisations that do not receive ECHO funding, and representatives of two other donor governments. In Iraq, the Review Team conducted most interviews with partner representatives from Erbil, but also visited areas around Mosul in the Ninewah Governorate, the capital Baghdad, Tikrit in Salah-al-Din Governorate, and Kirkuk city in Kirkuk governorate.

Humanitarian principles undoubtedly do play a role for ECHO partners in Iraq. The team heard all ECHO partners argue that they consider the principles when they set priorities, negotiate access, and decide on the type and level of engagement with armed forces. They also use the principles as selling points when advocating with the armed forces that they adhere to humanitarian norms in the conduct of war. There is great divergence, however, in the extent to which ECHO partners use the principles strategically to preserve their humanitarian identity, and in how they operationalise, understand, and weigh them in practice. If the principles are to function as a common denominator within the humanitarian community, this does not bode well for the quality and effectiveness of humanitarian

action. The principles are used as a justification both to intervene and not to intervene in the same location. Noting these significant differences, the Review Team does not judge whether a position that agencies take is right or wrong, but focuses on the extent to which the principles shaped their position in the first place. Principled humanitarian action requires demonstrable evidence in terms of how humanitarian organisations consider and weigh the four principles in their decision-making.

Taking this as the main criterion in preserving humanitarian identity, the review identifies a number of concerns. First, the Review Team found that many organisations shy away from accessing or maintaining a presence in areas that have been labelled as 'hard to reach'. This is worrying as the team assumes that because of violence and insecurity, humanitarian needs may be higher in these areas, while the presence of agencies expected to assist people in need is lower. More than a century and a half ago, humanitarian action was designed to be delivered in insecure conditions, but in 2017 in Iraq, it seems to focus on areas that are less volatile. The balance between seeking access and the prevailing security situation is a highly complex issue. The Review Team did not find any clear criteria for using the term 'hard to reach' and, in fact, sees it as a self-fulfilling prophecy. By not even assessing levels of violence or insecurity or regularly meeting themselves with relevant authorities and military to establish trust, acceptance, and ultimately access, a number of agencies in fact risk *making* these areas 'hard to reach'. The Review Team saw very few investments in capacity and broader context analysis that would enable organisations to develop and maintain the understanding necessary to establish access on a daily basis, especially for areas in Iraq that may not be in the international spotlight, but where significant needs may be found.

THERE IS GREAT DIVERGENCE IN THE EXTENT TO WHICH ECHO PARTNERS USE THE PRINCIPLES STRATEGICALLY TO PRESERVE THEIR HUMANITARIAN IDENTITY, AND IN HOW THEY OPERATIONALISE, UNDERSTAND, AND WEIGH THEM IN PRACTICE.

Secondly, the Review Team is concerned by the low levels of investments made by organisations to understand or change the perceptions that local stakeholders have of humanitarian aid. How does one justify following the policy of working on the basis of acceptance, if one has gathered little information or made little effort to know how one's organisation is perceived by the relevant stakeholders? The Review Team feels that there is room for organisations to improve their communications and interaction with affected populations and other stakeholders on humanitarian activities.

Thirdly, as noted, the Review Team sees an urgent need for more openness, transparency, and dialogue within and among organisations on their decision-making involving humanitarian principles. The review came across several situations in Iraq in which all four principles (should) play a critical role in organisations' decisions on their terms of engagement. At the heart of the matter lie difficult questions related to the balance between assistance and protection, as two aspects of the principle of humanity, and the balance between humanity, on the one hand, and neutrality and independence, on the other hand.

The dilemma between assistance and protection, for example, arises in the context of the screening of Iraqi civilians who have been living in areas under control of ISIL. These people need assistance, but this assistance should be accompanied by advocacy for their rights, such as those to humane treatment or a fair trial. In other words, humanitarian organisations need to have an eye for the environment and engage with authorities and military when these protection standards are not taken into account. Likewise, too close an association with the Iraqi military, or the agenda of the government or Western nations, for example, in accepting armed escorts or delivering medical services in their direct vicinity, may have a detrimental impact on the perception of (all) aid organisations and affect their ability to negotiate access elsewhere. Humanitarian organisations must consider alternatives and make investments for developing and maintaining access, instead of institutionalising their reliance on armed forces to facilitate their work. The humanitarian imperative should not become a justification for delivering services regardless of the circumstances. Inter-agency dialogue, coordination, and accountability on decision-making in the face of these dilemmas is essential as it will contribute to better articulated positions and ensure that agencies

are aware of what to expect from one another. Such conversations are well-underway in a number of coordination mechanisms, but they can be stepped up further.

In relation to these main findings, the review includes a number of recommendations that are primarily directed at ECHO and those organisations that receive ECHO's financial support. The Review Team recommends, however, that other organisations working in Iraq, or in other armed conflicts, review and discuss these recommendations as well. After decades of humanitarian work, it is worryingly emblematic that the principles – the very cornerstones of humanitarian action – have not been used as the baseline of this type of operational review until now. Looking at the global humanitarian landscape, it is clear that the majority of situations requiring humanitarian response are armed conflicts. While this review may be long overdue, it is hoped that it can become a leading example for other donors and organisations wanting to invest in more effective humanitarian response in armed conflict, not only in Iraq, but worldwide.

1
Introduction

Within the domain of humanitarian action, the values of life and the worth and fundamental dignity of every human being have been translated into the four core humanitarian principles of humanity, impartiality, neutrality, and independence. Over the past fifty years,

IN IRAQ, AS MUCH AS IN OTHER COUNTRIES, HUMANITARIAN ACTORS ARE CONFRONTED WITH A MULTITUDE OF POLITICAL AND MILITARY PRIORITIES THAT OVERSHADOW AND CHALLENGE THE CONSISTENT APPLICATION OF HUMANITARIAN PRINCIPLES, RISKING THE CONFINEMENT OF HUMANITARIAN ACTION TO CERTAIN AREAS.

these principles have become a shared reference in humanitarian action, and they are supposed to function as a common denominator within the humanitarian community as well as a practical tool. As such, the way in which they are understood and operationalised define a humanitarian organisation's identity. There is a vast literature on the role and history of the humanitarian principles, discussing for example their importance for facilitating acceptance in insecure environments (Slim, 1997; Egeland, Harmer, & Stoddard, 2011; Collinson & Elhawary, 2012), and challenges organisations face in maintaining these principles (Egeland, Harmer, & Stoddard, 2011; Schenkenberg van Mierop, 2016, NRC/Handicap International, 2016). It is noteworthy however that most literature on the humanitarian principles is of a general and secondary nature rather than based on

empirical, field-level research (Schreter & Harmer, 2013, p. 37, HERE, 2015). Commissioned by NRC with the support of ECHO,[1] this work contributes to filling that gap, by looking in-depth at the extent to which ECHO's partners in Iraq have incorporated the humanitarian principles, both at the level of their programme strategy and at the level of the implementation of their work in the field.

In Iraq, as much as in other countries, humanitarian actors are confronted with a multitude of political and military priorities that overshadow and challenge the consistent application of humanitarian principles, risking the confinement of humanitarian action to certain areas. Visibility and understanding of humanitarian needs in areas to which there is little or no access are consequently curtailed, hampering impartial humanitarian coverage and needs-based humanitarian responses. In Iraq, large groups of civilians are beyond the reach of humanitarian agencies, since it is often highly challenging to establish contacts and dialogues around humanitarian access and presence in relation to insecure areas, where non-state armed actors may be in control. In light of these circumstances, this review looks at the humanitarian identity of ECHO partners, in the sense that it seeks to understand and analyse the way in which these organisations interpret and weigh the principles in deciding where to work. The review has also attempted to identify challenges and obstacles the organisations face in accessing people in need of assistance and/or protection, and assess to what extent these can be linked to their humanitarian identity.

Following this introduction, the second part of this report provides a brief overview of the context in which humanitarian organisations

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1   The review has been overseen by a Steering Committee, chaired by NRC, and composed of representatives from ACF, UNICEF, NCCI, OCHA, and UNICEF.

THIS REVIEW CONSIDERS THE AGGREGATE SET OF ECHO PARTNERS THAT HAVE PARTICIPATED IN THE STUDY, IN ORDER TO HIGHLIGHT COMMON ISSUES AND CONCERNS RELATING TO PRINCIPLED HUMANITARIAN ACTION IN IRAQ.

operate in, in Iraq. In view of framing the background and scope of the study, this section also describes the methodological approach taken, and the analytical framework developed by Review Team. The third part of the report then looks more in detail at how ECHO partners in Iraq have incorporated the humanitarian principles in their work. This entails a discussion on how they have interpreted and attempted to operationalise the principles of humanity, impartiality, neutrality, and independence in specific situations. Before arriving at the conclusions and recommendations of the review, part 4 of the report then looks at ECHO partners' humanitarian identity in the context of certain hard choices that confront their practice.

Importantly, this review is not an evaluation of the individual ECHO partners' ability to uphold the principles, nor is it a comparative review of the level of 'principledness' of ECHO partners as opposed to partners of other donors. Instead, the focus here is upon the aggregate set of ECHO partners that have participated in the study, in order to highlight common issues and concerns relating to principled humanitarian action in Iraq.

◼◼ 2
Background and scope

◼
The Iraqi Context

Humanitarian response is by no means a new field of activity in Iraq. The ICRC has been present in the country since 1980 and the start of the war with Iran. Several other organisations interviewed for this review have had a presence since 1991, the year in which a United States-led international coalition forced the Iraqi army to leave Kuwait, which it had invaded in August 1990. Another group of organisations interviewed for this review started their operations in Iraq in 2003. In March that year, the US-led coalition defeated the regime of Saddam Hussein, triggering years of armed conflict and catastrophic competition for power. With some interruptions and relative calm in a number of regions, the ongoing war can be seen as a continuation of the violent struggle for power that erupted in 2003.

Currently, the armed conflict involves the ISF in their fight against non-state armed groups, most notably ISIL. The ISF are supported by both several non-international parties, including

the Kurdish Peshmerga and PMF units, and by a US-led coalition, which provides political and military support from 60 regional and Western countries. In mid-2014, ISIL advanced through the governorates of Anbar, Ninewah, and Salah-al-Din, coming close to the borders of Dohuk and Erbil governorates, and taking Mosul, making it the de facto capital of ISIL in Iraq. In the first half of 2016, ISF regained control of Ramadi and Falluja, and other key cities and areas in Anbar. By October, government and allied forces had regained control of further key targets in Anbar, Salah-al-Din, and Ninewah governorates, while other parts of the three governorates remain contested among various parties. On 17 October 2016, a military campaign was initiated to retake Mosul. In ISIL-held Hawija, west of Kirkuk city, and in west Anbar, government operations are also in preparation.

As of December 2016, the conflict had led to the displacement of over three million Iraqis, including - along both ethnic and religious lines - Kurds, Arabs, Yezidis, Muslims, and Christians. Others chose or were forced to stay in their communities of origin under the control of ISIL. According to the UN, which designated Iraq as the highest level of emergency in August 2014, around 11 million people are in need of humanitarian assistance in Iraq in 2017. As highlighted in the 2017 Humanitarian Response Plan for Iraq, assessments carried out in late 2016 indicated that 3.2 million people are food insecure, 9.7 million people require health care, 8.7 million protection support, 6.3 million water and sanitation services, and a 3.9 million shelter and household goods. In addition, 3.7 million children need education support (OCHA, 2017).

At the time of this review, significant attention of the UN agencies and other humanitarian organisations is focused on the city of Mosul, its surrounding areas, and areas to which people are fleeing. Yet, Ninewah governorate, where Mosul is located, is far from the only area affected by the conflict. While the numbers of people affected are estimated to be significantly lower in the south of the country, many of the provinces in central and northern Iraq also see hundreds of thousands of people in need (OCHA, 2017). Most humanitarian organisations manage their operations in Iraq from two cities, which are also the main coordination hubs: Baghdad and Erbil. It is comparatively easier to operate from Erbil than Baghdad. A number of INGOs are waiting for their request for registration in Baghdad to be approved. Only a few humanitarian organisations have made attempts to negotiate access to ISIL-held areas.

THIS REVIEW HAS MADE USE OF QUALITATIVE EVALUATION TOOLS, BASED ON DOCUMENT ANALYSIS, DIRECT OBSERVATION, FOCUS GROUP DISCUSSIONS, AND SEMI-STRUCTURED INTERVIEWS WITH KEY INFORMANTS, INCLUDING INGO AND NGO STAFF, UN REPRESENTATIVES, BENEFICIARIES, AND LOCAL AUTHORITY LEADERS.

The Review Team did not receive further details on what these efforts exactly entailed.

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Methodological approach

This review has made use of qualitative evaluation tools, based on document analysis, direct observation, focus group discussions, and semi-structured interviews with key informants, including INGO and NGO staff, UN representatives, beneficiaries, and local authority leaders. The review also made use of a small perception survey grid, which aimed to gather ECHO partner representatives' views with regard to the humanitarian identity of their various organisations. Annex 2 provides an overview of how the analytical framework elaborated for the review relates to the stipulated lines of enquiry, and the methods for data collection. Annex 3 indicates how the sampling of ECHO partners was made. Annex 4 contains the codebook that was used to guide the document analysis. Annex 5 provides for the meeting schedule for the field-study, which was carried out by a two-person Review Team, between 27 February and 12 March 2017.[2] As detailed below in this section and in the annexes, the Review Team carried out semi-structured interviews with 32 ECHO partner representatives, and with 14 other stakeholders from the humanitarian community. The Review Team also met with approximately 80 beneficiaries in four locations, and undertook an analysis of 92 documents provided by ECHO partners.

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2   Some follow-up interviews were also conducted after 12 March, via Skype.

Sampling

ECHO works with approximately 30 partners in Iraq. Given the timeline and scope of this research, and the importance of meeting also with non-ECHO partners and other stakeholders to gather a wider perspective, it was not deemed possible to include all 30 partners for complete examination.

Based on a list of partners provided by ECHO, the Review Team compiled a sample for participation including ACF, DRC, ICRC, IMC, IOM, IRC, Medair, Mercy Corps, Muslim Aid, NRC, PIN, TdH, UNFPA, UNICEF, and WHO.[3] As can be seen in more detail in Annex 3, these 15 organisations were chosen as they belong to different families (UN, the international movement of the Red Cross and Red Crescent, and NGOs); are active in different sectors; represent both faith based and secular backgrounds; have different sizes of operations and capacities; and work in different areas with different level of access, security constraints, and numbers of people in need. The team met with representatives of these organisations in Erbil, Baghdad, Tikrit, and Kirkuk.

Key Informants

In view of the scope of the study, ECHO partner representatives and beneficiaries made up the majority of the informants, but for the purpose of gaining additional perspective on the findings, the Review Team also met with two other major donors in the Iraqi context, namely DFID and USAID/OFDA. The team further interviewed two ECHO partners that are not part of the sample (INSO and UNHCR) because of their relevance for the issues that the Review Team covered,[4] and a number of NGOs that do not receive or take ECHO funding in Iraq, including REACH, MSF-Switzerland, and several local NGOs (i.e. the Human Relief Foundation, the Barzani Charity Foundation, the Rise Foundation, and

3   The full names of the agencies that are referred to here by their acronym can be found in the list of acronyms.

4   INSO and UNHCR have not been considered as part of the sample of this study, since they have been included only for the semi-structured interviews, without triangulation through document analysis.

the Massara Health Association). The interviews with these local organisations provided an additional angle to the understanding of principled humanitarian action in Iraq. In the framework of this study, the Review Team also held discussions with coordinating entities, including NCCI and OCHA representatives, as well as the HC for Iraq, who also serves as DSRG, RC, and UNDP Resident Representative. The Review Team further kept in mind that for this review the participating UN agencies had a double function, being ECHO partners but also donors, in view of their sub-agreements with implementing partners.

Given the importance of stakeholder perceptions in the lines of enquiry provided in the Terms of Reference (Annex 1), the Review Team endeavoured to meet with as many local authorities, and beneficiaries as possible during the two weeks in Iraq. As shown in more detail in Annex 5, the Review Team met with approximately 80 beneficiaries in four locations; Qayyarah, south of Mosul; Bawiza, north-east of Mosul; Kirkuk; and Tikrit. Most of these beneficiaries were approached through focus group discussions, in both in and off-camp settings. A smaller number were also approached randomly during visits in camp-setting. About 40% of the beneficiaries the team met with were women, and for all meetings with beneficiaries, the Review Team had the help of translators. In order to avoid bias, the team was assisted by a different partner organisation in each location in which it met with beneficiaries: NRC in Qayyarah; ACF in Bawiza; IMC and DRC in Tikrit; and Mercy Corps in Kirkuk.

Document analysis

The body of primary data collected through the interviews has been triangulated by the findings from a systematic document analysis, based on documentation provided directly by ECHO and the partners identified in the sample. The partners were asked to provide (where available) their programme strategy documents for Iraq, and any other policy-document deemed useful by them for a review of their mainstreaming of the humanitarian principles. All in all, the Review Team received 92 documents, and analysed them using the Codebook provided in Annex 4. All but two of the 15 ECHO partners part of the sample provided their Iraq country-strategy to the Review Team, and nine provided additional documentation.[5]

5   One ECHO partner did not provide its country-strategy as it was in revision, and one ECHO partner explained that it did not have any specific documentation of interest to provide for the study.

THE REVIEW TEAM MET WITH APPROXIMATELY 80 BENEFICIARIES IN FOUR LOCATIONS. ABOUT 40% OF THESE BENEFICIARIES WERE WOMEN.

The additional documentation was most often specific operational work-plans, and only in two cases were there additional documentation that specifically developed the organisation's position vis-à-vis the humanitarian principles. As many of the documents provided by the partners for the document analysis are confidential, this review does not list them as references, and the findings flowing from them are phrased in general terms.

Limitations

The main limitations of this review have pertained to time and access constraints. First, in view of the relatively high number of stakeholders to meet with in a short time-frame, it was unfortunately not possible to have more in-depth conversations with a wider range of staff in the different organisations. On average, the Review Team met with 1-3 representatives from each organisation, most frequently the country director or the deputy country director, and program managers. Given that the study was focused on a wide range of ECHO partners, it was deemed sufficient to speak with a smaller number of representatives from the sample of selected organisations. Second, in view of the operational specificities of Iraq, and the constraints on access, the team had to be pragmatic in choosing which locations to visit. This limitation was solved to a certain extent by arranging to meet with most ECHO partner representatives in Erbil, and then arranging for shorter visits with various ECHO partners to other locations. Linked to the constraints in regard to timing and scope, it should be highlighted that it has not been possible for this review to control for a number of variables that may play a role in regard to an organisations' mainstreaming of humanitarian principles, namely individual staff experiences, types of programming, and specific locations of operations. While such considerations would have allowed for interesting additional insights, the review has managed to overcome this shortcoming by not treating the ECHO partners individually, but by choosing to look at a representative sample of organisations in terms of type, history, and mandate.

Capturing the humanitarian identity

There is broad recognition that humanitarian principles should underpin and guide any humanitarian action and serve to distinguish it from other forms of relief, particularly in

MOST ORGANISATIONS THAT WERE PART OF THIS REVIEW FRAME THEIR WORK AS BEING IN LINE WITH SEVERAL OR ALL OF THE FOUR PRINCIPLES, BUT THEY ARE LESS CLEAR ON EXACTLY WHAT IT IS THAT THEY DO TO BE RECOGNISED AS APPLYING THEM.

situations of armed conflict. These principles are enshrined in various international instruments, including UN General Assembly Resolution 46/182 (1991) and subsequent resolutions (e.g. UNGA Res. 58/114 – 2004) and, especially relevant for the European Union, the European Consensus on Humanitarian Aid adopted by the EU institutions and the Member States in December 2007. The four core principles (humanity, impartiality, neutrality, and independence) find their origin in the Fundamental Principles of the International Red Cross and Red Crescent Movement, proclaimed in Vienna in 1965. For NGOs, the principles are laid down in the 1994 Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief.

The four principles are the key-components of the humanitarian identity. They make up the common characteristics of humanitarian actors, and differentiate humanitarian action from other types of activities, and from aid based upon other motivations, and agendas. The very fact that they constitute a common reference may explain why for many of the organisations with whom the Review Team met, the treatment of the principles appears to be more implicit than active. Indeed, as will be discussed further below, most organisations that were part of this review frame their work as being in line with several or all of the four principles, but they are less clear on exactly what it is that they do to be recognised as applying them. When asked about the way in which their organisation's image or work reflects or represents the principles, one ECHO partner noted, for example, that it has activities that prevent sexual abuse and exploitation of beneficiaries. This seems to demonstrate a limited or specific notion of the principles. A representative from another organisation immediately referred to its policy to ensure non-discrimination in all its activities, which in fact relates to one specific

Humanity	Impartiality	Neutrality	Independence
Needs-based assistance and protection	Assistance to people most in need	Political engagement	Institutional and political independence
Efforts to negotiate access and presence	Non-discrimination	Perceptions	Financial independence
Commitment to engaging with affected communities		Balancing neutrality with other principles	Operational independence, including technical and logistical aspects

Figure 1: Analytical framework for assessing humanitarian principles

part of the principle of impartiality. A third interviewee explained that she feels that the principles are part and parcel of everything that her organisation does, though they are not necessarily specifically referred to in the decision-making or priority-setting.

The latter seems the case for many of the interviewed organisations. But the application of the principles cannot be taken for granted, especially as there may be tensions between them. Keeping the humanitarian identity visible requires an effort in terms of demonstrating how agencies understand, consider, and weigh the principles. This effort can be assessed by analysing the principles for their different elements and verifying whether and how organisations have reflected on these issues in their decision-making and operational choices. The analytical framework used for this review is outlined in Figure 1 above, and detailed in Annex 2.[6] It includes the four core principles and provides the various elements that the Review Team considers indispensable if one is to assess their application.
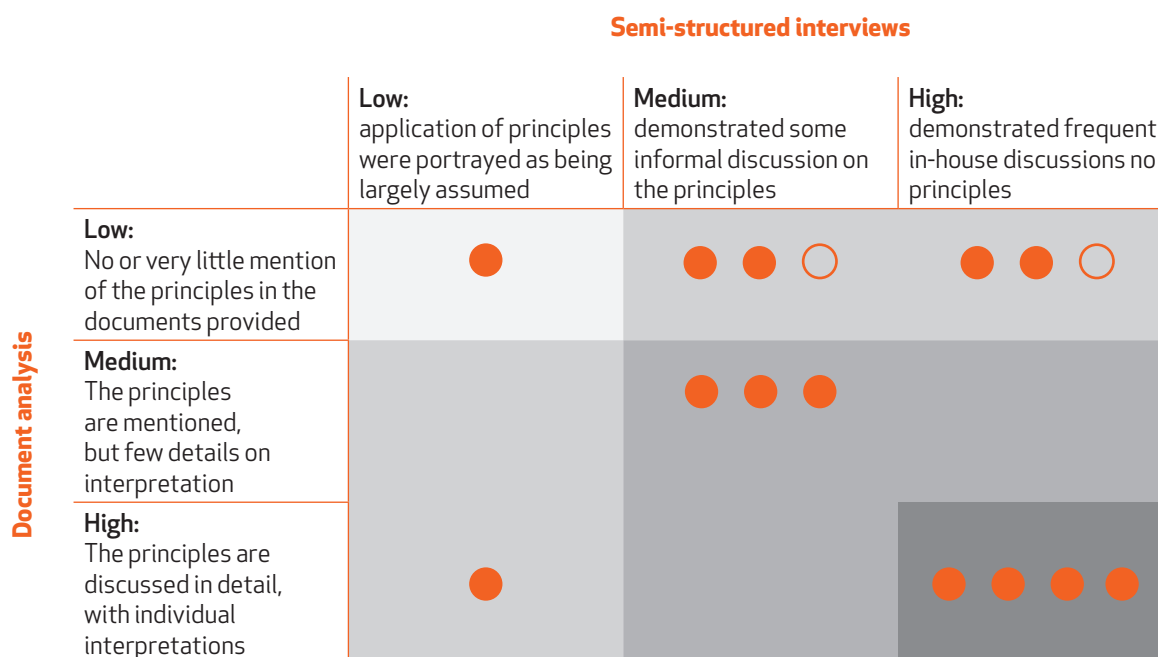
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6   This analytical framework has been developed based on ideas discussed in Schenkenberg, 2016.

APPLYING THE PRINCIPLES CANNOT BE TAKEN FOR GRANTED. KEEPING THE HUMANITARIAN IDENTITY VISIBLE REQUIRES AN EFFORT IN TERMS OF DEMONSTRATING HOW AGENCIES UNDERSTAND, CONSIDER, AND WEIGH THE PRINCIPLES.

3
The diverse humanitarian identity of ECHO partners

Humanitarian principles undoubtedly do play a role for ECHO partners in Iraq. All partners stated that they consider the principles when setting priorities, negotiating access, and deciding on the type and level of engagement with parties to the conflict. This is to a certain extent backed up by the document analysis – seven of the 13 country-strategies for Iraq provided by the ECHO partners specifically referred to the humanitarian principles at least once, and all framed a humanitarian mandate that focused on helping people in need without distinction. The principles also appear to be part of the common knowledge of ECHO's partners in Iraq: the semi-structured interviews with partners indicated that 13 of the 15 partners have regular in-house deliberations on the subject of the principles, and of them seven explained that such discussions are frequent. The large majority of representatives that the Review Team met with could list the four principles of humanity, impartiality, neutrality, and independence, and were well aware of their meaning, though there was some confusion, particularly with regard to the differences between impartiality and neutrality. Representatives from four ECHO partners also mentioned the principle of "do no harm" as one of the humanitarian principles, and one essentially spoke of the principle of non-discrimination as a humanitarian principle. Figure 2 on page 10 provides a simplified overview of the extent to which the humanitarian principles appeared in the document analysis and in the semi-structured interviews respectively, for the 15 ECHO partners part of the sample.

That the humanitarian principles play a role on the theoretical level is clear. In practice, this is less clear. As seen in Figure 2, there

Semi-structured interviews

	Low: application of principles were portrayed as being largely assumed	Medium: demonstrated some informal discussion on the principles	High: demonstrated frequent in-house discussions no principles
Low: No or very little mention of the principles in the documents provided	●	● ● ○	● ● ○
Medium: The principles are mentioned, but few details on interpretation		● ● ●	
High: The principles are discussed in detail, with individual interpretations	●		● ● ● ●

Document analysis

Legend: Each dot represents an ECHO partner part of the sample. The two dots that are unfilled are the two partners that did not submit any documentation for analysis, and they have consequently been categorised as "low" on the document analysis axis.

Figure 2: Level of manifestation of the principles

are significant differences as to the degrees to which the principles are being taken into consideration in internal strategies and decision-making. The Review Team also found that while all ECHO partners argue that the humanitarian principles form the backbone of their work, the way in which they incorporate them in practice in Iraq varies largely from organisation to organisation. In the interviews, the practical dilemmas that ECHO partner representatives mentioned most frequently related to the use of armed security for humanitarian personnel in the contested areas, and situations where they felt they may become inadvertently involved in the screening and detention of displaced Iraqis. With regard to these types of situations in particular, the Review Team could identify significant variations among agencies in how they understand or weigh the principles. Indeed, the team saw the principles being used by ECHO partners as a justification both to intervene and to not intervene.

THE TEAM SAW THE PRINCIPLES BEING USED BY ECHO PARTNERS AS A JUSTIFICATION BOTH TO INTERVENE AND TO NOT INTERVENE.

As mentioned above, this review will not take position on the outcome of the decision-making on principles. When it comes to analysing the humanitarian identity of ECHO partners, for the vast majority of situations it is the process of deliberation – the interpretation of the principles – that matters most, rather than final decisions that can be judged 'right' or 'wrong'. This section will therefore endeavour to highlight where and how interpretations have diverged. In doing so, it will look at each principle in turn, and analyse its application for its different elements in line with the analytical framework.

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Humanity

The analysis of the principle of humanity requires consideration of the extent to which humanitarian access and activities are motivated by needs and protection, and how the need to obtain and secure access has been incorporated as part of an organisation's humanitarian programme.[7] The principle of humanity also calls for a discussion on an organisation's commitment to engage with

7   It should be noted that for the sake of a clear analysis in this review, the issue of 'access' has been included mainly under the principle of humanity. Questions relating to access are undoubtedly multi-dimensional however, and it will also be raised in regard to the analysis of the other principles below.

affected communities. This section will look at these three aspects in turn.

Needs-based assistance and protection

Understandably, for all humanitarian organisations and actors interviewed for this review, the principle of humanity implies responding to people in need. There is less consensus, however, on the weight or exact meaning of this principle. It was frequently cited as the principle that overrides everything else, the humanitarian imperative, linked to the right of people to receive assistance.[8] This led many interviewees to argue that it would be 'imperative' to intervene, in light of the principle of humanity, and sometimes in spite of necessary trade-offs in regard to the other principles. Indeed, the tension between the principle of humanity – portrayed as the humanitarian imperative – and the other principles, particularly neutrality and impartiality, came up again and again in discussions with humanitarian organisations in Iraq, both ECHO partners and non-ECHO partners. Three ECHO partner representatives that the Review Team talked to raised a concern that referring to the principle of humanity as the humanitarian imperative risks ignoring the complexity of both the principle and the operational context. The arguments of these three interviewees followed those by Slim, that the word 'imperative' leaves no space for 'ifs', but that the context or circumstances in fact demand a possibility for nuancing, and that consideration also be given to protection and longer-term implications (Slim, 2002). For them, working in those IDP camps that serve as places for detention of families with suspected affiliations with ISIL was thus a non-starter. The majority of agencies, however, took the view that IDPs in these camps have a right to receive assistance as well, and that this right cannot be outweighed by the dictates of other principles. The balance between the imperative to assist and the need to consider the rights of affected populations and longer-term implications speaks to the heart of the matter on the relationship between the principles and the hard choices that organisations have to make in order to preserve their humanitarian identity. This issue is elaborated in more detail in section 4 below.

Efforts to negotiate access and presence

The Review Team was struck by the fact that

THE BALANCE BETWEEN THE IMPERATIVE TO ASSIST AND THE NEED TO CONSIDER THE RIGHTS OF AFFECTED POPULATIONS AND LONGER-TERM IMPLICATIONS SPEAKS TO THE HEART OF THE MATTER ON THE RELATIONSHIP BETWEEN THE PRINCIPLES AND THE HARD CHOICES THAT ORGANISATIONS HAVE TO MAKE IN ORDER TO PRESERVE THEIR HUMANITARIAN IDENTITY.

representatives from four different ECHO partner organisations argued that "we can't do principled humanitarian assistance since we have no access", rather than taking the default position of "we do principled humanitarian assistance, to get access". The latter would require a negotiations strategy for access that includes the principles as a reference. Looking at how ECHO partners have incorporated the need to obtain access and secure presence in their humanitarian programming, the Review Team noted a number of significant issues.

First, for a range of humanitarian organisations, their security managers are often among the first staff to enter new areas. These staff, many of whom do not have an operational humanitarian background, have a major, if not the only, say in declaring an area safe or not. The critical question of who makes the decisions in terms of the balance between the operational necessity (in light of the principle of humanity) and staff safety considerations, and how these decisions are made, can have serious operational implications. The Review Team heard of a number of examples of internal security limitations. In one organisation, a staff member responsible for the management of a camp could only visit the camp in question once a week, since she had to go there in an armoured vehicle, and the organisation only had access to two such vehicles. Another organisation representative highlighted that "a main internal difficulty to reach people in need is to figure out how quickly we can move into new areas that are possibly booby-trapped". Other organisation representatives explained that their type of programming was not shaped to quickly move into new areas, and that their organisational

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8   This linkage is also explicit in the 1994 Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief, which notes as the first principle that "the humanitarian imperative comes first" and defines it as the right to receive assistance and to offer it.

structure simply was not created to respond to the type of rapidly changing context as the one found in Iraq. These examples suggest that the humanitarian imperative to ensure access to populations in need is frequently outweighed by security concerns. At the same time, it does not seem to weigh heavily enough upon the strategic development of the organisation's capacity to overcome such insecurity.[9] Interestingly, the Review Team noted that a minority of ECHO partners – typically smaller organisations – did not raise these types of concerns. Possibly, they are more flexible as they have fewer internal procedural or bureaucratic issues to deal with in their decision-making.

Second, the Review Team also found that the efforts of making contact with military forces and armed groups, and engaging with them to negotiate access indispensable for developing acceptance have in many cases been outsourced. Indeed, there is a tendency among the majority of ECHO partners to leave the job of engaging with armed forces to OCHA's CMCoord.[10] This is not the fault or a critique of OCHA's CMCoord function. Rather, a number of the ECHO partners in question explained that it was very easy for them institutionally to rely on CMCoord, since they would not have to engage too many scarce resources in, as put by one interviewee, "trying to keep up with the daily changes at the checkpoints". They also highlighted that they found it very practical to centralise the requests for entry letters through CMCoord, since it for example allowed them to show one standard access letter at all checkpoints. As one interviewee said: "the link to [CMCoord] has been useful for us, because it means we don't have to face the dilemma of facing any military of sorts". The Review Team noted with concern that contact with the military is viewed not as a necessity, albeit a complex one, but as a dilemma. Only five of the ECHO partners of the sample explained that they had worked to develop their own networks, making contacts with the various troops, armed groups, and militias. Of these, four highlighted that they do this in addition to exchanging security information with CMCoord. The Review Team found that these organisations tend to be able to move more quickly into new areas than the majority of ECHO partners, who have not made similar investments.

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9   The question on the balance between security and access in light of humanitarian principles is further dealt with in section 4 on hard choices.

10   Unfortunately, the Review Team could not meet with the CMCoord team in Iraq, something which could possibly have given additional insight with regard to some partners' reliance on them for the facilitation of access.

THE REVIEW TEAM ALSO FOUND THAT THE EFFORTS OF MAKING CONTACT WITH MILITARY FORCES AND ARMED GROUPS, AND ENGAGING WITH THEM TO NEGOTIATE ACCESS INDISPENSABLE FOR DEVELOPING ACCEPTANCE HAVE IN MANY CASES BEEN OUTSOURCED.

Third, the Review Team heard the frequent and wide-ranging use of the term 'hard to reach areas'. When asked how they would define the term, some ECHO partners simply said that it refers to areas with particularly demanding security requirements. This would appear to be a natural consequence of humanitarian work in armed conflict settings. Others referred to ISIL-held areas and noted that it is impossible to engage with this actor as it does not accept IHL and humanitarian principles. Three partners also argued that 'hard to reach' areas are those that are under-served by others, and hence where the access has not already been granted. This would not appear to be sufficient to be a justifiable barrier to humanitarian action, as it would rather indicate an 'unreached' area than a 'hard to reach' one.

It is important at this point to highlight that humanitarian access should be thought about as working in two directions: it is a question of the organisations' access to people in need, but it is also a question of people's access to humanitarian aid. A third of the ECHO partners specifically reasoned that their way of working was not conducive to readily follow the shifting frontline as possible, and they insisted that the fact that they stayed further behind the frontline did not mean that people could not come to them. In relation to this argument, these organisations also emphasised that they did not provide emergency life-saving assistance, and therefore, there would be no need for them to be continuously close to where life-saving assistance would be needed. On the contrary, they felt that working further away from the frontline was better for the sake of the protection of their beneficiaries, and that having people in need coming to them was a significant part of how they interpreted their fulfilment of the principle of impartiality.

Damaged bridge across the Tigris / HERE-Geneva

Commitments on engagement with affected communities

The Review Team also looked at the way in which ECHO partners engage with affected populations. The document analysis carried out for this review indicated strongly that ECHO partners frame the principle of humanity as a concern for dignity and for accountability to affected populations. The mention of such accountability is most often geared towards the participation of affected populations in programme implementation. However, two ECHO partners of the sample also provided accountability frameworks that specifically highlighted a willingness to include affected populations also in decision-making. While accountability to affected populations is hence reflected as a commitment from a policy perspective, when it comes to practice, it is noteworthy that the majority of ECHO partners of the sample explained that it is very difficult to ensure adequate engagement with affected communities in emergency settings.

ONLY A SMALL MINORITY OF THE ECHO PARTNERS OF THE SAMPLE FIND THAT LIFE-SAVING ASSISTANCE AS CLOSE AS POSSIBLE TO THE FRONT-LINE NECESSARILY FORMS AN ESSENTIAL COMPONENT OF TARGETING THOSE MOST IN NEED.

Representatives from seven ECHO partners explained that they would have liked to have more capacity to include affected populations in the decision-making processes. They also argued that they frequently find themselves unable to do so, essentially because they have to operate in emergency-mode, meaning that there is less time and scope for engaging with affected communities. Ten of the ECHO partners interviewed agreed that engagement with local communities becomes easier in more stable environments.

Impartiality

As per the analytical framework, the assessment of the principle of impartiality calls for consideration of the degree to which an organisation's programme strategy aims to address those people most in need, as well as ensuring that aid is distributed on a non-discriminatory basis.

Assistance to people most in need

The Review Team found various approaches to defining needs among ECHO and its partners. The qualification of most in need also gave rise to various interpretations, with geography and status (e.g. IDP) often used as proxy indicators of need, as were related concepts such as vulnerability and risk.

ECHO's annual HIP explains its strategy and provides guidance to potential partners in the preparation of their proposals. While not necessarily defining 'most in need', life-saving assistance, which can be seen as one way of

responding to those most in need, certainly appears among ECHO's funding priorities in the most recent HIPs (ECHO, 2016 and 2017). And although ECHO's 2017 strategy aims to target also longer-term displaced, the Review Team heard from six different ECHO partners that in their view, ECHO focuses primarily on targeting those who are newly displaced or are located in war zones. For example, when asked about his view on ECHO's priorities, one partner representative argued that, "ECHO funds first line emergency response". Another organisation representative argued that in their view, "ECHO is chasing every emergency, and their insistence on looking at newly displaced all the time means that they miss protractedly displaced with significant needs".

Only a small minority of the ECHO partners of the sample find that life-saving assistance as close as possible to the front-line necessarily forms an essential component of targeting those most in need. Importantly, the document analysis shows that only two partners of the sample use the qualifier 'most in need' in their country-strategy, thus potentially watering down the instruction of this principle. In nine cases, organisation country-strategies highlight 'vulnerability' or populations 'at risk' as guiding their activities, rather than 'need' per se. The conflation of 'vulnerability' and 'in need' is an issue that the Review Team frequently heard justified by the fact that the formulation of 'most in need' is not relevant for Iraq, where large segments of the population are in need, and have been for many years. The logic, of course, could be precisely the opposite: because all are in need and because all cannot possibly be served, aid agencies must prioritise those most in need. For example, those who have been displaced for several months or years and whose resources have been depleted as they covered their cost of living (particularly in non-camp situations) will have become very vulnerable and may also find themselves with numerous important needs. The assistance they need, however, is perhaps of a longer-term nature than that of those who have become newly displaced.

Geographically, speaking in general terms, it would be reasonable to assume that needs will be more urgent in areas that see higher levels of insecurity and violence. Coverage of needs in these areas tends to be less, as fewer agencies have been able to access and develop presence there. ISIL-held areas are beyond the reach of most humanitarian organisations in Iraq and, as a consequence, levels of need among the population are largely unknown, but probably high, certainly when it comes to protection

BECAUSE ALL ARE IN NEED AND ALL CANNOT POSSIBLY BE SERVED, AID AGENCIES MUST PRIORITISE THOSE MOST IN NEED.

needs. Asked about their organisations' adherence to the principles, four different ECHO partner representatives stated clearly that "we are not impartial since we do no work in ISIL areas".[11] Others argued that they are impartial even though they cannot reach ISIL areas, since it is not for lack of trying that they do not have access there. Certain partner organisations argue that while they do not work in ISIL areas where they assume the highest needs are, they are still impartial since they do seek to help those most in need in the areas where they do have access.

As many as nine of the 15 ECHO partners of the sample made reference to the principle of impartiality by noting that they attempt to work in areas where not so many are working. Five of them explained that they look at partner coverage when they decide on what to do and where to go. Three of those five also argued that they do all, or almost all, of their work off-camp, specifically because there are fewer aid actors present, and therefore higher needs. As one of them, a relatively small organisation, argued: "Work in camps is much easier, so big players go there. But off camp is where we see the needs are highest". As per the ToR, the Review Team did not look into the functioning of the clusters, inter-cluster mechanism(s) and the HCT, but, it heard several references from ECHO partners to these coordination mechanisms, and the degree to which they look at the principles appears as an important issue for further consideration. In general, the team wishes to note that gap identification and analysis in terms of unmet needs should be the first priority of every humanitarian coordination mechanism, including also the country-based pooled fund. In this way, the principle of impartiality guides the coordination process in addressing gaps. A majority of interviewees highlighted spontaneously in this context that they feel there is room for improvement in Iraq.

Closely linked to the definition of most in need is the targeting of assistance according to categories related to displacement status. Several interviewees noted that distinguishing

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11   A number of ECHO partners made similar remarks but did so in the context of the principle of neutrality.

based on the level of need of IDPs, returnees, 'remainees,'[12] and host community would only lead to tensions, and hamper access negotiations. As one interviewee argued, "If you target those most in need only, in certain areas that just leads to social tension; so frequently in Iraq, we find ourselves doing blanket distribution to everyone in a village". When asked whether such blanket distribution arguably reduced the amount of aid available to those most in need, the interviewee explained that needs were prevalent for everyone in Iraq, so a blanket distribution did not change much in this regard. Two other organisations similarly stated that for the same reason, they would never distinguish between recipients based on needs for their first distribution. Three partners of the sample all highlighted that they felt their acceptance was made easier if they did a first response through a blanket distribution of NFIs, "to show that we deliver – we're not here for the talking". Under the circumstances, blanket distribution might be a reasonable operational compromise to the principle of impartiality.

Non-discrimination

ECHO partners were quick to note that they do not distinguish their beneficiaries in Iraq on the basis of aspects such as religious beliefs, political opinion, or ethnic, and cultural background. One issue, not uniquely linked to Iraq but often overlooked, is the preference of humanitarian organisations to support certain beneficiary groups regardless of their status of need, but based on their organisational mandates or missions, and the type of work they carry out and for whom. When asked the question of how they prioritise activities and funding allocations, a third of the ECHO partners of the sample mentioned that they look at what the needs are, but also stated that they reflect on the comparative advantages of their organisation. Two other partners did not even mention need when asked this question, but mentioned the types of activities they could be involved in, and also donor priorities. As one interviewee put it, "there is no checklist, but it is a question of capacity, and it's based

on donor interest as well". With regards to organisational mandates and needs, it is however also important to note that a rather high number of the partners of the sample with a traditionally more developmental approach have chosen to focus on humanitarian work in Iraq after identifying that as the most urgent type of action required. As one organisation representative stated, "we are a children organisation, but we do other things when we are the only ones there". Another organisation representative argued that "we aren't a front-line emergency response organisation, but work between recovery and emergency. In Iraq, we're a bit different due to the many displacements, which make it important to do emergency work".

Interestingly, one ECHO partner of the sample highlighted on the contrary that they are now transitioning from purely humanitarian work to humanitarian work with a mix of livelihoods. The reason for this is that they see the long-term very important for Iraq, due to the fact that it is a middle-income country that does not only have life-saving needs.

All ECHO partners noted that they make a specific effort to ensure that their Iraqi members of staff represent the various religious and ethnic groups. Several also admitted however that in certain situations this has led to some tensions among their workforce, reflecting the highly sensitive political situation and violent struggle for power and dominance in Iraq. Five ECHO partners explained that while they made an effort to have a wide representation on their staff, they had difficulties hiring non-Kurdish staff due to KRG regulations. One organisation therefore explained that most of their staff are Kurds, who are reluctant to go to Arab areas and Mosul. Another organisation representative mentioned having received threats and been offered bribes from the authorities with regard to one of their programmes in Dohuk, something which in the end has lead them to decide that they will phase-out this programming in the long run.

It would therefore generally seem that while many ECHO partners frame their assistance as needs-driven, they do look first at where they can work, and what they can do, rather than where they are most needed, or what is more needed. Nonetheless, they do attempt to balance the capacity of the organisation with the criticality of programming, essentially by looking also at the types of activities other organisations engage in, and where.

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12   A term used to designate people that did not leave their homes but who stayed behind in war zones.

THE ISSUE OF THE LACK OF DIALOGUE WITH ISIL IS A CONCERN FOR MANY OF THE ECHO PARTNERS.

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Neutrality

The analysis of the principle of neutrality calls for looking at whether the activities of an organisation give rise to a political engagement of the perception of such, but also if and how the organisation gauges the perceptions of relevant actors with regard to the neutrality of humanitarian aid, and how the it balances neutrality with the other principles.

Political engagement or not?

None of the interviewed ECHO partners expressed a clear worry that they were seen as engaged in political affairs, though the issue of the lack of dialogue with ISIL was a concern for many of them. More than half of the ECHO partners that the Review Team met with judged themselves as not neutral, particularly since they did not work in ISIL-controlled areas. The remaining ECHO partners of the sample found that their neutrality was not put in question as long as it was not their decision not to work in certain areas, but rather ISIL that did not accept their aid. Interestingly, one ECHO partner from the sample took a very different view on the matter, arguing that they could be neutral in Iraq thanks to CMCoord. "They do the negotiations, and then we just have to do the work. We keep our neutrality by not engaging with the military on the ground, whose affiliation is not known to us", the representative said. Such an approach seems to confuse an important measure for establishing and maintaining neutrality (negotiations with armed actors) with the potential impact on perception.

One organisation representative argued that "the issue in Iraq isn't so much that we don't work in ISIL-controlled areas, because we wouldn't be able to do that in any case, but more how NGOs have lined up behind the UN and the military operations of the Iraqi government". Indeed, representatives of five of the ECHO partners of the sample pointed to the primarily political mission of UNAMI, which clearly seeks a victory in the war against ISIL.[13] UNAMI is mandated to advise and assist the Government of Iraq and, while "UNAMI itself does not implement or deliver humanitarian (and development) programmes, it recognises the critical importance of supporting the partnership and technical cooperation between the Government and the 20 UN agencies, funds and programmes

THE REVIEW TEAM FOUND LITTLE EVIDENCE, HOWEVER, OF ORGANISATIONS MAKING A SPECIFIC EFFORT TO UNDERSTAND THE PERCEPTIONS THAT EXIST OF THEM AMONG LOCAL AUTHORITIES AND AFFECTED COMMUNITIES, NOT TO MENTION ARMED GROUPS.

operating in the country" (UNAMI website). As one interviewee noted, "while the UN agencies' role is to support the government, we support the population".

The debate on the impact of UN integrated missions on the neutrality of humanitarian response delivered by the UN and its partners has been a long-standing one. Globally, OCHA maintains that in the context of integrated missions there is independence of decision-making on humanitarian issues (Schenkenberg van Mierop, 2016, p. 309). In Iraq, the HC told the Review Team that she strictly separates her various roles and responsibilities, and that humanitarian coordination has its own structures and mechanisms. While this may be the case, the Review Team has noted that the various mandates combined in one UN official may be confusing. As has become standard practice in UN integrated missions, the HC is also the DSRG, RC, and UNDP Resident Representative. In these other roles she has been seen to take positions which amount to political engagement, and even though she may have stressed making such statements in a different capacity,[14] this has arguably not always been clear. Several ECHO partners that the Review Team met with questioned the extent to which the separation between these different roles was well understood by all stakeholders on the ground.

The document analysis for this review has shown that only four of the ECHO partners' country-strategies for Iraq specifically insist on neutrality, and some ECHO partners, especially

13   See. e.g. UN Security Council, Meetings and Press Coverage, 2 February, 2017 <https://www.un.org/press/en/2017/sc12703.doc.htm>.

14   See e.g. http://www.un.org/apps/news/story.asp?NewsID=55948#.WMPWfX_NVha, and Press Release, UNDP http://www.undp.org/content/undp/en/home/presscenter/pressreleases/2017/03/06/eu-and-undp-to-support-millions-of-iraqis-in-liberated-areas-get-back-on-their-feet.html.

Qayyarah Airstrip Emergency Site / HERE-Geneva

UN agencies, but also two NGOs, even highlight that providing support to the Iraqi government is part of their intended activities. It is also significant to note that in documentation received, eight of 13 partners make use of the term 'liberated areas', indicating an underlying assumption that there is a common enemy in the Iraq conflict from whom the country is being freed. The term 'liberated areas' was also used by five ECHO partner representatives in the interviews, though when questioned about this, all of them explained that it would be better to refer to 'newly re-taken areas', or 'newly accessible areas'. Several partners, not only the UN agencies, also use rather judgmental language when referring to ISIL in their documentation.

One further issue on which views differed is the question of receiving funds from belligerent states. Only a minority of ECHO partners in the sample demonstrated that they had a clear strategy for Iraq in which they refused or had expressed concern for taking funding from certain donor governments. Interestingly, for a number of organisations these concerns relate

SEVERAL ORGANISATIONS HIGHLIGHTED THAT THE CONTEXT OF IRAQ CALLS FOR SIGNIFICANT TRADE-OFFS BETWEEN THE RIGHT OF PEOPLE TO RECEIVE ASSISTANCE AND NEUTRALITY.

to governments in the region, and not to the Western donors which are part of the US-led coalition. The Review Team heard no ECHO partner argue that target populations appeared in danger of being perceived to be unduly cooperating with the West by accepting their assistance, nor did any of the beneficiaries met with raise any such concerns.

Perceptions

Most ECHO partners that the Review Team met with spoke of their ambition to ensure that they were perceived not to favour one party of the conflict in the implementation of their activities. For example, one organisation highlighted that it had decided specifically not to enter into negotiations with ISIL to ensure that their staff would not be perceived as ISIL collaborators. Another organisation explained that it tried to distribute aid in the absence of local authority representatives, to not be seen as working together with them. The Review Team found little evidence, however, of organisations making a specific effort to understand the perceptions that exist of them among local authorities and affected communities, not to mention armed groups. Putting this in the context of agencies' engagement with affected communities, it seems at least as a missed opportunity. Some efforts have been made to increase engagement with beneficiary groups, for example through the work of the IDP information centre, an inter-agency initiative to step up information and communications with Iraqi IDPs. Several ECHO partners that the Review Team met with talked rather readily about how they thought they were perceived by the authorities and beneficiaries, indicating that they were indirectly aware of these issues. Thus, one

organisation representative explained that his organisation is currently looking at developing a code of conduct on how to communicate who they are, arguing that they "already feel that people understand it when we say that we're here to serve people in need, with dignity, and unrelated to any government". Some smaller partner organisations also argued that they felt that beneficiaries tended to know them better when they were in areas with fewer actors, and that in camps where many actors were present, the distinctions were less clear. The belief that there is a widespread understanding among affected populations in Iraq of what principled humanitarian action is and is not fits with previous findings on the subject (Hansen, 2007).

In its own conversations with authorities and beneficiaries, the Review Team found contradictory remarks on how well these stakeholders knew or were aware of different humanitarian organisations. Some could name a range of different organisations, whereas others knew of none. Some beneficiaries and local authorities also explained that they had been in contact with a few organisations, though they could not name them specifically. However, when conversations went on, the Review Team noticed that beneficiary representatives could recall the names of certain organisations, most notably the ICRC and MSF. It is equally unclear whether beneficiaries and authorities are aware of the difference between humanitarian action and other forms of aid or charity. While the Review Team did not look further into this, several conversations left it with the impression that what matters most for these stakeholders is the type, quantity, and quality of aid, not who provides it.

In discussions with both local authorities and beneficiaries who said they had been in contact with different organisations, the Review Team heard that in the end they "only see assessments, and no results". Several ECHO partners similarly highlighted the fact that local authorities feel that they have had their share of assessments without seeing results, and that this in fact also makes it more difficult for them to uphold the principle of neutrality, since the authorities become more involved in the actual aid work carried out by the organisation. For example, as one organisation representative explained, "applying the principles in Iraq is very difficult. The government of Kirkuk has had enough of assessment, so they want to negotiate help directly in a specific location. New IDPs are not on their cash list, so they don't benefit if the government authorities dictate the

THE PRINCIPLE OF INDEPENDENCE SHOULD NOT IMPLY NO OR FEW CONTACTS WITH AUTHORITIES OR LESS OPENNESS ON ACTIVITIES. ON THE CONTRARY, THE PRINCIPLE SHOULD ENABLE ORGANISATIONS TO DEVELOP, SAFEGUARD, AND EXPLAIN THEIR AUTONOMY TO MANAGE OPERATIONS.

terms. There is a dilemma for us here: do we do nothing then?" At a minimum, this suggests that agencies need to do a better job in managing expectations, and that this issue has to be part of their conversations with relevant authorities. Another ECHO partner representative also highlighted that preserving an image of neutrality in Iraq is sometimes a huge challenge, as affiliations are quickly assumed. He mentioned an example of local leaders visiting their distribution site vying for voters, making it difficult for them to clarify to the beneficiaries that they had no link with these persons.

One reason for the contradictory statements on how well humanitarian organisations are known or unknown is that most of them use a non-visibility approach. They maintain a low profile, including using cars and offices that do not carry any logos. This low-profile posture dates back at least one decade when, in the first years of the war following the US-led invasion, humanitarian agencies wanted to avoid an association with the countries of the coalition, which made them possible targets (Hansen, 2007). Two ECHO partners of the sample questioned the relevance of this policy today, one because "in reality humanitarian organisations only work on one side of the front-line", and the other because "today, humanitarian actors aren't really a target in Iraq". From the review sample, the organisation that appeared to use the most visibility in Iraq argued that they found this visibility very helpful, since they had been able to build up recognition over time, and now felt that they could go into new areas without armour, "just with multi-sectoral teams and acceptance". The experience of this ECHO partner indicates that if organisations were to step up their public communications about their work in Iraq, as part of stressing their humanitarian identity, it would also make sense to consider increasing their profile and visibility. In this regard, physical

manifestation and communications about the organisation and its work go hand in hand and may contribute to improved understanding and acceptance.

Balancing neutrality with other principles

A majority of the ECHO partners that the Review Team met with highlighted that the instrumentalisation of aid in Iraq is a huge problem as it tends to push NGOs into positions where they do not want to be. Five organisations of the sample explained that these types of issues are inherent to working in armed conflict settings, but eight partner organisations explained that they were particularly uncomfortable with the Iraqi setting. For example, one organisation representative argued that "we haven't been used to functioning in highly militarised contexts, but this context has pushed us to our limits. We have to define our own lines, but how do you negotiate with someone who has a gun?" As mentioned in the section on humanity above, several organisations highlighted that the context of Iraq calls for significant trade-offs between the right of people to receive assistance and neutrality. A small minority of ECHO partners that the Review Team met with stated clearly that they did not find it conceivable to provide aid through the help of military escorts, and some stated that they would not work in camps that had a military presence. Another minority argued that the principle of neutrality lost its value when it no longer worked as a tool for access, and if the only way to access people in need was through the help of military escorts, or working in camps with a military presence, so be it. The majority of ECHO partners that the Review Team met with fell somewhere in between these two extremes, arguing that these types of decisions need to be made on a case-by-case basis. Clearly, decisions such as whether or not to accept escorts from the military require a weighing of the principles, in this case humanity and neutrality. It is noteworthy that different ECHO partners can be seen to have different interpretations regarding the same situation when it comes to deciding whether there is a need to use armed escorts. Indeed, armed escorts may be imposed by the military, but in many situations, organisations themselves decide that they can only access areas with armed escorts. The Review Team has seen that many ECHO partners do not make any significant effort to look for alternatives instead of seeing the two extremes of going (and accepting the escort) and not going (insisting on neutrality) as the only two options. More inter-agency dialogue on these questions and considerations is much needed.

MORE BROADLY, ECHO'S EFFORTS TO ENSURE HUMANITARIAN SPACE IN IRAQ SEEM TO FAVOUR APPROACHES FROM AGENCIES TO DEVELOP AUTONOMY AND PUSH BACK ON POLITICAL OR MILITARY INFLUENCES OR INTERFERENCE.

Independence

The analysis of the principle of independence has been done from the angles of institutional and political independence on the one hand, and financial independence on the other. The analytical framework highlights operational independence as another aspect of this principle. An adequate consideration of operational independence would require a more in-depth study into the functioning of each participating organisation than was possible in the framework of this review. The Review Team therefore did not pay specific attention to this element, but, as noted, saw a particular reliance on CMCoord for travelling into certain areas.

Institutional and political independence

The principle of independence may not be easy to understand in the context of the role of the UN humanitarian agencies. The Review Team heard from all UN agency representatives that a key part of their role is to support the Iraqi government – something which is also clear from the document analysis. This role provides opportunities, but it carries some risk too. The UN has extensively advocated humanitarian norms to be respected and has endeavoured to use its relations with the Iraqi authorities to increase humanitarian space. In spite of this, it is noteworthy that, in relation to health, five NGO representatives that the Review Team met with – both ECHO and non-ECHO partners – argued that they see too close a relationship between UN agencies and the Iraqi authorities. One example frequently cited to the Review Team was war trauma surgery in East Mosul, where medical humanitarian organisations were asked to step in. This, in turn, for them meant a too close relationship with the Iraqi army as a means to reach and receive war-wounded. It should be noted that other medical actors, not interviewed by the Review Team, did decide to become operational in this situation. But, also in relation to other areas of activity, the Review Team heard

that there were cases where the UN cluster lead appears as having conceded to the demands from the authorities, thereby compromising the humanitarian space. For example, the Review Team heard from several NGO representatives – again both ECHO and non-ECHO partners – that they found the allocation of CCCM responsibility to various organisations a highly opaque and patchy process. This may be explained as a number of camps have been constructed and run by the international community, while other camps have been put in place by the Ministry of Migration and Displacement, a responsibility for which it did not shy away. OCHA has confirmed that enormous amounts of time and energy have been spent in the discussions on sites and camps with the authorities. At times, critical issues and concerns had to be raised about camp locations, designated camp managers, and the need to maintain the civilian character of IDP sites and camps. Reportedly, a number of proposed sites have been changed as a result of this engagement and OCHA representatives explained to the Review Team that the approach was always geared towards obtaining early, transparent, and operationally sound decision-making while keeping the UN's partners informed of the progress of the talks with the authorities. In this context, it is important to note that the principle of independence should not imply no or few contacts with authorities or less openness on activities. On the contrary, the principle should enable organisations to develop, safeguard, and explain their autonomy to manage operations.

Financial independence

Generally speaking, very few humanitarian organisations have complete financial independence enabling them to decide when and where to intervene. Many of the larger humanitarian organisations in Iraq manage their financial autonomy by having a range of donors, which allows them flexibility in terms of using different sources of income for different activities and areas. The Review Team met with some INGOs who had more than 20

government donors.[15] For most of them, the US Government (the Bureau for Population, Refugees, and Migration and USAID) and ECHO are among their largest donors. The question of financial independence essentially relates to the conditions these and other donors place upon their funding and whether their funding sufficiently matches up with the needs assessments and gaps analyses done by the agencies. As in all other humanitarian crises, there are variations in organisations' policies for accepting donor funding and as noted above, some agencies have adopted (self-imposed) limitations as to the geographical origin and political background of the donor. A number of organisations, especially larger ones, will search for donors whose operational interests fit with theirs. They assess the degree to which their strategy and plans match with which donor's priorities. Others, in particular smaller agencies, may not be able to not look at what donors are prepared to fund and adjust their projects accordingly. Given this review's specific focus on ECHO, particular attention was paid to the role and relationship with this donor. The Review Team heard various views on the degree to which ECHO's priorities impact on the partners' independence. For its part, ECHO maintains that the partners' proposals need to fit with the HIP, which provides the rationale for its priorities. ECHO's HIP prioritises life-saving assistance in war-torn areas (ECHO, 2016, p. 13, and 2017, pp. 10-11).

All ECHO partners that the Review Team met with described ECHO as a highly principled,[16] "different type of donor". They explained that they greatly value their exchanges with ECHO, and that they appreciate ECHO's deep understanding of the context on the ground. The partners also found that ECHO had a specific interest in funding activities in contested or insecure areas close to frontlines, something which ECHO frames as the priority to address first consequences of conflict, and having a relevant humanitarian presence in the areas affected by conflict.

A number of partners stated that they are given the space to reflect on and develop their strategies and operations in relation to the principles. More than half of the ECHO partners that the Review Team met with highlighted that they appreciated the fact that ECHO 'pushes them' in certain directions, as they found it a

PRESERVING THE HUMANITARIAN IDENTITY DEPENDS UPON USING THE PRINCIPLES TO GUIDE STRATEGY AND OPERATIONS, WHICH, IN TURN, INVOLVES MAKING HARD CHOICES.

15   One INGO, for example, noted that it has 28 government donors in Iraq.

16   This coincides with findings from a previous study; see (ADE & Humanitarian Futures, 2014).

Newly retaken area east of Mosul / HERE-Geneva

constructive process in which they could also 'push back'. Others, however, questioned the degree to which ECHO gives them space to uphold the principle of independence, as they feel that they are continuously pushed to act in certain locations. Thus, the Review Team heard that ECHO has "implementation envy", and that "they transfer the security risk on us". Some partners also highlighted a certain lack of understanding on behalf of ECHO regarding the difficulty they face in swiftly moving their offices and activities into new areas in an ever-changing context. As one interviewee put it, "they do not understand that we are not a small local implementing partner. We are slow, but it's because we do a multi-sectoral approach". One partner argued that it was easier for larger organisations than for smaller ones to 'push back' when ECHO suggested where they would need to go and what to do. However, the Review Team found that while the larger organisations did indeed appear to 'push back' more, the smaller organisations did not argue that this was because they could not do so, but rather because they did not mind following ECHOs suggestions. Generally, the Review Team did see that the smaller organisations of the sample were frequently less risk averse than the larger ones and could more quickly move into new directions – possibly due to less cumbersome internal decision-making procedures allowing for more flexibility and agility. While there is not enough evidence in this study to verify a direct correlation between organisation size and level of risk aversion, it appears an interesting element for further consideration.
In sum, impact of ECHO's HIP upon its partners' independence is mixed, and requires qualification. As a donor, ECHO takes

THE LABEL 'HARD TO REACH AREAS' IS IMPRECISE AND CREATES CONFUSION.

responsibility by defining clear priorities in its HIP. By accepting ECHO funding, humanitarian organisations place themselves in a situation where the more dependent they are on ECHO funding, the more they will have to ensure that their operations correspond to ECHO's priorities, and the less they may feel free to determine their own priorities. Some organisations do not seem to mind this, whereas others have more issues with it. More broadly, ECHO's efforts to ensure humanitarian space in Iraq seem to favour approaches from agencies to develop autonomy and push back on political or military influences or interference.

▬▬▬ 4
Preserving the humanitarian identity: hard choices

Preserving the humanitarian identity depends upon using the principles to guide strategy and operations, which, in turn, involves making hard choices. The principles serve as benchmarks in decision-making, but they do not always point in the same direction. The Review Team heard various terms being used in this context: compromises, trade-offs, or negotiated positions. If there is one thing that did become clear during the review, it is that while there is not necessarily a 'right' or 'wrong' decision, it is essential that humanitarian organisations

are clear, open, and transparent on how they understand or weigh the principles. The Review Team came across a number of situations in which the ECHO partners in Iraq had to make choices, balancing the principles against each other. In several such instances, the Review Team had the impression that organisations had given ample consideration to the principles at issue, either individually or collectively, but this is far from consistent practice.

■

Principles, security, and access

Some ECHO partners expressed reservations to using the principles as a tool to gain humanitarian access in Iraq, as they noted that one party to the conflict refuses to engage with humanitarian organisations. Others did highlight that the principles, especially humanity and impartiality, did play a significant role in negotiating humanitarian access. With regard to the link between the humanitarian principles and access, the Review Team took particular note of the widespread resignation on the part of a number of humanitarian organisations to use the qualification of 'hard to reach' areas without necessarily having the intention to see for themselves whether or not they can in fact reach an area. This is clearly related, of course, to security limitations, many of which seem to be self-imposed. The Review Team developed the impression that in several instances agencies used the security situation as an excuse not to access the populations most in need. That said, the team did not assess the security situation in Iraq as such and cannot determine whether or not organisations are exaggerating the insecure conditions for delivering aid. In a context such as Iraq, the security situation can change very rapidly, especially if one of the armed actors labels aid workers as targets. Pete Buth, however, offers a helpful perspective in this regard when he notes: "It is too easy to put the blame on the external security environment

alone. Instead, humanitarian organisations need to examine how they fare in terms of their institutional willingness and capabilities to accept and manage security risks, which are, after all, an inherent part of humanitarian action". (Buth, 2017).

The Review Team found a large majority of ECHO partners risk-averse, sometimes to a considerable degree. This was something that the interviewees themselves readily recognised, and frequently they even opined that their particular organisation was more risk-averse than most. A representative from one organisation stated that "we're moving away from safety management to risk management, and we are very risk-averse, and because of that, sometimes, others manage to do things we don't". A representative from another organisation found that "there is clearly a slightly higher risk aversion for our organisation than for some others". And an interviewee from yet another partner agency stated simply that "we move slower, but it's safer", indicating that prudence would clearly trump swift action on behalf of her organisation, which would be the opposite for many other organisations. Clearly, interviewees recognised risk aversion as an issue and agreed that it makes principled action more difficult. It also leads to strategies that look at how to get organisations to accept working in these areas, instead of strategies that focus on how to access them.

The label 'hard to reach areas' is imprecise and creates confusion. In verifying where the label came from, the team heard very inconclusive answers. Some interviewees said it specifically refers to ISIL-held areas, but from what the Review Team heard, ISIL-held areas rather appear to be 'impossible to reach'. Others seem to use the term in reference to areas outside government control, but it is not necessarily clear which government they have in mind: the Iraqi government or the KRG. Undeniably, the so-called contested areas (contested between the Iraqi government and KRG) are highly sensitive from a political point of view, and under control of different armed groups, but they are not beyond access. By treating the label 'hard to reach' as a given, it would appear that organisations simply accept that there are areas they cannot go into, omitting the important fact that the dynamic setting of Iraq means that an area that had significant security restrictions one day, may be more readily accessible the next. The Review Team noted that there has been an OCHA-led access working group where these issues could have been discussed; with

TOO MANY ORGANISATIONS HAVE THEIR FIRST ASSESSMENTS INTO NEW AREAS DONE BY THEIR SECURITY OFFICERS, MANY OF WHOM DO NOT HAVE AN OPERATIONAL HUMANITARIAN BACKGROUND.

the start of the Mosul operation, this group is focusing on the Mosul operational response. On the NGO side, NCCI has had the intention to start a Task Force on access, but this group is yet to become active and will need to be taken forward by NGOs as a matter of priority, with adequate resources allocated to ensure appropriate leadership and coordination amongst the humanitarian NGO community.

The Review Team was provided with numerous examples whereby UN cluster lead agencies are not able to adequately monitor the quality of services across several parts of the country. Some UN cluster lead agencies interviewed confirmed that this is due to restrictions in their ability to travel to various project sites. In some instances, this has resulted in agencies resorting to operational modalities such as sub-contracting to partners who are willing to travel and/or work in that location, or alternatively their national staff only being able to access the areas. This is particularly noteworthy as it may have implications for protection-based programming.

The Review Team was also struck by the separation of security and operations. It seems that too many organisations have their first assessments into new areas done by their security officers, many of whom do not have an operational humanitarian background. This trend has been seen within the UN for many years, but it would appear from the organisations that the Review Team has seen in Iraq that it has now spread also to INGOs. From the information that the Review Team could gather, at least four ECHO partners of the sample appeared to opt for the 'easier to reach areas', thereby possibly leaving aside areas where needs may be more urgent. In this regard, it is noteworthy also that in line with a previous study (Stoddard, Haver, & Czwarno, 2016), the Review Team found that organisations do not appear to explicitly address the humanitarian principles in risk management. Indeed, in most interviews, the Review Team heard that dealing with security and fiduciary concerns were the main ingredients of responsible risk-taking, leaving aside reflexions regarding potential risks of not respecting the humanitarian principles. Significantly, only one organisation found it important to provide the Review Team with its risk-management strategy as part of the analysis of their mainstreaming of the humanitarian principles. Some organisations provided country-strategies that did include sections on risk, but these never mentioned the principles. The issues and recommendations

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as raised in the 2011 OCHA Report To Stay and Deliver to work on an enabling environment seem largely to have been ignored (Egeland, Harmer, & Stoddard, 2011).

Armed Escorts
In the interviews, the Review Team specifically asked about the use of armed escorts. A majority of ECHO partners highlighted that the principle of neutrality precluded that they ever revert to armed escorts, even if it would be the only way to gain access in an area. Four ECHO partner representatives specifically explained that if they travel along certain routes to deliver assistance, they had no choice but to accept armed escorts, either due to military forces imposing the escort, or due to self-imposed security measures. Others prefer to engage in negotiations insisting that they enter areas without armed protection, noting the possible implications for their operations in other countries, if they were to work so closely with the military. As one ECHO partner highlighted: "You have to think about it, and balance access here with access elsewhere in the world, and also look at the question of staff safety. The reflection on the principles becomes a filter for your decision". Another ECHO partner representative went even further, noting that in his view most other humanitarian organisations in Iraq are deficient in their implementation of the principles, especially in relation to access and neutrality, which in his view endangers the entire humanitarian enterprise in the long run.

The debate on armed protection, and the tension between the principles of humanity and neutrality, has been most prominent in the context of war trauma surgery in east Mosul. Here, several humanitarian organisations well-known for their medical work decided not to be co-located or closely collaborate with the Iraqi army and work under their protection. They were criticised by others for this decision as it was felt that they failed to follow the humanitarian imperative. War trauma surgery

can be regarded as the most obvious form of life-saving assistance in armed conflicts and, therefore, in the eyes of some does provide the justification for accepting armed protection. And indeed, some argue that the numbers of lives saved in East Mosul by the surgical teams speak for themselves. Pointing to the relevance of IHL, one interviewee noted that his organisation had particularly advocated for the duty of the military medical forces to treat the war-wounded, but that both the military and authorities quickly turned to the humanitarian organisations when they lack the capacity. As highlighted by representatives from two of the UN agencies that the Review Team met with, UN agencies look for implementing partners to support government functions, since the government is a primary duty-bearer. They used the case of the war trauma surgery as an illustrative example of this. It has also been noted that the war trauma surgery is part of a system of emergency medical care including stabilisation on the front lines, ambulance services to field hospitals, and post operation or advanced procedures in major facilities. Meanwhile, as the frontline has shifted, some of the above-mentioned well-known medical organisations that initially refused to work in East Mosul 'embedded', as they put it, with the Iraqi forces now find themselves close to the frontline and have set up significant war trauma treatment programmes.

Principles and protection

In addition to security and access, principles also play a central role with regard to protection. In multiple instances, organisations told the Review Team that a dilemma exists within the principle of humanity in terms of whether assistance or protection should prevail.

This question primarily arises in the context of screening and detention of IDPs. Following efforts to retake ISIL-held areas, people fleeing their homes due to the fighting are stopped by the ISF, and in some cases PMF forces, and screened for possible links with ISIL. Such security screening can be legal under

international law as a measure to ensure the safety and security of the population, including those displaced. However, the way the screening process is carried out in practice poses a range of protection concerns and risks to IDPs, including disappearances, family separations, lengthy detentions, exploitation, and abuse. In addition to this, while in some places the screening process is relatively orderly, in many other places there are different state and non-state forces involved and not all screening takes place under an international eye.

In view of these protection concerns, organisations question whether they should be involved in the process by being present at sites where screening takes place and/or where people become detained. When raising this question with ECHO partners and others, the Review Team received divergent answers. Some were very straightforward about their activities in camps that had become detention centres of IDPs with alleged affiliations with ISIL. As one humanitarian organisation representative put it, "Why should these people be punished again by us refusing to work in the camps? It is the right of the authorities to screen and detain people, but they should be offered a fair trial". Others were more reluctant as they feel that their involvement can be seen as condoning the screening and detention, including a situation where they fall below human rights standards. The Review Team heard six different partner representatives argue that if they choose to work in camps with a military presence, or at screening sites, it allows them to witness protection issues, and take action against them (e.g. advocacy). One ECHO partner representative for example explained that "we work in camps that could be seen as de facto detention camps, but we do consistent advocacy on the issue with camp management". Another stated that "we've been loud and vocal regarding screening in Qayyarah. They put a screening centre outside the front gate. We told the UN, and have been informed it will be removed".

Three ECHO partners also explained that they had decided on principle to not work in, or to withdraw from certain camps that had a prolonged military presence and could be qualified as de facto detention camps. Interestingly, some of these partner representatives noted that they did so to avoid affiliation with the armed forces, in order to safe-guard the principle of neutrality, not necessarily because of a position based on protection concerning the rights of IDPs.

THE REFLECTION ON THE PRINCIPLES BECOMES A FILTER FOR YOUR DECISION.

Whatever the decision to work or not in a militarised, screening/detention site, the Review Team feels that this should not become a zero-sum game. Both decisions (to become involved or remain absent) should be accompanied by continuous engagement and advocacy with the authorities to remind them of their obligations. Only in this way will it become clear that assistance and protection in humanitarian action are inextricably linked and that providing services is not a technical act to be juxtaposed against protection work.

Principled decision-making

The extent to which ECHO partners aim to preserve their humanitarian identity differs between them. As seen in Figure 2 above, the majority of agencies recognise the importance of internal discussion and decision-making processes regarding the principles. This plays out in different ways in different organisations, depending on the agency structure and/or culture. To some ECHO partners, consideration of the principles appears to come naturally. Their ethical framework and value-based motivations are so strong that they have regular internal debates and reflections, sometimes leading to specific publications on their humanitarian positioning. One ECHO partner representative noted that he believes that the principles play a role in everything that organisation decides and does, but that this is not always explicitly clear. Another interviewee took a similar view, noting that "we try to base our work on the principles, so it flows through indirectly to beneficiaries without us communicating specifically on the principles". The size of the organisation may matter as well. One ECHO partner noted that the fact they are a smaller organisation means that the whole staff meet daily, and have informal discussions all the time. For other ECHO partners, notably those that focus on protection, the principles are on the forefront of their mind too. As indicated in Figure 2 however, the Review Team also saw a minority of ECHO partners for whom the principles appeared more as an after-thought.

Looking at the principles and decision-making, the Review Team believes that preserving the humanitarian identity calls for organisational accountability, i.e. that organisations be able to justify their decisions and explain their motivations. This implies honesty, openness, and transparency about the hard choices that organisations may have to make in regard to

PRESERVING THE HUMANITARIAN IDENTITY IMPLICATES ORGANISATIONAL ACCOUNTABILITY, i.e. THAT ORGANISATIONS BE ABLE TO JUSTIFY THEIR DECISIONS AND EXPLAIN THEIR MOTIVATIONS.

the four principles. As noted above, while the Review Team understands that a number of organisations put the principle of humanity (or humanitarian imperative) first, but this should not function as an excuse for accepting all sorts of conditions in order to access people in need.

The Review Team also found that some of the UN actors and INGOs that are ECHO partners relatively rapidly leaned towards operations at the expense of the other principles or protection considerations. It is telling that several interviewees from these organisations noted that they did not see the competing priorities posed by the four principles. What struck the Review Team most, however, is the selectivity with which a number of organisations invoke various principles. These organisations use one or more of the principles as a justification to intervene or not, while in fact other considerations such as risk or profile appear to be major factors behind their decisions.

This, in turn, requires much more honesty and openness with regard to decision-making by all involved. The Review Team was told of of steps that have been taken to promote open discussion on protection issues. A protection brief, for example, is provided at every meeting of the Humanitarian Country Team by the Protection Cluster and the ICCG has been working on a framework for protection action to guide engagement across all clusters. Joint meetings of the HCT and ICCG have been held to discuss the Humanitarian Concept of Operations adopted by the ISF in Mosul and there have been discussions on many complex protection issues related to trauma stabilisation and surgery. While this is positive, the overall impression of the Review Team is that more needs to be done. Advocating with the authorities and military that they uphold humanitarian norms is one thing, but for this to be credible it is at least equally important that organisations themselves consider the principles in addressing operationally challenging situations. The trade-offs or compromises may be inevitable, but

they can be explained as collective challenges. They are never unique to one organisation. Some interviewees expressed doubts on the level of openness that can be realised. "How frank are NGOs going to be about what happens at a checkpoint in a discussion with multi-stakeholders?" was the rhetorical question asked by one of them. Nonetheless, the hard choices need to be given sufficient consideration, including at the inter-agency level, and the environment must encourage such openness. There is not one sole interpretation of the principles possible, and this makes it all the more important that the thought-process behind decisions is made transparent. This review found that this is currently not the case, something which hampers ECHO partners' understanding of each other.

On the positive side, there currently appears to be a fertile ground for exchanges regarding principles among several ECHO partners. The Review Team was told of recent events and workshops organised, and some ECHO partners part of the sample have specific publications formulating their principled stance and/or the reasoning behind their choices. In terms of coordination on principles, the Review Team also noted the efforts of the Protection Cluster to develop what initially whre called 'red lines', i.e. to define conditions under which humanitarian organisations should refrain from intervening. Many ECHO partners highlighted that it would be very welcome to have such a framework. It is the Review Team's understanding that no consensus was reached on the paper produced by Protection Cluster ("Taking a Principled Approach: Framework for Defining Humanitarian Engagement When Humanitarian and Protection Concerns Are Present"), but that a new document is forthcoming. The Review Team

sees good reasons for exchanging views and explaining positions in the various coordination bodies on how agencies understand the principles. These exchanges would most likely help agencies in their own decision-making, to refine their positions, and be able to better articulate their considerations externally. The review has found that most ECHO partners see the value and need for coordination on principles, as well as the need for transparency and clarity on the trade-offs that are being made. As made clear earlier, principled decision-making can have different outcomes, and a coordination process should give room to the various positions. The view or position of one actor should not trump the need for collective reflection and coordination on hard choices.

Donors and Coordination

As noted, matters of principle require collective thinking. As the need for inter-agency coordination on the principles becomes clear, it also raises the question of the appropriate level of donor coordination on principled issues. The Review Team heard from almost all ECHO partners that based on their experience and perceptions, ECHO is the only donor who is openly concerned about the principles. The Review Team also noted that donor representatives from the US and UK governments were much more constrained in their movement in Iraq. ECHO partners made it clear that they see the other donors as more politicised, even though a number of UN actors noted that these donors' diplomatic representatives had been very helpful in taking up issues with the Iraqi government. While ECHO is proactive in promoting principled humanitarian action from the donor side, one of its representatives noted that there is room for improvement within ECHO when it comes to discussing and assessing principles and compromises with its partners. He noted eloquently that "as we ask our partners to report on resilience, we should ask them to report on principles".

In terms of funding available, the Review Team heard from many ECHO partners that it has become much harder for them to mobilise funds for areas in Iraq where the situation has become protracted, but which are beyond the scope of media attention. Clearly, the various donors could contribute to the principle of impartiality by coordinating their financial support for Iraq by following a whole of country approach in which they both support programmes and operations that focus on people with urgent needs and those who find themselves in situations causing longer-term needs and vulnerability. The Review

ADVOCATING WITH THE AUTHORITIES AND MILITARY THAT THEY UPHOLD HUMANITARIAN NORMS IS ONE THING, BUT FOR THIS TO BE CREDIBLE IT IS AT LEAST EQUALLY IMPORTANT THAT ORGANISATIONS THEMSELVES CONSIDER THE PRINCIPLES IN ADDRESSING OPERATIONALLY CHALLENGING SITUATIONS.

Qayyarah, Iraq, 5 March 2017 / HERE-Geneva

Team was told that other than informal contacts among donors there is no humanitarian donor contact or coordination group at the operational working level, as is the case in other countries. Several donors sit as members of the HCT in Iraq, including ECHO but little information is readily available as to the criteria for donors to join. The situation differs from country to country in terms of having donors on HCTs. In certain highly politicised contexts, donors do not participate in the HCT out of a concern that their political agenda may interfere with humanitarian decision-making. While the Review Team does not take a position on this issue, it would seem appropriate for donors, including ECHO, to reflect on the need for more formal coordination among them and to set up, in consultation with the HC and/or HCT , a mechanism for rotating their participation in the HCT or alternative coordination forum, as appropriate. Good donorship also requires coordination among donors.

5
Conclusion and recommendations

Conclusion

The Review Team found clear evidence that the humanitarian principles play a role in the decision-making of ECHO partners in Iraq. However, there is great divergence in the extent to which ECHO partners use the principles strategically to preserve their humanitarian

GOOD DONORSHIP ALSO REQUIRES COORDINATION AMONG DONORS.

identity, and in how they operationalise, understand, and weigh them in practice. Emblematic of these differences is the finding that the principles are used as a justification both to intervene and not to intervene in the same location. Some agencies push to enter areas that others find off limits. These efforts seem to emphasise the principle of humanity, but are at odds with neutrality when they require, or are perceived to require, travel with armed escorts from military forces that are a party to the conflict. Others invoke neutrality to justify their non-intervention, and/or prioritisation of other (easier to reach) areas. Some of them also point to possible implications in terms of perceptions for their operations in other parts of the world.

The Review Team heard various views and approaches on how organisations define needs. The critical aspect for humanitarians is those most in need, as different from people with needs. Defining who are most in need is not easy in Iraq, but the Review Team has found that many organisations shy away from assessing levels of need in areas that have been labelled as 'hard to reach.' The Review Team has noticed with concern a significant level of risk aversion, which it feels does not correspond to the nature of humanitarian work in armed conflict, a situation for which this type of activity has nonetheless been designed. Seeking and negotiating

humanitarian access, especially to areas that are given the label 'hard to reach', should be daily activity. 'Hard to reach' cannot be an excuse for not trying. Moreover, frontline, first response is not only waiting for people to move beyond the frontline and become accessible, but also reaching out to them where they are.

The Review Team has found that too few ECHO partners have made investments in their capacity to perform such work, including to network with relevant (military) stakeholders, to understand and adjust to the rapidly changing context, and to expand their presence of senior staff in areas that are contested. To be sure, the Review Team does not advocate for irresponsible operations in war zones, but it does find that operating in an armed conflict such as the one in Iraq carries the responsibility of addressing people's urgent unmet needs beyond the beaten path (e.g. in areas that do not benefit from high international media coverage). The Review Team understands that many organisations feel there is safety in numbers of organisations operating in an area. This is exactly why the Review Team sees a need for more attention by coordination mechanisms on addressing unmet needs in areas where humanitarian presence is thin.

Likewise, very few resources have been invested in understanding or changing the perceptions that local stakeholders have of humanitarian aid. How does one justify following the policy of working on the basis of acceptance, if one hardly has gathered information or made an effort to know how one's organisation is perceived by all relevant stakeholders? The Review Team feels that there is room for organisations to improve their communications and interaction with affected populations and other stakeholders on humanitarian activities. This might also counterbalance the impact of perceptions

of partnerships between the military and humanitarian organisations. In addition, humanitarian organisations may need to revisit their low-profile mode to ensure their identity is well-understood.

Another aspect critical for preserving their humanitarian identity is more openness and transparency from agencies on their decision-making. Finding it challenging to implement the principles is not something to be ashamed of – instead, these challenges need to be discussed and reflected on from a collective point of view. Rather than attempting to formulate 'red lines', it would be worth an effort to develop potential consensus on points on negotiating positions. For example, based on the assistance and protection elements of the principle of humanity, one should only work in camps that are detention facilities if the assistance programme is combined with humanitarian protection work (e.g. silent diplomacy or public messages on the need to observe the IDPs' human rights).

Finally, with decades of humanitarian work in Iraq, the Review Team finds it is striking that the importance and incorporation of the core principles in the work of humanitarian organisations is only reviewed now, at the initiative of one donor. This is all the more the case given the centrality of armed conflict in the contemporary global humanitarian landscape. While this review may be long overdue, it is hoped that it will become a leading example for other donors and organisations wanting to invest in more effective humanitarian response in armed conflict, not only in Iraq, but worldwide.

Recommendations

ECHO partners should:

- Demonstrate that principled humanitarian action includes ongoing reflection on the possible competing demands of the four core principles. This can be done by organising regular discussions and as part of the reporting process. There are no universally right or wrong ways in which to operationalise the principles, but bearing the principles in mind in the decision-making process makes for principled action in itself. The extent to which the principles have been borne in mind needs to be communicated clearly to stakeholders impacted by the decision.[17]

WITH DECADES OF HUMANITARIAN WORK IN IRAQ, IT IS STRIKING THAT THE IMPORTANCE OF THE INCORPORATION OF THE CORE PRINCIPLES IN THE WORK OF HUMANITARIAN ORGANISATIONS IS ONLY REVIEWED NOW AT THE INITIATIVE OF ONE DONOR.

17   During its visit, one of the organisations part of sample provided the Review Team with a document providing some

- Create, or maintain, a space for internal and external dialogue and coordination regarding the humanitarian principles. Principled humanitarian action does not mean working according to static dogmas. On the contrary: the operationalisation of the humanitarian principles is highly context-specific, and their application needs to be constantly re-evaluated on a case-by-case basis. As part of the standard practice in humanitarian coordination mechanisms, including the clusters, inter-cluster mechanism, and HCT, organisations should share and discuss their views and explain their terms of engagement based on the principles.

- Reduce self-imposed barriers in reaching civilians in need in areas that until now have been labelled as 'hard to reach'. This label should be revisited as a matter of priority and, if it is to be used, criteria should be defined for the qualification, which should be reviewed regularly. Relevant bodies, such as OCHA or NCCI should develop a dynamic list of such areas with their members or partners. There is also an urgent need to invest in activities that contribute to realising access, such as developing contacts at check points and networking, gathering and analysing context-related information, and devising strategies for access negotiations. Allocating more resources for providing both local and international staff with training and support to implement principled humanitarian action should also be pursued. Humanitarian organisations may be well-served by looking at the findings of various studies, including the SAVE materials, MSF's reports on the emergency gap, and the forthcoming version of the Stay and Deliver report, which have created a momentum for renewed attention and serious investments in this regard.

- Recognise that risk management is an inherent feature of humanitarian action. Any risk management framework would need to explicitly address the humanitarian principles, for example, in terms of a list of questions or considerations that should be taken into account in decision-making.[18] The risk of compromising the humanitarian principles should be balanced alongside security and fiduciary risks.

- Exercise greater caution in using the 'humanitarian imperative' as an unbreakable justification to provide aid in highly complex environments. Where compelling reasons exist for choosing to give precedence to providing humanitarian assistance which renounces some degree of neutrality and independence, this should be explicitly acknowledged and discussed, not just implicitly understood.

- Establish strong accountability mechanisms, and reinforce those that already exist, but also invest (more) resources in understanding and managing the perceptions of humanitarian aid among the variety of stakeholders as part of the policy of acceptance, including, in particular, affected populations. Actions to manage and measure such perceptions include for example sharing information on the organisations' background and motivations and, as deemed appropriate, developing a more visible profile, and seeking feedback through interactive communications with all stakeholders.

Coordinating entities and bodies in Iraq (including OCHA, NCCI, the HC and the HCT) should:

- Strengthen humanitarian coordination by making the principles an even more explicit part of strategic processes, such as the Humanitarian Response Plan (HRP). In the annual process of reviewing the implementation of the HRP, there should be a (written) report and reflection on the trends in humanitarian negotiations in Iraq. In parallel to the humanitarian needs assessment(s), coordinating bodies should be responsible for developing and maintaining an assessment of the key gaps in, or challenges to, principled humanitarian action. This assessment must be context-specific and include evidence based on perception studies, potential mitigation efforts and action points for improvement. Coordination mechanisms should also include questions on acceptance and engagement in their plans and discussions on accountability to affected populations.

- Consider further developing peer review among partners and members, for example along the lines of the IASC OPR, and documenting examples and good practices in (member) organisations' operations regarding principled humanitarian action.

ECHO in particular, and the donor community in general (including UN agencies when acting as

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insight into how it applies the principles. It had shared this publication with a selected audience.

18   A next step could be to develop such a list based on organisations' input.

donors) should:

- Enable organisations to make investments in risk management strategies and measures that seek to increase access, especially including expanding levels of senior or international staff.

- Incorporate into reporting mechanisms elements that allow assessment of a partner's engagement with regard to the principles (e.g. documentation of compromises, mitigating steps taken, etc.).

- Be careful to avoid supporting implementing partners who do not have an eye for all four principles. Ask partners to report specifically on the way in which they interpret the principles and how they see their action as principled, not only in their proposals, but also in their subsequent programme reports.

- Improve donor coordination and consider creating a donor contact group or similar mechanism that looks at principled humanitarian action in Iraq and also serves as a mechanism for rotating donors' representation in the HCT. The principle of impartiality is particularly relevant in this regard as donors should realise that through coordinating their funding decisions they can make positive contributions in responding to unmet needs in areas where humanitarian presence is too thin.

- Continue to emphasise donor involvement by establishing and strengthening relationships on the ground with humanitarian organisations that provide principled humanitarian action. Donor representatives who have limitations to move around in Iraq should benefit from ECHO's wide network and ability to travel.

IT IS HOPED THAT THIS REVIEW WILL BECOME A LEADING EXAMPLE FOR OTHER DONORS AND ORGANISATIONS WANTING TO INVEST IN MORE EFFECTIVE HUMANITARIAN RESPONSE IN ARMED CONFLICT, NOT ONLY IN IRAQ, BUT WORLDWIDE.

6
References

- ADE & Humanitarian Futures. (2014). *Evaluation of the Implementation of the European Consensus on Humanitarian Aid - Final Report.* ECHO/ADM/BUD/2013/01203.
- Bridges, K. (2010). *Between Aid and Politics: Diagnosing the Challenge of Humanitarian Advocacy in Politically Complex Environments – The Case of Darfur, Sudan.* Third World Quarterly, 31(8), 1251-1269.
- Buth, P. (2017). *Insecurity – always an insurmountable obstacle?* Emergency Gap Series 05, Médecins Sans Frontières.
- Collinson, S., & Duffield, M. (2013). *Paradoxes of Presence: Risk Management and Aid Culture in Challenging Environments.* London: Humanitarian Policy Group, Overseas Development Institute.
- Collinson, S., & Elhawary, S. (2012). *Humanitarian Space: A Review of Trends and Issues.* HPG Report 32.
- Donini, A. (2012). *The Golden Fleece: Manipulation and Independence in Humanitarian Action.* New York; London: Kumarian.
- DuBois, M. (2016). *The Cost of Coherence.* Emergency Gap Series 04, Médecins Sans Frontières.
- ECHO. (2016). *Humanitarian Implementation Plan (HIP), Iraq Crisis, Version 5.*
- ECHO. (2017). *Humanitarian Implementation Plan (HIP), Iraq, Version 1.*
- Egeland, J., Harmer, A., & Stoddard, A. (2011). *To Stay and Deliver - Good Practice for Humanitarians in Complex Security Environments.* Office for the Coordination of Humanitarian Affairs.
- FDFA, CDI. (2014). *Humanitarian Access in Situations of Armed Conflict, Practitioners' Manual, Version 2.* Swiss Federal Department of Foreign Affairs (FDFA), Conflict Dynamics International (CDI) .
- Hansen, G. (2007). *Coming to Terms with the Humanitarian Imperative in Iraq. Humanitarian Agenda 2015 Briefing Paper.* Feinstein International Center.
- Haver, K., & Carter, W. (2016). *What It Takes: Principled Pragmatism to Enable Access and Quality Humanitarian Aid in Insecure Environments, Report from the Secure Access in Volatile Environments Research Programme: SAVEresearch.net.* Humanitarian Outcomes.
- HERE. (2015). *The Universality and Application of Values and Principles Underpinning Humanitarian Action. Report on the Working Meeting held on 13 October 2015.* Geneva: HERE-Geneva.
- Hilhorst, D., & Pereboom, E. (2016). *Multi-mandate Organisations in Humanitarian Aid.*
- Dans Z. Sezgin, & D. Dijkzeul, *The New Humanitarians in International Practice – Emerging Actors and Contested Principles* (pp. 85-102). London; New York: Routledge.
- Humanitarian Outcomes/GPPi. (2016). E*nabling Access in Volatile Environments - Annexes.* Humanitarian Outcomes.
- IASC. (2015). *Operational Peer Review - Response to the Crisis in Iraq.*
- Leader, N. (2000). *The Politics of Principle: The Principles of Humanitarian Action in Practice, Report 2.* London: Humanitarian Policy Group, Overseas Development Institute.
- Macdonald, I., & Valenza, A. (2012). *Tools for the Job: Supporting Principles Humanitarian Action.* Commissioned by Norwegian Refugee Council and Humanitarian Policy Group. London: Overseas Development Institute.
- Magone, C., Neuman, M., & Weissman, F. (2011). *Humanitarian Negotiations Revealed: The MSF Experience.* Centre de Réflexion sur l'Action et les Savoirs Humanitaies, C. Hurst & Co. Ltd.
- NRC/Handicap International. (2016). *Challenges to Principled Humanitarian Action: Perspectives from four countries.* Geneva: Norwegian Refugee Council & Handicap International.
- OCHA. (2017). Humanitarian Response Plan, Iraq .
- Schenkenberg van Mierop, E. (2016). *Coming Clean on Neutrality and Independence: The Need to Assess the Application of Humanitarian Principles.* International Review of the Red Cross, vol. 97 (897/898), 295–318.
- Schreter, L., & Harmer, A. (2013). *Delivering Aid in Highly Insecure Environments – A Critical Review of the Literature 2007-2012.* Humanitarian Outcomes.
- Slim, H. (1997). *Relief Agencies and Moral Standing in War: Principles of Humanity, Neutrality, Impartiality and Solidarity.* Development in Practice, 7(4), 342-352.
- Slim, H. (2000). *Dissolving the Difference Between Humanitarianism and Development: The Mixing of a Rights-Based Solution.* Development in Practice, 10(3-4), 491-494.
- Slim, H. (2002). *Claiming a Humanitarian Imperative: NGOs and the Cultivation of Humanitarian Duty.* Refugee Survey Quarterly, 113-125.
- Stoddard, A., Haver, K., & Czwarno, M. (2016). *NGOs and Risk - How International Humanitarian Actors Manage Uncertainty.* Humanitarian Outcomes/Interaction.
- Streets, J., Reichhold, U., & Sagmeister, E. (2012). *Evaluation and Review of Humanitarian Access Strategies in DG ECHO Funded Interventions.* Berlin: Global Public Policy Institute (GPPi).
- Svoboda, E. (2015). *Strengthening Access and Proximity to Serve the Needs of People in Conflict.* London: Humanitarian Policy Group, Overseas Development Institute.
- Weiss, T. (1999). *Principles, Politics, and Humanitarian Action.* Ethics and International Affairs, 13(1), 1-22.

7
Annexes

Annex 1
Terms of Reference

Evaluation Terms of Reference
NRC, Iraq

Country: Iraq
Duration: December 2016 to February 2017
Reporting to: Evaluation Steering Committee comprised of ECHO partner representatives and NCCI representatives.

1.   BACKGROUND INFORMATION

Background on the context
Most humanitarian donors recognise that humanitarian principles should lie at the heart of any response, particularly in situations of armed conflict. These principles are enshrined in the 'European Consensus on Humanitarian Aid' adopted by the institutions of the European Union (EU) and the Member States in December 2007. In Iraq as much as in other countries, international donors, including ECHO, are confronted with numerous challenges to the consistent application of humanitarian principles. Principled humanitarian action is overshadowed by a multitude of political and military priorities. Similarly, UN and INGOS to a lesser extent face a multitude of pressures thereby confining humanitarian action to certain areas, while visibility and understanding of humanitarian needs in areas outside where access has been attained, is curtailed, hampering impartial humanitarian coverage and needs based humanitarian responses.

2.   PURPOSE OF EVALUATION AND INTENDED USE

The objective of ECHO's action is to uphold principled humanitarian action in Iraq, in order to ensure humanitarian access to populations in need of assistance and the populations' access to humanitarian assistance. To achieve this objective, this project will evaluate the extent to which ECHO's humanitarian partners have incorporated the humanitarian principles at two levels: (a) programme strategy; and (b) the implementation of programmes/projects at the field level. The findings will be presented for the use of the participating partners and presented and shared at the NCCI-led Access Task Force in February for feedback and inputs. Any findings of the Access Task Force prior to the evaluation findings should equally support the evaluation to ensure is informed by a wide range of NGOs, and lessons learnt from previous experiences via the Access Task Force.

3.   SCOPE OF WORK AND LINES OF INQUIRY

Lines of enquiry
The evaluation should focus on the key humanitarian principles: humanity, neutrality, impartiality and independence that provide the foundations for the humanitarian actions. The evaluation will cover as much as possible the last two years of implementation. The evaluation will look to answer the following questions: • to what extent does the organisation's programme strategy reflect the humanitarian imperative to address the most significant needs; • how has the organisation incorporated the need to obtain and secure access as part of its humanitarian programme;

- how has the assistance been perceived by the beneficiaries with regard to humanitarian principles and if there are differences in perceptions among different stakeholders in comparison with the beneficiaries;
- to what extent does the organisation aim to preserve its humanitarian identity;
- is there any evidence of the direct link between an organisations identity and its ability to access areas outside of government control, or hard to reach areas;
- map any gaps and suggest corrective measures;
- and how has ECHO's strategy and decisions as a donor impacted partners' willingness and ability to mainstream the humanitarian principles.
- Equally, the evaluation will seek to map the different obstacles and challenges currently faced by aid actors trying to reach people in need of assistance in Iraq in relation to the implications of lack of understanding of and/or respect for the humanitarian principles among local and national actors; and seek to comprehend the local/ national actors' perception of humanitarian actors and their modus operandi in relation to the humanitarian principles.

4. METHODOLOGY

To answer the evaluation questions, NRC would like the evaluator/evaluation team to submit a proposal with study design and methodology, which focuses on participatory and qualitative methods to assess the key humanitarian principles. In particular, we are seeking an evaluator with demonstrable experience of similar evaluations.

As a minimum, the methodology should include a desk review of key documents, including analysis of existing quantitative data, semi-structured interviews with key informants (INGOs staff, NGOs staff, different types of beneficiary group leaders, etc.), focus group discussions with beneficiaries and methods to seek the views and perceptions of various stakeholders including the beneficiaries.

Geographical area of coverage should assess the different humanitarian approaches applied in different geographical areas considering different level of coherence with humanitarian principles. The evaluation will focus on ECHO partners and their local/national partners.

5. EVALUATION FOLLOW UP AND LEARNING

The preliminary findings will be presented to the participating partners (including local/ national partners) for feedback and inputs. Any findings of the Access Task Force prior to the evaluation findings should equally support the evaluation to ensure is informed by a wide range of NGOs, and lessons learnt from previous experiences via the Access Task Force.

The findings will be presented for the use of the participating partners and shared at the NCCI-led Access Task Force in February.

The evaluation findings will equally be presented to a wider audience through workshops and events.

6. EVALUATION PRINCIPLES

The views expressed in the report shall be the independent and candid professional opinion of the evaluator, and the evaluation should be conducted in a transparent and independent manner. The evaluation will be guided by the following ethical considerations:

- Openness - of information given, to the highest possible degree to all involved parties
- Confidentiality and data protection - measures will be put in place to protect the identity of all participants and any other information that may put them or others at risk.
- Public access - to the results when there are not special considerations against this
- Broad participation - the relevant parties should be involved where possible
- Reliability and independence - the evaluation should be conducted so that findings and conclusions are correct and trustworthy

7.   COORDINATION AND MANAGEMENT OF THE EVALUATION

The evaluator/evaluation team will be supported by Steering Committee and Reference Group.

The Steering Committee comprised of ECHO partner representatives and NCCI representatives will oversee administration and overall coordination, including monitoring progress of the evaluation. The main functions of the Steering Committee will be:
to establish the Terms of Reference of the evaluation;
*   select external evaluator(s);
*   review and comment on the inception report and approve the proposed evaluation strategy;
*   ensure the study is carried out as agreed in the final inception report;
*   review and comment on the draft evaluation report;
*   establish a dissemination and utilization strategy.
*   ECHO specifically to organize the launching of the process, inform their partners and larger stakeholders, and NRC to provide logistical support.
*   The main functions of the Reference Group are:
*   to facilitate the gathering of data necessary for the evaluation;
*   to participate in the validation of evaluation findings, and to ensure that they are factually accurate;
*   to act on the relevant recommendations.

8.   DELIVERABLES AND REPORTING DEADLINES

The evaluator will submit three reports and two presentations; the deadlines to be agreed with the consultant.

*   Inception report: Following the desk review and prior to beginning fieldwork, the consultant will produce an inception report subject to approval by the Steering Committee. This report will detail a draft work plan with a summary of the primary information needs, the methodology to be used, and a work plan/schedule for field visits and major deadlines. With respect to methodology, the consultant needs to provide a description of how data will be collected and a sampling framework, data sources, and drafts of suggested data collection tools such as questionnaires and interview guides, preferably against the research questions (not generically stated). Once the report is finalised and accepted, the consultant must submit a request for any change in strategy or approach to the Steering Committee. First draft inception report is due by COB xx and final version submitted no later than COB xx.

*   Draft evaluation report: A draft evaluation report needs to be submitted to the Steering Committee no later than COB xx with a presentation on key findings; feedback will be provided to the evaluator by COB xx.

*   Final evaluation report: The final evaluation report will follow NRC's standard template for evaluation reports, which will be shared with the evaluator at the beginning of the consultancy. Submission is due xx to the Steering Committee.

*   Presentation to ECHO, ECHO's partners, NCCI members and relevant stakeholders

All material collected in the undertaking of the evaluation process shall be submitted to the Chair of the Steering Committee prior to the termination of the contract. The language used for the deliverables will be English.

9.   TIMEFRAME & BUDGET

Proposal should present a budget for the number of expected working days over the entire period between December to February covering development of inception report, tools, planning and conducting fieldwork, analysis and reporting.

The evaluator/ team lead is expected to provide a suggested timeline and work plan for the evaluation based on these scheduling parameters and in keeping with the scope of the evaluation questions and criteria.

In event of serious problems or delays, the evaluator/ team leader should inform the Steering Committee immediately. Any significant changes to review timetables need to be approved by the Steering Committee in advance.

10.   EVALUATION CONSULTANT

NRC seeks expressions of interest from individuals/teams, ideally with the following skills/ qualifications and expertise:
- 10+ years of experience with working in humanitarian contexts (preferably in conflict zones) in a senior management position.
- Sound and proven experience in conducting evaluations based on OECD-DAC evaluation criteria, particularly utilisation and learning focused evaluations
- Extensive experience of theories of change and how they can be used to carry out evaluations
- Expertise in participatory qualitative data collection techniques
- Background in International Humanitarian Law
- Good knowledge of humanitarian affairs
- Humanitarian principles training background
- Experience with similar evaluations

Necessary Skills:
- Fluency in written and spoken English is required; Arabic highly desirable
- Extensive experience working in conflict zones, prior experience in the Middle East, preferred
- Proven experience of managing evaluations of humanitarian projects
- Experience of designing qualitative data collection methods, of managing participatory and learning focused evaluations and analytical skills
- Excellent team work and communication skills, flexibility and good organisational skills

11.   APPLICATION PROCESS AND REQUIREMENTS

Application deadline: Close of day xx.

Interview dates, if required: between xx.

Bids must include the following:
- Cover letter: stating candidate skill and experience suitable for the consultancy (max 1 page)
- Outline of evaluation framework and methods, proposed timeframe, work plan and budget (max 3 pages; bids over limit will be automatically excluded).
- CV of proposed individual/s and one piece of evidence of similar evaluation carried out previously (abbreviated is adequate though we may ask for more text if what is submitted is not indicative of work performed).
- Submit completed bids to xx by COB xx.

Annex 2
Review Matrix

The following table provides an overview of how the analytical framework relates to the lines of enquiry (both those in the ToR, and those specifically added by the Review Team).

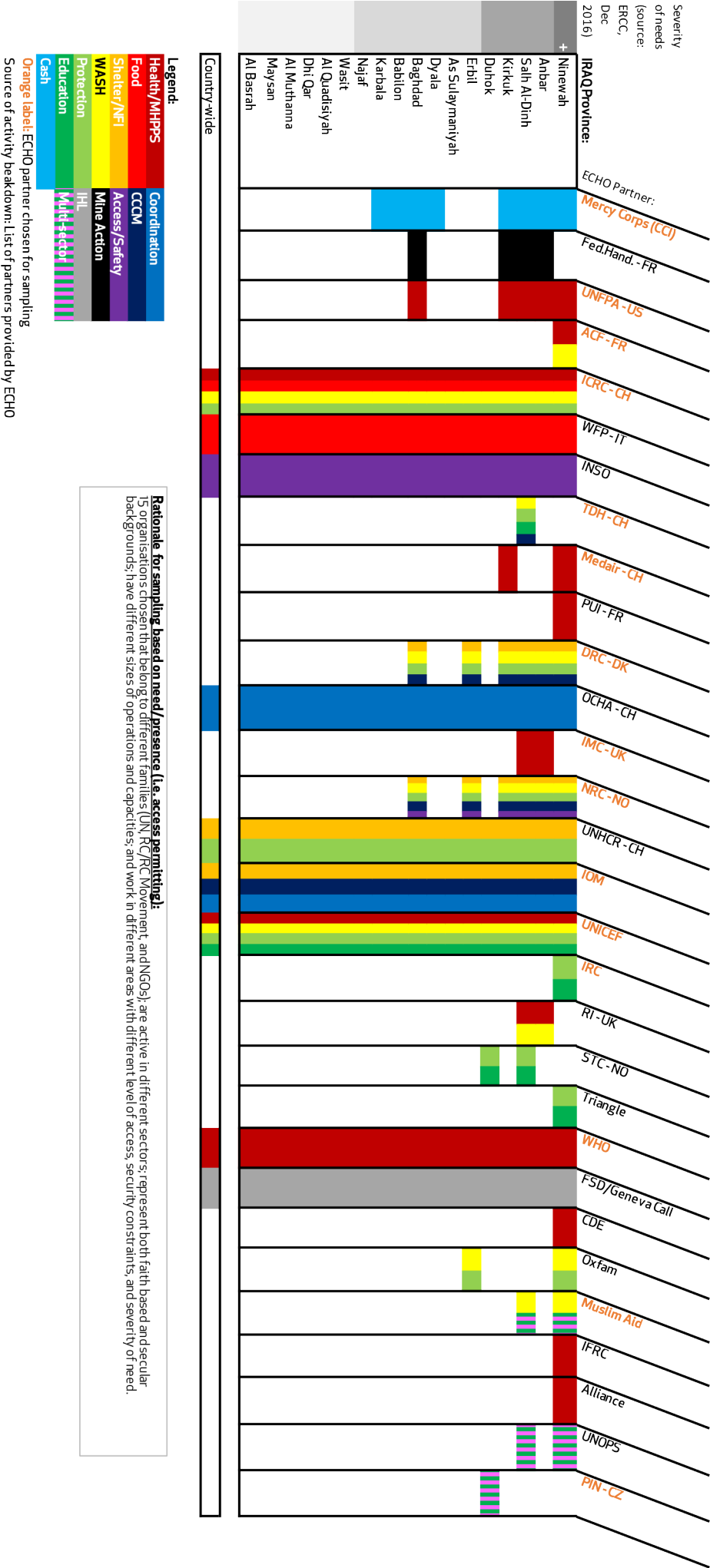| Analytical dimension			Lines of enquiry *(italics = lines of enquiry from ToR)*	Data collection
1. Main-streaming of humanitarian principles	**A: Conceptually**	In ECHO strategy and decisions	✓ How is mainstreaming of humanitarian principles framed in ECHO's strategy and decisions	Desk review/ document analysis
		In ECHO partner strategy and decisions	✓ How is mainstreaming of humanitarian principles framed in ECHO partners' strategy, decisions, reporting, and accountability mechanisms? ✓ Does ECHO encourage, monitor and/or assess principled behaviour, and if so, how? ✓ Do humanitarian principles guide the development of internal policies and decision-making related to securing and sustaining access (including prioritising options for access)?	Desk review/ document analysis Focus Group with partner representatives OR semi-structured interviews, as appropriate
		In other donors' strategy and decisions	✓ How is mainstreaming of humanitarian principles framed in other donors' strategy and decisions? ✓ Do humanitarian principles guide the development of internal policies and decision-making related to securing and sustaining access (including prioritising options for access)?	Desk review & semi-structured interviews (including with other donors)
	B: Practically	In ECHO partner programmes	✓ How is mainstreaming of humanitarian principles seen in ECHO partners' programme/ project implementation? ✓ Are humanitarian principles used to weigh potential costs and benefits of taking certain actions related to securing and sustaining access? ✓ Are the humanitarian principles used to externally communicate the organisations motivation, objectives, and ethos?	Focus Group with partner representatives OR semi-structured interviews, as appropriate OR semi-structured interviews, as appropriate
2: Humanitarian Identity	A: Humanity	Needs-based assistance and protection	✓ To what extent are humanitarian access and activities motivated by needs and protection? (To what extent does the motivation reflect the humanitarian imperative to address the most significant needs?)	Desk review Semi-structured interview

		Efforts to negotiate access and presence to enhance the wellbeing of civilian populations without making them targets of violence	✓ *How has the organisation incorporated the need to obtain and secure access as part of its humanitarian programme?* ✓ How are dignity and rights of all human beings respected/protected when securing and sustaining access?	
		Commitment to communicating with affected communities	✓ How has the organisation devised its communication/interaction with affected communities? ✓ How are affected populations involved in the different stages of the organisation's humanitarian work?	Desk review Semi-structured interview Survey grid
	B: Impartiality	Assistance to people most in need	✓ On what basis does the organisation choose which population to access and assist? *(To what extent does the organisations programme strategy reflect the humanitarian imperative to address the most significant needs?)* ✓ At what level does the organisation decide "most in need" (country-wide; within the selected project area.) ✓ Through which means does the organisation identify those "most in need"? (To what extent does the organisation identify those "most in need" using objective, non-biased, and fact-based means?) ✓ Does the organisation representative perceive that the organisation does indeed in fact assist those most in need?	Desk review Semi-structured interview Survey grid
		Non-discrimination	✓ To what extent does the organisation programme strategy address non-discrimination? ✓ Does the organisation representative perceive that the organisation does indeed work in a non-discriminatory manner? How?	Desk review Semi-structured interview
	C: Neutrality	Political engagement or not?	✓ Does the organisation take sides in controversies of a political, religious, or ideological nature? ✓ Is advocacy and public positioning is based on factual data and information, and does it addresses all parties to the conflict even-handedly (recognising that culpability may not be evenly distributed)? ✓ Are humanitarian negotiations are conducted independently of political processes (e.g. ceasefire negotiations)? ✓ Do practitioners engage with any and all actors with influence on access and/or target population well-being?	Desk review Semi-structured interview

		Perceptions	✓ Do the organisation representatives know how their organisation perceived by other stakeholders in situations of armed conflict? (How and how often, if at all, do the organisations gauge the perception of their organisation by other stakeholders) ✓ Are armed guards/escorts used, and if so, to what extent does the organisation representative believe this has a negative impact on the perception of neutrality? And if so, what, if any, measures has the organisation taken to reduce the possible negative impact of this action on the perception of neutrality?	Semi-structured interview
		Balancing neutrality with other principles	✓ Would the organisation representative say that the principle of neutrality is absolute, or can it be compromised? If so, how, when and why? Examples?	Semi-structured interview
	D: Independence	Institutional and political independence	✓ What can be said about the organisation's relationship to political institutions in Iraq? Elsewhere? ✓ To what extent would the organisation representative say that the organisation is institutionally/politically independent/ dependent?	Semi-structured interview Partner survey grid
		Financial independence	✓ What can be said about the organisation's relationship to ECHO? Other donors? ✓ To what extent would the organisation representative say that the organisation is financially independent/dependent? How and why? What are the practical implications of this for their work?	Semi-structured interview Partner survey grid
		Operational independence	✓ What can be said about the organisation's relationship with partners; local/regional/ international? ✓ To what extent would the organisation representative say that the organisation is operationally independent/dependent? How and why? What are the practical implications of this for their work? ✓ Does the organisation retain operational control and direction of activities related to securing and sustaining access?	Semi-structured interview Partner survey grid
3: Challenges/ obstacles faced reaching people in need	A: Types of obstacles	Internal factors (staffing, logistics, organisational culture)	✓ What do partner representatives perceive to be the main internal obstacles to reaching people in need of assistance?	Focus Group with partner representatives AND/OR semi-structured interviews, as appropriate OR semi-structured interviews, as appropriate
			✓ How are internal obstacles to reaching people in need of assistance overcome?	Semi-structured interview

		External factors (structural and contextual particularities, synergies)	✓ What do partner representatives perceive to be the main external obstacles to reaching people in need of assistance?	Focus Group with partner representatives AND/OR semi-structured interviews, as appropriate OR semi-structured interviews, as appropriate
			✓ How are external obstacles to reaching people in need of assistance overcome?	Semi-structured interview
	B: Practical examples		✓ Is the partner representative aware of any particular example where the humanitarian identity was a factor (negative or positive) in reaching people in need?	Semi-structured interview
4: Perceptions	A: By beneficiaries		✓ *Comprehend the local/national actors' perception of humanitarian actors and their modus operandi in relation to the humanitarian principles* ✓ How has the assistance been perceived by the beneficiaries with regard to humanitarian principles? ✓ To what extent do beneficiaries feel that ECHO partners have communicated directly to them on their principles/explained their position vis-à-vis the principles? ✓ To what extent do beneficiaries feel that the humanitarian work of ECHO partners responds to their greatest need?	Small survey among beneficiaries
	B: By stakeholders		✓ *How is the organisation and its activities perceived by the representatives of the partner organisations in regard to humanitarian principles?* ✓ *Do authorities and other local actors recognise the organisations for their humanitarian identity? What does this mean for them? Do they recognise differences in terms of identity and ways of working of the various organisations?*	Focus Group with partner representatives AND/OR semi-structured interviews, as appropriate OR semi-structured interviews, as appropriate
Cross-cutting analysis			✓ *To what extent does the organisation aim to preserve its humanitarian identity?* **(Link analytical dimensions 1 and 2)** ✓ *Are there differences in perception among different stakeholders in comparison with the beneficiaries?* **(Link analytical dimensions 4A and 4B)** ✓ *Is there any evidence of the direct link between an organisations identity and its ability to access areas outside of government control, or hard to reach areas?* (Link analytical dimensions 2 and 3)	As above

			✓ *Map gaps and suggest corrective action* (Link all analytical dimensions) ✓ *How has ECHO's strategy and decisions as a donor impacted partners' willingness and ability to mainstream the humanitarian principles?* (Link analytical dimensions 1A, 1B and 1C) ✓ *Map different obstacles and challenges currently faced by aid actors trying to reach people in need of assistance in Iraq in relation to the implications of lack of understanding of and/or respect for the humanitarian principles among local and national actors* (Link analytical dimensions 2 and 3)	

■ Annex 3
Table for sampling

Severity of needs (source: ERCC, Dec 2016)

IRAQ Province:

- Ninewah +
- Anbar
- Salh Al-Dinh
- Kirkuk
- Duhok
- Erbil
- As Sulaymaniyah
- Dyala
- Baghdad
- Babilon
- Karbala
- Najaf
- Wasit
- Al Quadisiyah
- Dhi Qar
- Al Muthanna
- Maysan
- Al Basrah

Country-wide

ECHO Partner:

- Mercy Corps (CCI)
- Fed.Hand. - FR
- UNFPA - US
- ACF - FR
- ICRC - CH
- WFP - IT
- INSO
- TDH - CH
- Medair - CH
- PUI - FR
- DRC - DK
- OCHA - CH
- IMC - UK
- NRC - NO
- UNHCR - CH
- IOM
- UNICEF
- IRC
- RI - UK
- STC - NO
- Triangle
- WHO
- FSD/Geneva Call
- CDE
- Oxfam
- Muslim Aid
- IFRC
- Alliance
- UNOPS
- PIN - CZ

Legend:

Health/MHPPS	Coordination
Food	CCCM
Shelter/NFI	Access/Safety
WASH	Mine Action
Protection	IHL
Education	Multi-sector
Cash	

Orange label: ECHO partner chosen for sampling
Source of activity breakdown: List of partners provided by ECHO

Rationale for sampling based on need/presence (i.e. access permitting):
15 organisations chosen that belong to different families (UN, RC/RC Movement, and NGOs); are active in different sectors; represent both faith based and secular backgrounds; have different sizes of operations and capacities; and work in different areas with different level of access, security constraints, and severity of need.

■ Annex 4
Document analysis codebook

Analytical Dimension	Code	Description
Mainstreaming of humanitarian principles	Specific discussion re principles	Specific section/document provided re principles
	Humanitarian principles	Use of word(s) (when mentioned as a concept in bulk)
	Principles as guidance	Use of principles to guide internal policies
	Principles are operational tools	Use of principles to guide practice
	Principles can be compromised	View in regard to possibilities of compromising principles
	Principles cannot be compromised	View in regard to possibilities of compromising principles
	Link principles and access	Link between humanitarian principles and access policies
	Link principles and risk management	Link between humanitarian principles and risk management policies
Humanitarian identity: humanity	Humanity	Use of word(s)
	Humanitarian imperative	Use of word(s)
	(Human) Dignity / Respect	Use of word(s)
	Rights (of all human beings)	Use of word(s)
	Needs /protection motivation	Link between needs/protection and access/activities
	Access in programme	The need to obtain and secure access is specifically highlighted in programme
	Communication APs	Commitment shown to communicate with affected communities
	APs involved	Thorough explanation of how affected populations are involved in work/affected populations are said to be involved at many/all stages of the work.
Humanitarian identity: impartiality	Impartiality	Use of word(s)
	Most (in need / vulnerable…)	Use of word(s)
	Non-discrimination	Use of word(s)
	Most in need is basis	Mention of most significant needs as basis for choice as to who to assist / Prioritisation of highly vulnerable. Includes risk and vulnerability.
	Objective definition of most in need	Explanation given as to how to define most in need using objective/non-biased/fact-based means)
Humanitarian identity: neutrality	Neutrality	Use of word(s)
	Political engagement	Use of word(s)
	Advocacy	Use of word(s)
	Public positioning	Mention of partner organisation taking sides in a political, religious, ideological controversy.
	No political engagement	Mention that partner organisation does not take sides in a political, religious, ideological controversy.
	Factual basis for advocacy	Explanation that potential advocacy/public positioning is based on factual data and information, and addresses all parties to the conflict even-handedly.
	Independent humanitarian negotiations	Humanitarian negotiations are conducted independently of political processes (e.g. ceasefire negotiations)
	Cross-level engagement	Mention that practitioners engage with any and all actors with influence on access and/or target population well-being.
	Equality	reference to equality and inclusiveness; "equitable access" "give access to services for all and free of charge"; equal partners.
Humanitarian identity: independence	Independence	Use of word(s) / Includes also "independent" when referred to the organisation in its set-up
	Institutional/political independence	Use of word(s) (includes "instititionally"/"politically independent")
	Financial independence	Use of word(s) (includes "financially independent")
	Operational independence	Use of word(s) (includes "operationally independent")
	Operational access control	The partners organisation is said to retain operational control and direction of activities related to securing and sustaining access.

▪ Annex 5
Meeting schedule

Humanitarian Principles Review, Iraq, 27 Feb – 12 March
HERE-Geneva. Ed Schenkenberg and Karin Wendt

Date	Time	Location	Actor- Agency
Monday 27 Feb.	18:00	Kick-off meeting; Grand Palace Hotel Erbil.	ECHO / NRC
Tuesday 27 Feb.	8:30	Context briefing; ECHO office, Erbil.	ECHO
	10:00	Semi-structured interviews/FGD with 7 IOM staff; IOM office, Erbil.	IOM (ECHO partner)
	13:00	Semi-structured interviews with 2 TdH staff; TdH office, Erbil.	TdH (ECHO partner)
	15:00	Semi-structured interview; REACH office, Erbil.	REACH (non ECHO partner)
	18:00	Semi-structured interview; ACF office, Erbil.	ACF (ECHO partner)
Wednesday 1 March	8:15	Semi-structured interview; US consulate, Erbil.	OFDA/USAID
	9:30	Semi-structured interviews with 3 OCHA staff; UNAMI compound.	OCHA
	11:30	Semi-structured interview; JCC's office, Erbil.	JCC
	14:00	Semi-structured interview; Rotana Hotel, Erbil	DFID
	16:00	Semi-structured interview; INSO Office, Erbil.	INSO (ECHO partner not part of sample)
	17:30	Semi-structured interview; Skype.	IRC (ECHO partner)
Thursday 2 March	09:00	Semi-structured interviews with 3 Medair staff; Medair office, Erbil.	Medair (ECHO partner)
	11:00	Semi-structured interviews with 2 DRC staff; DRC office, Erbil.	DRC (ECHO partner)
	12:30	Semi-structured interview; Massara Health Association office, Atconz, Erbil.	MHA (Non-ECHO partner)
	14:00	Semi-structured interview; Mercy Corp office, Erbil.	Mercy Corps (ECHO partner)
	16:00	Semi-structured interviews with 2 IRC staff; IRC Office, Erbil.	IRC (ECHO partner)
Friday 3 March	13:00	Semi-structured interviews with 2 PIN staff; Grand Palace Hotel, Erbil	PIN (ECHO partner)
Saturday 4 March	12:00	Semi-structured interviews with 2 NRC staff; Grand Palace Hotel, Erbil.	NRC (ECHO partner)

Sunday 5 March	All day	Field visit: Qayyarah • Focus Group Discussion with 3 ICLA and 3 Cash out-of-camp beneficiaries at NRC Qayyarah office • Meeting with local authorities (Mukhtar; Director of Qayyarah courthouse; Director of police) • Focus Group Discussion (15 ppl) and mobile visits (4 ppl) in Jed'ah 3 camp • Mobile visits in Airstrip camp (6 ppl)	Facilitated by NRC
Monday 6 March	11:00 12:30	Semi-structured interview; NCCI office, Erbil Quality Assurance; Skype	NCCI Marc DuBois
Tuesday 7 March	All day	*Ed* – Field visit: Tikrit • Dujail, Salah Al Deen province Community event; reconciliation workshop between IDPs and host families. • Tikrit/Qadisiyah Compound GBV/HPF event (FGD with approx. 35 women) • Visit to "Dream City" IDP site in Tikrit; meeting with 10-15 IMC local staff • Visit MMU	Facilitated by IMC/DRC
	All day	*Karin* – Field visit: Bawiza • Meeting with local authorities (2 Public Distribution System Agents and Deputy Mukhtar) • FGDs with MHPSS beneficiaries (1 FGD with 4 women, and 1 FGD with 6 men)	Facilitated by ACF
Wednesday 8 March	14:00	*Karin*: Semi-structured interviews with 2 UNFPA staff, UNFPA office, Erbil	UNFPA (ECHO partner)
	15:30	*Karin*: Semi-structured interview, WHO office, Erbil	WHO (ECHO partner)
	11:00	*Ed*: Semi-structured interview, MSF-CH Office Baghdad	MSF-CH (non ECHO partner)
	14:00	*Ed*: Semi-structured interview, MSF-CH Office, Baghdad	Muslim Aid (ECHO partner)
Thursday 9 March	All day	Field visit; Kirkuk • Semi-structured interview with Hassan Waleed, MC • Meeting with local authorities (Manager of Civil Affairs Department, and Head of MODM) • FGD with 10 MC program beneficiaries (7 men; 3 women)	Facilitated by Mercy Corps
Friday 10 March	10:00	Semi-structured interview; ICRC office, Erbil.	ICRC (ECHO partner)
	14:00	Semi-structured interview; Humanitarian Relief Foundation office, Erbil.	HRF (non ECHO partner)
	15:30	Semi-structured interview; Grand Palace Hotel, Erbil.	Rise Foundation (non-ECHO partner)
Saturday 11 March	10:00	Semi-structured interview; Skype	UNICEF (ECHO partner)

	11:30	Semi-structured interview; Skype	HC
Sunday 12 March	10:00	End of mission briefing; ECHO office, Erbil	ECHO
	13:00	Semi-structured interviews with 2 UNHCR staff; Grand Palace Hotel, Grand Palace Hotel, Erbil.	UNHCR (ECHO partner, not sample)
Wednesday 15 March	9:00 (Gva time)	Semi-structured interview; Skype	IMC (ECHO partner)
Thursday 16 March	8:00 (Gva time)	Presentation of preliminary findings to Steering Committee	Steering Committee
Wednesday 22 March	8:00 (Gve time)	Semi-structured interview; Skype	BCF (non-ECHO partner)
	10:00 (Gva time)	Quality Assurance; Skype	Marc DuBois

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