Applying impartiality in Humanitarian Action
A single actor perspective

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In collaboration with HQAI and the Graduate Institute

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This report emerges from a research partnership between the Humanitarian Quality Assurance Initiative and the Graduate Institute for International and Development Studies in Geneva.

The Humanitarian Quality Assurance Initiative (HQAI) provides quality assurance services that demonstrate measurable progress in the delivery of humanitarian assistance within the international humanitarian community. The initiative’s prime motivating factor is to bring quality and accountability to affected populations and other stakeholders.

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EXECUTIVE SUMMARY

The principles of **humanity, impartiality, neutrality and independence** are at the core of humanitarian action. This report focuses on the application of **impartiality**, a principle which calls on humanitarian actors to make aid proportional to need, and to ensure non-discrimination in their assistance. While most visible on the field level, impartiality should guide decision-making across all levels of an organization, including globally. We show that impartial delivery of aid is dependent on the extent to which an organization is impartial in its operations (in terms of systems and organizational culture). Even an organization which runs a very impartial operation can be prevented from delivering fully impartial aid to those most in need, however (see illustration below), in encountering obstacles beyond its control. This report encourages organizations to push back against obstacles such as non-impartial funding and gaps in coordination.

To facilitate application of impartiality throughout organizational operation (structures and culture), we present a model of operationalized impartiality, which identifies areas worth of scrutiny. This model is also proposed for use during the quality assurance processes against the Core Humanitarian Standard. We aim to maximize incentives for organizations to push their processes and goals towards the most impartial operation possible. Organizations interested in self-assessment as well as HQAI auditors are provided with 9 elements of impartial operations spread throughout the organization, in three broad categories: the organizational identity (goal and strategies), information gathering and coverage, and in organizational culture.

**Ideal case-scenario:**
An organization has systems and culture in place that make it operationally impartial. It does not encounter external obstacles to impartiality, thereby delivering fully impartial assistance. (This is unlikely.)

**Aspirational impartiality**
An organization has systems and culture in place which enable it to actively push against and overcome obstacles. Such organization is able to deliver fully impartial assistance to those in need.

**Limited impartiality**
An organization has systems and culture in place which enable it to actively push against obstacles. It nevertheless is unable to overcome all external obstacles and its aid is not fully impartial.

**Non-impartiality**
An organization does not have systems and culture in place which would support it delivering impartial assistance. Regardless of external forces, it does not succeed to deliver impartial aid.
This project also aimed at evaluating the existing tools for quality assurance in humanitarian organizations. The Core Humanitarian Standard was used as a reference, since it is based on the four humanitarian principles, including impartiality. An analysis of CHS requirements is presented in order to identify areas where focus on impartiality may be strengthened. We find that aspects critical to impartiality can be identified in six of the nine commitments, and in 21 requirements of the CHS. The CHS is especially strong in its emphasis on the requirement for policy commitment to impartiality, an emphasis on needs-based resource allocation, and the referral of unmet needs to other relevant actors. Three central gaps are found, however, in relation to ensuring staff understanding of the principles, comprehensively addressing constraints that hinders an impartial response, and in the lack of reference to impartiality on a global level.

Recommendations
(Primarily for the HQAI Quality Assurance process and training)

- Focus advocacy and measurement efforts on donor impartiality and impartiality in collective coordination efforts.
- Develop a shared understanding of the humanitarian principles and their operability among HQAI auditors and staff. Train auditors in humanitarian principles (theory and operationalization) during Auditor training to ensure these are actively considered during all audits, despite need to adapt to specific organizational set-ups.
- Develop a shared understanding of how organizational theories inform application of the humanitarian principles among HQAI auditors and staff. Training auditors in modern organization theories will enable them to evaluate the alignment between organizational identity, goals, and practices.
- Use visuals to map the sequence of organizational actions and operations in order to have a snapshot view of the organizational operations and a verification tool.
- Involve auditors who come from outside the humanitarian sector in HQAI audits to assess the organizational culture.
- Update Audit tool to support the evaluation of an organization’s operational impartiality.
Humanitarian actors work hard to respond to crises across the globe. Their work often takes place under complex circumstances comprising many unknown elements. Time is scarce, however, and life-saving decisions regarding assistance need to be made. In circumstances such as these, humanitarians rely on the principles humanity, neutrality, impartiality, and independence. Despite their broad recognition, however, it is difficult to always fully operationalize each of the principles – at times they might be in contradiction, or their achievement might be unrealistic given external constraints.

Contributing to the momentum of self-reflection across the humanitarian sector, many have recently raised their voices to examine to what extent we walk the talk. Initiatives such as the collaborative development of the Core Humanitarian Standard in 2015 have highlighted the need for accountability. Risks associated with non-application of the humanitarian principles jeopardize not only the objectives of humanitarian efforts, but also the safety of individual field officers, and the credibility of the sector as a whole. While the principles are already well spread through mission statements and resonate deeply with the humanitarian culture, the sector has not yet completely translated this mantra into tangible operational elements across all levels of the humanitarian architecture.

These circumstances brought together the Humanitarian Quality Assurance Initiative and the Graduate Institute of International and Development Studies to jointly commission a research project focused on the practical application of the principle of impartiality. The research team was asked to develop a framework for measurement of the application of impartiality in humanitarian organizations, and while quantification of organizations’ adherence to the principle would have certainly been achievable, a different approach seemed more productive: Because the full application of impartiality is constrained by external issues, what really matters is whether and how organizations are prepared to face constraints and achieve the most impartial delivery possible in a given context.

This report examines impartiality from the point of view of a single organization. It outlines how an organization can strengthen its policy, processes, and organizational culture to consistently and systematically support impartial delivery of assistance to those most in need. Its recommendations are aimed at individual humanitarian organizations engaged at the end of the direct assistance delivery chains (INGOs, NGOs, UN Agencies...). That said, the role of all actors within the sector – donors, coordination and certification bodies – is also considered.

In presenting its conclusions, this research stands on the shoulders of giants. We expand on the SCHR Impartiality Review and the benchmarks it proposed. Most importantly, our perspective is largely informed by the CHS standard and related initiatives. A significant portion of our efforts focused specifically on identifying the extent to which an audit against the CHS standard can provide information on an organization’s application of impartiality. We hope our work can resonate with the present conversation, and contribute to an even more principled humanitarian action worldwide.

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1 SCHR (2014), Impartiality Review: report of findings.
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The objective of this study is to examine to which extent existing tools are able to capture the application of principle of impartiality by organizations. **We ask:**

- How can the principle of impartiality be operationalized?
- What are the internal and external factors determining organizations’ ability to provide impartial assistance?
- How could the application of principle of impartiality by organizations be measured?
- Do the 9 Commitments of the CHS standard effectively capture the principle of impartiality?

In addressing these questions, the research team employed a triangulated approach, combining a rigorous review of current literature and practice with first-hand accounts from experts and humanitarians across different hierarchies of the sector. Specific attention was given to the tools currently used to evaluate the accountability and practice of organizations, cross-referencing in particular different sources of knowledge on the Core Humanitarian Standard. The analytical framework enabling the analysis of organizational policy, processes, and culture was constructed from the systems theory of social institutionalism. The study’s methodology, theory, and sources of primary and secondary data are described in detail in Annexes I and II.

**The audit setting**

In addition to this public report, the research project aimed at delivering a series of tools for future use within the audit process conducted by the Humanitarian Quality Assurance Initiative. HQAI audits organizations against the CHS standard. The tools include a set of recommendations for the organization, largely concerning the process of auditor training, as well as new training materials introducing the humanitarian principles through the lens of organizational theory.

**Limitations:**

While the choice to focus on single-actor perspectives enabled us to highlight intra-organizational dynamics and obstacles to the application of impartiality, it meant less attention was paid to the broad environmental factors such as donor non-impartiality or difficulties of coordination remain to be further analyzed. The project also did not allow for practical testing of the tools proposed in the operational environment of aid delivery. The research team nevertheless believes that its work presents a useful first step towards supporting organizations in the application of the humanitarian principles. The potential of the start-up-like mindset in HQAI offers an exciting field for the imagination of how this initial work could be utilized in the future.

"Our biggest challenge is that when we discuss the standards, we sit in comfortable environments like Geneva. We calmly and intellectually discuss the principles. When we get to the field, we haven’t really slept for two weeks, we get 200 emails a day, but we don’t have electricity and our phone is about to go off, maybe a colleague has been shot at, [...] a lot of what we have come up with in another setting becomes invalid." (KI4, 8.11.2017)

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2 These include the CHS Guiding Notes, the CHS Verification Framework, the HQAI Audit tool and HQAI reports from past audits against the CHS.

3 More information on the materials developed can be found in Annexes IV and V.
Structure of the report
Section 1 below outlines the origins of the humanitarian principles, focusing specifically on elements of humanitarian action in which the principle of impartiality is most reflected. Section 2 discusses the common challenges that organizations face in attempting to deliver aid impartially. Section 3 proposes a model of operationalizing the principle throughout an organization, focusing on policies, processes, and organizational culture. Section 4 examines the extent to which the Core Humanitarian Standard captures the principle of impartiality, and section 5 then provides recommendations for HQAI’s audit practice, as well as a broader vision for donors and collective coordination mechanisms. The report is completed by a set of Annexes, which detail the theoretical and methodological approaches used (Annex I), sources of data (Annex II), and the complete impartiality mapping of the CHS standard (Annex III). Annex IV contains tools intended for the use by HQAI during Audit training and audit processes.4

4 These tools are not included in the public version of this report.

Photo: ODI 2016
Organization: Groups of individuals bound together by a common purpose to achieve certain objectives with special institutions that involve criteria to establish their boundaries and to distinguish their members from nonmembers, principles of sovereignty concerning who is in charge, and chains of command delineating responsibilities within the structure.

Institutions: Socially embedded systems of rules in a society (rules of the game) or, more formally, the humanly devised constraints that shape human interaction.

Humanitarian action: encompasses a broad range of activities at all stages of emergency prevention, mitigation and response, not simply material assistance but all actions taken to protect and respect people in humanitarian crises.

Organizational culture: a pattern of shared basic assumptions that was learned by a group as it solved its problems of external adaptation and internal integration, that has worked well enough to be considered valid and, therefore, to be taught to new members as the correct way to perceive, think, and feel in relation to those problems.

Organizational identity: The social construction which give organizations distinctiveness, and allows them to create and legitimize itself. Its endurance and continuation regardless of changes in the organizational environment, give organizations particular profiles, and positions. Basic internal elements include: mission, vision, objective and values.

Humanitarian operation: practices to create the highest level of efficiency possible within an organization. It is concerned with converting materials and labor into goods or services as efficiently as possible to maximize the results of an organization.

Operational context (or environment): the political, social, legislative, economic, cultural and natural environmental factors that significantly affect the daily works and implementation of any cooperation. It consists of the entities, conditions, events, and factors within and outside the organization that influence choices and activities. It exposes the strengths and weaknesses of the organization. Factors that are frequently considered part of the internal environment include the employee behavior, the organization’s culture, mission statement, and leadership styles.
The humanitarian principles – *humanity, impartiality, neutrality, and independence* – are widely held as the foundation and framework to guide humanitarian action, and to contribute to the distinction of humanitarians from other actors. The principles are strongly associated with the origins of the Red Cross and Red Crescent Movement and were formally agreed upon as the movement’s fundamental principles in 1965. The humanitarian principles have also been reaffirmed by the UN General Assembly in 1991, and through the 1994 Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief. Furthermore, the principles have also served as a basis for sector standards, including the Sphere Project Humanitarian Charter and Minimum Standards in Humanitarian Response, as well as the Core Humanitarian Standard.

The principle of impartiality states that humanitarian response should be prioritized on the basis of people’s needs, and not on the basis of people’s identities. The United Nations Office for the Coordination of Humanitarian Affairs (OCHA) defines the principle in the following terms:

> “Humanitarian action must be carried out on the basis of need alone, giving priority to the most urgent cases of distress and making no distinctions on the basis of nationality, race, gender, religious belief, class or political opinions.”

The principle consists of two sub-principles: proportionality, and non-discrimination. Proportionality necessitates the prioritization of resources towards the “most urgent cases of distress”, inspired by the medical approach of triage. Proportionality entails relieving...
“the suffering of individuals in proportion to the degree of their suffering and to give priority according to the degree of urgency.” The principle of non-discrimination draws from the principle of humanity, seeing that no identity marker other than humanity itself may affect the giving of assistance. Through these two sub-principles, impartiality acts as both an embodiment of values – universality and non-discrimination – and a source of operational guidance – through objectivity and needs-based prioritization.

Levels

The principle of impartiality acts as a driver for humanitarian action from the ground up to the global level. On the field level the impartiality of the organization as well as of the individual aid worker is relevant. For example, acts of discrimination can occur both if an organization withholds assistance to a particular group, and if an individual aid worker decides to prioritize assisting a friend over a stranger. Importantly, the principle of impartiality draws attention to the levels above the immediate field situation. Impartiality calls for strategic decisions, focusing on whole national populations and deciding where to work and which groups to give particular attention to. This places scrutiny on the “degree to which an organization’s program strategy aims to address those people most in need” Finally, impartiality draws attention to the need – and significant challenge – to allocate resources in proportion to global, humanitarian needs

In relation to the levels mentioned, acknowledging that impartiality carries a strategic significance leads to “evidence

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11 Pictet. (1979), 27.
[becoming] a very important part of the ethical practice."16 Along these lines, Pictet highlights the integration of the ethical and evidence-focused dimensions of impartiality, applicable to the individual humanitarian worker as well as the organization at large: “Impartiality requires a precise, complete and objective examination of the problems facing us and an exact assessment of the values entailed. It calls for a sustained effort to “depersonalize” the charitable action – and will sometimes be the fruit of victory in a hard-fought struggle within oneself.”17

Impartiality and balancing the principles
This report focuses on the principle of impartiality and its operationalization. Certainly, however, the ability to pursue impartial humanitarian assistance relates closely to considerations of the humanitarian principles as a whole.

The principle of humanity is the animating force of humanitarian action, giving reason for the actions of an organisation with a ‘humanitarian identity’. Pictet calls this the essential principle. Together, humanity and impartiality act as the substantive principles, being central to inspiring to action and directing it towards those who most need it.. Derived from these principles are the operational principles of neutrality and independence.18 The function of these two principles is on a pragmatic level, as they are tools to enable a humanitarian organisation to operate in politically sensitive situations. They are able to be applied and bent according to context and sensitivities, in order to achieve what is set by the substantive principles: impartial humanitarian action.

In practice, particular situations may reveal tensions, and even “outright contradictions” between the principles.19 The principle of humanity, often referred to as the humanitarian imperative, may at times be perceived as incompatible with impartiality, for example.20 An emphasis on an ‘imperative’ can risk framing the principle as something that should not be subject to conditions.21 The manner in which the principle of humanity is pursued is dependent on difficult deliberations on how to apply the principles of neutrality and independence. In particular, the relationship and tension between the principles of impartiality and neutrality will be highlighted further in relation to challenges of operationalizing the principle of impartiality in Chapter 2.

“...The balance between the imperative to assist and the need to consider the rights of affected populations and longer-term implications speaks to the heart of the matter on the relationship between the principles and the hard choices that organizations have to make in order to preserve their humanitarian identity.”

(HERE-Geneva, 2017: 11)

17 Pictet. (1979), 32.
18 Pictet. (1979), 8.
**Impartiality in practice**

Realizing the principle of impartiality requires the gathering and analysis of evidence, and the decision-making that enable this evidence to drive an organization’s priorities and allocation of resources. Objective needs assessments are a prerequisite for impartial action.\(^{22}\) This enables the evidence base for ensuring that programmes can be designed on the basis of non-discrimination and proportionality. Furthermore, efforts to coordinate and collaborate with other actors has the potential to enable a wider understanding of needs, and how to prioritize one’s actions in relation to other actors. Needs assessments and coordination efforts act as foundations to enable organizational decision-making, on both field and strategic levels, through which impartial humanitarian action can be realized. Further elaboration on the challenges – external and internal – in realizing such action will be made in the following chapters (Chapters 2 & 3).

The next page presents a hypothetical model of impartiality in practice, showcasing the elements of a humanitarian operation, which an organization is expected to consider in the application of the principle. It is not a description of an actual humanitarian operation, nor does it assume any particular size or type of humanitarian intervention. The elements described in the model are intended to serve as a roadmap for visualizing the interconnectedness of more abstract systems (such as organizational values, or site selection) with practical tools which are already typically associated with provision of impartial assistance (for example needs-assessments, coordination with partners). The points highlighted in the model are discussed in detail in the remainder of this research report. The model, however, is useful as it allows us to visualize the entire set of elements under consideration at once.

Applying Impartiality

Referral of unmet needs

Non-discrimination
Assessment of population
disaggregated needs

Site selection
Need-based in areas without coverage
Needs assessment, esp. triangulated, localized

Information sharing
Partner coverage, and continuous coordination

Assessment of entire scope
Continuous monitoring and thematic, geographic scope

An organization in organizational culture

Values

Sector culture

Illustration: Sketch of impartiality in practice
Principles as goals, not standards

Humanitarians deliberately seek to work in the most complex realities of today, faced with a range of limitations and constraints, many of which are beyond their direct control. In complex emergencies, prioritizing beneficiaries based on need might be near impossible. We ought to collectively move away from assuming that the principles are being delivered at all times, and admit that their application is a challenging task. This chapter aims at introducing the humanitarian principles as goals in humanitarian action, rather than already applied standards of aid delivery. The difficulty of principled action nevertheless doesn’t mean that the importance of the principles should be relativized, quite the contrary. Principles provide an essential, life-saving ethical framework, enabling humanitarians to navigate critical situations across the sector. As chapter 3 will elaborate, organizations can and ought to adapt processes and systems in their operations, which can support them in consistently systematically overcoming the challenges to impartial delivery outlined below:

“At times, certain level of compromise might be necessary in order to ensure aid can be delivered to those with most need, a junior field officer with the International Committee of the Red Cross explains. ‘An aid convoy wants to take a road that leads to the most affected place. There are places along the road that are also affected but on a lesser level. Looking to prioritize needs in line with the principle of impartiality, an organization might not have included those communities for delivery. There are military barracks, as well as civilians, who would see 15 trucks with aid pass by. The organization needs to ensure unhindered access to the most affected areas. It would be very risky to not include the less affected communities and say ‘well, you are hungry but the people over there are hungrier.’” (KI2, 18.11.2017)
Beyond the local level

While most commonly recalled in the narrow context of localized aid delivery, impartiality is frequently at risk in other layers of the humanitarian process, including at the highest levels of decision-making. In seeking to observe an organization’s application of impartiality, we ask the following: within a humanitarian actor’s scope of work (mission, vision, and objectives), are decisions and the allocation of resources aligned with observed needs? How do small organizations decide whether to assist beneficiaries inside a camp, or outside of it? How do large, international NGOs choose which of the many global crises demand their presence? What systems of information gathering and coordination do organizations participate in in order to ensure collective coverage of the largest needs across geographies?

Impartiality is reflected across a spectrum of decision-making and information-gathering processes beyond the field operation, not all of which are intuitively evaluated as relevant to the principle. If an organization strives to deliver humanitarian assistance in line with the principle, however, also these secondary areas need to be subjected to the application of non-discrimination and needs-based allocation of resources. The application of impartiality thus calls for a frequent (re)evaluation of the balance between needs and assistance at higher levels of the aid chain.

Besides the general need for considering impartiality at higher levels of organizational management, aspects of management complicate principled assistance. Project cycles, funding modalities, considerations for safety of staff and other priorities seem to complicate the straightforward application of the principle of impartiality.

“Are organizations pushing themselves to follow the humanitarian principles? So many organizations fall victim to the view that implementation of an existing project triumphs all other considerations. That is what some managers care about. Each organization should ask themselves how they make sure that there are people who ask question about the continued relevance of an intervention, and whether enough is done to identify evolving and new priorities.”

(KI7, 15.11.2017)

Particular challenges to impartiality

Application of the impartiality principle brings up a number of practical tensions in relation to security and risk management, coordination, as well as financing and donor influence. Humanitarian agencies increasingly outsource their response to local implementers and to manage response remotely in situations of armed conflict. When “do no harm” is replaced by “take no risk”, impartiality can be jeopardized, as organizations diminish their ability to collect reliable information on the real needs of populations.23

Humanitarian action based on needs inevitably prompts organizations to focus on coordination, which, however, presents a plethora of additional obstacles. Finally, funding and donor influence also have an effect on the ability to implement needs-based provision of humanitarian aid. These issues are further discussed below:

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The politics of need
An impartial assistance ought to be based on an assessment of needs of the population of interest to an organization (as defined through mission and vision). The needs-assessment is a well-established method through which organizations gather information on needs of communities affected by crisis. The ideal needs-assessment process would overcome information gaps through multi-sectoral coordination, and broaden geospatial understanding of needs. It is difficult to conduct needs assessment in volatile, complex emergency settings, however. Organizations lacking information often resort to partial assessments, or focus on areas of need predetermined by ease of access or other means, making prioritization of those ‘most in need’ a challenging task, if not one based on guesses or convenience.24 While the amount of relevant, essential information contained in assessment reports increased considerably over the years, to this day25, few disaggregate data across sectors of need, or spatially. Majority of other needs assessment tools are single sector or thematic in focus26.

Additional challenges in coordinated needs assessments stem directly from political considerations. Since ability to negotiate assistance for affected populations is frequently attributed to local leaders, organizations need to navigate political incentives for data manipulation in determining where needs are most severe. This issue is further exacerbated through the potentially problematic institutional connections between the UN, organizing some of the largest collaborative needs assessments, and the priorities of national governments.

“We don’t sufficiently capitalize on the tremendous amount of data that exists across programmes and projects. The data is often there but it can be very agency based, and we don’t always have mechanisms in place through which we can overlay data. Sometimes a cluster has it. But what matters is to have the mechanisms in place to be able to build up a real heat map to show what areas are in the highest need, and you can only do that by datasets. The information is largely there. But does this lead to a solid integrated picture? That’s the question.”
(KI7, 15.11.2017)

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Coordination

Over the past decade, the humanitarian sector has shifted from static product distribution towards a dynamic, networked system of many moving parts. In other words, it has transformed itself from a “spider” to a “starfish”. This transformation has brought innovation and flexibility of assistance, but also placed enormous coordination pressures on each of the participating actors wishing for a principled outcome.

The existing humanitarian architecture offers cluster coordination as a tool towards synchronization of the whole. The system, however, struggles to maintain independence in conflict settings, and by extension also impartiality. With similar consequence, needs assessments and response frameworks tend to be sectoral and thematic, making identification of general needs in a crisis difficult. On the other hand, the cluster system might present a good ally to lobby with relevant stakeholders for organizations wishing to push against the constraints they face in attempting impartial delivery (e.g. access).

The cluster system overall lacks explicit focus on impartial assistance, however, missing an opportunity to understand and coordinate the effects created at the collective level towards greater coverage of needs. Impartiality is particularly difficult to ensure when humanitarians operate across borders or frontlines, often unable to coordinate or even exchange information across the barrier.

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29 IIED 2016
Risk aversion

Humanitarian organizations were made to operate in environments of insecurity, yet, a disturbing pattern of risk-aversion emerges upon examining provision of assistance in violent emergencies. A recent study by SAVE\textsuperscript{30} indicates that humanitarian organizations are less likely to respond in conflict-driven emergencies, regardless of available funding or needs of local populations. As a result, insecurity, rather than need might determine coverage within high-risk regions, breaching the principle of impartiality. This is despite the fact that overall, aid work is not becoming more dangerous. Indeed, the perception of rising danger has been driven by small number of extreme attacks on humanitarian workers in Afghanistan, Somalia, Syria, and Sudan, while over all levels of danger remain constant or in decrease.\textsuperscript{31}

The MSF have critiqued the “bunkerization” of aid agencies\textsuperscript{32}, advocating for cautious reform of what they perceive as a harmful security culture. Creating safety for aid provisions, MSF advocates, would better be achieved through increased, rather than decreased contact with local environments. Such approach would also allow for increased flow of information regarding local needs through strengthened relationships with local leaders who might also be able to guarantee safe access. In a follow up to the pioneering 2011 OCHA study Stay and Deliver, a 2016 report notes that little has changed at the field level, however: few organizations are physically present in the most insecure regions, while too much attention is paid to neighboring, but relatively safe areas\textsuperscript{33}. The abundance of humanitarian attention to the Kurdish Region of Iraq vis-à-vis the other Iraqi provinces can serve as a perfect example of compromised impartiality\textsuperscript{34}.

Not reaching an isolated part of the population does not automatically mean that an organization is not impartial, it may just mean that what they were attempting to do failed\textsuperscript{35}. An increasingly popular strategy of remote management entails the sub-contracting of third partners, and necessitates the verification of their commitment to impartiality as well as other humanitarian principles. While not ideal, the increased prevalence of this approach shows that organizations do attempt to deliver aid based on their

\textsuperscript{33} Jackson, A., Zyck, S.A. (2016), Presence and Proximity: To stay and deliver, five years on, Norwegian Refugee Council.
\textsuperscript{34} Schenkenberg, E., Wendt, K. (2017), Principled humanitarian assistance of ECHO partners in Iraq, HERE-Geneva
\textsuperscript{35} KII, 2.11.2017
recognition of need even in less secure environments where they do not wish to operate. In examining the willingness of organizations to look for need in insecure regions, however, the researchers encountered accounts of organizational resistance to even begin gathering information on need in areas that are deemed “hard to reach” or “insecure”.

“Some organizations say, ‘don’t expect us on the frontline, our goal is to be in the second line, to serve the camps.’ That I appreciate, because at least they are clear. I want to push the envelope a little bit, but at least they are clear. The ones who want to do it, and are somehow not able to because of impeding factors, need to do something about those factors.

I at least expect an organization to be active in this regard.

Senior leader in UN Office for Coordination of Humanitarian Affairs
Humanitarian funding

The extent to which organizations are able to implement impartial assistance is also largely determined by the modalities and availability of donor funding in the humanitarian “market”\(^\text{36}\). A 2012 review of trends in humanitarian funding by NRC highlighted prevailing inequalities in the allocation of funding across global crises, however, as well as a clear preference towards funding high-profile, “fashionable” sectors or activities over protracted crises with low visibility, regardless of need\(^\text{37}\). The utilization of geographic, thematic, or political criteria is partly explained by the lack of a universal measure of humanitarian need\(^\text{38}\). The humanitarian market seems to indeed be run based on demand (by donor preference) and supply (assistance provision). While needs assessments should correct for these market imperfections, in practice they are not entirely able shift the attention of organizations back to allocating assistance according to needs.

Beyond global patterns, organizations’ dependency on donor’s funding schemes at times creates practical obstacles to the application of impartiality. Funding frequently arrives alongside short project time-frames, administratively demanding reporting obligations, and with limited flexibility of funding to satisfy changing needs. More importantly, however, especially for smaller organizations, funding seems to create a reverse dynamic in which funding availability determines which needs will be addressed rather than the opposite (see figure below). This effect is further strengthened through earmarked funding, which limits the ability of organizations to redirect assistance to populations outside the funding contracts. Such financial dependence presents an issue especially for smaller, donor-dependent actors. Some organizations, such as ICRC, must be commended for actively seeking to guarantee flexibility to their programming, diversifying their funding, or through advocating for more flexibility in funding modalities. Smaller, field delivery-oriented, and financially insecure actors, however, are not always able to oppose the influence of their donors.

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We need both upward and downward accountability.

(KI4, 8.11.2017)

“Funding can absolutely dictate some institutional choices regarding which crises the organization will focus on. Although the ICRC has an emergency reserve, which enables us to go to an area even if it wasn’t planned for in the annual budget, it remains an advocate of un-earmarked funding, as this allows relief to truly be channeled based on principled considerations, according to the urgency of humanitarian needs. We would accept earmarked funding at the country level, but if there is a focus on specific program from a donor, we would partially fight this. We have policy to ensure that the redlines are clear, and leave us with a degree of flexibility.”

(Senior expert on humanitarian principles, International Committee of the Red Cross)

“The biggest problem was in the way that funding was pushed onto partners. It was a hectic process, which gave organizations only very little time to come up with sensible requests. Because there was a preparedness fund, partners said, ‘let’s do something on preparedness’. How the funding allocation process was managed probably really lowered the quality of the response.” (KI2, 18.11.2017)
Operationalizing impartiality

The humanitarian principles are the cornerstone of the humanitarian action. Since the principled approach is what makes an operation humanitarian, the humanitarian principles should be reflected in the decision-making processes that permeate the organization at all different levels in all working units. Specifically, the principle of impartiality is reflected in the delivered aid which should observe the criteria of non-discrimination and proportionality, prioritizing the most urgent cases. Nonetheless, before the data are analyzed and decisions taken, it is necessary to ensure that all the cases of the targeted population are indeed included in the needs assessment analysis, begging from the global level (region selection) in case of international organizations to specific level (field operations). Thus, information gathering and coverage are central to guaranteeing impartiality in the delivery of aid.

It is clearly understood that major differences exist among humanitarian organizations, especially between UN agencies, large NGO’s, and the anchors, about their operational styles and mandates. Without forgetting these differences, still, the current analysis draws attention to their commonalities and shows that the source of impartial assistance comes from very similar organizational dynamics. In sum, from the perspective of organizational behavior there may be more similarities than conventional understanding suggests. Systems, process and policies more than the organizational structure serve as a mechanism to produce, reproduce and perpetuate the organizational culture: understanding of what impartiality means, what it looks like, and how to achieve it.
Organizations and their environments are correlatively dependent and interrelated. Rather than isolated and encapsulated entities, modern organization theorists perceive organizations as social sub-systems performing in a broader system, blending and adapting according to the environment in which they perform.

Given the fluid and dynamic nature in which humanitarian organizations perform, and considering the divergent conceptualizations and operationalization of the principle of impartiality, modern organization approaches help us to disentangle impartially from theory to practice. And thus, to map the processes and systems that humanitarian operations should include to be impartial. Specifically, systems theory, socio-technical approach and a contingency theory allow us to carry out an in-depth analysis of an organization at multiple levels from several dimensions. Nine areas of focus are proposed below to isolate and examine the extent to which organizations are operationally impartial:

Organizations committed to impartial assistance should have in place the systems, policies and processes aiming at including as many members of the target population as possible, extending the organization’s geospatial outreach for information gathering and reducing the possibility of overlooking members. Organizations gather information based on the target population they seek to reach, which is determined by: a) the organizational goal (mission, vision, values and objectives) and b) the services that each organization provides (is capable to provide). The organizational goal (OG) gives identity to the organization and responds to the fundamental questions of what to deliver, when, where, why, and to whom. In this way, the OG governs; a) the strategies, b) the services offered, c) the organization systems, structures, and processes, and d) the operational context (selection and infiltration methods). In the humanitarian sector, regardless the divergence in mandates and location, organizations converge in the goal of alleviating human suffering.

1. The humanitarian principles should be included along with the organizational values, reflected in the overall organizational goal (mission, vision, objectives) and the strategies.

   - The alignment of the organization goal with the humanitarian principles, strategies and structures
   - The alignment of the organizational goal with the systems and process, particularly those related with the information and communication flows

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Making sense of data
Organizations committed to impartial operations and delivery seek constantly to reach all the people of the target population through systems aiming at amplifying the coverage; working out operational mechanisms to collect, manage, interpret, communicate and refer data. In that vein, regardless of the organizational structure used, organizations should contain a unit with the capacity to integrate data and make sense of it (operational intelligence, OIU). The OIU should be responsible for not only setting the search parameters, gathering, analyzing and reporting, but also for constructing a framework which integrates the data for the decision-making process. By identifying the needs and matching them with the organizational goal and services, the OIU sets the scenario for actions to be taken at the organizational level.

“If you leave these things too much to IMOs (information management officers) you are not going to get there. If you only leave it to generalists you’re also not going to get there. You need to have the data, but also people who can interpret the data, and say what this means.” (KI7, 15.11. 2017)

The existence of working units in charge of operational intelligence to information management, data interpretation and integration

- Capacity control; data collection, interpretation and incorporation into an integrated framework to take decisions
- The Interpretation of the combined data follows the organizational goals
Flexibility in operations
The context-based nature of the humanitarian operations requires information collection to be dynamic, timely and coordinated from and within internal and external sources. This level of dynamism and fluidity of the operating environment requires the organizational structure to be highly decentralized, with self-management principles. Nonetheless most organizations keep hierarchical structures and high levels of bureaucracy. Both could compromise the timeliness of response.  

Humanitarian organizations do not perform alone (should not). In the humanitarian space, the sector operates along with other two sectors; the private sector and government sector and their dynamics shape the nature of the aid provision. Thus, the organizational connectedness and network should be decentralized, 41 regional but global, and holistic rather than restricted. Namely, with complex operational environment with adaptive schemes, and many agents acting in parallel, the network organization 42 should include inter-organizational linkages and procedures to receive, process and transfer information from all actors -government, NGOS’, beneficiaries, civil society and private organizations.  

3 Regional units (teams) of the organization have independency in their daily operations, acting and performing as sub-organizations with functional areas across regions for localized strategies.

- Self-manage teams aligned their strategies with the overall organizational goal
- Fluid communication among units with contextual leadership within the teams (working units)

4 The organizational goal and general strategies should be communicated at all levels and in a cross sectional manner, to ensure that, regardless the context, the decisions made by any unit keep the organizational identity

- Alignment and shared understanding of values, polices and systems across working units (within and outside of the HQ)

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Modelling an organization in the humanitarian space
Principled policies and processes
To examine the level of impartiality as organizational behavior, it is important to look at two areas: the organizational goal and the administration of the strategy at all stages: preparation, organization and conduct of the matching between services the actor is able to offer and the target populations’ need. The strategy is implemented through policies, systems and processes. In this capacity, the organizational effort to deliver impartial assistance should be reflected in the policies and process that shape the flows of information and communication inside and outside the organization.

Policies and processes aiming to amplify the geospatial coverage and capacity while meeting the organizational goal:

- Policies and procedures to receive and process requests (from different sources; stakeholders, civil society, etc.)
- Policies for information management (collection, analysis, report, dismissal and transfer)
- Policies for internal and external communication
- Policies for referral requests

“If you want to be ‘there’ and ought to be ‘there’, you have an obligation to say what impedes your ability to go ‘there’ and work tirelessly to address access impediments.”
(KI7, 15.11. 2017)

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Proving its value; requests and referrals
In the humanitarian sector, information from any source is relevant given the fluidity of the operating environment and the capacity reduction to submit a request for assistance that a population in need could experience. The context fluidity and capacity reduction create a gap between those who experience the situation but lack the means to present a request, those who have the means to fulfill a need but ignore the situation and those who know the situation, and have the means to submit a request but lack of the legitimacy to be heard. Most organizations remain unaware of this gap limiting the response to an unknown, sudden, or forgotten crisis. To guarantee a greater coverage and enlarge the sphere of action, two mechanisms should be in place for processing requests; the pull (bottom-up perspective) and push (top-down) systems. However, among humanitarian organizations the push (top down) approach is predominant. The starting point for an operational action comes from the top level which are project lines with limited number of requests.

Humanitarian organizations with pull and push systems can therefore a) increase the coverage, b) strengthen their capacity, c) provide mechanisms for referrals and d) integrate systems in charge of information management, knowledge production and communication.

Push and Pulls systems aiming to amplify the geospatial coverage and strength organizational capacity

- Policies and procedures to receive and process requests (from different sources; stakeholders, civil society, etc.)
- Systems and processes of information management (collection, processing, dismiss and referral) aiming at receive information from top-down flows
- Systems and processes of information management (collection, processing, dismiss and referral) aiming at receive information from bottom-up flows
- Bidirectional communication processes for directing internal and external communication flows.

“In the case that we have many requests, impartiality really proves its value” (KI2, 18.11. 2017).

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45 Tumwine, Kutyabami, Odoi, & Kalyango, 2010, Grabban, 2012

Organizational culture

Organizations produce institutions which are not only constituted by formal organizational arrangements, but also by norms, symbolic systems, basic assumptions, and moral archetypes which provide a meaning system that guides their action\(^\text{47}\). These forces better known as organizational culture affect the behavior of actors in organizations and their primary preferences to cooperate and work with other actors. As an encoded guide, the organizational culture provides structure and meaning to the group's members, to guide their actions.

The organizational culture is created, adapted and reproduced in the operating environment. Specifically, the operating environment is molded by two dynamic forces; a centripetal and a centrifugal, from inside the organizations to outside and vice versa. The centrifugal force relates to formal rules (code of conduct, systems, policies and processes)\(^\text{48}\) which help to direct the decision-making process, but, they become unconscious only when they are internalizing through repetition consistency and the application of social sanctions\(^\text{49}\). Specifically, three mechanisms determine the ability of an organization to align their values with policy, processes, and action:

\begin{itemize}
  \item the level of training in the organizational goal,
  \item the operating system design and processes,
  \item the internationalization of formal rules in a consistent and fluid manner\(^\text{50}\).
\end{itemize}

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\(^{48}\) Schein, Edgar H. "Coming to a New Awareness or Organizational Culture." Sloan Management Review, 1984: 3-16.


When the formal rules are applied in a regular, consistent and repetitive manner, not only it encodes unconscious behavior but also gives a sense of security and identity which creates attraction; rather than acquiring behaviors we are acquired by them (Shove 2012).

**Enabling dissent**
When looking at how the formal rules are applied and understood across the sector, we encounter differences among organizations and UN agencies creating a lack of consistency in practice. And when analyzing the belief system; dynamics and behaviors related to impartiality on decision making processes and organizational operations, six interconnecting key assumptions are evident:

- **Embedded humanitarianism:**
  Organizations and their staff do not become humanitarian, they have it embedded in their value system since beginning of times.

- **Moral dilemma:**
  Humanitarian organizations save peoples’ lives, all the operation are directed to help people. So, wherever the operations are taken place humanitarian are in the right place.

- **Family identity:**
  A shared understanding exists; “we all know who we are”

- **Truth to experience:**
  The experience is ultimately the legitimate source of knowledge on applying the humanitarian principles.

- **Humanitarian enclaves:**
  a humanitarian operation is one carried out by humanitarian organizations.

These six elements with the inconsistency in applying the formal rules create a system which reinforces the tendencies to not doubt the actions of one’s organization in the humanitarian sphere. These assumptions also affect the understanding of impartiality. In doing so, they prevent the re-evaluation of operations not aligned with the organizational goal. These assumptions also affect attitudes, and performance in respect to:

- The politics and logistics for coordination and communication among the different working units at different levels
- Responses to perceptions and expectations (relation with the Government, other NGO’s, organizations from private sector and UN agencies)
- Communication and operation with different actors, beneficiaries, target populations, and civil society

“We while all organizations I have worked for have some sort of policy reiterating the importance of humanitarian principles, in practice I feel like I play the role of the organizations’ ‘bad conscience’ when it comes down to real decision-making. It is quite lonely to argue against accepting funds, for instance [when this goes against the principles]”

*Macdonald and Valenza, 2012:12*

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51 The analysis of the artifacts in level 1 and 2 is not described in the final report however, it is portrayed in the annexes with Schein’s organizational culture theory
Three additional points of observation should therefore be made in the pursuit of analyzing an organization’s operational application of impartiality:

"Knowing that the principles are applied consistently is helpful for me because it enables me to say no"... "Because people have the perception that we apply this consistently, it is accepted. People understand it and think it makes sense. And the principles enforce each other..."

(KI2 18.11 2017)"

**Organization’s formal rules (code of conduct, systems, policies and processes) are implemented in a consistent and fluid manner;**

- Constant training (theoretical and operational) on the organizational goal (mission, vision, objectives, values, code of conduct and humanitarian principles)
- Operational training in the organizations systems, processes and policies, specifically those related to information and communication flows
- Consistency of the formal organizational rules

**The meaning systems reflect humanitarian principles, solidarity, equity, equality in power-relations, and cooperation with other non-traditional actors (private sector, society, non-profit sector) within the organizational goal.**

- The politics and logistics for coordination and communication among the different working units at different levels (inside the organization)
- The politics and logistics for coordination and communication among the different actors outside the organization (private sector, society, non-profit sector)
- The politics and logistics for not coordinating and communicating with specific actors.

**The meaning system reflects alignment with the humanitarian principles, organizational values, roles and feasibility**

- Responses to perceptions and expectations within the organization
- Responses to perceptions and expectations among humanitarian organizations
- Responses to expectations and perceptions with other actors
“Sometimes one person, or a small collective, observes that there may be something that is not ok with the way we operate. Something that we can do better. Each organization should ask themselves how make sure that there are people who ask questions. “Should we not be here?"

Sometimes you need to rock the boat somehow, with your colleagues, the system, parties to the conflict. Are you willing to temporarily get out of your comfort zone? ...you need to ask “Is this still as relevant, as ahead of the curve as it should be?”

(Senior leader in UN Office for Coordination of Humanitarian Affairs)
The Core Humanitarian Standard on Quality and Accountability (CHS) was launched in 2014, in order to facilitate more efficient and effective action by the entire humanitarian community. As a voluntary and measurable standard, the CHS describes the essential elements of principled, accountable and quality humanitarian action. The CHS brings together central elements of already existing standards, including the 1994 Code of Conduct, the 2010 HAP Standard in Accountability and Quality Management, the Sphere Handbook Core Standard, and the Humanitarian Charter, and the Quality COMPAS. Consisting of nine commitments, the CHS consists of nine commitments which outline what beneficiaries can expect from organizations delivering assistance. Each of these commitments is supported by a set of requirements detailing how organizations should be working to ensure that the commitment is met. To allow an organization to measure the extent to which they are aligned with the standard, the CHS Alliance have set up CHS Verification Scheme. Organizations are able to use four different options of verification; self-assessment, peer review, independent verification, and certification. The latter two option are carried out by HQAI, in the capacity of being an auditing body independent of CHS Alliance and the standard setting process.

The Core Humanitarian Standard sets out to “describe the essential elements of principled, accountable and high-quality humanitarian action.” The four principles are stated as integrated into the standard through its commitments, quality criteria, and requirements. This claim is, however, not fully specified or evidenced in the Core Humanitarian Standard document. This chapter will identify to what extent the CHS captures the principle of impartiality, and the related gaps that exist in the standard.

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52 CHS Alliance, et al. (2014), 4-5.
55 CHS Alliance et al. (2014), 2.
Discussions during a learning event organized by HQAI in June 2017 resulted in the recommendation to make explicit the requirements that relate to the principle of impartiality. The recommendation was also made that the maximum capacity of existing frameworks should be used in any effort to measure impartiality. Furthermore, the need for the promotion of a consistent interpretation of the standard was highlighted. Informed by these recommendations, the CHS is analyzed in the light of its guiding documents and the guiding questions contained by the audit tool used by HQAI during their audit process against the CHS.

With this analysis, the elements of the impartiality principle are identified in relation to all of these guiding documents. This has the objective of enabling the fullest use of and consistency among the guiding documents in the identification of the principle of impartiality in the standard.

**Impartiality in the CHS**

As the humanitarian principles are integrated into the standard, they are not limited to one or a few single commitments, or requirements under these commitments. Based on a comprehensive analysis, the principle of impartiality has been identified in six of the nine commitments, with a concentration on commitments 1, 2 and 6.

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56 The term “requirements” is used to refer to the “Key Actions” and “Organizational Responsibilities” outlined in the CHS.


59 The full mapping and analysis of the CHS can be found in Annex III.
Under the six commitments, 20 requirements are identified as relevant to impartiality. The CHS covers several central aspects of the principle of impartiality.

The most central strengths of the CHS are its, a) emphasis on allocating programme resources based on identified needs, b) insisting on that needs are for a policy commitment to impartiality and, d) calling for unmet needs to be referred to other organizations through coordination. The discussion below outlines in further detail where central aspects of impartiality are found in the CHS and gaps connected to these comprehensively assessed and vulnerabilities are taken into account in programme design, c) explicit requirement

Impartiality and assessing needs
Requirement 1.2 is the most central requirement with regards to impartiality in assessing needs. It necessitates that programmes are designed based on an impartial assessment of needs and risks, including an understanding of vulnerabilities of different groups. The Guidance Notes articulate that “special efforts are needed to assess needs of people in hard-to-reach locations.” This draws attention to the need for collecting assessment data which may increase the likelihood of identifying those most in need, and ensuring that vulnerable groups are included in the data. The requirement also emphasizes that programme budgets and resources are matched with needs, which is reflected in guiding documents.

Requirement 3.3 and 4.3 both act to ensure that avenues for receiving information on needs are open and accessible, and that vulnerable and marginalized groups are able to have their requests and inputs heard. Requirement 3.3 focuses on the need to support the development of local organizations and representation by marginalized and disadvantaged groups within them. This can help utilize the inherent knowledge that local organizations have in identifying the needs of specific groups, which can contribute to a more non-discriminatory and needs-based response. Furthermore, requirement 4.3 serves to ensure that people and communities are represented and participate in all stages of the work. The focus of the requirement is on how inclusivity can ensure more appropriate programme design and implementation. However, it currently does not explicitly relate to the need for and potential benefits of ensuring that avenues exist for vulnerable or isolated groups to directly contribute to a wider, more comprehensive assessment of needs. Members of such groups can contribute with information and assistance requests which may complement an organization’s prior assessment of needs.

A prerequisite for basing programmes on needs is the existence of a “systematic, objective, and ongoing analysis of the context and stakeholders”, as stated in requirement 1.1. The role of this requirement is further discussed in relation to coordination below.

Policy commitment to impartiality
Requirement 1.4 is the key requirement for identifying the nature of an organization’s policy commitment to impartiality. The requirement explicitly addresses the principle. A policy commitment should be articulated, supported through processes and systems, understood by staff, and effectively communicated to relevant stakeholders.

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60 CHS Alliance (2016), 1.2. HQAI (2017), 1.2.
61 CHS Alliance et al. (2015), 3.3.
62 “Policies commit to providing impartial assistance based on the needs and capacities of communities and people affected by crisis” (CHS Alliance et al, 2014: 1.4).
stakeholders. Guiding documents ask whether relevant stakeholders perceive the organization as impartial and non-discriminatory. While 1.4 serves as a primary requirement covering the policy commitment dimension of impartiality, requirements 1.5 and 6.6 are also relevant. Requirement 1.5 addresses the policy dimension of ensuring non-discrimination, requiring a commitment to take into account “disadvantaged and marginalized people, and to collect disaggregated data.” Requirement 6.6 addresses the need for clear and consistent partnership agreements. A guiding question in the audit tool asks whether agreements include considerations of “how each partner will contribute to jointly meeting the humanitarian principles.” The CHS does not, however, explicitly necessitate that a policy commitment to impartiality includes a position on how an organization’s inherent constraints (including thematic focus and funding policies) relate to its application of the principle of impartiality.

Impartiality in resource allocation
The proportionality sub-principle of impartiality necessitates that resources are allocated in proportion to needs. This is covered most centrally in requirement 1.2, where guiding questions ask how programme budgets and resources are matched with, or allocated in proportion to identified needs. The Guidance Notes for requirement 1.6 emphasize that “budgets and resources should be allocated according to need.” Focusing on adaptability, requirement 1.3 requires the ability to adapt to changing needs. Requirements 2.5 and 2.7 necessitate that monitoring and evaluation is used to adapt programmes, aiming to address imbalances in reaching, for example, vulnerable groups. Through the requirements mentioned, it is evident that the CHS places a considerable emphasis on the necessity for needs to be the primary factor in designing programmes and allocating resources. This places an emphasis on organizations to provide evidence in regard to how this is carried out in practice.

Both of the sources providing guiding questions include a question on proportionate resource allocation under requirement 1.2. In line with the CHS Alliance Verification Framework, the HQAI audit tool asks, “Are [program] budgets and resources allocated in proportion to identified needs?” Explicit connections between identified needs and the way in which resources are allocated are, however, largely not found in HQAI audit reports under this requirement. Of the seven audit reports analyzed, one explicitly referenced this connection. The report stated that “[program] budgets (including un-earmarked funds) were allocated based on needs and organizational capacity to deliver.” The lack of utilization of this guiding question in the audit process compromises the emphasis placed on the need for a needs-based justification of resources allocation, which is highly evident in the guiding documents of the standard.

Impartiality in coordination
Commitment 6 requires organizations to contribute to coordinated and complementary response. One overarching question guiding the commitment is “Are gaps in coverage identified and addressed?” Addressing information gaps as well as gaps in assistance coverage is central to

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63 CHS Alliance et al. (2015), 1.4.
64 HQAI (2017), 1.4.
66 HQAI (2017), 1.2.
prioritizing providing assistance to those most in need. Requirement 2.3 is the core requirement highlighting to what extent an organization identifies gaps in its own assistance, and how it refers such gaps to other actors, ensuring that they get addressed. An organization has “a responsibility to refer [unmet] needs to appropriate organizations, and lobby for these needs to be met.”\(^{67}\) Furthermore, an organization is to ensure that its actions are complementary to those of other actors. Both requirements 1.1 and 6.1 focus on the necessity of a comprehensive analysis of the context and stakeholders. Requirement 6.1 necessitates that other actors and actions are identified, with 6.2 requiring that the organization acts to complement these actions.\(^{68}\)

According to requirement 6.3 an organization should coordinate and collaborate with others with the objective to “maximize the coverage and service provision of the wider humanitarian effort.”\(^{69}\) This highlights the necessity for the single organization to contribute to the ability of the wider response identify and prioritize those most in need. Importantly, requirement 6.5 highlights that there are policies and strategies to ensure that coordination and collaboration do not compromise humanitarian principles. This requirement thus requires evidence on how an organization relates to the humanitarian principles, including impartiality, in relation to its coordination efforts.

**Impartiality and staff support**

Ensuring that staff have an understanding of the humanitarian principles, and how to apply them, is central to enabling a consistent operationalization of the impartiality principle throughout an organization. This aspect of impartiality is partially covered in the CHS. Under requirement 1.4, the Audit Tool guiding questions ask whether clear policy commitments to impartial action are known to staff. This enables an auditor to probe into how staff are made aware of an organization’s policies on impartiality, and the humanitarian principles at large. Commitment 8 addresses the need for assistance to be carried out by competent and well-managed staff. Requirements 8.1 and 8.3 require staff to work according to the “mandate and values of the organization” and to “use the necessary personal, technical and management competencies to fulfil their role.”\(^{70}\) While the competency to effectively utilize the impartiality principle may possibly relate to the contents of these requirements, such a connection is currently not made in any guiding documents.

**Impartiality and addressing external constraints**

As illustrated in Chapter 2, a single organization is subject to constraints which provide obstacles to providing needs-based assistance. It is, however, possible to proactively address these constraints, with the objective of increasing coverage and reaching those most in need. This is addressed in the CHS to a degree. This is especially relevant with regards to funding constraints related to, for example earmarking. Under 1.3, the Guidance Notes state that “discussion may be needed to ensure that donors are in agreement with [adapting to changing needs].”\(^{71}\) Requirement 2.1 covers the aspect of addressing constraints, to ensure a safe and realistic response. The Guidance Notes state that “[diplomacy], lobbying and advocacy with government, other

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\(^{67}\) CHS Alliance et al. (2014), 2.3.

\(^{68}\) CHS Alliance et al. (2014), 1.1, 6.1, 6.2.

\(^{69}\) CHS Alliance et al. (2014) 6.3.

\(^{70}\) CHS Alliance et al. (2014), 8.1, 8.3.

\(^{71}\) CHS Alliance et al. (2015), 1.3.
organizations and donors may be required at a local, national or international level to overcome constraints.” It should be noted, however, that the emphasis of the requirement is on obstacles to timeliness, rather than to a wider assistance to reach those most in need. This poses a certain gap in the ability of the CHS to assess whether constraints are addressed, driven by the principle of impartiality.

Gaps in the CHS

GAP 1: Staff Support

As made evident in Chapter 3, staff training is an essential element in reinforcing the application of impartiality. This applies to staff on the field level who may face daily challenges in effectively communicating the principle externally, and engaging in discussions on impartiality internally. It also applies to staff working in managerial, communications, and strategic leadership capacities. Commitment 8, that staff and volunteers are to be competent and well-managed, is highly relevant to this end. However, there is currently not a specific requirement which clearly enables a discussion on how impartiality and the principles are promoted through Human Resources. Furthermore, Chapter 3 highlights the importance of, and mechanisms related to, enabling a culture where questioning decisions is acceptable and encouraged. Realizing such a culture may be especially challenging in relation to internal discussion regarding to what extent the principles are being pursued and realized in a certain situation, or in relation to a certain strategic decision. This is due to the risk of such a discussion challenging an underlying assumption within the organizational culture: the assumption that the organization is, by default, acting in a principled manner. While requirement 8.1 focuses on ensuring that, for example whistleblowing handling mechanisms are in place and that such staff action is supported, the question of supporting an organizational culture where dissent and discussion in relation to the humanitarian principles is possible and encouraged is not evident.

GAP 2: Comprehensively addressing constraints

Another central gap area concerns the issue of addressing constraints. As discussed in Chapter 3, a single organization is subject to many constraints that hinder fully needs-based humanitarian response. It is, however, important for an organization to consider how it can proactively pursue an application of the principle of impartiality based on its own capacities and constraints.

Firstly, the requirement to have a policy commitment to impartiality (1.4) does not currently take into account the necessity for an organization to explicitly consider how its organizational capacities and constraints relates to its policy on impartiality. Secondly, the requirement to address constraints (as articulated in 2.1), does not primarily regard an organization’s ability to target those most in need, but focuses on obstacles to timely assistance. Thirdly, the CHS does not cover the question of whether an organization effectively uses coordination mechanisms to lobby for constraints to be addressed. As discussed in Chapter 2, there may be instances where coordinating bodies have a stronger lobbying power than a single organization in efforts to, for example, gain access to an opposition-controlled area.

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72 CHS Alliance et al. (2015), 2.1.
GAP 3:
Global impartiality
While questions of impartiality in relation to needs and justified resource allocation are comprehensively integrated into the CHS, the standard lacks a focus on the question of global proportionality. A comprehensive approach to impartiality necessitates that resources be allocated in proportion to needs on a global level, not only within the confines of a specific country, or sub-region.\textsuperscript{73} The need for an organization to relate to the global, macro dimension of the principle impartiality is not necessarily left outside of the scope of the CHS. The aspect can be included in the requirement for a policy commitment to impartial assistance (1.4). However, the CHS is framed using a language that draws attention to the crisis level. In line with this, central requirements like 1.2, only requires a needs-based allocation of resources on the programme level.

\textsuperscript{73} As discussed in Chapter 1.
I. Training of auditors

Organizations and their operating environments are correlative dependent. The operating environment influences the decisions and actions of the organizations staff which in turn affect the organizational goal. Understanding an organization as a subsystem of the open social system, that evolves and adapts according to the operating environment in which it is situated will help auditors to understand how organizations work, the reasons for its operations and the decisions that organization takes. It will also help to find ways for mapping the formal structures within. Certifying organizations against a quality standard (such as the CHS) therefore requires seeing the organization as a system within a system, with its own identity, capacities, strengths and weaknesses, otherwise the certification process will fall into the danger of certifying projects, not organizations.

The decision making and organizational behavior should embrace a general perspective starting with the organizational identity; how the organization justifies its existence and the alignment of this justification with the organizational goal, the systems and strategies. Specifically, for decision making regarding impartiality, there is a need to differentiate between operation and delivery; while the delivery of the assistance might not cover the target population, the operation flows should aim to do so. That is to say within the organization boundaries (objectives, goals, services, and capacity) the organization develops and implements policies and systems: a) to localize the members of the target population, b) to meet the needs of the target population, c) to localize and prioritize the most urgent cases, c) to refer the cases that you localized but were unable to meet and d) keep track on the referral cases and c) to receive and transfer requests, coordinate with different actors from different sectors. Namely, the organization has the systems and culture which enable it to push against constraints (internal or external) and overcome obstacles to deliver fully impartial assistance. Thus, to evaluate the impartiality as a principle, the structures which operationalize it and the efforts to overcome constraints, we offer four specific recommendations:

1) Have an internal shared understanding of the humanitarian principles and their operability; training auditors in humanitarian principles (theory and ways to operationalize them) could serve as tools to help auditors to adapt the different organizational goals and the tailored systems within organizations.

2) Training auditors in modern organization theories to understand the organizational identity, the alignment with the organizational goal and dissemination of it as a mean to explore the organization justifications for its operations.
   → the alignment of the organizational goal (mission, vision, objectives and values) and strategies with the humanitarian principles
   → to examine the processes to disseminate the organizational goals and/or humanitarian principles in terms of methods and cycles such as trainings and workshops

3) Use visuals for mapping back the sequence of organizational actions and operations in order to have a snapshot view of the organizational operations and tools to verify them.
   → Frameworks to operationalize impartiality, described in previous sections of this report could help as a guide to trace back and map the flow of the diverse organizational operations in terms of coverage, legibility, roles and connection among actors and working units. They also allow examining the diversity of strategies that humanitarian organizations use to mediate and counteract the different constraints in the operating environment. In this sense, visuals could help to look for not what is it, but what it is not.

4) Involve auditors who come from outside the humanitarian sector to assess the organizational culture.
   → Given that the organizational culture involves dimensions taken for granted, and underlying assumptions, auditors from the humanitarian sector might fail to evaluate the common wisdom in an organization or in a sector.
II. Audit tool updates

The HQAI Audit tool is an essential instrument for auditors conducting management systems audit against the Core Humanitarian Standards in humanitarian organizations. The Excel-based tool is the essential evidence-gathering space, which guides HQAI investigators through the audit process. In pursuit of a more thorough investigation of organization’s operational impartiality throughout the CHS audit process, the research team proposes an addition of yet another small element to the Audit tool, which will be shared with the Humanitarian Quality Assurance Initiative as one of this research project deliverables.

Naturally, the operational elements strengthening organizations’ capacity for impartial action could easily create a stand-alone tool/index for an entirely separate verification or certification process. In the process of searching for the best-fitting solution to capturing organization’s practice on impartiality, however, it soon became apparent that the humanitarian community is not in need of yet another measurement tool. The Core Humanitarian Standard has been developed through a thorough collective effort, engaging stakeholders across the sector in a process that eventually guaranteed a widespread recognition of and respect for the standard. As the CHS standard is deliberately based on the four humanitarian principles, it is fitting to strengthen the extent to which these are examined in verification against it. The exploration of organization’s application of impartiality will therefore be most useful as a part of the audit process against the CHS standard. In the future, the remaining three principles could be operationalized and incorporated in a similar manner into the audit process.

The updates consist of a set of a dozen guiding questions incorporated into HQAI’s Audit tool. The questions do not seek information that would range beyond what the 9 Commitments of the CHS already aim to cover. They are merely intended to highlight aspects of individual CHS indicators and sub-indicators relating to impartiality in both policy and organizational practice, which has not been previously investigated through audits. As a whole, this addition strives to keep auditors aware of the connection between different aspects of organizational structure, practice, and policy which directly or indirectly determine the organizations’ ability to overcome external obstacles to the application of the humanitarian principle.

While experienced auditors do not rely on guiding questions from the Audit tool throughout the audit process, this addition is nevertheless useful. It will serve as an additional reminder to consider the impact of organizational practice on the ability to deliver impartial assistance when in the process of reviewing evidence gathered and determining organizations’ compliance with the CHS (and, indirectly, the humanitarian principles).

Table below lists the additional Guiding Questions recommended to HQAI. The next page features a simplified sketch of the Audit Tool in order to highlight the additions.

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76 Divided into sections in accordance to the standard, the tool also contains numerous other elements which are not to be discussed publically, but also are not relevant for our deliverable.
<table>
<thead>
<tr>
<th>CHS Requirement</th>
<th>Guiding questions (existing)</th>
<th>Proposed follow-up questions</th>
</tr>
</thead>
</table>
| 1.2 Design and implement appropriate programmes based on an impartial assessment of needs and risks, and an understanding of the vulnerabilities and capacities of different groups. | | → How is data collected and analyzed to inform programme design? *(How the organization collects and integrates data to make sense of it?)*  
→ How was the choice of project site made?  
→ Is a sustained presence re-assessed in the light of changing needs?  
→ Under what conditions does the organization leave a location to prioritize another? *(See also 1.3)* |
| 1.3 Adapt programmes to changing needs, capacities and context. | What actions are taken to adapt the response strategy based on changing needs, capacities, risks and the context? | → How does the organizational structure facilitate flexibility and adaptivity in decision-making? *(Do the regional working teams (units) govern themselves? Does the organizational structure facilitate flexibility?)*  
→ Do staff have the appropriate decision-making capabilities to ensure this? *(Who should coordinate with whom internally? Hierarchies, positions, who can coordinate with others, who can make decisions, ..)* |
| 1.4 Policies commit to providing impartial assistance based on the needs and capacities of communities and people affected by crisis. | Does the organization have a clear policy commitment to impartial and independent action? Is it known to staff? | → How do systems and processes reflect and support stated policy commitments to impartiality?  
→ Does policy reflect how the organization can deliver impartially within its objectives, scope, and constraints?  
→ Do policies consider impartiality in relation to global needs? *(Applicable to INGOs)* |
| 2.1 Design programmes that address constraints so that the proposed action is realistic and safe for communities. | | → Are funding and earmarking constraints addressed and brought to the attention of relevant donors? |
| 6.3 Participate in relevant coordination bodies and collaborate with others in order to minimize demands on communities and maximize the coverage and service provision of the wider humanitarian effort. | | → Does the organization effectively use coordination mechanisms to lobby for constraints (e.g. access) to be addressed? |
| 4.3 Ensure representation is inclusive, involving the participation and engagement of communities and people affected by crisis at all stages of the work. | Are crisis-affected people’s views, including those of the most vulnerable and marginalized, sought and used to guide programme design and implementation? | → How are requests from communities for assistance handled? How are approvals and dismissals of such requests justified? |
| 6.5 | Policies and strategies include a clear commitment to coordination and collaboration with others, including national and local authorities, without compromising humanitarian principles. | Does the commitment to coordination and collaboration appears in key strategy and communication documents? The commitments clearly state the underlying principles of coordination? | ➔ Do coordination policies and strategies take into account how coordination is to be carried out in accordance with the organization’s commitment to the humanitarian principles? Is the organization’s wider humanitarian identity considered in coordination strategies? ➔ Do communities and other organizations perceive the organization accordingly? |
| 8.1 | Staff work according to the mandate and values of the organization and to agreed objectives and performance standards. | How are the organization’s mandate and values communicated to new staff? How are the staff trained to work accordingly to the mandate and values of the organization? | ➔ How are the humanitarian principles reflected in the organization’s mandate and values? How are the staff trained accordingly? (See also 8.3) |
| 8.3 | Staff develop and use the necessary personal, technical and management competencies to fulfil their role and understand how the organization can support them to do this. | | ➔ Are staff supported in developing their competency to apply and communicate the humanitarian principles internally and externally? |

*please see next page for example of positioning in the Audit tool.*
1. Communities and people affected by crisis receive assistance appropriate to their needs.

<table>
<thead>
<tr>
<th>Guiding questions</th>
<th>Focus</th>
<th>Operation</th>
<th>Evaluation</th>
<th>Evidence</th>
<th>Findings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Design and implement appropriate programs based on an impartial assessment of needs and risks.</td>
<td>•</td>
<td>•</td>
<td>•</td>
<td>•</td>
<td>•</td>
</tr>
</tbody>
</table>

- Does organization continually evaluate justification for programs and site presence?
- Does the interpretation of data align organizational goals and values?
- Is data collection and interpretation integrated into an organizational decision-making framework?
- Does organization have both push and pull systems of receiving information on needs?
- Are programme budgets and resources allocated in proportion to identified needs?
- Are vulnerabilities identified consistently?
- Are vulnerabilities identified consistently?
- Are the response includes different types of assistance and/or protection for different demographic groups?
- Are assessment data and other monitoring data disaggregated by sex, age, and ability?
- Does the interpretation of data follow organizational goals and values?
- Does organization continually evaluate justification for programs and site presence?
III. Future horizons

In a world characterized by increasing territorialism and decreasing solidarity, the humanitarian sector struggles to defeat the competitive market dynamics. The ability of single organizations to deliver impartial assistance to those most in need is not always dependent only on their operational impartiality. Largely, especially in the case of smaller, less financially stable organizations, a fully application of impartiality is limited by external issues characterized by the collective action problem. Alas, there is only so much a small NGO can do in terms of setting up its operations, when faced with financial and/or coordination obstacles (we have titled this the limited impartiality situation). Having incorporated the new tools into the audit cycle will encourage HQAI as well as organizations themselves to bring the humanitarian principles into the spotlight. In the long run, however, HQAI and CHS Alliance are advised to focus their advocacy and tools on two larger spheres: the donor sphere and the cluster system. Below, outlined are a number of points deserving of scrutiny:

**Donor impartiality**

Up to date, little attention has been spent on the highest level of the humanitarian architecture. The humanitarian sector is a non-profit one, however, fully dependent on the funding structures available. In that regard, it is essential that donors hold themselves accountable to the humanitarian principles to the same extent as organizations concerned with aid delivery should. Only with the principles applicable across the hierarchy could the impartiality be fully operationalized. While political and other factors impede simplistic solutions, further thought should go into exploring advocacy avenues for the following propositions: allocation mechanisms of large donor agencies could be evaluated by the same impartiality criteria with which we propose to scrutinize financial allocations within single organizations: finance/aid allocation ought to be non-discriminatory, and based purely on need. Secondly, impartial donors would do well do recognize and respect the need for operational flexibility in order to facilitate response to changing needs in the field. Those most in need would be well served if the power-dynamics inherent to the NGO-donor relationship could be challenged, and held to the standard of the shared values of humanitarianism.

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77 See, most importantly, the rare contribution by Macdonald, I. & Valenza, A. (2012).
Impartial coordination

One of the most severe concerns with the non-application if impartiality in the humanitarian sphere relates to the unequal global distribution of aid. While evidence basis for dividing the total sum available among those most in need is inherently weak, fast-changing, and influenced by political interests, attempts need to be made to develop procedures by which the biggest donors and coordinating bodies decide impartially, which crises deserve to be attended to over others. In a similar manner, coordination efforts of groups of organizations and clusters could be evaluated in order to capture operationalized or lacking elements of the humanitarian principles in this sphere, which is invisible to the single-actor focus of the CHS standard. One of most important criteria, for example, could be the extent to which cluster coordinators systematically, programmatically push to address constraints faced by single actors attempting to deliver principled assistance.
ANNEXES

Annex I: Theoretical background
Annex II: Sources of knowledge
Annex III: Mapping CHS for impartiality
Annex IV: Auditor training materials
The above presented analysis rests on the foundations of social and business science theory. Annex I will introduce elements which formed the theoretical framework for this research endeavor.

Organizational theory: organizations as organisms

Organizations and their environments are correlative dependent and interrelated. Scott (2003) proves that the organization is affected by the environment in which it is situated. As Scott, modern organization theorists perceive the organization as a social sub-system performing in a broader system. Rather than isolated and encapsulated entities, organizations blend and adapt according to the environment in which they perform. As such, organization is conceptualized as a subsystem with “designed and structured process in which individuals interact for objectives”78 This contemporary emphasizes not only the relationships among individuals within the subsystem but also the relationship between the subsystem and the external forces; the fluid nature of communication and the importance of integrate two interests: the individual and organizational. This theory embraces a holistic perspective to see and analyze organizations from three different approaches: systems, socio-technical and a contingency. Specifically, these approaches allow realizing and analyzing the organization at multiple levels, dimensions, and disciplines.

Given the fluid and dynamic nature in which humanitarian organizations perform, and considering that conceptualizations and operationalization of the principle of impartiality diverge in terms of the operational context in which organizations and their staff are situated, the modern organization theory with the systems approach79 and contingency approach80 and socio-technical help us to disentangle impartially from theory to practice. And thus, to map the processes and systems that humanitarian operations should include to be impartial.

Operationalization; systems, contingency and socio-technical perspectives

The humanitarian principles are the cornerstone of the humanitarian action. Since the principled approach is what makes an operation humanitarian, the humanitarian principles should be reflected in the decision-making processes that permeate the organization at all different levels in all working units. Specifically, the principle of impartiality is reflected in the delivered-aid which should observe the criteria of non-discrimination and proportionality, prioritizing the most urgent cases. Nonetheless, before the data are analyzed and decisions taken, it is necessary to ensure that all the cases of the targeted population are indeed included, and not just one part of them. Why and how the organization decides what type of data collect? To understand the decision-making processes at organizational level modern organization theory suggests analyzing the operational environment in which is located, given its influence on the organizations’ performance. Namely, formed by all the forces (internal or

external), the operational environment has the potential to impact the organizational operations by extension the organizational behavior. Duncan (1972) divided the operating environment in two; the specific and the general. The general includes six factors: economic, political, legal, socio-cultural, demographic and technical. But according to Duncan it is the specific environment which directly influences the decisions and actions of the staff. And for him more than the general the specific is relevant to the achievement of the organizational goal. The specific organizational environment has two dimensions: institutional environment and technical environment. In order to analyze the effect of the environments on organization, Duncan proposed to analyze the three elements: organizational set, organizational groups and organizational field. Tailoring Duncan’s approach, we established organizational set as organizational identity, organizational groups as organizational structure and internal processes, and organizational field as coordination and communication with other actors.

**Organizational identity, alignment and impartiality**

Organizations committed at impartial assistance use needs assessment as a tool to guarantee that the criteria of nondiscrimination and proportionality, prioritizing, the most urgent cases would be met. The collected data reflects not only the quantity of information that organizations gather, but also the criteria to consider information as important to be included in the analysis. Organizations gather information based on the target population they seek to reach, which is determined by: a) organizational goal that it has and b) the services that the organization provides (is capable to provide).

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83 Davis and Scott 2007
The organizational goal gives identity to the organization and responds to the fundamental questions of what to deliver, when, where, how, why, and to whom. In this way, the organizational goal governs; a) the strategies, b) the services offered, c) the organization systems, structures, and processes, and d) the operational context (selection and infiltration methods)\(^84\). As a whole, each organizational effort should be towards reaching the overall organizational goal\(^85\). In the humanitarian sector, regardless the divergence in mandates and location, organizations converge in the reason for being: alleviating human suffering. Therefore; the humanitarian principles should be included along with the organizational values.

With the aligned organizational goal and strategies, within the organizational goal boundaries, organizations seek constantly to reach all the people of the target population through systems aiming at amplifying the coverage; working out adequate and operational mechanisms to collect, manage, interpret, integrate, communicate and refer the information among different units. In this connection, regardless the organizational structure used, inside humanitarian organizations, there should be a unit in charge of data interpretation— *with capacity control to integrate data to set the context and address it* – This unit, in charge of setting the search parameters, gathering, analyze and report, it also responsible for constructing an integrating framework for decision-making. Given its relevance to take decisions about where and how to organizational actions, the unit is better known as intelligence operation unit.

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84 Bart & Taggar (2001), Trevor & Varcoe (2017)

The situational or contingency approach is based on the belief that organizational systems are inter-related with the environment thus, different environments require different organizational relationships for optimum effectiveness, taking into consideration various social, legal, political, technical and economic factors. It emphasizes that organizational structure is governed by its environmental conditions and the result of the exchange between organizations and the conditions present in their environments. "The best way to organize depends on the nature of the environment to which the organization must relate". In the humanitarian space, the context-based nature of the humanitarian operations requires that information collection be dynamic, timely and coordinated from and within internal and external sources. Thus, the organizational structure should be highly decentralized with self-management principles to design the regional working units. Seeking to fulfill the criteria for impartial aid, with a decentralized self-managing scheme, each regional unit develops the procedures to receive, transfer, collect, manage and share information attempting constantly to increase capacity and coverage.

Lawrence and Lorsch (1967) discussed that an organization is a subsystem of the social system affected by factors in the environment. Therefore, an organization would be studied in the particular environment but not isolated. Humanitarian organizations do not perform alone (should not) (Hall, 2006). In the crisis space, the humanitarian sector operates along with other two sectors; the private sector and government sector. Given that impartiality takes different dimensions because it depends on what other actors are doing, and greater coverage with communication are intrinsic operational elements of impartial assistance, the organizational connectedness and network should be also decentralized, regional but global, and holistic rather than restricted. Namely, with complex operational environment with complex adaptive schemes, no central hierarchical control, and many agents acting in parallel, the network organization should include inter-organizational linkages and procedures to receive process and transfer information from all actors—government, NGO’s, beneficiaries, civil society and private organizations. To this end, the network organization with a corporate system structure made up of operating units and referral systems should be implemented.

87 Scott (1981. (Scott and David 2006).
90 A network organization is a long-term arrangement among distinct but related organizations that support the included organizations in gaining or sustaining competitive advantage (Jaramillo, On strategic networks 1988)
92 Corporate systems are systems made up of a number of different components that are not necessarily located in the same place.
Socio-technical systems; policies and processes
This section presents an assessment of impartial assistance delivered by organizations. It maps processes by which beneficiaries are reached, and proposes models to measure and improve the system performance.

Not just about enlargement of the organizational structure is important, but also transforming policies and systems into meaningful tools in hands of the staff users and beneficiaries. The socio-technical systems approach is based on the premise that each organization consists of people, technical systems and the operating environment (Pasmore, 1988). People (the social system) use tools and techniques to produce services valued by the beneficiaries (who are part of the operational environment). Therefore, equilibrium among the social system, the technical system and the environment is necessary to make the organization goal met. In this connection to analyze the level of impartiality as an organizational behavior, it is important to look at two areas; the organizational goal and the administration of the strategy at all stages: preparation, organization and conduct of the matching between services the actor is able to offer and the target population’s need. The strategy is implemented through policies, systems and processes. These also serve as main access to the different departments and units within the organization. In this capacity, the organizational effort to deliver impartial assistance should be reflected in the policies and process that shape the flows of information and communication inside and outside the organization, given that:

- the data collection functions as the first mechanism to assess the level, capacity and disposition of organizations to target certain populations and dismiss others, while information management serves as the support instrument to verify the matching with a target population.
- the communication system facilitates the filtering and treatment of information, providing parameters to dismiss certain data.

Despite variation in size and mandate, inside organizations, four main policies frame the parameters to define the target population: who, where, and how to reach, or why and when not to reach the population and what to do about it.

To guarantee a greater coverage and amplify the sphere of action, two mechanisms should be in place to trigger and direct the coordination, communication and information flows; the pull and push systems. Together both systems increase the number of requests which helps to apply the operationalization of impartiality in large scale. In sum, humanitarian organizations with pull and push systems a) increase the coverage, b) strengthen their capacity, c) provide mechanisms for referrals and d) integrate systems in charge of information management, knowledge production and communication. Sometimes it is argued that implementing both pull and push systems does not expand the coverage nor strengthen the organizational capacity. Attempts are made to correct the above argument, by stating that the size, geographical capacity, mandate and operational context shape the “request”, and therefore it does not have to be the beneficiary (PULL) or the managing director (PUSH) who order the process to start, but could be a stage in between. For example, staff officers working outside the operating range (the field), or civic society members located outside the operating environment.

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However, this is a misleading conception, the pull and push systems do not place the top managers or the direct beneficiaries as the only sources, but open the door to receive information from any source. Even for small organizations and in any complex contexts, somebody somewhere has to give the order to start addressing an issue. For this stage to occur, someone has to provide knowledge about the situation first. Enabling response to a previously unknown, sudden, or forgotten crisis, this somebody could and could be anyone from wherever the location. The push and pull systems set the process to follow the information flow from the starting point and make the request treated and processed as seriously as if it were taken from the inside of the organization’s network.

In the humanitarian sector, information from any source is relevant given the fluidity of the operating environment and the fact that those who need help may lack the capacity to submit a request for assistance. The context fluidity and a reduction in capacity to ask for help create a gap between those who experience the situation but lack the means to present a request, those who have the means to fulfill a need but ignore the situation and those who know the situation, and have the means to submit a request but lack of the legitimacy to be heard. The Pull-Push systems fill this gap. Both systems strive to create connections that make services flow and ease access to the organization, obtaining information and understanding what and where to work on next. Specifically, the pull system is a mechanism that connects processes and creates flow by including different actors from a bottom-up perspective.

The same type of flow is created in a top down environment (PUSH) by limiting the amount of processing requests through the use of project lanes. The push model relies on central planners to deploy resources in anticipation of demand and makes it easy to recognize where work is backing up and where to send supplementary resources to. Namely, push system is suitable for a fixed and relatively limited number of inputs. (Hagel & Brown, 2005)

**Push and pull systems in detail include:**

- **System of information management (collection, processing, dismiss and referral)**
  - **Sub system of requests**
    - i. Mechanisms to receive requests
    - ii. Acceptance & denial mechanisms
  - **Sub-system of socio-geographic intelligence and mapping**
    - i. Mechanisms to process information
    - ii. Mechanism to verify information
    - iii. Mechanisms to map (monitoring)
    - iv. Mechanism to share information

- **Bidirectional communication system**
  - a. Mechanisms to internal communication to manage and process requests
  - b. Mechanisms to external communication to manage and process requests
Organizational culture, sector culture: theories and analysis

Developing a model of how organizational culture is formed, learned, passed on, and changed, we aim to provide a common frame of reference for understanding and identifying the dynamic and evolutionary forces within humanitarian organizations that facilitate the application of impartiality. We propose a multi-level analysis to begin to identify its essential elements.96

Organizations produce institutions which are not only constituted by formal organizational arrangements, but also by norms, *symbolic systems*, basic assumptions, *moral archetypes* and rituals 97 they as whole provide a meaning system—98 which guides peoples ‘action and affects their primary preferences to cooperate and work with other actors.99. As an encoded guide, this system provides structure and meaning to the group’s members, “The basic pattern of assumptions that a given group has invented, discovered, or developed in learning to cope with its problems of external adaptation and internal integration, and that have worked well enough to be considered valid, and therefore, to be taught to new members as the correct way to perceive, think, and feel in relation to these problems.” (Schein 1984)100 The meaning system is created, adapted and reproduced in the operating environment101. These processes function as an analytical grid through which the staff from organization see and perceive their operating environment. Specifically, the operating environment is molded by two dynamic forces; a centripetal and a centrifugal, from inside the organizations to outside and vice versa.

The centrifugal force relates to formal rules (code of conduct, systems, policies and processes)102 which help to direct the decision-making process, but, they become unconscious only when they are internalizing through repetition, consistency and the application of social sanctions103. Specifically, two mechanisms from the formal rules, and encode the unconscious behavior: a) the level of training in the organizational goal, b) the operating system design and processes. And c) the internationalization of formal rules in a consistent and fluid manner (Wood & Neal, 2007). When the formal rules are applied in a regular, consistent and repetitive manner, not only it encodes unconscious behavior but also gives a sense of security and identity which creates attraction; rather than acquiring behaviors we are acquired by them (Shove, 2012)

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96 Purposely we wrote *key elements* because to describe an entire culture is not feasible. Nonetheless, it was possible to get at enough elements to make some of the key phenomena in the humanitarian organizations and their sector culture comprehensible.


98 Organizational culture is defined by Schein as a “pattern of shared basic assumptions that was learned by a group as it solved its problems of external adaptation and internal integration, that has worked well enough to be considered valid and, therefore, to be taught to new members as the correct way to perceive, think, and feel in relation to those problems” (Schein, 1985) (Schein,2004 p. 17). For the purpose of this report use meaning system and organizational culture as interchangeably concepts.


100 Schein, Edgar H. "Coming to a New Awareness or Organizational Culture." Sloan Management Review, 1984: 3-16.

101 For operating environment, we refer to the area where staff from humanitarian organization perform their activities; offices, field, etc.

102 Schein, Edgar H. "Coming to a New Awareness or Organizational Culture." Sloan Management Review, 1984: 3-16.

On the other hand, the centripetal force is built up by artifacts (visible and invisible) - symbolic system, basic assumptions, rituals, moral archetypes, jargon, social norms, events, stories, and material symbols like facilities - (Schein, 1984) (North, 1991). This system\textsuperscript{104} is created by the expectations, perceptions, feels and beliefs of internal and external actors (internal staff, potential beneficiaries, civil society and stakeholders) which sometimes perform as counterculture (Martin & Siehl, 1983). All of them are codified unconsciously as learned responses - underlying assumptions to the organization survival in its environment and its internal integration (Schein, 1984) (Ekwutosi & Moses, 2013). Namely, shared by members of the organization, unconsciously, artifacts define the basic taken for granted dimension through which the organization views itself and its environment. It determines what it must do to be a success. (Kennedy, 2000, pág. 13) (Shein, 1985) (Schein, 1984). Consequently, organizations develop its own meaning system and different levels of adaptation, creating organizational cultures, subcultures and temporary cultures; I do what I do because it makes sense to do it\textsuperscript{105}. To recognize an underlying assumption is sufficient with finding rejections to discuss something, or find discussing the point as enlightening the ignorant.

According to Schein (1985), organizational culture could be analyzed at several different levels, however for the purpose of this research we only focus on two levels:

- **Level 1**: Visible artifacts: the constructed environment of the organization, its architecture, office layout, manner of dress, visible or audible behavior patterns, and public documents such as charters, employee orientation materials, stories.

- **Level 2**: Take for granted dimension: Understanding the group behavior is to understand the values that govern their behavior and given that those remain on the underlying assumptions which are concealed or unconscious, most of them could be obtained through what people take for granted.

We were interested mostly in the second level, the take for granted dimension which determine how group members perceive, think, and feel about impartiality. Such assumptions are themselves learned responses that originated as values. For humanitarian organizations behaviors related to impartiality rested on six interconnecting key assumptions. These are outlined below, along with examples as collected during fieldwork.

\textsuperscript{104} Differing from the traditional view of institutions and also disagreeing with Deal and Kennedy (2000) that organizational culture is shaped by outside influences rather than by the individuals inside the company. Our findings suggest that the culture is shaped by both outside and inside forces in a dynamic and fluid manner.

\textsuperscript{105} The moral reasoning process is not described in the final report however, it is portrayed in the anexes with moral theory.
### Key assumptions

<table>
<thead>
<tr>
<th>Individuals are capable of taking responsibility and doing the right thing:</th>
<th>It is in our DNA, the humanitarian lenses. (K14, 2017)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Organizations and their staff do not become humanitarian, they have embedded it in their value system</td>
<td>The principles are deeply anchored in the xxx institutional culture. … Might be linked to the Swiss identity,…, the history…</td>
</tr>
<tr>
<td>… how we look at a new field, we look at it through the prism of principles. Used as a matrix to look at an issue. Not always in a very explicit manner. Intuitively applied as a matrix to look at a problem. (K11, 2017)</td>
<td>… and it is not something I think you have naturally to the same extent in all humanitarian organizations. (K17, 2017)</td>
</tr>
<tr>
<td>Moral dilemma: the basic work of humanitarian organizations is alleviating human suffering and such works is and should be always saving peoples’ lives, placing “people at the center”</td>
<td>“For instance, if you want to take a certain road that leads to the place that is most affected, and there are places along the road that are also affected but on a lesser level. In theory, you might not have included these communities if you only look at priority needs…. It is very difficult to not include these communities, and maybe these trucks stay there overnight (drivers sleep there), and say “well, you are hungry but the people over there are more hungry” (K12, 2017)</td>
</tr>
<tr>
<td>If you are not saving people’s lives, what are you doing? The moral dilemma</td>
<td>… Usually you come for them (the most vulnerable), when you enter a country is usually because there is an emergency somewhere and you have already identified the kind of crisis that they are facing. (K15, 2017)</td>
</tr>
<tr>
<td>Project-program level overestimation</td>
<td>Some organizations may be too small to have the level of professionalism. But you can expect from most actors to know that the humanitarian principles stand for (K17, 2017)</td>
</tr>
<tr>
<td>Family identity:</td>
<td>… When you arrive to a country as a hum organization you have to look for the most vulnerable….. (K15, 2017)</td>
</tr>
<tr>
<td>A shared understanding of the humanitarian principles and their operationalization exist; “we all know what are they and how they look like”</td>
<td>the XXX just created a community of practice on the implementation of humanitarian principles for practitioners to feed in their experiences - how to make compromises and choices. (K15, 2017)</td>
</tr>
<tr>
<td>Humanitarian organizations share and perceive the values in the same way.</td>
<td>(to know where the most in need are)</td>
</tr>
<tr>
<td>The experience is ultimately the source of application of the humanitarian principles</td>
<td>It’s a matter of experience. Usually when you are in a country, we have been there for many many years. The level of expertise is increased by number of years. It’s rarely a secret. (K15, 2017)</td>
</tr>
<tr>
<td>“for me it has been more useful to work with people who are good at understanding the principles and applying them, rather than the course itself. My boss has a law background,</td>
<td></td>
</tr>
</tbody>
</table>

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106 Quotes used in this section are shared as they were spoken during interviews. In contrast, the preceding report contains quotes that have been approved (and lightly edited) by the key informants in follow-up to the interviews.
and is generally a very capable professional, so I have learnt a lot more from him than I have from a course, because you have to respond to very specific situations. (K12, 2017)

### Awareness of absence and silence

| a) | in the humanitarian space are only humanitarian organizations but private sector. |
| b) | We know we are not doing something. |

I think it lies in a much more sophisticated understanding of what the humanitarian architecture looks like. Right now it’s IASC, iNGOs and the UN, and the local NGOs. That’s a very unsophisticated way of thinking about it (KI7, 2017)

Who are the actors around me? Donors, government, UN, populations in need, other NGOs, local groups, HQ (KI8, 2017)

the information we get comes from people directly. basically we go somewhere and we assess the situation.

We deal with local authorities, local leaders, local communities. (KI5, 2017)

...we suspect in some of these areas the needs are extreme, but we were not working with those communities. (KI5, 2017)

The NGOs are lacking really concrete coordination mechanisms and data just because the coordinations mechanisms (cluster systems) want to do too well and are very focused on the information rather than the operationalization... I couldn’t do anything... we collect info and we mostly use it as the tool for advocacy. To say we have that kind of coverage, that kind of funding in the country, we have this information that is not really useful for day to day operations (KI5, 2017)

An additional element of the operating environment is the sector culture which like the organizational structures, affects the organizational behavior. These four additional assumptions reflected some of the group’s beliefs and values pertaining work and coordinate with other actors which complement the six previous assumptions.

<table>
<thead>
<tr>
<th>Key Assumptions</th>
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<tbody>
<tr>
<td>Moral superiority in regard to other actors from different sectors; To be called humanitarian action, this should be provided only by recognized humanitarian organizations</td>
</tr>
<tr>
<td>Emergence of new actors, quasi-NGOs. Companies doing medical work. Some ‘mercenary’ types. New York medics, Aspen. Good thing or bad thing? What are they guided by? Set of principles? Well…. we were not there. They filled a gap. (KI7, 2017)</td>
</tr>
</tbody>
</table>
### Superior competence in addressing human needs

**Applying the humanitarian principles - superiority in action, understanding and capacity.**

Underestimation among organizations)

- "for organizations not with the same reach as XXX, non-discrimination is the bottom line...", ..."Those principles tend to be a mantra in the broader humanitarian sector, despite the obvious that most organizations are not able to apply them". (K11, 2017)

- once you have a big machine coordination process created by the UN, nobody questions them. UN is a huge, huge machine. (K15, 2017)

The principles are deeply anchored in the xxx institutional culture. More so than in a number of organizations I think. Might be linked to the Swiss identity, the mandate in international law, the history (K11, 2017).

And given that implementing partners often are national NGOs, they do a good job but are embedded in a particular context where pressures to serve one group over the other are much higher on them than on the UN. (K12, 2017)

...And many NGOs are too small, they are very focused, specialized. They already have specified beforehand what the issues are they will look at. (K18, 2017)

NGOs are entirely happy to be the implementers in relation to the UN, or the Donor, not being critical. And the donors do not expect NGOs to question their information. (K18, 2017)

### Competition among organizations: Donors founding’s; an enable slaver

Donors make behave organizations in a certain ways

One thing you have to look at closely is how much the organizations are trying to diversify their funding or to negotiate the terms of funding to their donors. Can be a strong impediment to the impartiality of the response. (K11, 2017)

If needs are really localised, you might accept earmarked funding to a specific region, because you know there is nothing in the immediate vicinity that might need to ‘compete’ for that funding (K11, 2017)

I don’t need to submit a proposal if I think something should be done in a particular area. So we are freer in that--- How the funding allocation process was managed probably really lowered the quality of the response (K12, 2017)

But in theory, the more you have flexible funding the more you can be guided by humanitarian needs alone as opposed to things that look good in the news or things that are ‘flashy’. (K12, 2017)

...the UN is not only a partner, but also a donor for many NGOs, so some were afraid that the UN would take it badly that we didn’t participated in their joint assessment with the gov. (K17, 2017)

...There isn’t enough cohesion across NGOs - there is too much competition. ......NGOs that are largely dependent on institutional donor funding. What you get is much more of a developmental approach - the donors put out tenders. NGOs have to bid for a certain projects that the donors put out. (K18, 2017)
**Principled Pragmatism:** The humanitarian principles are not rigid framework; it is an enabler.

a) Practicality over data

b) There is no perfect impartial operation

...but I think the picture is quite incomplete. It is quite difficult to have enough data to really priorities. So then it also boils down to what area you want to work in as an organization, which areas do you have access to. So there are a number of practical considerations that kind of water down the more rigorous application of impartiality overall. (KI2, 2017)

...but my job was to ask ‘how do we practically know what are the most urgent needs’. (KI2, 2017)

The compromises, the way we articulate these principles is really context-based and really field-oriented. It’s not a theory, it’s really practical. (KI5, 2017)

....you need to have the field knowledge to show the organizations, to make an argument that something is not being done / covered. You need a story backed up by data. (KI7, 2017)

....because the perfect impartial operation has never existed and will never exist. But I want to see that awareness. If you don’t have that it has become a self-fulfilling enterprise. (KI7, 2017)

...So you will never deliver perfectly impartial aid, you will never be completely neutral or independent. (KI1, 2017)

We operate in a situation where it’s impossible to apply the principles in the best possible manner, because of the conflict. (KI4, 2017)

The elements formed a culture paradigm which affects the internal workings of the organization attitudes, and performance in respect to:

- The politics and logistics for coordination and communication among the different working units at different levels (the more bureaucratized structure is, the greater the spur for dysfunctional dynamics.)
- Responses to perception and expectations (relation with the Government, other NGO’s, organizations from private sector and UN agencies)
- Communication and operation with different actors, beneficiaries, target populations, and civil society (to what extent incorporate communication channels to receive requests from different sources)
The culture model: adaptation of Schein (2014)
Methodological Approach

The research team conducted its work using mixed methodologies from the fields most relevant to the research question(s) and the topic. Thus, the chosen methods range from standard social science methodologies such as ethnographic observation, semi-structured interviews and desk review, to more topic-specific and innovative tools adapted from the fields of organizational development and management systems audit. The triangulation of our data collection methods is aimed at increasing the validity of our findings. The below section outlines all methods used, justifies their fitness to the research task, and, lastly, discusses their limitations.

Because collection of large-scale data on organizational decision-making in humanitarian assistance was beyond the scope of this project, methods selected were of qualitative nature. Exploratory and descriptive methodologies are particularly helpful in mapping of the humanitarian field’s theory, and practice (including organizational culture), while explanatory methodologies help in testing validity of proposed tools.
### Social Science methodologies

<table>
<thead>
<tr>
<th>Method</th>
<th>Fitness</th>
<th>Limitations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Topical Literature Review</td>
<td>Provides an accurate picture of topic and its academic and practical interpretation. Enables formulation of questions, generation of research plan and objectives. Facilitates discovery of applicable analytical tools.</td>
<td>Limited availability of previous literature, documents, data.</td>
</tr>
<tr>
<td>Semi-structured interview</td>
<td>Enables follow-up and flexibility in questioning. Generates otherwise unattainable data on attitudes, opinions, and values. Informal atmosphere encourages information sharing and building of research partnerships. Provides opportunity for expert evaluation of results.</td>
<td>Time consuming for both researchers and respondents, limited number possible, Limited generalizability.</td>
</tr>
<tr>
<td>Case study research</td>
<td>Captures systemic complexity, traces and contextualized processes through dimensions of organizational decision-making.</td>
<td>Limited generalizability.</td>
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### Organizational Development tools

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<thead>
<tr>
<th>Method</th>
<th>Fitness</th>
<th>Limitations</th>
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<tbody>
<tr>
<td>Organizational analysis</td>
<td>Enables mapping of organizational structures, processes, and values, as well as identification of critical moments of organizational decision-making, relevant actors and modes of problem-solving.</td>
<td>Time-intensive, simplistic, and case-specific.</td>
</tr>
<tr>
<td>Critical Incident Interview Technique (CIT)*</td>
<td>Enables interviewer to capture thought process, values, and frames of reference of interviewee regarding an event. Highly applied, focused interview technique producing reliable data.</td>
<td>Limited generalizability, time-intensive.</td>
</tr>
<tr>
<td>Repertory Grid*</td>
<td>Provides opportunity to collect information regarding behaviour perceived as standard at a workplace and traits, behaviours, values which are preferable to the surveyee. Tool for comparing organizational culture to individual preferences of humanitarian workers. Elicits reflexivity on part of the respondent. Can be used in both interview or online survey setting.</td>
<td>Limited generalizability.</td>
</tr>
<tr>
<td>Cognitive Mapping*</td>
<td>Can be used to visualize organizational structures, identifies key moments for decision-making, preserves nuance, relations, and complexity.</td>
<td>Time-intensive, Pending interviewee-willingness to engage in exercise, difficult to process.</td>
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</table>

*adapted from Neuman, L.W. (2014), Social Science Research Methods, 7th Ed., Pearson Education Limited, p. 38, 42, and Bhattacherjee, A. (2012), Social Science Research, Creative Commons Attribution, p.54, 73

### Audit tools (ISO 19011)

<table>
<thead>
<tr>
<th>Method</th>
<th>Fitness</th>
<th>Limitations</th>
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<tbody>
<tr>
<td>Compliance verification **</td>
<td>ISO 19011 guides the process of document review, evidence gathering, evaluating against criteria, compiling and structuring, as well as reviewing audit findings. These methods are well described guidelines of verifying compliance to a standard, such as CHS or the impartiality index. The tool provides terminology and process guidance appropriate to this research task.</td>
<td>- (appropriate in given context)</td>
</tr>
<tr>
<td>Tell me-show me technique **</td>
<td>Interview technique focused on gathering information on compliance with a standard throughout organizational process.</td>
<td>-</td>
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</table>

As this research does not aim to prove the external validity of a hypothesis, but rather, applicability of a new perspective for the application of impartiality, concerns with internal and external validity in research design are less severe.

Development of practical tools was based on triangulated data sources, including expert interviews and evaluation science professionals to ensure practicality and effectiveness. For the purpose of consulting the tools, we relied on snowball sampling techniques for expert interviews. Given well developed relationship with our partner and associated institutions (HQAI, CHS Alliance), as well as contacts made during events attended (see below) and the size of the humanitarian field, using the snowball method allowed to use the available resources with more efficiency for the research.

The practical implementation of tools proposed throughout the audit training and data-gathering stages will be subject to HQAI’s decision upon reception of the full deliverable package. The primary sources used are elaborated on the next pages:

** Adopted from ISO 19011 Training materials provided by CALISO 9000.
Key Informant Interviews

In seeking in to map obstacles to the application of impartiality in the humanitarian practice, the research team interviewed humanitarians with diverse geographical experience working across all levels of the sector: from field office program manager to top-level humanitarian policy advisors of the biggest international organizations.

A list of the types of experts consulting on the project is presented on the right to provide an approximate overview of the sources of evidence. Due to the sensitive nature of discussions regarding specific events and situations illustrating limits to application of humanitarian principles in practice, names of our informants have been anonymized, unless specifically requested otherwise. Where deemed appropriate, also names of organizations are redacted.

- Senior expert on humanitarian principles, International Committee of the Red Cross
- Junior field officer, International Committee of the Red Cross
- Senior academic expert focusing on humanitarian action and international development
- Director of an organization focused on analytics and needs-assessment in humanitarian contexts
- Aid coordination expert with a medium-sized humanitarian organization
- Humanitarian cluster coordinator with experience in small and mid-sized humanitarian organizations
- Senior leader in UN Office for Coordination of Humanitarian Affairs
- Senior expert on humanitarian policy, international think-tank HERE-Geneva
- Junior experts from the Policy Team, Core Humanitarian Standard Alliance
Event and training participation

For the duration of the project between May and December 2017, the research team attended offline and online learning events engaging the humanitarian community in discussions topics relevant to the research questions. These exchanges frequently inspired new research trajectories and facilitated exchange with a variety of actors involved in the field. The team also took part in available trainings both to gain knowledge, connect with peers, and observe training standards and culture. The most notable events are listed:

- HQAI Learning Event: Measuring Impartiality, Geneva, 13/6/2017
- E-Learning Course on the Core Humanitarian Standard, KayacConnect.org, web, 7/2017
- Learning Stream on Humanitarian Coordination: NGO fora and consortia from local to global, PHAP, web, 20/7/17
- Learning Stream on Humanitarian Coordination: The humanitarian coordination architecture at country and regional levels, PHAP, web, 22/7/2017
- Learning Stream on Humanitarian Coordination: OCHA and NGOs in humanitarian coordination, PHAP, web, 14/9/2017
- ISO 19011 Auditing Management Systems Training, web, 9/2017
- HQAI Auditor Training, web, 3-6/9/2017
- Contested Evidence: The challenges and limits of evidence-based approaches to humanitarian action., PHAP, web, 7/11/17
HQAI Audit Reports and Materials

All 18 of HQAI’s Audit reports and Audit Results Summaries available up to November 2017 were analyzed as primary materials in this research project. These reports were subject to confidentiality agreement, and no data specific to particular organization are directly cited in this report.


Standards Literature

- ...
Critical Issues in the Field

Data on specific humanitarian contexts and debates are sourced from recent publications, including ones specifically focusing on the need to re-evaluate application of humanitarian principles. Most relevant sources of such kind are listed below:

- IFRC (1994). Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief.


ANNEX III:
Mapping CHS for Impartiality (detailed overview)

Reference
The full CHS was mapped by the research team prior to the presented analysis. Each requirement of the CHS was analyzed through the lens of all existing guidance materials in order to determine, whether the associated indicator could be used to observe organizations’ operational impartiality. Due to size constraints of this report, this mapping is included in a separate document:

Please see “Mapping CHS for Impartiality.pdf”
Impartiality training
The process of becoming an HQAI auditor involves participation in an intensive five-day auditor training and subsequent practice audit rounds. The initial training covers a thorough overview of the Core Humanitarian Standard, Audit techniques, including collection and analysis of evidence, as well as specific modalities of the HQAI offer for organizations. Assuming that auditors are familiar with the CHS, the training does not include a module on the humanitarian principles. In attempting to pay greater attention to organizations’ ability to operationalize the humanitarian principles in the audit, HQAI is advised to explicitly train its auditors on the humanitarian principles in addition to the CHS. The research team has prepared two training modules which will be suitable in style and format for incorporation into the existing training syllabus. Specifically, the package consists of two video-lessons, and a set of electronic materials to aid the learning/review process. The thematic areas covered will be 1) Operationalizing Impartiality in organizations, and 2) Organizational values, processes, and action.