DEVELOPMENT OF MECHANISM FOR ACCOUNTABILITY TO THE AFFECTED POPULATION IN RAPID RESPONSE

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ABBREVIATION

AAP	Accountability to Affected Population
CEA	Community Engagement and Accountability
CHS	Core Humanitarian Standard
CRM	Complaint Response Mechanism
DDM	Department of Disaster Management
DME	Design, Monitoring and Evaluation
ECB	Emergency Capacity Building
FCRM	Feedback and Complaint Response Mechanism
GAP	Global Accountability Project
HAP	Humanitarian Accountability Partnership
HCTT	Humanitarian Coordination Task Team
IASC	Inter-Agency Standing Committee
IFRC	International Federation of Red Cross Red Crescent Societies
IGD	Interactive Group Discussion
JNA	Joint Needs Assessment
KII	Key Informants Interview
M&E	Monitoring & Evaluation
NAWG	Needs Assessment Working Group
NGO	Non-governmental Organisation
NIRAPAD	Network for Information, Response And Preparedness Activities on Disaster
PROSHAR	Program for Strengthening Household Access to Resources
PSEA	Protection against Sexual Exploitation and Abuse
PWDs	Persons with Disabilities
SFB	Start Fund Bangladesh
SHAPE	Strategic Humanitarian Assessment and Participatory Empowerment
ToR	Terms of Reference
UN	United Nations
UNOPS	United Nations Office for Project Services
UP	Union Parishad

EXECUTIVE SUMMARY

The report presents a framework for accountability to affected population in rapid response. Humanitarian actors play an important role in disaster response in Bangladesh. They have set out standard, deliver basic lifesaving support, transitional and recovery support, and coordinate disaster response for the disaster affected people. As such, their decisions and actions can have a profound effect on the daily lives of disaster affected people. But how the affected people hold the humanitarian agencies to account for their actions? The accountability framework being used by different humanitarian agencies are different and to some extent inadequate to hold humanitarian agencies accountable to the affected people in rapid response. Affected people lack an effective voice in the decision-making process of the humanitarian agencies. Hence, new tools and mechanisms are therefore needed at local and national level to make the humanitarian actors more accountable to affected people and communities. In view of this, SFB requests a review of existing accountability framework and develop a new framework for accountability to the disaster affected people.

The aim of this report is to broaden understanding of and commitment to common principles of accountability across the humanitarian agencies. It also seeks to map out and analyse the elements exist in different accountability framework in order to develop a common framework for accountability to disaster affected population. The task for creating a more accountable and responsive system is complex. Accountability is not a theoretical pursuit; it is about holding power to account and enabling affected people to put into the decisions affecting them in their daily lives. Unless humanitarian agencies are able to find ways of creating broad, informed participation of affected population and relevant stakeholders in decision-making process, their response to address the needs and priorities will fail.

At the heart of this report is a framework based on the learning from accountability practices that defines accountability is process through which the humanitarian agencies make commitment to respond to and balance the needs of affected people and stakeholders in its decision-making process and activities, and deliver against that commitment. Although this common framework is developed for the SFB Member Agencies, this can be used by other humanitarian agencies.

AAP Concept

Different agencies conceptualized AAP differently, such as

- IFRC cited accountability as the means by which individuals and organisations report to a recognized authority, or authorities, and are held responsible for their actions[1].
- The Global Accountability Framework Project by One World Trust define accountability as the processes through which an organisation makes a commitment to respond to and balance the needs of stakeholders in its decision-making processes and activities.
- HAP International in 2010 defined accountability as 'the means through which power is used responsibly, it is a process of taking into account the views of, and being held accountable by, different stakeholders, and primarily the people affected by authority or power.

Available AAP Framework
Desk research of published secondary documents identified the existence of a range of APP framework for humanitarian interventions. The study team identified the following framework are prominent for

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[1]Edwards and Hulme 1995, quoted in ALNAP, 16.

demonstration accountability to affected population. It is clear that some elements of accountability are common in the AAP framework being used by different agencies. They are (i) transparency, (ii) participation, (iii) complaint and feedback mechanism.

- **ECB project framework:** The Framework focuses on five key elements to improve and increase their accountability in humanitarian response, such as (a) leadership, (b) transparency, (c) feedback, (d) participation, and (e) design, monitoring and evaluation.
- **IASC AAP Framework:** In December 2011, the IASC principles have endorsed the following five commitments on Accountability to Affected Population: (a) leadership/governance, (b) transparency, (c) feedback and complaints, (d) participation, (e) design, monitoring and evaluation.
- **IFRC Framework:** In 2011, IFRC applied four principles developed by the One World Trust's Global Accountability Project (GAP) in their humanitarian programme review for Indonesia, Haiti and Pakistan. The principles are (a) transparency, (b) participation, (c) monitoring and evaluation, (d) complaints and response mechanism.
- **BBC Media Action Framework:** BBC Media Action focuses on four aspects of humanitarian accountability. This includes (a) beneficiary selection, (b) information provision, (c) participation, and (d) complaints and feedback.

Major Gaps in Existing AAP Practices in SFB Member Agencies

Analysis of existing AAP practices in SFB member agencies reflected that

- The difference between international and national NGOs are explicit when it comes to the policy and practice related to accountability. However, most of the tools being used by both international and national NGOs are focused on the feedback and complaint response mechanism which is underpinned by the humanitarian donors' conditions.
- Most of the organisations assign a focal person who deals with the complaint and response issues as an additional responsibility while a few organisations have dedicated department and staffs to implement complaint response mechanism. Thus, a majority of the organisations combined their complaint and feedback mechanism for both development and humanitarian programming into one policy and tools which at times are difficult to apply in the rapid response context.
- Information and communication flow to communities is weak. The SFB member agencies share variety of information with the community throughout the humanitarian program cycle using different tools. But there is no uniform or standard tool that they use for information sharing with the vulnerable communities and stakeholders.
- Affected people's influence in decision-making is not clear. One of the major capacity gaps of the front-line staffs is that they cannot clearly delineate the objectives and activities relating to accountability to affected population. This capacity gap attributed to a lack of clear guideline and comprehensive orientation to the front- line staffs on accountability to affected people.
- Feedback mechanisms are in place in most of the organisations but least functional. AAP has become 'Box Ticking exercise' in the backdrop of a weak certification process.
- Humanitarian community is suffering from chronic amnesia about use of lessons. They do not document lessons learnt from the previous evaluation. A lot of discussions are held and consensus are built on some important issues, but it is often seen that the discussions on same issues are held repeatedly.

Proposed AAP Framework for Rapid response

Analysis of the existing frameworks provided the basis for developing the AAP framework. The framework shows how the four accountability elements are intrinsically linked with three different perspectives such as humanitarian imperative, organisational capacity, and rapid response which promote accountability to affected population. The framework recognizes that the humanitarian principles shape the organisational capacity integrating three key elements such as governance and leadership, influence, and preparedness and response. There is difference in capacity of international, national and local organisations.

The rapid response to disaster mainly shaped by some common elements such as need analysis, funding commitment, project design, implementation, and peer review. When disaster strikes the first minute, hours, or days can be critical for the survival or welfare of those affected by the disaster. Hence, the rapid response must be well planned and coordinated in the form of emergency response plan. It delineates the roles and responsibilities of all stakeholders to be involved, actions to be taken, coordination arrangements and communication channels to be used.

The AAP framework included four well-reasoned elements such as information provision, participation, feedback and complaints, and learning and adaptation. It clearly defined each element, provided with a statement of commitment, and some key actions for humanitarian agencies. It also included suggested tools that provide guidance to the staffs to demonstrate accountability to affected population.

1. **Information Provision**

Statement of commitment: Provide timely, relevant and clear information about the organisation, the principles it adheres to, how it expects its staff to behave and the programmes it implements, to the communities, affected people and other key stakeholders using appropriate languages, formats and media (channel) that can be easily understood.

Key actions

- Defines and documents expectations and processes for sharing information about the organisation; how people can be involved in the project and how they can provide feedback and complaints.
- Plan how the information will be shared ensuring appropriate languages, formats, and media that are accessible and comprehensive for the communities, affected people and other key stakeholders.
- Monitor how well information is being disseminated, understood and received through consultation with communities, affected people and key stakeholders.
- Develop and/or reinforce safe and effective grievance procedures and take appropriate disciplinary actions against workers violating the code of conduct. This needs to be communicated with the communities at the very beginning to create awareness.

2. **Participation**

Statement of commitment: Enable two-way communication for engaging communities in dialogue, by managing the information both sent to and received from affected communities and integrating their feedback into decision-making process.

Key actions

- Make provision for the affected population to express their needs and aspirations ensuring they are treated respectfully and provided with clear information on assessment process and what happens next.
- Provide timely, accurate and life-saving information as aid to the affected people that contextualised in consultation with the local communities and integrated into the overall emergency actions.

- Ensure that response activities met the needs of the affected people and relevant; and the affected population are content of the selection criteria, entitlement, timeline of activities and project exit plan.

3. Feedback and Complaint Response

Statement of commitment: A standard feedback and complaint tool needs to be developed to allow the people to file complaints/feedback in an anonymous manner. However, it may not ensure participation of the people in the complaint/feedback process. Humanitarian agencies should consider additional measures depending on the context to nudge users' participation in the mechanism.

Key actions
- Establish and document feedback and complaints handling procedures in consultation with affected community with a clear procedure for submitting feedback and complaints; the steps taken and the right to receive a response.
- Register sensitive complaints in a separate IT interface database on daily basis and provide access of the donor focal person in the data.
- Ensure that intended affected communities, and its staff understand the feedback and complaints handling procedures and share report on feedback and complaints with affected community and stakeholders.
- Ensure that the communities understand the benefits of feedback and complaint response mechanism. To this end, the feedback and complaints response issue should be included in the Job Description and performance review of the senior management and frontline staff.

4. Learning and Adaptation

Statement of commitment: Establish a process of continual improvement of the humanitarian interventions based on learning and humanitarian quality standards including humanitarian principle, code of conduct

Key actions
- Ensure that the organisation regularly analyses monitoring and review data, as well as data from feedback and complaints mechanisms, to draw and document learnings from the programmes.
- Make a provision for continual improvement in the quality of response, beneficiary selection and promoting rights and entitlement of the affected community
- Ensure that lessons learned is part of the knowledge management system, and share throughout the organisational structure.
- Make a provision of peer review in terms of humanitarian quality standards by external experts.

Tools to aid meeting the commitments

Some tools are suggested to bridge between planning aid for humanitarian agencies to travel from general guidance of the commitments to operationalise the AAP framework at an individual level. These tools are extracted from different humanitarian agencies' good practices. These are not mandatory to use; instead the humanitarian agencies can use their own similar tools that serve the purpose of these tools. The tools/templates suggested in this report include:
1. Information disclosure policy
2. Staff Code of Conduct
3. Protection against sexual exploitation and abuse policy
4. Information sharing checklist
5. How to analyse affected communities' needs
6. Checklist for understanding affected community's information needs

7. Checklist and guidance for emergency messages for the affected communities
8. Guidance for ensuring affected community participation in the beneficiary selection process
9. Guidance for promoting community readiness
10. Job description of humanitarian accountability and community engagement officer
11. Guidance for complaint response mechanism
12. Serious complaint reporting form
13. Community feedback collection (satisfaction survey)
14. Case study template for documentation of good practice relating to AAP adaptation
15. Checklist for accountability assessment
16. Checklist for accountability planning

Recommendations

In order to operationalise the AAP framework, the study team have generated some recommendations for humanitarian agencies.

For Humanitarian Coordination Forum/Network

- Clarify humanitarian agencies that this AAP framework is not a new set of standards (like Sphere, CHS), but incorporates some elements of these existing standards and facilitate operationalise the AAP actions and tools.
- Pilot suggested AAP actions and tools to test the efficacy in demonstrating accountability to the affected people.
- Influence humanitarian agencies to incorporate issues in the needs assessment tools for capturing affected communities' information needs.
- Support humanitarian agencies to develop communication skills of their front-line staff so that they can effectively communicate appropriate information including emergency messages with affected people.
- Support humanitarian agencies to develop contents and formats and identify appropriate communication channels and processes to disseminate key information and emergency messages to the affected people.

For Implementing Agencies

- Deploy a dedicated person of quality and accountability whose job would be to support implementation of humanitarian accountability system and mechanism.
- Improve front-line humanitarian staff's understanding of the concepts, tools and processes of humanitarian accountability.
- Ensure that staffs are well informed and trained on safeguarding and protection against sexual exploitation issues.
- Conduct peer review in mid-term and after the end of project combining internal and relevant external experts focusing on accountability elements outlined in the AAP framework.
- Put in place a system of periodic self-audit, internal peer review, and reflect the responsibilities in staff's job description and performance review.
- Make publicly available the findings of peer review, and evaluations in appropriate format to the stakeholders, including the affected people and local government members.
- Create a provision for emergency funding to initiate rapid response to provide lifesaving support to the affected people without waiting for donor funding.

- Contextualise emergency messages using appropriate format in collaboration with other humanitarian agencies at local level prior to an emergency.

For Funding Agencies

- Integrate accountability elements into funding agencies' monitoring and evaluation framework.

- Make a provision of incorporating accountability elements in the project funding proposal format, ensuring budget for implementing proposed activities relating to accountability as well as quarterly/bi-annual review of budget.

- Introduce a system of auditing accountability in humanitarian response. This will reinforce implementing agencies to implement AAP elements properly.

- Include a clause in the in the partnership/contract agreement clearly specifying the provision of reporting sensitive complaints within 24 hours.

1. INTRODUCTION

1.1. BACKGROUND

The Start Fund Bangladesh (2017-2020), a £10 million rapid emergency response fund, has been set up by the Start Network with support from UK aid. The fund activates within 72 hours of a crisis alert and is accessible to both national and international member NGOs operating in Bangladesh to respond early and fast to under the radar emergencies in Bangladesh. The ultimate target of the Start Fund Bangladesh is to make sure rapid response in emergency situations to minimize losses of lives and properties in the affected areas.

Start Fund Bangladesh (SFB), during its two learning events, has identified some challenges in enabling people affected by crisis aware of their entitlements, having access to information and participating in decisions as well as having access to safe and responsive mechanisms to handle complaints. The key challenges that have been identified in the learning events are - (i) the mechanisms (e.g. complaint boxes) being set-up without readiness; (ii) mind set; (iii) 'trust' of the affected community; (iv) staff members/ implementing agency's understanding of the intended purpose; (v) allocation of dedicated resources (e.g. personnel) for the mechanism; (vi) the failure to communicate the purpose to the affected communities affecting the nature and quality of feedback; and most importantly (vii) the absence of a fit-for-purpose 'beneficiary accountability mechanism' to emulate with the rapidness and shorter timeframe of Start Fund responses.

> Considering these challenges, Start Fund Bangladesh intends to develop a simple accountability Framework containing minimum requirement guidelines and relevant tools to strengthen accountability mechanisms. It will enable Start Fund Bangladesh members to be effectively able to roll out a common beneficiary accountability mechanism for enhancing the quality across Start Fund responses and collectively attain its commitments towards a "participation revolution"[2].

1.2. OBJECTIVE OF THE ASSIGNMENT

Objective of the assignment is to identify best practices for accountability to affected communities that can be adopted by the Bangladesh members for Start Fund responses. It will include an accountability framework, minimum requirement guidelines in light of the accountability and relevant tools for establishing mechanism for accountability to the affected population.

1.3. METHODOLOGY/ STUDY APPROACH

Literature review and development of tools: During inception phase of the assignment, the research team carried out desk review and analysis of Start Fund Bangladesh documents as well as variety of relevant documents and tools relating to accountability.

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[2]A "participation revolution" as per the Grand Bargain Commitments (which the Start Network is also a signatory): Fuller and more influential involvement of crisis- affected people in what relief is provided to them, and how. It ensures inclusion of gender, age and disability.

Development of tools: The review and analysis of variety of documents (see reference section for the details) provides the researchers with a good insight on the issues of accountability within disaster response and that help develop tools (IGD and KII checklists) for stakeholder consultation. The tools were finalised in consultation with the SFB team.

Data collection: The research team collected in-depth data on different attributes of accountability being practiced by the SFB member agencies through IGDs with the community groups, such as men, women, and person with disabilities. They conducted separate IGDs with each group consisted of 8-10 people. These IGDs provided the research team with a better insight on the perception of the affected people about existing accountability mechanism in humanitarian response. In addition, the research team also conducted KIIs with the relevant government officials, including, DDM, and key members of Union and Upazila level disaster management committees in the selected locations. All the IGDs and KIIs were administered by the pre-designed checklists.

Data analysis and reporting: The research team analysed primary data from the field and practitioners using the agreed analysis framework and develop an accountability framework, and relevant tools and guidelines for sharing with SFB members. A validation workshop will also be organised with the SFB members to obtain feedback. This will help researchers to finalise the accountability framework, tools and guidelines, and generate recommendations. Once the framework is finalised, NIRAPAD team will provide support to one selected SFB member in rolling-out accountability framework, tools and guidelines.

2. ACCOUNTABILITY TO AFFECTED POPULATION (AAP) IN PRACTICE

2.1. CONCEPT OF AAP

The humanitarian sector has spent good amount of time understanding and exploring the importance of being accountable to affected population. The concept of accountability to the affected population evolved over the years and get special attention in several humanitarian policies, codes and principles. By establishing humanitarian sector's first international self-regulatory body in 2003 which is widely known as a Humanitarian Accountability Partnership (HAP) International, humanitarian actors systematically approached to improve the accountability of humanitarian action to people affected by disasters and other crises. The Indian Ocean tsunami response which was started in 2004 following the aftermath gave another momentum to the humanitarian community to revisit the issue of accountability.

Primarily, the humanitarian actors aimed to reinforce accountability to the crisis affected population and enable improved performance of the various humanitarian services. The ultimate goal was to uphold the rights and the dignity of crisis-affected populations across the world. In the meantime, the humanitarian actors took several initiatives to shape the discourse around the accountability to the affected population and to promote effective ways to deliver their downward accountability. The humanitarian donors have also begun to use it as an essential condition of funding and evaluations of humanitarian action and contributed to the development of AAP concept and shaped its implementation on the ground.

The term accountability has different definitions and the humanitarian actors also attempts to define accountability to make it fit for the humanitarian context. The International Federation of Red Cross Red Crescent Societies (IFRC) cited accountability as the means by which individuals and organisations report to a recognized authority, or authorities, and are held responsible for their actions[3]. Furthermore, wider NGO communities also investigated the accountability issues related to their target population and tried to come up with working definition. The Global Accountability Framework Project by One World Trust define accountability as the processes through which an organisation makes a commitment to respond to and balance the needs of stakeholders in its decision-making processes and activities[4].

The Humanitarian Accountability Partnership (HAP) International in 2010 defined accountability as 'the means through which power is used responsibly, it is a process of taking into account the views of, and being held accountable by, different stakeholders, and primarily the people affected by authority or power.'[5] Later, HAP International merged with the new initiative and drawing upon existing key humanitarian standards and commitments including HAP International into the Core Humanitarian Standard on Quality and Accountability (CHS) that sets out nine commitments for humanitarian actors to put communities and people affected by crisis at the centre of humanitarian action.

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[3]Edwards and Hulme 1995, quoted in ALNAP, 16.

[4]One World Trust, Global Accountability Framework Project Principles of Accountability at http://oneworldtrust.org/

[5]https://reliefweb.int/report/world/2010-hap-standard-accountability-and-quality-management-enar

One of these commitments is specifically focused on accountability: "CHS Commitment Five: Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints."

Another commitment also has strong relation to the accountability which is "CHS Commitment Four: Communities and people affected by crisis know their rights and entitlements have access to information and participate in decisions that affect them."

During this progress, the Grand Bargain[6] as a part of the World Humanitarian Summit in 2016 also sets out 51 commitments divided in nine thematic work streams and one cross-cutting commitment to get more means into the hands of people in need and to improve the effectiveness and efficiency of humanitarian action. Under its thematic work stream on the participation revolution, humanitarian actors aimed to include people receiving aid in making the decisions which affect their lives, aid organisations and donors commit to Improve leadership and governance mechanisms at the level of the humanitarian country team and cluster/sector mechanisms to ensure engagement with and accountability to people and communities affected by crises. Furthermore, development of common standards and a coordinated approach for community engagement and participation, with the emphasis on inclusion of the most vulnerable, supported by a common approach which are also contributed into accountability discourse.

In the latest edition of the Sphere Handbook 2018, it defines accountability in the humanitarian sector as:

'The process of using power responsibly, taking account of, and being held accountable by, different stakeholders, and primarily those who are affected by the exercise of such power, For Sphere users, this means in particular:

-Explain how their programmes conform with best practice and commonly agreed commitments (for example, evidence-based standards like Sphere) by sharing results and reasons for action and non-action in a particular context in a transparent way.

-Involve stakeholders in their work, with regard to affected populations, this means taking into account their needs, concerns and capacities at all stages of humanitarian response, respecting their right to be heard and to be involved in decisions affecting their lives, and providing them with the means to challenge agencies' decisions.'[7]

The United Nations understands the Accountability to Affected Populations (AAP) as:

'An active commitment by humanitarian actors and organisations to use power responsibly by taking account of, giving account to, and being held to account by the people they seek to assist'.

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[6]https://www.agendaforhumanity.org/initiatives/3861

[7]https://spherestandards.org/wp-content/uploads/Sphere-Handbook-2018-EN.pdf

At country level United Nations Resident Coordinator ensures that humanitarian actors establish direct, responsible and respectful relationships with aid recipients to ensure their continuous engagement throughout the response. For example, Office of the UN resident Coordinator in Bangladesh through Humanitarian Coordination Task Team (HCTT)- a joint coordination platform with Government of Bangladesh and humanitarian community promotes humanitarian actions that is accountable to affected people, and it facilitates predictable coordination approaches that integrate gender, age, disability and other vulnerability considerations into all aspects of humanitarian response.

2.2. AVAILABLE AAP FRAMEWORK

2.2.1. Emergency Capacity Building (ECB) Project Framework

The Emergency Capacity Building (ECB) Project, a collaborative capacity building partnership project among seven non-governmental organisations (NGOs), aimed at improving the speed, effectiveness and delivery of humanitarian response programs. Bangladesh was one of the targeted countries. The participated agencies in ECB project identified and agreed to focus on following five key elements[8] to improve and increase their accountability in humanitarian response.

Leadership: The extent to which leadership in agencies articulate what accountability means to the individual and to the organisation; the extent to which policy and practice is clear about expectations around accountability and the extent to which accountability is modelled and demonstrably valued by leadership.

Transparency: The provision of accessible and timely information to communities and the opening up of organisational procedures, structures and processes that affect them. To be transparent an organisation needs to do more than disclose standardised information. It also needs to provide communities with the information they require to make informed decisions and choices. In this way transparency is more than just a one-way flow of information; it is an ongoing two-way dialogue between an organisation and its targeted communities over information provision.

Feedback: The systems, processes, attitudes and behaviours through which an organisation listen to its targeted communities. Feedback is an essential part of the above three dimensions and essential for organisations to understand whether they are meeting the agreed needs of the affected population or not. An organisation that actively seeks to improve policy and practice on the other dimensions will decrease, significantly, the number of complaints it receives. Organisations should ensure that they have Feedback Mechanisms in place throughout their programmes, and that these are robust enough to support complaints about breaches in policy and stakeholder dissatisfaction.

Participation: The process by which an organisation enables communities to play an active role in the decision-making processes that affect them. It is unrealistic to expect an organisation to engage all stakeholders in all kinds and levels of decision-making. Therefore, the organisation must have clear guidelines and practices enabling it to prioritise stakeholders including targeted communities appropriately and to be responsive to the differences in power between them. In particular, mechanisms need to be in place to ensure that the most marginalised and affected communities are represented and have influence.

Design, monitoring and evaluation (DME): Encompasses the processes through which an organisation, with involvement from affected communities, monitors and reviews its progress and results against goals and objectives; feeds learning back into the organisation on an ongoing basis; and reports on the results of the

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[8] http://www.alnap.org/meetings/pdfs/22_accountability_framework.pdf

process. To increase accountability to affected communities, goals and objectives must be designed in consultation with those stakeholders.

2.2.2. IASC AAP Framework

The Inter-Agency Standing Committee (IASC) is the primary mechanism for inter-agency coordination of humanitarian assistance, consisting of the key UN and non-UN humanitarian partners. The IASC was established in June 1992 following the UN General Assembly Resolution on the strengthening of humanitarian assistance. In December 2011, the IASC principles have endorsed the following five commitments on Accountability to Affected Populations[9]:

Leadership/governance: Demonstrate their commitment to accountability to affected populations by ensuring feedback and accountability mechanisms are integrated into country strategies, programme proposals, monitoring and evaluations, recruitment, staff inductions, trainings and performance management, partnership agreements, and highlighted in reporting.

Transparency: Provide accessible and timely information to affected populations on organisational procedures, structures and processes that affect them to ensure that they can make informed decisions and choices, and facilitate a dialogue between an organisation and its affected populations over information provision.

Feedback and complaints: Actively seek the views of affected populations to improve policy and practice in programming, ensuring that feedback and complaints mechanisms are streamlined, appropriate and robust enough to deal with (communicate, receive, process, respond to and learn from) complaints about breaches in policy and stakeholder dissatisfaction.

Participation: Enable affected populations to play an active role in the decision-making processes that affect them through the establishment of clear guidelines and practices to engage them appropriately and ensure that the most marginalised and affected are represented and have influence.

Design, monitoring and evaluation: Design, monitor and evaluate the goals and objectives of programmes with the involvement of affected populations, feeding learning back into the organisation on an ongoing basis and reporting on the results of the process.

2.2.3. IFRC Framework

IFRC now a days use Community engagement and accountability (CEA) as an approach to the Red Cross Red Crescent programming and operations where accountability is one of the key areas of focus. CEA approach supported by a set of activities that help Red Cross Red Crescent national societies to put communities at the centre by integrating communication and participation throughout the programme cycle or operation. IFRC also used different terminology earlier to describe the accountability to the affected population and in 2011 in their lessons learned study on Beneficiary Communication and Accountability[10], IFRC applied four principles developed by the One

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[9]https://interagencystandingcommittee.org/system/files/legacy_files/TOOLS%20to%20assist%20in%20implementing%20the%20IASC%20AAP%20Commitments.pdf

[10]https://www.ifrc.org/PageFiles/94411/IFRC%20BCA%20Lesson%20Learned%20doc_final.pdf

World Trust's Global Accountability Project (GAP)[11] in their humanitarian programme review for Indonesia, Haiti and Pakistan. The principles are following:

Transparency: The provision of accessible and timely information to beneficiaries and the opening of organisational procedures, structures and processes to their assessment.

Participation: The processes through which an organisation enables beneficiaries to play an active role in the decision-making process and the activities that affect them.

Monitoring and evaluation: The processes through which an organisation, with involvement from beneficiaries, monitors and reviews its progress and results against goals and objectives, feeds learning back into the organisation on an ongoing basis, and reports on the results of the process.

Complaints and response mechanisms: Mechanisms through which an organisation enables its beneficiaries to address complaints against its decisions and actions and through which it ensures that these complaints are properly reviewed and acted upon.

2.2.4. BBC Media Action Framework

UNOPS Bangladesh office under the Strengthening Humanitarian Preparedness and Response programme commissioned an explorative research study to BBC Media Action to better understand the accountability mechanisms using by the humanitarian actors in Bangladesh. In this study BBC Media Action focuses on four aspects of humanitarian accountability[12]:

Beneficiary selection: In majority cases, humanitarian assistance cannot be provided to every member of an affected community. Thus, humanitarian agencies need to priorities their services and support to fulfil the needs of most vulnerable and best to utilize the limited resources. As their resources are limited, agencies need to decide who will be best benefited from the services, based on a set of criteria which considers communities' and individuals' needs and capacities[13].

Information provision: The first key action under fourth commitment of the CHS is to 'provide information to communities and people affected by crisis about the organisation, the principles it adheres to, how it expects its staff to behave, the programmes it is implementing and what they intend to deliver.' Being informed on what a humanitarian agency aims to deliver, and how, is important as it hypothetically allows affected communities to hold that organisation to account in case such agency is not delivering on their commitments.

Participation: The affected communities' participation is important to ensure humanitarian assistance and services are meeting the essential needs of the people. The HAP International standard also recognized the importance of organisation listen to the affected population they are targeting to assist and incorporating the views and analysis of the affected population in programme decisions.' HAP standard further emphasised on the development of a process that enable affected people to influence and participate in every stage of a project, from design to implementation to evaluation. The fourth commitment of the CHS reemphasis this element and urge for inclusive participation, involving the participation and engagement of crisis affected people and communities at all stages of the humanitarian programming.

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[11]http://www.oneworldtrust.org/accountability.html

[12]http://cms.shongjog.org.bd/contentAsset/raw-data/169e14a5-bb29-459e-a5dc-cc9d42bd2a4d/fileAsset

[13]HAP Standard (2010) – Standard requirement 4.2 (page 18) and 3.2 (page 15).
https://www.chsalliance.org/files/files/Resources/Standards/2010-hap-standard-in-accountability.pdf

Complaints and feedback: The humanitarian agencies need to have feedback and complaints response mechanisms in place which affected people feel safe and confident to use to provide their opinion and raise their complaints if there is any. The quality criteria for fifth CHS[14] commitment further recommends that the communities should be consulted on how complaints handling processes should be designed and implemented, and that the process is well communicated to communities. It recommends that complaints processes should cover programming, as well as abuses of power by agency staff or volunteers.

2.3. EXISTING AAP PRACTICES IN SFB MEMBER AGENCIES

As a part of this assignment, the study team assessed and analysed the different existing practices of Start Fund member agencies applying to ensure their accountability to the affected population. The differences between international and national NGOs are explicit when it comes to the policy and practice related to accountability. International NGOs in Bangladesh have progressed a lot compared to the advancement of national NGOs made through the formulation of the policies and tools on accountability. However, most of the practical tools both from the International and national NGOs are focused on the feedback and complaint response mechanism. The study team observed that the inclusion of such feedback and complaint mechanism is prominent in Bangladesh as a result of the humanitarian donor condition which is becoming a regular practice for humanitarian response. Only few organisations are able to produce relevant policies and tools in Bangla to ensure easy access of the communities. Also, very few organisations have provision and tools within their organisational policies and practices to share information with their targeted communities. Most the organisations have assigned a focal person who deals with the complaint and response mechanism as an additional responsibility while very few organisations have dedicated department and staff to implement accountability mechanism. Thus, the majority of the organisations combined their complaint and feedback mechanism for both development and humanitarian programming into one policy and tools which at times are difficult to apply in the rapid response context.

The study team also noticed in the field visit and stakeholder workshop that the Start Fund Bangladesh member agencies shared relevant information and engaged communities in different occasion during their response operation. However, members are lacking tools to capture such information sharing and community participation in a systematic manner. Furthermore, Start Fund Bangladesh has a provision for their members to be flexible and made necessary adjustment based on the learning during the rapid response. In many cases, member agencies made adjustment ensuing their learning but didn't capture systematically how member agencies made decisions and affected communities were involved to influence such decisions. Moreover, member agencies stated in the stocktaking workshop that the community preference is missing when they decide about the modalities of the feedback response mechanism. The Member agencies themselves decide the mode of feedback mechanism and don't ask affected communities how they want to share feedback.

The stocktaking workshop provided a good insight on the current practice of demonstrating accountability to the beneficiaries in rapid response. A brief summary of findings under each area of concern is presented below:

Information and communication flow to communities is quite weak.

- The SFB member agencies share variety of information with the community throughout the humanitarian program cycle using different tools. But there is no uniform or standard tool that they use

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[14]https://corehumanitarianstandard.org/files/files/Core%20Humanitarian%20Standard%20-%20English.pdf

for information sharing with the vulnerable communities and stakeholders. This lack limits the organisations to share information in details with different stakeholders in a coherent manner. As well, the community people including women, men, girls, boys, persons with disabilities face difficulties in accessing information. Standardization of information sharing tools would better enable the humanitarian organisation to share appropriate information with the stakeholders and affected communities, thereby enhancing effectiveness and credibility of the organisations.

- They use different communication channels to share information in different disaster settings such as community meeting, household or community visit, display board in public places, beneficiary card. The way the information dissemination is being practiced by SFB Member agencies seemed appropriate for different contexts. It should be kept in mind that in a particular context all the methods may not be required and even separate method may need to be developed.

- The SFB Member agencies share partial information with the stakeholders including beneficiaries. One group of participants mentioned that organisations share only 20-25 percent of the information with community people, while 70-80 percent of the project related information with the direct beneficiaries. Sharing partial information often create hidden expectation and mistrust of the beneficiaries that may lead to conflict in the communities. Hence, a systematic approach is required to reduce these attributes and widen the scope of sharing information.

Affected people's influence in decision making is not very clear.

- One of the major capacity gaps of the frontline staff is that they cannot clearly delineate the objectives and activities relating to accountability to the affected population under humanitarian response. They are rather more activity oriented i.e. setting up complaint box, using mobile phone or hotline number for taking complaints. This capacity gap attributed to a lack of clear guideline and comprehensive orientation to front line staff on mechanism for accountability to the affected population.

- It is found that the participation and engagement of the affected communities with the disaster response in Bangladesh has improved in the last few years. However, few questions are raised about the quality of these engagement to influence the decisions of the agencies made throughout the response program. For example, in terms of participation of the crisis affected population in the design of response program, they mentioned that the response decisions are made based on the needs assessment findings and recommendations. During the rapid response, affected communities have limited opportunity to influence the response design directly though they actively participate in the assessment which guides the response. One of the best ways of demonstrating accountability to the affected population is putting them at the centre of concentric circle of programming despite having some practical difficulties, to address priority needs of the beneficiaries.

- Participation of the vulnerable groups in the response activities varies. NGOs in many cases lack clear strategy and guidelines to engage the especially vulnerable groups e.g. persons with disabilities, elderly people, pregnant and lactating women, ethnic minority in their needs assessment process. In most of the cases, the needs of the especially vulnerable people are ignored during needs assessment due to lack of clear strategy and guidelines that would ensure the voices of especially vulnerable groups are heard and taken account of it.

Feedback mechanism are in place in most of the organisation but least functional. AAP has become "Box-ticking exercise" in the backdrop of weak quality certification process.

- All the agencies establish complaint and feedback mechanism during response. However, it was evident that the international NGOs are better in place to set up and respond to complaint complying organisational commitment and policy compared to the national and local NGOs. The participants also critically reviewed the effectiveness of such mechanism in the disaster settings and several examples were referred to whether the complaint response mechanism was established and worked effectively. Most of the agencies practice setting up mechanism but they are not committed to respond to the complaints in time. They can bypass this due to lack of a robust monitoring system.

- Gaps are clearly revealed in the engagement of the communities in designing the complaint response mechanism; instead, the organisations tend to apply one-size fit model for all the responses without analysing the community preference around the mechanism. This practice is deviated from the principles of accountability and the humanitarian organisations seem enjoying privilege in designing the complaint response mechanism without consultation with the affected community. It was clear in the discussions that this practice is underpinned by the absence of a clear strategy and guideline for ensuring community participation in the design of complaint response/feedback mechanism.

- The aspiration of the complaint and feedback response mechanism is to increase efficiency and effectiveness of the disaster response ensuring meaningful engagement and dialogue between the communities and organisation who deliver services. However, almost everyone participated in the consultation agreed that the complaint and feedback mechanism yet to become a meaningful tool to promote accountability to the affected population. The participants also questioned why such a mechanism didn't get expected results to ensure accountability to the affected population. Furthermore, it is also important to look critically what can be done to make it effective.

Humanitarian community is suffering from chronic amnesia- about use of lesson.

- Emergency situation is not static, it is evolving and many new problems emerged out as a result of change in the situation. But humanitarian communities do not keep record of those. As a result, discussions on the issues repeat several times. Actually, humanitarian communities are suffering from 'chronic amnesia[15]' by not taking stock of lessons learned from previous evaluations. The term is used here to highlight a very important issue that lot of discussions are held at different level and consensus is built on some important issues.

- It is agreed that the Start Fund Bangladesh is the only initiative which allows organisation to make such changes during the humanitarian project life cycle. Other funding modalities have difficulties to adapt changes during the project life time.

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[15]Amnesia is a general term describing memory loss.

3. AAP FRAMEWORK FOR RAPID RESPONSE

3.1. OVERVIEW OF THE FRAMEWORK

The accountability to affected population is about the affected population holding power to account humanitarian actors and enable them to provide input in the decision-making on issues affecting their daily lives. This research identified different accountability framework being used by different agencies. Start Fund Bangladesh has adopted the SHAPE (Strategic Humanitarian Assessment and Participatory Empowerment) framework focusing on strategic humanitarian assessment and participatory empowerment which was developed under the Shifting the Power project. This SHAPE framework is not an accountability framework, but it includes elements that are relevant to accountability. Despite having existence of all these frameworks, SFB felt the need for a common framework that would enhance efficiency of the partner agencies in delivering assistance to the people affected by rapid onset of disaster. Having reviewed and analysed existing frameworks from SFB member agencies, outcome of stocktaking workshop and findings from the field visits, NIRAPAD has designed a simple AAP framework as illustrated below.
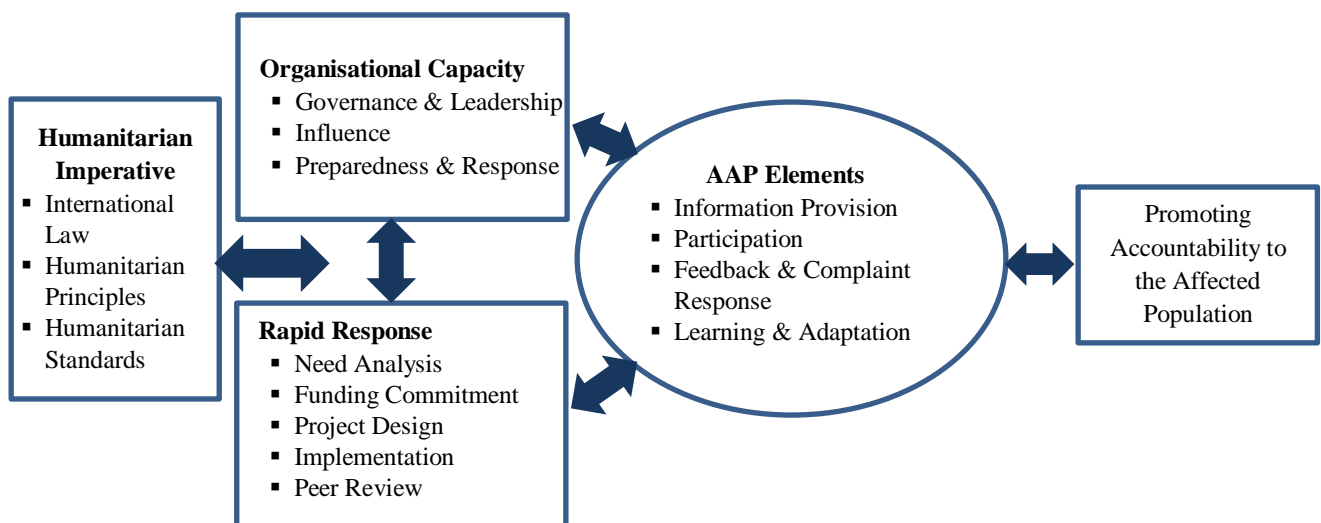
AAP Framework for Start Fund Bangladesh Member Agencies

> The framework shows how the four accountability elements are intrinsically linked with three different perspectives, such as humanitarian imperative, organisational capacity and rapid response phases which promote accountability to the disaster affected population.

The framework presented here is based on the assumption that the humanitarian organisations particularly SFB members are committed to humanitarian imperatives and deliver their commitments through integrating international law, humanitarian principles and humanitarian standards in their policies, strategies, and guidelines.

> Humanitarian principles shape the organisational capacity, integrating three key elements, such as governance and leadership, influence, and preparedness and response.

Although the capacity varies between international, national and local organisation, it is clear that all the member organisations initiate rapid response. Analysis of current practices of rapid response suggests that the rapid response project is mainly shaped by some common elements, such as need analysis, funding commitment, project design, implementation, and peer review. In most of the cases, the humanitarian organisations follow clear guidelines for project and funding proposal. But some national and local organisations do not have a clear guideline for need analysis and peer review. Also, the analysis identified some important accountability elements are either absent or very weak and that debilitating the effectiveness and efficiency of the rapid response programme.

> It is crucial to integrating the AAP elements in the rapid response projects in order for effective demonstration of accountability to the disaster affected population and enhance efficiency of the programme.

3.2. HUMANITARIAN IMPERATIVE

Humanitarian action comprises assistance, protection and advocacy in response to humanitarian needs. It aims to save lives and reduce suffering in the short term, and in such a way as to preserve people's dignity and open the way to recovery. Humanitarian action is based on the premise that human suffering should be prevented and alleviated wherever it happens that referred to as the humanitarian imperative.

> International law, humanitarian principles and humanitarian standards are the basis of humanitarian imperatives.

International law: International law serves as a basis for humanitarian action. It defines the legal obligations of States in their conduct with each other and their treatment of individuals, including the fundamental legal standards for the protection of individuals and the type of assistance that may be provided. Two main bodies of international law apply to humanitarian action.

First, *international human rights law* applies at all times, as human rights are fundamental to every human being. International human rights law lays down obligations which States are bound to respect. At the core of international human rights law is the *International Bill of Human Rights*, which consists of three elements: the Universal Declaration of Human Rights; the International Covenant on Civil and Political Rights with its two Optional Protocols; and the International Covenant on Economic, Social, and Cultural Rights with its Optional Protocol.

Second, *international humanitarian law* applies to situations of armed conflict. It aims to limit the effects of hostilities on both persons and objects, and to protect certain particularly vulnerable groups of people. It also establishes measures of protection for humanitarian actors.

Humanitarian principles: Humanitarian agencies promote and uphold humanitarian principles throughout the response, and ensure adherence to them. It strengthens the humanitarian community's acceptance and credibility vis-à-vis national/local authorities to gain access to affected populations and to ensure the safety and security of humanitarian personnel.

Humanity: Human suffering must be addressed wherever it is found. The purpose of humanitarian action is to protect life and health and ensure respect for human beings.

Neutrality: Humanitarian action must be autonomous from the political, economic, military or other objectives that any actor may hold in relation to areas where humanitarian action is being implemented.

Impartiality: Humanitarian actors must not take sides in hostilities or engage in controversies of a political, racial, religious or ideological nature.

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

Humanitarian Standards: Humanitarian agencies are committed to demonstrating that they are accountable to affected people for the assistance and protection they provide. They apply following key standards and accountability measures for assuring quality of the humanitarian actions. These are:

The Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief (1994) is a voluntary code of ten principles to safeguard high standards of behaviour among humanitarian responders.

The Core Humanitarian Standard on Quality and Accountability (2014) establishes nine verifiable commitments that organisations can use to improve the quality and accountability of their action.

The Sphere Handbook (2011) and companion standards are important technical resources for every humanitarian worker. It sets internationally recognized common principles and universal minimum standards for the delivery of humanitarian action.

3.3. ORGANISATIONAL CAPACITY

The organisational capacity comprised of three key elements as suggested in the SHAPE Framework[16] such as governance and leadership, influence, and preparedness and response. A brief summary of the elements is presented below.

Governance and leadership: Organisational governance refers to a system by which an organisation makes and implements decisions in pursuit of its objectives. Capable humanitarian organisations have a clear vision, mission, shared sense of values and strong consensus about what it is striving for. The organisations

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[16]SHAPE framework developed by Start Network is a tool to support local and national organisations taking part in the Shifting the Power project to assess their capacity to not only manage humanitarian programmes, but also to control and influence the humanitarian response.

have a diverse governing body who meets regularly and provide strategic oversight, monitor overall effectiveness, hold the executive to account and regularly review effectiveness of the organisation. A culture of open communication exists that promote transparent and participatory decision-making process. They invest human resource development ensuring human resource policy is budgeted that include consideration of health and safety issues, leave, child protection, compensation and benefit. Organisation's codes of conduct for staffs, including those who come in direct contact with the organisation, and grievance policy are in place. The organisation follows a robust and transparent financial policy, system and procedures that comply with donor requirement to govern the effective and efficient use of money and other resources. A participatory M&E exists which include financial analysis, learning, feedback and complaints inform future programming and value for money. They share evaluation findings, learning and critical reflection with wider humanitarian sector. Overall governance system assures corruption is minimized, the views of minorities are taken into account, and that the voices of most vulnerable population are heard in decision making. It is also responsive to the present and future needs of the vulnerable populations.

Influence: Influence refers to the power to have an effect on someone or something. The ability to influence others and empower people's development accelerates results and ultimately ensures effectiveness and efficiency of the humanitarian organisation. An effective humanitarian organisation does not work in isolation. It works with others demonstrating a sustained commitment to coordination and collaboration with national and local authorities without compromising its humanitarian principles; participate in multi-sector and interagency initiatives and contribute to decision making. The humanitarian organisation has the strategy, competent staffs, and ability to recognize key humanitarian issues affecting local community and recommend feasible approach to address them. It always strives to mobilise resources for a timely and appropriate humanitarian response generating successful programme concept and proposal based on its relationship, competent staffs, and procedures. It is champions in addressing key issues adversely affecting communities and has sufficient, flexible and diversified resources to ensure organisational sustainability and effectiveness.

Preparedness and response: Preparedness and response refer to measures taken to prepare for or to reduce the effects of disaster and/or respond effectively to the impact of likely, imminent or current hazard, events and conditions. Effective humanitarian organisations anticipate, prepare for, and respond to humanitarian situation in a relevant, effective, efficient and impactful manner. Their actions are based on communication, participation and feedback from affected communities. Effective humanitarian organisations invest in developing staff competencies and emergency preparedness and response plan. Their responses are designed, taking into consideration the core humanitarian standards and cluster guidelines, budgeted and implemented based on impartial assessment of needs, risks, vulnerabilities and capacities of different vulnerable groups without unnecessary delay.

The rapid response programme is flexible to adapt changing needs, capacities and context. Policies and strategies are designed to prevent programme having any potential or actual negative effects, and consulted with communities and people to obtain their feedback on the quality and effectiveness of assistance using language, format and media that are easily understood and culturally appropriate for the community. The humanitarian organisations develop a culture where complaints are welcomed and acted upon according to defined policies and processes.

3.4. RAPID RESPONSE

When disaster strikes the first minute, hours, or days can be critical for the survival or welfare of those affected by the disaster. Immediate and effective emergency response reduce stress and fear, and help avoid the intensification of disaster situation into worse. Inappropriate and inadequate management during emergency response can even worsen the situation, increase losses than even when the response is non-existent.

> The rapid response is always well-planned and coordinated in the form of an emergency response plan. It delineates the roles and responsibilities of all stakeholders are to be involved, actions taken, coordination arrangements and communication channels to be used.

Rapid response comprised of five key elements. A brief summary of the elements is presented below.

Need analysis: In order to mount a rapid response, a rapid needs analysis is conducted as early as a few hours after the onset of a disaster. The purpose of this analysis is not to conduct a detailed survey, but to perform a broad analysis of the disaster and basic needs of the population in order to identify priorities for assistance. It primarily covers access and security, demographics of the affected population, community resources, health, water, sanitation, food and non-food items, and shelters (including temporary housing). The analysis is based on information from as many sources as possible, and to perform direct observation in order to verify data, but too much reliance on secondary information, a significant gap can be overlooked. The need analysis is separate from immediate life-saving activities, such as emergency search and rescue or emergency medical assistance. As indicated in the Sphere Standards, the first step in humanitarian response is to assess the needs of the affected population, and design a prioritized plan of action based on those needs. By doing so, this improves the quality and speed of response. Without a rapid assessment, significant gaps or overlaps in assistance may occur, which not only wastes precious resources at a time of great need, but can also be a cause of further burden to the affected population

Funding commitment: Funding commitment is crucial for the design and implementation of rapid humanitarian response programme ensuring core humanitarian standards and accountability principles. The funding commitment refers to funding commitment from donors and as well as own commitment of humanitarian agencies. Donor funding often delays the implementation, hence it is important for the humanitarian agencies to have their own fund for initiating rapid response.

Project design: Humanitarian agencies design rapid response project on the basis of needs analysis of the affected population. A well-designed project reflects organisational commitment to core humanitarian standard, principles, and the standard agreed by international humanitarian community. It must include well-conceived logical framework/theory of change with well-articulated objectives, target and measurable indicators. The main purpose of rapid response is to addresses the immediate needs and priorities of the affected population. Humanitarian situation is not static; it evolves with the time and new dimensions are added in the situation. Hence, the design has the flexibility to adapt changing needs of the situation and affected population.

Implementation: Implementation of rapid response aimed at responding the needs and priorities of the affected people, including provision of food and non-food items, provision of water, sanitation and hygiene services, and health and shelter interventions. In the immediate hours and days after a disaster, when

search-and-rescue activities are critical, it is most often the local actors who are first to respond. Humanitarian response must be coordinated with other humanitarian agencies and taken into account the most vulnerable, ensuring core humanitarian standards

Peer review: peer review is designed to assess the validity and quality of project implementation. Its ultimate purpose is to maintain quality and integrity of the project by identifying gaps that need actions. From the humanitarian organisations' perspective, peer review functions as a way of evaluating projects, response, or decision by a group of humanitarian experts. Looking into key aspects of the project and its activities, the peer review directs better quality of work and enhancing effectiveness, efficiency and accountability.

3.5. AAP ELEMENTS

The framework for accountability to affected population included four well-reasoned elements i.e. information provision, participation, feedback and complaints response, and learning and adaptation. In order to apply each element, the humanitarian agencies require commitments, key actions and suggested tools that provide guidance to the humanitarian staff to demonstrate accountability to the affected population.
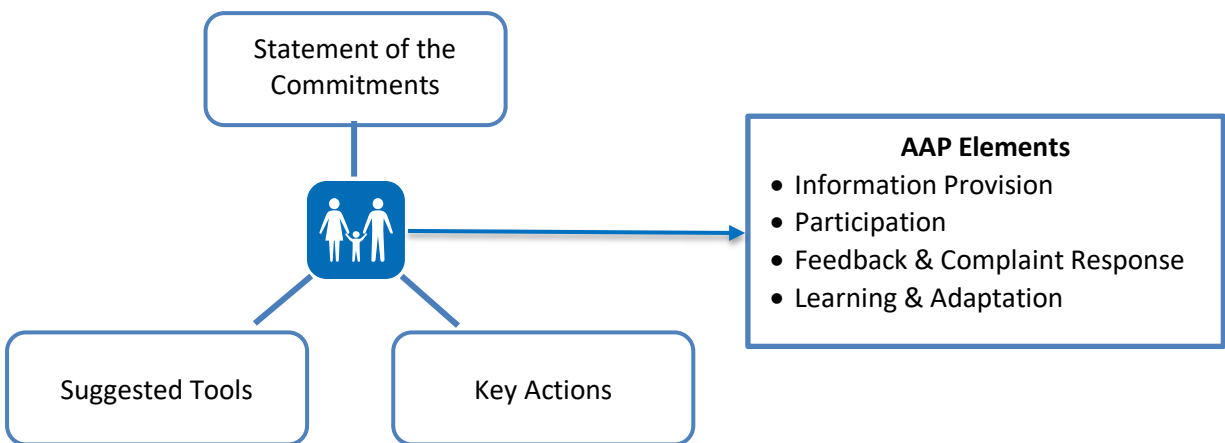
A brief summary of AAP elements is described below.

Information provision: Information means any content in paper, electronic or other medium, concerning a matter relating to organisation[17]. Communication is the interaction where information is exchanged and understood. Information sharing is how an organisation ensures that the peoples it aims to assist, and other stakeholders have access to timely, relevant and clear information about the organisation and its activities. It involves looking at the way we currently share information, making it more systematic and standardized, and producing varied tools for various audiences. This includes sharing information on: the organisation and its activities/projects; what behaviour people can expect from our staff; how people can be involved in the project and how to provide feedback and complaints on the organisation, its staff members or its interventions.

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[17]ACT Alliance definition of Information

Provide timely, relevant and clear information about the organisation, the principles it adheres to, how it expects its staff to behave and the programmes it implements, to the communities, affected people and other key stakeholders using appropriate languages, formats and media (channel) that can be easily understood.

Key Actions

- Defines and documents expectations and processes for sharing information about the organisation; how people can be involved in the project and how they can provide feedback and complaints.
- Plan how the information will be shared ensuring appropriate languages, formats, and media that are accessible and comprehensive for the communities, affected people and other key stakeholders.
- Monitor how well information is being disseminated, understood and received through consultation with communities, affected people and key stakeholders.
- Develop and/or reinforce safe and effective grievance procedures and take appropriate disciplinary actions against workers violating the code of conduct. This needs to be communicated with the communities at the very beginning to create awareness.

Participation: Participation refers to the process of involving affected people in the decisions that affect them[18]. It is about using the most appropriate communication approaches to listen to communities' needs and aspirations, feedback and complaints, ensuring they can actively participate and guide organisation actions. It ensures two-way communication that engages communities in dialogue, by managing the information both sent to and received from beneficiaries and integrating beneficiary feedback into the decision-making process of programmes.

Statement of the Commitment

Enable two-way communication for engaging communities in dialogue, by managing the information both sent to and received from affected communities and integrating their feedback into decision-making process.

Key Actions

- Make provision for the affected population to express their needs and aspirations ensuring they are treated respectfully and provided with clear information on the assessment process and what happens next.
- Provide timely, accurate and life-saving information as aid to the affected people that contextualised in consultation with the local communities and integrated into the overall emergency actions.
- Ensure that response activities met the needs of the affected people and relevant; and the affected population are content of the selection criteria, entitlement, timeline of activities and project exit plan.

Feedback and complaint response: A complaints and feedback mechanism comprises a set of clear, transparent procedures that provide affected communities with access to a safe confidential means of voicing complaints on issues within the control of organisation. Issues raised by affected individuals touching on violations of human rights (such as sexual abuse or exploitation) may be received via the same mechanism, but there should be separate procedures developed for these. These mechanisms should be timely and should enable authorities and staff members to learn from the information, process it and adjust programming accordingly.

Complaints may be of two types such as non-sensitive and sensitive complaints. Sensitive complaints include (a) sexual exploitation and /or any type of abuse by a staff or volunteer, (b) fraud and /or corruption by a staff or volunteer, and (c) any action which constitute a breach of agency's and/or donor principles or code of conduct including staff behaviour. Experiences suggest that humanitarian agencies deal with both sensitive and non-sensitive complaints and are kept them confined within the agencies. They rarely share the complaints, especially the sensitive complaints, with the donor due to an absence of a clear line of reporting to the donors in the existing mechanism. This sometime weakens accountability to donor and discourage their participation in dealing with the sensitive complaints. Although, it is important for the humanitarian agencies to report sensitive complaints to donors within 24 hours from the accountability point of view, the study team viewed it somewhat difficult in the rapid response context. One option may be to include the phone number of donor focal person in the complaint registration mechanism, but the likelihood of misuse this facility by the affected people is very high. This might lead to generate mistrust and put the humanitarian agencies, thereby affecting the overall response. Hence, it is crucial for humanitarian agencies and donors to include the provision of reporting sensitive complaints in the partnership agreement, and use the technology to register the sensitive complaints in a separate IT interface database on daily basis which donor focal person can easily access.

Statement of the Commitment

A standard feedback and complaint tool needs to be developed to allow the people to file complaints/feedback in an anonymous manner. However, it may not ensure participation of the people in the complaint/feedback process. Humanitarian agencies should consider additional measures depending on the context to nudge users' participation in the mechanism.

Key Actions

- Establish and document feedback and complaints handling procedures in consultation with affected community with a clear procedure for submitting feedback and complaints; the steps taken and the right to receive a response.

- Register sensitive complaints in a separate IT interface database on daily basis and provide access of the donor focal person in the data.

- Ensure that intended affected communities, and its staff understand the feedback and complaints handling procedures and share report on feedback and complaints with affected community and stakeholders.

- Ensure that the communities understand the benefits of feedback and complaint response mechanism. To this end, the feedback and complaints response issue should be included in the Job Description and performance review of the senior management and frontline staff.

Learning and adaptation

The organisation uses the learning to continually develop its humanitarian quality and accountability systems. Without an option for adaptation based on the learning, a rapid response cannot ensure its accountability to the affected population. The organisation needs systematic approach to facilitate appropriate integration of any learning from their interaction and engagement with the communities.

Statement of the Commitment

Establish a process of continual improvement of the humanitarian interventions based on learnings and humanitarian quality standards including humanitarian principle, code of conduct.

Key Actions

- Ensure that the organisation regularly analyses monitoring and review data, as well as data from feedback and complaints mechanisms, to draw and document learnings from the programmes.
- Make a provision for continual improvement in the quality of response, beneficiary selection and promoting rights and entitlement of the affected community
- Ensure that lessons learned is part of the knowledge management system, and share throughout the organisational structure.
- Make a provision for peer review in terms of humanitarian quality standards by external expert agency.

4. SUGGESTED AAP TOOLS

Some tools are suggested to bridge between planning aid for humanitarian agencies to travel from general guidance of the commitments to operationalise the AAP elopements at an individual level. These tools are extracted from different humanitarian agencies' good practices. These are not mandatory to use; instead the humanitarian agencies can use their own similar tools that serve the purpose of these tools.

4.1. TOOLS FOR INFORMATION PROVISION

Tool 1: Information Disclosure Policy

The humanitarian organisation should have an Information Disclosure Policy that will reaffirm its commitment to transparency in all of its activities. It is therefore necessary to ensure that information about the organisation, its programmes and operations are available to the stakeholders. This policy describes how and what information the organisation will share proactively with the stakeholders and guides the staff what information (produced by or in the possession of the organisation) they can provide to the stakeholders. Also, it informs the stakeholders what they can expect or demand, in terms of information, from the organisation. Following is the suggested template for disclosure of information that SFB member agencies can consider to use.

Template for Information Disclosure Policy

1. Legal basis (on the cover)
(The legal basis of any policy is whether it is approved by the legitimate authority. This section may include Approving Authority, Date of Approval, and Date of Implementation)

2. Introduction
(It consists of a brief description of the organisation's activities, a commitment to freedom of information and a declaration of respect for the law.)

3. Definition
(The words and terms that need clear definitions and explanations will be described here. For example, what the organisation means by 'information' can be explained here.)

4. Disclosure of Information
(Information should be classified in order to manage them and to make them available to the stakeholders. It may include three types: Proactively disclosed information, information disclosed on demand, and information that need not be disclosed.)

5. Implementation Process
(The practical details of implementation should be described in this section. Who will implement the policy and how? How will information be collected and preserved? How will it be published?)

6. Information management
(The practical details of management of the information should be describe in this section. It should include: procedure of application and the time frame, procedure of appeal and time frame, and process of collecting and preserving information.)

7. Review of Policy
(This section provides guidelines about keeping information current and accurate.)

EXAMPLE: Information Disclosure Policy of Coast Trust available at http://coastbd.net/1228-2/

Tool 2: Staff Code of Conduct

The **PSEA Code of Conduct** provides clear guidance on the standards of behaviour in terms of Protection against Sexual Exploitation and Abuse (PSEA) the organisation requires from all staff. It is a key tool for the prevention of harassment, exploitation, abuse and/or inappropriate behaviour by staff. It is the responsibility of all staff to adhere to the Code of Conduct and its associated policies. Any breach of this Code of Conduct by a staff member may result in disciplinary action up to and including dismissal. Besides, there is a Code of for the International Red Cross and Red Crescent Movement and Non-governmental Organisations (NGOs) in Disaster Relief. It is a voluntary code, enforced by the will of the organisation accepting it to maintain the standards laid down in the Code.

Standards of Conduct in terms of PSEA

UN's Special Measures for Protection from Sexual Exploitation and Abuse prohibits certain behaviours. These standards are widely accepted as non-negotiable by the humanitarian community, including the NGO community:

- Sexual activity with children (persons under the age of 18) regardless of the age of majority or consent locally. Mistaken belief in the age of a child is not a defence.
- Sexual favours exchanged for any form of assistance, including food or non-food items.
- Use of children or adults to procure sexual services for others.
- Exchange of money, employment, goods or services for sex with prostitutes or any other member of the local population, visits to brothels or places which are declared off-limits.
- Sexual relationships between staff and those receiving assistance are strongly discouraged.
- Any suspicious of SEA by a fellow worker of the same or another agency must be reported via established reporting mechanisms.
- Staff are obliged to create and maintain an environment that prevents SEA, and managers are particularly charged with developing systems that enable this.

EXAMPLE

IASC suggested Staff Code of Conduct in terms of PSEA; available at
https://reliefweb.int/report/world/protection-sexual-exploitation-and-abuse-psea-inter-agency-cooperation-community-based

Annex 2 of Sphere Handbook 2018: The Code of for the International Red Cross and Red Crescent Movement and Non-governmental Organisations (NGOs) in Disaster Relief; available at
https://spherestandards.org/wp-content/uploads/Sphere-Handbook-2018-EN.pdf

Tool 3: Protection Against Sexual Exploitation And Abuse (PSEA) Policy

The organisation should have a **Protection against Sexual Exploitation and Abuse (PSEA) Policy** that aims to end sexual exploitation and sexual abuse including gender-based violence and child abuse by humanitarian workers, and ensure that allegations of SEA are responded to in a timely and appropriate manner. This Policy guides the staff how they will hold each other accountable for ensuring safe programming by preventing and

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Template for Protection against Sexual Exploitation and Abuse (PSEA) Policy

1. Legal basis (on the cover)
   a. Approving authority
   b. Date of approval
   c. Date of implementation of the policy

2. Purpose

3. Scope

4. Definitions

5. Guiding principles

6. Expected behaviours of the staff regarding SEA

7. Organisational responsibility to prevent SEA

8. Grievance system

9. Review and update

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addressing SEA in humanitarian assistance.

EXAMPLE

Protection against Sexual Exploitation and Abuse (PSEA) of AVI that is available at
https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=4&cad=rja&uact=8&ved=2ahUKEwj zrfOWy7zmAhVZAXIKHUs3ALkQFjADegQIAxAC&url=https%3A%2F%2Fwww.australianvolunteers.com%2Fa ssets%2FUploads%2FResourceFiles%2F09c9a5056f%2FPrevention-of-Sexual-Exploitaton-and-Abuse-PSEA-Policy-FINAL-September-2018.pdf&usg=AOvVaw2N8y1C1O7PnEwwEJZG0izs

Tool 4: Information Sharing Checklist

This Information Sharing Checklist guides the staff to share information with stakeholders. It has been prepared based on a document from Save the Children[19]. The checklist provides an outline of key relevant information that staff can share in different phases of the project either through informal discussions with community members or more formally through group discussions and community meeting.

Information Sharing Checklist

1. INFORMATION ABOUT OUR ORGANISATION
 ▪ What is our vision, mission and values?
 ▪ Why are we here?
 ▪ Where do we get our money?
 ▪ Staff code of conduct – behaviours towards the community you can expect from our staff
 ▪ How to provide feedback or raise concerns about our activities:
   – Why we set up a complaints mechanism?
   – What can people complain about?
   – Who can complain?
   – How and where?
   – Timeframe of response
   – Policy of non-retaliation - people who provide feedback and complain will not lose access to our services.
   – Confidentiality – we will do our best to keep the names of the complainants confidential, especially in cases of sensitive complaints.

2. INFORMATION ABOUT THE PROPOSED PROJECT
 ▪ Project name
 ▪ Target locations
 ▪ Timeframe (start and end dates)
 ▪ Project goals and activities
 ▪ Finances:
   – Who funds this project?
   – How much will the project contribute to the community?
   – What will the community agree to contribute (in cash or in kind)?
 ▪ Who will benefit from this project and how we propose to select them
 ▪ How many people can the project help?
 ▪ What will people receive and when (the deliverables)?
 ▪ Information on significant changes to the original project
 ▪ Progress reports – what is the progress this month and what is the plan for next?
 ▪ Summaries of evaluations

3. INFORMATION ON HOW PEOPLE CAN BE INVOLVED IN THE PROJECT   ▪ How local communities will be involved in the beneficiary selection processes? Dates and locations of the activities.   ▪ How local communities will be involved in monitoring and evaluation activities, especially those leading to programme changes? Dates and locations of the activities.   ▪ How community people will be involved in complaints & response mechanism? Dates and locations of the activities.   ▪ Contact details for general queries.

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[19] Programme Accountability Guidance Pack: A Save the Children Resource, Save the Children. Available at
https://resourcecentre.savethechildren.net/library/programme-accountability-guidance-pack-save-children-resource

4.2. TOOLS FOR PARTICIPATION

Tool 5: How to Analyse Affected Communities' Need

There is an established system for Joint Needs Assessment (JNA) in Bangladesh. The JNA is usually carried out by the Needs Assessment Working Group (NAWG) in a medium to large scale disaster. The humanitarian organisations carry out a needs assessment independently in localised disaster. It is often seen that humanitarian agencies have very limited time and resources for collecting comprehensive primary data particularly in the context of rapid response. Should they have basic secondary data and a framework for analysing the situation at alert stage, they would be able to precisely analyse the needs of the affected people within a short time. Validating the outputs of the secondary data analysis with the rapid assessment outputs provides a clear picture of the needs and priorities of the affected people.

This Checklist for Basic Data Archive and Situation Analysis Template provide a guidance to the staff members to maintain an archive of basic data and analyse the impact of the hazard more quickly. They also help them to understand the needs of the affected people more clearly. However, participation of the affected people in the needs analysis ensures credible information for analysis of the needs.

Checklist For Basic Data Archive

Demographic (among population)

1. **Total households:** Total number of households in the upazila**/**union/ward
2. **Total population:** Total population in the upazila**/**union/ward

   Female Population: …………………………….; Male Population: ………………………….;
3. **Population between 0 and 24 months old:** Total population in the age range of 0-23 months old in the upazila**/**union/ward

   Female Population: …………………………….; Male Population: ………………………….;
4. **Population between 2 and 5 years old:** Total population in the age range of 0-6 years old in the upazila**/**union/ward

   Female Population: …………………………….; Male Population: ………………………….;
5. **Population between 6 and 14 years old:** Total population in the age range of 7-14 years old in the upazila**/**union/ward

   Female Population: …………………………….; Male Population: ………………………….;
6. **Population between 15 and 64 years old:** Total population in the age range of 15-64 years old in the upazila**/**union/ward

   Female Population: …………………………….; Male Population: ………………………….;
7. **Population ages 65 and above:** Total population in the age range of 65 and above in the upazila**/**union/ward

   Female Population: …………………………….; Male Population: ………………………….;
8. **Population** Density (per sq. km)

Most Vulnerable Group (among population):

   Divorced (Nos): …………….; Widow (Nos): …………….; Pregnant woman (Nos): …………….; Lactating mother (Nos): …………….;

   Persons with disabilities (different types):

        Female (Nos): …………….; Male (Nos): …………….;

   Patients with HIV/AIDS

        Female (Nos): …………….; Male (Nos): …………….;

   Mobile populations

Female (Nos): ……………; Male: ……………; Girl Child (Nos): ……………; Boy Child (Nos): ……………;

Adolescent Girl (Nos): ……………; Adolescent Boy (Nos): ……………;

Poverty (among the population)

9. **Poverty headcount ratio (%):** Percentage of the population who lives below the official national upper poverty line.

10. **Extreme poverty headcount ratio (%):** Percentage of the population who lives below the official national lower poverty line.

Housing Structure

Jhupri (%): ……………; Katcha (%): ……………; Semi-pucka (%): ……………; Pucka (%): ……………;

Primary Employment (among working population)

Agriculture (%): ……………; Fishing (%):……………; Daily wage work (%):……………; Business (%):……………;
Industry (%): ……………; Services (%): ……………; Others (%): ……………;

WASH (among households):

11. **Sanitation**

Sanitary (water-sealed) in (%): ……………; Sanitary (non-water-sealed) in (%): ……………;

Non-sanitary in (%): ……………; Do not have latrine (%): ……………;

12. **Source drinking water**

Tap (%): ……………; Tube-Well (%): ……………; Pond (%): ……………;

Template for Situation Analysis

Date and time	:
Period covered	:
Type of hazard	:
Name of Agency	:

1. Overview of the disaster:
(Scale and intensity of the hazard; affected area; damage to live, property and environment; disruption of services; number of affected or distress people; how people are coping and response activities)

2. Highlights/details information:
(Affected areas; most and less affected upazila/union; total population in the affected area; total number of affected people (according to different age group of male, female, children, PWDs and other minority group); damage of infrastructure e.g. road, embankment, house, educational institutes, healthcare centre; specific information about environmental degradation, source of water and sanitation non-functioning, loss of livestock, poultry, crop, fisheries and household assets; information about death, injury, missing and displacement of the people)

3. Current Affected People's Needs:
*(Description of humanitarian **needs** of the affected people– food and nutrition, medical care, reproductive and sexual health, WASH, Shelter, household materials, Gender Based Violence, education & child protection)*

4. Current Responses:
4.1. Own agency
*(Description of humanitarian **Responses** currently undertaken by your agency. Explain sector of the assistances and their scale)*
4.1. Govt. agencies
*(Description of humanitarian **Responses** currently undertaken by govt. agencies. Explain sector of the assistances and their scale)*
4.2. UN, NGOs and other agencies
*(Description of humanitarian **Responses** currently undertaken. Explain sector of assistances & their scale)*

5. Gaps and further needs:
*(Descriptions of humanitarian **gaps and further needs** of the affected people – food & nutrition, medical care, reproductive health, WASH, Shelter, household materials, Gender Based Violence, education & child protection)*

6. Coordination
*(Describe the current **coordination** mechanism and the issues)*

7. Future Threat
(Describe the possibilities of further risk and damage induced by the disaster, future disruption and deterioration or otherwise)

8. Recommendations and Conclusion
(Include the possibilities of International Community engagement)

Tool 6: Checklist for Understanding Affected Community's Information Needs

This Checklist guides the staff to understand information need of the affected community. It also helps them to identify communication strategies. This Checklist has been prepared based on Question Sheet endorsed by IASC AAP/PSEA Task Team and REACH in 2018[20].

<div style="border:1px solid">

Checklist for Understanding Affected Community's Information Needs

1. **Men's, women's, girls' and boys' information needs and preferences**
   a. What type of information would they like to receive from aid providers?
   b. Who/where would they prefer to receive information from?
   c. What is their preferred means of receiving the information?
   d. Are they aware of any people who may be unable to access available information because of specific needs?
   e. Why were they unable to access available information?

2. **Men's, women's, girls' and boys' feedback preferences**
   a. How would they prefer to provide feedback to aid providers about the quality, quantity and appropriateness of the aid they will receive?
   b. How would they prefer to provide feedback to aid providers about the behaviour of aid providers?

3. **Men's, women's, girls' and boys' preferences for participating in decision making**
   a. Who makes decisions in their community about issues that affect the community as a whole?
   b. Do they feel like they have a say in decisions that affect their community?
   c. How important is it to them to be involved in decisions about their community?
   d. How would they like to be involved in decisions about the aid they will receive?

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[20]Menu of accountability to affected populations (AAP) related questions for multi-sector needs assessments (msnas), endorsed by IASC AAP/PSEA task team and reach in 2018. The document is available at https://reliefweb.int/report/world/menu-accountability-affected-populations-aap-related-questions-multi-sector-needs

Tool 7: Checklist & Guidance for Emergency Message to the Affected Community

The Checklist and Guidance help the staff to provide emergency messages that disaster affected communities need for accessing humanitarian services and mitigating their distress. It is necessary for the affected communities to get information about the basic humanitarian services that are provided by different agencies.

Guidance for Effective Emergency Messages

Information shared after an emergency should:

- **Be simple:** do not use too much text or too many images.
- **Communicate the threat:** be clear about the danger or risk if people don't follow the advice, e.g., "drinking flood water can make you sick".
- **Provide a call to action:** suggest practical actions, e.g., "wash your hands" or "get immunized". However, be careful that the information doesn't encourage people to take actions that are not practical or are against the culture or religion.
- **Be accessible:** in the language people speak, shared through channels they use and be conscious of literacy.
- **Reach as many people as possible.**
- **Never cause harm or create panic.** It is important to understand the risks and vulnerabilities people may face, especially in sensitive situations such as armed conflict. This is vital to ensure messages developed do not cause more harm, e.g., by advising people to do something that could be dangerous and make them unsafe.
- **Try to coordinate with others, if and when possible.**
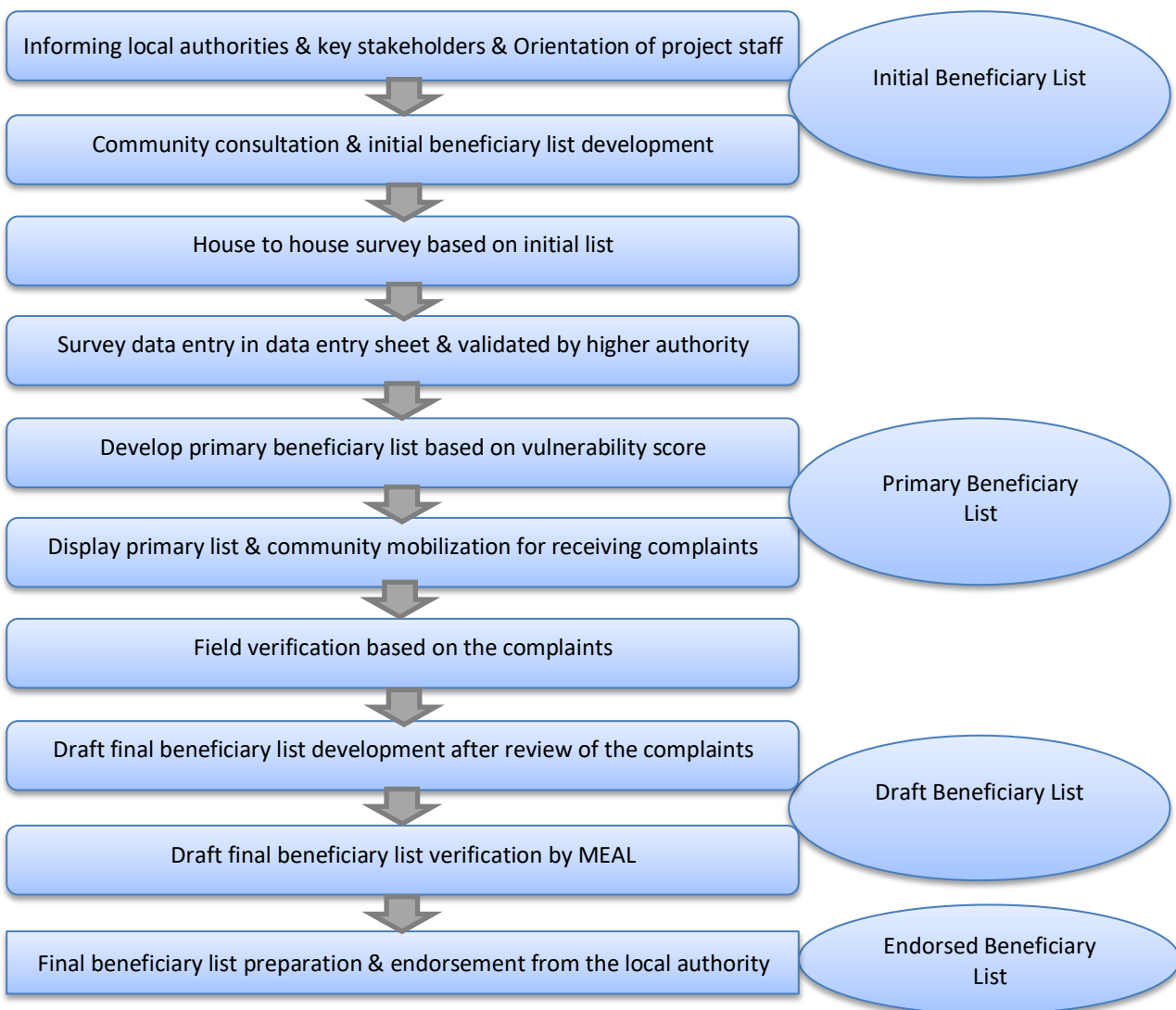
Checklist for Effective Emergency Messages

Specifically, the affected communities need to know about

- Entitlement to humanitarian assistance, for example
  - What the disaster affected HHs should get in terms of food and the quantities and qualities of food items?
  - What the disaster affected HHs should get non-food items in terms of quantity and quality of these items?
  - What the disaster affected HHs should get shelter support in terms of quantity and quality of this support?
- Ensuring access to water, sanitation and hygiene, for example
  - How people could have access safe water during disaster?
  - How people could use hygienic latrine during disaster?
  - How people could maintain hygiene practice during disaster?
- Receiving medical care, for example
  - How people could get medical treatment for illnesses during disaster?
  - How people could get preventative medical care during disaster?
- Continuing children's education activities, for example
  - How the affected communities could arrange learning session for children during disaster?
  - How the affected communities could restore education service during disaster?
- Ensuring children's and women's protection
  - How the disaster affected community could protect their children against neglect, abuse, violence or exploitation during disaster?
  - How the disaster affected community could minimize women's exposure to abuse, violence, exploitation and sexual harassment during disaster? Who are providing relevant services? Where?
- Providing feedback on humanitarian assistance, for example
  - How the disaster affected community could lodge complaints about quality, quantity or delivery process of humanitarian assistance?
  - How the disaster affected community could feedback on relevance, efficacy, timeliness or quality of humanitarian goods and services during disaster?

Tool 8: Guidance for Ensuring Community Participation in Beneficiary Selection Process

A transparent beneficiary selection process requires inclusive participation of community members. As well, it requires involvement of local authorities and key stakeholders. Through community consultation, an initial list of beneficiaries can be prepared which includes more than the actual number of beneficiaries. Then the number of beneficiaries in the initial list can be narrowed down to actual number through household survey and validation. Applying vulnerability criteria, a primary beneficiary list can be prepared and several copies of the list should be hanged in important public places, including Union Parishad, mosque, and grocery shop, introducing Complaint Response Mechanism (CRM). It is also important to consider the accessibility of women and person with disabilities to the information. After reviewing the complaints, draft beneficiary list should be verified. Final beneficiary list should be endorsed by the UP Chairman.

Process	List
Informing local authorities & key stakeholders & Orientation of project staff	Initial Beneficiary List
Community consultation & initial beneficiary list development	
House to house survey based on initial list	
Survey data entry in data entry sheet & validated by higher authority	
Develop primary beneficiary list based on vulnerability score	Primary Beneficiary List
Display primary list & community mobilization for receiving complaints	
Field verification based on the complaints	
Draft final beneficiary list development after review of the complaints	Draft Beneficiary List
Draft final beneficiary list verification by MEAL	
Final beneficiary list preparation & endorsement from the local authority	Endorsed Beneficiary List

Note: It is adapted from ACF's Operational Guideline for Cash Transfer Program (CTP)

Tool 9: Guidance for Promoting Community Readiness (Rights and Entitlements)

This Guidance helps the staff to aware the affected communities in terms of their rights and entitlement. This Checklist has been prepared based on the Manual on Volunteerism in Disaster Management developed by PROSHAR with technical support from NIRAPAD[21].

Serving the afflicted people

Poverty creates distress for the people. The poor families have limited income and assets and cannot obtain sufficient food, shelter, healthcare and other services. Therefore, it is extremely important to provide special support and social safety for ensuring wellbeing and welfare of these families.

Similarly, those who lose means of living due to disaster and suffer greatly should be taken care of by the society. The society must ensure their food, water, healthcare, sanitation, education and rehabilitation.

Poverty or disaster, regardless whatever may be the reason, the afflicted people have the right to access social services.

> Serving the afflicted people means meeting emergency needs of the distressed people selflessly and without expecting anything. The main aspect of serving the afflicted people is to ensure food, water, healthcare and shelter to the people who are suffering from starvation, thirst, illness and lack of shelter. It is evident that needs of the especially vulnerable people e.g. women, pregnant mother, lactating mother, children, PWDs, elderly and other minority groups are different.
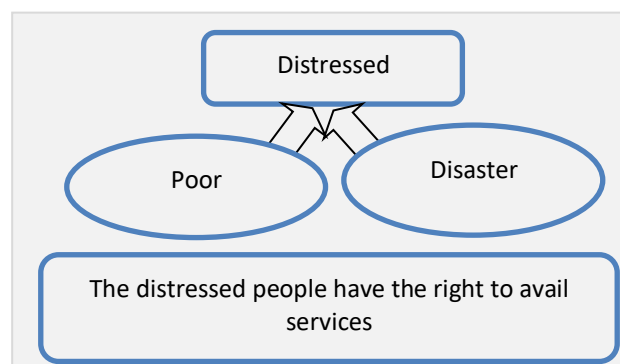
Rights and Standards of Humanitarian Assistance

Disaster affect people have the right to live with dignity, receive humanitarian assistance and safety and

protection. Basically it says availing whatever goods and services necessary for living in vulnerable conditions are the rights of disaster affected people. It is a duty for the humanitarian agencies to do whatever is needed for reducing the distress of the affected people and providing them a dignified life.

It is essential to meet the basic needs of the affected people to reduce their distress. The basic needs includes water, sanitation and hygiene practices; food security and nutrition; shelter, housing and non-food items; and health services.

Maintaining a minimum standard for meeting the basic needs is very crucial. The minimum standards are set on the basis of need for the goods and services and their quality and quantity, for maintaining a dignified life. The humanitarian organisations and agencies agree and accept the minimum standards for humanitarian assistance. These are universal standards and applicable for any given circumstances. Based on the context, sector specific indicators of minimum standards for different sectors are determined.

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[21]PROSHAR (2013), Manual on Volunteerism in Disaster Management.

Tool 10: Job Description of Humanitarian Accountability & Community Engagement Officer

1	DISCRIPTIONS	Humanitarian Accountability and Community Engagement Officer will support in implementation of programme accountability system and mechanism and ensure active participation of project stakeholders in the project development. S/he will work closely with programme team to ensure a comprehensive and robust accountability system that effectively captures the voice of the beneficiaries.

2   RESPONSIBILITIES AND TASKS

3	SUPPORT INFORMATION PROVISION	- Provide technical assistance to ensure that accountability framework is integrated throughout the project cycle management (need analysis, funding commitment, project design, implementation and peer review) - Support organisation to develop policy, guideline and tools relating to information provision. - Support the development of communication materials for the beneficiaries.
4	PROMOTE COMMUNITY PARTICIPATION	- Provide guidance to project staff for inclusive participation of the affected people. - Document how and whether the process promote community participation - Identify information and communication need of the affected communities - Support developing emergency message for the affected communities in coordination with humanitarian agencies - Promote readiness of the affected communities in terms of their rights and entitlements during disaster
5	SUPPORT FEEDBACK AND COMPLAINT MECHANISM	- Support establish complaints-handling procedures consulting with affected community. - Ensure that feedback is routinely recorded, reviewed and responded timely align with feedback mechanism guidelines. - Call beneficiary telephones number (randomly) and find out if they have indeed benefited from our assistance - Consolidate the satisfaction survey data obtained through communities' informal feedback
6	LEARNING AND ADAPTATION	- Document accountability findings, lessons learned, and good practices of the humanitarian interventions implemented by the organisation - Support organisation to conduct accountability self-assessment periodically and develop accountability action plan. - Provide weekly reporting on accountability to affected population and share it with the senior management team of the organisation. - Conduct a review of the AAP and highlight lessons learnt and good practices

4.3. TOOLS FOR FEEDBACK AND COMPLAINT RESPONSE

Tool 11: Guidance for Feedback and Complaint Response Mechanism

This guidance is intended to support the staff members in designing and implementation of a feedback and complaints response mechanism. It covers the steps we need to consider, the different mechanisms and how to analyse the complaints the organisation receives.

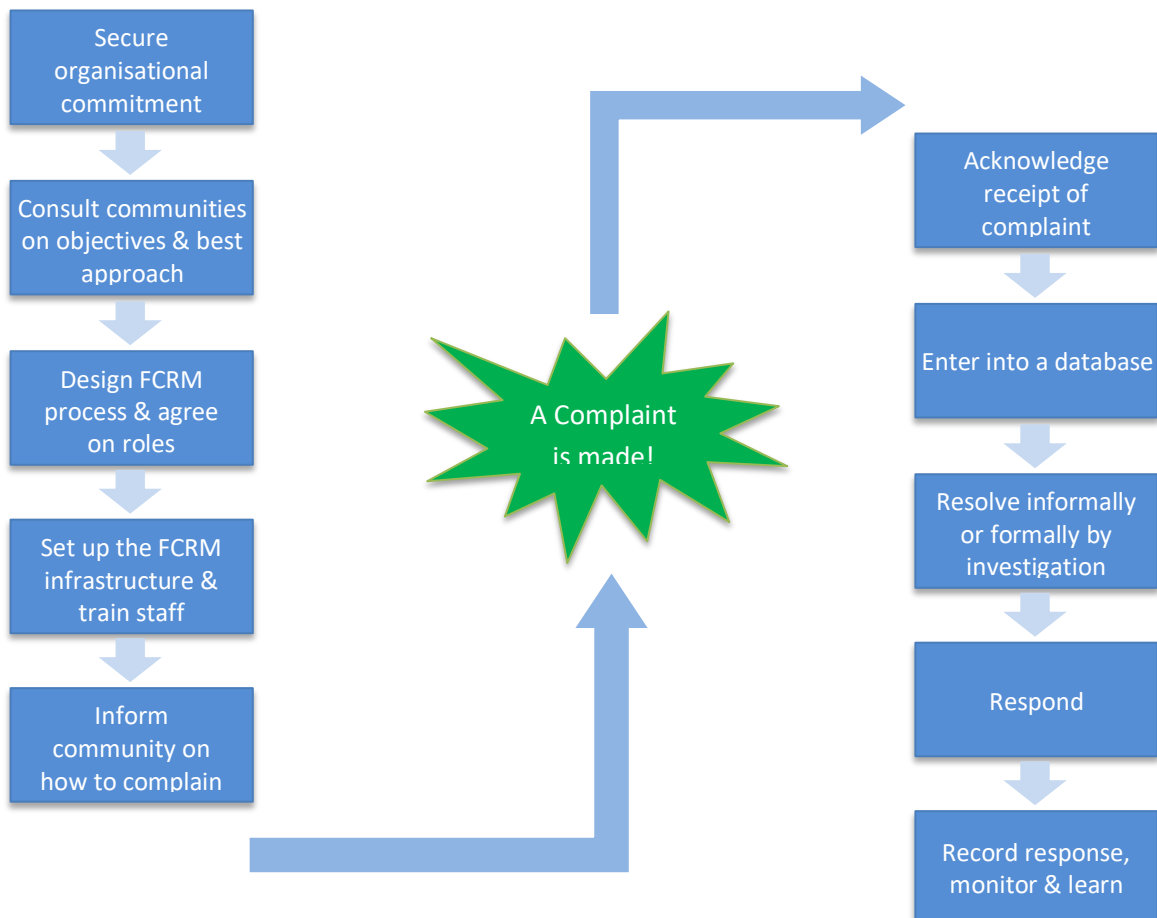### Template for Feedback and Complaints Response Guideline

1. Introduction
2. Governance and Management
3. Feedback and Complaints Mechanism
   3.1. Communication Channels
   3.2. Categorizing Communications
   3.3. Processing Complaints
   3.4. Decisions & Show Cause
   3.5. Closing The Feedback Loop
4. Guidance for Management of Complaints
5. Confidentiality and Protection
6. Complaint Record Form and Log Book

EXAMPLE
Complaint & Feedback Management Guidelines of Action Against Hunger/ ACF Bangladesh; Available at
https://drive.google.com/open?id=1wCr-triWKgdpflGvEP4Sl0SmgT4uuynn

Ten steps of setting up feedback and complaint response mechanism

Secure organisational commitment

Consult communities on objectives & best approach

Design FCRM process & agree on roles

Set up the FCRM infrastructure & train staff

Inform community on how to complain

A Complaint is made!

Acknowledge receipt of complaint

Enter into a database

Resolve informally or formally by investigation

Respond

Record response, monitor & learn

Tool 12: Serious Complaint Reporting Form

This Reporting Form is intended to support the staff member in sending serious complaints to the funding agency. A serious complaint is primarily related to breach of agency's Code of Conduct (tool 2). Serious complaints should be formally investigated with high respect to confidentiality. It must be reported immediately to funding agency. Serious complaints should be addressed by senior management team of the funding agency.

Serious Complaint Reporting Form

1. Serial No:	2. Time of complaint:	3. Date: …/…/ 20…
4. Name		☐ Anonymous
5. Location:	(a) District:	(b) Upazila:
	(c) Union:	(d) Village:
6. Mobile Number		7. Gender: ☐ Female ☐ Male ☐ Tran ☐ Anonymous
8. Complainant	☐ Beneficiary ☐ Suppliers ☐ Volunteers☐ Staff ☐ PNGO staff ……….. ☐ Others ………..	
9. Type of Serious Complaint	☐ Behaviour of the agency's staff member or volunteer ☐ Allegations of Sexual exploitation and abuse by agency's staff member or volunteer ☐ Allegations of harassment (physical, psychological) by agency's staff member or volunteer ☐ Allegations of fraud and corruption by agency's staff member or volunteer ☐ Criminal actions by agency's staff member or volunteer ☐ A complaint on an issue posing serious reputational risk	
10. Complained before whom?		
11. Complained by?	☐ Email ☐ Mobile phone ☐ Letter ☐ Verbal report ☐ Complaint box ☐ Other	
12. Details of Complaint:		
a) What is the complaint? b) Whom against the complaint is? c) Why s/he is complaining? d) When s/he observed that? e) How s/he came to know the fact? f) What is his/her expectation? g) Anything else … (extra notes):		
12. Action Taken by the Agency:		
13. Current Status:		

Tool 13: Tools for Community Feedback Collection (Satisfaction Survey)

This Checklist guides the staff to understand the satisfaction levels of the affected people with the humanitarian assistance provided by organisation. It helps the organisations to improve their humanitarian interventions.

Indicators	Very Unsatisfied	Not Satisfied	Fair	Satisfied	Very Satisfied
INFORMATION PROVISION					
Are you satisfied with the information about the organisation?	☹️	☹️	😐	🙂	😀
Are you satisfied the information about staff code of conduct?	☹️	☹️	😐	🙂	😀
Are you satisfied the information about the emergency project interventions (e.g. your rights & entitlements)?	☹️	☹️	😐	🙂	😀
Are you satisfied with the contents and format of information you received?	☹️	☹️	😐	🙂	😀
Are you satisfied with the media/ channel of information you received?	☹️	☹️	😐	🙂	😀
Are you satisfied with the behaviour of the staff who provided information?	☹️	☹️	😐	🙂	😀
PARTICIPATION					
Are you satisfied with your involvement in the needs assessment process?	☹️	☹️	😐	🙂	😀
Are you satisfied with the organisation's actions to take your views into account in project design?	☹️	☹️	😐	🙂	😀
Are you satisfied with local communities' involvement in the beneficiary selection process?	☹️	☹️	😐	🙂	😀
Are you satisfied with local communities' involvement in the delivery of humanitarian assistance?	☹️	☹️	😐	🙂	😀
Are you satisfied with the quantity of humanitarian assistance you received?	☹️	☹️	😐	🙂	😀
Are you satisfied with the quality of humanitarian assistance you received?	☹️	☹️	😐	🙂	😀
Are you satisfied with the speed in which the humanitarian service was deliver?	☹️	☹️	😐	🙂	😀
Are you satisfied with the behaviour of the staff who facilitated you?	☹️	☹️	😐	🙂	😀
FEEDBACK & COMPLAINTS RESPONSE					
Are you satisfied with the Feedback & Complaint Response Mechanism that established in consultation with you?	☹️	☹️	😐	🙂	😀
Are you satisfied with the ease of making feedback or complaints to the staff?	☹️	☹️	😐	🙂	😀
Are you satisfied with the ease of making feedback or complaints by feedback-complaint box?	☹️	☹️	😐	🙂	😀
Are you satisfied with the ease of making feedback or complaints by mobile phone?	☹️	☹️	😐	🙂	😀
Are you satisfied with the time taken to respond to your feedback or complaints?	☹️	☹️	😐	🙂	😀
Are you satisfied with the confidentiality of your personal information by the organisation?	☹️	☹️	😐	🙂	😀
LEARNING & ADAPTATION					
Are you satisfied with the initiative of the organisation on improvement of response interventions based on learnings?	☹️	☹️	😐	🙂	😀

Indicators	Very Unsatisfied	Not Satisfied	Fair	Satisfied	Very Satisfied
Are you satisfied with the documentation of good practices by the organisation?	☹	☹	😐	🙂	😄
Are you satisfied with the sharing process of relevant programme learning by the organisation?	☹	☹	😐	🙂	😄

4.4. TOOLS FOR LEARNING AND ADAPTATION

Tool 14: Case Study Template for Documentation of Good Practice relating to AAP Adaptation

This template helps the staff to document good practice of adaptation that incorporates a process of continuous learning and improvement. It helps the organisation in upscaling the humanitarian interventions. As well, this positive outcomes can be share with others so that a greater number of people can adopt it.

Case Study Template for Good Practice Documentation relating to AAP Adaptation

Title: Description of the adaptation practice in one simple sentence.

Context and Objective: This should provide the introduction for the practice and address the following issues:

1. What is the issue of adaptation?
2. What concerns were addressed by this adaptation?

Process and action: This part should answer the following:

1. What changes did you make based on community feedback?
2. When and where did you adapt this learning?
3. How did you change the activity?
4. Who were involved in this process?
5. How did you inform the changes to the community?

Result and achievement: Briefly describe how the organisation and community get benefits from this adaptation.

Tool 15: Accountability Assessment Checklist

This Checklist helps the staff to assess how well they are doing in terms of putting accountability to communities into practice. Further, it assists in the development of plans to support the organisation to improve in weak areas. It can be used as a baseline tool, and can be repeated at the end of the year to measure improvements in areas identified as priority.

S.N.	Indicators	Not in place/ not met/ never	Partially in place/partially met/sometimes	In place/ met/ always
1. INFORMATION PROVISION *Does the organisation keep communities/key stakeholders informed about their organisation and programme activities in ways that are accessible and appropriate to the context?*				
	The organisation consults and agrees with communities/ key stakeholders on the best ways of making information available, appropriate to the programme context and situation.			
	The organisation ensures that communities/key stakeholders are informed about the organisation's background, mission and values, and about the conduct they can expect of its staff and representatives (in line with the code of conduct and child safeguarding Policy) and how to contact the organisation.			
	The organisation informs communities/key stakeholders about specific programme goals, activities, cost, beneficiary selection processes and reports on progress.			
	The organisation informs details on how to give feedback or make complaints related to the organisation or specific programme activities are made available to communities/key stakeholders.			
	The organisation monitors how well information is being disseminated, understood and received through consultation with communities/key stakeholders.			
2. PARTICIPATION *How much are communities/key stakeholders involved in decision-making processes of the organisation?*				
	The organisation encourages and facilitates on-going participation from communities/key stakeholders throughout the programme especially in design and implementation.			
	The organisation achieves quality in its participation practice in line with its practice standards or the CHS requirements for effective participation (e.g. community participation is informative, voluntary, respectful, relevant, inclusive, supported by training, safe and accountable).			
	The organisation includes communities/key stakeholders in the identification and selection of appropriate representatives for specific programmes.			
	The organisation makes particular effort to identify community vulnerabilities and include groups less accessible or those facing additional risk or challenge.			
	The organisation encourages the involvement of communities/key stakeholders in regularly reviewing, monitoring and evaluating the performance of programme activities.			
	The organisation makes clear to its staff its expectations on community participation (i.e. that participation should happen across the project cycle and adhere to participation practice standards), and the organisation supports its partners in meeting these expectations.			
3. HANDLING FEEDBACK AND COMPLAINTS *Does the organisation have safe and accessible ways to ensure that children/ communities/key stakeholders can make suggestions, raise concerns or make a complaint about the decisions or actions of the organisation? does the organisation ensure that concerns/complaints are received, heard, reviewed and acted upon in a timely manner?*				
	The organisation or the programme has established an appropriate complaints and feedback mechanism, which has been agreed with communities/key stakeholders, which is impartial, timely, safe, confidential, and accessible for various groups.			

S. N.	Indicators	Not in place/ not met/ never	Partially in place/partially met/sometimes	In place/ met/ always
	Staff know how the complaints and feedback mechanism works and understand their responsibility to it, especially with regards to procedures for handling sensitive complaints (e.g. allegations of abuse and corruption are immediately referred/linked into the organisation's internal procedures for dealing with breaches of the PSEA Policy & code of conduct).			
	Communities/key stakeholders are aware of the complaints and feedback mechanism, how to access it, and what complaints can and can't be handled by the system.			

4. STAFF COMPETENCIES AND ATTITUDES

Does the organisation provide appropriate induction and training to ensure staff skills, attitudes and conduct are in accordance with the organisation's values and commitments? Does this induction and training support staff to interact with children/communities/key stakeholders in a respectful way?

S. N.	Indicators	Not in place/ not met/ never	Partially in place/partially met/sometimes	In place/ met/ always
	Relevant position advertisements and job descriptions encourage competencies in accountability to communities/ key stakeholders and their participation in the programme cycle.			
	Staff have clear job descriptions.			
	Staff know their responsibilities in upholding the commitments made by the organisation to communities/ key stakeholders with regards to the programme; further, staff know the code of conduct, PSEA Policy, and the principles of accountability and participation.			
	The organisation has a performance management process that ensures – through regular performance reviews, appraisals, etc. – that staff are performing well technically and behaviourally, including delivering on accountability to communities and in community participation.			
	Capacity-building support and training are provided to staff on technical issues related to their roles, as well as on accountability and participation.			

5. LEARNING & ADAPTATION

Does the organisation have systems in place that enable lessons to be captured and to be applied within the organisation and throughout the programme cycle?

S. N.	Indicators	Not in place/ not met/ never	Partially in place/partially met/sometimes	In place/ met/ always
	The organisation actively seeks and includes the views of communities/key stakeholders in its monitoring and evaluation exercises, in relation to programme activities and to staff conduct.			
	The organisation regularly reviews monitoring and evaluation data, as well as data from feedback and complaints mechanisms, to draw and document learning from the programmes.			
	As a result of the findings of programme reviews and evaluations and feedback/complaints from communities, the organisation adapts and modifies the way it works accordingly.			
	The organisation documents and shares findings of monitoring and evaluations with all staff and partners and external forums where necessary/appropriate.			
	The organisation shares relevant programme learning and plans for improvement with communities/key stakeholders in an accessible manner.			

Tool 16: Accountability Planning Checklist

This Checklist helps the staff to make a plan for improvement of accountability practice in humanitarian interventions. It helps them to integrate accountability to the affected population in their works systematically.

Accountability Elements	Action needed	Timeline	Responsible
Information Provision			
Participation			
Feedback and complaints response			
Learning and adaptation			

5. RECOMMENDATIONS

In order to operationalise the AAP framework, the study team have generated some recommendations for humanitarian agencies such as humanitarian coordination forum/ network, implementing NGOs, and funding agencies.

For Humanitarian Coordination Forum/Network

- Clarify humanitarian agencies that this AAP framework is not a new set of standards (like Sphere, CHS), but incorporates some elements of these existing standards and facilitate operationalise the AAP actions and tools.

- Pilot suggested AAP actions and tools to test the efficacy in demonstrating accountability to the affected people. It requires guidance from Humanitarian Coordination Forum/ Network to the senior leadership of piloting agency to workout mechanism. Based on results of piloting, the AAP actions and tools can be rolled out at wider scale.

- Influence humanitarian agencies to incorporate issues in the needs assessment tools for capturing affected communities' information needs. This will enable humanitarian agencies to deliver information as Aid to the affected communities.

- Support humanitarian agencies to develop communication skills of their front-line staff so that they can effectively communicate appropriate information including emergency messages with affected people.

- Support humanitarian agencies to develop contents and formats and identify appropriate communication channels and processes to disseminate key information and emergency messages to the affected people.

For Implementing Agencies

- Deploy a dedicated person of quality and accountability whose job would be to support implementation of humanitarian accountability system and mechanism, including information provision, community participation, feedback and complaint response and learning and adaptation.

- Improve front-line humanitarian staff's understanding of the concepts, tools and processes of humanitarian accountability. This will help them to demonstrate accountability to affected population in humanitarian settings.

- Ensure that staffs are well informed and trained on safeguarding and protection against sexual exploitation issues.

- Conduct peer review in mid-term and after the end of project combining internal and relevant external experts focusing on accountability elements outlined in the AAP framework. Peer review only by own staff may overlook some important aspects. Involving external experts can increase the credibility of the review findings and strengthen accountability to affected people and other stakeholders.

- Put in place a system of periodic self-audit, internal peer review, and reflect the responsibilities in staff's job description and performance review. This will enhance active participation of the affected people in the feedback and complaint response mechanism as well as other components of project cycle.

- Make publicly available the findings of peer review, and evaluations in appropriate format to the stakeholders, including the affected people and local government members. This could be one of the good practice of demonstrating transparency and accountability to the affected people and stakeholders.

- Create a provision for emergency funding to initiate rapid response to provide lifesaving support to the affected people without waiting for donor funding.

- Contextualise emergency messages using appropriate format in collaboration with other humanitarian agencies at local level prior to an emergency. These messages need to be updated periodically. This will contribute to reduce distress of the affected population.

For Funding Agencies

- Integrate accountability elements into funding agencies' monitoring and evaluation framework. This can enhance the obligation of the implementing agencies to meaningfully engage affected population in information provision, feedback and complaint response and learning process.

- Make a provision of incorporating accountability elements in the project funding proposal format, ensuring budget for implementing proposed activities relating to accountability as well as quarterly/bi-annual review of budget.

- Introduce a system of auditing accountability in humanitarian response. This will reinforce implementing agencies to implement AAP elements properly.

- Include a clause in the in the partnership/contract agreement clearly specifying the provision of reporting sensitive complaints within 24 hours.

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