Independent quality assurance and the humanitarian sector: a history

HUMANITARIAN QUALITY ASSURANCE INITIATIVE

Humanitarian quality assurance: the origins

In September 2000 in an issue dedicated to globalisation, *The Economist* questioned the legitimacy of those organisations involved in the anti-globalisation protests of the time. Its editorial column read:

> *"The increasing clout of NGOs [...] raises an important question: who elected [them]? Bodies such as these are, to varying degrees, extorting admissions of fault from law-abiding companies and changes in policy from democratically elected governments. They may claim to be acting in the interests of the people — but then so do the objects of their criticism, governments and the despised international institutions. In the West, governments and their agencies are, in the end, accountable to voters. Who holds the activists accountable?"*[1]

This was not the first time the accountability of non-governmental organisations and actors had been questioned, nor would it be the last. Indeed, much thinking over the past 30 years has been poured into trying to understand the power dynamics in which NGOs operate. Yet, close to a decade after *The Economist* leader was published, such questions persist: both international and national NGOs remain the focus of intense scrutiny over their power, performance, legitimacy and accountability.

For those working in humanitarian contexts, these questions have become urgent: the negative consequences of responses in Rwanda, the Democratic Republic of the Congo, Haiti and Pakistan, and the ongoing and highly publicised sexual abuse scandals involving staff from some of the world's biggest NGOs, have seen the erosion of public trust in the humanitarian system. Médecins Sans Frontières perhaps best articulated these concerns in 2014, when the organisation published a report which stated: "While the humanitarian system has grown massively in recent years, this has not led to a proportionate improvement in performance during emergencies".[2]

Yet, in spite of such criticism, the sector is booming: between 1977 and 2007, the percentage of Official Development Assistance (ODA) spent on humanitarian activity rose from 3% to 14%.[3] In 2017, it was estimated that humanitarian funding topped US$27.3 billion.[4]

Greater funding has led to demands for more transparency in the way in which donor money is being spent. But the increased role and power of humanitarian organisations in international affairs – and the increasing media glare under which humanitarian actors operate – has, over the past three decades, resulted in an evolution in the way in which the humanitarian sector has come to think about who it operates for and how it is held to account. And spearheading that evolution has been efforts to put populations in crisis, those people for whom the humanitarian sector exists, at the heart of the accountability matrix.

As a term, accountability to affected populations (AAP) has come to encompass a wide range of activities that aim to improve humanitarian performance and empower populations to hold humanitarian actors to account – much of which has since been incorporated into the nine commitments of the Core Humanitarian Standard on Quality and Accountability[5] (CHS). Indeed, there is now significant evidence to suggest that accountability to affected populations improves the overall quality of the response.[6] And few working in the humanitarian sector (or, indeed, outside it) would argue against such efforts. Accountability is held to matter "because we are morally obliged to use the resources held in trust for other people according to the wishes and best interests of those people. We are also morally obliged to show that we have done so".[7] Yet, while almost every humanitarian organisation working today is at pains to emphasise their commitment to accountability to affected populations, far fewer are able to objectively demonstrate those commitments are being met.

Launched in 2015, the Humanitarian Quality Assurance Initiative (HQAI) is the culmination of many decades of work spent developing a mechanism to measure the extent to which humanitarian service providers are fit for purpose and their work accountable to some of the world's most vulnerable people, but also to their other stakeholders – donors, host populations, and, indeed, their own staff. Through a system of independent quality assurance that assesses the degree to which implementation of the CHS (and, therefore, best practice on accountability to affected populations) has been successful, HQAI is able to determine the performance of humanitarian actors, and suggest ways in which they can improve.

Getting to such a point has been a journey. One that the authors of one of the key documents in the history of humanitarian accountability, the 1996 Joint Evaluation on Emergency Assistance to Rwanda (JEEAR), could scarcely have imagined when they concluded: "The current mechanisms for ensuring that NGOs adhere to certain professional standards are inadequate."[8] This document explains how we got from the JEEAR to here.

1996

The Joint Evaluation on Emergency Assistance to Rwanda is published, detailing wide-ranging reforms needed for humanitarian actors to become more accountable.

2003

The Humanitarian Accountability Partnership (HAP) is formerly established in Geneva; a group of 17 donors endorses the Principles and Good Practice of Good Humanitarian Donorship.

Raising the standard: the origins of accountability in the humanitarian sector

The apparent ubiquity of regulatory mechanisms in the humanitarian sector today does much to mask their very recent absence. In 1990, the term accountability to affected populations (AAP) was niche, confined primarily to emerging humanitarian academia. To humanitarian policymaking it was marginal, with just six initiatives working on the issue at the time.[9] By 2012, the Joint Standards Initiative counted 70 competing standards in the sector, with at least 42 organisations and projects working specifically on accountability to affected populations.[10]

Credit for this vast expansion in the humanitarian accountability architecture can be traced back to the recommendations of the 1996 Joint Evaluation on Emergency Assistance to Rwanda (JEEAR). The report documented the shortcomings of organisations involved in the Rwanda response, which included poor coordination and low accountability to genocide survivors. It concluded: "[T]he present accountability mechanisms within the humanitarian aid system are quite inadequate [...] While accountability to donors is important, it should not be forgotten that relief agencies should also be accountable to the populations they are seeking to assist."[11]

No other recommendation in the report had quite such a transformational effect on the humanitarian system. Between 1997 and 2004, many of the cornerstone initiatives of the humanitarian quality and accountability architecture were launched, including the Active Learning Network for Accountability and Performance (ALNAP), People In Aid, the Sphere Project, Management Accounting for Non-Governmental Organisations (MANGO), the Humanitarian Accountability Partnership (HAP – the precursor to the CHS Alliance and HQAI), Groupe URD's Quality & Accountability COMPASS, and the Good Humanitarian Donorship (GHD) initiative.

The founding of these initiatives coincided with a growing drive to professionalise the sector, and a dawning recognition of the impact of unintended consequences of humanitarian action and the potential for abuse. It also coincided with a drive from donors to create new mechanisms that would help improve humanitarian outcomes.

Accountability to affected populations, though buoyed by a growing body of theory, still struggled to find traction when it came to a consolidated and coherent body of best practice for humanitarians to engage with. As Paul Knox-Clarke and John Mitchell explain: "For the humanitarian system to be accountable everyone within that system must have a common understanding of what accountability to affected populations means. This requires a common understanding and set of commitments, as well as a practical way to take these commitments forward."[12] The vehicle for convergence upon an agreed definition and set of commitments was the first HAP Standard in Accountability and Quality Management, published after a sector-wide consultation in 2007 and revised in 2010.

Standards, pervasive in almost every professionalised industry but to this point rare in humanitarian work, quickly became more commonplace as actors sought to influence those setting the standards.[13] In 2011, the Emergency Capacity Building Project's five key elements of accountability were published, and that same year the IASC Commitments on Accountability to Affected Populations were adopted. While the terminology of each differed, the requirements of those committed to each were aligned. For the first time the humanitarian sector had a common framework from which actions relating to accountability to affected populations could be derived.

2007

The 2007 HAP Standard on Accountability and Quality Management is launched.

2012

The Joint Standards Initiative (formed by HAP, People In Aid and the Sphere Project) starts a global consultation looking at making humanitarian standards simpler to use and more coherent; the Steering Committee for Humanitarian Response (SCHR) initiates a project to explore the relevance and feasibility of certification for humanitarian organisations.

Consolidating best practice: the Core Humanitarian Standard


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The growth in standards, however, did not immediately translate into better humanitarian action. The responses to the 2010 earthquake in Haiti and floods in Pakistan highlighted the gaps between the aid that was needed and that which was provided. It also demonstrated that, while accountability to affected populations was widely discussed, it was yet to be widely practiced. Indeed, the proliferation of standards in the sector was seen to be exacerbating the problem and sowing seeds of confusion as to what standards needed to be implemented, and by whom.

A move towards greater coherence in humanitarian standards began in 2006 with the creation of the Quality and Accountability Initiatives Complementarities Group, which looked to better understand parallels in three of the most widely used standards in the sector: the HAP Standard, the People In Aid Code of Good Practice and the Sphere Core Standards.

In 2012, the Humanitarian Accountability Partnership (HAP), People In Aid and the Sphere Project convened the Joint Standards Initiative with the aim of making standards easier to understand and implement for those working in humanitarian emergencies. The global consultation, which took into account the views and feedback of more than 2,000 humanitarian and development practitioners, concluded that humanitarian standards needed to focus on humanitarian principles and affected populations, be better harmonised, contain agreed upon terminology, come with better guidance, and be linked through a common humanitarian standards architecture.[14]

One of the key outcomes of the process was the commitment to develop a core standard to replace the 2010 HAP Standard, the People In Aid Code of Good Practice and the Sphere Core Standards. After a worldwide consultation to which many thousands of humanitarian and development professionals, academics, thought leaders and – crucially – members of affected populations contributed, the Core Humanitarian Standard on Quality and Accountability (CHS) was field tested and then launched in Copenhagen in December 2014.[15] To better support the promotion of and the service provision around the CHS, in 2015 HAP and People In Aid merged to form the CHS Alliance.

The CHS marked a turning point for the sector. Never before had the development of a core humanitarian standard been influenced by such a broad range of humanitarian actors. Indeed, never before had a core humanitarian standard been influenced by affected populations. And never before had a standard been so widely adopted by the humanitarian system – an adoption that continues apace.

Since its launch, the CHS has reached a number of significant milestones: at the 2016 World Humanitarian Summit, more than 90 stakeholders signed a pledge to adopt the commitments of the standard;[16] in December 2017 the Inter-Agency Standing Committee (IASC) principals endorsed a revised version of the Commitments on Accountability to Affected People and Protection from Sexual Exploitation and Abuse (CAAP) so as to reflect a number of key developments, among them the launch of the CHS.[17]

A further milestone was reached in 2018, when the revised Sphere Handbook was

2014

Following recommendations of the Joint Standards Initiative, the Core Humanitarian Standard (CHS) is launched.

launched incorporating the CHS as one of its key foundational chapters, formally replacing the Sphere Core Standards.[18] In addition, at the UK government-hosted Safeguarding Summit in 2018, 22 countries committed to "demonstrate adherence to [...] the CHS and [...] look to review and strengthen measures for verification of that adherence."

But perhaps the greatest achievement of the CHS is that it represents the strongest incentive to date for humanitarian organisations – and those organisations with differing mandates – to open themselves up to scrutiny by external actors. Its transformative potential lies in the fact that it has been designed so that its application can be measured, meaning it is a standard against which performance and accountability can be assessed. And it is the CHS verification scheme and the concomitant independent quality assurance pathways that are driving some of the most exciting improvements in accountability and performance.

> *"Never before had a standard been so widely adopted by the humanitarian system – an adoption that continues apace"*

2014

The SCHR Certification Review concludes, recommending: "a new organisation [be] established with a mission and focus on providing external verification and certification services to NGOs and interested stakeholders, assessing against the CHS commitments".

2015

HAP and People In Aid formally merge to create the CHS Alliance.

Independent quality assurance and humanitarian standards

Although the adoption of standards in the humanitarian sector has been widespread and is growing, efforts to measure compliance with such standards have, until recently, been less prominent. HAP – credited with being the humanitarian sector's first self-regulatory body – pioneered verification against the 2007 HAP Standard, with the first organisations to be HAP-certified becoming so in 2008. People in Aid followed suit with a two-tiered Quality Mark, demonstrating levels of compliance with its Code of Good Practice, which outlined seven principles for effective people management in humanitarian and development contexts.

However, external quality assurance of standards took time to take hold. In spite of having more than 100 member organisations, in the eight-year duration of HAP's certification scheme, 18 organisations were certified. Meanwhile, People In Aid's Quality Mark suffered a similar fate, with low uptake impeding progress. Part of the problem with verifying compliance with standards was that the concept of self-regulation was poorly articulated in the sector. A self-regulatory organisation, "is a non-governmental organization which has the power to create and enforce stand-alone industry and professional regulations and standards."[19] However, in the complex and emerging matrix of standards in the humanitarian sector, there was little agreement as to which organisation had the power assess the standard implementation of others.

The Sphere Project was the first organisation to be created as a direct result of the 1996 Joint Evaluation on Emergency Assistance to Rwanda (JEEAR). Sponsored by the Steering Committee for Humanitarian Response (SCHR) and Interaction, the first Sphere Handbook outlining minimum standards in four key operational areas was launched in 1998 and has since become widely recognised and much used. But, while the standards are prescriptive, no attempt has yet been made to create a mechanism to systematically monitor and externally assess their implementation. Instead, self-regulation came to mean self-assessment.

And yet even during the origins of the global push for greater accountability, the authors of the JEEAR were conscious of "a more disturbing problem [...] that in a context of increased concern for profile by, and competition between, humanitarian agencies, the objectivity of their reporting may suffer as a result of their emphasis on the positive aspects of their programmes and playing down of the negative."[20] Self-assessment, while playing a useful role for any organisation in internal learning and benchmarking, is no substitute for rigorous external assessment.

Indeed, there are legitimate reasons for the humanitarian sector to be cautious of regulation. External regulation by host governments has been known to result in restricted access, and has driven the political economy of conflict through the costly registration of NGOs.[21] Certification systems have, at times, been considered unaffordable for small NGOs with limited resources.[22] And there have been some fears that independent verification of compliance with standards could, "perversely make organisations more risk-averse, bureaucratic and less agile in meeting urgent needs in challenging crisis situations. The argument is that organisations will tend to focus more on meeting external audit requirements, rather than meeting their mission and objectives."[23]

And yet, independent quality assurance of compliance against standards has also shown to have tremendous benefits, both for those undergoing the quality assurance, and for their clients. From outside

the sector, a "United Nations Industrial Development Organisation (UNIDO) study of 600 businesses in over a dozen Asian countries found that there are 'clear empirical economic benefits to the effective implementation and accredited certification of quality management systems' for certified organisations. Indeed, 98% of the businesses surveyed reported that certification represented a good return on investment, and a clear majority claimed that 'surveillance audits support continuous improvement'."[24]

Independent evaluations of People In Aid's certification scheme against their Code of Good Practice concluded that the scheme instituted "a continuous cycle of improvement" with improved programming and organisational effectiveness.[25] And a review of certification against the HAP Standard in 2013 concluded that HAP-certified organisations "saw HAP certification as a useful tool and a structured approach to identify progress in embedding accountability within organisational culture, systems and processes, in staff competences and practice improvements [...] taking the decision to go for certification and moving through the process did positively impact on the pace and reach of organizational change, including stronger management buy-in."[26]

Indeed, if the implementation of standards was designed to institute sector-wide systematically improved performance and accountability, then measuring such implementation would appear invaluable. Not least because of the way in which humanitarian organisations operate – in states of urgency in highly politicised and polarised contexts – is known to contribute to reinforcing the power differential between the organisations delivering assistance and protection and the people they aim to serve. The only way to systematically reduce the chance that this power differential is exploited is for organisations to implement a

2015

The Humanitarian Quality Assurance Initiative (HQAI) is launched.

2016

HQAI grants the first five certificates of compliance with the CHS to Church of Sweden, Naba'a, Tearfund, CAFOD and Christian Aid.

> *Organisations that participate in external verification processes are more likely to consistently apply good practices and quality standards*

standard such as the CHS, and be willing to objectively demonstrate that they have successfully done so.

While the CHS was under development, another project was busy investigating the impact of humanitarian certification schemes. Soon they would converge. The SCHR Certification Review Project set out, in 2012, to explore the relevance and feasibility of certification for humanitarian organisations as a means to demonstrate application of humanitarian principles, and promote improved quality, accountability and effectiveness of aid efforts. Lead author, Philip Tamminga, wrote: "One of the shortcomings of many of the standards initiatives in the humanitarian sector has been the lack of robust monitoring, reporting and verification systems to help track and assess how standards are being used, and with what results."[27]

Over the course of two years, the Certification Review conducted extensive interviews, focus group discussions and consultations with hundreds of representatives from NGOs, UN agencies, governments and donors. It carried out a comprehensive literature review and several scoping studies of experiences in the humanitarian and other sectors around standards and certification mechanisms. In addition, four field-based case studies tested and validated the feasibility and relevance of a draft certification model in different crisis contexts.[28]

The Review concluded: "Independent third-party verification and certification of organisations engaged in humanitarian action leads to more consistent action and better accountability to populations affected by crises. External verification improves the quality and accountability of an organisation's assistance by reinforcing internal quality assurance processes, promoting good practices and identifying areas for improvement. Organisations that participate in external verification processes are more likely to consistently apply good practices and quality standards as they are regularly and systematically assessed against agreed standards."[29]

The review also found a strong appetite for independent verification and quality assurance among humanitarian organisations requiring a model that was relevant, feasible, accessible and affordable for NGOs, and which was complementary to existing processes to support quality, accountability and continuous improvement.

Three scenarios were proposed: outsourcing the verification services to a commercial audit and consulting firm; accrediting and licensing existing NGO certification systems at the national level to undertake certification against the CHS; and establishing a separate non-profit organisation with a focus and mission on delivering independent quality assurance for those implementing the CHS. The first was seen as costly, inconsistent in quality, and problematic – many commercial enterprises simply did not understand the dynamics of humanitarian action sufficiently well to be of service. The second system of national certification bodies was viewed as being overly complicated.[30]

Therefore it was by broad agreement among humanitarian organisations, donors and actors that a new and dedicated organisation would need to be established. That new organisation, launched in 2015, was the Humanitarian Quality Assurance Initiative (HQAI).

2017

HQAI's Subsidy Fund, supporting those organisations that would otherwise not be able to undertake one, is launched – with the first funds awarded to organisations in Bangladesh and Ethiopia.

2018

HQAI becomes accredited against the ISO/IEC 17065:2012 standard for bodies providing audit and certification against products, processes and services.

The work of the Humanitarian Quality Assurance Initiative

The Humanitarian Quality Assurance Initiative (HQAI) remains the humanitarian sector's only body committed to promoting improved performance and accountability through independent quality assurance. And it is the only body auditing those organisations that are looking to better understand the extent to which they have successfully implemented the nine commitments of the Core Humanitarian Standard on Quality and Accountability (CHS).

To date, the services of HQAI have been used by more than 55 organisations of differing sizes, mandates and from different regions. This is many times the number of organisations that engaged with HAP certification over its eight-year lifespan. Launched almost exactly 20 years after the publication of the Joint Evaluation on Emergency Assistance to Rwanda (JEEAR), HQAI has come to represent the fullest expression of accountable humanitarian action yet defined in the sector.

And not just humanitarian – as the CHS extends its reach and is implemented across multi-mandated organisations, it has proved to be just as efficacious at embedding quality and accountability to affected populations in contexts outside those strictly defined as 'humanitarian'. The increasing number of development and advocacy actors seeking services from HQAI are demonstrative of both the burgeoning interest in the CHS, and the robustness of HQAI's auditing system, which is flexible enough to assess the implementation of standards in wildly differing contexts.

HQAI has also taken significant steps to address those concerns that the sector's first certification scheme – that of HAP – first raised. Responding to calls to ensure independent quality assurance is accessible to all actors, HQAI has established two mechanisms to enable smaller organisations and those with severe budgetary constraints to access the continuous learning and improvement afforded by compliance assessments: a subsidy fund,[31] which can be used to cover up to 90% of the cost of an audit; and a Group Scheme,[32] which enables federated and smaller organisations to be audited collectively, reducing the price for each organisation.

Furthermore, HQAI works closely with donor governments and other funding bodies to achieve alignments of donor due diligence requirements using the CHS as reference. This means HQAI audits are increasingly being recognised and recommended by donors: independent quality assurance against the CHS is now a prerequisite for organisations looking to obtain funding from the Ministry of Foreign Affairs of Denmark[33] and the UK's Disasters Emergency Committee,[34] while organisations verified by HQAI can now have streamlined access to Framework Partnership Agreements from the German government and the Directorate-General for European Civil Protection and Humanitarian Aid Operations (ECHO).[35]

Meanwhile, HQAI's ability to tailor audits to donor requirements on quality and accountability is spearheading the drive for greater simplification and harmonisation of reporting requirements across the humanitarian sector.

There is now clear evidence that independent quality assurance confers significant reputational benefits on those organisations that undertake it: with donors, with partner organisations and among the communities with which organisations work.

16 organisations of the ActionAid family become the first group of organisations to undergo independent verification against the commitments of the CHS, following the launch of HQAI's group scheme. The group scheme enables a number of organisations to be audited collectively, reducing the cost for each.

HQAI has also gone one step further: modelled on similar bodies in other sectors, HQAI has been accredited against the ISO/IEC 17065:2012 standard for entities providing audit and certification against products, processes and services. This means that its CHS certification scheme meets the requirements set by the International Organization for Standardization – indicating the scheme is internationally recognised for its robustness, objectivity and independence.

While no data regarding an organisation's assessment is released without consent, the data from all those having undertaken any of the independent quality assurance pathways (benchmarking, independent verification and certification)[36] can be aggregated to understand overall trends in the sector. Owing to the number of organisations it has audited, HQAI is one of the few organisations to possess identical data sets on indicators relating to quality and accountability from a broad range of different organisations collected at regular intervals during the auditing cycle. In the coming years, HQAI will be conducting some of the first empirical research into the impact of independent quality assurance on humanitarian organisations' service provision to affected populations.

> *"HQAI audits are increasingly being recognised and recommended by donors"*

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35 See clause 4.4.7 in the Terms of Reference for the Ex-Ante Assessment of a Non-Governmental Organisation Applying to Become a Humanitarian FPA Partner of the European Commission (as represented by DG Echo), which can be downloaded here: http://bit.ly/34MZvQ0
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