Humanitarian Exchange
and Research Centre (HERE)

Addressing the Humanitarian Donor Accountability Gap?

Feasibility Study for an HRI 2.0

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HERE (Humanitarian Exchange and Research Centre) is an independent think-tank which has as its mission to contribute to closing the gap between policy and humanitarian practice.

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Executive summary

Between 2007 to 2011, the Humanitarian Response Index (HRI) provided an independent review of donor governments' performance against the Good Humanitarian Donorship (GHD) principles, offering a public measure of humanitarian donor accountability, and a common reference for debate on donors' humanitarian effectiveness. The Humanitarian Exchange and Research Centre (HERE) has engaged in a project to examine the feasibility of reviving the HRI. Carried out between October and December 2016, the Feasibility Study has involved a desk-review and semi-structured interviews with key stakeholders, and it has focused on three main areas of investigation, namely a review of the current humanitarian accountability environment, an analysis of the original strengths and weaknesses of the HRI, and suggestions for a future business model.

The HRI endeavoured to fulfil a double purpose: incite donors through benchmarking to correct policy deficiencies, and provide a platform for dialogue to help civil society at large increase pressure on individual donors. The reviews on whether the HRI achieved its purpose are somewhat mixed. The HRI did contribute in some cases to influence donor policies by evaluating their performance. This was especially in the case of smaller donors. It did not however leverage its findings towards a broader impact. What this may also seem to highlight is the fact that two objectives may have been competing at times.

An in-depth analysis of the current context has highlighted that there are several accountability initiatives in existence that need to be considered when deciding on whether there is a need for a revived HRI, and if so, what shape it would take. The feasibility of reviving the HRI requires consideration from two angles: *should* it be done (objective review) and *can* it be done (technical and operational review).

With regard to the objective review, it is noteworthy that because of its isolation, the original HRI did not take advantage of its opportunity to become a helpful platform for dialogue around the implementation of the GHD principles. In view of the attention now given by donors to the continually developing OECD/DAC Peer Reviews, this same need for an outside interpreter to the GHD is no longer there. Furthermore, while the brand new Grand Bargain commitments currently receive attention from donors, the humanitarian community is already seeing numerous discussions regarding a potential mechanism for measuring them. Overall, in today's environment, a single-organisation watchdog enterprise aiming to influence donor behaviour has its limits, especially if it lacks the buy-in of those targeted by the review itself.

Methodologically, the HRI was a very costly undertaking, both in terms of time and budgets, and from a technical and operational angle. It appears questionable whether reviving it in today's context can be done in a way where the efforts put in do not outweigh the possible benefits. For the HRI to be fully relevant in the current environment, it would need to undergo a number of changes. It would need to look beyond the GHD principles, while at the same time following a clearer focus and objective both internally and externally. It would also have to align with existing initiatives/mechanisms developing commonly accepted indicators for performance against commitments, and develop partnerships with other agencies/independent bodies monitoring the Grand Bargain commitments, to better identify complementarities. In terms of process, recognising that every system evolves naturally, the HRI would also have to integrate different approaches. While these changes would likely strengthen the relevance of an HRI-like exercise, it is also clear that a number of preconditions need to be in place for it to be worthwhile. First and foremost, enough buy-in would need to be built around both the usefulness of the exercise and its legitimacy. For the exercise to be operationally sustainable in the longer-term, unless it is based solely on publicly available information, enough 'access' to the donors under review will need to be established. Considering the risks of 'survey fatigue' which are likely to emerge out of

the many requests donors are already subject to and will likely be for the implementation of the Grand Bargain, and the different types of incentives donors are likely to respond to, this does not appear as a simple and realistic task in the short term.

While the idea behind the original HRI may still hold its validity – namely that of an independent donor watch-dog – there are a number of challenges in the operationalisation of this idea that mean that it is currently not a viable option for HERE. The mapping exercise of the current accountability environment does highlight a few possible options that could be explored as alternatives to a revision of the HRI, with the same ultimate goal of influencing the humanitarian system's performance. In particular, in light of HERE's own mission and comparative strengths, it is suggested to evaluate donor performance from angle that would also take into account broader systemic challenges to good humanitarian donorship.

An alternative to a revised HRI could be conceived as a more substantial endeavour to measure the impact of commitments, i.e. aiming to qualitatively assess whether donor commitments do in fact link to better aid, and if so, how. Not only would engaging in an effort to assess the links between commitments and results on the ground fit perfectly within HERE's mission of bridging policy and practice, but it would also be of direct relevance in terms of ensuring that the donors do not simply sign and live up to commitments for the sake of doing so, but that it actually has an impact when it comes to providing for a better humanitarian response.

List of abbreviations

ATI – Aid Transparency Index

CHS – Core Humanitarian Standard on Quality and Accountability

DARA – Development Assistance Research Associates

ECHO – European Commission Humanitarian Office

FTS – Financial Tracking Service

GHA – Global Humanitarian Assistance

GHD – Good Humanitarian Donorship

HAP - Humanitarian Accountability Project

HERE – Humanitarian Exchange and Research Centre

HRI – Humanitarian Response Index

IASC – Inter-Agency Standing Committee

IATI – International Aid Transparency Initiative

ICRC – International Committee of the Red Cross

IFRC – International Federation of the Red Cross

INGO – International Non-Governmental Organisation

OCHA – United Nations Office for the Coordination of Humanitarian Affairs

ODA - Official Development Assistance

OECD/DAC – Organisation for Economic Cooperation and Development/Development Assistance Committee

PWYF – Publish What You Fund

SOHS Report – State of the Humanitarian System Report

STAIT – Senior Transformative Agenda Implementation Team

UAE – United Arab Emirates

UK – United Kingdom

UNDP – United Nations Development Programme

UNHCR – United Nations High Commissioner for Refugees

UNICEF – United Nations International Children Emergency Fund

UNRWA - United Nations Relief and Works Agency for Palestine Refugees in the Near East

USA – United States of America

WPF – World Food Programme

1. Introduction

Government donors play a significant part in shaping the international humanitarian responses meant to address increasing humanitarian needs worldwide. They have also been at the forefront of initiatives to strengthen upwards accountability of operational humanitarian agencies. Yet, questions remain as to how much the donors themselves are being held to account for their policies, and the impact of their aid. Recent policy developments, sparked by the High-Level Panel on Humanitarian Financing suggestion for a Grand Bargain, and the outcomes of the World Humanitarian Summit further emphasise the need for public scrutiny of humanitarian donorship.

The Humanitarian Response Index (HRI) was published annually from 2007 to 2011, when it was suspended due to a lack of funding. The HRI provided an independent review of donor governments' performance against the Good Humanitarian Donorship (GHD) principles, offering a public measure of humanitarian donor accountability, and a common reference for debate on donors' humanitarian effectiveness. A 2012 HRI stakeholder survey indicated that a large majority of respondents valued positively the independent monitoring and evaluation of donor practice (DARA, 2012). In the belief that these results still hold true today, the Humanitarian Exchange and Research Centre (HERE) has engaged in a project to examine the feasibility of reviving the HRI.[1] Carried out between October and December 2016, the research for this Feasibility Study has focused on three main areas of investigation, namely a review of the current humanitarian accountability environment, an analysis of the original strengths and weaknesses of the HRI, and suggestions for a way forward.

This document provides the findings of the Feasibility Study. After a brief overview of the methodology used for the study in section 2, a review of the purpose, context, and achievements of the original HRI is provided in section 3. Section 4 then analyses the current context in light of the monitoring and evaluation of donor performance. Fulfilling the prime objective of the feasibility study, section 5 discusses the possibility of reviving the HRI in its original form. In view of the finding that such a revival is not a viable option in today's context, section 6 suggests an alternative way forward.

2. Feasibility study methodology

In view of capturing if and how the HRI could and should be revived, HERE has made use of qualitative research methods, collecting both primary and secondary data. Some primary data was retrieved from HRI documentation from the original HRI team, but most of it was collected through informal conversations with 19 selected key informants. The criteria informing the choice of the informants was based both on practical and theoretical considerations. The objective of the exercise was to gather 'food for thought' both from persons who were very familiar with the HRI (such as the instigators of the HRI, former HRI team-members, and members of its Peer Review Committee), and from stakeholders who did not necessarily have an in-depth knowledge of the HRI itself, but who were able to provide valuable input with regard to similar indexes and/or the current situation analysis (such as donor government representatives, the architects of the GHD principles, or stakeholders from other NGOs or international organisations working on humanitarian policy). Each conversation was adapted to the stakeholder in question, but all aimed to cover the following topics:

- **the current humanitarian accountability environment, and the perceived need for an "HRI2.0":** *Is there a need to review humanitarian donor commitments? Does the objective of the original HRI still gold true today, or are there new/additional considerations?*

[1] HERE would like to thank the Joffe Charitable Trust for generously providing financial support for this feasibility study.

- **the objectives, strengths, and weaknesses of the original HRI:** *For those familiar with the original HRI, what was its objective? What worked well with it, and what worked less well?*
- **suggestions for the approach of an "HRI2.0":** *What would the stakeholder like to see in a revised HRI? What could be the scope? What elements would be most helpful?*

Significantly, the informants were not approached formally in their representative capacities, but the aim of the interviews was simply to discuss in an informal manner potential ideas with persons having a specific knowledge of the sector.

Secondary data was gathered through a systematic desk-review aiming on the one hand to better understand the current donor accountability environment, and on the other to map donor commitments and existing monitoring mechanisms. The results from this review can be found principally in section 4 of this document, and in Annexes 4 and 5.

3. The context and purpose of the original HRI

Strengthening accountability, especially to crisis-affected populations, has been a major objective in humanitarian policy and practice since the late 1990s. In 2003, the member states of the Development Assistance Committee of the Organisation for Economic Cooperation and Development (OECD/DAC) came together to agree on a set of 23 principles, constituting the GHD initiative.[2] The 23 principles mix policy objectives and technical measures, and reaffirm the need for impartiality, neutrality, and independence in humanitarian assistance.[3] In 2007, the Madrid-based independent humanitarian evaluation and research organisation DARA conceived the HRI as a tool to measure how well humanitarian donors were performing relative to their GHD commitments. DARA team-members involved in the 2005 Tsunami Evaluation Coalition[4] had noted that donors – despite good intentions, and even with the GHD framework in place – often lacked guidance on how to coherently interpret 'good donorship'. DARA therefore introduced the HRI as "a unique attempt to benchmark donors and monitor progress in humanitarian action in relation to an initial baseline" (DARA, 2008, p. vii). The GHD Initiative was based on voluntary endorsements from donors, and in the absence of a binding legal obligation, the idea was that the HRI's benchmarking effort would contribute to more effective humanitarian action. The HRI would, on the one hand, help donors "examine their role critically" (DARA, 2008, p. vii), and, on the other hand, motivate them through peer pressure, to improve efficiency and correct policy deficiencies. It was hoped that the HRI would improve transparency and accountability in donor' policies and practices, and thereby allow for a better contextual understanding of the policy and operational barriers that affect effective implementation of good donorship. The HRI was also expected to promote an informed public debate and decision-making on humanitarian issues (DARA, 2009, p. 3).

The Methodology of the HRI

The HRI was published annually between 2007 and 2011, and its main outputs were individual assessments of each of the 23 OECD-DAC donors; a comparative ranking of the donors; contextual crisis reports analysing the donors' contributions in specific cases; thematic chapters and reports; and an overall analysis of strengths, weaknesses, and areas for improvement. From the outset, it was decided to focus the HRI on the humanitarian performance of the then 23 members of the OECD/DAC,[5] against

[2] See http://www.ghdinitiative.org/ghd/gns/home-page.html,
[3] See Annex 1 for a summary of the 23 GHD Principles.
[4] See http://www.alnap.org/TEC.
[5] These 23 members were Australia, Austria, Belgium, Canada, Denmark, the European Commission, Finland, France, Germany, Greece, Ireland, Italy, Japan, Luxemburg, the Netherlands, New Zealand, Norway, Portugal, Spain, Sweden, Switzerland, the United Kingdom, and the United States. Today, the Czech Republic, Iceland, Korea, Poland, the Slovak Republic, and Slovenia are also DAC members.

their commitment to the 23 GHD Principles. This choice was made as it was at the time "the only existing point of reference agreed to by donor governments on what constitutes good practice in humanitarian assistance", making it "an ideal framework to assess the depth and extent of governments' political commitment and accountability to support more effective humanitarian action" (DARA, 2010, p. 22).

The individual assessment of donor countries was seen as a crucial part of the study, "as too strong a focus on collective targets and assessments can result in free-riding that can seriously impede progress towards implementing the GHD commitments at the country operational level" (DARA, 2008, p. 7). The HRI was not conceived as an index on the volume or the quantity of funding provided by donors for humanitarian assistance. Its aim was to assess the quality and effectiveness of aid. The index was based on a combination of quantitative and qualitative research methodologies, meant to assess and benchmark the 23 donors against a number of indicators in line with the GHD principles. In all editions of the HRI, the indicators were organised into five pillars and weighted in accordance with their perceived differing importance.[6] The specific labels and contents of the pillars varied slightly across the first editions,[7] but since 2009, the five pillars were:

Pillar 1: **Responding to needs, 30% of the index weight** - Are donor responses based on needs of the affected populations, and not subordinated to political, strategic or other interests?

Pillar 2: **Prevention, risk reduction and recovery, 20% of the index weight** - Do donors support strengthening local capacity, prevention of future crises and long-term recovery?

Pillar 3: **Working with humanitarian partners, 20 % of the index weight** - Do donor policies and practices effectively support the work of humanitarian organisations?

Pillar 4: **Protection and international law, 15% of the index weight** - Do donors respect and promote International Humanitarian Law (IHL), and actively promote humanitarian access to enable protection of civilians affected by crises?

Pillar 5: **Learning and accountability, 15% of the index weight** - Do donors contribute to accountability and learning in humanitarian action? (DARA, 2010, p. 19)

The exact number and type of indicators were different from edition to edition.[8] For all five HRIs that were published, however, each pillar contained a set of qualitative and a set of quantitative indicators, weighted equally. The qualitative component was based on field research undertaken in a specific number of contexts, which varied from year to year, from 8 in 2007, up to 14 in 2010, and then down to 9 again in 2011 (see Annex 3). As part of the field research, the HRI teams interviewed senior representatives of humanitarian organisations, enquiring about the humanitarian response and the role of the donor governments that were supporting it. The field research also entailed a survey of donor practice. Respondents were asked for their opinions and perceptions – based on their direct experience of liaising with donors who supported their work – of how well donors were applying good practice in the crisis. The HRI teams also interviewed donor representatives, local authorities and civil society organisations, and – insofar as possible – beneficiaries of humanitarian assistance (DARA, 2010, p. 22). The quantitative component of the HRI was based on publicly available data, collected on donor

[6] The HRI 2007 highlighted that that "it should be stated unequivocally that the determination of weights is not a scientific process, but is based on consultation with stakeholders."

[7] See Annex 2 for an overview of the evolution of the HRI methodology between 2007 and 2011.

[8] As can be seen in Annex 2, HRI 2007 was based on 57 indicators (25 quantitative and 32 qualitative); HRI 2008 on 58 indicators (38 qualitative and 20 quantitative); HRI 2009 on 60 indicators (40 qualitative and 20 quantitative); and HRI 2010 and 2011 on 35 indicators (20 qualitative and 15 quantitative).

government funding and policies around humanitarian assistance. The information sources included, among others, the OCHA-FTS, the ECHO 14-point HAC system, OECD/DAC, World Bank, UNDP, IFRC, ICRC, UNHCR, UNICEF, WFP, UNRWA, and individual donors. All data was statistically analysed and converted into indicators "to construct the HRI scores and ranking for each of the donors assessed, and to generate a classification of donors based on their similarities and differences" (DARA, 2010, p. 23).

The HRI had a Peer Review Committee that provided technical, strategic, and moral support, and an Advisory Board that was conceived to help connect the HRI to the wider debate on humanitarian and global affairs. Each year, DARA reviewed the HRI methodology, and adjusted it to reflect developments on the humanitarian arena, and to improve the index design and analysis. In 2009, DARA undertook a more extensive review, consulting with approximately 50 key informants from governments, UN agencies, the Red Cross/Red Crescent movement, NGOs, and academics on their views of the GHD, and how to best measure their implementation. While the HRI 2007 and 2008 had focused exclusively on the individual ranking of the 23 OECD/DAC donors, the main innovation from the HRI 2009 onwards was to expand the analysis beyond the comparative ranking of the 23 OECD/DAC donors, to include a multi-dimensional analysis classifying donors into three groups: donors with a consistently high level of implementation of the GHD principles; donors with a mid-range level of implementation and donors with a lower level of implementation of the GHD principles. This grouping of donors was seen to provide a "more realistic benchmark of where donors stand in relation to their closest peers rather than the overall OECD/DAC group" (DARA, 2010, p. 23), allowing for a more holistic approach. The new approach was also seen as conducive to incorporating new donors (both governments and other funders) into the analysis, and indeed, as of 2009, the HRI analysis included some survey responses also from non-traditional donors, such as INGOs, UN agencies, and pooled funds. However, since the basic methodology had not been developed to include them, and since many of the GHD principles were not applicable to them, these non-traditional donors were not considered in the actual rankings.

The Review of the HRI after its first five years

In 2012, DARA engaged in a comprehensive attempt to review the strengths, weaknesses, achievements, and limitations of the HRI after its first five years. This attempt included a wider online Stakeholder Survey (DARA, 2012). Interestingly, almost 70% of the total survey respondents found the GHD principles very relevant to measure donor practices, and almost 100% found that independent external monitoring and evaluation of donor practices is very or completely important. Regarding the specific role of the HRI on assessing OECD/DAC donor governments, 2 out of 3 respondents found it "very important".

Since the inception of the HRI however, some donor governments had expressed concern over aspects of its methodology, and more particularly, they questioned the validity of the comparative ranking. DARA's 2012 comprehensive review comprised an independent consultation process on donor perspectives,[9] which concluded that "[t]he relationship between DARA and donor governments

[9] The consultation process was carried out between June and August 2012, and included interviews with 26 donor representatives, representing 18 of the 23 OECD-DAC donor government assessed by the HRI. The interviews were based on a survey designed to bring out opinions. The process was also complemented by interviews with 15 experienced humanitarians, and consultations with members of the HRI team.

regarding the HRI has been a stumbling block towards a more constructive engagement between the two sides, and an impediment towards potentially leveraging the extensive research into more practical guidance and changes in donor practices, limiting the utility of the initiative" (Kellet, 2012). At the same time, some individual staff of donor agencies highlighted that the HRI provided useful information for internal purposes, e.g. when negotiating internal priorities or aiming to ameliorate existing processes. This suggests that it can be compatible with donors' own efforts to measure and improve their performance. In this regard, it is noteworthy that the independent consultation concluded that most donors saw the HRI essentially as a tool for internal donor development, rather than external advocacy – contrary to the view of quite a few of the humanitarian agency representatives consulted (Kellet, 2012, p. 14). These findings correspond well to the views gathered through the interviews conducted for this feasibility study.

Main findings of the independent consultation process on donor perspectives on the HRI
(in Kellet, 2012)

- General acceptance of the HRI's overall aims, and the importance of independent review;
- Some use of the HRI in internal debates, but little direct impact on donor policy or practice reported by donors;
- Persistent questions on how to assess and measure good donor practice;
- General disapproval of the HRI's presentation of findings; and
- Problems around communication, engagement, and ownership.

To protect the independence and integrity of the research process, the HRI was funded exclusively from private sources.[10] At the time DARA suspended the publication of the HRI due to a lack of funding, wider discussions on its impact and achievements had been underway. The final edition of the HRI clarified that it "is critically important to consider the HRI's findings and analysis, not as absolute truths, but as evidence of trends in donors' practices that can help policy makers and their partners reflect on what is working well and what can be improved" (DARA, 2011, p. 12). Whether the HRI findings supported or contradicted other research, evaluations, personal experiences, or points of view, its aim was that of "a tool and an entry point to promote more discussion and debate about how donors can contribute positively to greater accountability and impact for people in situations of crisis" (DARA, 2011, p. 12).

Did the HRI fulfil its purpose?

For the feasibility study to be fully relevant, it is important to analyse the gap left by the discontinuation of the HRI, not only in terms of the idea behind it[11] but also in terms of what it achieved. As highlighted above and based on conversations with members of the DARA team who were responsible for overseeing its development, the HRI endeavoured to fulfil a double purpose. On the one hand, by benchmarking donors, it would help them understand the scope of their commitments and through peer pressure help them correct policy deficiencies; on the other hand, by increasing public accountability, it would help civil society at large increase pressure on individual donors. To understand whether the HRI fulfilled its purpose, it is important to review each of the two objectives separately.

On the first objective, it is important to note that the donor environment at the time of the first publication of the HRI was ready for reaping suggestions on how to best translate the GHD principles into practice. As mentioned above, the HRI development capitalised on the Tsunami evaluation and its attempt to operationalise the GHD principles. Nevertheless, despite the donors' initial readiness to

[10] In addition to one large philanthropic contribution, the HRI received contributions from the Avina Foundation and the Dutch Postcode Lottery. The research process and the dissemination of findings was also supported through services and logistics provided by many humanitarian agencies.
[11] This point will be analysed in fuller detail in section 4.

engage in continued dialogue, the review of donor perspectives eventually found that only one out of 18 donors suggested that the HRI had a substantial impact on the way they do business (Kellet, 2012, p. 5). Stakeholders rather familiar with the original HRI have indicated that despite the initial opportunity to use the HRI results as a platform for dialogue, donors became rather critical of it. Be it because of the ranking nature of the exercise, or due to a failure to invest adequate time and resources to engage consistently with donors, the HRI seemed to achieve very limited success in influencing donor policies through dialogue. The exceptions to this appear to have been represented by smaller donors who were eager to better understand their role as humanitarian donors and thus used the HRI findings as a learning opportunity rather than as a criticism. At the same time, as highlighted in the discussions held for this feasibility study, with the bigger donors together providing more than 90% of the total humanitarian funding, the fact of only having impact on smaller donors significantly impairs the overall result.

On the second objective, the HRI intended to capitalise on its potential role as a watchdog of donor performance. And indeed, the feedback received in the interviews for this study revealed that the idea of the HRI as a civil society effort was a very valuable one. The discussions, however, also highlighted some of its shortcomings. As an independent effort, solely heralded by DARA, the HRI publication did not manage to create a basis for a civil society coalition that could have pushed for more targeted changes. Media outreach seemed to be part of a broader recognised weakness of a limited investment on communication. While the HRI had the potential for being a valuable independent watchdog initiative, the lack of strategic partnerships and a focus on investing mostly in its technical development meant that it had finally had no real success in galvanising broader civil society actors to push for change in donor policies.

In conclusion, the review on whether the HRI achieved its purpose is somewhat mixed. The HRI did contribute in some cases to influence donor policies by evaluating their performance. This was especially in the case of smaller donors. It did not however leverage its findings towards a broader impact. What this may also seem to highlight is the fact that two objectives may have been competing at times.

4. Defining the 'donor accountability gap' in the current context

A significant part of this feasibility study has been a desk-based review of the current context, looking both at recent developments in the donor accountability environment, and already existing review mechanisms of humanitarian donors and actors' performance against their obligations and commitments. A comprehensive comparative overview of the findings from this review can be found in annex 4, with details on each initiative/mechanism. Recent developments are presented in Annex 5. In summary, it is clear that much has happened in the five years since the discontinuation of the HRI.

First, there have been a number of developments, ranging from changes in the humanitarian operational context to substantial policy adjustments. The gap between total humanitarian needs and available funding has continued to grow, attracting increased attention. The role of donor governments outside of the OECD/DAC has continued to increase substantially, and while still small, the increasing importance of private funding should not be underestimated. The Grand Bargain has placed itself next to the GHD as a point of reference agreed to by donor governments, but importantly, not all signatories to the GHD initiative have signed up to the Grand Bargain. And while all government donors that have signed up to the GB are also signatories of the GHD, the GB has also been signed by a number of

agencies/INGOs who have not committed to the GHD.[12] While many of these policy frameworks may overlap with regard to certain commitments, they are not identical.[13] It is still early to comment on the implementation of Grand Bargain commitments. It is worth noting, however, that commitments were made on a voluntary basis and among a sub-set of the broader humanitarian community.

Second, the 'donor accountability space' is more crowded today than at the time of the first publication of the HRI. Discussions on the options for a mechanism dedicated to the monitoring of the Grand Bargain commitments are ongoing, in parallel with monitoring initiatives and more or less *ad hoc* mechanisms that are meant to increase both the transparency and accountability of donor aid flows. What the review also points to is that individual humanitarian donor accountability currently focuses either on horizontal approaches, such as peer reviews and self-assessments, or on very specific elements of donor commitments, for example transparency. From a donor government's perspective, it can be argued that self-assessment, peer review, and, in particular, collective dialogue through the Good Humanitarian Donorship initiative, are sufficient accountability tools. In addition, while it may serve national interests more than global ones, donor governments may point out that ultimately their accountability is ensured through reporting to national parliaments. From a civil society perspective, a few initiatives have underscored the importance of independent monitoring of donor commitments. These have either started with a more general focus on official development assistance (ODA), including humanitarian aid or later expanding to include it, or have been looking at the effectiveness of humanitarian aid either from a donor or from a system-wide perspective. The review has shown that it is only the International Rescue Committee's Humanitarian Commitment Scorecard that takes an independent look at how well humanitarian donors live up to their commitments. It would equally appear, however, donor governments' performance in relation to the commitments they have signed up to is currently looked at in different ways in parallel and from different angles. This implies that identifying the 'accountability gap', requires careful analysis. In particular, it is helpful to consider the need for an additional review mechanism in the light of a few criteria: the 'why' or the objective; the 'what' or the scope; the 'how' or the approach.

Why (Objective)

The research undertaken for this feasibility study has indicated that while review mechanisms may share a common goal of achieving a better response for better humanitarian outcomes, their more specific objectives towards achieving this goal can differ. Put simply, they can be grouped under four main objectives. As noted above with regard to the HRI, some of the objectives mentioned below can in some cases overlap.

- **Public accountability**: in this case the review mechanism is intended simply as an opportunity to review donor performance against publicly-made commitments, both in the form of an independent, watchdog-like exercise and as a donor-led or endorsed initiative. More specifically, this objective can either focus on a 'naming-and-shaming' strategy, aiming to foster a 'race to the top' through ranking, or it can focus on rewarding good behaviour, for example by highlighting good performers. Overall, this objective can also have a general focus on transparency, something which connects it to the second type of main objective. Examples of such mechanisms are the Humanitarian Commitment Scorecard, and the Aid Transparency Index.

[12] See annex 2 for a picture of the varied signatories to these commitments.

[13] To this picture can be added the European Consensus on Humanitarian Aid, which was **s**igned in 2007 to improve the coherence, effectiveness, and quality of the EU's humanitarian response, through a series of commitments. The European Consensus only applies to the member states of the European Union, some of which have signed up to the GGD and/or the Grand Bargain, but not all. See Annexes 1 and 2.

- **Mapping the chain**: in this context, the assumption is mostly that transparent aid is better aid and it is important to track where aid is coming from and where it goes. Aid transparency helps government officials better allocate resources. It also supports civil society in holding governments accountable. In addition to assessing transparency, the main objective of mapping the chain can also simply be to highlight the extent to which donor governments take responsibility (something which makes a connection to the public accountability objective), or to identify if there are any gaps in regard to where aid is going. Examples of such mechanisms are the Global Humanitarian Assistance Report, and the Aid Transparency Index.

- **Platform for dialogue**: the information/data collected on donor performance is used in view of engaging different stakeholders, thereby maximising exchanges on existing challenges and good practices in fulfilling specific commitments. Examples of such mechanisms are the OECD/DAC Peer Reviews, and the Global Humanitarian Assistance Report or the GHD Initiative itself.

- **Identify systemic challenges to better aid**: similar to the preceding objective, the focus is here on engaging actors towards operationalising unclear commitments, identifying good practices, or assessing the degree to which commitments and standards do in fact allow for better aid, but it differs in that it looks at these issues from a more holistic point of view. Indeed, while this objective recognises that donors have substantial influence on how and where aid is allocated, it also considers the fact that the quality of such aid is also influenced by other parts of the humanitarian system. An example of such an endeavour is the State of the Humanitarian System Report.

What (Scope)

Depending on the objective, different initiatives/mechanisms can differ in scope, both with regard to the actors under review and the type of commitments considered.

The actors under review

- Key reform initiatives (ALNAP, Sphere, CHS…) focus mostly on operational organisations without looking at the unique role of donors within the system. The GHD reinforced the idea that donors have a role, which complements the other parts of the humanitarian system, and that they have a special responsibility to ensure that their policies and decisions help uphold and promote impartial, neutral, independent and effective humanitarian action.

- Except for reporting platforms, such as OCHA's FTS and IATI, which build their strength on including as many donors as possible, most of other existing initiatives/mechanisms look specifically at targeted sub-groups. Selection criteria for inclusion span from membership – e.g. OECD members or GHD signatories, to size – e.g. annual spend and/or significant role and influence. Very limited is the focus on non-traditional donors, mostly linked to the fact that it is more difficult to review their performance against their own commitments, as they have rarely signed up or been part of international initiatives.

The type of commitments considered

- Most current accountability frameworks focus on either financial probity or project level activities. As highlighted in a HERE Report "[t]he extensive accountability work on beneficiary feedback mechanisms, for example, does not address feedback to the political and systemic level. The need is to expand upon this base, to bridge the disconnection between the project and the broader humanitarian intervention, for instance, to identify gaps in aid that do not relate to the work of any single agency" (HERE, Humanitarian Priorities - Accountability meeting report, 2016, p. 4).

- 'Horizontal' accountability mechanisms – peer reviews and self-assessments – focus mostly on the GHD principles, in an attempt to analyse the quality of aid. Equally focused on the quality of aid is

the SOHS Report, which looks at the effectiveness of the system as a whole. The Grand Bargain commitments – one of the most important outcomes of the 2016 World Humanitarian Summit – are only currently being looked at briefly through the Humanitarian Commitment Scorecard, although discussions as to how to monitor their implementation are ongoing in numerous fora. Finally, especially for those indexes/mechanisms that find their source in the broader review of overseas development assistance (ODA), the commitments expressed in the Accra Agenda for Action (2008) and the Busan Partnership Agreement for Effective Development Cooperation (2011) inform the baseline for agency performance against the transparency of aid.

- Most initiatives/mechanisms focus on individual agency performance, be it of donors or implementing organisations. There are a series of collective indicators/peer review mechanisms (especially linked to GHD) but, as put in the HRI 2008: "[t]he major drawback of such an approach is that it does not provide the general public, humanitarian actors, or policy makers with easily accessible, transparent information about individual country performance. In fact, it may hide poor performers among the overall collective results – which is not conducive to making governments more transparent and accountable to their publics with regard to how humanitarian assistance is provided and how it can be improved…In addition, the internal focus of the collective processes could potentially isolate donors from wider debates about the quality and effectiveness of humanitarian assistance and its links to ongoing debates on development, security, and political concerns" (HRI 2008:9).

How (Approach)

The specific methodological approaches used by the different initiatives/mechanisms are dependent on both their objective and their scope. Nonetheless, a few common remarks can be made.

- Most existing reviews of donor performance are based on a quantitative analysis. The review of the quality of aid is thus relatively limited. The GHA report, for example, stops at the gap between needs and resources.[14] To review of the quality of aid is also, however, to look at how it is being used and given.

- There are two broad ways to collect data: relying on secondary sources and collating data already publicly available, or collecting primary data. The Humanitarian Commitment Scorecard is solely based on available quantitative data. The State of the Humanitarian System Report, on the other hand, relies heavily on primary data. In some cases, the approach can be built on a combination of both. In the case of the Aid Transparency Index, for example, the data used is that which is publicly available, but donors and agencies under review are also involved to provide additional information, for example where publicly available data is not up-to-standard.

- For those initiatives that are based on membership, reporting is either voluntary or compulsory. Where voluntary, the degree of acceptance naturally determines the quality and impact of the initiative/mechanism. For the success of outside initiatives, on the other hand, the level of engagement with those under review seems to be a contributing factor to the acceptance and credibility of the results put forward.

- The frequency of the publication also varies. In some cases, for example the Aid Transparency Index, it is almost a real-time exercise. In other cases, the nature of the exercise requires longer timelines, such as in the case of peer reviews. In the case of yearly findings, the relevance of the exercise is also dependent on the ability to identify trends and changes from year to year.

[14] It is noteworthy however that discussions held for this feasibility study highlighted that the GHA is increasingly including qualitative considerations.

The current context analysis has highlighted that there are several accountability initiatives in existence that need to be considered when deciding on whether there is a need for a revived HRI, and if so, what shape it would take. It is important also to note that any new initiative could take various shapes, which essentially depend on the initial objective of the exercise. The above analysis of the donor accountability gap has thus greatly informed the review of the feasibility of revamping the HRI in its original form. Section 5 will provide further details.

5. The feasibility of reviving the HRI

The main purpose of this feasibility study is to investigate the need for, and possibility to revive the HRI. This section explores this further from objective, technical, and operational angles, bearing in mind the findings from the above context analysis and grounding any considerations in the specificities of HERE.

Objective review

Reviews of the HRI and the analysis of its impact provide a good indication as to whether the original objective would still hold true today. The independent donor consultation discussed in section 2 concluded that the HRI did not "get to the heart of the matter" (Kellet, 2012, p. 15), and that there were three main interlinked issues that would need to be addressed to move forward, namely:

1. **The research and dissemination of the project**: the HRI's agenda, research process, and dissemination arguably undermined its goals;
2. **The HRI's objective, and position vis-à-vis donors**: it was unclear what the HRI was trying to be and what its relationship to the donors was, and by attempting to be both a learning partner to the donors and a hard-hitting external advocacy project the HRI lost its identity; and
3. **The nature of best practice**: it is unclear what is the right model for good humanitarian donorship, and whether the GHD are correct, comprehensive, and up to date.

As demonstrated by the example of Publish What You Fund, with their Aid Transparency Index, it is possible to successfully merge two distinct objectives, namely that of being a watchdog, and that of providing a platform for dialogue.[15] The experience of the HRI has shown however that it is important to be clear as to what the exercise is trying to achieve internally, and communicate that very clearly externally as well. Following the 2012 review process, and based on the belief that the HRI was still "a unique project in the humanitarian sector" (DARA, 2013), DARA did consider the publication of an 'HRI 2013', in line with the findings of the stakeholder survey, and the recommendations of the independent consultation. In view of achieving a high-quality product on a complex topic with limited resources, the strategy for revision highlighted that the HRI would need to find a balance between a broader and a deeper analysis. The HRI would need to be adapted to the context and capacities of DARA, but also to the demands of the humanitarian sector. Importantly, the issue of the 'two hats' of the HRI was also highlighted, and the argument made that the HRI would benefit from a clearer positioning between independent watchdog of donor performance, and technical assistance initiative to government agencies.

The original HRI had the potential of becoming a helpful platform for dialogue around the implementation of the GHD principles given the openness and interest of GHD donor members to understand how the principles could translate into practice, in a commonly accepted language. Donors needed someone who could help them interpret what they had signed up to. The idea of the platform for dialogue worked because donors had a need that could be filled by an independent entity that had

[15] Although most of the times, one of the two almost becomes a secondary/indirect objective.

already its own funding to start. The HRI had at the beginning the buy-in of at least some of the very same ones it was reviewing. In the current scenario, a shift has clearly happened. The GHD principles are now an established presence in horizontal accountability mechanisms either initiated by GHD members, or in which GHD members are actively participating, such as the GHD Initiative self-assessments and the OECD-DAC peer reviews. The need for an outside interpreter is no longer there. Instead, current discussions around the monitoring of the commitments made at the 2016 World Humanitarian Summit and/or through the Grand Bargain receive attention from donors, in a manner resembling the attention given to the GHD principles at the time of the launch of the HRI.

Conversely, for the new HRI to play the successful role of a donor performance watchdog with the ultimate goal of influencing donor behaviour, it is clear that a single-organisation enterprise has its limits. To effectively mobilise public opinion, a coalition of civil society organisations and media interest would be particularly helpful. Currently, most civil society focus appears to be on two major areas of the Grand Bargain. One is on aid transparency – which is highlighted also in the GHD principles and other donor commitments – and the other on the localisation of aid. The issue of aid transparency has mobilised civil society organisations across the development and humanitarian aid divide as it basically supports the idea of providing accurate quality information in a way that is helpful to inform decisions. The space appears as very well organised and benefits from the support of the very same ones who signed up to the commitment of increased transparency. The issue of localisation of aid is subject to more definitional confusions and has seen the development of a coalition of national/local NGOs[16] supported by those INGOs traditionally more closely working with them. The extent to which civil society can be mobilised towards a more general accountability exercise regarding the Grand Bargain commitments remains to be explored. It is worth noting, however, that the nature of the exercise in which INGOs are signing up to the same commitments as donors, in principle on an equal footing, may make it difficult to create that base for a naming and shaming exercise of donors. It may be difficult for civil society to act since they are themselves an inherent part of the exercise.

Ultimately, the success of an exercise according to either or both objectives will depend on the level of buy-in, either of those targeted by the review itself or by those who have a mandate or an interest in holding the signatories accountable.

Technical review

From the technical point of view of a possible revival of the HRI, it is noteworthy that the 2012 independent consultation identified a series of donor recommendations on how to improve the project. It was thought that the HRI could add direct value to good donorship if it investigated in detail the contextual barriers that prevent donors from achieving good donor practice, especially those that concern institutional issues rather than prioritisation (Kellet, 2012, p. 15). Moreover, the consultation highlighted that the HRI should play a part in helping donors decide what humanitarian good donorship *is* in the changing humanitarian landscape, better complement the DAC peer review, and consider going

Main recommendations by donors
(in Kellet, 2012)

- The methodology and presentation through ranking should be revisited;
- The ambition of the project should be re-examined;
- Trust should be built through direct and deeper engagement with donors;
- The focus on donor work should be more representative, by looking outside of GHD; and
- Focus should be on what is required, and capacity-building.

[16] An example is the birth of the NEAR Network.

beyond looking only at traditional donors (Kellet, 2012, p. 15).

In terms of **the relevance** of the HRI, DARA's 2013 strategy for revision pointed to its research focus, and its outputs. With regard to the research focus, it was argued, for example, that the OECD/DAC donors are not as relevant as before, and that the GHD initiative after 10 years shows signs of inertia, no longer playing a key role in the system. In terms of outputs, it was highlighted that the annual reports that compiled the results of a year-long work remained largely silent between annual presentations. This meant that while correct, the findings of the HRI reports were frequently not new, and the fragmented research process hindered the quality of the overall analysis. The strategy for revision also discussed **the credibility** of the HRI, pointing out that "in spite of repeated attempts to refine its methodology and improve the quality of the analysis, the HRI continues to be dismissed by the donor community" (DARA, 2013).

When looking more closely at the scope, the authors of the HRI itself admitted how "[s]ome of the challenges faced by the HRI are the same as those facing the humanitarian system and, as such, difficult to compensate for in the design" (DARA, 2009, p. 14). For example, DARA saw the GHD Principles as the closest attempt to reach a common, universally-accepted definition of good donor performance. At the same time, they also acknowledged that the very dynamic and evolving nature of the principles leave room for different interpretations, and there are likely to be other perspectives within the sector that are not captured by the GHD Principles (DARA, 2009, p. 14). As such, it is fair to say, like one of the interviewees for this study did, that to some extent the HRI methodology could only be as good as the GHD principles were. As highlighted in the 2011 HRI, "[a]nother disadvantage to the GHD is that the declaration itself is vague and contradictory in many places, leaving it open to interpretation by each donor. Additionally, reforms in the humanitarian sector, such as clusters and pooled funds, have made some of GHD declaration out-dated, and trends such as the emerging importance of new donors, both government and private, have supplanted many of the original GHD donors in terms of size and influence" (DARA, 2011, p. 3).

Towards the end of the HRI project, the research team had started looking into the idea of expanding the scope of the exercise to non-traditional donors and UN agencies. The HRI 2013 was conceived to prioritise the advocacy dimension, and to produce several inter-connected products: a number of crisis reports published in real time (Syria, Mali, Myanmar, South Sudan, Yemen), a ranking of all donors in relation to these crises, a think-piece on what DARA would consider to be good humanitarian donorship, and an assessment of UN-agencies as donors in relation to these crises (DARA, HRI 2013 Progress Note, 2013). The idea was to develop three different rankings – one for traditional government donors, one for non-traditional government donors, and one for pooled funds/UN agencies. Nevertheless, if the HRI exercise was intended as an evaluation of donor performance against signed commitments – the GHD Principles – such an approach may appear contradictory. While on the one hand it would have addressed the challenge of only looking at a sub-set of donors, on the other hand the exercise may have risked losing its entire meaning as non-traditional donors and UN agencies never formally signed up to the GHD Principles. There would need to be enough buy-in on a simplified definition of good humanitarian donorship that could be based on elements of customary law as gleaned from UN General Assembly Resolutions for the HRI to be worthwhile.

Methodologically, starting from available quantitative data, the HRI focused on collecting primary qualitative data. However, two major challenges became apparent. Firstly, the HRI research team had to solve the difficulty of how "to convert the GHD Principles into specific, measurable indicators based on reliable data sources" (DARA, 2009, p. 14). This was particularly difficult as the HRI relied on quantitative data from sources that had their own weaknesses and limitations. And while much work has been done to address these limitations, the quality and comparability of the data available still needs to be taken into account. Secondly, "[th]e use of a survey tool to generate qualitative data

presents its own set of difficulties, particularly around generating a representative sample and a sufficient response rate to ensure that survey results are valid and reliable" (DARA, 2009, p. 14). This meant that the HRI team had to ensure both a minimum number of responses from donors and equally invest substantial resources in field missions to capture a sufficient overview of context-based realities. Such an approach is a costly undertaking that needs sufficient resources both in terms of time and budgets.

Operational review

Beyond the technical feasibility, it is equally important to explore the elements that would allow the actual publication of the HRI. In particular, it is important to analyse the options available to access the information necessary for the analysis and the elements necessary to allow the HRI to be relevant, including those of a more political nature.

On the first point, a discussion on the options available to access information closely resembles the arguments presented above around the objectives of the exercise and its methodological challenges. The data collection can either be based on publicly available secondary data or primary data, or a combination of both. When looking at information to be obtained on/by donors, three points become apparent in the current context:

1. The IRC's Humanitarian Commitment Scorecard is already an attempt at providing a quantitative review of donor performance against a number of commitments based on publicly available data. It is unclear at present what form the scorecard may take but it takes relatively little resources to update it on a regular basis in its current form;

2. Considering existing horizontal accountability mechanisms already in place and the discussions around the implementation of the Grand Bargain, it is likely that donors will receive more requests to contribute information from different quarters. It will be important to consider potential survey fatigue among donors; and

3. Finally, the bigger the incentives, the greater the likelihood that donors themselves will be interested and willing to contribute primary data directly. Considering the point above about donor fatigue and the fact that each individual donor may also respond to different incentives, the legitimacy and credibility of an HRI-like exercise are of the utmost importance.

Equally, for the HRI to be and remain relevant it needs to invest in stakeholder engagement, as well as taking into account the systemic changes within the humanitarian landscape. In reality, both these points represent the biggest weaknesses highlighted in the review of the original HRI. The substantial investments made for the data collection were not accompanied by similar investments in consistent communication and engagement with the donors reviewed by the HRI. As a way of comparison, the Aid Transparency Index counts on both part-time and full-time staff located in some of the most strategic donor capitals, such as Brussels and Washington, D.C., beyond the research team dedicated to producing the data for the Index. Similarly, the HRI research team tried to adapt the methodology to account for the criticisms and integrate some of the new realities the index was being confronted to. The whole idea of systemic changes, however, was not integrated into the HRI development process but it was rather an externality that the HRI needed to manage somehow.

A revised HRI?

In light of the arguments highlighted in the review above, it is clear that revamping the HRI in its original form is not feasible. The conclusion of this review is in line with the outcome of the discussions the HRI team had between 2011 and 2013. Moreover, simply revamping the HRI in its original form would mean disregarding some substantial developments that have taken place in the past few years, namely an

interest in looking at the wider performance of the different pieces of the humanitarian community, and the further commitments a number of donors have signed up to through the Grand Bargain.

For the purpose of the feasibility study, the review has also explored what type of adjustments the HRI may need to undergo to address some of the weaknesses highlighted above, while still retaining its original purpose and largely overall approach. For the HRI to be fully relevant in the current environment, it would need to undergo a number of changes, including:

- The scope would need to be adapted to take into account not only the GHD principles but also the commitments as included under the Grand Bargain, mostly as the latter provide additional details to the formulation adopted under the GHD;

- The exercise would need to have a clear focus with a very clear objective both internally and externally: e.g. evaluation of donor performance, based on the top 10 donors that have signed up to both the GHD principles and the Grand Bargain. While it is indeed clear that donors are only a part of the humanitarian system, the assumption would be that they still retain a substantial influence over the outcomes of humanitarian action, and even more so in the case of the 10 bigger ones. The exercise could also narrow down the focus on the number and type of commitments: cash transfers and aid transparency, for example, are already well looked at. The focus could instead be on either taking cash transfers or transparency the extra mile, and look at the "why" things look the way they do – e.g. what's impacting positively or negatively the performance of the Grand Bargain signatories - or by focusing on the issue that no one is looking at (e.g. development/humanitarian divide, which will need to be operationalised);

- Align with existing initiatives/mechanisms that have already developed commonly-accepted indicators for performance against commitments or are in the process of developing them (e.g. OECD) or align enough buy-in for an independent definition of good donorship;

- Develop partnerships with other agencies/independent actors working on monitoring the Grand Bargain commitments to better identify complementarities and the exact nature of the niche for the revised HRI;

- Review the indicators and the methodological approach to better rely on publicly available data to be complemented by individual follow ups with donors under review;

- In terms of process, recognising that every system evolves naturally, the HRI will have to integrate different approaches. For it to fulfil its purpose, and still retain comparability, the HRI will need to be reviewed on a consistent basis (e.g. the model of a two-year cycle used by the Access to Medicines Index can be an example).

While these changes would likely strengthen the relevance of an HRI-like exercise, it is also clear that a number of preconditions need to be in place for it to be worthwhile. First and foremost, enough buy-in would need to be built around both the usefulness of the exercise and its legitimacy. Considering the number of actors that are working on operationalising the Grand Bargain commitments in view of its monitoring, it will be then important to have an equal seat at the table to ensure that the revised HRI is a meaningful exercise that builds and complements other existing or future initiatives. Duplicating something for which other stakeholders have already invested resources or received a 'mandate' or developing something that is deemed unhelpful because not in line with many of the current discussions would be counterproductive. Lastly, for the exercise to be operationally sustainable in the longer-term, unless the exercise is based solely on publicly available information, enough 'access' to the donors under review will need to be established. It appears unlikely that some of the bigger donors, who were most critical about the HRI approach towards the end, would endorse a revised HRI. Such an endorsement would be instrumental in garnering traction among the broader donor community and address the issue

of 'access'. Considering the risks of 'survey fatigue' which are likely to emerge out of the many requests donors are already subject to and will likely be for the implementation of the Grand Bargain and the different types of incentives donors are likely to respond to, this does not appear as a simple and realistic task in the short term.

6. Recommended way forward

Following on the conclusion that reviving the HRI is in its original form is not a viable option, the preceding section has shown that the revamping of the HRI in any form similar to that of its pre-existing version would require the fulfilment of a series of pre-conditions, and even then, the rationale for it is not obvious in current conditions. While the idea behind the HRI largely holds its current validity – i.e. the lack of independent mechanisms geared towards humanitarian donor accountability, the review has identified a number of challenges in the operationalisation of that idea, that make it not viable currently for HERE. However, the mapping exercise of the current accountability environment also highlights a few possible options that could be explored as alternatives to a revision of the HRI with the same goal of influencing the humanitarian system's performance.[17]

In particular, in light of HERE's own mission and comparative strengths, coupled with an analysis of the current humanitarian environment, it is suggested to evaluate donor performance from an alternative angle, one that would also take into account broader systemic challenges to good humanitarian donorship.

Measuring the impact of commitments

What the contextual review has hinted at is, among other findings, that there is no lack of commitments. It also appears that the positive relationship between the fulfilment of donor commitments and the effectiveness of humanitarian response is well established. What is seen as under discussion is the degree to which donors – and other stakeholders in the case of the Grand Bargain – fulfil such commitments. There is no lack of interest in policy-oriented stakeholders wanting to monitor the GB commitments. The link between normative frameworks and operational outcomes has however not been clearly established. There is a real lack of understanding among operational staff, and generally among those charged with implementing policies at the country level, of what all these policy commitments mean in practice.[18] And, conversely, there may be a need to consistently contextualise all the different commitments, if not only to better understand what they ultimately achieve. The quality of these commitments in the first place is not questioned. Indeed, the consultations held for the purposes of this feasibility study have highlighted that while numerous agencies and organisations are attempting to frame their own measurements of the Grand Bargain commitments, no one is really looking at the degree to which the various donor commitments do in fact fulfil a practical purpose.

This has been an issue for many years and it still is. Some of HERE's own conclusions in the Accountability Report for the Humanitarian Priorities Project highlighted how "[w]hile welcoming the Grand Bargain, the humanitarian community should not predicate progress on accountability upon donor reform without a better appreciation of why previous comparable attempts fell far short of their promise (i.e.,

[17] These are summarised in the flowchart in Annex 6, which identifies different avenues for action by looking in turn at the four objectives formulated in the 'why' section, i.e. 'Public accountability'; 'Mapping the chain'; 'Platform for dialogue'; and 'Identify systemic challenges to better aid'.

[18] For example, see the European Commission Staff Working Document on Gender in Humanitarian Aid (European Commission, 2013), the WFP conference report on Humanitarian assistance in conflict and complex emergencies (David Keen, James Darcy, Guillaume Foliot, & Thomas Gurtner, 2009) and the 2014 Humanitarian Futures Programme research paper for the European Interagency Security Forum (European Interagency Security Forum, 2014).

the Good Humanitarian Donorship Agreement)" (HERE, Humanitarian Priorities - Accountability meeting report, 2016, pp. 4-5).

An alternative to a revised HRI could be conceived as a more substantial endeavour to measure the impact of commitments, i.e. aiming to qualitatively assess whether donor commitments do in fact link to better aid, and if so, how. Not only would engaging in an effort to assess the links between commitments and results on the ground fit perfectly within HERE's mission of bridging policy and practice, but it would also be of direct relevance in terms of ensuring that the donors do not simply sign and live up to commitments for the sake of doing so, but that it actually has an impact when it comes to providing for a better humanitarian response. This option could practically translate into an impact assessment, which will require careful attention to develop the appropriate methodology and identify the baseline for all subsequent evaluations through a series of expert and stakeholder consultations. The approach could entail regular, real-time punctual situation analyses which communicate specifically on links between commitments – of both donors and agencies – and results on the ground. Building on one element of the original HRI approach, perception studies appear particularly interesting, since they could possibly garner recipient perspectives. Interestingly, in an ODI background note from 2012, Geddes focuses on 'impact' as a "the best measure of aid quality" (Geddes, 2012, p. 3), highlighting that a donor index needs to include recipient perspectives to ensure a direct measure of impact. On this point, he mentions the Humanitarian Response Index as a "successful example",[19] indicating that inspiration could be drawn from the methodology behind the HRI crises reports. Another idea would be to explore possibilities for working together with the Senior Transformative Agenda Implementation Team (STAIT), to draw from and complement their sharing of learning and good practice.

In order to maximise the reach of such an exercise and minimise the investments required, two intermediate steps are suggested, building either on projects already undertaken by HERE or on external initiatives.

Intermediate step 1

In order to better inform the scope of an impact assessment as suggested above and to construct its baseline, it will be important to build an overview of the gaps left by humanitarian responses based on mostly already existing available data. Such a mapping would help then establish a framework for exploring how well are commitments helping address such gaps. The context analysis has shown that one issue that currently lacks in review is a consolidated overview in regard to where aid is going. Measures of aid transparency, in fact, are already highly covered through the ATI, and through plans to improve reporting mechanisms like the FTS and IATI. The GHA also makes a significant contribution in highlighting where aid goes. Some efforts have been launched to analyse the difference between the desired and the actual response, but there is a lack of a comprehensive picture of the gaps at the global level. The largest gaps seem to be in 'hard-to-reach' or insecure areas where the needs are supposedly the greatest and few humanitarian actors have a (permanent) presence. According to the principle of impartiality, responses need to be carried out in a non-discriminatory way, but aid also has to be delivered first where it is needed most.

A tool that will help **map gaps** in the funding chain could be developed, for example by contrasting publicly available needs assessments with existing data on where aid is going. This would largely rely on publicly available data. At the same time, however, it is important to note that any effort that attempts to 'map the gaps' in the humanitarian response requires careful definition of the gaps in question, and while they may very well be essentially of a financial nature, they could also be operational, political, or linked to a lack of capacity. Starting from an overall review of existing country and global efforts or

[19] Other good examples forwarded by Geddes are the "Voices of the Poor" survey (World Bank, 1999), the "Listening Project" (CDA, 2011) and (Wathne, Burall, & Hedger).

initiatives to collect and analyse data about needs (e.g. ACAPS), operational responses, and the gaps in the responses, HERE can determine the exact scope and nature of the gaps focusing particularly on armed conflict settings, to build a baseline.

Intermediate step 2

Similarly, especially when looking at broadly framed commitments, **operationalising unclear donor commitments** would set the basis for the analytical framework for any impact assessment. Such an operationalisation will be necessary to ensure that all necessary parameters are in place to study the impact of commitments. The exercise would simply require developing commonly-agreed indicators and benchmarks for performance. Indeed, while some existing commitments are rather straight-forward in that they stipulate quantifiable targets, others are more nebulous. The Grand Bargain is a very good example of this, mixing more tangible commitments – like following the IATI standard to enhance transparency, increasing cash-based assistance and supporting a specific number of multi-year collaborative planning – with more vaguely worded pledges, such as 'harmonise' partnership agreements, 'strengthen local dialogue', and 'use resources better to shrink humanitarian needs over the long term'. This exercise would focus on a sub-set of commitments, i.e. those which purport to enhance engagement between humanitarian and development actors. These commitments are particularly interesting in that they can all be found to some degree in the Grand Bargain and the GHD, as well as in the European Consensus on Humanitarian Aid (see Annex 1). They all, however, are still lacking a detailed guidance on the way they can be implemented so to contribute to a better humanitarian response. HERE's ongoing Mandates Study would bring an interesting perspective and needed findings to proceed with such an attempt.[20]

7. Conclusion

The feasibility review of reviving the Humanitarian Response Index was carried out from the assumption that its suspension left an unequivocal gap in donor accountability. In line with the original idea, while recognizing that there are many parts of the humanitarian jigsaw that eventually influence the effectiveness of humanitarian action, the understanding was that institutional donors still hold considerable power to influence the performance of the rest of the chain. And still, institutional donors largely remain unaccountable. Without necessarily challenging the appropriateness of such assumption, the study looked particularly at two aspects when considering the idea of revamping the HRI: *should* it be done (objective review) and *can* it be done (technical and operational review).

While the original idea behind the HRI still holds valid as there are close to none independent bodies holding humanitarian donors accountable on their performance against agreed commitments, the review has shown that reviving the HRI will not necessarily help achieve the ultimate goal of more effective humanitarian action. This is because of both technical and operational (including political) considerations. There is no lack of commitments. And most stakeholders are focused on monitoring how well signatories are holding true to their promises. Yet, the quality of those commitments remains to be tested. HERE is better positioned, because of its mission and ongoing work, to deconstruct those very same commitments, to establish the link between donor performance and effective humanitarian action.

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[20] This study, entitled 'The role of mandates in humanitarian priority setting for international non-governmental organisations in situations of armed conflict' aims to clarify what differences there are between organisations in terms of how they set priorities and come to strategic choices, and what the advantages and disadvantages of different 'mandates' are. For more information on this, see http://here-geneva.org/what-we-do-2/our-projects/.

A brief analysis of the donor accountability gap has further highlighted a very limited focus on non-traditional donors, including non-state or private donors. Ahead of the World Humanitarian Summit, more research has been done to quantify the share of private funding, a composite of private individuals, trusts and foundations and companies and corporations. While it remains true that traditional donors are still providing the lion's share of all humanitarian funds, and that any scrutiny of non-traditional donors would thus only have a minimal impact, it should not be neglected that while they are still small, they are providing an increasing amount of funding, largely without any public scrutiny. In the case of private donors, their role vis-à-vis the international humanitarian community has also been evolving over the years allowing them to be increasingly seen as potential funders and partners. Yet, here again, the quality of their funding has not been explored. It will be for HERE to assess to what extent such an investigation could be included in its own outreach towards foundations.

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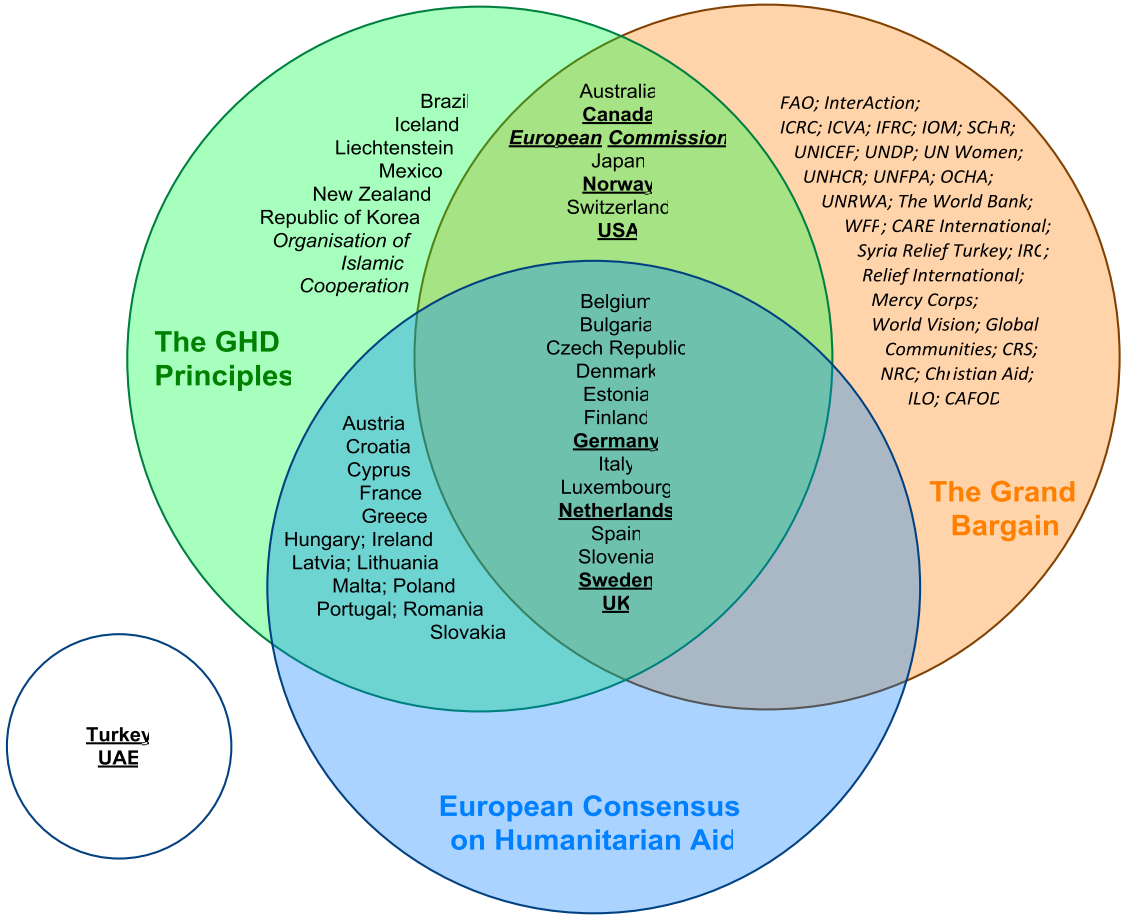
Annex 1: Comparative overview of regulatory frameworks for humanitarian donorship

	Grand Bargain	GHD Principles	European Consensus on Aid
Signatories	**21 donor governments**: Australia; Belgium; Bulgaria; Canada; Czech Republic; Denmark; European Commission; Estonia; Finland; Germany; Italy; Japan; Luxembourg; Netherlands; Norway; Spain; Slovenia; Sweden; Switzerland; United Kingdom; United States of America *(and FAO; InterAction; ICRC; ICVA; IFRC; IOM; SCHR; UNICEF; UNDP; UN Women; UNHCR; UNFPA; OCHA; UNRWA; The World Bank; WFP; CARE International; Syria Relief Turkey; IRC; Relief International; Mercy Corps; World Vision; Global Communities; CRS; NRC; Christian Aid; ILO; CAFOD)*	**17 initially, now 42 members**: Australia; Austria; Belgium; Bulgaria; Brazil; Canada; Croatia; Czech Republic; Cyprus; Denmark; Estonia; European Commission; Finland; France; Germany; Greece; Hungary; Iceland; Ireland; Italy; Japan; Latvia; Liechtenstein; Lithuania; Luxembourg; Malta; Mexico; Netherlands; New Zealand; Norway; Poland; Portugal; Republic of Korea; Romania; Slovakia; Slovenia; Spain; Sweden; Switzerland; United Kingdom; United States of America *(and Organisation of Islamic Cooperation)*	**28 EU Member States**: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom
Objectives and Definition of Humanitarian Action		1, 2, 4: the objectives of humanitarian action 3: the humanitarian principles.	1-3: the meaning of humanitarian aid 4-5: the role of the EU in humanitarian aid. 10-14, 93: the humanitarian principles 8: the objective of EU humanitarian aid.
Greater Transparency	1: timely, transparent, harmonised and open high-quality data (possibly using IATI).	23: high degree of accuracy, timeliness, and transparency in donor reporting.	31, 46, 72: transparent allocation and accountability.
More support and funding tools for local and national responders	2: a global aggregated target of at least 25% to local/national responders, by 2020.	6: strengthened capacity of affected countries and local communities.	9, 48, 53, 74: capacity building activities, and support to local disaster response.
Increase the use and coordination of cash-based programming	3: investment in new delivery models & standards and guidelines for cash-based programming.		35: innovative modalities for aid delivery, including non-commodity based approaches (such as cash and vouchers).
Reduce duplication and management costs	4: reduce duplication/costs, harmonise donor assessments.		47, 54-56: efforts within EU to avoid duplication 66: EU commitment to not duplicate international mechanisms.
Improve joint and impartial needs assessments	5: e.g. streamlining data collection, sharing data, and commissioning independent reviews and analysis	6: allocation on the basis of needs assessments. 22: regular evaluations, incl. assessments of donor performance.	8: needs-based emergency response 32, 33, 34, 37, 69,: needs assessments, and to identify 'forgotten crises'.EU understanding of needs assessments 88: the Global Needs Assessment.

	Grand Bargain	GHD Principles	European Consensus on Aid
A participation revolution: include people receiving aid in making the decisions which affect their lives	6: engagement with and accountability to affected populations.	7: adequate involvement of beneficiaries 21: learning and accountability initiatives.	43-45: accountability and call for a participatory approach with local populations.
Increase collaborative humanitarian multi-year planning and funding	7: Support in at least five countries by the end of 2017 multi-year collaborative planning and response plans.	5, 12: flexible, timely, and predictable funding.	36: timely, adjusted aid 68: predictability and flexibility 27, 28, 30, 71, 97: collaborative efforts of the EU.
Reduce the earmarking of donor contributions	8: global target of 30% of humanitarian contributions that is softly/non-earmarked by 2020.	13: flexible earmarking, longer-term funding arrangements.	
Harmonise and simplify reporting requirements	9: simplification and harmonisation of reporting requirements by the end of 2018.		52, 94-96: streamlining of procedures.
Enhance engagement between humanitarian and development actors	10: using existing resources to shrink humanitarian needs over the long term with the view of contributing to the outcomes of the SDGs/durable solutions for refugees, IDPs, and migrants/resilience.	9: support recovery and long-term development.	42, 77, 78: ensure that humanitarian, development and other relevant aid instruments work together. 75-76, 90: disaster-preparedness.
Promoting standards and enhancing implementation		15-20: promote guidelines, principles, standards.	40-41, 57-65: internationally recognised standards and principles.
Special needs			23-24, 39: take particular vulnerabilities into account.
Selection of implementing partners			51: EU criteria for selecting implementing partners.
Reference to other commitments/organisations		10: UN, ICRC, the International Red Cross and Red Crescent Movement, and NGOs. 14: burden-sharing.	49: UN, ICRC, the Red Cross and Red Crescent National Societies supported by IFRC, and NGOs. 18-22, 73: GHD, partnerships, intl approach. 25-26, 29, 50, 70, 91, 92, 98: Co-ordination within and outside EU.
General		11: funding of humanitarian action in new crises shall not adversely affect the meeting of needs in ongoing crises.	81-87: comparative advantage of the Community. 79, 80. 99, 100, 101: specific EU procedures.

Annex 2: Signatories to the Grand Bargain, the GHD principles, and the European Consensus

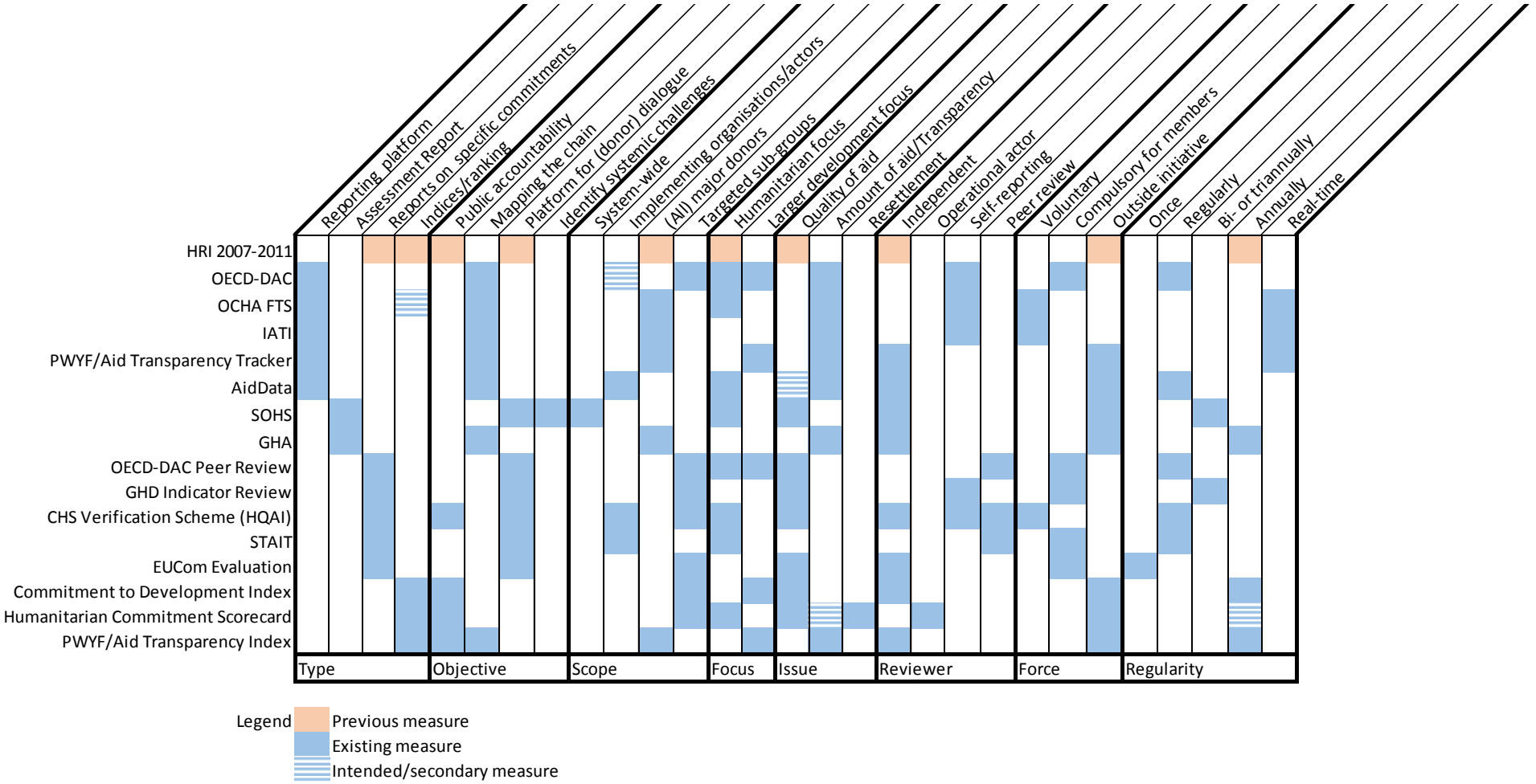


Bold/Underlined = Top ten donor according to GHA 2016

Annex 3: Evolution of the HRI 2007-2011

	HRI 2007	HRI 2008	HRI 2009	HRI 2010	HRI 2011
Main change		No of contexts increased; revised survey design; streamlining of quantitative indicators data, consolidation or addition of variables; better distribution/naming of indicators across pillars; presentation of index scores, with 10 point scale instead of 7 point scale.	No of crises increased; higher no of survey responses for GHD donors; expansion of statistical analysis to increase survey reliability and validity; expansion of survey to assess non-GHD 'donors' (500 responses for initial analysis).	No of crises increased; revised survey design; no of indicators reduced; comprehensive statistical analysis of responses to adjust for social or cultural factors; new quantitative indicator on climate-related vulnerability; analysis expanded through multi-dimensional analysis grouping donors.	Reduction of contexts down to nine only; same no of indicators as 2010 (though slightly different ones); grouping of donors allowed more space in document.
Conceptual framework	23 OECD-DAC donors ranked individually.	23 OECD-DAC donors ranked individually	23 OECD-DAC donors ranked individually; some survey responses from INGOs, UN, pooled funds…	23 OECD-DAC donors ranked individually and by group; some survey responses from INGOs, UN, pooled funds…	23 OECD-DAC donors ranked individually and by group; some survey responses from INGOs, UN, pooled funds…
Field case studies	8 contexts	11 contexts	13 contexts	14 contexts	9 contexts
Indicators	57 (25 quant., 32 qual.)	58 (20 quant., 38 qual.)	60 (20 quant., 40 qual.)	35 (15 quant., 20 qual.)	35 (15 quant., 20 qual.)
Pillars	1) Responding to humanitarian needs; 2) Integrating relief and development; 3) Working with humanitarian principles; 4) Implementing intl guiding principles; 5) Promoting learning and accountability.	1) Responding to humanitarian needs 2) Supporting local capacity and recovery 3) Working with humanitarian partners 4) Promoting standards and enhancing implementation 5) Promoting learning and accountability	1) Responding to needs 2) Prevention, risk reduction and recovery 3) Working with humanitarian partners 4) Protection and international law 5) Learning and accountability	*Idem*.	*Idem*.

Annex 4: Comparative mapping of existing monitoring mechanisms



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Annex 5: Current context review

Secondary data for this Feasibility Study was gathered through a systematic desk-based review of the current context. This annex summarises some of the findings of this review, looking first at recent developments in the donor accountability environment, and then at existing monitoring mechanisms.

Recent developments in the donor accountability environment

The five years since the discontinuation of the HRI have borne witness to a number of developments, ranging from changes in the humanitarian operational context to substantial policy adjustments.

The gap between total humanitarian needs and available funding[1]

The types and contexts in which the most pressing humanitarian needs are found have changed in the past decade and increasingly so in the past five years. Protracted and recurring crises have now become the norm. Displacement has continued to rise reaching an all-time high of 59.5 million of people forcibly displaced at the end of 2014 (UNHCR, 2015), more than a 28% increase from 2011. Whereas until 2012, displaced populations were largely within sub-Saharan Africa, in mid-2014, 95% of those displaced were in Low and Middle-Income Countries. Since early 2011, the war in Syria has been the "single largest driver of displacement" (UNHCR, 2015), impacting neighbouring Middle Eastern countries and beyond. At the same time, after a relative decrease of people affected by natural hazards in 2010 and 2011, numbers have since been rising. Far East Asia has been the most affected with flooding, drought and storms in China and the Philippines.

Given these trends, the overall number of people targeted by international assistance has almost doubled in the last decade, leading to a 430% increase in total global funding requirements between 2004 and 2013 (UN OCHA, 2014, p. 11). While international humanitarian assistance consistently increased from 2013 to a record US$ 28 billion in 2015 (Development Initiatives, 2016, p. 36), such amounts were neither enough nor equally allocated. The funding gap for humanitarian action was estimated at US$ 15 billion as of the end of 2015 (High-Level Panel on Humanitarian Financing, 2015, p. 2). Similarly, both geographical and sector-based discrepancies in funding allocations have been noted. On the one hand, in fact, crises such as the ones in the Central African Republic, Burundi and South Sudan were severely under-funded as opposed to those in Iraq, Syria and Afghanistan. On the other hand, sectors such as emergency agriculture, protection, and safety and security of humanitarian staff and operations continued to receive consistently less funding than the others (High-Level Panel on Humanitarian Financing, 2015, p. 39).

The number and type of donors[2]

The increase in the overall humanitarian funding envelope is also the reflection, among others, of the broadening of the group of government donors that provide funding to humanitarian responses. In the past five years, the role of governments outside of the OECD/DAC has continued to increase substantially, with their share more than doubling between 2011 and 2013 – from 6% to 14% (Development Initiatives, 2014, p. 25). This group is quite diverse comprising countries who were

[1] Most of the information presented in this section refers largely to UN-coordinated funding appeals. While these do not represent by far the entirety of the humanitarian system, they represent the current main collective measure of humanitarian needs and estimated response costs.

[2] While the focus in this section is on donor governments, the increasing importance of private funding in the last few years is not to be underestimated.

previously or are currently aid recipients (as in the case of Nigeria); countries that respond to disasters domestically, such as India and Turkey, and those who have been long-time donors (as in the case of UAE). Especially in response to the crisis in Syria, Gulf countries have raised their level of financial contributions to humanitarian responses. Contributions from the Gulf states have historically accounted for a significant proportion of all humanitarian assistance from non-DAC donors. Contributions from Kuwait, Qatar, Saudi Arabia and the UAE accounted for 35% of the total contributions from non-DAC donors for the period 2009 and 2013 (Development Initiatives, 2014, p. 35). While non-DAC donors' aid has become increasingly visible with many donor countries reporting their aid to the OECD DAC and OCHA's FTS, only a few have moved towards a more multilateral approach. In 2010, for example, Brazil became the thirty-sixth member of the GHD group, committing to the '23 Principles and Good Practice'.[3] As of mid-2016, 13 non-OECD/DAC member states[4] had joined in total.

The Grand Bargain

Faced with increasing resource constraints and a widening gap between needs assessed and resources available, the humanitarian community has sought to identify new ways of working in the past five years. Hailed as one of the main achievements of the World Humanitarian Summit held in May 2016 in Istanbul, a new 'Grand Bargain' was brokered as an agreement between some 15 major donor governments and most of the world's largest international humanitarian agencies and networks. The agreement is meant to take forward the recommendations from the UN Secretary-General's High Level Panel on Humanitarian Financing, which includes for donors to give more and better funding against new approaches to aid delivery, through greater transparency in the use of funds, more cash-based support, more impartial and independent assessments of needs, more resources and decision-making by national and local organisations, concrete progress in putting people affected by crisis at the centre of the response, and better linking up humanitarian and development efforts.

Accountability policies

Since the suspension of the HRI, the issue of accountability within the humanitarian sector has continued to bear witness to significant calls for reform. While efforts such as the Humanitarian Accountability Project (HAP) had allowed for the establishment of programme quality standards across specific humanitarian activities, it was increasingly recognised that they did not adequately address essential issues, such as accountability to aid recipients and humanitarian leadership. As recent efforts to remedy this, the UN-led Transformative Agenda and the NGO-led Core Humanitarian Standard on Quality and Accountability (CHS),[5] deserve particular mention.

The Inter-Agency Standing Committee (IASC) decided in 2011 to give new momentum to the 2005 Humanitarian Reform by adopting the so-called Transformative Agenda. With the ultimate objective of enhancing accountability to affected populations,[6] the Transformative Agenda recognised that "we need to focus not on the process of implementing change, but on the impact of change".[7] Concrete priority actions included an enhanced accountability for the achievement of collective results, based on an agreed performance and monitoring framework, and a strengthened accountability to affected communities, to be implemented at field level through a defined inter-agency operational framework.[8] Upon recent review, the Transformative Agenda has been found to have had some "positive effects"—for example in tightening accountability between lead-actors in humanitarian response—but to have

[3] The purpose of the GHD is to improve the coherence and effectiveness of humanitarian aid implementation.
[4] Out of these 13, 9 are EU member states.
[5] See https://www.corehumanitarianstandard.org/.
[6] See IASC Transformative Agenda, Chapeau and Compendium of Actions.
[7] Key Messages: the IASC Transformative Agenda, § 5.
[8] Key Messages: the IASC Transformative Agenda, § 6.

"led to little or no change in areas such as the humanitarian country team's collective leadership, accountability to affected populations, security and protection." (Krueger, Derzsi-Horvath, & Steets, 2016, p. 8). A lack of representation of non-traditional relief agencies, emerging donors, and national and local actors arguably meant that "[w]hile mutual formal accountability for UN agencies increased […] similar changes were not introduced for donors or NGOs and there was no systematic progress in the inter-agency monitoring of results in the field, despite evolving guidance" (Krueger, Derzsi-Horvath, & Steets, 2016, p. 27). Progress was found lacking particularly in the area of accountability to affected populations, largely caused by "unchanged donor practices" (IASC EDG, 2015).

The NGO-led CHS was launched in December 2014. In view of harmonisation, it built linkages between the 2010 HAP Standard,[9] People In Aid's Code of Good Practice,[10] and the Sphere Project's Core Standards.[11] Groupe URD also became a partner in the development process, committing to integrate the CHS criteria in its Quality COMPAS.[12] The CHS puts forward nine commitments that organisations and individuals involved in humanitarian response can refer to in order to improve the quality and effectiveness of their work. The premise behind the standard is that by knowing what humanitarian organisations have committed to, communities and affected populations will be better able to hold those organisations to account. The standards are also seen to by definition result in more targeted, timely, and needs-based responses.[13] As a voluntary initiative, organisations can choose to align their own internal procedures with the CHS, or it can be used as a basis for the verification of performance. While the push for the CHS has come from NGOs, several governments and donor agencies have expressed their support for it, for example Danida, Irish Aid, the Swiss Agency for Development and Cooperation, the German Federal Foreign Office, and the UK government.[14]

Detailed overview of existing monitoring mechanisms

Existing mechanisms for the review of humanitarian action can be considered in terms of four different types: data reporting platforms, general assessment reports, assessment reports on specific commitments, and existing indices.

Reporting platforms

- **OECD/DAC**: the 29 members[15] are obliged to report their humanitarian assistance to the DAC systems, as part of their official development assistance. Some other governments, and many bigger multilateral organisations also report to the DAC, but on a voluntary basis.
- **UN OCHA's Financial Tracking Service (FTS)[16]**: open to all humanitarian donors and implementing agencies, and concerns humanitarian assistance specifically. The FTS records voluntarily reported international humanitarian aid contributions, with a specific focus on humanitarian response plans and appeals. The FTS is particularly noteworthy in that it is a universal, real-time data-base, and it

[9] The 2010 HAP Standard in Accountability and Quality Management, http://www.alnap.org/resource/8125. HAP adopted the CHS in its Strategic Plan for 2014-2016, and did not actively promote its standards as of January 2015.
[10] The 2003 People In Aid Code of Good Practice, https://drc.ngo/media/2113064/people_in_aid_code_of_good_practice.pdf. People In Aid had no active promotion of its Code after January 2015.
[11] The Sphere Project Core Standards, http://www.spherehandbook.org/en/. The CHS will replace the Core Standards of the Sphere Handbook when Guidance Notes and Indicators are finalised.
[12] The Quality COMPAS, http://www.compasqualite.org/en/index/index.php.
[13] See https://corehumanitarianstandard.org/the-standard.
[14] See https://corehumanitarianstandard.org/the-standard/statements-of-support.
[15] http://www.oecd.org/dac/. DAC members are: Australia, Austria, Belgium, Canada, Czech Republic, Denmark, European Union, Finland, France, Germany, Greece, Iceland, Ireland, Italy, Japan, Korea, Luxemburg, The Netherlands, New Zealand, Poland, Portugal, Slovak Republic, Slovenia, Spain, Sweden, Switzerland, United Kingdom, United States.
[16] See www.fts.unocha.org.

offers a series of standard tables that show humanitarian aid flows in various formats, and also allows users to produce custom financial tables on demand. It is not a review mechanism *per se,* but can arguably serve "to analyse aid and monitor accountability among humanitarian actors".[17] Significantly, the OCHA FTS also publishes on its website a ranking of the top donors to existing response plans. It is noteworthy however that any reporting to the FTS remains voluntary, and all donors do not consistently report their contributions to the FTS.

- **International Aid Transparency Initiative (IATI)**: a voluntary, multi-stakeholder initiative, centred around the IATI Standard, a format and framework for publishing data on development cooperation activities. The idea is that all organisations in development—including government donors, private sectors organisations, and national and international NGOs—implement IATI by publishing their aid information on IATI's agreed electronic format. The information is then linked to the IATI Registry, which acts as an online catalogue and index to the raw data. Since 2011, over 450 organisations have published data on the IATI Standard. Many donor countries also publish data using the IATI Standard, though not all.[18] Again, IATI is not a humanitarian donor review mechanism in itself, but by making information about aid spending easier to access, use, and understand, it aims to allow citizens in both donor and recipient countries to better hold their governments accountable.[19]

- **Publish What You Fund**[20]: a global campaign for aid transparency that was launched in 2008. Among the initiatives undertaken by Publish What You Fund is an online platform, the **Aid Transparency Tracker**, which collects data from a survey, a review of donors' implementation schedules, and an automated assessment of data published to the IATI Registry.[21] The Tracker highlights what information donor organisations have committed to publish in their implementation schedules, as well as what they are currently publishing.

- **AidData**: works to "help international development organizations to more effectively track, target, coordinate, and evaluate their investments".[22] AidData was formed in 2009 as a partnership between three institutions – the College of William & Mary, Development Gateway and Brigham Young University, and since 2016 it functions as a stand-alone development research lab at the College of William and Mary. AidData undertakes data collection and value addition activities, and publishes a series of data-products along two distinct lines: aggregate data, and project-level data.[23]

Overall assessment reports

- **The State of the Humanitarian System (SOHS)**[24]: published once every three years, the SOHS intends to give an overview of trends and performance in the humanitarian sector, from the perspective of those who receive aid as well as from those who work to provide it. The SOHS's assessment is based on four performance categories, drawn from the OECD-DAC evaluative

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[17] See www.fts.unocha.org/pageloader.aspx?page=AboutFTS-Introduction.
[18] Donors that are using the IATI platform include Austria, Canada, Denmark, European Union, Finland, France, Germany, Ireland, Japan, Netherlands, New Zealand, Spain, Sweden, Switzerland, United Kingdom, United States.
[19] See http://www.aidtransparency.net/about.
[20] See http://www.publishwhatyoufund.org/.
[21] See http://www.publishwhatyoufund.org/our-work/aid-transparency-tracker/.
[22] See http://aiddata.org/about-aiddatas-work.
[23] A full description of AidData's activities and products can be found here: http://aiddata.org/sites/default/files/dmp_public_version1.0_signed.pdf .
[24] The SOHS was piloted in 2010 (http://www.alnap.org/resource/8746), and has since been published in 2012 (http://www.alnap.org/resource/6565), and 2015 (http://www.alnap.org/what-we-do/effectiveness/sohs).

criteria, and adapted by SOHS to the specific humanitarian context:[25] coverage/sufficiency (is humanitarian aid covering needs?); effectiveness and relevance/appropriateness (was the response timely, and do interventions address priority needs?); efficiency, coordination and connectedness (do outputs reflect the most rational and economic use of inputs?); and coherence/principles (does the intervention adhere to core humanitarian principles and align with broader peace and development goals?.) These criteria are then considered in regard to four different functions of humanitarian action: response to massive sudden onset disasters, support to populations in chronic crisis, support resilience, and advocacy for crisis-affected people. The study compiles the latest statistics on the size and scope of the humanitarian system, synthesising the findings of formal evaluations, key informant interviews, and surveys. The four functions are also illustrated through four in-depth case-studies. Overall, the SOHS maps and assesses international humanitarian assistance at the system level, but it does not look at specific donors individually and systematically.

- **The Global Humanitarian Assistance (GHA) report:** conceived as "a leading resource for understanding financing for humanitarian crises globally",[26] it assesses the international financing response to humanitarian crises, looking at how much the response amounted to, where the financing came from, where it went, and through which channels it got there. The report also considers the extent to which the financing response measures up to identified humanitarian needs. The analysis in the GHA draws essentially on data reported to the OECD DAC, and to the FTS, but it also considers a range of other data sources, recognising their variation in the criteria for what can be included as humanitarian assistance, as well as the reported volumes (Development Initiatives, 2016, p. 84).[27] Significantly, following the new Sustainable Development Goals and the World Humanitarian Summit, the GHA 2016 is framed as a "contribution" to the process of putting these commitments into practice, by "making complex data and information on poverty, crises and the financial resources to tackle them clearer, more accessible and easier to act on" (Development Initiatives, 2016, p. 10). In light of this feasibility study, it is noteworthy that over the years, the GHA has increasingly endeavoured to undertake an assessment that also looks at qualitative aspects of aid.

Reporting on specific commitments

- **OECD-DAC peer review**: DAC members also agree to submit to a regular Peer Review of their development cooperation, undertaken by the DAC and the OECD/DCD. The objectives of DAC peer reviews are to improve the quality and effectiveness of development cooperation policies and systems, and to promote partnerships for better impact. This is achieved among other things through "holding DAC members accountable for the commitments they have made". Since late 2004, the OECD DAC Peer Reviews have a specific section on humanitarian assistance, which looks at efforts made by member to fulfil the GHD Principles.

- **Review of GHD Indicators:** As regards the monitoring of humanitarian donor commitments, the Good Humanitarian Donorship Initiative continues to provide an informal forum facilitating the

[25] The OECD-DAC evaluative criteria are available at http://www.oecd.org/dac/evaluation/50584880.pdf). See also SOHS 2015, Chapter 4.1: Assessment of performance.
[26] See http://www.globalhumanitarianassistance.org/reports/. The first issue of the GHA was published in May 2000. The latest issue is the GHA 2016: http://www.globalhumanitarianassistance.org/wp-content/uploads/2016/07/GHA-report-2016-full-report.pdf.
[27] A full list of the datasources in the GHA 2016, can be found on p. 88 of the report.

collective advancement of the GHD principles.[28] Mid-2012, GHD Initiative members agreed to undertake a self-assessment of donor performance against the GHD principles. The initial Review of GHD Indicators was completed in 2012, and it is now a regular function of GHD's co-chairmanship.[29] The self-assessment is based in a questionnaire, the results of which are then collated, and provided in the form of an indicator tracking table, and a compendium of good practices."[30]

- **CHS Verification Scheme** [31]: can be used by organisations providing humanitarian assistance to measure the extent to which they have successfully applied the CHS requirements. The Verification Scheme is managed by the CHS Alliance, and it offers four options of varying degrees of rigour and confidence in the results: self-assessment, peer review, independent verification, and certification. Each option is stand alone, but all four use the same indicators.[32] The **Humanitarian Quality Assurance Initiative (HQAI)** offers quality assurance services intended to demonstrate measurable progress in the delivery of humanitarian assistance, for example third party verification, and certification against the CHS.[33] Significantly, as the CHS is a voluntary initiative, independent verification or certification is not mandatory.

- **The Senior Transformative Agenda Implementation Team (STAIT)**: not a monitoring body *per se,* the STAIT was Created by the Emergency Directors Group (EDG) in 2014, to provide peer support to Humanitarian Coordinators and Humanitarian Country Teams in order to make the humanitarian response in the field more effective. In doing so, the STAIT focuses particularly on strengthening the three pillars of the Transformative Agenda, i.e. leadership, coordination, and accountability of affected people, and it does so through Operational Peer Reviews, sharing of learning and good practice, and informing policy processes.[34]

- **The European Commission evaluation of the European Consensus on Humanitarian Aid: t**he European Consensus on Humanitarian Aid Consensus came with an Action Plan running from 2008 to 2013, the implementation of which was evaluated in a final report that came out in June 2014 (ADE & Humanitarian Futures Programme, 2014). As the evaluation confirmed the validity of the approach, a new implementation plan was finalised in November 2015, and it now serves as the framework for actions undertaken in the field of humanitarian aid by the European Commission and Member States. As such, the implementation plan emphasises three priorities, namely: upholding humanitarian principles and International Humanitarian Law; a stronger needs-based approach; and enhancing coordination and coherence.

Indices and rankings[35]

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[28] See http://www.ghdinitiative.org/.

[29] See the latest such review (2015 Review of Good Humanitarian Donorship indicators, 16 May 2016), available at http://www.ghdinitiative.org/assets/files/Annual%20Reports/GHD-Indicators-questionnaire-2015-other-and-good-practices---final-may-1....pdf.

[30] See http://www.ghdinitiative.org/ghd/gns/activities/review-of-ghd-indicators.html. See also (GHD, 2013).

[31] See http://www.chsalliance.org/what-we-do/verification.

[32] The indicators can be found in the *Verification Framework, Core Humanitarian Standard on Quality and Accountability, 11 March 2016,* available at http://www.chsalliance.org/files/files/CHS_Verification_Framework.pdf.

[33] See http://hqai.org/.

[34] See the STAIT website, http://www.deliveraidbetter.org/.

[35] There are a number of indices that measure aspects of the humanitarian environment, but that do not include an accountability evaluation aspect. For example, the Index for Risk Management (inform-index.org) provides an evidence base for risk analysis in view of supporting decisions about preventions, preparedness and response, and the CAF World Giving Index (https://www.cafonline.org/about-us/publications/2015-publications/world-giving-index-2015) measures charitable behaviour across the world, focusing on volunteering and charitable donations.

- **The Commitment to Development Index (CDI)**[36]: compiled by the Centre for Global Development since 2003, the CDI ranks 27 of the world's richest countries on policies that affect the more than five billion people living in poorer nations. Foreign aid is only one of seven components of the CDI.[37] The objective is framed as intended to educate and inspire the public and policymakers, and to spark debate, and a "race to the top".[38] The index is supported by the CDI Consortium, which in 2015 included the following countries: Australia, Canada, Denmark, Finland, France, Germany, Norway, Sweden, and the United Kingdom. It is noteworthy that the 2008 issue of the HRI contained an article which looked at the history of the CDI, and the lessons it would offer for the HRI (Roodman, 2009). Roodman points to what he calls the "inherently impolite" nature of an index, and recommends that index makers develop two-way relationships, engaging with policy-makers and welcoming commentary. He also highlights that it is important that indices are clear in expressing their goals and limitations, and that their structure is accessible. They should also be able to capitalise on change while achieving stability.

- **The Humanitarian Commitment Scorecard**: launched by the International Rescue Committee "as the next step in a line of efforts to show what is and isn't happening along the lines of progress."[39] Using publicly available data from OCHA, the World Bank, and the OECD, the Scorecard measures current practices on commitment areas that have been publicly reported, focusing specifically on financing and resettlement. With regard to financing, it ranks countries in regard to humanitarian aid funding (in total and as a percentage of GNI) and in regard to their commitment to 'Better Aid'. Such commitment is captured through their work in terms of cash transfers, pooled funding, disaster risk reduction, and transparency, and in terms of whether or not they have signed up to the Grand Bargain. In order to allow for data consistency, the Humanitarian Commitment Scorecard only considers OECD-DAC members, and it focuses primarily on established and systematic quantitative indicators, while "recogni[sing] that there are many qualitative data points on policy changes" which it is hoped can be explored in future versions.[40]

- **The Aid Transparency Index (AIT)**: published for the first time in 2011 by the above-mentioned Publish What You Fund initiative.[41] By assessing the state of aid transparency among major donors, the Aid Transparency Index purports to track and encourage progress, while holding donors to account. AIT uses 39 indicators to monitor both the availability of aid information and the format it is published in.[42] The data used to compile the index is collected via the Aid Transparency Tracker.[43] The 2016 Aid Transparency Index[44] assessed 46 organisations, including 29 bilateral agencies, 16 multilateral organisations, and one philanthropic organisation. The donors were selected if they met at least two of three criteria: their annual spend is more than USD 1 billion; they have a significant role and influence as a major aid agency and engagement with the Busan agenda; and/or they are an institution to which government or organisation-wide transparency commitments apply.

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[36] See http://www.cgdev.org/cdi-2015.
[37] The six other components are aid, trade, finance, security, technology, migration, and environment.
[38] See http://www.cgdev.org/cdi-2015.
[39] See https://medium.com/rescue-aid/the-humanitarian-commitment-scorecard-1c65a813d61c#.uepzjshp2.
[40] *Ibid.* The datasources and methodology for the Humanitarian Commitment Scorecard can be found at https://rescue.app.box.com/s/6exdmm53v1pt0tjyi7bkyhklc503887q.
[41] See http://ati.publishwhatyoufund.org/.
[42] See the full methodology for the 2016 Aid Transparency Index here: http://ati.publishwhatyoufund.org/wp-content/uploads/2016/04/Technical-paper-2016-FINAL.docx . See also the full list of indicators, and how they are weighed here: http://ati.publishwhatyoufund.org/approach/indicators/.
[43] See the section on reporting platforms above. See also http://www.publishwhatyoufund.org/our-work/aid-transparency-tracker/.
[44] See http://ati.publishwhatyoufund.org/wp-content/uploads/2016/02/ATI-2016_Report_Proof_DIGITAL.pdf.

- **Punctual rankings of donor aid quality**

  - In a report entitled "**Quality of Official Development Assistance Assessment**" (Birdsall, Kharas, Mahgoub, & Perakis, 2010), Birdsall *et al* look at aid effectiveness from the angle of the measures that aid agencies control. They consider 30 indicators, across four pillars of aid: maximising efficiency; fostering institutions; reducing burden; and transparency and learning. Their sources are academic literature and consensus in the development community. Significantly, the authors highlight that they specifically "exclude consideration of humanitarian aid because it serves a different purpose from development assistance and because a Humanitarian Response Index already measures how countries do against a set of agreed-upon principles" (Birdsall, Kharas, Mahgoub, & Perakis, 2010, p. 4). Nonetheless, they go on to recognise that "[m]any of our indicators are of course also relevant to the quality of humanitarian assistance" (Birdsall, Kharas, Mahgoub, & Perakis, 2010, p. 4).

  - In 2010, the World Bank Development Research Group published an index by Knack *et al,* in an article entitled "**Aid Quality and Donor Rankings**" (Knack, Rogers , & Eubank, 2011). Knack *et al* offer new measures of aid quality covering 38 bilateral and multilateral donors They also discusse the robustness and usefulness of such measures, albeit from a development rather than humanitarian viewpoint. Using 18 underlying indicators derived from the OECD-DAC's Survey for Monitoring the 2008 Paris Declaration on Aid Effectiveness, the abovementioned AidData database, and the DAC aid tables, the authors suggest an overall aid quality index. Interestingly, the authors argue that the indicator set they provide is more comprehensive and representative of donor practices than previous donor rankings,[45] for example by increasing the validity of the aid quality indicators by adjusting for recipient characteristics, and donor aid volumes. Nonetheless, the authors also caution against over-interpreting such indices, since alternative plausible assumptions regarding weights or the inclusion of additional indicators can produce marked shifts in the ranking of some donors. In the article, the authors provide one overall ranking on aid quality, and four sub-indices (on aid selectivity, alignment, harmonisation, and specialisation), and they find that since the performance of some donors varies significantly across the sub-indices, these may be more relevant than the overall index when it comes to identifying relative strengths and weaknesses of donors.

  - In an article from 2011 entitled "**Rhetoric versus reality: the best and worst of aid agency practices**" (Easterly & Williamson, 2011), Easterly and Williamson take measure of donor's (including bilateral, multilateral, and UN agencies) adherence to best practices, as defined by aid agencies and based on aid transparency, specialisation, selectivity, ineffective aid channels, and overhead costs. They then rate the absolute performance of donors, using equal weightings and accounting for trends over time. Again, the focus of this index is essentially on development aid, though they do also take into account for example food aid, recognising that it is often given for humanitarian purposes as opposed to development purposes (Easterly & Williamson, 2011, p. 52).

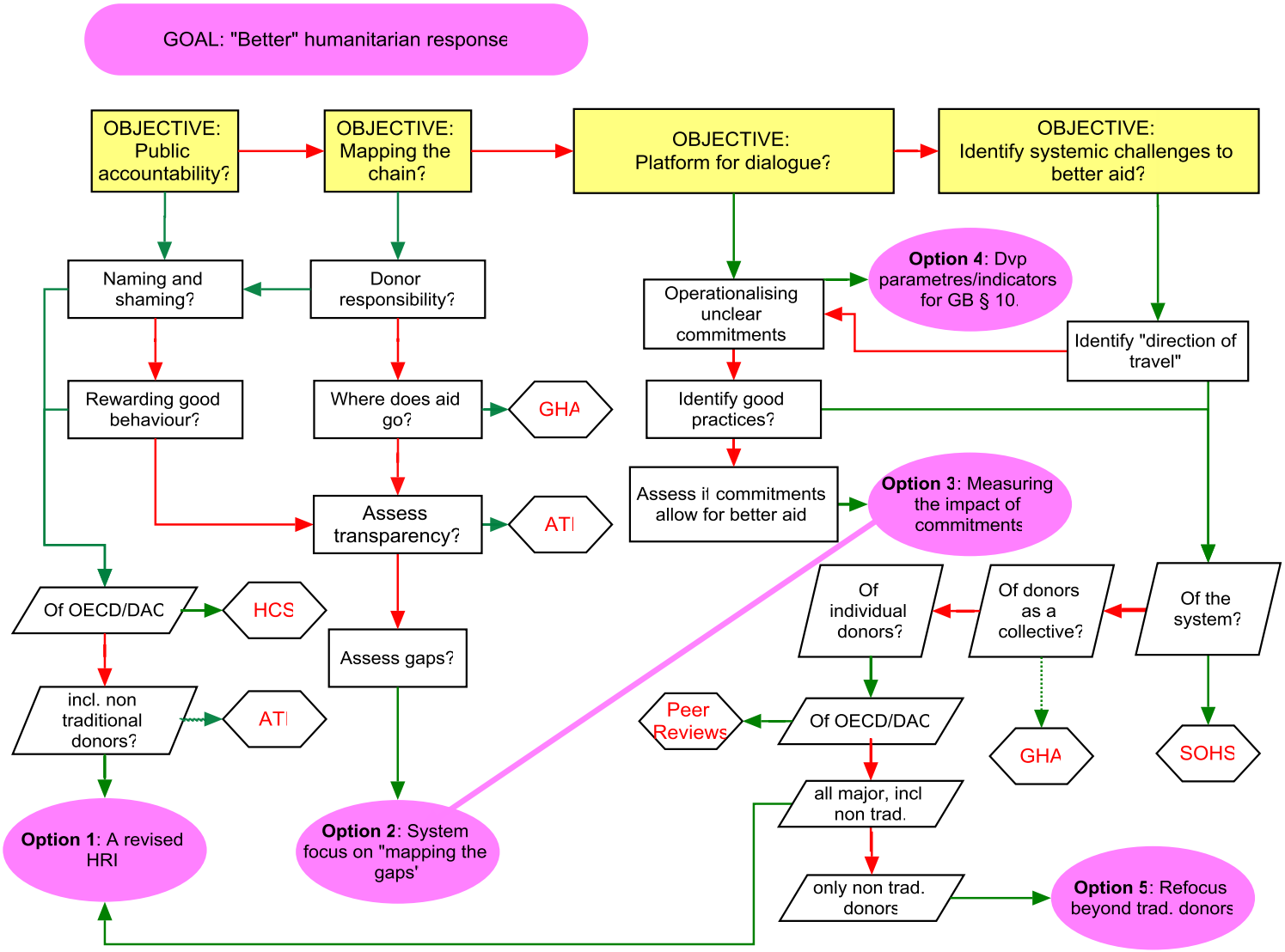
- **Access to Medicine Index**[46]: published bi-annually since 2008, this index independently ranks pharmaceutical companies' efforts to improve access to medicine in developing countries. The access to medicine problem is multifaceted, just like the access to aid problem, and the responsibility of pharmaceutical companies to work towards an improved access to medicines can be seen as analogical to that of donors, and their role in view of a better humanitarian response. The idea behind the Access to Medicines Index is to provide pharmaceutical companies with a

[45] The authors make no mention of the HRI.
[46] See http://www.accesstomedicineindex.org/what-index.

transparent means by which they can assess, monitor, and improve their own performance, and also to provide a basis for multi-stakeholder dialogue. The Index uses a weighted analytical framework to capture and compare data from the top 20 research-based pharmaceutical companies, across a set of countries, diseases, and types of products. The framework looks at seven areas of focus, which cover areas that experts have deemed the most important for access to medicine. For each of these seven areas, each company is then assessed for four aspects of action: commitment, transparency, performance, and innovation.[47] While the Access to Medicine Index is clearly different from a potential HRI 2.1 in view of its subject matter, it is interesting to bear in mind as an HRI could be conceived as an "Access to Aid Index", evaluating the commitment, transparency, performance, and innovation of donors regarding specific areas deemed significant by experts.

[47] See the most recent index methodology, available at http://www.accesstomedicineindex.org/sites/2015.atmindex.org/files/methodology_report_2013_for_the_2014_access_to_medicine_index_6.pdf.

Annex 6: Flowchart – HRI2.0 Objectives and options



Annex 7: Table of options – a comparison

The table below summarises the objectives and approaches of the options suggested by this study, as well as the preconditions that each option would appear to require.

	Why (Objective)	What (Scope)	How (Approach)	Preconditions	Comment
Option 1	Public Accountability Watchdog.	Revise the HRI: evaluation of donor performance based on top 10 donors having signed GB+GHD.	Integrate a number of different operational modalities. Align with existing mechanisms that have developed commonly accepted indicators.	Buy-in from the donor community, particularly for access to information. Considerable funding for triangulation of research approaches.	The precise need is unclear in view of the already crowded space. Could possibly work in complementary fashion with OECD/DAC peer reviews. Restricted funding opportunities.
Option 2	Mapping the chain.	Develop a tool to map gaps in the funding chain.	Contrasting existing needs assessments with data on aid-flows. Desk research to compile publicly available information and engagement with humanitarian community to develop mapping tool	Review of what can be done with publicly available data. Relatively little funding in view of focus on desk-based research.	Could be a relatively small project resulting in a tool that can be useful for much of HERE's work. Looking only at the funding chain may not be enough however. It would likely overlap with the work done by Development Initiatives.
Option 3	Platform for dialogue / system analysis.	Measure the impact of commitments.	Cycle of real-time context analyses, including perception studies targeting also affected populations.	Carefully thought through baselines for impact assessment. Adequate funding for field research. Partnerships? Operationalisation of unclear commitments (see Option 4).	Appears a good fit for HERE's mission, and a valuable endeavour. No similar efforts have been highlighted.
Option 4	Platform for dialogue / system analysis.	Operationalise commitments re the relationship between humanitarian and development work.	Desk-research, triangulated by a selection of context analyses, and workshops with stakeholders.	Engagement from representatives of the humanitarian community. Adequate funding for some field research.	Good fit for HERE's mission. Interesting link to the Mandates Study. Would be a valuable basis for Option 3.
Option 5	Platform for dialogue / system analysis.	Clarify the accountability role of non-traditional /private donors.	Work with a group of interested private/non-traditional donors to clarify definition of quality funding (also based on existing commitments).	Engagement from interested private donors. Relatively little funding in view of focus on desk-based research.	Could be a relatively small side-project, benefitting from HERE's nascent collaboration with a group of private foundations.