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Drivers and Inhibitors of Change in the Humanitarian System

A Political Economy Analysis of Reform Efforts Relating to Cash, Accountability to Affected Populations and Protection

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Why has it been so difficult to reform the humanitarian system? Simply put, good intentions alone are not enough. This study thinks through three long-standing reform proposals to their respective ends. The analysis shows where the reforms conflict with the self-interests of humanitarian organisations and donors. It recommends to: invest in stronger assessment and analysis capacities of operational organisations; support the consolidation of the humanitarian actor landscape; rely more on diplomatic representations to negotiate with host governments; and, give priority to supporting the cash reform.

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Acronyms

AAP	Accountability to Affected Populations
ALNAP	Active Learning Network for Accountability and Performance in Humanitarian Action
CaLP	Cash Learning Partnership
CashCap	Cash and Markets Capacity Building Roster
CHS	Core Humanitarian Standard
DG ECHO	European Commission's Humanitarian Aid and Civil Protection Department
DPA	United Nations Department of Political Affairs
ELAN	Electronic Cash Transfer Learning Action Network
FAO	Food and Agriculture Organization of the United Nations
HAP	Humanitarian Accountability Project
HC	Humanitarian Coordinator
HCT	Humanitarian Country Team
IASC	Inter-Agency Standing Committee
ICRC	International Committee of the Red Cross
NGO	Non-Governmental Organisation
ODI	Overseas Development Institute
OHCHR	Office of the United Nations High Commissioner for Human Rights
ProCap	Protection Standby Capacity Roster
PSEA	Protection from Sexual Exploitation and Abuse
RC	Resident Coordinator
UK DFID	United Kingdom Department for International Development
UN	United Nations
UNCT	United Nations Country Team
UNDG	United Nations Development Group
UNHCR	Office of the United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Emergency Fund
USAID	United States Agency for International Development
WASH	Water, Sanitation and Hygiene
WFP	World Food Programme

Summary Report

This study analyses the drivers and inhibitors of change in the humanitarian system. It focuses on three reform efforts: cash-based emergency response, accountability to affected populations and protection. For each area, the study explores four questions to help explain why reforms are successful or unsuccessful, and to generate ideas for the more effective promotion of reforms:

- What exactly is the reform proposal?
- What would the humanitarian system look like if the proposal were fully implemented?
- How would these changes affect the self-interests of important stakeholder groups?
- What are the policy implications of these reflections?

The study does not explore factors beyond self-interest that could also help explain why stakeholders support or do not support a reform, and it assumes the proposed reforms are likely to improve humanitarian assistance.

In this summary report, we identify the patterns that cut across all three reform efforts before outlining each area.

I. Common Findings

First, **key reform concepts are unclear**. In what has been described as "organised hypocrisy",[I] different actors maintain different interpretations of what a reform proposal entails. This makes it easier to reach political consensus on a reform, but harder to subsequently implement it. Cash-based assistance, for example, can mean giving people unrestricted cash or vouchers for restricted use. For accountability to affected populations, there is the question of how much decision-making power should be transferred to aid recipients. In protection, it remains unclear how to effectively execute the responsibility of advocating for a stop to rights violations when that responsibility is shared by multiple actors.

Second, we would expect the reforms to **lead to a consolidation of actors and to a stronger role of assessments and analysis**. In all cases, effective implementation of the reform would require working with fewer organisations (i.e., larger organisations or consortia), a more geographic division of labour and a stronger multi-sector approach. Cash programmes would account for around 40 percent of total humanitarian spending and would be implemented as large, multi-sector programmes. To allow for the effective

I Brunsson, N. (1989) The Organization of Hypocrisy: Talk, Decisions and Actions in Organizations; Krasner, S. D. (1999) Sovereignty: Organized Hypocrisy; Lipson, M. (2006) Organized Hypocrisy and Global Governance: Implications for UN Reform.

participation of affected people, humanitarian organisations would have to consolidate per area and be able to respond to varied needs. In protection, lead agencies would be appointed for each area to enable effective engagement and advocacy. As a result, multi-sector organisations would gain in prominence compared to organisations with a single-sector mandate, and clusters would lose relevance.

In addition, the reforms all require more data gathering and better analysis of, for example, market conditions, aid recipient feedback and protection concerns. The profiles of humanitarian field staff would have to change accordingly.

Third, the reforms **entail trade-offs for inclusiveness and equity**. If the reform efforts lead to a consolidation of actors, there would be a trade-off between effective reform and the humanitarian system's diversity and inclusiveness. Large cash programmes, consortia with common feedback and participation mechanisms, and designated protection leads would make it more difficult for smaller and local organisations to participate in the response. This contradicts efforts to support a more localised response.

The reforms are also easier to implement in certain environments – for example, localities with functioning markets (cash reform), camps (accountability reform) and areas with low security risk for field workers (protection). If more resources are directed to areas where reforms are successfully implemented, there could be an even greater concentration of aid in these comparatively easy settings.

There are also trade-offs between the different reforms. Using cash as the default option, for example, could make it more difficult for protection organisations to negotiate access, as they can no longer use their assistance programmes as a bargaining chip. The participation of local groups in decisions relating to the allocation of aid could increase local tensions and conflict with humanitarian principles.

Fourth, **those with the greatest power to affect reforms are often not those with the strongest interest in their success**. As the overview in Table I shows, donors are consistently one of the most powerful stakeholder groups. But the proposed reforms are only partially in line with their self-interests or, in the case of accountability to affected populations, even run counter to them. Therefore, active donor support for the reforms requires normative or political commitment. Host governments also have strong power and are the most dangerous potential reform spoilers. Whether they consider themselves winners or losers of a reform effort depends on many factors specific to the in-country situation – not least how strongly governments identify with "Western" values and institutions, since the reform areas resonate strongly with the classic canon of market economy, representative democracy and the rule of law. The interests of humanitarian organisations are heterogeneous.

Table I: Overview of stakeholder power and self-interest per reform area

	Shift to cash	Accountability to affected populations	Protection
Donors	Power ★★★ Self-interest +	Power ★★★ Self-interest −	Power ★★★ Self-interest +
Affected governments	*Governments with social safety nets:* Power ★★★ Self-interest + *Other governments:* Power ★★★ Self-interest −	Power ★★★ Self-interest ?	Power ★★★ Self-interest −
Humanitarian organisations	*Potential leads:* Power ★★☆ Self-interest + *Non-leads:* Power ★☆☆ Self-interest −	*Multi-sector organisations:* Power ★★★ Self-interest + *Single-sector organisations:* Power ★★★ Self-interest −	*Potential leads:* Power ★★☆ Self-interest + *Non-leads:* Power ★★☆ Self-interest −
Affected population	Power ★☆☆ Self-interest +	Power ★☆☆ Self-interest +	Power ★☆☆ Self-interest +

Finally, **the proposed shift to cash meets the most positive constellation of interests and is thus the most likely of the three reform efforts to succeed**. The cash reform would also strengthen accountability to affected populations, but through means different from those proposed by the reform – that is, through a transfer of purchasing power to aid recipients.

Accountability to affected populations has the least promising constellation of interests, and its implementation would require the serious normative or political commitment of key stakeholders. When implemented, however, the accountability reform would lead to more field presence of humanitarian workers and to greater satisfaction among aid recipients. This would make it easier to gain access and advocate for protection.

Policy Implications

I. Develop a holistic vision of change that defines priorities or mitigation measures where there are trade-offs.
II. Support the consolidation of the international actor-landscape, while at the same time strengthening the localisation of aid. For example, reduce support to small NGOs based in donor countries and invest in pooled funds that support local organisations.
III. Develop credible mechanisms for continuing to provide support in difficult operational contexts.
IV. Invest in stronger assessment and analysis capacities of operational organisations and other entities (e.g., market assessments).
V. Give priority to supporting the cash reform as a comparatively low-hanging fruit that has positive synergies with other reform areas.
VI. Invest in communicating and expanding the evidence base for reform to rally more supporters around specific proposals.
VII. Rely more on diplomatic representations to engage with host governments to ensure their support for the reform efforts.

Policy Implications for the Cash Reform

I. Explicitly commit to making cash the default mode of humanitarian assistance, and conduct a public image campaign for cash programmes.
II. Pilot large, multi-sector cash programmes, award them competitively to the agency or the consortium best placed in each given context, and invest in evaluating their relative cost-efficiency.
III. Invest in gathering and communicating data on the preferences of aid recipients.
IV. Make a commitment to continue funding for non-cash components of a response and to accept significantly higher programming costs for these.

Policy Implications for the Accountability Reform

I. Resist a one-size-fits-all approach. Tailor initiatives for stronger accountability to affected populations to specific contexts. Remain wary of imposing even more demands on humanitarian organisations operating in difficult circumstances.
II. Ensure that checks and balances accompany the accountability reform, which mitigate potential conflicts with humanitarian principles and possible negative side effects on community coherence and local power structures
III. Create financial incentives for humanitarian organisations to take accountability to affected populations seriously – for example, by linking funding decisions to beneficiary satisfaction and by offering more-flexible funding arrangements.

Policy Implications for the Protection Reform

I. Promote the idea of designating individual organisations as area-based protection advocacy leads. Support the development of a transparent and competitive mechanism for assigning lead roles.
II. Work with potential advocacy leads to promote the reform. Donors can support them in setting up related capacity mechanisms (e.g., staff rosters) and in their advocacy work to mitigate risks of expulsion and/or the financial consequences of expulsion. Donors should also provide longer-term funding for protection advocacy.
III. Manage a consultative process with UN actors that are mandated with protection to ensure their buy-in to the reform. For example, stress the sustained relevance of the protection cluster in national-level protection advocacy, and clarify the links between area-based leads and the protection cluster.

II. Cash Transfers as the Default Mode of Humanitarian Assistance

If cash-based programmes were the default delivery modality:[II]

- **Between 37 and 42 percent of the total humanitarian budget would be allocated to cash-based programmes**. Cash programmes would be delivered in 70 to 80 percent of all humanitarian contexts. There, they would account for different shares per sector, ranging from food (~90 percent) and shelter and non-food items (~70 percent), to education (~30 percent) and sectors where cash would not be used at all (e.g., protection).
- **The actor-landscape would consolidate.** Cash programmes would be implemented as large, multi-sector programmes, leaving one or a very small number of competitively selected organisations or consortia responsible for the implementation of the cash programme in any given area ("cash lead"). This would also decrease the relevance of sectors as an organising principle for humanitarian assistance.
- **The ability to implement non-cash programmes would reduce.** With fewer economies of scale for in-kind programming, this type of assistance would become more expensive. Organisations might also find it more difficult to gain access to deliver normative components of their work, including protection and those related to gender.

II Reform proposal based on High Level Panel on Humanitarian Cash Transfers (2015) Doing Cash Differently; High Level Panel on Humanitarian Financing (2015) Too Important to Fail – Addressing the Humanitarian Financing Gap; World Humanitarian Summit Synthesis Report (2015) Restoring Humanity; guidance documents of several organisations.

Stakeholder Self-Interests and Power to Affect the Reform

Power	★★★
Self-interest	+

Donors have strong power to affect the reform. Alone, even an important donor could dedicate its funding in specific contexts to large, multi-sector cash programmes. On balance, we expect donors to win from the reform.

Illustration I: Key wins and losses for donors

Wins

- The evidence for the benefits of cash is strong. By supporting cash, donors can demonstrate that they act on evidence.
- Cash has proven to be more cost-efficient to deliver than in-kind aid.

Losses

- Cash contradicts the classic image of charity held by tax payers and other relevant stakeholders.
- Should something go wrong with new, large-scale cash programmes, there could be negative publicity and public backlash against the donor.

Governments with social safety nets:	
Power	★★★
Self-interest	+
Other governments:	
Power	★★★
Self-interest	−

Affected governments also have strong power to promote or spoil the reform, as they can request the use of cash transfers, or prohibit or delay them through regulation. We expect affected governments to retain heterogeneous positions on the shift to cash, depending on their level of concern for legitimacy and the existence of social protection programmes.

Illustration II: Key wins and losses for affected governments

Wins

- Stronger legitimacy where cash programmes link to existing social safety protection programmes.
- Cash programmes benefit the local economy.

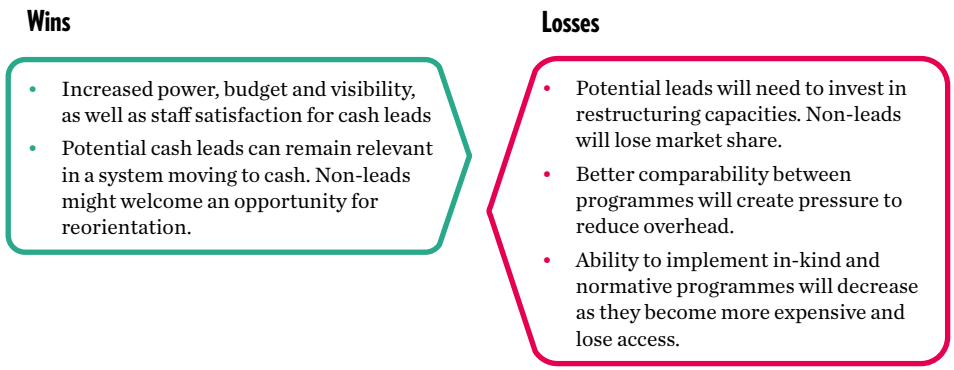
Losses

- Cash might create dependency and the pressure to introduce social protection programmes.
- Cash programmes might increase tensions with host communities if they do not receive similar benefits. They might also create incentives for displaced people to stay.

Potential leads:	
Power	★★☆
Self-interest	+
Non-leads:	
Power	★☆☆
Self-interest	–

Humanitarian organisations have a medium (potential cash leads) to low (non-leads) degree of power over the reform. If the shift to cash seems inevitable, the expected wins outweigh losses for potential cash leads. Non-lead organisations will lose from the implementation of the reform.

Illustration III: Key wins and losses for humanitarian organisations



Overall, the constellation of interests is favourable for the implementation of the cash reform. Donors, well-intentioned host governments and operational organisations hoping to lead large-scale cash programmes have an interest in promoting the reform. Among the likely opponents, only host governments have the power to prevent the shift. Non-leads would lose, but they can do little to stop the reform.

III. Making Accountability to Affected Populations a Reality

If affected populations meaningfully participated in decision-making across the entire programme cycle:[III]

- **Agencies would grant accountability to affected populations voluntarily**, and compliance with humanitarian principles would take precedence over the will of affected populations where those are incompatible.
- **Inclusive communication, participation and feedback/complaints mechanisms** would be put into practice and recognised by all relevant staff, across all humanitarian organisations and crises, and across the entire programming cycle.
- In well-served crises, **actors would consolidate at the local level** to link effectively to different representative structures. As a result, there would be more

III Reform proposal based on Inter-Agency Standing Committee (2011) Five Commitments on Accountability to Affected People/Populations; CHS Alliance (2014) Humanitarian Accountability Report.

consortia or larger, multi-sector organisations, and clusters would diminish in importance.

- **Donors would use satisfaction data** from the affected population as a criterion for funding decisions and agree to **more-flexible funding schemes** so that humanitarian organisations can react to community feedback.

Stakeholder Self-Interests and Power to Affect the Reform

Power	★★★
Self-interest	–

Donors have strong power to implement or spoil the accountability reform effort. They could use aid-recipient satisfaction data as a criterion for funding and provide more-flexible funding. From a perspective of self-interest, however, they stand to lose from the reform.

Illustration IV: Key wins and losses for donors

Wins

- Direct feedback from affected people to donors increases donors' ability to monitor implementing agencies.
- More information from aid recipients about priorities facilitates decision-making.
- More locally-led response leads to increased legitimacy with host countries.

Losses

- Reduced ability to align with organisational and political priorities
- Reduced control over humanitarian budgets might reduce legitimacy in view of parliaments and tax payers.
- Potential challenges in providing multi-year funding are necessary for participation.

Power	★★★
Self-interest	?

Affected governments have strong power to promote or hinder the reform. Whether they stand to win or lose from the accountability reform is context-specific. It is likely that most authorities will adopt an ambivalent strategy, trying to maximise gains, while minimising losses.

Illustration V: Key wins and losses for affected governments

Wins

- Increased legitimacy as a result of local perceptions of governments as steering the international response; greater ability to use humanitarian aid for local political campaigns
- Better communication with the humanitarian community as a result of actor consolidation

Losses

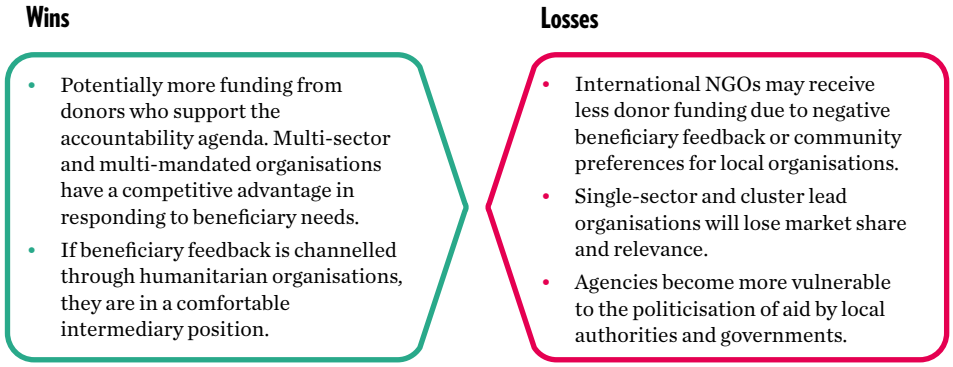
- Local governments will likely oppose the introduction of representative systems by outsiders and may feel sidelined.
- As affected communities become empowered, they may demand their local governments to be more accountable and inclusive.

Multi-sector organisations:
Power ★★★
Self-interest +

Single-sector organisations:
Power ★★★
Self-interest –

Humanitarian organisations have strong power to promote or hinder reform because its implementation hinges on them. Single-sector and single-mandated organisations in particular, as well as cluster lead organisations, are expected to lose from the reform.

Illustration VI: Key wins and losses for humanitarian organisations



The constellation of interests shows why real (as opposed to rhetorical) commitment to the accountability reform remains patchy. All powerful stakeholders would have to accept important losses related to their interests, while those with a strong interest in implementation – the affected population, local NGOs, humanitarian workers and global accountability initiatives – have limited power to do so. Nevertheless, individual actors may be more driven by their normative or political commitment, and push for the implementation of the reform. Importantly, the interests and incentives of important stakeholders related to accountability can vary strongly between contexts. Accordingly, any effort to promote the accountability reform needs to be context-specific.

IV. Protection Advocacy as a Collective Humanitarian Responsibility

If humanitarian actors prioritised advocating for a stop to rights violations:[IV]

- The protection cluster and the office of the humanitarian coordinator would need **additional analytical capacity** to draft and implement the protection strategy.
- Protection cluster members would be **appointed to lead advocacy in a geographic area** to ensure more consistent messaging and efficiency. The lead would be selected in a context-specific way, i.e., in each case, appointing the organisation that has the best operational presence and network. International

IV Reform proposal based on IASC (2013) Statement on the Centrality of Protection in Humanitarian Action; OHCHR and UNHCR (2013) The Protection of Human Rights in Humanitarian Crises; UN (2014) "Rights Up Front" Detailed Action Plan; UNGA (2016) One humanity: shared responsibility. Report of the Secretary-General for the World Humanitarian Summit. The model focuses only on country-based mechanisms.

NGOs are more likely to become local protection advocacy leads in insecure areas, but every lead will face additional risk to staff and of expulsion.

- Once appointed, protection advocacy leads will be well-positioned to further increase the size of their assistance and specialised protection programmes, as this would strengthen their position to negotiate and advocate. Together with the high upfront investments required to establish deployment mechanisms, this will lead to **a consolidation of protection actors**.
- **Joint operating principles with a regular monitoring and enforcement mechanism** would be adopted by the humanitarian country team to ensure that all actors support and do not undermine the collective advocacy effort.

Stakeholder Self-Interests and Power to Affect the Reform

Power	★★★
Self-interest	+

Donors have strong power to implement this reform. They could influence the ongoing drafting process of the IASC policy on protection, and once a mechanism is established to appoint leads, donors can support the full implementation of the reform by financing the capacity expansion of potential leads. We expect donors to win from the protection reform.

Illustration VII: Key wins and losses for donors

Wins

- Improved protection outcomes decrease pressure on governments to act with other means.
- Clearer responsibilities make it easier to hold humanitarian actors responsible for protection.

Losses

- Risk of pushback from host governments and G77 donors, which might view stronger protection advocacy as undermining state sovereignty
- Increased funding needed for protection, despite the usual difficulties of measuring outcomes and justifying funding decisions

Power	★★★
Self-interest	–

Affected governments have great power to block the reform, as they can deny entry to individuals, retract operating licenses and, in extreme cases, intimidate or expel individuals or entire organisations. Governments in conflict-affected countries will lose from the reform.

Illustration VIII: Key wins and losses for affected governments

Wins

- Protection advocacy might bring to light information about non-compliant officers at the local level, whose actions the government genuinely disapproves of.
- A more strategic protection advocacy will make it easier for affected governments to predict the issuance of denouncing public statements and, with clever negotiation tactics, delay them.

Losses

- Host governments will face stronger pressure to comply with norms, especially when external actors are also mobilized.
- Greater threat of criminal accountability as a result of the model's strong monitoring and reporting practices

Potential leads:	
Power	★★☆
Self-interest	+
Non-leads:	
Power	★★☆
Self-interest	–

Humanitarian organisations hold medium power to promote the reform – for example, by investing in their protection advocacy capacity. Protection cluster and sub-cluster lead agencies hold strong power to obstruct the reform. Potential leads will win from the reform. On balance, we expect non-leads to be indifferent to the reform, as there is no significant change in their budgets.

Table IX: Key wins and losses for humanitarian organisations

Wins

- Bigger budget, more prestige and more-predictable funding made available for lead organisations
- Actor consolidation will cement the growth potential of lead organisations.

Losses

- High upfront investments needed to establish a roster of qualified staff that can be swiftly deployed after an appointment as lead
- More risk to staff and of expulsion, due to stronger field presence and tendency to raise contentious issues

The overall chances of the reform's full implementation are moderate. Donors and potential advocacy leads stand to win from the implementation of the reform and are thus likely to support it. They will, however, face strong opposition from host governments in conflict-affected countries. Opposition from non-lead agencies will be modest. Protection cluster and sub-cluster lead agencies have great power to obstruct the reform, but their positions are unclear.

Introduction

Objectives

The humanitarian system has undergone a series of reform initiatives. While progress has been noted in certain areas, a number of issues have been identified time and time again as critical areas in need of improvement.[1] This raises questions about the ability of the humanitarian system to reform itself and about the effectiveness of current donor efforts to promote reforms.

Therefore, the UK Department for International Development (DFID) commissioned the Global Public Policy Institute (GPPi) to conduct a political economy analysis of the drivers and inhibitors of change in the humanitarian system. This study seeks to enhance our understanding of why different stakeholder groups do or do not actively promote the implementation of reforms. It also seeks to develop ideas for how stakeholder interests and incentives can be better taken into account when designing reforms and strategies for supporting their rollout.

Approach

Rather than analysing the humanitarian system as a whole, this study focuses on several specific areas of reform. The research team chose this approach based on the assumption that the various reform efforts affect the interests of key stakeholder groups in different ways. The research team expected an analysis of individual reform efforts to produce insights of greater detail.

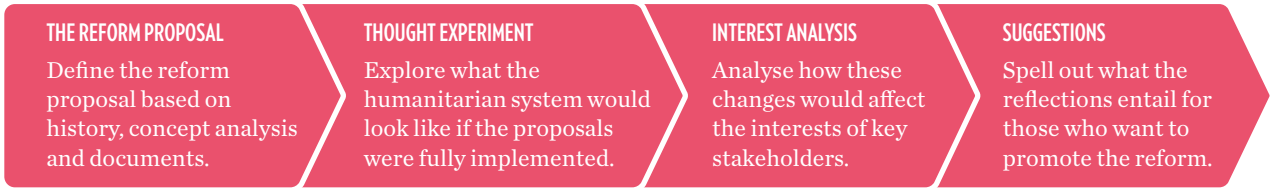
In consultation with DFID, the research team chose three issue areas for closer enquiry: the adoption of cash-based programmes as the default mode of humanitarian assistance; accountability to affected populations; and attempts to elevate protection advocacy to a collective humanitarian responsibility. The study's thematic focus was chosen in order to cover areas that are broadly considered relevant for the effectiveness and quality of the humanitarian response; that lend themselves to a political economy analysis; that feature both more and less successful cases of reform; that have a comparatively good evidence base; and that can be analysed within the given time and budget constraints.

1 Relevant analysis was provided, for example, in the 2005 Humanitarian Response Review; the documents relating to the 2005 Humanitarian Reform agenda; the inter-agency evaluations of major humanitarian responses; the documents relating to the 2011 Transformative Agenda; Inter-Agency Operational Peer Reviews; and the series of State of the Humanitarian System Reviews.

Methods

For each of the three reform areas, we use the same four-step approach (see Illustration 1). Following a brief analysis of the origins and current status of the reform process in a given area, we formulate a statement of what exactly the reform proposal is. We then develop a thought experiment to explore what the humanitarian system would look like if the proposal were fully implemented. This provides the basis for exploring how these hypothetical changes would affect the interests of important stakeholder groups. Finally, we lay out the policy implications of our reflections for donors. At the end of the report, we analyse the patterns and trends shared by all three reform areas.

Illustration 1: Analytical steps for each reform area



1. Cash Transfers as the Default Mode of Humanitarian Assistance

Cash-Based Emergency Response Has a Long History

There is a long history of assisting people affected by humanitarian crises with cash. As early as the Franco-Prussian War of 1870–1871, the International Committee of the Red Cross (ICRC) was providing financial relief to victims of conflict.[2] Documented experiments in cash-based relief interventions began in the mid-1980s, when a few isolated actors like the United Nations Children's Fund (UNICEF) and Oxfam set up pilot programmes to explore the potential of cash. Since then, aid agencies have been using the following types of cash-based programmes:[3]

- **Vouchers vs. cash:** Vouchers (both paper and electronic vouchers) can be exchanged for specific, pre-determined goods at a select number of traders or shops by beneficiaries. Cash, by contrast, can be freely used for any type of goods or services offered by any kind of vendor.
- **Conditional vs. unconditional transfers:** Under conditional cash-based programmes, beneficiaries receive their vouchers or the cash only after fulfilling certain requirements – for example, in exchange for work or for enrolling their children in school. Unconditional transfers do not require beneficiaries to take any actions or meet any conditions.
- **Restricted vs. multi-purpose:** Vouchers are restricted by definition, as they can only be used to purchase a set of pre-determined items. Aid agencies have also sought to restrict the use of cash – for example, giving people cash to buy food or shelter materials. Multi-purpose cash grants, by contrast, allow beneficiaries to freely choose what they want to use their cash grants for.

Experiences with cash-based programmes to date have produced a strong evidence base for their benefits. A recent review of the available evidence on cash transfers, conducted

2 ICRC (1998) The Franco-Prussian war, https://www.icrc.org/eng/resources/documents/misc/57jnvw.htm.

3 NORAD (2011) We Accept Cash: Mapping Study on the Use of Cash Transfers in Humanitarian, Recovery and Transitional Response.

for the High Level Panel on Humanitarian Cash Transfers,[4] analysed over 200 evaluations and in-depth studies. According to the panel report, "the evidence suggests that, in many contexts, cash is a better way to help people and stimulate markets, and represents value for money compared to in-kind alternatives"[5] because cash transfers support local markets, offer greater choice and dignity to aid recipients, and are more cost-effective. Meanwhile, the evidence did not validate the usual concerns about cash transfers, such as that they might cause inflation in local markets, be more prone to abuse and corruption, be spent irresponsibly and disadvantage women.

Additional support came from the development sector, where actors had already been experimenting with conditional and unconditional cash grants for several decades. This offered humanitarian actors concrete examples of cash-based programmes that could be applied to emergency settings.[6] The development sector also provided humanitarian actors further evidence of the benefits of cash-based programmes. Evaluations of large social assistance programmes in countries such as Mexico, Brazil, Ethiopia and Kenya concluded that cash transfers can be a useful and appropriate part of poverty alleviation strategies.

Nevertheless, the scale of cash-based humanitarian responses long remained marginal compared to that of traditional in-kind assistance. This changed with the response to the 2004 Indian Ocean tsunami. The magnitude and visibility of the crisis prompted a major injection of resources and the pressure to spend these resources rapidly.[7] The local market remained mostly unaffected, enabling many aid agencies to implement larger cash programmes for the first time. Such favourable conditions for cash-based assistance later recurred during a series of large-scale disasters: the 2010 Haiti earthquake, the 2011 famine in Somalia and the ongoing crisis in Syria. During this period, humanitarian organisations also began using digital payment systems: cash cards or money transfers via mobile phones. This made cash transfers safer and more efficient, and increased the involvement of banks, mobile phone companies and existing national social protection programmes based on cash.[8]

To enable the increasing use of cash and to position themselves as key actors in the emerging system of cash assistance, large UN agencies such as the Office of the United Nations High Commissioner for Refugees (UNHCR) and the World Food Programme (WFP) as well as NGOs and other actors began investing more strategically into building the organisational structures and human resources required for cash programming. NGOs and donors invested in networks and institutions for inter-agency learning and capacity building, including the Cash Learning Partnership (CaLP), the Electronic Cash Transfer Learning Action Network (ELAN) and the Cash and Markets Capacity Building Roster (CashCap).

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4 Bailey, S. and Harvey, P. (2015) State of Evidence on Humanitarian Cash Transfers. Background Note for the High Level Panel on Humanitarian Cash Transfers.

5 High Level Panel on Humanitarian Cash Transfers (2015) Doing Cash Differently, p. 18.

6 GHA (2012) Tracking Spending on Cash Transfer Programming in a Humanitarian Context.

7 Bessant, J. (2015) Case Study: Cash-Based Programming (CBP) in the Food Assistance Sector, http://r4d.dfid.gov.uk/pdf/outputs/Hum_Response/Cash-based-programming-in-the-food-assistance-sector_Case-study-MIHIS-project-FINAL.pdf.

8 In 2009, Concern Worldwide was the first NGO to use mobile phone technology for emergency cash transfers in Kenya. See ALNAP Innovations (2009) Case Study: Cash Transfers through Mobile Phones. An Innovative Emergency Response in Kenya, http://www.alnap.org/resource/5763. WFP entered a multi-year partnership with MasterCard in 2012 to provide e-vouchers for food in Lebanon.

Many donors were initially reluctant to endorse cash-based programmes,[9] but they have become gradually more supportive over the past five years. European donors in particular are now seen as active promoters of cash-based programming.[10] DFID recently emerged as a strong advocate of cash-based emergency interventions, building on its earlier support for cash transfers in development contexts. The European Commission's Humanitarian Aid and Civil Protection Department (DG ECHO) had long capped its funding for unconditional cash grants at €100,000 per project. It removed this cap in 2013 after an extensive evaluation of cash and voucher projects.[11] While DG ECHO has not taken a stance in favour of cash as the default delivery modality,[12] it actively supports capacity building and the development of technical guidance materials.[13] The United States Agency for International Development's (USAID) Food for Peace programme was long considered an obstacle to scaling up cash transfers because it tied its contributions to in-kind food aid from US producers.[14] Through its creation of additional, more-flexible budget lines, however, USAID has become an important funder of voucher programmes and local procurement in particular.[15]

Despite Clear Increase in Cash Programming, It Remains Only a Small Part of Humanitarian Portfolio

The High Level Panel on Humanitarian Cash Transfers estimates the current share of cash and voucher programming to be around 6 percent of total humanitarian spending, or around US$1.2 billion in 2014. Although this increase is significant compared to less than 1 percent in 2004, it remains only a small part of the total portfolio.

It also remains unclear what part of this 6 percent concerns vouchers and restricted cash grants, as opposed to unrestricted, "multi-purpose" cash transfers.[16] Anecdotal evidence suggests that organisations may have given preference to vouchers or "single-purpose" cash over multi-purpose cash transfers, resulting in fragmented delivery systems. In 2014, for example, 30 aid agencies in Lebanon provided cash, e-vouchers and paper vouchers with 14 different sector-specific objectives and

9 Not all donors were supportive, for example, when WFP's executive board formally adopted cash and vouchers as a response modality in 2008. See Bessant, J. (2015) Case Study: Cash-Based Programming (CBP) in the Food Assistance Sector.

10 CALP (2015) A Review of Cash Transfer Programming and the Cash Learning Partnership: 2005-2015 and Beyond.

11 DG ECHO (2008) Evaluation and Review of the Use of Cash and Vouchers in Humanitarian Crises, http://ec.europa.eu/echo/files/evaluation/2008/cash_evaluation_report.pdf.

12 DG ECHO (2013) The Use of Cash and Vouchers in Humanitarian Crises - DG ECHO Funding Guidelines, http://ec.europa.eu/echo/files/policies/sectoral/ECHO_Cash_Vouchers_Guidelines.pdf.

13 Including, for example, UNHCR et al. (2015) Operational Guidance and Toolkit for Multipurpose Cash Grants.

14 Bailey, S. and Harvey, P. (2015) Humanitarian Cash Transfers Consultation Summary: Background Note for the High Level Panel on Cash Transfers.

15 In fact, a recent call for proposals regarding the Yemen response indicated a clear preference for vouchers. See CALP (2015) Review of Cash Transfer Programming and the Cash Learning Partnership: 2005-2015 and Beyond.

16 As noted by the panel, hard figures on the exact scale and type of cash-based programmes are currently unavailable because humanitarian financial tracking does not clearly distinguish between unconditional cash transfers, conditional transfers, vouchers and in-kind aid.

operating procedures.[17] Lumping together various forms of cash-based assistance allows aid organisations to formally back the aim of scaling up cash, while choosing the type of cash-based programme that best protects their own organisational interests. As a result, the specific benefits of multi-purpose cash transfers are lost. This is a common phenomenon in world politics that is often described as "organised hypocrisy".[18]

Finally, the burden of proof is still against cash. In-kind assistance remains the default mode for humanitarian assistance. When aid agencies want to set up cash-based programmes, they usually need to first present their management and donors with thorough evidence that the market conditions are right. This creates a bias in favour of in-kind interventions, at the expense of cash-based interventions.

In sum, the current scale and main modalities of cash-based programming can still largely be accommodated within the existing structures of the humanitarian system and the mandates of central humanitarian organisations.

Global Reform Demands for Humanitarian Cash Transfers Were Only Recently Articulated

As described in the previous section, there initially had not been a central push for cash-based programming, unlike the other reform areas examined in this paper. Instead, cash-based programmes were introduced in a decentralised, bottom-up fashion. Efforts at the global level focused on providing technical guidance and capacity support regarding the implementation of cash-based programmes, but did not formulate any clear reform goals until recently.

Currently, there is no "authoritative" reform demand regarding cash transfers: the Inter-Agency Standing Committee (IASC) has not declared a position on the desirable level of cash-based programming or on the coordination of cash-based programming at country level. The global cash working group only recently started to become more formalised. The clearest reform proposal was issued by the High Level Panel on Humanitarian Cash Transfers, a group of 15 independent individuals that met over the course of 2015, based on an initiative of DFID and the Overseas Development Institute (ODI). It involved representatives of a broad range of key stakeholders, either as panel members or through consultations. The panel issued a report with recommendations for the future of cash-based programming. Based on these recommendations and other strategic and guidance documents (the report of the High-Level Panel on Humanitarian Financing, the summary of consultations for the World Humanitarian Summit and guidance documents by different organisations), we consider the following to be the core reform demands on the table today, even if some of them are subject to intense political debate:

17 Cabon Venton, C. et al. (2015) Value for Money of Cash Transfers in Emergencies, http://www.cashlearning.org/downloads/summary-vfm-cash-in-emergencies-report-final.pdf.

18 See Brunsson, N. (1989) The Organization of Hypocrisy: Talk, Decisions and Actions in Organizations; Krasner, S. D. (1999) Sovereignty: Organized Hypocrisy; Lipson, M. (2006) Organized Hypocrisy and Global Governance: Implications for UN Reform.

1. **Level:** Cash-based programming should be considered the default delivery modality.[19]
2. **Type:** Unless special circumstances dictate otherwise, cash-based programmes should provide beneficiaries with unrestricted, so-called "multi-purpose" cash grants (rather than, e.g., vouchers).[20]
3. **Sectors:** Cash-based programming should be strongly considered for all household needs that can be met through cash transactions. This includes commodity transfers (e.g., food, shelter materials, agricultural inputs, water, medicine) and services for which a functioning market exists (this can include education and health, depending on the context). Cash-based programmes should not be used to provide services for which no private market exists, indirect humanitarian services and public goods (e.g., protection and security, sanitation, coordination, "software" components of humanitarian programmes).[21]
4. **Contexts:** In principle, all humanitarian contexts – natural disasters or conflicts, short-term or protracted – should be eligible for cash-based programming. In-kind deliveries may be necessary where markets are not functioning, where

19 The report of the High Level Panel on Humanitarian Cash Transfers explicitly requests this. The report's first recommendation is to always ask "why not cash?" and "if not now, when?" The consultations for the World Humanitarian Summit reached a similar conclusion, and its synthesis report suggests "[scaling] up the use of cash transfers" and "making cash the default mechanism for the provision of humanitarian relief" (World Humanitarian Summit secretariat, 2015). The report of the High-Level Panel on Humanitarian Financing is not as explicit, but it recommends that cash-based responses be "rapidly scaled-up" and considers the benefits of a "radical shift". Previous policy documents such as the European Commission's guidance on the use of cash and vouchers in humanitarian crises (2013) were more cautious, arguing for a shift from in-kind assistance as the default, to an equal, evidence-based consideration of all modalities. Individual agencies have also not expressed such clear preferences for cash as the default. For example, the recent operational guidance and toolkit for multi-purpose cash grants (2015) formulated by UNHCR, together with other agencies, only sees "significant scope for increasing multipurpose cash grants". WFP's 2008 policy on vouchers and cash transfers as food assistance instruments also stipulates that assessments determine the most appropriate aid modality for each case.

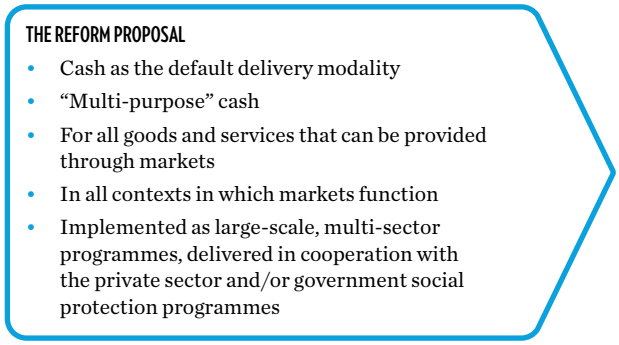
20 The cash panel report demands that "wherever possible unconditional cash transfers should be provided". The humanitarian financing panel report endorses this and demands the rapid scale-up of unconditional cash programmes. The synthesis report of the World Humanitarian Summit consultations does not explicitly address the question, but it demands that "the use of cash transfers" (a term for unconditional, multi-purpose cash transfers) be scaled up, and it does not use other commonly used concepts, such as "cash and vouchers" or the more inclusive term "cash-based programming". The International Red Cross and Red Crescent Movement already demanded in its 2007 guidelines for cash transfer programming that unconditional cash transfers be the default option in cash and voucher programming.

21 None of the current policy and guidance documents includes a complete list of the humanitarian goods and services that should be considered for cash-based programming. The report of the High Level Panel on Humanitarian Cash Transfers only names exceptions to the use of cash: "Cash can and should be complemented by efforts to supply goods that the market will not provide effectively, including public goods such as security and public health. Cash transfers can also be complemented by technical assistance, for instance in building earthquake- or flood-resistant homes." The report also states that cash is often "less appropriate" in health, water and sanitation, and "not appropriate at all" in mine action, coordination and security, thereby implying that it is appropriate in all other sectors. UNHCR's 2015 guidance and toolkit suggests that analysis to determine the best delivery modality is often used for food, shelter and non-food items, and increasingly in WASH. The UNHCR document also suggests that cash can be used in health, education and "other sectors". The World Humanitarian Summit consultation synthesis finds that cash programming does not apply to public goods, such as "protection, sanitation and health". The report of the High-Level Panel on Humanitarian Financing names "food, tents, water and medicine" as examples of in-kind assistance that can be replaced by cash.

governments object to cash programmes or where cash programmes entail greater risk for beneficiaries than in-kind deliveries. These exceptions, however, should be time-bound.[22]

5. **Implementation:** Unrestricted, multi-purpose cash transfer programmes should adopt a multi-sector approach and should be delivered as large-scale programmes (rather than many organisations delivering small programmes in parallel).[23] Private sector partners and/or national social protection programmes should remain involved in facilitating the technical delivery of cash.

Illustration 2: The reform proposal for the shift to cash



Thought Experiment: What If the Shift to Cash Were Fully Implemented?

What do these reform suggestions mean? How do they affect the interests and incentives of key stakeholders? To explore these questions, we will perform a thought experiment. In the experiment, we assume that all reform suggestions are fully implemented and try to predict what the humanitarian system will look like under these conditions. This will provide the basis for analysing how the proposed changes are likely to affect the interests and incentives of key stakeholders, and what could be done to support the proposed reform in the face of general resistance from organisations and systems.

We assume that full implementation of the reform suggestions would mean the following:

22 Based on an analysis of over 200 cash-related evaluations and studies, the cash panel report concludes that "in most contexts, humanitarian cash transfers can be provided to people safely, efficiently and accountably" and requests organisations to ask "if not now, when?" UNHCR's 2015 guidance and toolkit states that multi-purpose cash grants "can be used regardless of context", depending on the situation and response analysis. Similarly, the European Commission's 2013 cash and voucher guidelines emphasise the importance of market and context analysis. The synthesis of the World Humanitarian Summit consultations concludes that cash programmes should not be used "where markets are not functioning".

23 The cash panel report makes this recommendation explicitly. UNHCR's 2015 guidance and toolkit also states that multi-purpose cash grants require multi-sector approaches. The humanitarian financing panel report suggests that the real potential for cost-efficiency gains may lie in "a radical shift towards harmonised, large-scale, cash-based response" and demands stronger coordination that results in the use of the same transfer modality by different parties.

1. In principle, cash transfers are suitable for most humanitarian contexts. The main exceptions are countries in which governments object to large-scale cash transfers, conflict zones or remote locations that are systematically cut off from markets and areas where the technical transfer of cash would be too costly or risky. Current or recent examples of such exceptions include besieged areas within Syria; remote areas cut off from transport networks in South Sudan (e.g., during the rainy season); areas cut off from markets following the earthquake in Nepal; and areas with severe movement restrictions during the Ebola crisis. These examples show that in most emergencies, only specific pockets are unsuitable for cash programming and that government resistance to cash programming remains rare. Based on the current picture, we expect that **the broad majority, or between 70 and 80 percent of all humanitarian contexts, will be eligible for cash transfers** (of course, the nature of emergencies and the number of governments objecting to cash-based programming might change).
2. In areas where cash transfers are suitable in principle, cash-based programming would be adopted to different degrees by different sectors:

Table 1: Assumptions regarding suitability of different sectors for cash

Sector	Reasoning	Share as cash (approx.)
Food	Cash for general food distributions In-kind for targeted nutrition programmes Cash to schools for school feeding	90%
Shelter & non-food items	Cash for shelter materials with good market availability Cash for all non-food items In-kind for unusually scarce items and normative aspects of programming	70%
Agriculture	Cash for agricultural inputs In-kind for trainings	70%
Recovery & infra-structure	Cash for asset rehabilitation Cash for work programmes In-kind for complex infrastructure	70%
WASH	Cash for water delivery In-kind for sanitation In-kind for hygiene education	40%
Health	Cash for using private health facilities (where they exist) Cash for medicines In-kind for supporting public health facilities	30%
Education	Cash for school fees/private education systems (where they exist) In-kind for public education systems	30%
Protection Mine action Staff safety Coordination & support		0%

3. Based on the current allocation of humanitarian funding across sectors,[24] this means that **37 to 42 percent of the total humanitarian budget would be allocated to cash-based programmes**[25] – mainly to unrestricted cash transfers and only in exceptions to vouchers. In a context deemed suitable for cash programming in principle, just over 50 percent of the total budget would be allocated to cash-based programming. In 2014, which saw record contributions, this would have meant a total budget of between $8.6 and $9.8 billion for cash-based programmes, or around $100 per targeted beneficiary.[26] Should the overall humanitarian budget increase to $50 billion per year by 2030,[27] the total budget for cash-based programmes would be between $18.5 and $21 billion.
4. Most cash-based programmes would be implemented as large-scale, multi-sector programmes. This implies a **consolidation of actors**. While the current political debate focuses on how cash programmes should be coordinated (whether through clusters or through an inter-sector forum), the reform proposals suggest a more radical shift to large-scale programmes, which would see one or a very small number of organisations or consortia responsible for cash programmes in any given area. One option for achieving this would be to appoint a single organisation with a mandate for cash transfers in all crisis situations. However, the political process to reach such a decision would likely be long and highly controversial, and the necessary initial investments into the agency would be high. With that in mind, a second option is more likely. In this scenario, no single organisation would receive a mandate for cash transfers. Instead, donors would award their large-scale cash transfer contracts to the organisation or consortium best placed to implement the programme in any given area. This approach would require much stronger donor coordination – for example, through an independently managed pooled fund for cash transfers or an explicit area-based division of labour. Under this scenario, WFP, UNHCR, various international NGOs or NGO consortia, and development actors such as the World Bank are likely to implement large-scale cash programmes in different countries and regions. These organisations or consortia would be responsible for the technical implementation and monitoring of the cash-based programme. Complementary non-cash programming to supply in-kind goods and services across various sectors could be implemented by the same or other organisations. With over 50 percent of the budget allocated through a large-scale cash programme to a humanitarian context deemed suitable for cash and thus one organisation or consortium, we would expect the total number of organisations operating in the emergency to decrease, even if organisations formerly specialised in delivering in-kind programmes reoriented their work.

24 As recorded by the Financial Tracking Service.

25 This is based on a calculation of what the share of cash programming would have been under this model over the past three years. It uses 2013–2015 funding data, as reported by the Financial Tracking Service (accessed January 2016). For those budget lines where the sector is unspecified, the average share of funding for cash-based programmes across the defined sectors was used. The low estimate assumes that cash-based programmes are suitable only in 70 percent of all contexts; the high estimate assumes that 80 percent of all contexts are suitable.

26 This calculation assumes that programming costs are around 30 percent, so that for each dollar invested in cash-based programming, beneficiaries would receive $0.70.

27 The estimate of $50 billion by 2030 was made by the High-Level Panel on Humanitarian Financing, based on Financial Tracking Service and internal UN OCHA data.

5. **Implementing non-cash programmes would become more expensive.** This would be true in relative terms, as it is comparatively cheaper to deliver cash than in-kind assistance.[28] It would also be true in absolute terms, since there would be fewer economies of scale for in-kind programmes, and most organisations would need to finance their presence and technical expertise through the budgets remaining for non-cash aid. In an environment where the gap between needs and available financial resources will likely continue to widen, this could easily lead to a lack of funding for non-cash programmes, especially since the shift to cash would likely lead to greater transparency concerning programming costs. Remote, rural areas with little access to functioning markets are likely to suffer from this effect. This also applies to the "software" and "public good" components of humanitarian assistance (e.g., shelter standards, hygiene and nutrition education, protection). However, less donor support for the non-cash components of humanitarian programming is not automatic. Donors could consciously support these less cost-efficient components of humanitarian aid and thereby mitigate the risk of crowding out non-cash programmes.
6. In addition, many humanitarian organisations report that their ability to deliver tangible assistance is often crucial to gaining the acceptance they need in order to deliver the less tangible aspects of their work that local actors might resist – for example, protection activities, gender empowerment and other normative interventions. Therefore, it is plausible that it would become **more difficult for most organisations to gain the necessary access for delivering normative components of their assistance** (except for the few organisations that become responsible for delivering cash).
7. **The relevance of sectors as an organising principle for humanitarian assistance would decrease.** Cash-based programmes would be implemented as large-scale, multi-sector programmes. Therefore, it would be difficult to ascribe them to any single cluster or to account for their results in terms of sector-specific outputs or outcomes. Inter-sectoral needs assessment and planning mechanisms, as well as organisations with multi-sector mandates and capacities, are thus likely to gain prominence in the system. At the same time, particularly those sectors that are highly amenable to the use of cash (food, shelter and non-food items; agriculture; and recovery) would lose relevance, unless they reinvent themselves as a cash sector.
8. **Non-traditional humanitarian actors would play a more important role.** While humanitarian organisations would remain responsible for needs assessments, targeting and monitoring, they will most likely rely on other actors for the technical delivery of cash. Where national social protection programmes providing cash transfers exist, they are likely to be used in emergency situations if the populations they target have a significant overlap with humanitarian target groups. Where new systems need to be created, humanitarian organisations

28 See Cabon Venton, C. et al. (2015) Value for Money of Cash Transfers in Emergencies. The study presents clear evidence that delivering cash is about 25 to 30 percent cheaper than delivering in-kind assistance, even under the fragmented setup of today. The cost-efficiency of cash is likely to increase as programmes grow larger in scale. But the authors caution that overall efficiency depends on factors other than delivery costs, such as international and local commodity processes. The study thus concludes, "No transfer modality – cash, vouchers or in-kind aid – is universally more efficient than another."

are likely to rely on the expertise and ability of banks and telecommunications companies to implement cash transfers. Through the provision of cash to crisis-affected people, markets for local and international businesses in crisis settings would expand. This would provide new opportunities for private sector providers of relevant goods and services.

Illustration 3: Full implementation of the shift to cash

THE REFORM PROPOSAL FULLY IMPLEMENTED

- ~40% of total humanitarian budget for cash
- Consolidation of actors
- More-expensive non-cash programmes and greater transparency concerning costs
- More difficult access for normative programmes
- Reduced relevance of sectors/clusters
- Increased role of private sector and government social protection programmes

Stakeholder Self-Interests and Power to Affect the Reform

Like all of the reform efforts discussed in this study, the cash reform was suggested because it is assumed to result in better assistance to people affected by crises. But it is important to note that the reform effort also affects the organisational self-interests of donors, recipient governments and operational organisations. This section explores the effects of the reform on the organisational self-interests of key stakeholders. It summarises which stakeholder groups are expected to "win" and which are expected to "lose" through the reform's implementation, and examines the power they have to promote or obstruct the reform.

It is important to keep two aspects in mind when reading this analysis. First, "no change" is always easier than "change". It will require a lot of effort for any reform initiative to overcome the inertia of the humanitarian system. Second, self-interests do not automatically determine the position taken by an organisation. Even if an organisation is set to "lose" through a reform, its normative commitment to the reform can be so strong, that it nonetheless actively supports the reform effort.

Donors

Past role: To date, the shift to cash-based programming has not been a donor-driven reform effort. Most donors have not had any explicit policies on cash, at least not until recently. While some of their in-country representatives have been ready to support specific cash programmes, they were often concerned about the potential risks of cash programmes and reluctant to support cash programming at scale. DG ECHO, for example, had a relatively low ceiling in place for cash grants. USAID had historically tied

many of its contributions to in-kind food aid and only recently created an additional funding line that is much more flexible. DFID has been a strong supporter of cash-based social protection programmes in development contexts for a longer time, but its active advocacy role in the shift to cash in humanitarian response is recent.

Power to affect the reform: Donors hold a very high degree of power over the proposed shift to cash transfers as the default mode of humanitarian assistance. Even an important donor agency acting on its own could decide to allocate its funding in specific contexts to large-scale, multi-sector cash programmes. The effect would be greater with more donors backing the shift. Implementing organisations opposing this move would be very unlikely to jointly agree on not accepting these contracts because the collective action problems they face are too high. This is especially the case because there is the credible threat of donors bypassing humanitarian agencies and instead awarding contracts for cash programmes to qualified third parties, such as the World Bank.

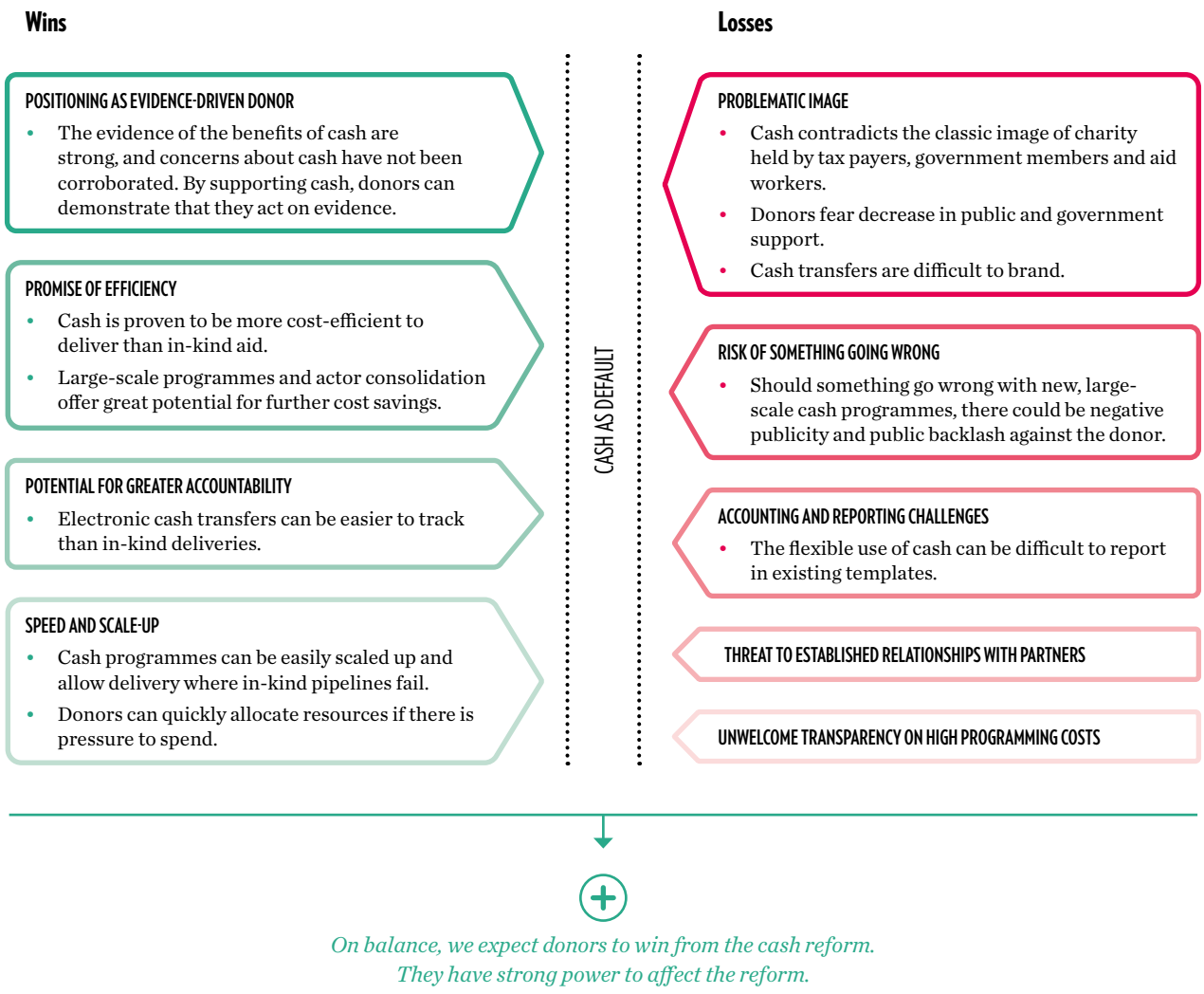
Donor power is limited first and foremost by the information asymmetry between donors and implementers. To date, market assessments have been conducted by operational organisations. As a result, assessments are often geared towards the options that are available and desirable for the organisation in question. Donors would need access to independent assessments to question or challenge assessment results. In addition, donor agencies typically have limited influence on the allocation of assessed contributions to UN agencies and on their government's general commitment to support multilateral agencies' funding requests.

Self-interests: Overall, donors are expected to win from the cash reform. They would gain from positioning themselves as evidence-driven supporters of the reform effort. They would benefit from potential cost savings and greater accountability as well as the improved ability to scale up their support and disburse pledged contributions in difficult operating contexts.

Donors might lose from the reform effort due to the negative image of cash transfers; the potential of something going wrong; accountability and reporting challenges; and possible threats to established relationships between donors and partners. For some, the expected transparency concerning programming costs may be unwelcome, as overheads tend to be high, and this could reflect poorly on political support for humanitarian assistance.

Illustration 4 provides an overview of wins and losses for donors.

Illustration 4: Wins and losses for donors



On balance, we expect donors to win from the cash reform. They have strong power to affect the reform.

Governments of Crisis-Affected Countries

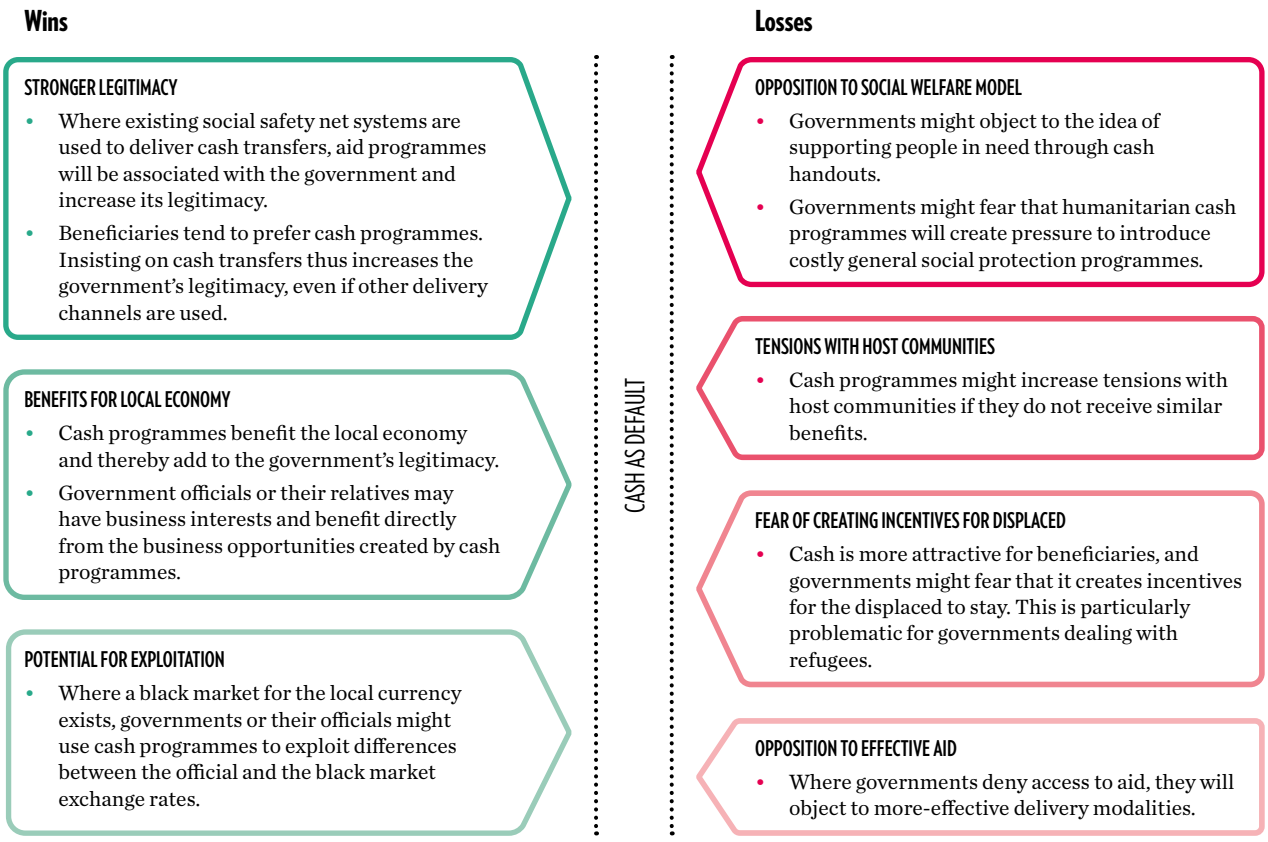
Past role: To date, governments of crisis-affected countries have played a limited but highly heterogeneous role in the introduction of humanitarian cash programmes. In most of the smaller-scale cash pilots, governments have not taken a specific, known stance; rather, they have left the decision concerning the most appropriate delivery modality to aid agencies. There are some known cases, however, in which the government has been an active proponent of and collaborator in cash programmes. In the Philippines, for example, the government was keen to facilitate effective aid following natural disasters, preparedness efforts were comparatively strong, and national social protection programmes could be used to implement cash programmes. There are known examples of the opposite stance as well. In South Sudan, for instance, the government has created obstacles for effective aid to opposition areas, and negotiations with the government about the introduction of cash programming have been very lengthy. In Nepal, the government was concerned that unconditional cash transfers could create dependence and would be unsustainable in the long run.

Power to affect the reform: Affected governments hold a high degree of power over the suggested move to large-scale cash programming. They can both request the use of cash transfers and prohibit or delay such transfers through regulation. As the volume of cash transfer programmes increases, they are likely to define their positions more actively.

Self-interests: Whether affected governments win or lose from the cash reform depends on their specific situation. Governments that already have cash-based social protection programmes and that have an interest in facilitating effective humanitarian aid are expected to win from the shift. By contrast, the losses are expected to outweigh gains for governments without such social protection programmes and with an interest in hindering or manipulating aid. Losses will also be stronger for governments dealing with refugee situations.

Illustration 5 provides an overview of wins and losses for affected governments.

Illustration 5: Wins and losses for affected governments



Affected governments are likely to retain heterogeneous positions regarding the move to cash, depending on their level of concern for legitimacy and the existence of social protection programmes. Well-intentioned governments are likely to support the shift to cash.

Operational Humanitarian Organisations

When analysing how the suggested move to cash affects the interests and incentives of operational humanitarian organisations, three groups need to be differentiated from each other:

1. Organisations that have a realistic prospect of implementing or participating in the implementation of large-scale, multi-sector cash programmes;
2. Organisations that are operating in sectors amenable to cash programming (food, shelter and non-food items, agriculture, recovery and infrastructure, and, to a lesser degree, WASH, health and education), but are not in a position to lead or participate in the implementation of large-scale, multi-sector cash programmes;
3. Organisations operating in sectors that are not, or are only marginally, amenable to cash programming (protection, mine action, staff safety, coordination and support).

This section provides a separate analysis of the self-interests of the first two groups. Members of the last group are not discussed separately, since the implementation of the reform will not significantly affect their interests.

Past role: To date, operational agencies have been the driving force of the gradual, bottom-up introduction of cash-based programmes. In most cases, these programmes were first designed and implemented at country or local level. Several organisations followed suit by investing centrally into the necessary skills and processes to better enable cash-based programming. While exact statistics do not exist, there is some evidence that organisations have often opted for vouchers or so-called "single-purpose cash" (cash for food or similar), rather than unrestricted, "multi-purpose" cash.[29]

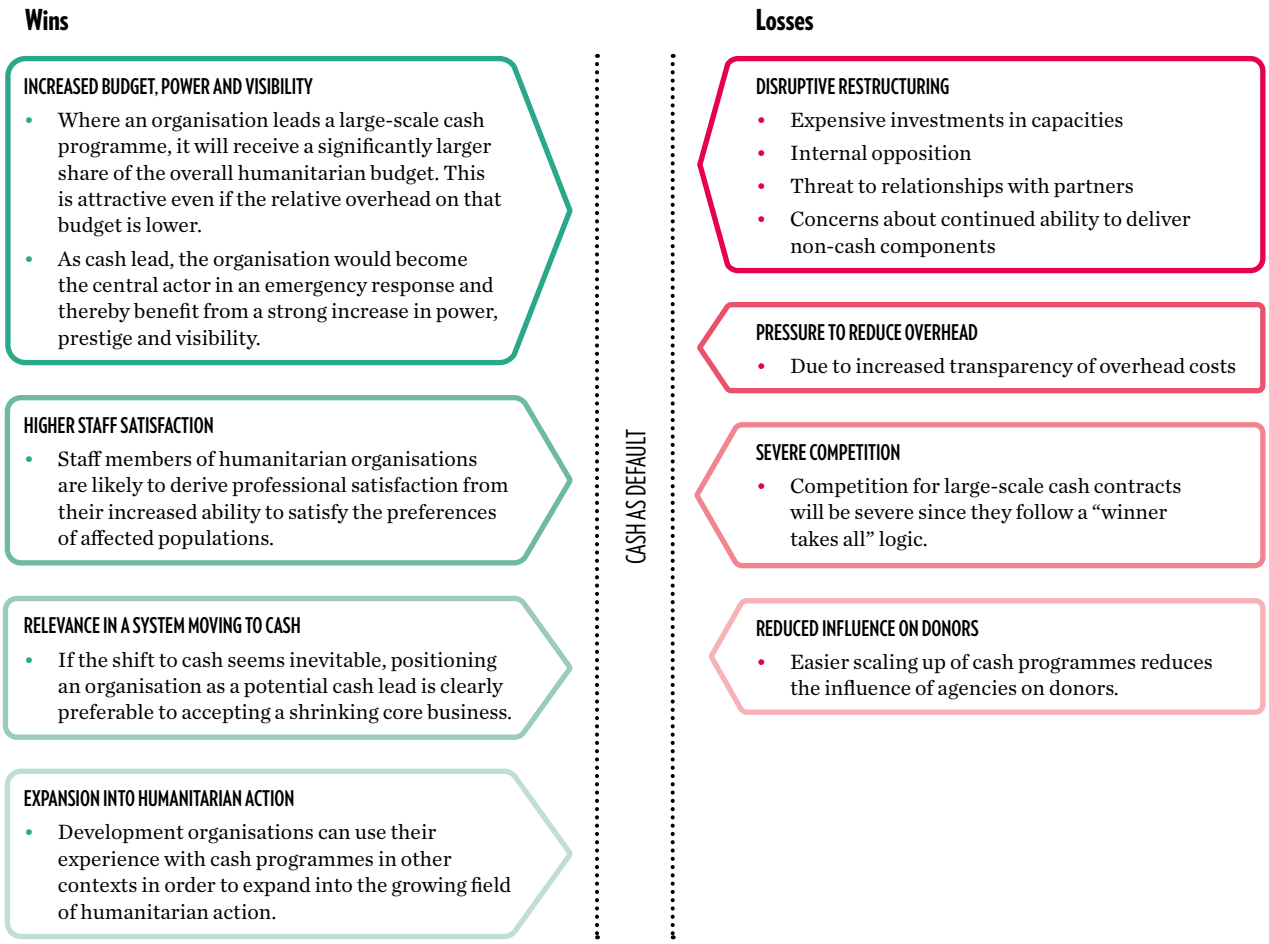
Power to affect the reform: Operational humanitarian organisations hold a medium degree of power over the suggested shift to large-scale cash programming. Should donors decide to invest their resources into large-scale cash programmes, there is not much that operational organisations can do to stop them – especially since there are development organisations with experience in cash programmes that would have strong incentives for expanding their business and mandate to also cover humanitarian cash programmes. However, the active cooperation and support of operational organisations are crucial for a smooth implementation of the reform. They need to make the necessary investments into capacities and processes for cash programmes, and constructive relationships are important for the effective delivery of non-cash programmes. Potential cash leads thus wield greater power over the reform than non-leads do.

29 Evaluations have criticised, for example, WFP, one of the largest providers of cash-based programmes, for not basing its frequent preference for vouchers over cash on solid analysis.

Self-interests: The interests of operational organisations greatly differ depending on which group they fall into. This, in turn, depends, among other factors, on how promoters of the shift to cash approach the implementation of the reform. For example, if there are attempts to task a single agency with a formal mandate for cash programmes, only that organisation would fall into Group 1, and all others into Groups 2 or 3. If reformers opt for the second option – to award contracts for cash programmes flexibly, to the organisation or group best placed in any given area – a much larger group of organisations (e.g., WFP, UNHCR, potentially UNICEF, well-capacitated NGOs or NGO consortia, the Red Cross and Red Crescent Movement, in addition to development organisations such as the World Bank) would fall into Group 1. The group of potential leads of large-scale cash programmes (Group 1) would have to accept some important losses, but they are still expected to generally win from the shift to cash, especially if the alternative is not to qualify as a potential cash lead. Under the right conditions, competition between them could result in a "race to the top". Group 2 – organisations that are working in sectors affected by the move to cash, but are unlikely to implement large-scale cash programmes – would lose from the reform. Group 3 would not be strongly affected.

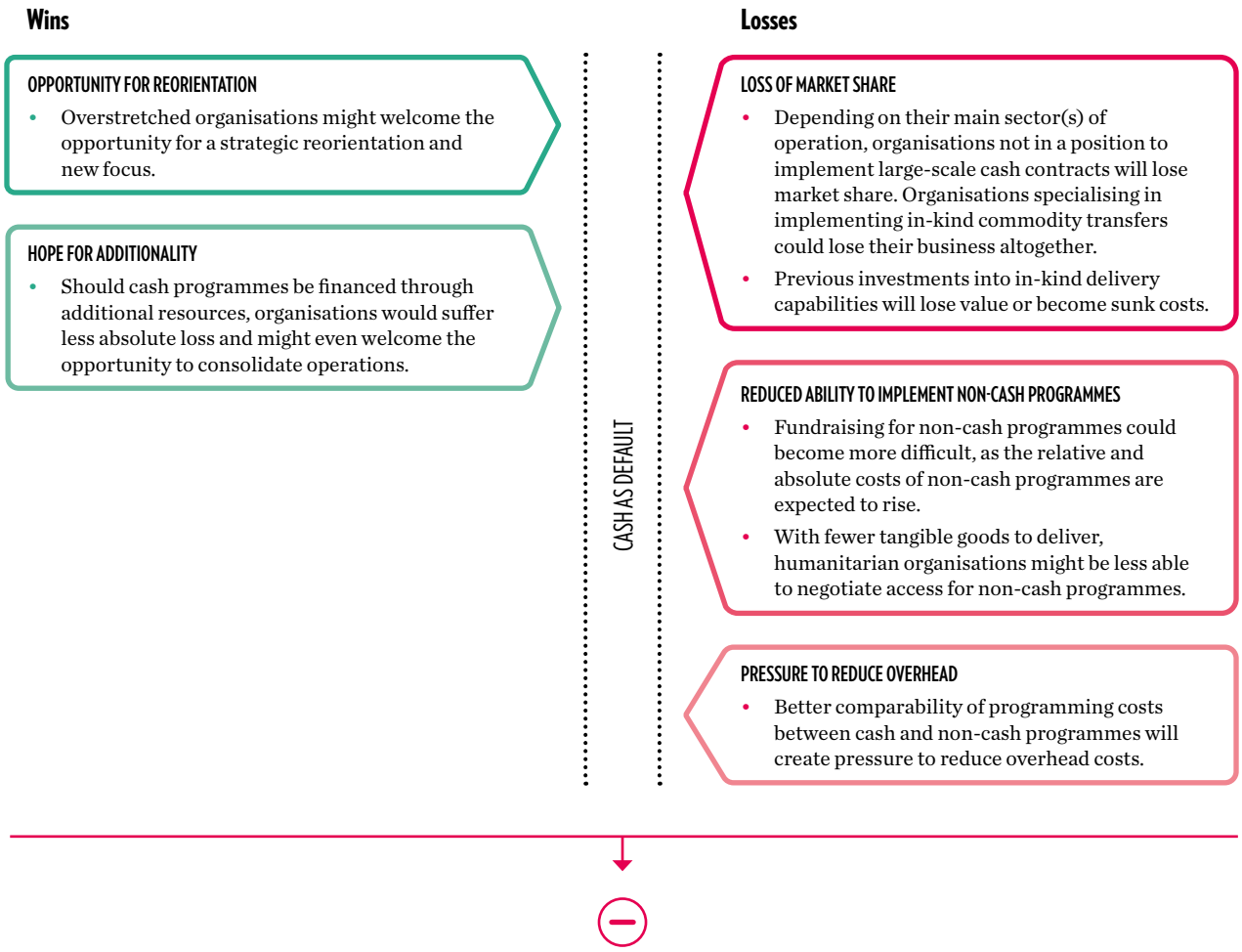
Illustration 6 provides an overview of wins and losses for potential cash lead organisations, and Illustration 7 for non-lead organisations.

Illustration 6: Wins and losses for potential cash leads



Potential cash leads face important wins and losses. Especially if the shift to cash seems inevitable, the wins are expected to outweigh the losses.
Potential cash leads hold a medium to high degree of power to affect the reform.

Illustration 7: Wins and losses for non-leads



Non-lead organisations will clearly lose from the implementation of the reform. Their power to obstruct the reform, however, is limited.

The Private Sector

Banks and telecommunications companies offering mobile money transfers are very well-positioned and possess the necessary technical capacities and expertise to facilitate the actual transfer of cash to beneficiaries – provided humanitarian organisations offer suitable models of cooperation. Private traders and businesses supply relevant goods and services, and they would benefit from the expansion of market opportunities in crisis-affected areas.

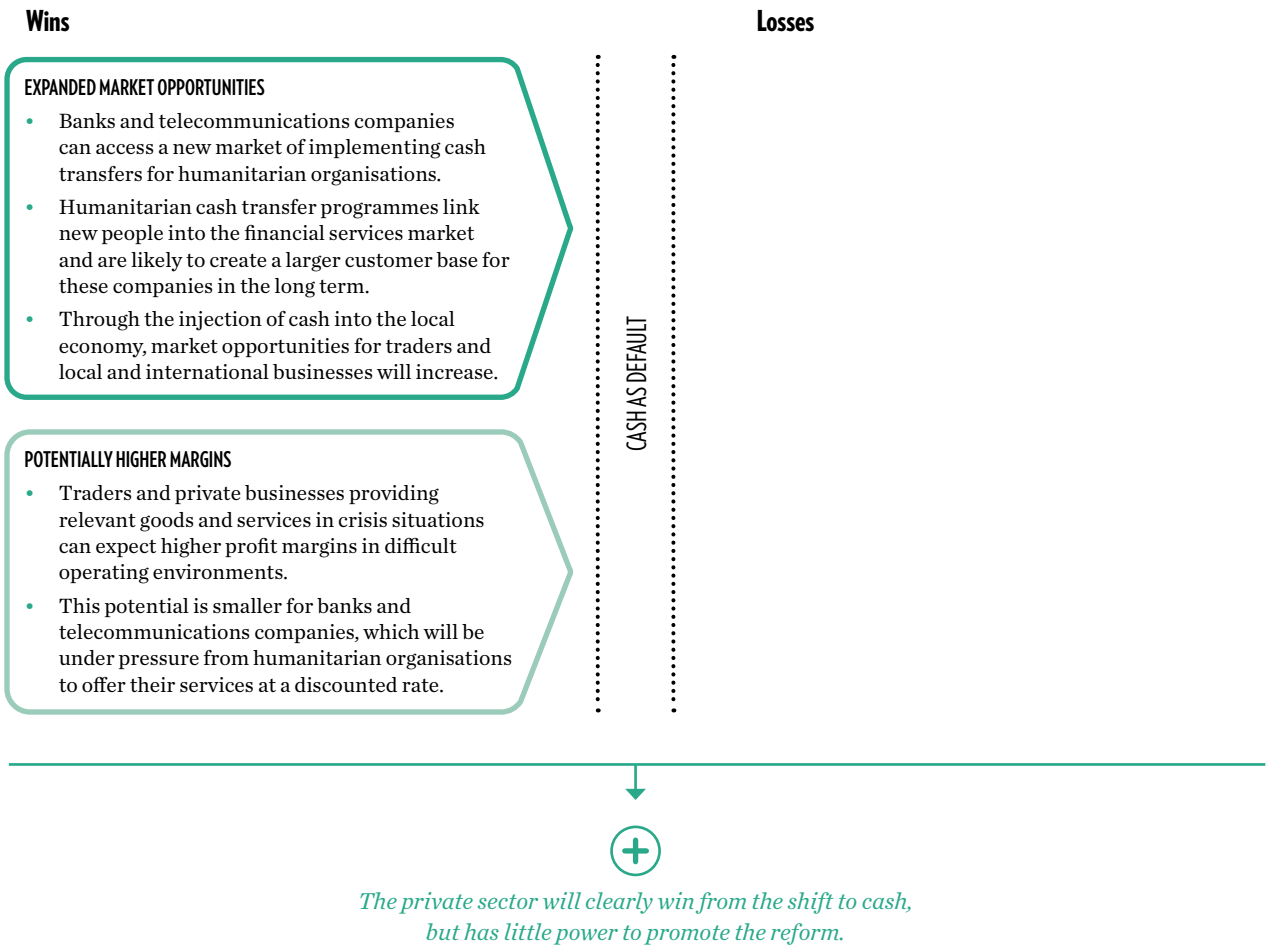
Past role: The active cooperation and engagement of private sector organisations have enabled the practical implementation of cash-based programmes in several emergency contexts.

Power to affect the reform: Private sector organisations can do little to stop the shift to cash, but their active engagement could speed up implementation of the reform. Traders and private businesses could promote the reform by lobbying their governments to insist on cash-based assistance. Banks and telecommunications companies could speed up the transition to cash by increasing their investment in cash-transfer facilities and offering favourable conditions to humanitarian organisations. Altogether, the power of the private sector to affect the reform is limited.

Self-interests: Private sector organisations are clearly winning from the reform, as it would offer them new opportunities, and they would experience no negative side effects.

Illustration 8 provides an overview of the wins and losses for private sector organisations.

Illustration 8: Wins and losses for the private sector



The private sector will clearly win from the shift to cash, but has little power to promote the reform.

Affected People

Last but not least, the shift to cash-based assistance was proposed because of its expected positive impact on crisis-affected people.

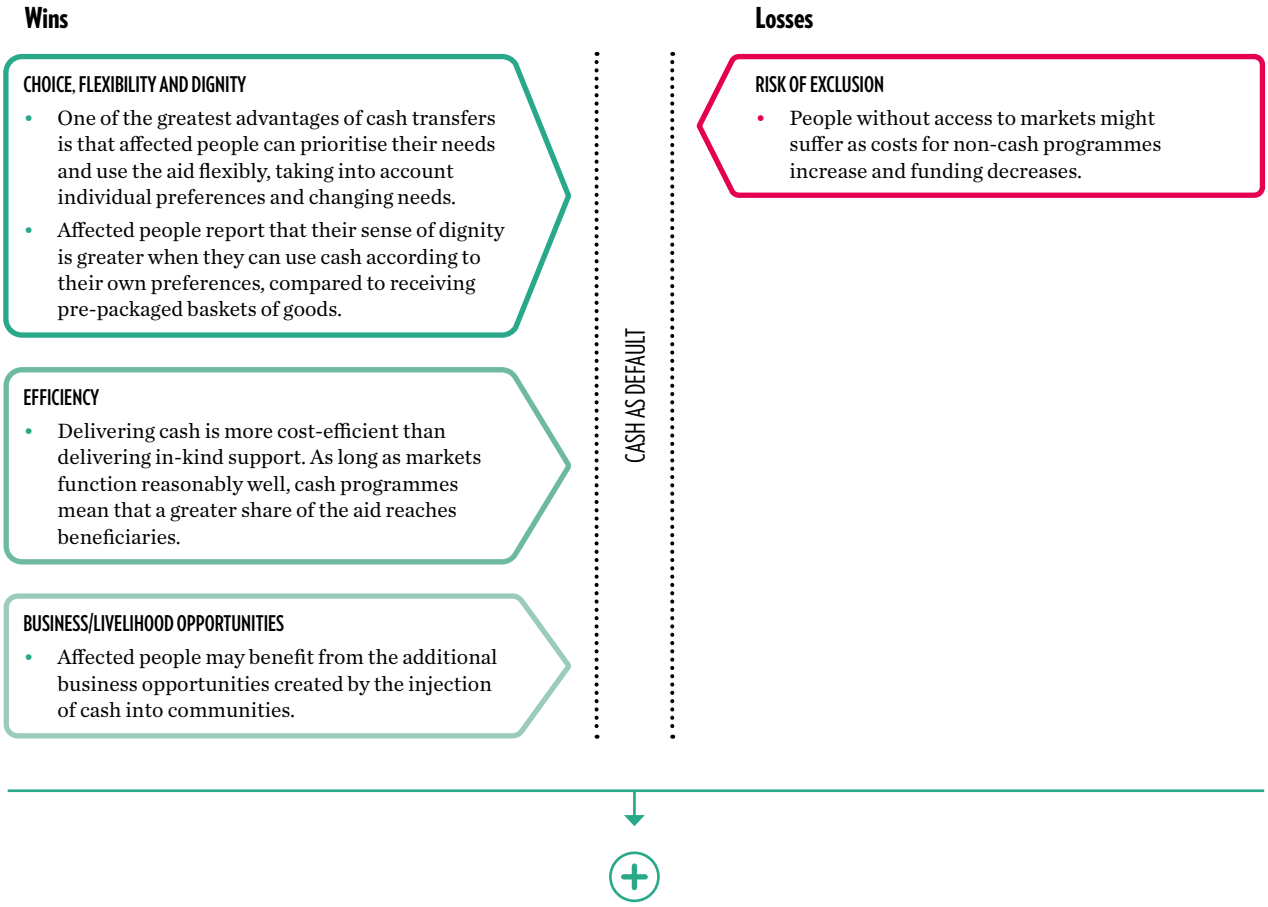
Past role: To date, crisis-affected people have largely been passive and have rarely tried to influence the delivery modalities of aid. When asked for their opinion, however, most affected people expressed their preference for cash over in-kind assistance.

Power to affect the reform: Crisis-affected people have very little power to influence whether, and how quickly, the shift to cash is implemented. They can express their preference for cash, which donors and humanitarian organisations can take into account, but they have no means of sanctioning or rewarding humanitarian organisations.

Self-interests: The majority of crisis-affected people are likely to win from the shift to cash, with the potential exception of groups that have poor access to markets and risk not receiving any alternative forms of support.

Illustration 9 provides an overview of the wins and losses for affected people.

Illustration 9: Wins and losses for affected people



Policy Implications

To date, most of the debate on humanitarian cash transfers has focused on whether or not cash transfers are desirable, and how they can be best implemented technically. The report of the High Level Panel on Humanitarian Cash Transfers acknowledged that the challenge is not only to identify what should be done, but also to examine how the mandates and interests of humanitarian organisations can enable or block reforms.

The analysis provided above has clear policy implications for those who want to support the implementation of the proposed move to large-scale, multi-sector cash programmes. An overview of the generic positions of different stakeholder groups indicates that the chances of at least partial implementation of the reform are good. Crucial stakeholders – donors, well-intentioned host governments and operational organisations hoping to lead or participate in the implementation of large-scale cash programmes – have an interest in promoting the reform. Among the likely opponents, only host governments opposed to cash-based assistance have the power to prevent the shift. Operational organisations that are unlikely to lead or participate in the implementation of large-scale cash programmes can do little to stop the reform.

Beyond that, the analysis suggests a range of measures for designing the reform so that it (a) strengthens the incentives of powerful actors to support the reform, (b) mitigates the reasons for powerful actors to oppose the reform and (c) enhances the power of those who are likely to support the reform.

Focusing on donors, the following measures for ensuring that as many donors as possible actively support the shift to cash are particularly important (a full list of policy suggestions can be found in Table 2):

1. Improve communication about the evidence on cash and invest in gathering and communicating data on the preferences of aid recipients.
2. Invest in evaluating the comparative cost-efficiency of large-scale, multi-sector cash programmes.
3. Conduct a public image campaign for cash programmes.

Donors that are intent on supporting the shift to large-scale cash programmes should prioritise the following activities:

4. Donors should make an explicit commitment to continue funding for non-cash components of a response and to accept significantly higher programming costs for these.
5. Donors should pilot large-scale, multi-sector cash programmes to demonstrate their commitment to implementing the reform and invest in evaluating their relative cost-efficiency.
6. Donors should develop reporting templates and processes that are suitable for multi-sector programmes with flexible outcomes.
7. Donors should strengthen their mutual coordination and cooperation on cash – for example, by creating an externally managed, pooled fund for cash or by agreeing on a geographic division of labour for cash programmes.
8. Donors should strengthen independent market assessments and support the gathering and communication of data on the preferences of aid recipients.
9. Donors should strengthen the engagement of affected governments in discussions about humanitarian cash programmes.
10. Donors should not seek to designate a single agency as the global lead for cash. Instead, they should award large-scale contracts for cash programmes competitively to the agency or the consortium best placed in each given context.

Table 2: Policy suggestions based on stakeholder wins and losses

	Donors' wins & losses	Policy suggestions
+	**Positioning as evidence-driven donor**	• Improve communication about the evidence on the effectiveness of cash transfers and on the assumed risks of cash programming among relevant donors. • Invest in gathering and communicating data on the preferences of aid recipients.
+	**Promise of efficiency**	Invest in evaluating the comparative cost-efficiency of pilot large-scale, multi-sector cash programmes.
-	**Problematic image of cash**	• Conduct a public image campaign for cash programmes to address the negative image of cash among governments and the general public. • Collect examples of branded cash transfers, and discuss potential solutions with banks and mobile-phone cash transfer providers.
-	**Risk of something going wrong**	Implement carefully monitored pilots of large-scale programmes first.
-	**Accounting and reporting challenges**	• Develop simple reporting templates suited to capturing outcomes in a holistic and flexible way.
	• Donor influence on the reform is limited by information asymmetry between donors and implementers.	• Strengthen the use of available independent market assessments, and/or invest in capacity for conducting them.
	• Donor agencies are limited by their lack of control over assessed contributions and general funding commitments to UN agencies.	• Closely involve foreign policy branches of the government in the reform debate, and seek to agree on necessary implications for assessed contributions and general funding commitments.
	• Donor ability to support the reform is limited by a lack of donor coordination and cooperation.	• Strengthen donor coordination and cooperation, e.g., by creating an externally managed, pooled fund for cash or by agreeing on a geographic division of labour for cash programmes.

	Affected governments' wins & losses	Policy suggestions
+	**Legitimacy through use of national social protection programmes for humanitarian transfers**	Increase investments in cash-based, national social protection programmes that can be adapted for humanitarian programming in development contexts, and focus these investments on countries at high risk of emergencies.
-	**Pressure to create social protection programmes**	Connect with development actors to develop and communicate credible plans for how humanitarian cash transfer systems could link to potential later activities for externally supported social protection programmes.
+	**Legitimacy by meeting beneficiary preferences**	Invest in gathering and communicating data on aid recipient preferences regarding cash vs. in-kind.
+	**Benefits for the local economy**	Communicate evidence of the benefits for local economies to governments.

	Affected governments' wins & losses	Policy suggestions
-	**Potential tensions with host communities**	Use needs-based (not status-based) selection criteria for cash programmes.
-	**Fear of creating incentives for displaced populations**	Design cash programmes so that they are not location-specific and thus encourage return.

	Operational organisations' wins & losses	Policy suggestions
+	**Higher staff satisfaction**	• Include operational humanitarian agencies in the communication campaign about the benefits of cash programming. • Invest in gathering and communicating data on the preferences of aid recipients.
+	**Remain relevant in a system shifting to cash**	• Increase donor coordination, and seek to increase the number of donors (especially large donors) supporting cash programming. • Clearly define and communicate donors' strategic vision for cash. • Make the commitment to cash more credible by implementing large-scale, multi-sector cash programmes as soon as possible.
+	**Opportunity for strategic reorientation and new focus for non-cash leads**	• Actively support processes of strategic reorientation. • Reward plans for strategic shrinking, and/or focus on programmes or areas complementing cash.
+	**Hope for additionality**	• Build explicit assumptions about the expected growth of the humanitarian sector into any model for the shift to cash. • Present related figures as absolute changes to available funding ($ value), rather than relative shares of funding (% of budget).
-	**Need for investments into capacities for cash deliveries**	Continue supporting, or increase support for, initiatives to strengthen preparedness and capacities for cash programming.
-	**Concerns about continued ability to implement non-cash programmes**	Make an explicit commitment to continue funding non-cash programmes where necessary, even if unit costs increase due to the shift to cash.
-	**Pressure to reduce overhead**	Generally increase demand for transparency on programming and overhead costs (irrespective of the delivery modality).
-	**Reduced ability to negotiate access for normative components** The number of operation organisations that see themselves as potential cash leads and are thus more likely to support the reform depends on how the reform is implemented. The threat of third parties (e.g., World Bank) taking over emergency cash programming reduces the ability of humanitarian organisations to oppose the reform.	• Promote joint strategies for negotiating access for humanitarian country teams. • Link delivery of large cash programmes to these negotiations. • Do not assign a formal mandate for cash programming to a single lead agency; rather, award large-scale cash contracts to the best bidders in each context. • If possible, award pilot contracts for large cash programmes to different organisations in different contexts. • Continue involving well-placed development actors like the World Bank in the global discussion on cash. • Consider awarding a pilot contract for a large humanitarian cash programme to a development organisation if it is well placed for this.

2. Making Accountability to Affected Populations a Reality

Accountability to affected populations has become a humanitarian imperative over the past two decades. International humanitarian actors agree, however, that the humanitarian system falls short of this ambition and thus needs to strengthen its accountability to affected populations.[30]

One key challenge of making accountability to affected populations a reality is that it is difficult to pin down what it actually signifies. Accountability to affected populations means different things to different actors, and they use it with diverse interests in mind. But the elusiveness of the concept has a political advantage. It allows each actor to derive its own interpretation and thus makes political consensus easier to achieve. The disadvantage is that the policies surrounding an elusive concept are difficult to put into practice. As a result, humanitarian organisations may be committed to the idea of accountability to affected populations without substantially changing the way in which they work – a common issue when dealing with "organised hypocrisy".[31]

More strongly than in the other cases of reform analysed in this paper, accountability to affected populations is a highly normative reform effort. Therefore, this chapter will briefly explore the origins and meanings of accountability to affected populations before analysing the interests and incentives related to the proposed reform.

Accountability to Affected Populations Has Many Different Meanings

Historically speaking, the term "accountability" travelled a long distance before reaching the humanitarian sphere. It originates from theories about the modern democratic state as it developed in Western Europe and North America in the 16th century. The idea of democratic accountability is often the implicit reference point for humanitarians when they think about humanitarian accountability.[32] But the context for humanitarian accountability is fundamentally different, and the same mechanisms do not apply.

30 Barnett, M. and Walker, P. (2015). Regime Change for Humanitarian Aid. How to Make Relief More Accountable; Brown, D. and Donini, A. (2013). Rhetoric or Reality? Putting affected people at the centre of humanitarian action.

31 Brown, D. and Donini, A. (2013). Rhetoric or Reality? Putting affected people at the centre of humanitarian action; See Brunsson, N. (1989) The Organization of Hypocrisy: Talk, Decisions and Actions in Organizations; Krasner, S. D. (1999) Sovereignty: Organized Hypocrisy; Lipson, M. (2006) Organized Hypocrisy and Global Governance: Implications for UN Reform.

32 This is expressed, for example, in the description of the humanitarian accountability reform as a pledge "to democratize the delivery of assistance". Barnett, M. and Walker, P. (2015) Regime Change for Humanitarian Aid. How to Make Relief More Accountable, 135.

In modern democracies, accountability is a means of legitimising the relationship between the rulers and the ruled. The government's ability to use force and appropriate part of its citizens' money creates a problem of legitimacy: Why should the state be allowed to interfere so powerfully into people's lives? To avoid popular uprising, the government must be seen as acting in line with the will of the people. Democratic accountability ensures this with the help of two key mechanisms: elections and budgetary control,[33] which are guaranteed by constitutional rights.

While the democratic concept of accountability resonates strongly in the humanitarian system, the nature of the power asymmetry is fundamentally different in this context. Power relations run between donors and humanitarian agencies on the one hand, and between international humanitarian agencies and the local population on the other. Humanitarians have no means of forcing their way, and they cannot extract money from anyone and have to ask for donations. That is, while humanitarians are more powerful than the people they serve, they are less powerful than their donors and other actors, such as local governments or warring groups.

Accordingly, the accountability mechanisms used in the humanitarian system also differ. While they broadly fall into three categories, there is no common or commonly accepted definition of these mechanisms. The closest link between democratic accountability and humanitarian accountability is the reporting line between donors and humanitarian agencies. This so-called *upwards accountability* creates transparency about government expenditure. The reports of the humanitarian agencies help donor governments to justify their humanitarian spending to parliaments and tax payers.

Upon the introduction of the cluster system in 2005, the idea of *horizontal accountability* between humanitarian agencies developed. Complementing upwards accountability, horizontal accountability is based on the reasoning that each individual agency must take on responsibility for the success of the collective response because affected people often do not distinguish between different agencies. The noticeable success or failure of one organisation easily translates into the success or failure of the humanitarian community as a whole.[34]

In parallel with upwards and horizontal accountability, accountability to affected populations, or *downwards accountability*, gained ground. In response to the protection failures in the late 1990s, including the genocides in Rwanda and Bosnia, the humanitarian field engaged in critical self-reflection by, for instance, creating the Joint Evaluation of Emergency Assistance to Rwanda and developing new rules and institutions,[35] most of them promoting a different understanding of humanitarian accountability, as Table 3 shows.

33 Fearon, J. (1999) Electoral Accountability and the Control of Politicians; Ferejohn, J. (1999) Accountability and Authority; Soll, J. (2014) The Reckoning.

34 CHS Alliance (2015) Humanitarian Accountability Report.

35 Eriksson, J. (1996) Joint Evaluation of Emergency Assistance to Rwanda; Barnett, M., and Walker, P. (2015). Regime Change for Humanitarian Aid. How to Make Relief More Accountable; Doane, D. (2016) The Future of Aid: Will International NGOs survive?

Table 3: Accountability initiatives and their interpretation of humanitarian accountability

Initiatives	Interpretation of humanitarian accountability
Joint Red Cross/NGO code of conduct (1995)	Humanitarian accountability is accountability to donors and to "those we seek to assist".[36]
People in Aid (founded in 1995)	Humanitarian accountability means improving professionalism and performance of humanitarian sector.[37]
Active Learning Network for Accountability and Performance in Humanitarian Action (ALNAP, 1997)	Humanitarian accountability means improving professionalism and performance of humanitarian sector through learning.
Sphere Project (1997)	Humanitarian accountability means improving professionalism and performance of humanitarian sector through common quality standards.
Humanitarian Accountability Partnership (HAP, 2003)	Humanitarian accountability means improving professionalism and performance of humanitarian sector through certification.
Humanitarian Response Review (2005)	Accountability means improving humanitarian response through better coordination and leadership.[38]
Transformative Agenda (2011)	Accountability to affected populations is the overall result of efforts to strengthen leadership, accountability and coordination.
CHS Alliance (2015): merger of People in Aid and HAP	See section on the reform proposal below.

There Are Two Broadly Supported Reform Proposals

How do humanitarians intend to put accountability to affected populations into practice? Given the concept's fuzzy nature, it is hardly surprising that there is no single coherent reform goal. Nevertheless, there are a number of reference points: the Inter-Agency Standing Committee's "Five Commitments on Accountability to Affected People/ Populations",[39] the Core Humanitarian Standard (CHS), which includes three elements that have accountability at their centre, and the suggestions of individual experts to take "accountability to the next level."[40] The expert suggestions are particularly ambitious. They call for a regime change, system-level accountability, co-governance of aid between international agencies and national actors as well as gaining the support of affected communities through diplomacy and advocacy.[41] Unlike the IASC's Five

36 IFRC and ICRC (1995) The Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief, http://www.ifrc.org/Docs/idrl/I259EN.pdf

37 Jordan, P. and Van Tuijl, P. (2012) NGO Accountability: Politics, Principles and Innovations.

38 Adinolfi et al. (2005) Humanitarian Response Review.

39 IASC (2013) Commitments to Accountability to Affected Populations.

40 CHS Alliance (2015) Humanitarian Accountability Report, chapter 13.

41 Cf. Barnett, M. and Walker, P. (2015) Regime Change for Humanitarian Aid. How to Make Relief More Accountable; CHS Alliance (2015) Humanitarian Accountability Report, chapter 13.

Commitments and the Core Humanitarian Standard, however, these suggestions do not represent a political consensus. Therefore, this study exclusively uses the IASC and CHS commitments as reference points.

The **Inter-Agency Standing Committee** formulates the key objective of reform in the following way:

> To create a system-wide "culture of accountability": institutionalisation of AAP [accountability to affected populations], including PSEA [protection from sexual exploitation and abuse], in function and resourcing within each humanitarian organization alongside system level cohesion, coordination, and learning.[42]

According to the IASC, a "culture of accountability" involves three concrete elements. First, it requires all humanitarian organisations to take account of the priorities, suggestions and feedback of affected populations, "giving communities meaningful influence over decision-making." Second, it means that all humanitarian organisations account for what they do and how they do it by sharing information "about agencies and their roles and responsibilities, about entitlements and targeting criteria, [...] and about how to [...] raise complaints." Third, in a culture of accountability, humanitarian organisations should be held accountable by the affected community by creating "the opportunity to assess and, where feasible, alter or sanction humanitarian actors' actions." The realisation of such a culture of accountability is "necessary at the level of individual agencies but is also crucial at the collective level and for the Humanitarian Country Team and clusters."[43]

In the **Core Humanitarian Standard**, on the other hand, the accountability reform goal is formulated in the following way:

> Communities and people affected by crisis know their rights and entitlements, have access to information and participate in decisions that affect them. [They] have access to safe and responsive mechanisms to handle complaints. [They] can expect that the organisations assisting them are managing resources effectively, efficiently and ethically.[44]

These three accountability-related standards are amended by a set of results-oriented indicators that clarify the reform goals. The indicators highlight, among other things, the inclusion of "the most vulnerable" and those "groups or individuals traditionally excluded from power and decision-making processes." They also stress that the affected populations have to be "satisfied with the opportunities they have to influence the response." The indicators aim to ensure that the feedback received from the affected population leads, if appropriate, to the adaptation of programming. Finally, the CHS performance indicators request that affected populations are kept aware of the

42 IASC (2016) IASC Task Team on Accountability to Affected Populations and Prevention of Sexual Exploitation and Abuse (AAP/PSEA), https://interagencystandingcommittee.org/accountability-affected-populations-including-protection-sexual-exploitation-and-abuse.

43 IASC (2015) Accountability to affected populations - a brief overview, 1.

44 CHS Alliance (2015) Humanitarian Accountability Report, 15, 19, 33.

humanitarian organisations' community-level budget and that the budget is spent according to the intended purpose and without waste.[45]

The Reform Proposals Have Some Common Ground, But Leave Key Questions Open

Between the IASC and CHS commitments, we can identify a common core of the accountability reform, consisting of four commonalities and two complementarities.

First of all, both approaches largely agree that accountability to affected populations is both a moral obligation and a means of building a more effective humanitarian response. Second, both proposals are based on the understanding that the core of accountability to affected populations is two-way communication, meaningful participation and the ability to provide feedback and file complaints where necessary. Third, they both seek to integrate accountability to affected populations into the entire programme cycle – from needs assessment, to design and implementation, to monitoring and evaluation. Fourth, both proposals call for the inclusion of the most vulnerable and those who are traditionally marginalised in the humanitarian decision-making process.[46] Finally, both proposals ultimately see accountability to affected populations as something that is voluntarily granted by aid organisations.[47]

As for the complementarities, the IASC commitments target humanitarian agencies. They aim to realise a system-wide "culture of accountability". To this end, they call on humanitarian organisations to provide leadership, resources and inter-agency coordination. To ensure that accountability is put into practice, the IASC relies on the successive institutionalisation of informal norms for humanitarian organisations. In turn, the CHS commitments "are written from the point of view of crisis-affected communities".[48] As a result, they concentrate on making accountability a reality at the community level. To this end, the CHS Alliance believes it is most expedient to work on the basis of results-based indicators that help humanitarian organisations align their responses with their accountability policies.

This common core aside, there remain open questions regarding the ambition and practicability of the accountability reforms. First, this relates to the question of representation, particularly if the aim of the reform is to go beyond information and feedback to ensure meaningful participation. Not every person in an affected community can be included in humanitarian decision-making, but the proposals do not elaborate on how systems of representation can be created. By using existing government and authority structures? By creating new representative bodies? What are the ensuing consequences for the power balance within a community, and for the

45 CHS Alliance (2015) Humanitarian Accountability Report, chapters 4, 5, 9.

46 IASC (2015) Accountability to affected populations - a brief overview; CHS Alliance (2015) Humanitarian Accountability Report.

47 This is the case even though the two proposals use very different languages. The IASC uses language that appeals to voluntary power-sharing: organisations may consider the feedback provided; they grant the affected population the possibility to participate, etc. The CHS, on the other hand, uses rights-based language, but restricts the proposal with the small instruction that all of this should be done if appropriate. Deciding the appropriateness of a measure, of course, rests with the humanitarian organisation.

48 CHS Alliance (2015) Humanitarian Accountability Report, 108.

neutrality and independence of humanitarian organisations? These questions are especially tricky in conflict and non-camp settings.

Furthermore, just as the humanitarian community cannot engage with every affected individual, affected communities cannot engage with every humanitarian organisation. Particularly in highly visible, easily accessible crises, communities are served by a considerable number of humanitarian actors. To become reality, the reform proposals of the IASC and the CHS need to move beyond coordination towards a consolidation of the humanitarian sector. But both platforms remain silent on what this consolidation would look like and how it could be achieved.

The two most fundamental open questions, however, relate to the limits of beneficiary power and the potential conflicts between accountability to affected populations and humanitarian principles. Affected populations have limited means of making a bid for power. Nevertheless, once power is handed over, the question of how that power can be kept in check remains unaddressed. Thus far, the focus has been on how humanitarian agencies can use their power responsibly. Meanwhile, the reform proposals do not address the question of how to ensure that affected populations use their newly won power just as responsibly. This silence is partly rooted in the fact that beneficiaries often have very little power in the first place. But it is also partly rooted in a simplified picture of the affected population as a homogenous, inherently "good" or "innocent" group of people with objective needs.[49] In other words, the power dynamics within the affected community are largely absent from the discussion about accountability. This is particularly problematic for local staff and international field workers. Local staff can be part of the political power dynamics within their community, which may make them vulnerable to the misuse of feedback or complaints mechanisms. The same is true for international field workers, who often do not know those power dynamics in detail. Therefore, while the problem of power misuse by affected populations may seem theoretical at first sight, the fear of being exposed to unjustified beneficiary feedback is real for local and international field workers.

Closely related to this problem is the question of whether accountability to affected populations is compatible with humanitarian principles. Many accountability supporters are quick to argue that the two are compatible, that you can work through existing local structures of representation while remaining neutral, and that you can give affected people a say in the kind of aid they receive and how they receive it while remaining independent.[50] But it is unrealistic to assume that all parties to the conflict would agree to have an organisation work through their respective representative mechanisms at the same time. The political interests of being the one structure chosen by an international actor to represent the affected population and of being involved in the organisation and distribution of aid are simply too high.[51]

49 Malkki, L.H. (1996) Speechless Emissaries: Refugees, Humanitarianism, and Dehistoricization.

50 CHS Alliance (2015) Humanitarian Accountability Report, chapter 13.

51 Cf. Martinez, J. C. and Eng, B. (2016) The Unintended Consequences of Emergency Food Aid.

Illustration 10: The reform proposal for AAP

THE REFORM PROPOSAL

There is not one coherent reform proposal. The IASC and CHS proposals share a common core:

- Two-way communication
- Affected populations receive information about aid and know their rights and entitlements.
- Accessible, safe and responsive feedback mechanisms
- Meaningful participation
- Inclusion of the most vulnerable and traditionally marginalised
- Agencies grant accountability to affected populations voluntarily.

This happens:

- Throughout the entire programme cycle
- At the agency level, at the HCT/cluster level and at a system-wide level

Thought Experiment: What If Accountability to Affected Populations Was Made a Reality?

To model the fully accountable humanitarian system of the future, the following thought experiment builds on the common reform core and provides answers to the open questions raised in the previous section. Our answers are based on what we believe to be the most realistic course of events: a modest reform that results from a battle between the opposing forces of institutional inertia and strong pressure, particularly from outside the humanitarian sector, and a reform that finally makes good on the promise of accountability.[52]

Based on our assumptions, the future accountable humanitarian system could look like this: **inclusive communication, participation and feedback/complaints mechanisms** are put into practice across all humanitarian organisations. That is, they are fully recognised by all relevant staff from leadership and policy levels, down to local and field-level staff. System-wide mechanisms are put into practice across all crises and across the entire programming cycle. However, there are clear limits to the calls for accountability to affected populations. The entire process remains based on strong, but not legally binding voluntary commitments by humanitarian agencies. This means that final decision-making power remains with international humanitarian actors and is not transferred to affected populations. This is also reflected in the practice of giving precedence to humanitarian principles over the preferences of affected populations in cases where they are incompatible.[53]

52 Barnett, M. and Walker, P. (2015) Regime Change for Humanitarian Aid. How to Make Relief More Accountable; Doane, D. (2016) The Future of Aid: Will International NGOs survive?

53 Despite the fact that a number of humanitarian actors have questions about the feasibility and usefulness of the principles as ubiquitous guidelines for humanitarian action, most humanitarian actors remain committed to the humanitarian principles in the run-up to the World Humanitarian Summit; cf. CAFOD (2015) Joint Statement on Humanitarian Principles. The model thus assumes that the principles remain more important than, for instance, the Sphere Standards as a norm around which dominant humanitarian actors rally.

Two preconditions have been fulfilled to ensure the full participation of affected communities across operations. First, humanitarian organisations have established different **representative structures** that are capable of acting on behalf of the entire affected population. Depending on the context, these "representative groups" are camp councils (in camp settings), local government or authorities (in natural disaster settings) or parallel representative groups (in conflict settings). Humanitarian organisations have learned to work more effectively through local structures, with all of their implications. In conflict settings, the establishment of representative groups is a difficult and deeply political activity. What is more, across all settings, the setup of these representative groups is often time-intensive.

Second, **humanitarian organisations consolidate** in specific geographical areas of the response by working in consortia (including national and international NGOs), especially in well-served crises. In these areas, competition among NGOs is reduced, while the quasi-oligopolistic structure of the humanitarian sector is enhanced. This development has been spurred by donor funding policies that prioritise common participatory needs assessment, feedback frameworks and monitoring and evaluation processes. An alternative approach to consolidation that can be observed is the use of external agencies to implement common needs assessments and to organise a collective communication system (including monitoring and evaluation) with the affected communities. As a result, clusters have diminished in importance at the local level, but they remain the locus of coordination on the national and regional levels.

Third, **donors have changed funding practices** in two fundamental ways. They now use satisfaction data from the affected population as a criterion for funding decisions.[54] When NGO consortia underperform, in the opinion of community representatives, donors follow up with the relevant consortia and pressure them to improve their aid practices. Donors have also agreed to more-flexible funding schemes so that humanitarian organisations can react to community feedback.

Finally, the humanitarian field has established **communication strategies** that enable it to share with the affected population information about the goods and services that humanitarians, according to their mandate and commitment to humanitarian principles, are capable of providing. The same is true for beneficiary selection criteria. Nevertheless, feedback from affected populations, particularly in countries of lower-middle income, often reveals a mismatch between the goods and services that humanitarians can provide and those that the affected population would like to receive. The same holds true for beneficiary selection.[55] In response to this feedback, many humanitarian organisations have started to blend humanitarian and development activities more strongly.

54 CHS Alliance (2015) Humanitarian Accountability Report, chapter 4.

55 Cf. Anderson et al. (2012) Time to Listen: Hearing People on the Receiving End of International Aid.

Illustration 11: Full implementation of AAP

THE REFORM PROPOSAL FULLY IMPLEMENTED

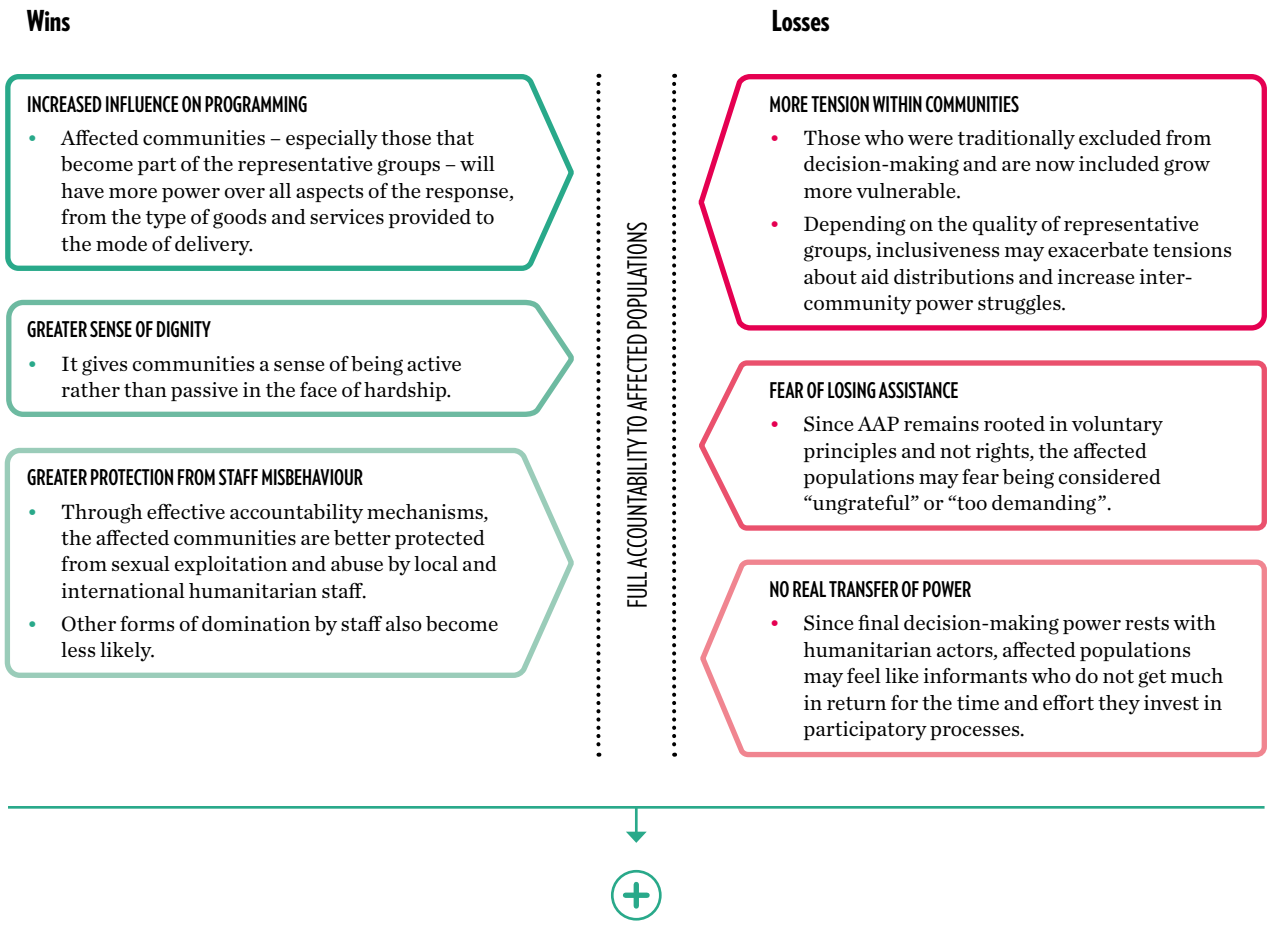
- Inclusive communication, participation and feedback mechanisms are streamlined across all humanitarian agencies and the entire programming cycle.
- AAP is implemented across all crises, but there exists precedence of humanitarian principles over the preferences of affected populations in cases where they are incompatible.
- Fully realised AAP looks different in different contexts:
  - Camps vs. non-camp settings
  - Conflicts vs. natural disasters
  - Well-served vs. under-served crises/communities
  - Middle-income vs. least-developed countries
- AAP is based on strong, but not legally binding, voluntary principles.
- Final decision-making remains with humanitarian actors.
- Representative groups act on behalf of the affected populations.
- Area-based consolidation of implementing agencies or outsourced common service providers for communication, needs assessments and feedback
- Blending of development and humanitarian activities
- Donors use satisfaction data as a criterion for funding decisions.
- More-flexible funding schemes

Stakeholder Self-Interests and Power to Affect the Reform

Like all reform efforts discussed in this paper, the accountability reform was suggested because it is assumed to result in better assistance to people affected by crises. But it is important to note that the reform efforts also affect the organisational and individual self-interests of affected populations, local governments and authorities, field workers, humanitarian organisations, donors and global accountability initiatives. This section explores the reform's effects on the (organisational) self-interests of key stakeholders. It summarises which stakeholder groups are expected to "win" and which are expected to "lose" through the reform's implementation, and examines how much power they have to promote or obstruct the reform.

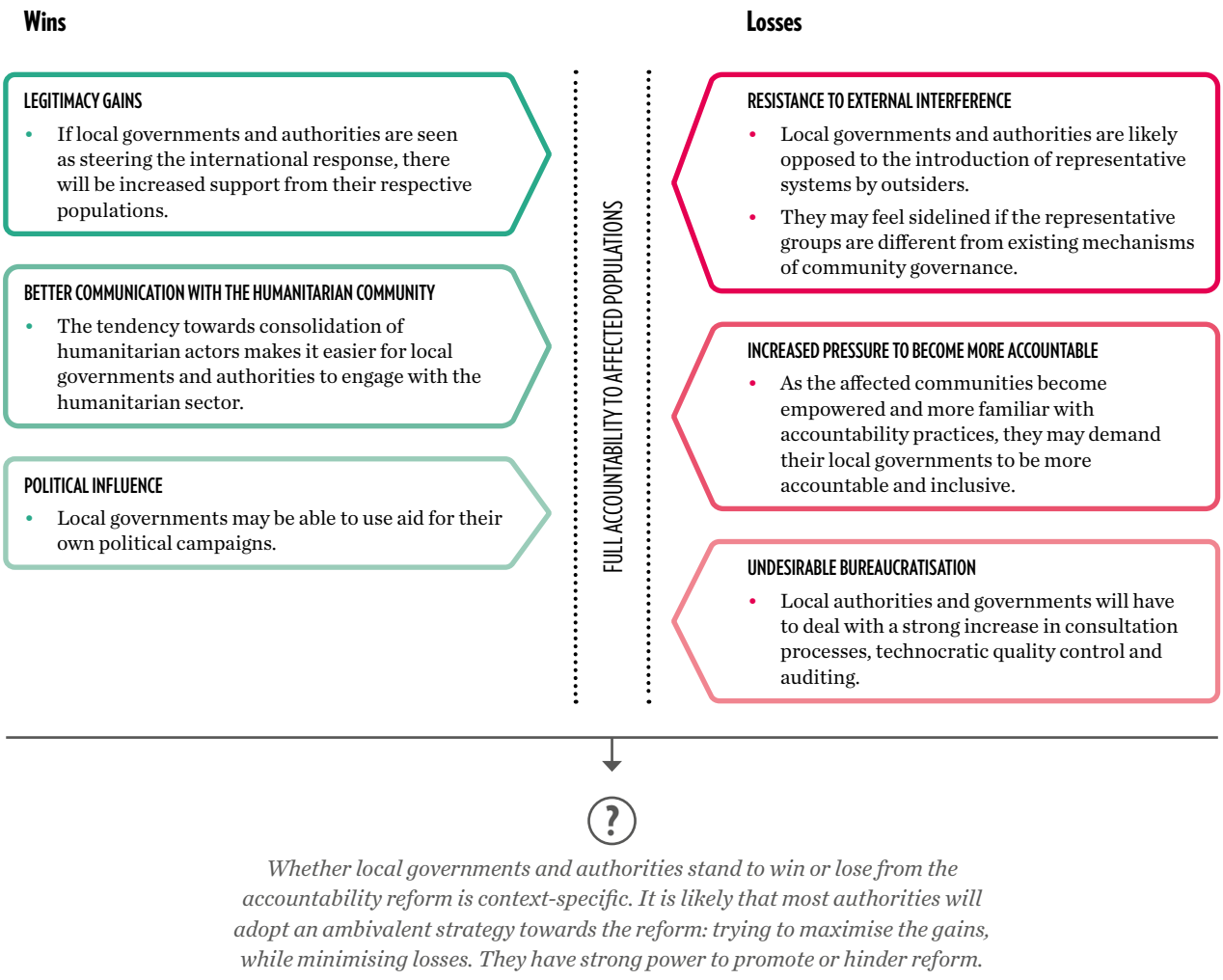
It is important to keep two aspects in mind when reading this analysis. First, "no change" is always easier than "change". It will require a lot of effort for any reform initiative to overcome the inertia of the humanitarian system. Second, self-interests do not automatically determine the position taken by an organisation or a group of individuals. Even if an organisation is set to "lose" through the reform, its normative or political commitment to the reform can be so strong, that it nonetheless actively supports the reform effort.

Illustration 12: Wins and losses for affected populations



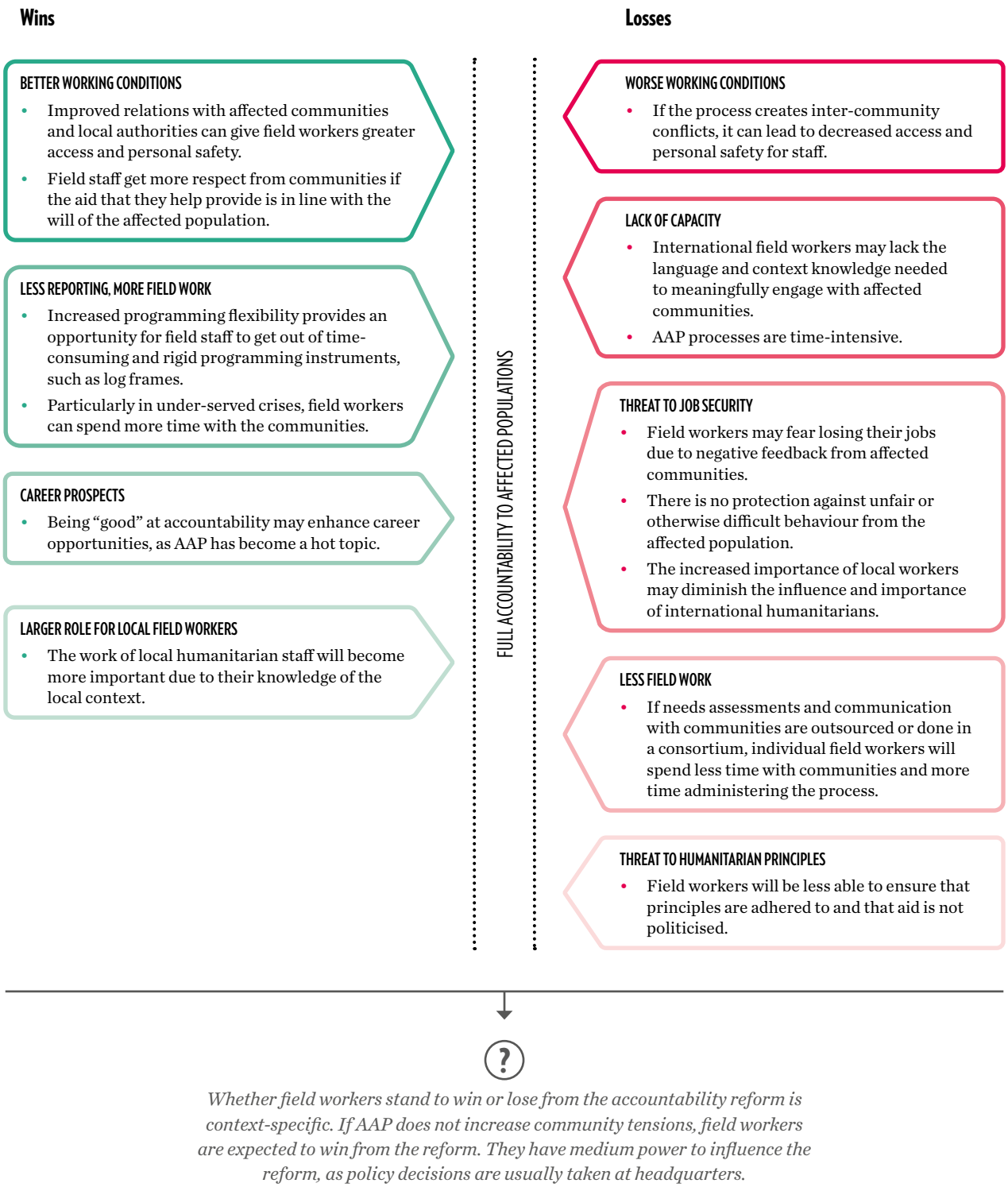
Affected communities are expected to win from the accountability reform, particularly in contexts that allow for a coherent and fair implementation of accountability mechanisms. Overall, affected populations have limited power to push for, but strong power to hinder, reform through non-cooperation.

Illustration 13: Wins and losses for local governments and authorities



Whether local governments and authorities stand to win or lose from the accountability reform is context-specific. It is likely that most authorities will adopt an ambivalent strategy towards the reform: trying to maximise the gains, while minimising losses. They have strong power to promote or hinder reform.

Illustration 14: Wins and losses for local and international humanitarian field workers



Whether field workers stand to win or lose from the accountability reform is context-specific. If AAP does not increase community tensions, field workers are expected to win from the reform. They have medium power to influence the reform, as policy decisions are usually taken at headquarters.

Illustration 15: Wins and losses for humanitarian organisations

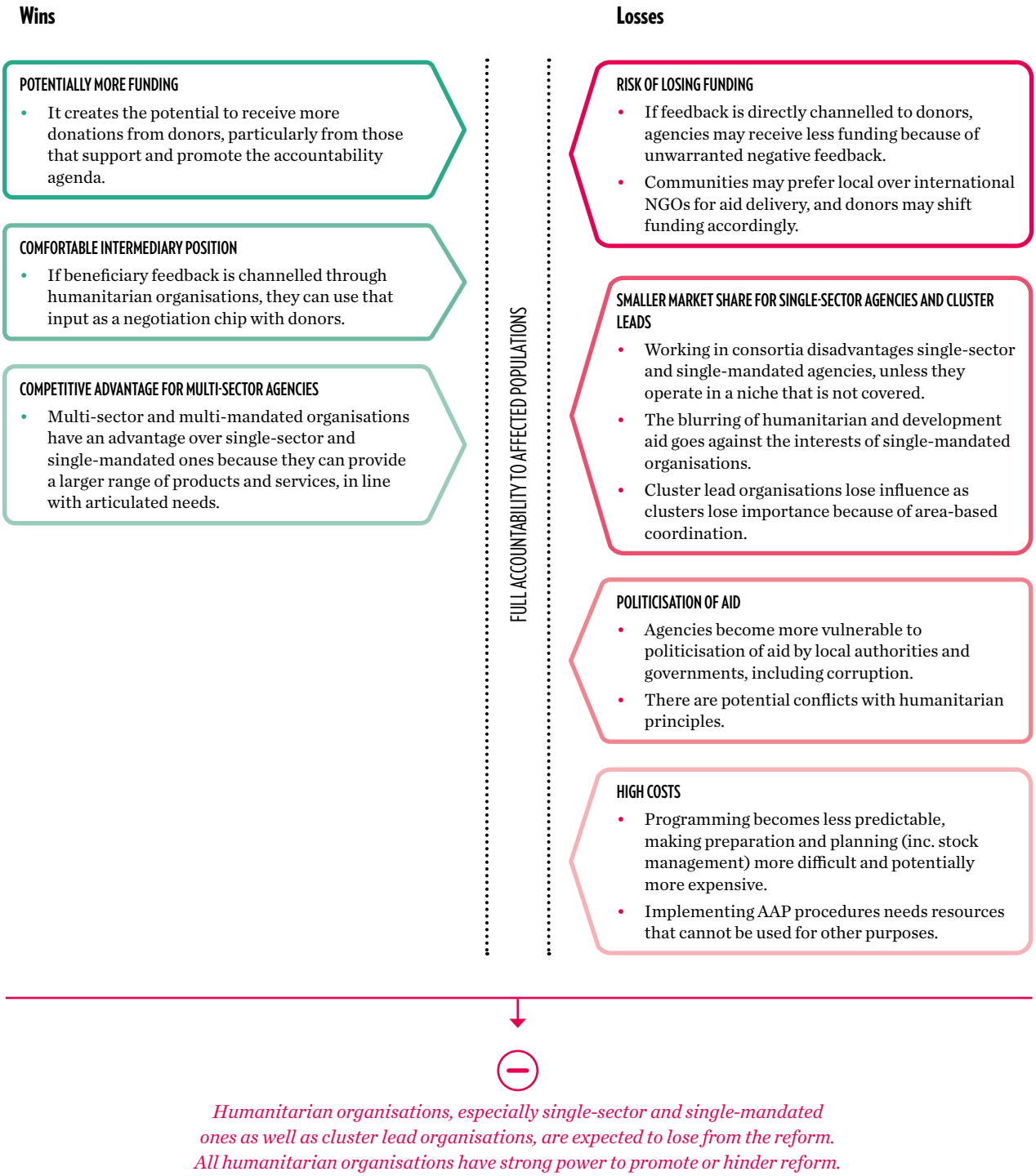
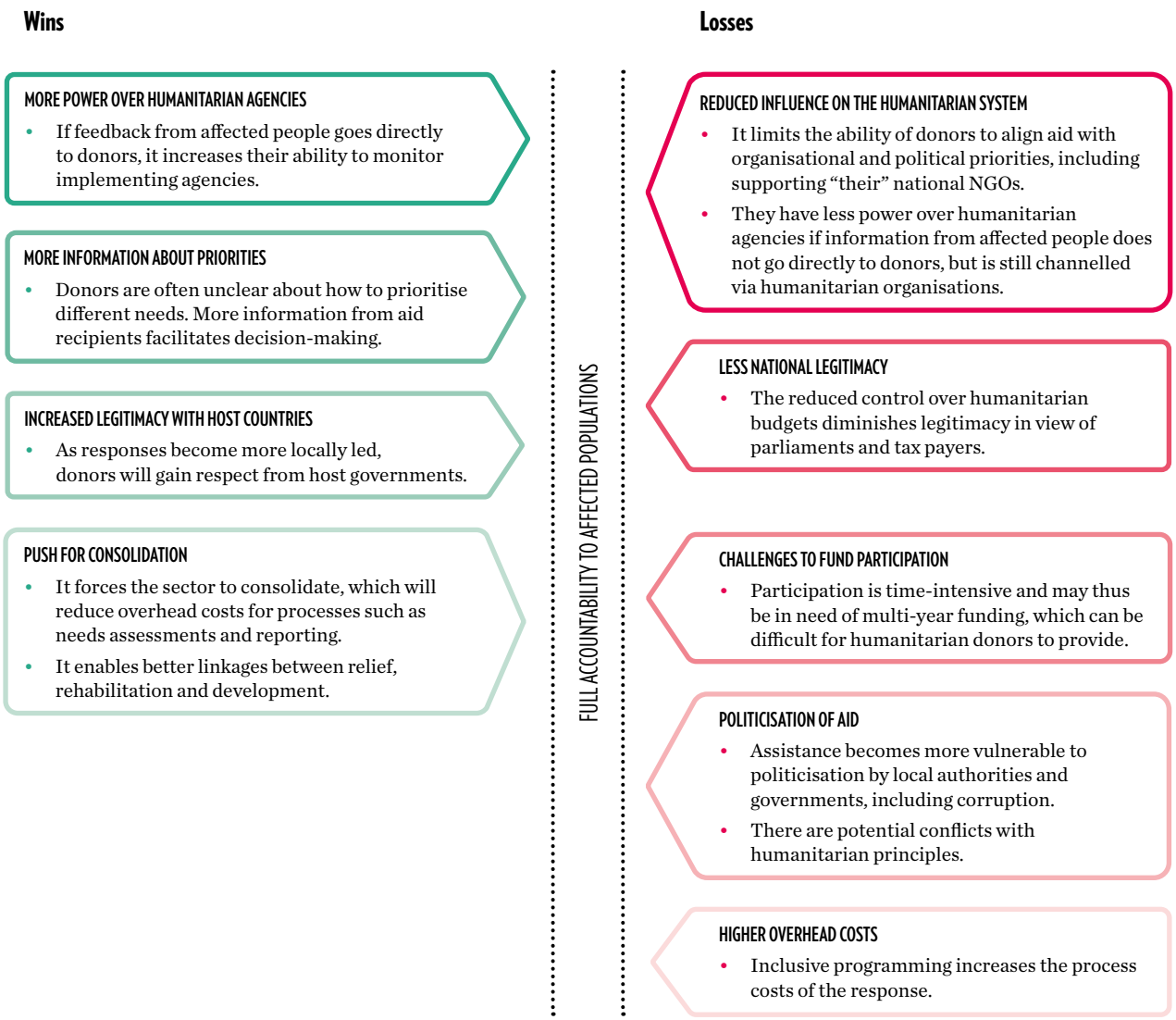
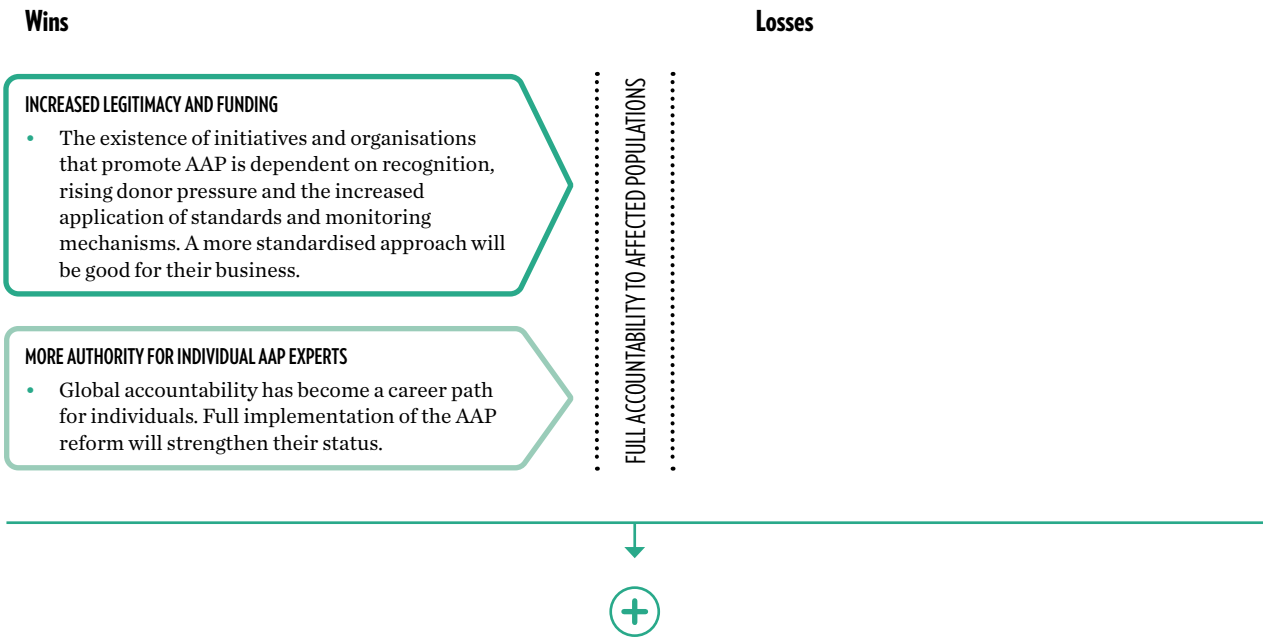


Illustration 16: Wins and losses for donors



From a perspective of self-interest, most donors stand to lose from the accountability reform. They have strong power to promote or hinder its implementation.

Illustration 17: Wins and losses for global accountability initiatives



Global accountability initiatives are expected to win from the reform. They have medium power to set the agenda around the issue, but limited power to push for implementation.

Policy Implications

While rhetorical commitment to accountability to affected populations is strong, the concept remains contested. The fact that democratic accountability often serves as an implicit blueprint for thinking about humanitarian accountability is reflected in the question of whether accountability should be rights-based. On the one hand, the purely voluntary nature of humanitarian accountability limits the extent to which the humanitarian sector can be accountable to affected populations, as demonstrated by our thought experiment. A more ambitious, rights-based approach, on the other hand, would create serious political and practical problems, as it cannot function in the absence of key democratic accountability mechanisms: elections and budgetary control. Unsurprisingly, then, the latest ambitious reform proposals by accountability initiatives and experts include calls for the co-governance of aid, including budget control for beneficiaries and the inclusion of minorities and marginalised groups in the decision-making process.[56]

Consequently, proponents of accountability to affected populations face a difficult choice: to live with limited humanitarian accountability to affected populations through

56 CHS Alliance (2015) Humanitarian Accountability Report, chapter 13; Barnett, M. and Walker, P. (2015) Regime Change for Humanitarian Aid. How to Make Relief More Accountable.

self-restraint, or to be more ambitious, but risk turning the accountability reform into a democracy-exporting venture. In the latter case, actors would need to think about ways to create appropriate representative structures for the affected populations and establish the legal basis on which to call for binding commitments. Furthermore, a more radical accountability reform would lead to an increase in power of local actors to the detriment of the "elite players" of the UN-centred humanitarian system: Western donors, international NGOs and UN agencies.[57] Unsurprisingly, there seems to be implicit agreement among these actors to not go the full way by proposing binding mechanisms. The accountability reform is in practice considerably less ambitious than it seems in policy documents. Our thought experiment reflected this gap between rhetoric and reality.

A closer look at the interests and incentives of the different stakeholders reveals the underlying reasons for why commitment to the accountability reform remains patchy. All stakeholders – except those of global accountability initiatives – have more power to hinder than to promote the reform. Moreover, the stakeholders that have the power to implement reform – local governments and authorities, humanitarian organisations and donors – would all have to accept important losses related to their interests. In reverse, those with a strong interest in implementation – the affected population, local NGOs, humanitarian workers and global accountability initiatives – have limited power to do so. Thus, the formation of a "coalition of the unwilling" is likely to occur. The moral obligation of being accountable to affected populations stands in clear contrast to this dynamic: it is the main reason why promoting accountability rhetorically, but not in substance, is such an attractive option for many stakeholders.

But looking at the accountability reform from this bird's-eye perspective obscures the fact that individual actors – specific donors and humanitarian organisations in particular – may be more driven by the norms and ideas of accountability to affected populations and/or political commitments than by the narrow calculus of their political and economic interests. They may decide to use their power to push specific parts of the reform (e.g., improved feedback and complaints mechanisms, better provision of information to affected populations). USAID and DFID, for instance, recently introduced mechanisms into their funding policies that require humanitarian organisations to adopt stronger feedback mechanisms.

What becomes clear, however, is that promoting accountability reform is enormously context-specific, perhaps more so than other areas of humanitarian reform. The interests and incentives may vary from one donor to another, depending on the relevance of international aid in domestic politics and budgetary processes in the respective parliaments. The interest and incentives of local governments and affected populations may be tremendously different from country to country, even from community to community. The same is true for humanitarian workers. The only two stakeholder groups with a relatively coherent interest set are humanitarian agencies and global accountability initiatives. As a result, it is difficult to develop concrete policy suggestions for donors that wish to push for accountability to affected populations.

57 Barnett, M. and Walker, P. (2015) Regime Change for Humanitarian Aid. How to Make Relief More Accountable, 131.

To increase donor commitment, promoters of the accountability reform can:

1. Increase moral pressure from global accountability initiatives, backed by more empirical evidence on the assumed causal relation between increased accountability and a more effective/qualitative response.
2. Emphasise the benefits of being seen as a collaborative and reliable partner by host countries.
3. Discuss the prospect of a more consolidated humanitarian field, with stronger links between humanitarian and development aid.

Donors that are intent on supporting the implementation of the accountability reform can:

4. Work on a context-specific basis. Assess the relevant crisis, and determine, together with partner organisations and embassy staff, whether the chances of introducing coherent accountability mechanisms are good. Resist a one-size-fits-all approach. Give more weight to input from in-country staff (partner or own) than to headquarter assessments.
5. Work through diplomatic representations to temper fears of local governments about the development of parallel representative structures, allow for the representation of marginalised groups within the humanitarian response (particularly women and children), and help them build the necessary capacities to work more closely with international humanitarian organisations and to ensure effective communication, participation and feedback.
6. Create financial incentives for humanitarian organisations to take accountability to affected populations seriously – for example, by linking funding decisions to beneficiary satisfaction and by offering more-flexible funding arrangements. However, donors should remain sensitive to humanitarian organisations' concerns about potential tensions between accountability to affected populations and principled aid delivery.
7. Remain aware of the limits. Ensure that checks and balances accompany the accountability reform, which mitigate potential conflicts with humanitarian principles and possible negative side effects on community coherence and local power structures. Tailor initiatives for stronger accountability to affected populations to specific contexts, and remain wary of imposing ever more demands on humanitarian organisations operating in difficult circumstances.

3. Protection Advocacy as a Collective Humanitarian Responsibility

The Definition of Humanitarian Protection Is Disputed

Protection and the provision of assistance are widely understood as the two dimensions of humanitarian action.[58] According to the Inter-Agency Standing Committee, the purpose of protection is to obtain "full respect for the rights of the individual in accordance with the letter and the spirit of the relevant bodies of law (i.e., human rights, humanitarian and refugee law)".[59] Protection is not the exclusive domain of humanitarian actors. Humanitarian protection activities complement, and their outcomes depend on, the actions of non-humanitarian actors, including the UN Security Council, the Human Rights Council, member states, peacekeeping operations as well as development, human rights and peacebuilding organisations. Their approaches to strengthening protection include quiet diplomacy,[60] public advocacy,[61] military operations,[62] sanctions[63] and protection by presence.[64]

58 See, for example, Good Humanitarian Donorship Initiative (2013) Objectives and Definition of Humanitarian Action, http://www.ghdinitiative.org/ghd/gns/principles-good-practice-of-ghd/principles-good-practice-ghd.html.

59 IASC (2002) Growing the sheltering tree.

60 See, for example, Kinzelbach, K. (2015) The EU's Human Rights Dialogue with China. Quiet Diplomacy and its Limits.

61 See, for example, Keck, M. E. and Sikkink, K. (1998) Activists beyond Borders. Advocacy Networks in International Politics.

62 See, for example, Power, S. (2003) A Problem From Hell: America and the Age of Genocide.

63 See, for example, Tourinho, M. (2015) Towards a world police? The implications of individual UN targeted sanctions.

64 See, for example, Mahony, L. and Nash, R. (2012) Influence on the Ground. Understanding and Strengthening the Protection Impact of United Nations Human Rights Presences.

What exactly humanitarian protection entails, however, remains disputed.[65] When it comes to the current reform effort in the humanitarian system, two competing definitions of humanitarian protection are relevant:[66]

1. Protection as access to life-saving assistance and protection services

The more widely shared definition posits that the goal of humanitarian protection is to ensure that crisis-affected people have access to life-saving assistance, including food, water, medical care, shelter and specialised protection services. For example, the 1994 Joint Evaluation of Emergency Assistance to Rwanda understood humanitarian protection as the improved provision of assistance that could help prevent morbidity and mortality. Access to life-saving assistance becomes an extreme protection concern when warring parties block humanitarian aid deliveries to certain locations or population groups, as is the case in Syria, for example. Specialised protection services can be preventive or remedial. They include family unification, psycho-social support, the creation of child-friendly spaces, awareness raising among at-risk populations about sexual and gender-based violence, legal support to address gaps in documentation and the prevention of the refoulement of refugees to their countries of origin.

Within this paradigm, a major consideration has been to provide life-saving assistance and protection services in a more equitable way.[67] For example, the 2005 Humanitarian Response Review noted that it was unclear who would be responsible for addressing the needs of internally displaced persons. This contributed to the launch of the 2005 IASC Humanitarian Reform: UNHCR assumed responsibility for internally displaced persons, and the protection cluster was created and the protection standby capacity (ProCap) strengthened. Five years later, the IASC Cluster Evaluation found improvements in the coverage of some protection-related thematic areas, such as gender-based violence and child protection.[68] Inter-agency evaluations, however, continue to identify gaps in coverage.[69]

65 This has been noted as a shortcoming in all three landmark reviews that addressed humanitarian protection: Adinolfi et al. (2005) Humanitarian Response Review; Murray, J. and Landry, J. (2013) Placing Protection at the Centre of Humanitarian Action. Study on Protection Funding in Complex Humanitarian Emergencies; Niland, N. et al. (2015) Independent Whole of System Review of Protection in the Context of Humanitarian Action. In response to the criticism, the Global Protection Cluster released a communication package on protection: Global Protection Cluster (2016) Communication Package on Protection.

66 For this distinction, see Ferris, E. (2011) The Politics of Protection. The Limits of Humanitarian Action, 278; ICRC (2012) Enhancing Protection for civilians in armed conflict and other situations of violence.

67 Such an approach does not necessarily translate into an equal remedy of rights violations; rather, clearly formulated considerations determine how to achieve equity across programmes and beneficiaries. See Binder, A. et al. (2013) Reflections on the Inequities of Humanitarian Assistance. Possible Courses of Action for Germany.

68 Steets, J. et al. (2010) IASC Cluster Approach Evaluation, 2nd Phase.

69 Hanley, T. et al. (2014) IASC Inter-agency Humanitarian Evaluation of the Typhoon Haiyan Response; Clarke, N. et al. (2015) Inter-Agency Humanitarian Evaluation (IAHE) of Response to Conflict in South Sudan.

2. Protection as putting a stop to violations and punishing perpetrators

The second definition of humanitarian protection is more controversial, but it has been championed by the International Committee of the Red Cross and has recently gained ground at the inter-agency level. As the guardian of international humanitarian law, the ICRC takes concrete action to stop patterns of abuse in conflict-affected countries, such as arbitrary arrests and indiscriminate attacks on civilians and medical facilities. Its physical presence and its constant engagement with local populations and powerbrokers are believed to have a protective effect in and of themselves.[70] But more importantly, the ICRC also engages privately with duty bearers to persuade them to change their conduct, mobilises external actors and, in extreme cases, publicly denounces warring parties.[71] Geneva Call has made it its raison d'être to promote international norms for armed non-state actors, while the International Conference of the Red Cross and Red Crescent sponsors an intergovernmental consultation process to ensure that international humanitarian law remains practical and relevant.[72]

Individual IASC members (e.g., Oxfam, Médecins Sans Frontières, Norwegian Refugee Council) have embraced a similar understanding of protection.[73] UN agencies have also assumed similar responsibilities at various points in time. During the Bosnian conflict (1992–1995), UNHCR engaged directly with duty bearers for the first time and led a strong media advocacy campaign.[74] Unlike the ICRC and most NGOs, UNHCR also contributed to the punishment of perpetrators by reporting rights violations to the International Criminal Tribunal for the former Yugoslavia.[75] More recently, in Sudan, UNICEF engaged privately with the Justice and Equality Movement in Darfur, which subsequently signed a memorandum of understanding on the protection of children in 2010. OHCHR has been credited with similar successes in Colombia and Afghanistan.[76]

At the inter-agency level, however, there has been no shared sense of responsibility among humanitarian actors to improve the compliance of warring parties with international law or to support international justice mechanisms to hold perpetrators accountable. This has contributed to systemic failure in the UN's response to early warnings and to the evolving conflict situation in Sri Lanka, as found by the Internal Review Panel of the UN secretary-general. The review led to the launch of the UN Human Rights up Front initiative.[77]

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70 The majority of IASC members also consider their presence protective. For example, the 2005 Humanitarian Response Review noted that 68 percent of agencies claimed at the time that they were involved in protection and considered it one of their core areas. With the exception of protection agencies, however, few of them employed full-time protection staff.

71 ICRC (2012) Enhancing Protection for civilians in armed conflict and other situations of violence. See also Mack, M. (2008) Increasing Respect for International Humanitarian Law in Non-international Armed Conflicts.

72 International Conference of the Red Cross and Red Crescent (2015) Resolution 1: Strengthening international humanitarian law protecting persons deprived of their liberty.

73 See, for example, Brauman, R. (2012) Médecins Sans Frontières and the ICRC: matters of principle; Norwegian Refugee Council (2014) NRC Protection Policy.

74 UNHCR's pivot in humanitarian protection in Bosnia also accommodated the interests of major donors that sought to ensure that fewer people become refugees as a result of the crisis.

75 Young, K. (2001) ICRC and UNHCR in Bosnia.

76 Reichhold, U. and Binder, A. (2013) Scoping study: What Works in Protection and How Do We Know It.

77 Kurtz, G. (2015) With Courage and Coherence. The Human Rights up Front Initiative of the United Nations.

The Reform Proposal: Protection Advocacy Is a Collective Humanitarian Responsibility

Riding on the momentum of the Human Rights up Front initiative, IASC principals adopted in December 2013 the first system-wide guidance on humanitarian protection: the statement on the Centrality of Protection in Humanitarian Action.[78] As the only inter-agency proposal that discusses humanitarian protection, the statement represents the most authoritative reform proposal today and serves as the basis of the synthesis in this chapter. In addition, the 2013 joint background paper by OHCHR and UNHCR on "The Protection of Human Rights in Humanitarian Crises", the 2014 Human Rights up Front Detailed Plan of Action, and the 2016 Secretary-General's Report for the World Humanitarian Summit are used as complementary sources.[79]

The IASC statement uses the more ambitious and more controversial definition of protection outlined above. IASC principals emphasise that an "essential role" of the humanitarian community is to engage with state and non-state parties to a conflict in order to "prevent and stop the recurrence of violations of international human rights and humanitarian law".[80] To this end, protection advocacy is confirmed as a collective humanitarian responsibility in all three complementary documents, which provide further detail on the intended protection reform. Taken together, the reform proposal includes the following key elements:

1. **Humanitarian actors prioritise advocating for a stop to rights violations**. Advocacy can range from direct negotiations with duty bearers and mobilization of non-humanitarian actors, to the denunciation of perpetrators in public statements. It should include activities at both national and local levels.[81]
2. **The humanitarian coordinator (HC) and protection cluster have "direct responsibility" for advocacy.** Other humanitarian actors have indirect responsibility – for example, by "relaying relevant information with duty-bearers and other stakeholders".[82]
3. **UN OCHA will support advocacy efforts**, together with the UN Department of Political Affairs (DPA) and OHCHR, and in coordination with relevant entities. For example, UN OCHA will set up engagement with civil society, NGOs, the media and other influential stakeholders, including UN human rights bodies (e.g., Human Rights Council), member states and the Security Council.[83]

78 IASC (2013) Statement on Centrality of Protection in Humanitarian Action.

79 OHCHR and UNHCR (2013) The Protection of Human Rights in Humanitarian Crises; UN (2014) "Rights Up Front" Detailed Action Plan; UNGA (2016) One humanity: shared responsibility. Report of the Secretary-General for the World Humanitarian Summit.

80 IASC (2013) Statement on Centrality of Protection in Humanitarian Action. See also recent reviews and evaluations, such as Clarke, N. et al. (2015) Inter-Agency Humanitarian Evaluation (IAHE) of Response to Conflict in South Sudan; IASC (2015) Operational Peer Review. Response to the Crisis in Syria; IASC (2015) Operational Peer Review. Response to the Crisis in Iraq.

81 IASC (2013) Statement on Centrality of Protection in Humanitarian Action; OHCHR and UNHCR (2013) The Protection of Human Rights in Humanitarian Crises.

82 OHCHR and UNHCR (2013) The Protection of Human Rights in Humanitarian Crises.

83 IASC (2013) Statement on Centrality of Protection in Humanitarian Action; OHCHR and UNHCR (2013) The Protection of Human Rights in Humanitarian Crises; UN (2014) "Rights Up Front" Detailed Action Plan.

4. The humanitarian country team adopts a comprehensive **humanitarian protection strategy**.[84]
5. The humanitarian protection strategy is one contribution to the resident coordinator's larger **UN-wide protection strategy** that balances "its political, security, human rights, development and humanitarian priorities".[85]

Illustration 18: The reform proposal for protection advocacy

THE REFORM PROPOSAL

- Humanitarian actors prioritise advocating for a stop to human rights violations.
- The HC and the protection cluster have direct responsibility for advocacy.
- UN OCHA supports advocacy efforts.
- Humanitarian country teams adopt a protection strategy.
- The resident coordinator adopts a UN-wide protection strategy.

The main reform document, the IASC statement, does not address whether humanitarians should contribute to holding perpetrators accountable. While the other three source documents raise such expectations, they do not provide any detail. Therefore, in our model, we will not consider any related change as part of the reform proposal. Similarly, we will not consider elements of the reform proposal that relate to regional support mechanisms and the mobilization of external actors such as the UN Security Council, in which UN OCHA would play a role. Instead, our model focuses on country-based mechanisms that we consider to be the gist of the reform.

The documents also suggest a series of more concrete steps to implement the proposed reform. First, they include a range of capacity building measures. For example, OHCHR will develop tailored induction trainings for all UN staff to clarify what might be expected of humanitarian workers regarding protection. OHCHR and DPA will participate more actively in trainings and performance appraisals for resident and humanitarian coordinators. They will also second human rights advisers as well as peace and development advisers to the office of the resident/humanitarian coordinator. UNDG will introduce a talent management track to identify and support qualified resident coordinators who can be deployed to conflict situations.

Second, the documents provide detailed information about how some of the proposed processes would function, including the development of the protection strategy. In order to implement the necessary problem analysis, the protection cluster, supported by inter-cluster coordination and information management systems, would collect credible and impartial information on the most serious rights violations and assess protection risks. OHCHR would provide support by, for example, drawing on a proposed global database on trends of rights violations. The protection

84 Ibid.

85 In support of these goals, the Human Rights up Front initiative devised new headquarters support mechanisms. UN (2014) "Rights Up Front" Detailed Action Plan.

cluster would regularly share its analysis with the UN country team (UNCT) and the humanitarian country team (HCT). Safe and confidential channels are established to share information. Risk mitigation measures are put in place to preserve the safety and security of sources of information. On this basis, the protection cluster would develop a comprehensive protection strategy – with a prominent advocacy element – that is adopted by the HCT. UN OCHA and the protection cluster would also review inter-agency planning documents (e.g., flash appeals) to ensure that protection concerns are properly reflected in those documents.

The documents, however, do not specify the processes for implementing the strategy and monitoring and evaluating its implementation. The IASC protection policy that is currently under development may provide further information on these aspects, but no drafts of the policy were available at the time of this study.

While the Substance of the Reform Remains in Dispute, Related Processes Have Already Been Implemented

While the scope of this study did not allow for a detailed assessment of the reform's implementation, a central finding of the 2015 whole-of-system review of protection was that key actors continue to question whether IASC members have a responsibility to engage directly with duty bearers and often posit that "they do not have a role to play in countering abusive or violent behavior".[86] This strongly suggests that humanitarian actors have yet to collectively adjust to the reform's basic propositions and aims.

However, several processes outlined by the protection reform have already been implemented. Humanitarian country teams in South Sudan and Syria, for example, have adopted protection strategies. In the Syria response, an inter-agency task force drew up a UN-wide protection strategy integrating humanitarian, development and political approaches. Human rights advisers from OHCHR are supporting the regional humanitarian coordinator's office in Amman, Jordan. The HCT reached out in private to permanent members of the UN Security Council to raise concerns about allegations of rights violations. The Global Protection Cluster and the humanitarian coordinator in Damascus issued statements and alerts, which, however, refrained from naming perpetrating parties.[87]

Thought Experiment: What If the Reform Were Fully Implemented?

What do these reform suggestions mean? In this section, we conduct a thought experiment that assumes all reform suggestions are fully implemented. We posit that this would imply the following changes to the humanitarian system:

86 Niland, N. et al. (2015) Independent Whole of System Review of Protection in the Context of Humanitarian Action.

87 Paul, D. (2016) The Global Protection Cluster alert on Aleppo: Too little and too late; El Hillo, Y. and Kennedy, K. (2016) Joint Statement on Hard-To-Reach and Besieged Communities in Syria.

1. **Increased capacities and appropriate processes for analysis, strategy development and advocacy are in place.** A high-quality humanitarian protection strategy builds on strong analysis of risks and vulnerabilities; aims to put a stop to critical rights violations; identifies duty bearers and other powerbrokers; and has an explicit theory of change that also sequences different modes of advocacy, including persuasion, mobilization and denunciation. More capacity than currently available will be necessary to conduct the relevant analysis, draft the strategy and implement advocacy. While local advocacy leads are expected to conduct analysis at the local level (see next point),[88] the protection cluster is expected to synthesise the local analyses. An expert (e.g., ProCap) could be assigned to draft the strategy based on this, as well as other, external analyses. Humanitarian coordinators and the protection cluster will be responsible for undertaking advocacy efforts at the national level. For this, the office of the humanitarian coordinator will require greater analytical capacity, i.e., direct advisers in addition to the current mechanisms for staff secondments from ProCap and the rosters of DPA and OHCHR, who would also liaise with the protection cluster. The enhanced protection responsibilities would also need to be reflected in the performance assessment and career management of humanitarian coordinators.
2. **Specific organisations are appointed to lead local advocacy.** For local advocacy to be effective, humanitarian organisations need consistent messaging, organisational and personal credibility, strong operational presence to give weight to their messages and a credible potential threat of withdrawal – the ultimate bargaining chip.[89] A single organisation as the advocacy lead in any given area would make advocacy efforts more effective and more efficient: it would be in a much better place to adopt consistent positions and messages vis-à-vis armed groups; it would provide armed groups with a clear counterpart; and it would make it more cost-efficient to establish effective networks with local power holders and armed actors and to closely monitor rights violations.

   Ideally, the organisation that has the best operational presence and network with local stakeholders should be appointed as local advocacy lead. Since UN staff safety and security regulations often do not allow for sufficient field presence, international NGOs are more likely to become local protection advocacy leads in insecure areas. Since significant upfront investments in staff rosters and advocacy capacity are required for potential advocacy leads, only a relatively small number of qualified organisations are likely to become local advocacy leads. Developing transparent and credible mechanisms for selecting local advocacy leads will be central to the success of the reform effort.

88 Based on the ICRC's experiences, approximately one international and one national staff per district would be necessary for local analysis and advocacy. To enable this, local advocacy leads might need to create rapid deployment mechanisms, such as an internal roster of staff willing to work in the deep field and able to negotiate with warring parties.

89 Mancini-Griffoli, D. and Picot, A. (2004) Humanitarian Negotiation. A Handbook for Securing Access, Assistance and Protection for Civilians in Armed Conflicts. See also Mack, M. (2008) Increasing Respect for International Humanitarian Law in Non-international Armed Conflicts.

3. **Advocacy leads face additional risks.** Protection advocacy requires strong field presence and raises contentious issues. This is likely to increase the security risks for staff members of the local advocacy lead organisations. Lead organisations also face an increased risk of being expelled.
4. **Longer-term funding is made available to key protection actors.** Protection advocacy requires long-term investments to ensure a continuous presence, which is necessary to develop and nurture contacts, and to build mutual understanding and trust. Consulted experts suggested at least three-year-long planning cycles supported by, for example, rolling budgets, as seen in the development sector. Protection advocacy might benefit from the longer-term and more flexible funding that will be made available through the "grand bargain". The UN secretary-general's report for the World Humanitarian Summit also suggests the expansion of the Central Emergency Response Fund from $500 million to $1 billion by 2018.[90] This might also have positive effects on protection advocacy because pooled funds have been found to be significant donors for protection (in approximately the same proportion as bilateral donors, at 3 to 4 percent of all humanitarian spending).[91]
5. **Advocacy leads will expand their programmes.** Once appointed, local advocacy lead organisations will be well-positioned to further increase their assistance and specialised protection programmes, as this would strengthen their ability to negotiate and advocate. Since we expect only a relatively small number of organisations to be eligible as local advocacy leads, the protection reform would likely lead to a consolidation of actors that will mostly affect protection actors.
6. **Joint operating principles for humanitarian country teams with monitoring and enforcement mechanisms are created.** Alongside the advocacy activities of the humanitarian coordinator, the protection cluster and local advocacy leads, other humanitarian organisations will continue to provide assistance and specialised protection services. These activities will need some consistency to ensure that they support and do not undermine the collective advocacy effort. This could be achieved through joint operating principles for all members of the humanitarian country team, as is the case today in Syria, for example.[92] A new monitoring and enforcement mechanism that regularly reviews members' compliance will help ensure stronger adherence to the principles.

90 UNGA (2016) One humanity: shared responsibility. Report of the Secretary-General for the World Humanitarian Summit.

91 Murray, J. and Landry, J. (2013) Placing Protection at the Centre of Humanitarian Action. Study on Protection Funding in Complex Humanitarian Emergencies.

92 UN OCHA (2014) Joint Operating Principles. Protocol for Engagement with Parties to the Conflict to deliver Humanitarian Assistance in northern Syria.

Illustration 19: Full implementation of protection advocacy

THE REFORM PROPOSAL

- Humanitarian actors prioritise advocating for a stop to human rights violations.
- The HC and the protection cluster have direct responsibility for advocacy.
- UN OCHA supports advocacy efforts.
- Humanitarian country teams adopt a protection strategy.
- The resident coordinator adopts a UN-wide protection strategy.

...FULLY IMPLEMENTED

- Increased capacities for analysis, strategy development and advocacy
- Appointment of local advocacy leads
- Additional risks for advocacy leads
- Longer-term funding for key protection actors
- Expansion of programmes for advocacy leads
- Joint operating principles with monitoring and enforcement mechanisms for humanitarian country teams

Stakeholder Self-Interests and Power to Affect the Reform

Like all reform efforts discussed in this paper, the protection reform was suggested because it is assumed to result in better assistance to people affected by crises. But it is important to note that the reform effort also affects the self-interests of donors, recipient governments, operational organisations and humanitarian coordinators. This section summarises which stakeholder groups are expected to "win" and which are expected to "lose" through the reform's implementation, and examines the power they have to promote or obstruct the reform. While affected people will clearly benefit from the reform, their ability to affect the reform is negligible; therefore, we will not discuss their interests in detail below.

Donors

Past role: In 2012, the estimated amount spent on humanitarian protection globally was less than US$500 million – that is, less than 4 percent of all humanitarian expenditure. With mine action, the figure still remains below 10 percent. A 2011 field survey supports the general perception that so-called Nordic donors are relatively greater contributors to humanitarian protection than others. Others, such as DFID, are less visible contributors to humanitarian protection because they provide unearmarked contributions and grants to pooled funds.[93] Through their support to partners, most traditional donors already contribute to advocacy-related efforts within the IASC (and, through funding the ICRC, also beyond the IASC). However, the current funding and protection policies of traditional donors rarely mention protection advocacy as a priority area for humanitarian action. Of the three major humanitarian donors, only DG ECHO explicitly expresses an expectation that humanitarian actors undertake protection advocacy and convince perpetrators to change their behaviour.[94]

93 Murray, J. and Landry, J. (2013) Placing Protection at the Centre of Humanitarian Action. Study on Protection Funding in Complex Humanitarian Emergencies.

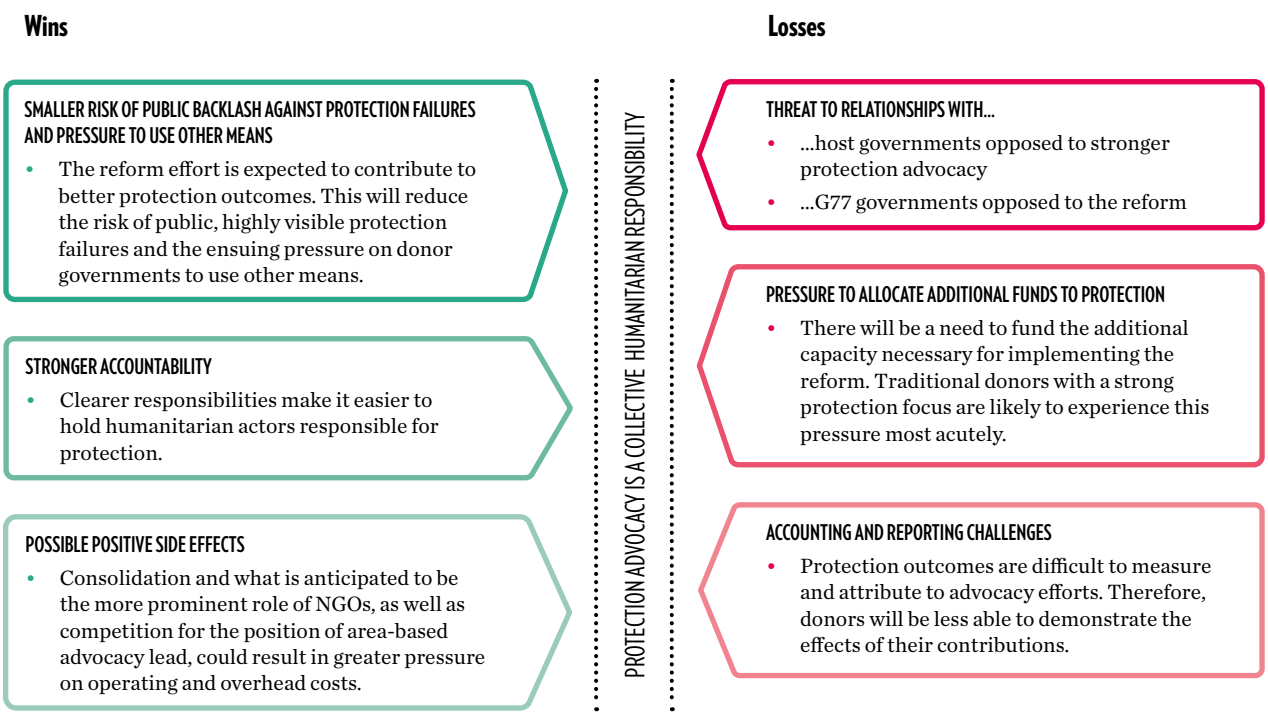
94 DFID (2011) Saving Lives, Preventing Suffering, and Building Resilience: The UK Government's Humanitarian Policy; DG ECHO (2009) Humanitarian Protection. DG ECHO's funding guidelines; USAID (2013) Guidance for Protection & Code of Conduct Requirements; BPRM (2009) Protection Policy.

Power to affect the reform: Donors hold significant power to ensure that the reform is implemented. They could influence the ongoing drafting process of the IASC policy on protection – for example, by developing and piloting a mechanism to appoint area-based advocacy leads. Donors can also support the reform's full implementation by financing the capacity expansion of potential area leads, protection clusters and humanitarian coordinators.

Self-interests: Humanitarian protection failures in contexts like Sri Lanka and Syria have led to very bad press for the international humanitarian system and put pressure on governments to employ other means. Therefore, donors will win through the reform in so far as it contributes to improved protection outcomes. If fully implemented, the reform would also create stronger accountability for protection advocacy. Changes to traditional power relations might also result in welcome pressure on operating costs. At the same time, donors interested in promoting the reform will need to contend with potential pushback from host governments opposed to the reform and G77 governments, some of which might see stronger protection advocacy as undermining state sovereignty. Donors will also need to increase their funding for protection, despite the usual difficulties of measuring protection outcomes and of justifying related funding decisions.[95]

95 For an alternative view, see InterAction's results-based monitoring framework: InterAction (n.d.) Key Elements of Results-based Protection. A key element is a necessary action to achieve measurable results.

Illustration 20: Wins and losses for donors



Donors are expected to win from the implementation of the protection reform.
They have significant power to drive the reform forward and shape it in a positive way.

Host Governments

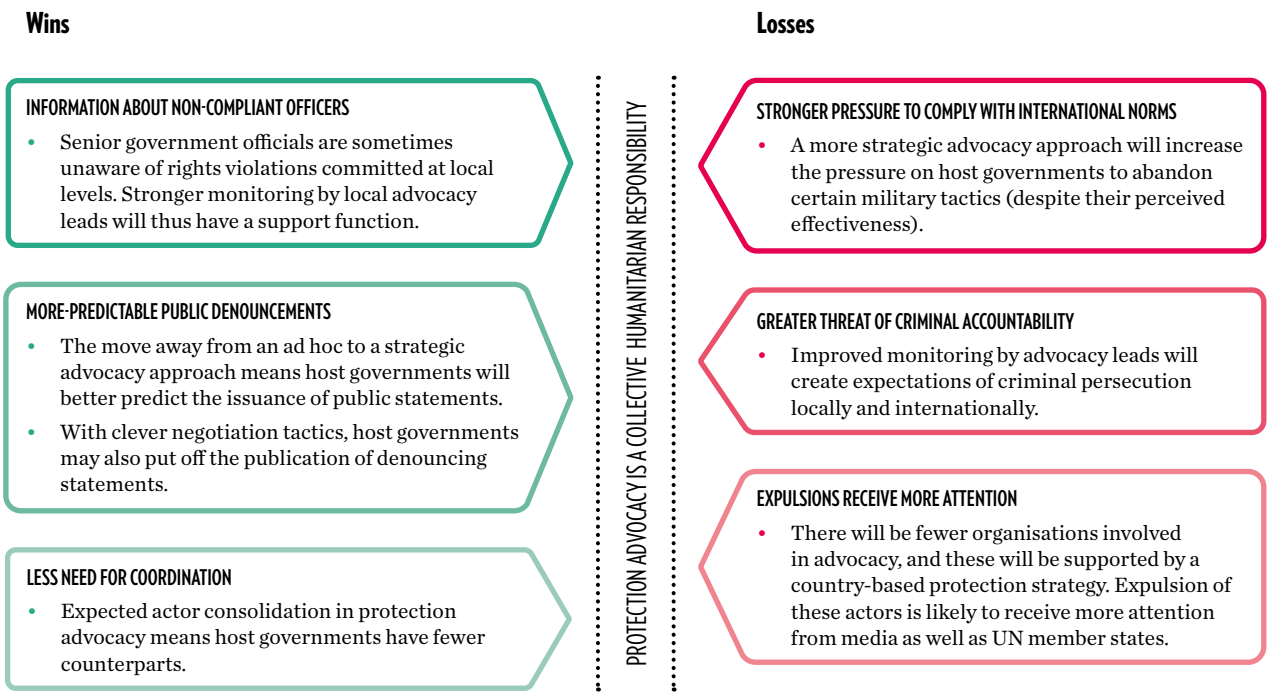
Past role: The primary responsibility to protect people lies with governments (and with armed non-state actors, in the case of non-international armed conflicts). While the model applies to all emergencies, it is most relevant in armed conflicts and other situations of violence. In these contexts, host governments are often parties to the conflict. Therefore, humanitarian actors undertake protection advocacy to improve the compliance of host governments with the relevant bodies of law, at times by publicly denouncing warring parties. As a result, host governments have often attempted to block a more strategic approach to protection advocacy. Most recently, in Syria, the UN allegedly "altered dozens of passages and omitted pertinent information to paint the government of Bashar al-Assad in a more favourable light".[96]

Power to affect the reform: Host governments hold great power to block the reform. They can deny entry to individuals, retract operating licenses and, in extreme cases, intimidate or expel individuals or entire organisations.

Self-interests: Host governments in conflict-affected countries are clearly poised to lose from the reform. Among the few benefits, a more strategic protection advocacy might bring to light information about non-compliant officers at the local level, whose actions the government genuinely disapproves of. Host governments would also benefit from the predictability of the strategic advocacy approach: the government would better predict when advocacy leads will issue denouncing statements upon the failure of private negotiations. At the same time, host governments would face stronger pressure to comply with norms (especially when external actors are also mobilised) and a greater threat of criminal accountability as a result of the model's strong monitoring and reporting practices. Moreover, the country-based protection strategy will provide institutional backing for organisations and individuals involved in advocacy. The cost of their expulsion would thus rise for host governments.

96 Gutman, R. (2016) How the U.N. Let Assad Edit the Truth of Syria's War.

Illustration 21: Wins and losses for host governments



Host governments in conflict-affected countries will lose from the reform. They have strong power to obstruct the reform, especially through the expulsion of individuals or organisations.

Area-Based Protection Advocacy Lead Agencies

Past role: This study is the first to propose the idea of area-based protection advocacy. As described in the first chapter, IASC members subscribe to different definitions of humanitarian protection, and not all protection cluster members consider advocacy to be part of their role. Importantly, there have been only sporadic attempts to elevate protection advocacy to the inter-agency level. Examples include joint NGO statements and policy briefs that advocate for greater compliance with international humanitarian law.[97] Anecdotal evidence suggests that humanitarian actors also undertake joint advocacy with duty bearers in private (e.g., in South Sudan). These efforts, however, are not systematic.

Power to affect the reform: Potential advocacy leads, namely international NGOs and the UN (in secure environments), hold some power to ensure the reform's full implementation. Considering the weight of UNHCR and UNICEF in all protection matters within the IASC, their buy-in to the reform will be essential for its implementation.[98] They can become either strong brokers for reform or dilute and spoil related efforts.

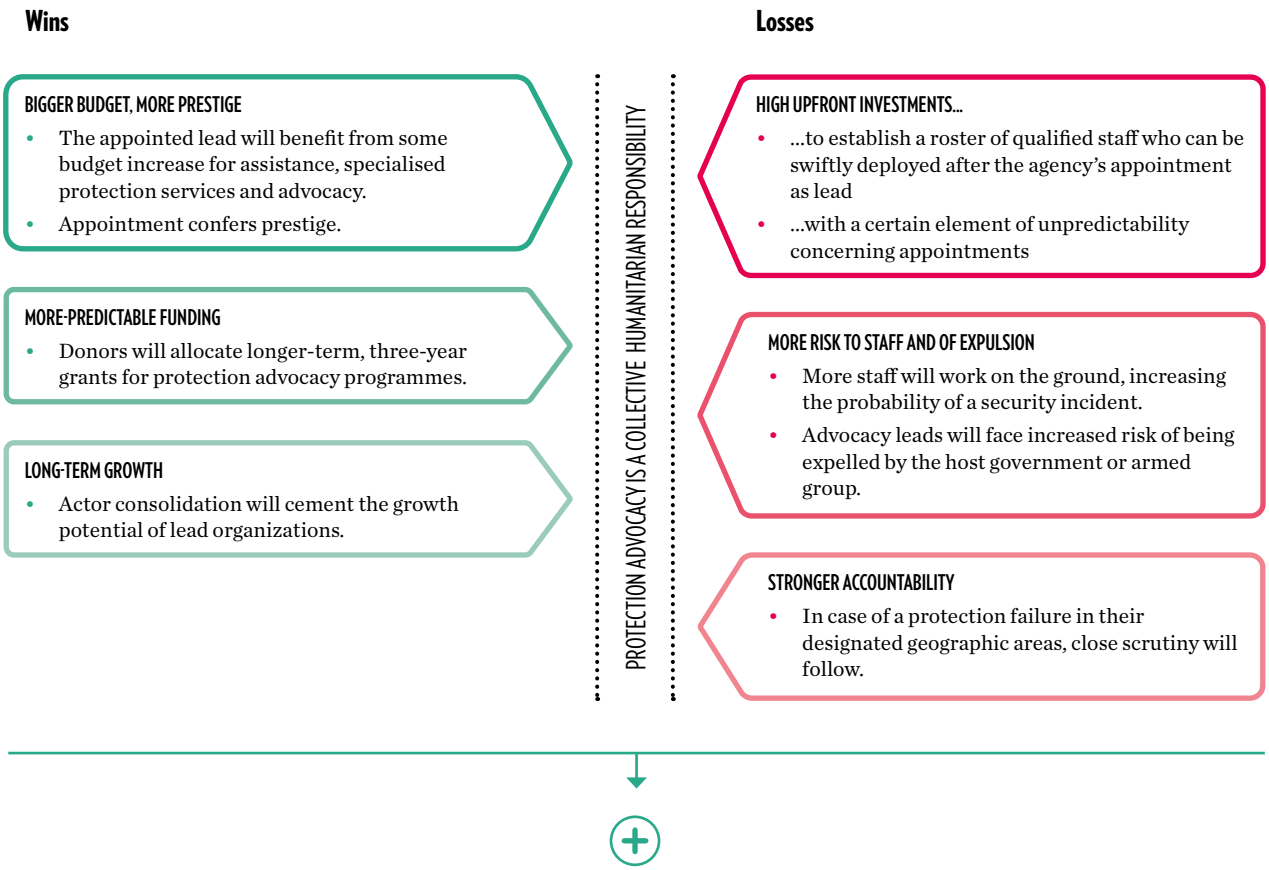
Self-interests: Potential area-based protection leads are expected to win from the implementation of the reform. The budget of lead agencies, when and where appointed, is expected to increase. Moreover, as appointments will likely be longer-term and matched with three-year grants in order to be effective, advocacy leads will benefit from related predictability in planning. High up-front investments mean that new actors face a high barrier to becoming potential advocacy leads. Advocacy leads will also contend with greater physical risk to their staff and the risk of expulsion.

Though the reform suggests a budget increase for the lead agency to the detriment of others, this will not translate into significant changes in budgets at the level of individual organisations. Therefore, non-lead opposition to the reform from protection cluster members and beyond is likely to be modest.

97 See, for example, InterAction (2016) Civilians Under Fire Restore Respect for International Humanitarian Law.

98 The ICRC, UNHCR and UNICEF receive about 75 percent of all available protection funding. Murray, J. and Landry, J. (2013) Placing Protection at the Centre of Humanitarian Action. Study on Protection Funding in Complex Humanitarian Emergencies.

Illustration 22: Wins and losses for area-based protection advocacy leads



Area-based protection advocacy leads are expected to win from the reform. Large international NGOs are the strongest candidates for advocacy leadership. The UN and smaller NGOs will likely have fewer opportunities, due to security procedures and operational capacity, respectively. They have some power to promote the reform and significant power to obstruct it.

Humanitarian Coordinators

Past role: Humanitarian coordinators have engaged in advocacy to varying degrees. The 2011 Transformative Agenda added clear responsibilities for humanitarian coordinators in level-3 crises: "In most instances, the HC will lead the advocacy activities on behalf of the HCT".[99] While this demand on the humanitarian coordinator mainly concerns issues related to access, our research on the implementation of the Transformative Agenda revealed that a number of humanitarian coordinators perceived stronger pressure to speak out on rights violations, and some did so. At the same time, "there were no new systems in place for rewarding such leaders, either in terms of promotion or automatic UN statements expressing support for them. Support from headquarters varied, and the performance of double- or triple-hatted HCs continued to be reviewed against competing expectations and priorities, such as the strengthening of relations with the host government".[100] Indeed, when double- or triple-hatted, the humanitarian coordinator is responsible for striking a balance between different UN priorities. However, the Human Rights up Front initiative has created headquarters and regional mechanisms to support humanitarian coordinators in this and, more generally, in their advocacy work.[101] Considering that all HCs, whether single-, double- or triple-hatted, are subject to the Human Rights up Front's premise of elevating rights above other considerations, we do not differentiate between them in the subsequent section.

Power to affect the reform: Humanitarian coordinators have little power to push the reform forward because they are mostly absent from relevant discussions. However, if humanitarian coordinators do not buy in to the benefits of the reform, they can "vote with their feet" and decline assignments in armed conflicts and other situations of violence where the reform's effects would be most pronounced. The current difficulty of attracting humanitarian coordinators to the HC pool demonstrates their power to potentially block the reform.

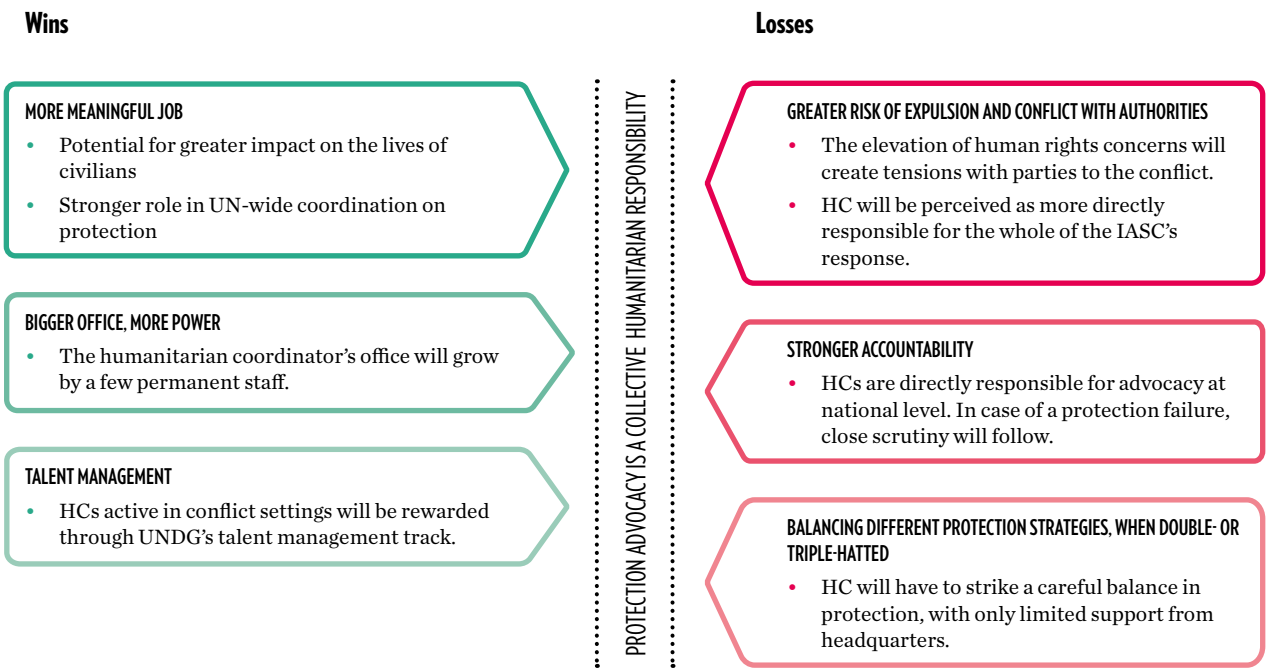
Self-interests: Whether humanitarian coordinators will win or lose from the reform depends on their personal preferences. Those invested in protection issues will highly value that their job has become more meaningful and that they receive institutional support to undertake advocacy work, from added capacity to their office, to rewards through the UNDG talent management track. According to their calculation, these benefits will outweigh potential downsides, including stronger accountability and a greater risk of expulsion. But humanitarian coordinators with a more "developmental" mindset – that is, those who attach more importance to the quality of relationships with state authorities – will likely perceive the reform as creating unnecessary conflict with government partners and will feel uneasy playing a central role in that conflict.

99 IASC (2014) 1. Empowered Leadership. Transformative Agenda Protocol.

100 Krueger, S. et al. (2016) IASC Transformative Agenda. A review of reviews and their follow-up.

101 For example, UNDG regional team chairs and DPA regional division directors convene quarterly meetings to discuss preventive measures; and when needed, an inter-agency task force (co-chaired by DPA and UNDG regional chair) and a principal-level Senior Action Group (chaired by UN Deputy Secretary-General) provide support. UN (2014) "Rights Up Front" Detailed Action Plan.

Illustration 23: Wins and losses for humanitarian coordinators



How humanitarian coordinators weigh the wins and losses of the reform will depend on their personal preferences. They can spoil the reform effort by "voting with their feet" and rejecting postings in conflict settings.

Policy Implications

The humanitarian protection reform initiated by the 2013 statement on the centrality of protection is in an early and fluid state. The consequent inter-agency process resulted in the whole-of-system review of protection in 2015 and the drafting of the first IASC policy on protection. But it remains unclear when the policy will be published. At the same time, two of the five core responsibilities in the secretary-general's report for the World Humanitarian Summit address protection in humanitarian crises. The report's explicit language in support of the proposed reform demonstrates a resolve to maintain its momentum.

The overall chances of the reform's full implementation are moderate. Donors, potential advocacy leads and humanitarian coordinators with a rights-advocacy profile stand to win from the implementation of the reform and are thus likely to support it.

They will, however, face strong opposition from host governments in conflict-affected countries. Donors should work with other government departments to mitigate related risks. Opposition from non-lead agencies and humanitarian coordinators with a development profile will be modest. Given the power of cluster and sub-cluster lead agencies to obstruct the reform, it will be crucial to manage a consultative process with them in order to ensure their buy-in to the reform.

Consequently, donors play a very important role in ensuring that protection advocacy becomes a collective humanitarian responsibility. The analysis above has clear policy implications for donors.

First, there currently exists a window of opportunity to shape the details of the planned reform. Our model developed above suggests that the reform would be most effective if there is a clear division of responsibilities, with individual organisations designated advocacy leads for different areas.

1. Donors should promote the idea of designating individual organisations as area-based protection advocacy leads and support the development of a transparent and competitive mechanism for assigning lead roles.

Second, several measures could help ensure that as many donors as possible support the protection reform:

2. Expand the evidence base showing that enhanced protection advocacy can help avoid dramatic protection failures and related public backlash and pressure to use other means (e.g., military intervention).
3. Work with other government departments to mitigate expected pushback from host governments and G77 countries.

Finally, the following measures would help donors take the interests and incentives of other stakeholders more into account:

4. Work with potential advocacy leads to promote the reform. Donors can support them in setting up related capacity mechanisms (e.g., staff rosters) and in their advocacy work to mitigate risks of expulsion and/or the financial consequences of expulsion. Donors should also provide longer-term funding for protection advocacy.
5. Manage a consultative process with UN actors mandated with protection to ensure their buy-in to the reform. For example, stress the sustained relevance of the protection cluster in national-level protection advocacy, and clarify the links between area-based leads and the protection cluster.
6. Make clear investments in the HC pool, and ensure that humanitarian coordinators with a stronger rights-advocacy profile are included in the pool and deployed to conflict settings.

Conclusions

The preceding chapters examined reform efforts related to three central aspects of humanitarian assistance: cash transfers, accountability to affected populations and protection. For each area, we developed a thought experiment to explore how the humanitarian system would change if the reform proposals were fully implemented. We analysed how these changes would affect the interests and incentives of key stakeholders, and laid out the resulting policy implications for donors.

Overall, there are more differences than commonalities between the three reform areas. Specifically, the reforms concern different aspects of the response, imply for the most part different changes for the humanitarian system and affect the interests of key stakeholders in different ways. Nevertheless, there are also some common patterns and trends.

Reform Concepts Are Unclear and Not Thought Through to the End

The strongest similarities relate to the very nature of the reform proposals. First, **definitions of key reform concepts are unclear**. The IASC definition of protection, for example, is criticised as being too broad to properly capture what protection actors currently do or should do. Consequently, what it means to implement the "centrality of protection" in practice remains unclear. The practical implications of accountability to affected populations are similarly vague. To some, AAP involves the voluntary effort of aid organisations to consult aid recipients. To others, it reflects the right of people in need to influence decisions that affect them, which implies a much higher level of involvement and decision-making power for beneficiaries. Even the seemingly straightforward concept of cash carries some confusion, as it does not only mean giving cash to beneficiaries. The term is also used for vouchers and conditional cash transfers (e.g., cash for work).

This lack of clarity has an important advantage: reaching consensus on a reform proposal becomes much easier. Each organisation can reach its own interpretation of the proposal and agree to it on the basis of that interpretation. As a result, rhetorical agreement often papers over substantial differences. These unresolved differences later make it more difficult to follow up on reform proposals and to ensure their implementation. This is a common phenomenon in world politics that is often described as "organised hypocrisy".[102]

102 See Brunsson, N. (1989) The Organization of Hypocrisy: Talk, Decisions and Actions in Organizations; Krasner, S. D. (1999) Sovereignty: Organized Hypocrisy; and Lipson, M. (2006) Organized Hypocrisy and Global Governance: Implications for UN Reform.

The second pattern across the three reform efforts is that **they rarely take interests and incentives into account**. The reform efforts are based on the assumption that humanitarian organisations do what is best for beneficiaries. This altruistic paradigm means that reform promoters typically focus on providing either evidence for what should be done[103] or technical guidance and capacity support to facilitate implementation of the reforms.[104]

Both of these steps are necessary and usually highly appreciated by humanitarian organisations. But they neglect to take into account a crucial factor: there may be other reasons why organisations do or do not fully buy into the reform effort. It is almost taboo to acknowledge the self-interests of humanitarian actors and to openly consider how reform demands might affect different stakeholders. As a result, the political aspects of humanitarian reform have remained a blind spot, and reform promoters do not use all available levers to achieve active implementation of the reform. This is where the present study seeks to make a contribution through its policy suggestions.

Finally, the **reform proposals are not thought through to the end**, and their full implications are typically not spelled out. We found little evidence of systematic reflection on the potential effects, including unintended side effects, of the reforms of the humanitarian system.[105] For example, cash programmes at scale are likely to increase the costs of non-cash programmes; real accountability to affected populations could exacerbate local tensions and conflict with humanitarian principles; and stronger protection advocacy will likely put field staff at greater risk.

POLICY IMPLICATION FOR DONORS: Donors should develop a holistic vision of change that outlines the systemic implications of the main reform proposals and defines priorities in cases where there are trade-offs between different reform scenarios.

Another result of the failure to think reform proposals through to the end is insufficient thinking on how the various reform proposals interrelate. Where do they mutually reinforce each other and add up to a coherent vision of change for the humanitarian system? Where do they contradict each other? Cash transfers, for example, strengthen accountability to affected populations, as they give aid recipients the power to decide on the allocation of resources. On the other hand, using cash as the default delivery option could make it more difficult for protection organisations to negotiate access, as they can no longer use their assistance programmes as a bargaining chip. Stronger accountability to affected populations would lead to more field presence of humanitarian workers and to greater satisfaction among aid recipients. This would make it easier to gain access and advocate for protection.

103 For AAP, this is based on an analysis of the shortcomings of current practice, as contained in SHCR (2010) Peer Review on Accountability to Disaster-Affected Populations; ALNAP (2013) Rhetoric or Reality? Putting Affected People at the Centre of Humanitarian Action; and Smith-Buchanan et al. (2015) Who's Listening? AAP in the Haiyan Response. For protection, besides country-based evaluations that considered protection programming, recent evaluations examined what works in protection, how it is funded and how it is working in practice. See, for example, Binder, A., Reichhold, U. and Niland, N. (2013) Scoping Study: What Works in Protection and How do We Know?; Murray, J. and Landry, J. (2013) Placing Protection at the Centre of Humanitarian Action; and Niland, N. et al. (2015) Independent Whole of System Review of Protection in the Context of Humanitarian Action. For cash, relevant evidence relates to the shortcomings of in-kind assistance, especially of food aid, and to the benefits of cash-based assistance. See, for example, Barrett, C. B. and Maxwell, D. G. (2006) Food Aid After Fifty Years: Recasting Its Role or the report of the High Level Panel on Humanitarian Cash Transfers.

104 This includes, for example, the creation of the Humanitarian Accountability Partnership (HAP) and, later, the CHS Alliance; support activities of the Global Protection Cluster; the Protection Standby Capacity Project (ProCap); the Cash Learning Partnership (CaLP) and the Cash and Markets Capacity Building Roster (CashCap); and countless technical guidance materials and toolkits.

105 A notable exception is the report of the High Level Panel on Humanitarian Cash Transfers, which did consider certain systemic effects of the shift to large-scale cash programming and used these anticipated effects as an additional argument to support the shift to cash.

The Humanitarian System Will Have Fewer Actors With a More Geographic Division of Labour

There are also some common patterns in the ways we expect the humanitarian system to change. First, all three reform efforts would require a **consolidation of the humanitarian actor landscape** as a result of working with fewer but larger organisations. Large-scale cash programmes are expected to be implemented by one lead actor or consortium in a given area. For accountability to affected populations, the intensive involvement of affected populations in humanitarian programming is only thinkable if communities interact with a limited number of organisations or a joint mechanism. Similarly, effective engagement of armed groups for protection purposes would require a clear humanitarian interface, and it is more realistic to build the necessary staff capacity for protection across a smaller range of organisations.

POLICY IMPLICATION FOR DONORS: The challenge for donors is to find ways to consolidate the international actor landscape (e.g., by competitively awarding contracts for large-scale cash programmes, by working with protection organisations to develop a mechanism for choosing local advocacy leads) while at the same time supporting the localisation of aid (e.g., by investing in pooled funds focused on supporting local organisations). This would also imply less support and funding for small NGOs based in donor countries.

While actor consolidation would make the humanitarian system leaner and reduce the need for coordination, it also involves downsides and trade-offs. Concentrating funding on fewer but larger organisations would reinforce the oligopolistic structure of the humanitarian system. This would increase the ability of central actors to extract rents. Actor consolidation would also make it more difficult for smaller, local organisations to participate in the response. Consequently, there is a trade-off between the effective implementation of the reform efforts and the declared aim of localising humanitarian responses.

Second, and relatedly, the reform efforts would require **stronger area-based, multi-sectoral approaches**, while weakening the relevance of single-sector activities, organisations and coordination fora. Shifting to cash at scale would imply that traditional sectors and clusters remain responsible for less than half of the total humanitarian portfolio in contexts suitable for cash programming. The remainder would be allocated to multi-sector cash programmes. Stronger accountability to affected populations would require humanitarian organisations to be able to react to the multi-faceted, changing needs of people – including their more development-oriented needs. In protection, one organisation would be designated the lead responsibility for engaging with local stakeholders in a given area, based on its network and operational capacity. A multi-sector organisation is more likely to have these attributes.

POLICY IMPLICATION FOR DONORS: Changing the role, size and relevance of sector-based UN agencies will require close cooperation between donor agencies and the political arms of their governments because adjusting the levels of assessed contributions and of the governments' general commitment to support agencies' funding requests might be necessary.

Multi-sector organisations will have to take on a greater role to meet the requirements of the different reform agendas. This also implies a reduction (or at least a change) in the role and relevance of the UN's sector-based agencies. A formal renegotiation of mandates might not be necessary, but changes in the role and size of various agencies will be.

Third, the reform efforts risk **increasing the inequity of humanitarian assistance**. The distribution of humanitarian resources is already highly unequal today. Political considerations strongly influence how much overall funding is allocated to each emergency response. As a result, the response is disproportionate to needs in the many so-called "forgotten" crises.[106] Within countries, assistance often centres on camps and neglects communities that are harder to reach.

106 See Binder, A., Koddenbrock, K. and Horváth, A. (2013) Reflections on the Inequities of Humanitarian Assistance: Possible Courses of Action for Germany, GPPi.

The reform efforts analysed in this study tend to reinforce this bias. With a large-scale shift to cash, non-cash programmes are expected to become more expensive. Therefore, there is a risk that cost-conscious organisations will increase their focus on populations with access to markets and cash-transfer mechanisms, rather than those requiring continued in-kind assistance. To achieve stronger accountability to affected populations, donors are expected to make their funding more conditional on the presence of good accountability mechanisms and the satisfaction of beneficiaries. Creating these mechanisms is much easier in camps and natural disaster settings. The accountability reform can thus strengthen the focus on this type of environment. Similarly, protection advocacy is more difficult in insecure contexts, where only a few organisations operate and activities might focus on easy-to-access areas.

POLICY IMPLICATION FOR DONORS: Donors should engage in an honest debate about the trade-offs between equity, cost-efficiency and the quality aspects promoted by different reform efforts. They should position themselves clearly and develop credible mechanisms for providing continued support in difficult operational contexts where interventions are less cost-efficient and the objectives of the various reform efforts are unlikely to be met.

It is important to note that these trends are not inevitable. But trade-offs need to be recognised, and they must be addressed by conscious, active strategies.

Finally, all three reform scenarios share an **increased emphasis on assessments and analytical work**. Cash programming requires market assessments and response analysis. Accountability to affected populations needs more analysis of local power structures and potential inter-community tensions. Strengthened rights-violation monitoring is a prerequisite of successful protection advocacy.

This entails changes to the typical profile of humanitarian field workers, who will need stronger process, analytical, negotiation and diplomatic skills. It also raises the question of where the analytical functions would be best placed. For cash, one could argue that an independent capacity to conduct market assessments and response analysis would be important to mitigate the conflicts of interests of operational organisations. For accountability to affected populations, direct relationships between implementers and communities are crucial, while holistic, external community communication programmes can also be beneficial in areas where a lot of organisations operate. In contrast, rights violation monitoring is a core activity of the protection portfolio and would need to be conducted by the protection lead organisation in a given area, with support from others.

POLICY IMPLICATION FOR DONORS: Donors should invest in stronger assessment and analysis capacities, mainly for operational organisations, but in some cases for independent or donor-related entities as well (e.g., market assessment and response analysis).

Those With the Greatest Power to Affect Reforms Are Often Not Those With the Strongest Interest in Their Success

Table 4: Overview of stakeholder power and self-interest in each reform area

	Shift to cash	Accountability to affected populations	Protection
Donors	Power ★★★ Self-interest +	Power ★★★ Self-interest –	Power ★★★ Self-interest +
Affected governments	*Governments with social safety nets:* Power ★★★ Self-interest + *Other governments:* Power ★★★ Self-interest –	Power ★★★ Self-interest ?	Power ★★★ Self-interest –
Humanitarian organisations	*Potential leads:* Power ★★☆ Self-interest + *Non-leads:* Power ★☆☆ Self-interest –	*Multi-sector organisations:* Power ★★★ Self-interest + *Single-sector organisations:* Power ★★★ Self-interest –	*Potential leads:* Power ★★☆ Self-interest + *Non-leads:* Power ★★☆ Self-interest –
Affected population	Power ★☆☆ Self-interest +	Power ★☆☆ Self-interest +	Power ★☆☆ Self-interest +

POLICY IMPLICATION FOR DONORS: Donors should use the scope provided by this heterogeneity to structure reform efforts in such a way that more organisations are likely to be among the "reform winners" – for example, selecting cash and protection leads on a competitive, area-by-area basis, rather than appointing a formal global lead organisation.

Donors should rely more on their diplomatic representations in host countries to explore likely government positions and, where appropriate, involve host governments in a discussion about them.

There should be a stronger effort to rally as many donors as possible behind key reform agendas. To do so, it is important to expand and communicate the evidence base on the expected effects of the various reform efforts. Donors should also explore various options for strengthening their collaboration – for example, joint investment into an externally managed pooled fund for cash programmes or a more explicit, geographic division of labour. Finally, other donor interests and incentives should be addressed more explicitly.

As the overview in Table 4 shows, donors are consistently one of the most powerful stakeholder groups. But the proposed reforms are only partially in line with their self-interests or, in the case of accountability to affected populations, even run counter to them. Therefore, active donor support for the reforms requires normative or political commitment. Host governments are another group with strong power; they are also the most dangerous potential reform spoilers. Whether they consider themselves winners or losers of a reform effort depends on many factors specific to the in-country situation – not least how strongly governments identify with "Western" values and institutions, since the reform areas resonate strongly with the classic canon of market economy, representative democracy and the rule of law. The interests of humanitarian organisations are heterogeneous. On the whole, large and multi-sector organisations are more likely to be among those benefitting from the reform efforts, whereas effects on the interests of small and/or single-sector organisations are more likely to be negative.

The overview of interests and incentives, combined with an analysis of the power of different stakeholders groups to block or promote reform efforts, also provides an indication of the likely success of the three reform efforts. Cash offers the most positive scenario: donors and potential cash lead organisations have an interest in, and the power to, promote the reform, especially if operational humanitarian organisations perceive the shift to cash as inevitable. Only affected governments could prevent the implementation of the reform, but only on a country-by-country basis.

In protection, the scenario is more mixed. In cooperation with donors, potential protection lead agencies would have both the incentive and much of the power to drive the reform forward. However, they would need to ensure that the interests of powerful potential spoilers, especially protection-mandated UN agencies, are accommodated. Affected governments are also very influential in this reform scenario, and their interests clearly run counter to the reform.

Though it is one of the most popular and broadly accepted normative goals of humanitarian reform, accountability to affected populations likely faces a coalition of the unwilling. A system-wide shift to stronger AAP is thus only thinkable if key stakeholders have a normative or political commitment to this reform that is so strong, it outweighs their self-interests.

Interestingly, not only is the cash reform most likely to succeed, but it would also entail the biggest changes to the current allocation of power and resources in the humanitarian system. Large-scale cash programmes would put the power of deciding the goods and services provided through humanitarian aid into the hands of aid recipients and signal the shift from a supply-driven to a demand-driven system. As Barnett and Walker (2015) have argued, the club of humanitarian elite players is usually good at perpetuating and reinforcing its grip on power and resources.[107] Therefore, it is perhaps unsurprising that the shift to cash is the only reform not initiated or driven by the central seat of the club, the IASC, and that it arose instead from the local decisions and actions of humanitarian field workers.

POLICY IMPLICATION FOR DONORS:
Donors should consider giving priority to supporting the cash reform as a comparatively low-hanging fruit that has positive synergies with other reform areas.

107 See Barnett, M. and Walker, P. (2015) Regime Change for Humanitarian Aid. How to Make Relief More Accountable, Foreign Affairs Vol. 94, No. 4.

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Annex 2: Interviewees

Experts Consulted on Cash-Based Assistance

Name	Position	Organisation
Sarah Bailey	Secretariat Manager and Technical Expert	High Level Panel on Humanitarian Cash Transfers/ODI
Linn Bogsnes Miles	CashCap Advisor	Norwegian Refugee Council
Daniel Fueger	Head of Economic Security Unit (Ad Interim)	ICRC
Paul Harvey	Technical Expert	High Level Panel on Humanitarian Cash Transfers/ODI
Loretta Hieber Girardet	Chief, Inter-Cluster Coordination Section	UN OCHA
Matthew Keyes	Team Leader Food and Nutrition, Specific Thematic Policies Unit	DG ECHO
Waheed Lor Mehdiabadi	Head of Cash-Based Interventions Section	UNHCR
Nick Maunder	Independent Consultant	-
Tahir Nour	Chief Market Access Programme Unit	WFP
Tim Waites	Senior Disaster Resilience and Livelihoods Advisor (CHASE)	UK DFID
Jake Zarins	Associate Director, Disaster Risk Reduction Response and Field Operations	Habitat for Humanity

Experts Consulted on AAP

Name	Position	Organisation
Ester Dross	Independent Consultant, AAP, Gender, Child Protection and PSEA	-
Isabella Jean	Co-Director	CDA Collaborative Learning Projects
Andy Wheatley	Humanitarian Advisor, Accountability & Results Monitoring (CHASE)	UK DFID
Barb Wigley	Independent Consultant, AAP	-

Experts Consulted on Protection

Name	Position	Organisation
Jenny McAvoy	Director of Protection	InterAction
Julian Murray	Independent Consultant	Julian Murray Consulting
Norah Niland	Research Associate	Graduate Institute Geneva
Patrick Rooney	Humanitarian Action Unit, Emergency Response Section, Field Operations and Technical Cooperation Division	OHCHR
Paul White	Senior Protection Officer, Adviser to the Regional Humanitarian Coordinator	On mission with OCHA Regional Office for the Syria Crisis

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