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Scoping Study on **Humanitarian Accountability Mechanisms** in Bangladesh

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Executive summary

BBC Media Action was commissioned by UNOPS to conduct explorative research on the existing humanitarian accountability mechanisms implemented across Bangladesh. Based on a review of existing literature and qualitative research with practitioners and communities, the study provides recommendations on how humanitarian accountability systems in Bangladesh could be improved.

Findings from the field sites studied suggest that, generally, accountability mechanisms outside of the Cox's Bazar refugee response are not currently delivering the levels of effective beneficiary accountability that international standards and best practice guidance strives to achieve. Work in Cox's Bazar appears to be adhering somewhat more closely to the desired standards – although there are still gaps.

The gaps identified are, in general, not due to a lack of commitment or ambition, but due to difficulties in operationalising these commitments. This is, in large part, due to a mismatch between the policies and processes that humanitarian agencies have put in place and the ground reality of implementing those processes at field level. This gap exists principally because of:

- Low capacity of local NGOs in terms of managing accountability mechanisms – many smaller and local NGOs don't have their own accountability mechanisms in place. For those who do, local staff and volunteers often do not fully understand how the systems work. A lack of resources to implement accountability systems – particularly outside of the Rohingya response – compounds this issue.
- Inappropriate mechanisms being used – complaint boxes, which are still often used outside of the Rohingya response, are ineffective. People prefer to give feedback to field level volunteers and staff, who are often not equipped to resolve or refer these complaints due to lack of documented processes.
- Community understanding their rights and entitlements or how feedback mechanisms should work – both within and outside the Rohingya response, there is limited awareness or understanding of communities' rights to participate in and give feedback about humanitarian activities; and the systems available to them to do so.
- The wider governance context – NGOs are operating within a challenging context of corruption and lack of effective local governance in which people may not give complaints because of fear of harassment or omission from the current or future relief distributions.

Recommendations

- Support humanitarian organisations to strengthen their own accountability mechanisms, including understanding the concepts of accountability; ensuring that the right tools, systems and skills are available within their organisations; and providing access to sufficient resources to support their accountability efforts.
- Enhance the role of local volunteers and local community groups in delivering an accountable humanitarian response, recognising that affected populations are enthusiastic about face-to-face communication channels involving members of their own community, and the value that effective involvement of community groups in planning and delivering a response can bring.
- Improve consistency in data collection and introduce mechanisms that help humanitarian actors make more data-driven decisions.
- Increase the predictability and consistency of CRFM, thus increasing the level of trust that beneficiaries place in these systems and providing humanitarian actors with better data about community concerns to make programme decisions.
- Support humanitarian actors to communicate more effectively with communities around principles guiding humanitarian action, what they can expect from their organisation, and how they can expect complaints and feedback to be dealt with. And, bring humanitarian actors together to advocate for particular policy-level enablers that will enhance accountability practice.

Introduction

BBC Media Action was commissioned by UNOPS to conduct explorative research to better understand the accountability mechanisms currently or recently implemented by humanitarian actors across Bangladesh, and to identify what works and what gaps exist in applying existing accountability mechanisms in humanitarian crises. Based on research with practitioners and communities affected by crises, the study intends to provide recommendations on the best approach to implementing humanitarian accountability systems in Bangladesh.

This research was designed to reflect communities' experiences and their perspectives and understanding of how humanitarian agencies aim to be accountable to them, as well as incorporating perspectives from staff of local and international NGOs.

This study focuses on four aspects of humanitarian accountability, which are also well articulated within the Core Humanitarian Standard:

- Beneficiary selection (as part of establishing and delivering on commitments)
- Information provision
- Participation
- Complaints and feedback

The study was conducted with the aim of providing recommendations for accountability mechanisms in Bangladesh, not to evaluate humanitarian agencies' work, and as such individual organisations should not be identifiable from this report.

Primary research for this study deliberately focuses on Bangladeshi communities affected by crisis, as much is already known about accountability in the Rohingya response. The primary research was conducted in three different areas: Cox's Bazar (host communities affected by the Rohingya influx), Dhaka (slum dwellers affected by fire) and Kurigram (communities affected by 2017 monsoon flooding). These locations allowed us to explore how accountability mechanisms have worked across three different types of emergency, which have experienced different scales of humanitarian response.

This report brings together findings from analysis of this newly collected data, alongside insights from the existing research that has already been carried out within the Rohingya response and other third-party literature.

About BBC Media Action

Media and communication can be powerful forces for positive social change, providing a highly cost-effective means of facilitating the exchange of information and ideas between large numbers of people and playing a key role in changing the attitudes, behaviours and norms of both mass and policy-making audiences. BBC Media Action's work addresses key themes of: governance and rights, health, resilience and humanitarian response. We use mass media and outreach to achieve impact at scale and have special expertise in working in fragile and conflict-affected societies and environments where political, security or other factors mean that media is one of the few options available to reach and engage marginalised groups.

Established in 1998, BBC Media Action is the international charity of the BBC. Working with media and communication to help reduce poverty and support people in understanding their rights, our aim is to inform, connect and empower people around the world. BBC Media Action reaches some 200 million people through local broadcast partners, BBC channels (especially the BBC World Service), online, mobile and print platforms and through interpersonal communication. Research is critical to our work; and our award-winning Research & Learning Group has delivered research in 42 languages across 37 countries, including closed and conflict-affected states.

We are part of a trusted, respected global broadcaster. This enables us to develop strategic relationships with national and local broadcast partners in the countries where we work. Our BBC links also allow access to extensive local media knowledge and cultural insights: the BBC World Service delivers programming in 28 languages and the BBC has a total of 81 bureaux around the world. This is an invaluable resource in enabling BBC Media Action to respond rapidly to crisis situations. The BBC is trusted by people across the globe, from the household and village level, through to heads of government. This means we can bring diverse groups of people together to solve issues in a way many other organisations cannot. It also means that people trust our outputs and the information we provide.

BBC Media Action has 15 years' experience working in Bangladesh, carrying out research with urban and rural communities all over the country, and more recently with Rohingya refugees living in Cox's Bazar. With strong understanding humanitarian accountability and the current situation in Bangladesh, and a strong team of dedicated national researchers with significant humanitarian experience, BBC Media Action was well placed to conduct this study.

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Research study methodology

Scope of the research

BBC Media Action has conducted this explorative research to better understand the accountability mechanisms currently or recently implemented by humanitarian actors across Bangladesh, how humanitarian agencies are responding to the concerns of the communities that they serve and to identify what works and what gaps exist in applying existing accountability mechanisms in humanitarian crises. Based on a review of existing literature and primary research with practitioners and communities affected by crises, the study provides recommendations on the best approach to improving humanitarian accountability systems in Bangladesh.

Research objective

Research objectives of the study were:

- Objective 1: To explore the existing accountability mechanisms used by the humanitarian organisations/agencies/stakeholders.
- Objective 2: To understand the views and experiences of affected populations with humanitarian accountability mechanisms.
- Objective 3: To identify gaps and challenges in applying existing accountability mechanisms among humanitarian organisations/agencies.
- Objective 4: To provide recommendations to design a National Accountability Mechanism.

Research methodology

A desk review was carried out for context and to inform the design of primary data collection. For the purposes of collecting primary data, a qualitative research method was used to conduct the study and was explorative in nature. The data collection process included focus group discussions and community consultations¹ with people affected by crisis. In-depth interviews were conducted with humanitarian practitioners actively participating in the respective humanitarian responses and with beneficiaries who had received humanitarian assistance. In-depth interviews with elected members of union parishads and a pair-depth interview with community committee members were also conducted.

The target group for the primary research was communities who had recently been in receipt of humanitarian assistance and the humanitarian practitioners who had supported these communities. Both male and female participants were invited for this study. The age group of the participants was above 18 years.

The primary research participants were selected following purposive and snowball sampling techniques. To recruit participants from the communities, the researchers took the support of local fixers. To recruit humanitarian practitioners at field and head office level, the researchers took support from Start Fund Bangladesh, UNOPS and DFID.

Field-level data collected from affected communities and practitioners was analysed and shared with national-level representatives of humanitarian agencies and umbrella groups at a participatory discussion in Dhaka. The participants of the participatory discussion gave their feedback on the research findings.

¹ Community consultations were larger gatherings of people from affected areas, male and female together, designed to allow for a wider, less structured discussion about the experiences of the community than was possible in focus group sessions.

Primary research location selection

Primary research was conducted in three different locations:

- **Rural areas of Kurigram district situated in Rangpur division**
Kurigram is one of the districts in Bangladesh affected by the monsoon floods in August 2017
- **Rural areas of Cox's Bazar district situated in Chattogram division**
As a result of the Rohingya influx in August 2017, the host community in Cox's Bazar are affected as well. Several organisations have already carried out assessments related to accountability for the Rohingya community, but information about how these systems are working among the host community is largely missing
- **A slum area in Dhaka city**
A slum in Dhaka that had experienced a fire and where an NGO was responding

Limitation of the primary research

- With the limited available time, this study is not comprehensive. Accountability practices were only investigated for some organisations and therefore the findings may not be representative of the whole sector. However, this study has analysed a substantial amount of data from different studies conducted on accountability mechanisms in the Rohingya response and so there is more confidence about findings in that context.
- Regarding complaint, feedback and response mechanisms, this research focused on beneficiaries, but not other stakeholders like local journalists, local leaders, teachers, etc
- Implementation of humanitarian response programmes is dependent on governance structures and local administrations but, owing to time constraints, primary research was not able to fully examine how these systems interact with the humanitarian response programmes.
- Owing to time, constraints this study did not examine the rapid assessments completed at the start of these crises (Joint Needs Assessments).

Limitations and challenges of fieldwork

- Accountability mechanisms for different humanitarian responses may require different approaches depending on the nature, characteristics and location of the crisis. Due to limited time, this study was only able to directly explore accountability mechanisms used in three humanitarian responses in Bangladesh.
- The study may have benefited from more discussion groups and interviews with a broader spectrum of beneficiaries and community members to understand more nuanced differences between different sub-groups and how they experienced these accountability mechanisms.
- Finding participants (community members and beneficiaries) was challenging as the study team did not have information on the exact catchment areas of the projects until reaching the field and did not have access to beneficiary lists of the NGOs involved.
- Recruiting, arranging and conducting interviews within the time available for fieldwork was challenging. In particular, NGO practitioners had a lot of time limitations therefore it was challenging to arrange an interview with them.
- After conducting interviews with some of the beneficiaries and community members, the researchers realised that there was a need for some additional interviews with other relevant stakeholders in order to obtain a proper understanding of the bigger picture. It was difficult finding these participants and arranging the interviews.
- Managing time from Union Parishad members was a challenge. In Cox's Bazar, it was not possible to interview the UP member as the environment did not seem welcoming and safe. In Kurigram, it took a lot of time to manage an appointment from the member.
- Female participants in Cox's Bazar had difficulties understanding the language of the researchers and a translator had to be used so that interviews could be conducted in the local dialect.

- In Cox's Bazar, female respondents refused to participate in community consultations with men and separate community consultations had to be conducted.
- As the response to crisis in Kurigram ended some time ago, some of the participants struggled to recall some information.
- As the FGDs, community consultations and IDIs were conducted in local people's houses, people from the neighbourhood sometimes thought the researchers were carrying out a listing of community members in order for them to receive aid in the future. Many people therefore wanted to join the FGDs and community consultations once they had started. Managing people's expectations and the large numbers of people gathered was challenging for the researchers.
- Extreme weather conditions (excessive heat) made things more difficult for both participants and researchers.

Context and prior research

Humanitarian accountability – what is it and why is it important?

Global commitments were made at the World Humanitarian Summit in 2016 under the 'Grand Bargain' to increase transparency, participation and accountability to people affected by crisis. This 'Grand Bargain' is an agreement between over 30 of the biggest donors and humanitarian aid organisations which aims to "get more means into the hands of people in need." Signatories to the Grand Bargain have committed to ten goals, many of which are linked to accountability. These include greater transparency; more support and funding for local and national responders; increasing cash programming and including people receiving aid in making the decisions which affect their lives.

Prior to this agreement, it has long been recognised that humanitarian agencies have a responsibility to be accountable to the communities they aim to serve. The Humanitarian Accountability Partnership (HAP) 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.'*²

This approach recognises that, in a humanitarian response, there is a power imbalance where communities affected by crisis often have no formal control or influence over the humanitarian agencies working to support them. Communities do not vote for and usually have no say in what support they will be offered, and by which agencies.

The Core Humanitarian Standard on Quality and Accountability³ (CHS), which is now included within the latest Sphere⁴ guidelines, sets out nine commitments that humanitarian agencies should make to communities affected by crisis. Two of these commitments are specifically focused on community engagement and accountability:

- CHS Four: Communities and people affected by crisis know their rights and entitlements, have access to information and participate in decisions that affect them.
- CHS Five: Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints.

Humanitarian accountability and the aspects that define an 'accountable organisation' are defined differently by different organisations.

² Humanitarian Accountability Partnership (2010) *The 2010 HAP Standard in Accountability and Quality Measurement*. Available: <https://www.chsalliance.org/files/files/Resources/Standards/2010-hap-standard-in-accountability.pdf>

³ CHS Alliance, Group URD and Sphere Project (2014) *The Core Humanitarian Standard on Quality and Accountability*. Available: <https://corehumanitarianstandard.org/the-standard>

⁴ Sphere (2018) *The Sphere Handbook – Humanitarian Charter and Minimum Standards in Humanitarian Response*. Available: <https://handbook.spherestandards.org/en/sphere/#ch001>

The HAP Standard benchmarks⁵ try to help place accountability to affected populations at the heart of humanitarian action. They are:

Establishing and delivering on commitments	The organisation sets out the commitments that it will be held accountable for, and how they will be delivered.
Staff competency	The organisation ensures that staff have competencies that enable them to meet the organisation's commitments.
Sharing information	The organisation ensures that the people it aims to assist, and other stakeholders, have access to timely, relevant and clear information about the organisation and its activities.
Participation	The organisation listens to the people it aims to assist, incorporating their views and analysis in programme decisions.
Handling complaints	The organisation enables the people it aims to assist and other stakeholders to raise complaints and receive a response through an effective, accessible and safe process.
Learning and continual improvement	The organisation learns from experience to continually improve its performance.

Specifically looking at community feedback mechanisms, an in-depth literature review by ALNAP⁶ identified key elements that influence the effectiveness of a feedback mechanism:

- Trust in the feedback mechanism and the organisation that runs it
- Location of the feedback mechanism within the organisation, as a part of broader processes rather than stand-alone components
- The existence of dedicated resources to support the feedback mechanism
- Designed flexibly and adaptably, in line with community preferences – in particular:
 - Basing systems on what exists already and how people prefer to give feedback
 - Building on existing local or traditional communication and dispute resolution mechanisms, strengthening them as appropriate
 - Adapting tools to the local context
 - Integrating existing feedback channels with any new channels to be introduced
 - Assessing whether the mechanism is working and adapting it as the context, programmes and services being delivered change

Globally, studies have overwhelmingly found that communities affected by crisis prefer to give feedback face to face⁷. The diagram below is from a Ground Truth Solutions study⁸, pulling together data from interviews they undertook across seven major humanitarian responses in 2018, showing that communities prefer to make complaints face to face.

⁵ Humanitarian Accountability Partnership (2010) *The 2010 HAP Standard in Accountability and Quality Measurement*. Available: <https://www.chsalliance.org/files/files/Resources/Standards/2010-hap-standard-in-accountability.pdf>

⁶ Bonino F. and Warner A. (2014) What makes humanitarian feedback mechanisms work? Literature review to support an ALNAP–CDA action research into humanitarian feedback mechanisms. ALNAP Working Paper. London: ALNAP/ODI

⁷ For example: CDAC Network study on communication with communities from Nepal (<https://reliefweb.int/report/nepal/are-you-listening-now-cdac-network-briefing-paper>) and Typhoon Haiyan Learning Review (<https://reliefweb.int/report/philippines/cdac-network-typhoon-haiyan-learning-review>)

⁸ Nick van Praag (2019) Blog: Time to act on what affected people tell us about humanitarian hotlines. <https://groundtruthsolutions.org/2019/05/06/time-to-act-on-what-affected-people-tell-us-about-humanitarian-hotlines/>

How would you prefer to make any complaints you have? (n=4167)



63%

Face to face



17%

Community meetings



12%

Phoneline



8%

Complaint box

Findings from several other studies from different humanitarian responses also suggest beneficiaries' preference towards face to face communication.

	Rohingya response in Cox’s Bazar (Christian Aid and Gana Unnayan Kendra) ⁹	Earthquake response in Nepal (CDAC Network) ¹⁰	Hurricane Maria Response in Dominica (CDAC Network) ¹¹
Preferred	Speak with Mahji (Female 38.7%, male 34.6%)	Face to face ^a	Face-to-face ^c
	Voice recorder (Female 22.7%, male 41.3%)		
	Speak with NGO staff (Female 19.6%, male 1.1%)		
Least Preferred	SMS (Female 0.5%, male 0.6%)	Radio ^b	Social media ^d
	Call a phone number (Female 0%, male 0.6%)		
	Complain/feedback box (Female 0%, male 0%)		
^a There was a preference in most contexts for face-to-face information exchanges and discussion, especially for information that was more personally relevant as people sought to rebuild their lives and communities, and this was the most trusted channel.			
^b Rarely had people heard about relief distributions on the radio, although agencies used this medium for this purpose.			

⁹ Cristian Aid and Gana Unnayan Kendra (2018), Accountability Assessment Rohingya Response Bangladesh. Available from https://reliefweb.int/sites/reliefweb.int/files/resources/caid-guk_cvb_response_accountability_assessment_feb_2018.pdf

¹⁰ Are You Listening Now? The challenge to humanitarian aid of communicating with people affected by disaster, A Briefing from the CDAC Network. Available from https://reliefweb.int/sites/reliefweb.int/files/resources/Are%2Byou%2BListening%2BNow%2BBriefing%2BPaper_LR.pdf

¹¹ A learning review of Communications and Community Engagement during the Hurricane Maria Response in Dominica, CDAC Network. Available from <http://www.cdacnetwork.org/contentAsset/raw-data/4ff05ee5-d604-4c23-a16e-9d1aa2acb5db/attachedFile>

^c Face-to-face community meetings and visits were preferred, once access became possible.

^d There was a reluctance to use social media such as Facebook for information provision, partly due to the time required to update and post current information.

What does humanitarian accountability look like in Bangladesh?

For a long period of time after the independence of Bangladesh in 1971, the state has been known to struggle in assisting the poor or reduce poverty, while Non-Government Organizations (NGOs) grew dramatically, ostensibly to fill the gap. There are numerous and bigger NGOs in Bangladesh compared with any other country of equivalent size. As such, NGOs play an important role in the development process of Bangladesh. Success models of some big NGOs in Bangladesh in the areas of micro credit, non-formal education and primary healthcare are being replicated in other developing countries.

In Bangladesh, NGO accountability has both internal and external proportions. Externally, NGOs are accountable to the government and donors. Internal accountability mechanisms include a governing body and an executive committee. A system of 'downward accountability' to beneficiaries was previously absent¹². However, more recently, some organisations and umbrella bodies have been establishing frameworks for accountability to communities. Within the development space, these include the code of conduct put in place by the Association of Development Agencies in Bangladesh (ADAB)¹³. Many of the major international NGOs and UN agencies present in Bangladesh also operate their own accountability standards and systems.

In the humanitarian field, accountability to affected populations is an increasing priority for actors in Bangladesh. Several of the larger national NGOs joined the Humanitarian Accountability Partnership and have continued to be members of the successor body – the CHS Alliance – which now includes 11 Bangladeshi national members. The Humanitarian Coordination Task Team¹⁴ work plan for 2019 has prioritised the creation and adoption of a 'system for ensuring humanitarian assistance's accountability to affected populations' as one of four key priorities for the year, highlighting the need for strengthened community engagement initiatives to promote accountable and quality interventions that support actual needs of the affected people. And the National Association of Humanitarian Actors in Bangladesh has prioritised accountability in its 2019 strategic planning and has published guidance for its members seeking to provide benchmarks that indicate effective and appropriate accountability practice¹⁵. In 2017, Shongjog (the national multi-stakeholder platform for communication with communities) collated and analysed community feedback from a range of different sources during the initial response to the monsoon floods; and has advocated to ensure that the importance of community engagement and accountability are reflected in national policy, through a revision to the government's Standing Orders on Disaster.

Despite the increasing priority being placed on the subject, there has been very little assessment of the implementation and effectiveness of humanitarian accountability systems in Bangladesh. However, the influx of over 700,000 Rohingya refugees into Cox's Bazar from August 2017 has resulted in a strong focus on accountability and several associated studies looking to review accountability systems and processes within the Rohingya response. A Communicating with Communities working group was

¹² Zaman, H. (1996) Microcredit programmes: Who participates and to what extent?. BRAC-ICDDR, B Joint Research Project, Working Paper, (12)

¹³ Mir, M. and Bala, S.K. (2015) NGO accountability in Bangladesh: two contrasting cases. *VOLUNTAS: International Journal of Voluntary and Nonprofit Organizations*, 26(5), pp.1831-1851.

¹⁴ A national level coordination body for humanitarian preparedness and response, co-chaired by the government of Bangladesh and UN Resident Coordinator's office

¹⁵ http://www.nahab.net/knowledge_management/Accountability%20Framework%20in%20Localisation.pdf

set up relatively early in the response and an accountability sub-group was set up within this structure. An 'Accountability to Affected Populations (AAP) Manifesto' was developed to outline the group's vision and action plan towards accountability within the response. It outlines individual agencies' responsibilities and collective responsibilities as:

- Each humanitarian agency has a responsibility to ensure its programming is accountable to the communities it serves, and that the population has access to opportunities to raise concerns, make complaints, give feedback, and receive responses.
- Each humanitarian agency has a responsibility to refer, with complainant consent, complaints they receive that relate to other actors, and to receive from other actors the complaints relating to their operations.
- Additionally, in a response setting with many service providers, multi-sectoral mechanisms should be established in which community members can raise concerns and receive responses on an individual basis and/or through community representatives.

A study undertaken by Christian Aid and Gana Unnayan Kendra¹⁶ in February 2018 argued that current accountability systems in Cox's Bazar were largely ineffective: there was an overreliance on complaint boxes and phone lines that are the least preferred and least trusted mechanisms and are generally unused. The study also identified some accountability barriers: low levels of Rohingya literacy, language differences and cultural norms that restrict many women from public space were some of the main challenges for ensuring effective accountability mechanisms. The same study concluded:

- Complaint boxes are the least preferred, least trusted and most ineffective mechanisms.
- Phone/SMS hotlines are similarly non-preferred, not trusted and ineffective.
- The mahji system is preferred, used and trusted (but does have significant limitations). It also ranks highly because it is the primary known system.
- Voice recorders are preferred, well used and well trusted compared to other systems.
- Face-to-face with NGOs is one of women's more preferred and trusted accountability mechanisms.
- Face-to-face with government/military is one of men's more preferred and trusted accountability mechanisms.

A study undertaken by Internews¹⁷ in June 2018 found that 93% of the humanitarian agencies involved in the Rohingya response were collecting feedback from communities. However, the same study found that 59% of organisations that were collecting feedback did not have a structured mechanism to refer feedback that did not fall under their own remit, and only 23% of the organisations had formal processes in place to guide employees on how to handle feedback received from the communities.

A study carried out by BBC Media Action¹⁸ in July 2018 found that over a quarter (26%) of Rohingya people living in the camps had given feedback, and that the majority (82%) said they were either quite or very satisfied with what happened next. Men were more likely to have given feedback than women (27% compared with 15%), probably due to the restrictions placed on women's movement outside of the home.

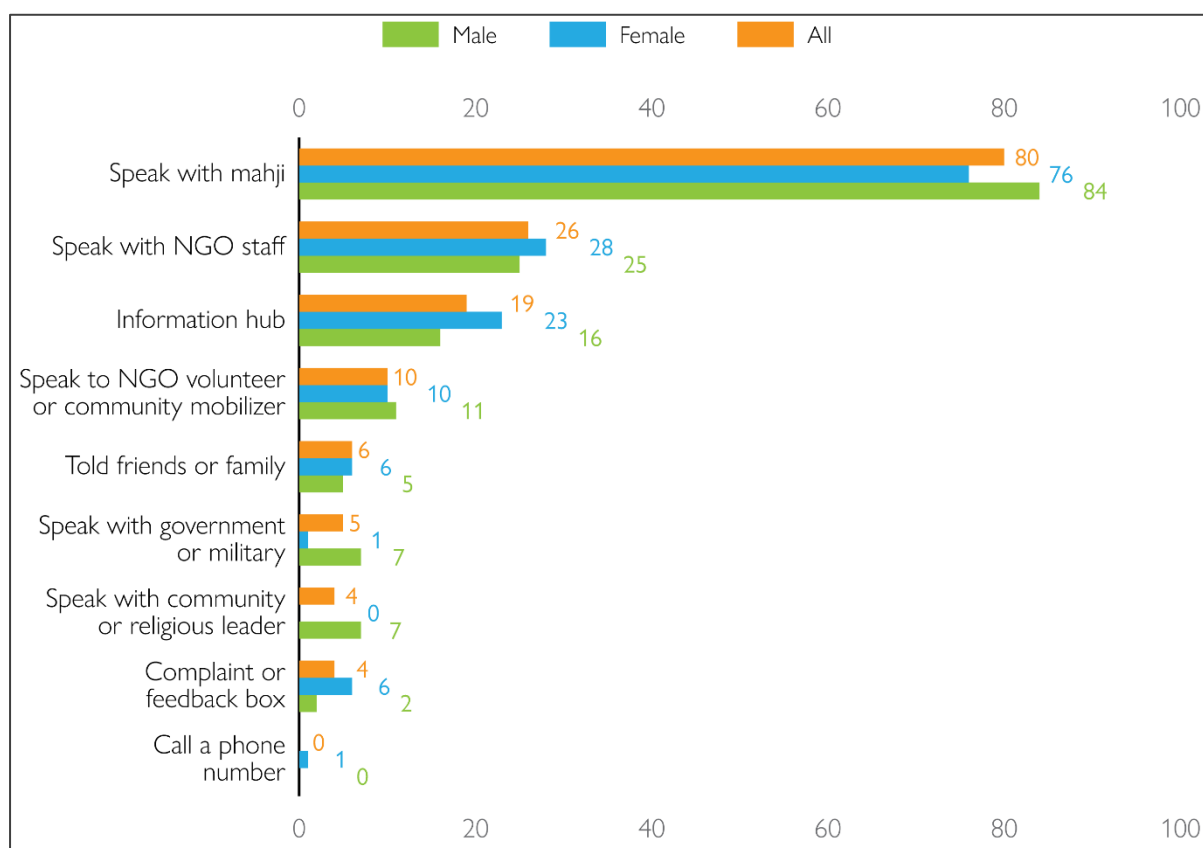
The study found that Rohingya people were giving feedback face to face, rather than using SMS, voice calls or complaints boxes (see figure below). This is likely to be because literacy levels are low, and people are not used to having the option to share their concerns anonymously, and, moreover, that it results in a more direct response.

¹⁶ Cristian Aid and Gana Unnayan Kendra (2018), Accountability Assessment Rohingya Response Bangladesh. Available from https://reliefweb.int/sites/reliefweb.int/files/resources/caid-guk_cyb_response_accountability_assessment_feb_2018.pdf

¹⁷ Albers, S., Fluck, V.L. and Rahman, J. (2018). Humanitarian feedback mechanisms in Rohingya response. Cox's Bazar. Available from <http://www.shongjog.org.bd/news/i/?id=79351f1f-96cf-4648-8ba9-f58e0a1520ac>

¹⁸ BBC Media Action, Internews, Translators without Borders (2018). CwC evaluation and information needs update. Available from <http://www.shongjog.org.bd/news/i/?id=51a5b51b-3861-4b04-8e4d-0acc65a37b82>

Figure: How feedback is given: Rohingya community



Base: Rohingya Community (n=750), Female (n=375), male (n=375).

Q. Have you or your family ever provided any feedback or complained about anything since you have been here? (if yes) How did you do it?

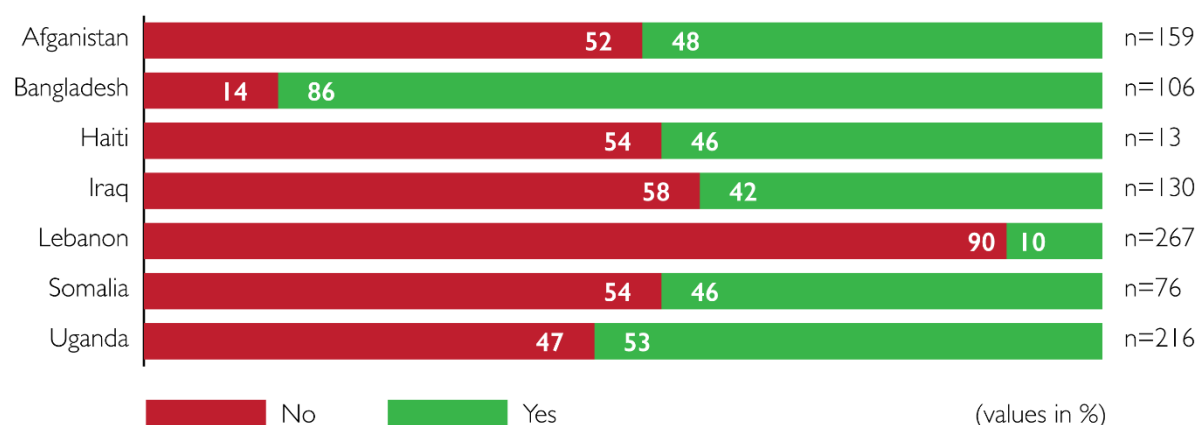
A community level study carried out by Internews¹⁹ in January 2019 found that 40% of Rohingya refugees still say they cannot talk to aid providers about their needs, ask them questions or tell them if they have complaints. This has reduced significantly from 62% in 2017, but challenges remain, particularly for women and older people, who are often less able to access feedback mechanisms due to restricted movement outside the home.

Analysis from Ground Truth Solutions (see table below)²⁰ suggests that the Rohingya response is unusual in terms of how satisfied affected communities are with how complaints are being dealt with. This may be as a result of the emphasis on accountability in the Rohingya response, and the resources being allocated to supporting collective efforts towards accountability. It could also be reflective of the communities' low expectations of having feedback and complaints dealt with in the past.

¹⁹ Abud, M., Al-Mahmood, S.Z., Rahman, R., and James, H. (2019). Information Needs Assessment 2019 Rohingya and Host Communities, Cox's Bazaar: Internews.

²⁰ Nick van Praag (2019) Blog: Time to act on what affected people tell us about humanitarian hotlines. <https://groundtruthsolutions.org/2019/05/06/time-to-act-on-what-affected-people-tell-us-about-humanitarian-hotlines/>

Affected people survey: Have you received a response to your suggestion or complaint?



Regarding information provision, 75% of the Rohingya community say that it has become easier to get information²¹ and between 72%²² and 92%²³ of refugees feel they have enough information to make good decisions for themselves and their families. While this represents a significant success for the response, some concerning information gaps remain. Ensuring equality of access to information throughout the response is one of the major identified gaps, particularly since women's access to services will be limited given the prevailing conservative views within communities, due to non-segregation or a limited number of female staffs²⁴. Marginalised people and those with limited mobility and literacy are heavily reliant on others for information and as such are at risk of denial, exploitation and other forms of abuse. Information provision is also not consistent geographically. For example, The proportion of households reporting having enough information to make good decisions ranges from 97% in camp 3 to 68% in neighbouring camp 1V²⁵.

Access to information also varies from topic to topic. For example, the importance of vaccination is well understood; but knowledge about the number and schedule of vaccinations for children is low²⁶. And while information about basic services appears to be getting through, only 41% of refugees say that they feel informed about their options for the future. Refugees cite topics such as finance, aid registration, events in Myanmar / Rakhine and long-term options for their and their children's futures as areas where they need more information. Language gaps are particularly challenging in these more

²¹ Bailey, N., Hoque, M., Michie, K. and Rabbi, F.U. (2018). How effective is communication in the Rohingya refugee response? BBC Media Action, Internews, Translators without Borders – Available from: <https://www.bbc.co.uk/mediaaction/publications-and-resources/research/reports/asia/bangladesh/rohingya-response>

²² Translators without Borders (2018). The language lesson: what we've learned about communicating with Rohingya refugees. Available from: <https://translatorswithoutborders.org/the-language-lesson-what-weve-learned-about-communicating-with-rohingya-refugees/>

²³ Information Needs Assessment: Cox's Bazar – Bangladesh. Internews. Available from: <https://internews.org/resource/information-needs-assessment-coxs-bazar-bangladesh>

²⁴ Rohingya refugee response gender analysis - joint agency research report. Available from: <https://reliefweb.int/sites/reliefweb.int/files/resources/rr-rohingya-refugee-response-gender-analysis-010818-en.pdf>

²⁵ Multi-sector needs assessment report - July 2018. Available from: <https://reliefweb.int/report/bangladesh/multi-sector-needs-assessment-report-rohingya-refugee-response-july-2018>

²⁶ Current level of knowledge, attitudes, practices, and behaviours (KAPB) of the Rohingya refugees and host community in Cox's Bazar. Available from: https://reliefweb.int/sites/reliefweb.int/files/resources/4_h_c4d_kapb_baseline_survey_full_report_final_ipa_oct_15_18_0.pdf

^a What contribution is the Common Service making to community engagement and accountability in the Rohingya response? Available from: <http://www.shongjog.org.bd/news/i/?id=0993b68f-be04-46dd-a76f-b0a54e60504b>

complex, socially sensitive areas – 36% of refugees struggle to understand a basic sentence in Chittagonian, so further progress in more complex topics must necessarily involve supporting aid providers to communicate clearly in spoken Rohingya, which is preferred by 98% of refugees.

In terms of humanitarian accountability, the Rohingya refugee response is unique for Bangladesh in many ways. The response is better resourced than smaller scale humanitarian responses tend to be, with a greater number of international actors bringing their own accountability frameworks and mechanisms with them.

The affected Rohingya community which the humanitarian agencies aim to support is also contained within camps, rather than within a community where local government processes already exist. Everyone living within the camps is in need of humanitarian assistance, which is not usually the case in local communities affected by crisis, where beneficiary selection is more challenging.

Examples on how agencies reflect beneficiaries' voice in their programming:

Practitioners found the humanitarian feedback bulletin *What Matters?* useful as it reinforces what they are hearing through their own feedback mechanisms, leading them to advocate within their own agencies to take action. An example noted by one agency is that hearing about communities' concerns about lack of cooking fuel through their own agencies' feedback mechanisms, and seeing these concerns also published in *What Matters?*, helped them advocate within their own organisation to start distributing LPG gas as a solution^a.

"We made a few changes because of the common service feedback. There are many issues in the What Matters? bulletin around fuel sources. We found this issue through our own feedback mechanism, but it was still useful to have it in writing elsewhere. That's why we started doing LPG programmes." - Humanitarian practitioner, top-mid level.

Practitioners gave examples of issues within the camps which had been resolved as a result of advocacy around key issues being raised by communities. For example, many of the camps now have street lights as a result of communities' feedback about feeling unsafe, and LPG gas is now being distributed as a result of ongoing feedback about the lack of cooking fuel.

Given the fact that several studies have already investigated the effectiveness of accountability systems in the Rohingya response, the primary research undertaken for this study aimed to investigate more about how accountability mechanisms are working in practice elsewhere in Bangladesh.

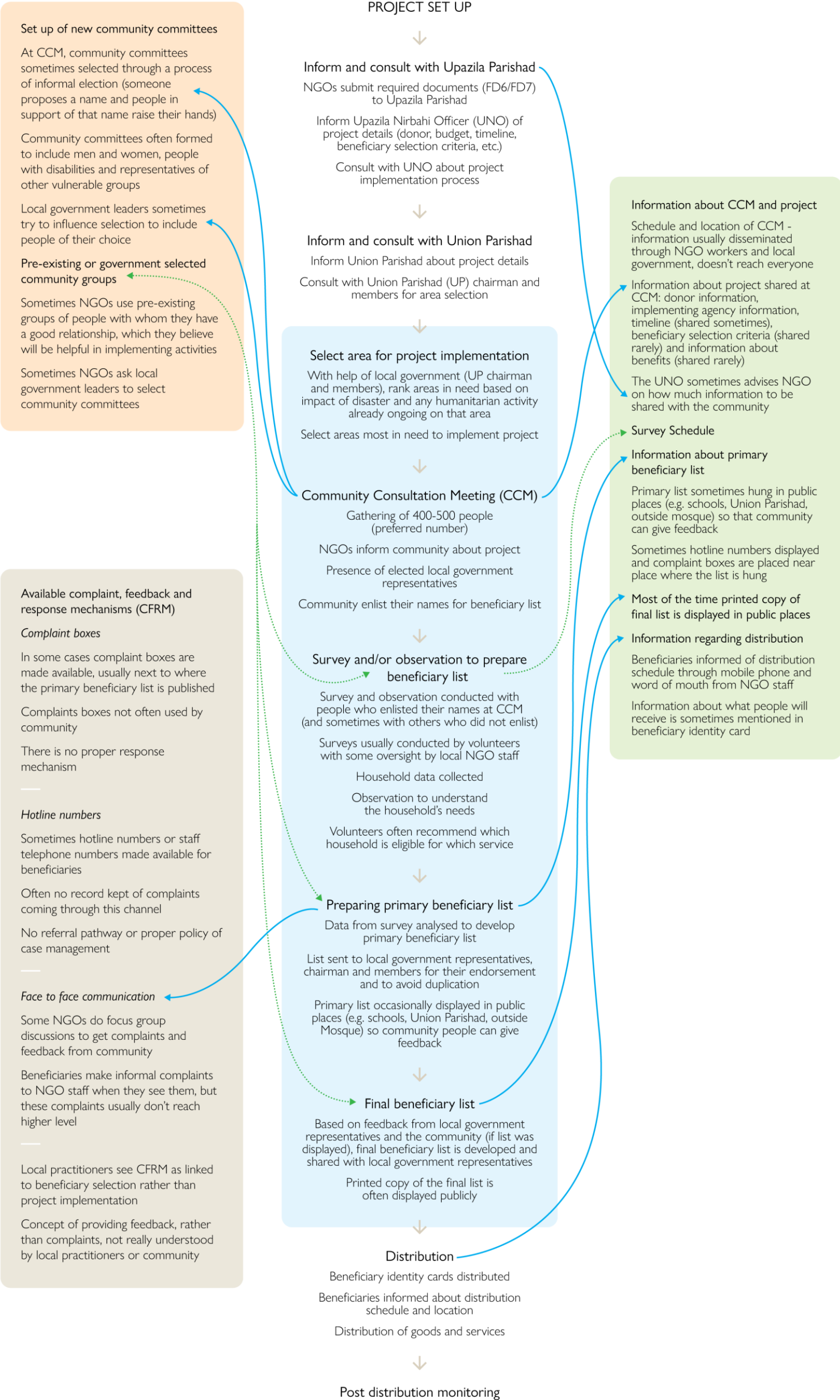
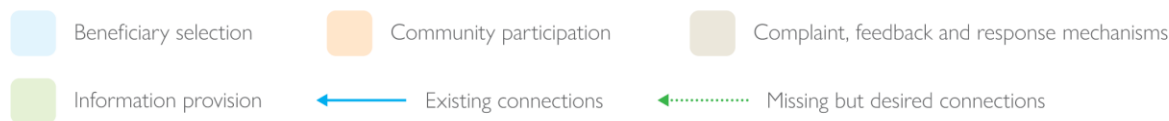
Primary research findings

Based on research with humanitarian practitioners and communities affected by crises in three areas in Bangladesh, the diagram below depicts how a typical humanitarian project is set up and implemented. It shows how agencies manage accountability to beneficiaries within the project cycle, focusing on four key aspects - beneficiary selection, information provision, community participation and feedback and complaints.

The following chapters of this report will look in depth at each of these aspects from the perspective of the humanitarian practitioners, and the experiences of affected communities. All the findings in the following chapters are based on the data collected from the field. It is important to mention that some participants (high level humanitarian practitioners) of the participatory discussion disagreed with some of the findings presented below.

The research looked into both regular and START fund projects and found the processes of these two types of projects to be quite similar, with a few exceptions. Those exceptions are highlighted in separate boxes in the following chapters. The research did not examine UN organisations as these do not directly implement humanitarian projects at field level and thus have no direct interaction with beneficiaries.

Accountability aspects of humanitarian projects in Bangladesh



The above diagram aims to display the overall scenario of the accountability mechanism in Bangladesh based on the data collected from three different locations of Bangladesh. All four segment of the above diagram, beneficiary selection, information provision, community participation and complaint, feedback and response mechanism will be elaborated in the chapters below.

1. Beneficiary selection

People will be affected by differently by crises, and in most cases, humanitarian assistance cannot be provided to every member of an affected community. Humanitarian agencies need to decide where the services and support they are providing are most needed and will be best used. As their resources are not infinite, they need to decide who will benefit from their services, based on a set of criteria which takes into account communities' and individuals' needs and capacities.

The HAP (Humanitarian Accountability Partnership) standard requires that organisations put in place processes which enable affected people to influence criteria for selecting target groups, and the selection process, and that this information will be shared with people it aims to assist and other stakeholders.²⁷

The diagram in the next page summarises the process of beneficiary selection which is usually carried out by different agencies.

²⁷ 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>

Beneficiary selection

Select area for project implementation

- » With help of local government (UP chairman and members), rank areas in need based on impact of disaster and any humanitarian activity already ongoing on that area
- » Select areas most in need to implement project

Community consultation meeting (CCM)

- » Gathering of community people (preferred number: 500 people at best)
- » NGOs inform community about project
- » Presence of elected local government representatives
- » Community enlist their names for beneficiary list

Survey and/or observation

- » Survey and observation conducted with people who enlisted their names at CCM (and sometimes with others who did not enlist)
- » Surveys usually conducted by volunteers with some oversight by local NGO staff
- » Household data collected
- » Observation to understand the household's needs
- » Volunteers often recommend which household is eligible for which service

Monitoring

Some NGOs conduct monitoring after data collection. Usually staff are involved in monitoring visits to verify names and houses after data collection

Analysis

- » Data from survey analysed to develop primary beneficiary list
- » This analysis is done by local NGO staff

- Local government want to influence NGOs to include preferred people in the list
- Demand money from listed people with threat of discarding their name if they do not agree to their demand
- Try to exercise power over NGOs to get preferred names enlisted

People local government wants to make to the list:

- » Relatives of chairman & member
- » Members of their political party
- » People who have the ability to give money

Primary list (first draft)

- » NGOs share the primary list (first draft) with local government (chairman & member)

Very rarely NGOs hang the primary list in public places, exp: Union Parishad office, in front of school, mosque and local market along with complaint box (to receive public feedback)

Feedback on primary list from the local government and public (if displayed)

- » Feedback addressed to produce the final list

Endorsement of final list

- » Feedback incorporated final list is endorsed by UP chairman and displayed publicly

Distribution

- » Beneficiary identity cards distributed
- » Beneficiaries informed about distribution schedule and location
- » Distribution of goods and services

Key findings – beneficiary selection

International NGOs usually rely on local partners to implement programmes. International NGOs work through local NGOs who implement their projects, including managing beneficiary selection. A few international NGOs require their local partners to conduct monitoring²⁸ of the survey of the beneficiary selection process, but this is not a practice amongst all NGOs.

Community consultations tend to be about making a beneficiary list rather than understanding communities' needs and priorities. Community consultation meetings (CCM) are held once the NGO has selected, along with the UP chairman, which wards the project will be supporting. The NGOs inform and invite the members and chairman to the CCM. Although these meetings are meant to be about understanding the community's needs and priorities, in reality they tend to be community members putting their name on a list to be potential beneficiaries. Practitioners interviewed mentioned that NGOs provide project related information to the people in community consultation meetings, but the most important activity of the CCM is to form community groups or committees and creating the list of potential beneficiaries.

"In community consultation meeting we give people information about our project and form project implementation committee (...) then we collect names of people who want to get support and we conduct our survey based on that list."

Practitioner, Local NGO

Findings of this study suggest that community consultation meetings do not take place for START Fund projects. According to practitioners, given the very short nature of the START Fund projects, CCMs cannot be accommodated. It was found that the potential beneficiary list is drafted informally, by talking to people from the affected community while in other cases NGOs directly go for a community level survey.

The informal discussion with the affected community took place in an urban setting and there is a possibility that the informal discussion was possible because the affected area was quite small.

The beneficiary selection process is to some extent dependent on recommendations from survey data collectors, who are in most cases local volunteers. Surveys, to collect household information and observe a household's situation, are usually carried out by volunteers who are paid on a daily basis. They have been trained in data collection, but don't necessarily have experience in humanitarian response. Based on criteria provided by the NGO, the volunteers decide who is eligible for the NGO's service, to make up the primary list of beneficiaries. Some organisations conduct monitoring visits to check data quality, but usually only if this is required by the international NGO. Community members fear that, if a volunteer doesn't like them, they will not be included on the beneficiary list. Volunteers usually come from the local area and may choose to select people they know. Some community members also mentioned that local leaders and powerful people have influence over the local volunteers which sometimes results in the selection of people preferred by those with power and influence.

"He or she [the volunteer conducting the survey] may be close to someone personally. That close person could request to include him or her in the beneficiaries list, maybe in exchange for something. In this way, some innocent people drop out from the list".

Male community member

²⁸ A second team, generally formed of NGO staff, goes to the location where the first team, generally formed of volunteers, has already finished their survey. The second team randomly selects some of the households surveyed by the first team to check the quality of data

Despite reassurances from some NGOs, community members give a share of their relief goods to the local government for fear of being taken off the beneficiary list. According to government regulations, the primary list must be endorsed by the local government. Because of that obligation, NGOs share the primary list with the local government to get their feedback. Following receipt of the list, some assistants of the UP chairman and members ask people to give them a share of their relief goods or cash if they want to stay on the list. Although some NGOs communicate to community members that their entitlement to relief does not depend on them making payments to anyone else, people prefer to provide a share of their relief in order to ensure they are included in lists for future responses. Community members do not know which NGOs they can trust, as some are more influenced by local government than others – for example, some do not conduct their own surveys and just ask local government to provide a beneficiary list.

“There is difference from NGO to NGO. Some NGOs prepare their own list properly while some come to me and ask me to prepare the list on their behalf. And some mis-selection takes place there. (...) If you give me the responsibility, we will do some unfair selection. We try to include people from our party. If you give us that responsibility, we will do it, no surprise. (...) And that kind of selection does not cause any problem because when 90 per cent of the beneficiaries are poor people, you can ignore the other 10 percent.”

Local government member (Union Parishad)

“I thought I would get 2000 BDT, but if I give you 500 BDT it doesn't matter because at least I am getting 1500 BDT. I have no work and if I get 1500 that would be enough for me. Also, if I give that 500 BDT to that specific person then, next time, when another NGO will start giving money to the people, my chance of getting more money will be high.”

Male beneficiary

Members of the local government try to influence the NGOs to include their preferred people in the list. As the NGOs have an obligation to get the beneficiary list endorsed by the local government, the chairmen and the members have a bargaining chip in their hand. Some chairmen and members try to use that to include people of their choice in that list.

“I am a three terms member here. In my first term, the then chairman had some issues with an NGO. He wanted some names to be included in the list of beneficiaries, but the NGO did not comply with his demand and, because of that, the NGO relocated the project from here. ... With other NGOs, there was an understanding with the chairman. He would get some of his own people listed as beneficiaries and then he would sign [the list].”

Local government member (Union Parishad)

According to the practitioners who worked in an urban setting, the challenge of dealing with the local government was not a big issue as they had to only deal with the local ward counsellor, who in this particular case was very cooperative.

There is a possibility that the process of dealing with local government is more challenging in a rural setting because NGOs need to deal with the UP chairman along with a number of members from every ward in the target union.

NGOs vary in what and how they communicate about beneficiary selection to affected communities. A few NGOs post the primary beneficiary list in public, with a complaint box or a telephone number for people to complain if they want to, although this is not common practice amongst all organisations. NGOs who do publish the primary list have found that this makes it harder for local government to remove names from the list, since people can easily identify who from the primary list has been left out and who has been added later in the process.

Most organisations publish the final beneficiary list. Along with that, beneficiary identity cards are distributed.

Community people have lots of complaints about duplication. NGOs depend on the local government or Union Parishad to avoid duplication. Community people claimed that people who have good connections with the leaders, or could give money to them, have a higher chance of being included in the final beneficiary list, since the chairman has the authority to identify if someone is getting support from multiple sources.

“Those who receive aid once keep receiving it; and those who have not received any aid will never have it.”

Female community member

2. Information provision

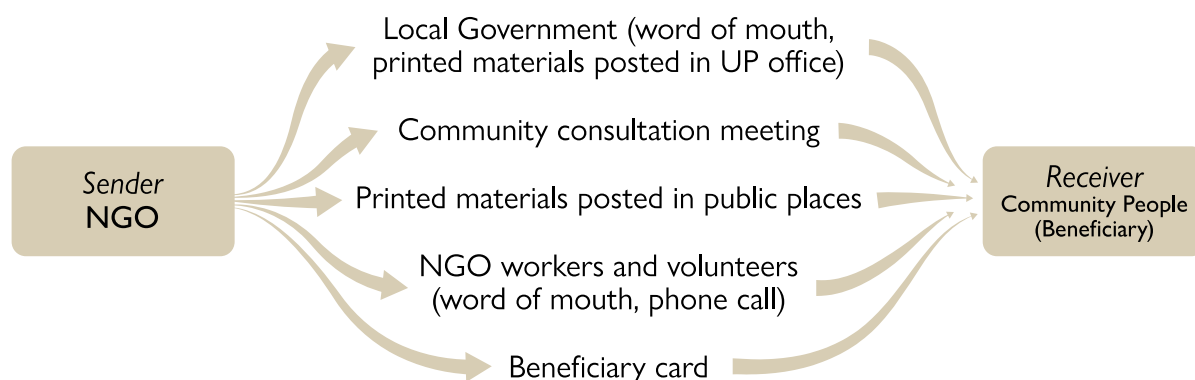
The fourth commitment in the Core Humanitarian Standard (CHS) is that ‘communities and people affected by crisis know their rights and entitlements, have access to information and participate in decisions that affect them.’ The first key action under this commitment is to ‘provide information to communities 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 about what an organisation intends to deliver, and how, is important as it theoretically enables community members to hold that organisation to account if they are not delivering on their commitments.

Practitioners participating in this survey felt their agencies were providing relevant information to communities. However, as the diagram below shows, there can be a disconnect between information which an agency feels it has communicated, and information which community members feel they have received.

Information communicated with the community people	Mentioned by		Channel/s used for communication
	Practitioners	Community people/Beneficiary	
Information on donor	✓	✗	Community consultation meeting (CCM), beneficiary card
Duration of the project	✓	✗	CCM
Beneficiary selection criteria	✓ (few)	✗	CCM, word-of-mouth
Distribution time and place	✓	✓	word-of-mouth, phone call
Primary beneficiary list	✓ (few)	✓ (very few)	Printed materials
Final beneficiary list	✓	✓	Printed materials, word-of-mouth
Receivables (services, Goods)	✓	✓	Beneficiary card, word-of-mouth
Conditions of conditional money	✓	✓	word-of-mouth
Survey time	✓	✓ (few)	N/A
When CCM will be held	✓	✓ (few)	word-of-mouth
NGO Identity	✓	✓	CCM, word-of-mouth
How to complaint and feedback	✓	✓ (very few)	Beneficiary card, word-of-mouth
Information about rights and benefits of giving complaints and feedback	✗	✗	N/A
Assurance about confidentiality of giving complaints and feedback	✗	✗	N/A
Reasons of not being selected	✗	✗	N/A

The below diagram illustrates the channels used by NGOs to share information:



Key findings – information provision

NGOs communicate with community members via local authorities and their own staff and volunteers. Main channels of communication used were word of mouth (staff, volunteers, peer to peer), printed materials and the community consultation. Practitioners feel the absence of effective IEC materials, which would help them to explain how and when to access support.

Community members did not receive all the information practitioners said their agencies communicated. Community members received distribution information and knew who the local organisation was, but not the names of international organisations. But the community did not receive beneficiary selection criteria, the primary beneficiary list, when the CCM was scheduled to take place, the duration of the project, and how to make a complaint or provide feedback. Lack of information about the community consultation is an important gap, since the meeting itself is an important source of information, but many community members did not know when it was scheduled to take place.

Communities sometimes only knew what type of relief they would receive once they reached the distribution point. NGOs decided to provide this information as late as possible to avoid everyone trying to get listed or any kind of chaos.

According to practitioners from urban settings, communicating detailed information about the types and amount of relief is challenging because of the densely populated nature of the urban areas. People who are not affected but live near the affected area randomly try to be included on the beneficiary list. There is also a risk of these people crowding in to the relief distribution point and creating chaos.

Community people complained that they do not get information about the schedule of the beneficiary selection survey and therefore lose the opportunity of being included in the beneficiary list, since they are not at home when the survey is conducted. Some also said that they did not get any information on beneficiary selection criteria, though the practitioners of local NGOs argued that information on beneficiary selection criteria is communicated to the people.

“NGOs do not inform us on what basis beneficiaries are selected. They send some people to villages who prepare a list and with consultation with the members the final beneficiaries are selected.”

Male beneficiary

Community people mentioned that they do not get to know the reason for not being selected in the beneficiary list. Some argued that, despite being in a more vulnerable situation than the selected people they were deprived and there were no answer or clarification. Those who are selected get to know about their entitlements from the beneficiary card.

"I am as poor as he is, but he made it to the list, and I did not. And I never got to know the reason behind me not being selected in the beneficiary list."

Male community member

Rights and entitlements of giving complaints and feedback, and confidentiality of giving complaints and feedback, is not communicated with the community properly. People do not understand that giving complaints and feedback is their right and are not aware of the benefits of giving complaints and feedback. NGOs do not give them that information. Even local NGO staff do not have well developed understanding about the rights and entitlements and confidentiality of giving complaints and feedback.

NGOs have organisational and political challenges in sharing information. Practitioners mentioned that lack of capacity amongst their staff is a problem that prevents them from sharing information and that budget limitations restrict organisations from recruiting the number of staffs they feel they need. Political challenges are also preventing NGOs from sharing information about services or goods with the community. For example, in an urban context it is not possible for an NGO to share service-related information to the community without consultation with the counsellor of the ward of the city corporation, because of crowd management.

"The number and quality of staff is an issue. Say we have four staff for a project, but they cannot deliver the desired output. Also, you cannot hire more staff because there are bindings from the donor's end."

Practitioner, INGO

Getting the message across: can humanitarian accountability learn lessons from other sectors?

Given the gaps in effective information provision seen in this primary research, it is useful to look at lessons from other sectors to see whether communication approaches used elsewhere could helpfully inform humanitarian communication.

Social marketing²⁹ interventions use a mixture of approaches which aim to motivate people to change while also addressing barriers that prevent that change. This combination of channels and activities is an important aspect to the approach – it is rare that a social marketing initiative would use only a single channel. Social marketing is heavily based on consumer research and often uses this to segment target audiences based on demographic characteristics and, critically, aspects of their lives, personalities and attitudes that are linked to the desired behavioural outcome – with marketing activities tailored to these segments. A deep understanding of the consumer group is key to success; as is consideration of the psychological and practical barriers that prevent consumers from adopting desired behaviours; and the use of well-evidenced, theoretical frameworks to help translate consumer and behavioural insights into high-quality communication activities³⁰.

Similar critical success factors can be seen when looking at private-sector actors' marketing approaches to more vulnerable and disaster-prone communities. The 'last mile' marketing presence

²⁹ "The application of commercial marketing technologies to the analysis, planning, execution and evaluation of programs designed to influence the voluntary behaviour of target audiences in order to improve their personal welfare and that of society." (Andreasen, A. (1995), *Marketing Social Change: changing behavior to promote health, social development, and the environment*, Jossey-Bass, San Francisco)

³⁰ Stead, Martine; Gordon, Ross; Angus, Kathryn and McDermott, Laura (2007). *A systematic review of social marketing effectiveness*. Health Education, 107(2) pp. 126–191.

of these industries – particularly fast-moving consumer goods such as beverages and toiletries; and mobile phone services – is strong and ubiquitous, largely due to their in-depth understanding of these consumers. This, in turn, is driven by investment in ground presence, through representatives with strong local knowledge, and local partnerships, particularly with retailers and small entrepreneurs with strong local market understanding³¹. Focusing on customer loyalty and long-term engagement, rather than simply aiming for sales, has also been shown to be key to success³². Focusing research, marketing and relationship-building activities on women is important in marketing to poorer communities because their household management role means that they can be key to new products being accepted, and because of their strong social capital³³.

Drawing on both social and private-sector marketing lessons, the humanitarian community may therefore want to ensure that post-disaster communication initiatives are based on strong and nuanced audience understanding and well-evidenced and tested communication approaches. Long-term relationship building with vulnerable communities, in advance of a disaster, could also lead to stronger communication impact if and when an emergency occurs.

3. Participation

Participation of affected communities is critical to ensure humanitarian assistance projects are meeting the priority needs of the people they aim to support. The fourth requirement for meeting the HAP Standard is that ‘the organisation listens to the people it aims to assist, incorporating their views and analysis in programme decisions.’ According to the HAP guidance, this involves developing processes to 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 echoes this, suggesting the following key action: ‘ensure representation is inclusive, involving the participation and engagement of communities and people affected by crisis at all stages of the work.’

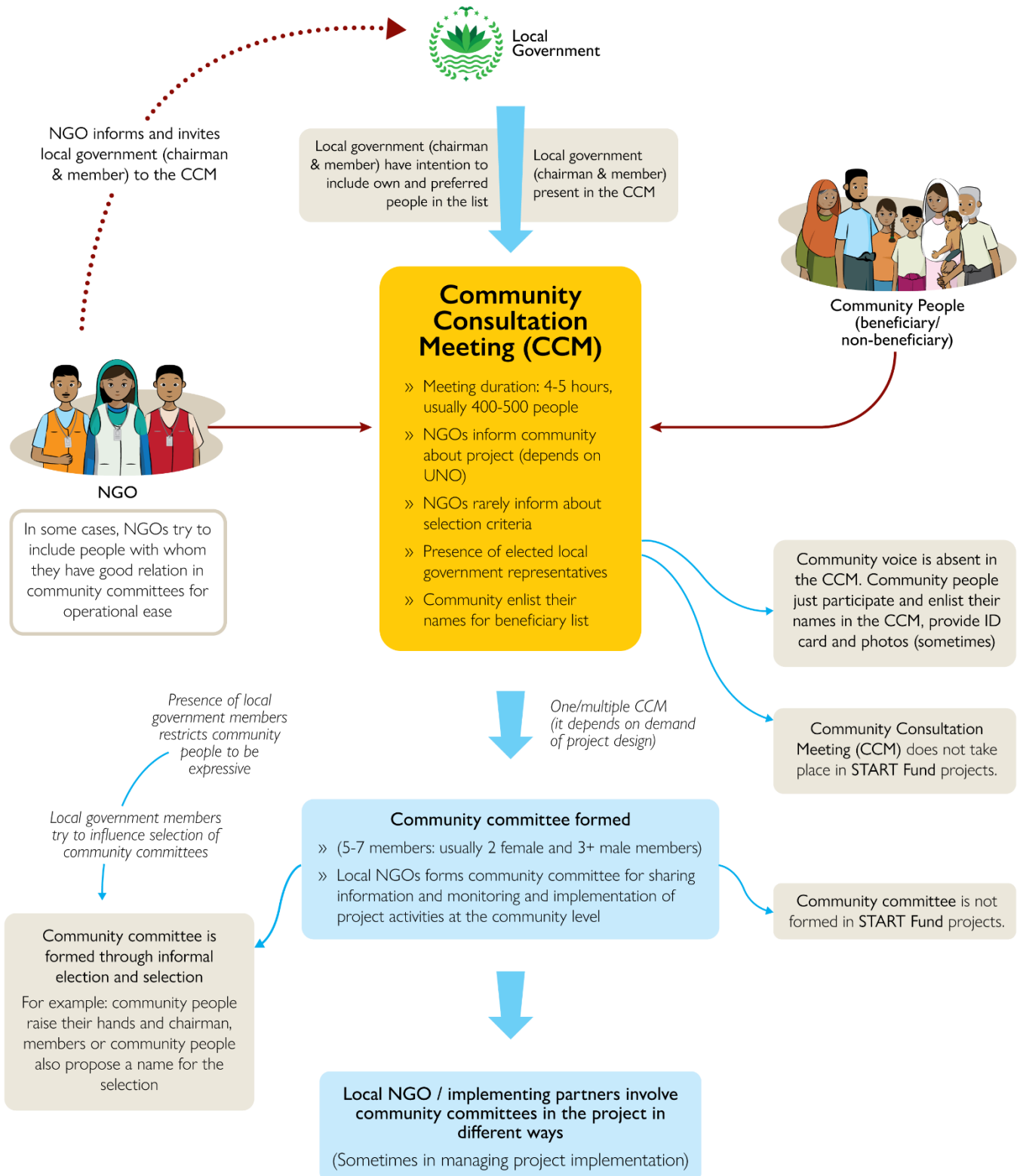
For the agencies involved in this study, a CCM (community consultation meeting) is usually the first interaction with the community, to which community members and the local government are invited. These meetings are usually the first time the community hears about the project; and where people put their name down as potential beneficiaries. They are also usually where community committees are formed to oversee the project from the community perspective. Different agencies have different names for these committees, depending on the role they will play in the project, but they are designed to ensure community involvement throughout the project. They are usually designed to be representative of the community, with quotas for female and male participants, older people and people with disabilities.

³¹ Christian Seelos and Johanna Mair (2007). *Profitable Business Models and Market Creation in the Context of Deep Poverty: A Strategic View*. Academy of Management Perspectives, 21(4)

³² S M Asif Ur Rahman, Muhammad Rehan Masoom (2012). *Effects of Relationship Marketing on Customer Retention and Competitive Advantage: A Case Study on Grameen Phone Ltd*. Asian Business Review, 1(1)

³³ C K Prahalad and Allen Hammond (2002). *Serving the world's poor, profitably*. Harvard Business Review, R0209C

Participation



Key findings - participation

Community consultation meetings (CCM) are often not widely known about, making them less inclusive and meaning people miss out on important project information. Many community members said they heard about community consultation meetings by chance, or they hadn't heard about them at all. Practitioners admitted that it would be difficult to manage meetings if the whole community participated, therefore they are not advertised as widely as they could be. This may lead to only privileged people who are close to local government officials receiving communication about the meetings, which leaves others at a disadvantage as they are not able to put themselves on the potential beneficiary list or be selected for community committees.

"We want the community consultation meetings to have four to five hundred people, otherwise with more people it gets chaotic and the purpose of the meeting cannot be attained."

Practitioner, local NGO

There is no standard practice when it comes to number of CCMs in respect to population size. Practitioners mentioned that the number of CCMs depend on the desires of the INGOs or the donors.

"Sometimes we arrange one community consultation meeting for the whole project catchment area, sometimes we even organise community consultation meetings for every ward we work on. This depends how the project is designed by the donor or our partner organisation."

Practitioner, local NGO,

Community voice is absent in the community consultation meeting. While the community consultation meeting is supposed to help with understanding community needs and priorities, community members rarely get an opportunity to speak about their needs and priorities in the meeting. Community people just enlist their name in the potential beneficiary list, show their ID card and provide their photo, while the NGOs give information about the project.

Selection processes for community committees vary and can be subject to influence by local government. Different NGOs have different selection processes for community committees – some are elected by the community themselves, others are suggested by local government representatives. Some NGOs select people who have influence over community members so that they can help get things done. Community members and practitioners felt that local government members try to influence the formation of these bodies so they can have more control over the whole process.

Community committee members do not understand their rights and entitlements and are therefore vulnerable to being used as project implementers under the guise of participation. Members of one community committee explained they were not consulted on community needs, or plans or decisions, but were tasked with managing a cash for work project – keeping track of attendance and ensuring everyone was working properly. Community members did not feel that agencies understood their needs or priorities, and distributed relief goods they could not use. These examples suggest that community committees exist but sometimes do not lead to participation or community needs being met. Also, there is usually no provision for orientation, induction or training for the community committee members so that they can understand their roles and responsibilities.

"Say, more than 100 people were digging soil, we managed from where to dig soil, coordinated the work to make the roads. We basically managed the work done by those people. ... We were five in the committee and by rotation we used to maintain the register of when people came to work and when they left. We took care so that the job was done properly."

Male community committee member

"In the meeting, our committee was formed, and we were given the responsibility to manage the work. Except for that, we were not told about any other responsibility and we did nothing other than managing the people involved in the road making."

Female community committee member

"They [community committee members] helped us managing the work and taking attendance from the workers who were working to build the roads. On that project we had 24 schemes and there were only four employees who had to work in two upazilas and five unions. It was not possible for us to reach everywhere, so that we asked the committee to help."

Practitioner, local NGO,

One NGO in the field study did provide training for members of the community committee, so that they could better represent their community and negotiate with the local government and local administration. Through the training, members of the community committee were made aware of their rights and informed about available services so that they could assist people better.

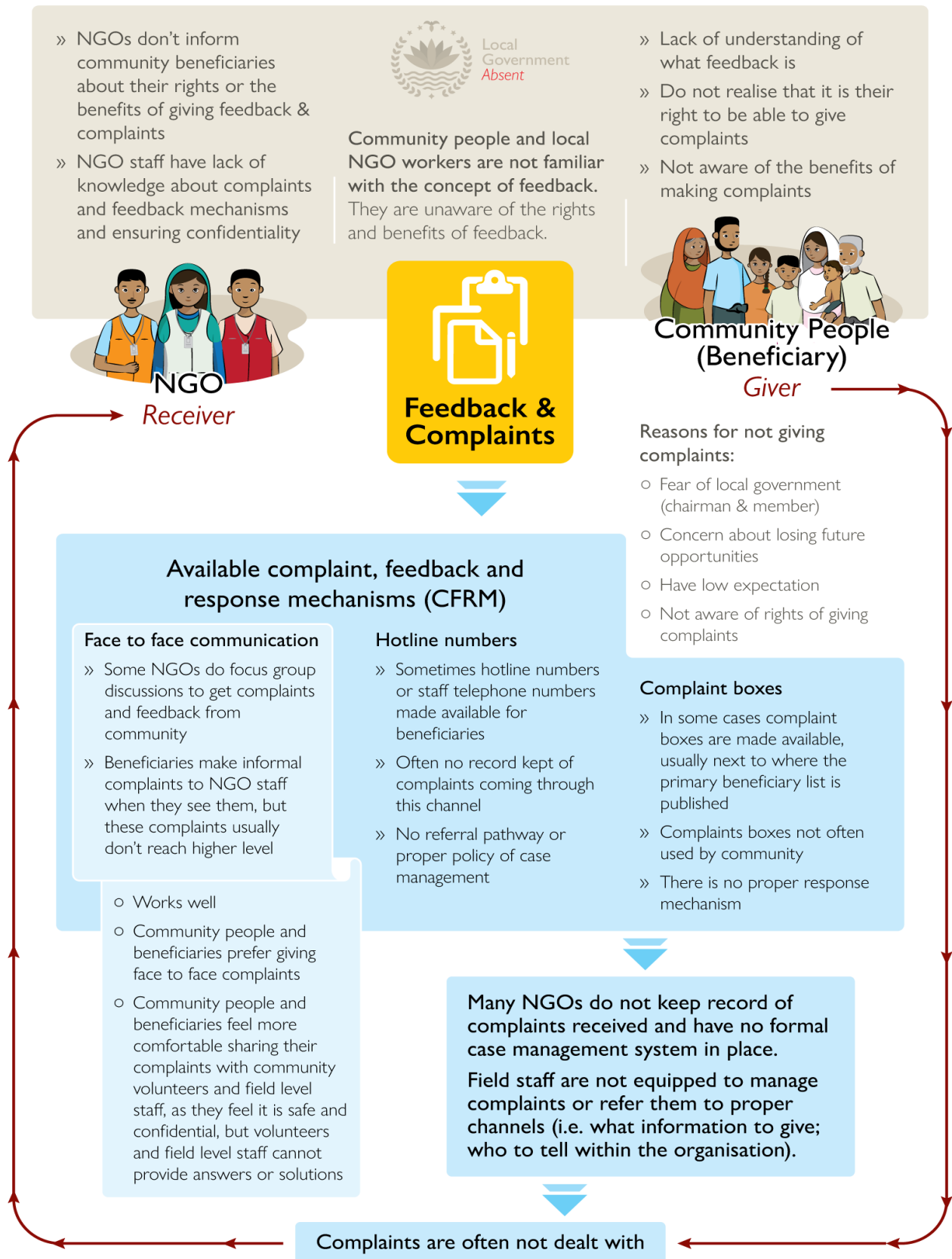
4. Feedback and complaints

In order to be accountable to the communities they aim to support, humanitarian agencies need to have feedback and complaints mechanisms in place which affected people feel safe and confident to use.

The fifth CHS³⁴ quality criteria is 'complaints are welcomed and addressed', and recommends that 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.

³⁴ <https://corehumanitarianstandard.org/files/files/Core%20Humanitarian%20Standard%20-%20English.pdf>

Complaint, feedback and response mechanisms (CFRM)



Key findings – feedback and complaints

Community members prefer to provide complaints face to face. This clear preference was expressed by communities during primary research, and is in line with findings from the Rohingya response and other studies internationally.

Although communities are most comfortable with face to face interactions, field level volunteers and staff mostly weren't able to provide answers to their questions. Community members explained that agency representatives they approach with complaints often don't know the answers, and they do not seem to have a process in place to find out the information or feed these complaints back to people higher up in their organisation.

"Sometimes we try to complain to the NGO staff about not receiving any kind of aid and other problems, but they tell us they cannot do anything about it and we need to reach a higher authority for this."

Female community member

Face-to-face feedback in practice

Despite the general lack of use of face-to-face channels for collecting and dealing with community feedback, there are a few notable exceptions.

One NGO is using a 'demand register'. Since community volunteers are trusted by the community and are a preferred channel of communication, community volunteers move around in the village with a register in their hand and collect complaints and feedback. They note these down in their register, which is later reviewed by NGO staff or the community committee, depending on the nature of the complaint or feedback. This 'demand register' is popular with the community and a relatively high number of complaints and feedback are received through this channel.

Another NGO uses the community committee to collect complaints and feedback. The committee sends the details to the NGO office, so they can take action. According to a practitioner from that NGO, this initiative is working very effectively.

There are local NGOs who do not have any complaint mechanism in place while some do not respond to complaints. In some cases, NGO workers said that a complaint mechanism was in place, but people in that community said they did not know about it.

"An NGO has been working in our area for the last two years but there is no way we can reach to them and inform them about our concerns and problems. There is no option of giving a complaint. If we reach out to any staff from that NGO, they say they are not the assigned person to talk to."

Male community member

"My brother's name was in the beneficiary list, but he did not get any relief or goods. He made a complaint. But there was no response to that complaint. No one from the NGO replied or took any action."

Male community member

"Initially I was told that I will get support to rebuild my house. But getting my card, they said I will get only some cash. I complained about it in the office and within a few days my issue was solved."

Male beneficiary

"The last time we received rice, it weighted 86kg while we were supposed to receive a 90kg sack. We wanted to complain about this matter but did not know how to do that."

Male beneficiary

Community people and local NGO workers are not familiar with the concept of feedback. They are unaware of the rights and benefits of feedback.

Some community members contact agencies by phone, but complaints boxes are rarely used. Community members preferred to have direct contact with agency staff, so they could get an immediate response. Practitioners said they received a lot of phone calls from community members, but some agencies were better equipped than others to deal with complaints over the phone. While a few local organisations had a dedicated person to record and escalate complaints, others were not keeping records and did not have a case handling process in place.

There are four main reasons why community members said they don't use complaints mechanisms:

- **Fear of harassment or being removed from current or future beneficiary lists.** This is why people do not complain about being asked for a share of their relief by local government officials.
- **Complaints mechanisms are not perceived to be functional or reliable.** Community members said they make complaints, but never receive a response from agencies. Practitioners explained they often receive fake complaints, or complaints about beneficiary selection which they don't respond to.
- **Complaint mechanisms are not perceived to be trustworthy.** People fear that the identity of the person making the complaint will not stay secret, which could cause problems for them, like harassment or missing out on future opportunities. Also, the local NGOs do not advertise about the confidentiality of the process to the people or assure them. In most cases, complaint boxes are placed inside the Union Parishad office and people do not feel comfortable going there to make a complaint.
- **People don't understand their rights and entitlements or how complaints mechanisms should work.** Community members in this study had low expectations and were generally happy with what they received. This may be exacerbated by the fact that most NGOs did not communicate widely about how complaints would be dealt with, including confidentiality and entitlements.
-

"We are poor. We have no right to get this assistance from NGOs but still they give us support. If they give us less in quantity, still they are giving us something and we are benefited from that. So, it would be ungrateful if we complain against the people who are helping us."

Female beneficiary

"From 90kg rice if we need to give away 20kg then there is nothing to complain about, because I am still getting something. And also, there is fear of getting beaten up if I complain."

Male beneficiary

"Though there is a complaint box and hotline, we do not complain because we fear the chairman and members. The complaint system needs to be secret, but we are not sure if our complaints will be secret or not."

Male beneficiary

Case study – why people do not complain

Aslam (pseudonym) is a 32-year-old Bangladeshi national who lives in a village near the Rohingya camps in Cox's Bazar district. He is a day labourer and is significantly affected by the Rohingya crisis as the market has been flooded by Rohingya labourers who are available for a lower wage than him.

In December 2018, an NGO started operations in Aslam's village to support people in the community who were affected by the Rohingya crisis. Aslam enlisted his name to get support and was eventually selected as a beneficiary to receive 20,000 taka in cash. But one of the other villagers, Hasan (pseudonym), who is an acquaintance of the local UP chairman, approached him and said that he needed to give 5,000 taka to the UP chairman, out of the 20,000 he was about to receive from the NGO.

People from the NGO reached out to Aslam and told him that they had decided to give him his money through a bank account, in order to ensure that he could get the money securely so that he didn't have to share it with anyone. They helped him fill in a bank account application form and collected the necessary documents. People from the NGO told him to inform them if he faced any problem, so they could help.

A few days later, one of the NGO's staff phoned Aslam to say that the money had been deposited in his account and he could withdraw it whenever he wanted. When Aslam went to the bank, there was an NGO officer there who helped him to withdraw the money and reminded him that he did not need to give anyone a share of his money. They said that, if anyone asked him for a share or if he felt threatened in any way, he should inform the NGO and his security will be ensured.

Coming back home with the money from the bank, Aslam separated 5,000 taka to take it to Hasan's house and give it to him. Aslam felt that, if he did not give the money to the chairman's people, they would be angry and they might take revenge and cause him harm. He was worried that the NGO would only be in the area for a few days and would leave as soon as their project ended, but he would have to stay in the village for the rest of his life. Even if the NGO could protect him for the time being, there would be no-one to save him from the chairman and his men after the NGO had gone. Aslam also knew that this would not be the last NGO to come to his village and that, if he did not share his money this time, the chairman would make sure that his name was not enlisted in future. According to Aslam, giving up 5,000 taka now would probably get him another three rounds of 15,000 taka – and that's a better deal than keeping the full 20,000 this time.

Conclusions and recommendations

Findings from the field sites studied suggest that, generally, accountability mechanisms outside of the Cox's Bazar refugee response are not currently delivering the levels of effective beneficiary accountability that international standards and best practice guidance strives to achieve. Work being carried out in Cox's Bazar appears to be adhering somewhat more closely to the desired standards – although gaps are still apparent. Looking at some of the more operational international standards highlighted earlier in the report, the gaps found – both through primary research undertaken for this study and reports reviewed connected with the Rohingya response – are readily apparent.

Best practice	CXB Rohingya	CXB host and non-CXB
HAP Standard benchmarks		
The organisation sets out the commitments that it will be held accountable for, and how they will be delivered	Lack of understanding within the refugee community about what standards they should expect from humanitarian actors.	Information about rights, entitlements and humanitarian standards is not generally communicated to affected people.
The organisation ensures that staff have competencies that enable them to meet the organisation's commitments	Fair to good capacity, but competency gaps remain, particularly at field level.	Often very little awareness or understanding, particularly amongst local NGO staff. High reliance on volunteers who do not receive sufficient sensitisation on accountability topics.
The organisation ensures that the people it aims to assist, and other stakeholders have access to timely, relevant and clear information about the organisation and its activities.	Access to information amongst refugees has increased dramatically since the start of the response; but gaps remain, particularly within marginalised groups.	Intention to communicate clear information to beneficiaries and communities is often undermined by the use of less effective channels and communication methods, given the context.
The organisation listens to the people it aims to assist, incorporating their views and analysis in programme decisions.	Some evidence that programme decisions are beginning to be influenced by community views and feedback.	Engagement of communities in programme design is sporadic and, in some programmes, symbolic. Little evidence of programme adaptation in response to community feedback.
The organisation enables the people it aims to assist and other stakeholders to raise complaints and receive a response through an effective, accessible and safe process.	Range of complaint mechanisms that appear to be effective, for those who use them. Lack of awareness of and access to mechanisms – particularly for women – is a problem.	Inconsistent standards mean that complaint mechanisms are unpredictable. Systems that do exist are often not understood or not trusted by the community.
The organisation learns from experience to continually improve its performance.	Several assessments of accountability systems' effectiveness, and evidence that agencies have acted to address gaps. Specialist and peer support available through the	Very little evidence that the performance of accountability systems and processes is reviewed.

Best practice	CXB Rohingya	CXB host and non-CXB
	accountability working group and common service.	
ALNAP elements for effective feedback mechanisms		
Trust in the feedback mechanism and the organisation that runs it	Generally, very high levels of trust in aid providers amongst refugees.	Local organisations often enjoy a high degree of trust within the community; but beneficiaries can be suspicious of government involvement in feedback mechanisms and are worried that their identity may be disclosed if they raise complaints.
Location of the feedback mechanism within the organisation, as a part of broader processes rather than stand-alone components	Various models, depending on the agency, but mostly integrated with broader community engagement activities and/or monitoring and evaluation teams.	Feedback mechanisms often bolted on to the responsibilities of delivery staff; resulting in a lack of independence.
The existence of dedicated resources to support the feedback mechanism	Dedicated staff and resources within many agencies. Response-wide technical support available.	Usually very limited resources, with feedback mechanisms operating as poor relations to distribution activities.
Designed flexibly and adaptably, in line with community preferences	Data collection systems tend to be well designed and consider community preferences. Case management and response systems are less robust, particularly if feedback requires referral beyond the agency receiving it.	Mechanisms generally based on complaints boxes and hotlines, despite community's preference for face-to-face engagement. Field staff are not empowered to receive or respond to feedback and often do not have systems to make referrals.
Assessing whether the mechanism is working and adapting it as the context, programmes and services being delivered change	Several assessments of accountability systems' effectiveness, and evidence that agencies have acted to address gaps. Specialist and peer support available through the accountability working group and common service.	Very little evidence that the performance of accountability systems and processes is reviewed.

The gaps identified above are, in general, not due to a lack of commitment or ambition – indeed, there is strong evidence of humanitarian actors' desire to achieve strong, effective accountability and the importance of the topic is well reflected in organisational, cross-agency and national strategies. Rather, there are gaps in operationalising these commitments, which are in large part due to a mismatch between the policies and processes that humanitarian agencies have put in place and the ground reality of implementing those processes at field level. This key finding is reinforced by the fact that a number of Dhaka-level practitioners questioned some of the findings from field research during a participatory workshop held to validate the primary research findings (see below). Recent global research by Ground Truth Solutions³⁵ also reinforces this theme, which concluded that 'Feedback mechanisms are less effective than humanitarian staff think'.

³⁵ Ground Truth Solutions, *Grand Bargain: field perspectives 2018*. <http://groundtruthsolutions.org/our-work/tracking-the-grand-bargain-from-a-field-perspective/>

Main areas where Dhaka-level practitioners questioned the findings from the field³⁶:

Some organisations say that they do not use volunteers for beneficiary selection, but instead use staff from the national implementing partner. Volunteers assist in these cases, but are not allowed to carry out the selection alone and do not make recommendations about beneficiaries.

Most organisations' Dhaka-level practitioners maintained that the number of participants in a community consultation was normally 50-70 people, not the 400-500 people described by field practitioners.

Organisations said that community consultation is not organised through local government, as was described in the field. The local government is included as a stakeholder or observer, and KIs are done with local government, but most community consultations happen independently from local government.

Several organisations insisted that the initial beneficiary list was always displayed publicly and that they used community feedback to finalise the list.

A few organisations refuted that local committees were influenced by government officials; saying that those committees were strong, well organised and very rarely biased.

The findings from this study indicate that this disconnect between organisational policy and process and field-level reality is happening for a number of reasons:

Low capacity of local NGOs in terms of managing accountability mechanisms

Lack of understanding of how feedback mechanisms should work

Many local NGOs don't have their own accountability mechanisms in place and try to follow what is requested by them of the international NGOs who fund their work. This sometimes results in local NGOs trying to operationalise different feedback mechanisms at the same time, which results in confusion and lack of clarity at field level. A stronger understanding of the importance and necessity of effective feedback mechanisms could help local NGOs to develop their own, resource appropriate mechanisms which they could use consistently.

"They (donors) make those feedback and complaints mechanism with the help of a consultant and give it to us, whether it matches our community or not, whether it matches our office culture or not. They just train us and go."

Management level local NGO practitioner

A similar gap can be seen in the Rohingya response, where local staff and volunteers working in camps often have a much lower level of understanding about how feedback mechanisms should work compared with mid-level staff and managers. Efforts are being made to address these gaps, and good progress is apparent, although gaps still exist.

Lack of resources and dedicated support / management buy in

Effective humanitarian feedback mechanisms require resources which local NGOs may not have. Dedicated staff responsible for receiving, recording and ensuring cases are followed up are important for an effective feedback mechanism. Staff also need to feel safe and confident to share feedback and raise community issues within the organisation, and with the international NGO / donor if necessary. How well field level staff and volunteers are informed and connected with the wider organisation is critical for accountability and effective community engagement. Outside of the Rohingya response,

³⁶ These rebuttals are included for interest and information, and to demonstrate the differences between perceptions of effectiveness as Dhaka and field level. The study has not attempted to ascertain whether the field level findings or the Dhaka level assertions are 'correct'.

where feedback mechanisms are generally relatively well resourced, there is a general lack of resources to operate effective feedback mechanisms.

Inappropriate mechanisms being used

Communities' preference for face-to-face communication was understood relatively quickly in the Rohingya response, with most communication and feedback opportunities now taking place through non-written means. Outside of Cox's Bazar, feedback boxes – which are not preferred by communities – are still prevalent. Moving to communities' preferred channels requires investment and support of local staff, who need to be equipped with answers to communities' questions and have a clear understanding of a process they feel confident to explain and use to escalate feedback.

Communities not understanding their rights and entitlements or how feedback mechanisms should work

Communities generally had low expectations for how feedback and complaints would be dealt with and did not trust or feel comfortable providing feedback in case they were denied relief in the future. Lack of community demand for, and understanding of how feedback mechanisms work, including clearly articulated principles around confidentiality and transparency, is a barrier to feedback mechanisms working effectively. A lack of awareness and understanding of feedback mechanisms amongst communities, coupled with access barriers for some demographic groups, is also a problem within the Rohingya response – even though those who have used a system are mostly satisfied with the outcome.

The wider governance context

NGOs are operating within a challenging context of corruption and lack of effective local governance. Local channels of accountability already exist, however ineffective or corrupt they may be. With their feedback mechanisms, NGOs are often trying to set parallel systems, to ensure their beneficiaries are able to hold them to account. However, these mechanisms are usually temporary, and not well understood, compared with the systems people have lived with their whole lives. If people have little trust in existing local governance systems, can they be expected to trust a new system, no matter what assurances they are given by NGOs, who they may not have heard of before? This issue is compounded by the fact that different NGOs involve local government to a greater or lesser extent in beneficiary selection and participation processes, making it difficult for communities to know who to trust.

Drawing from a Transparency International report³⁷ and joint work from Transparency International and the U4 Anti-Corruption Resource Centre³⁸, some of the strategies below could be effective in dealing with corruption-related challenges in humanitarian settings:

Address corruption risks as part of disaster risk reduction strategies

Build corruption risk analysis into emergency preparedness. Analyse the local political economy – power structures and 'gatekeepers' – in areas where emergencies are chronic or repeated, so you can select appropriate partners or local intermediaries.

Liaise with other agencies and pre-plan a joint stance against external sources of corruption

Discussion of corruption needs to be brought more into the open, with a clear emphasis that addressing it is not the same as condoning it or implying an agency's particular vulnerability to it.

³⁷ Preventing Corruption in Humanitarian operations (2014). Available from:

https://www.transparency.org/whatwedo/publication/preventing_corruption_in_humanitarian_operations

³⁸ Shipley, T., Managing corruption challenges in humanitarian settings (2019). U4 Available from:

https://knowledgehub.transparency.org/assets/uploads/helpdesk/Managing-corruption-challenges-in-humanitarian-settings-2019_PR.pdf

Agencies should share their policies and practices and where possible align them to put up a united front against local political influence. By pre-planning joint policies and practices against external corruption sources as part of emergency preparedness, agencies can put up a united front that thwarts corruption attempts. If all agencies consistently resist pressure for corruption, the incentive for government officials, militias or private business to apply that pressure fades.

Promote two-way transparency in government-agency relations

Encourage governments to speak out publicly on the conduct of relief operations, and to listen and allow agencies and donors to speak out as well, without the fear of being thrown out. Promote open dialogue and debate over the best way of implementing emergency relief and avoiding corruption in a particular context. Commit to high standards of behaviour and zero tolerance of corruption and invite the host government to do the same.

Nurture ongoing media relations

Don't engage with the media just as a public relations device to promote your organisation, but openly encourage their scrutiny, treating them as partners in delivering accountability to beneficiaries. Where staff security won't be threatened, give journalists access to emergencies and exposure to their complexity, so they don't press for an unduly hurried response. Hire a media expert to liaise with journalists and build trusting, honest relations.

Recommendations

- 1. Support humanitarian organisations to strengthen their own accountability mechanisms, including understanding the concepts of accountability; ensuring that the right tools, systems and skills are available within their organisations; and providing access to sufficient resources to support their accountability efforts.**

This could be achieved through:

- a. Providing training designed to improve the level of knowledge around accountability standards and expectations, focused on practitioners (staff and volunteers) working at field level, especially those who work in local NGOs ("what?")
 - b. Training and mentoring at field and management level to support the effective, practical implementation of accountability systems and processes within a response ("how?")
 - c. Agreeing a minimum standard for accountability practice³⁹ for humanitarian responses in Bangladesh, with an associated self-assessment tool which organisations can use to identify their current gaps in practice against this standard.
 - d. Developing an 'off the shelf' set of accountability tools⁴⁰ to meet the minimum standard described above, with associated training and mentoring support, that can be adopted by any organisation who does not currently operate comprehensive accountability systems.
-
- 2. Enhance the role of local volunteers and local community groups in delivering an accountable humanitarian response, recognising that affected populations are enthusiastic about face-to-face communication channels involving members of their own community, and the value that effective involvement of community groups in planning and delivering a response can bring. Doing so will not only help**

³⁹ This could be adapted from standards that already exist – for example the NAHAB benchmarks (http://www.nahab.net/knowledge_management/Accountability%20Framework%20in%20Localisation.pdf) or the work undertaken by Shongjog to inform the recent SOD revisions.

⁴⁰ Again, there would be no need to start from scratch. Shongjog has already created and collated a number of tools; and there are many more internationally that could be adapted and translated. See, for example, the CDAC 'how to' guide: <http://www.cdacnetwork.org/tools-and-resources/i/20190205105256-aoi9j>

to ensure that the true concerns and feelings of affected people are central to the design and delivery of a response; but can also help humanitarian agencies to overcome issues of interference that are often experienced within local power structures.

This could be achieved through:

- a. Developing and adopting a systematic method of selecting representatives for community / advisory groups (this method to go beyond asking for volunteers in community consultation meetings).
- b. Agreeing guidelines that define the minimum number of community consultation meetings that need to be held for a particular scale of disaster and the way that those meetings should operate. These meetings should be accessible, well advertised and professionally facilitated.
- c. Developing a best-practice guideline and associated training and mentoring for operating face-to-face information services in a response.
- d. Ensuring that community groups established within a response are sufficiently inducted and supported to play their role in representing their community. This includes ensuring that there is clarity about the mandate of these groups and formal agreement of their role in the beneficiary selection process; and may require establishing separate community groups for different elements within a particular response project.
- e. Investing in long-standing community groups to allow them to take on an advisory role if and when a response is active in their local area.

3. Support humanitarian actors to communicate more effectively with communities around principles guiding humanitarian action, what they can expect from their organisation, and how they can expect complaints and feedback to be dealt with.

This could be achieved through:

- a. Agreeing common guidelines for what information should be shared with communities in a response, when it should be shared, and which mediums should be used (bearing in mind community preferences).
- b. Using alternative communication channels to improve the effectiveness of communication about topics which communities are most concerned about, but which are currently not being clearly communicated within responses. Particular attention should be paid to:
 - schedule and process of community consultation meetings
 - schedule of beneficiary identification surveys
 - information about the existence, operation and confidentiality of complaints and feedback systems
- c. Commissioning a set of common, unbranded communication tools that can be used by all agencies in any response – for example on aid being free, humanitarian principles.
- d. Scoping the role of a separate communication and feedback function for small, medium and large disasters in Bangladesh, meaning that this function would be straightforward to commission in a response situation. It would be independent of any relief operation and would provide expert, systematised and dedicated communication and feedback resources to the response. This could include, for example, setting up inter-agency information centres; arranging for common collection; analysis of feedback; and/or provision of common communication tools.

4. Improve consistency in data collection and introduce mechanisms that help humanitarian actors make more data-driven decisions.

This could be achieved through:

- a. Developing and agreeing standard data collection tools for beneficiary surveys⁴¹. This tool should help ensure that beneficiary selection processes are fair and equitable; and could also help to provide richer data on local needs and concerns, beyond the level of granularity currently provided by higher-level common tools such as the JNA.
- b. Providing training and mentoring for volunteers and field workers to ensure that data collection is consistent and efficient
- c. Introducing a system of back-checking to improve the quality of data generated by beneficiary surveys
- d. Increasing coordination among local NGOs to avoid duplication, beyond the level of coordination already undertaken by local government

5. Increase the predictability and consistency of community feedback and response mechanisms (CRFM), thus increasing the level of trust that beneficiaries place in these systems and providing humanitarian actors with better data about community concerns to make programme decisions.

This could be achieved through:

- a. Agreeing minimum standards for the processes of how feedback is collected, recorded, dealt with and escalated, using the Cox's Bazar Accountability Manifesto as a starting point. These standards include a minimum common data model that all agencies would use in their CFRM, to facilitate easier sharing and joint analysis of feedback data.
- b. Developing and agreeing SOPs and related tools and systems for an inter-agency, face-to-face information centre model, allowing such a centre to be rapidly deployed into any particular response.
- c. Developing an 'off the shelf' community feedback and response system, designed based on communities' own preferences for feedback channels and including complaint logging, case management and documentation / data processing. This system could be used (or adapted) by agencies with no system currently in place, in order to meet minimum standards.
- d. Developing a pre-agreed set of referral pathways and ensuring all field-level staff are aware of these systems, allowing humanitarian actors to quickly refer issues that require resolution by others.
- e. Agreeing data sharing protocols (including any legal agreements and safeguards required in light of data protection legislation) and identifying mechanisms that can incentivise transparency and data sharing across a response.

6. Bring humanitarian actors together to advocate for particular policy-level enablers that will enhance accountability practice.

Specific policy-level engagements are suggested to be:

- a. Ensuring that sufficient human resource for accountability is provided for in humanitarian project budgets. Engagements are needed with humanitarian delivery organisations (to

⁴¹ Note that this is not the same as the work undertaken through joint needs assessments in advance of a response – these would be tools to ensure that household-level data collection in advance of beneficiary lists being created was standardised. Tools could draw on experience from the Philippines: <http://www.cdacnetwork.org/tools-and-resources/i/20180501101020-ob6hp>

- ensure they sufficiently budget for it); donors (to ensure these costs are considered eligible) and government (to provide space for these costs within FD7 approval processes)
- b. Addressing issues of interference – particularly with beneficiary selection processes. This will require positive engagement with both Local Government Division and other statutory actors; and with local UP members, sensitising them about key humanitarian concepts and standards, so that they understand their role and responsibilities in the provision of humanitarian aid.
 - c. Private sector, media and other non-traditional humanitarian stakeholders, who all have a role to play in ensuring accountability but are not yet substantially engaged with or aware of the importance of the topic.

Epilogue: Towards a national accountability approach

One of the objectives of this study was to ‘provide recommendations for designing a National Accountability Mechanism’. To do so is more complex than it first appears since, drawing on the findings from this study and experience in Bangladesh and elsewhere, the practicality and usefulness of a truly national mechanism, when weighed against the time and effort that would be necessary to create one, is questionable. While the moves towards closer collaboration around accountability that have been found are clear, and the commitment from SHPR, HCTT and key actors within the current response in Cox’s Bazar to prioritise more joined-up accountability practice is to be welcomed, this study does not recommend the development of a single, standardised system, either for community feedback and complaints or more widely. This conclusion is drawn for a number of reasons:

- Many agencies already have their own systems in place and will wish to continue using them. Experience in Cox’s Bazar clearly shows a lack of appetite amongst international actors to abandon their own, globally sanctioned processes in favour of a standardised system within a particular context. And findings from the primary research undertaken for this study very clearly show that local and national NGOs do not want to have an external system imposed on them, but would rather establish their own mechanisms – with guidance – designed in keeping with their particular local context and their local community’s preferences.
- There are significant barriers to combined databases. These include legal issues, particularly for organisations whose operations are governed under more stringent data protection legislation of their HQ country, and organisational nervousness about how complaints data may be used by other actors.
- The varied range of contexts that exist in humanitarian response in Bangladesh mean that agreeing and operating a single system would not be practical or sensible. The type of accountability mechanism that is appropriate for a small, government-led response is not the same as would be sensibly used for the type of large-scale, international humanitarian action that would be required after a substantial cyclone or earthquake. To expect a national mechanism to be applicable in this large range of scenarios would result in the mechanism being too complex and lacking practicality.

There are, though, concrete steps that can be taken to better harmonise accountability practice across the country; to reduce or remove duplication; and to improve the quality and predictability of accountability services available to affected communities. While a national accountability mechanism is not an aspiration that we recommend, with the right leadership, it is perfectly possible for Bangladesh to move towards a national accountability *approach*, underpinned by a range of different mechanisms and processes operated by different agencies and authorities at different levels.

The journey towards this common approach will require implementation of many of the recommendations listed above. The most important next steps for national-level actors, referencing the more detailed recommendations from the section above, are shown here along with suggestions about the roles that different bodies can play in taking these forward.

Key workstream	Linked recommendations	Potential lead body
A nationally agreed set of minimum standards , based on international and Bangladesh-specific evidence, to set a clear expectation for all humanitarian actors about the accountability practice that is expected of them.	1c, 3a, 5a	HCTT
Practical tools and off-the-shelf templates that help actors to benchmark their existing practice against the nationally agreed standard; and adapt or introduce new systems and processes to help them meet the standard.	1d, 2c, 3c, 5c	SHPR
Training and mentoring support , at both field and management level, focused on (a) improving understanding of accountability standards and expectations (linked to the national minimum standards); and (b) enabling effective, practical design and implementation of agency-specific systems and processes that meet the national standards.	1a, 1b, 4b	SHPR
Standardised data models and sharing protocols that simplify the collation and analysis of data collected by different actors and provide a legal basis for agencies to share agreed levels of data between them.	4a, 5d, 5e	HCTT

Annex I – summary of primary research methods

Method of data collection	Participants	Location		Quantity	Number of participants
In-depth interview	Practitioners	Cox's Bazar		3	3
		Kurigram		4	4
		Dhaka		2	2
In-depth interview*	Elected local government member of Union Parishad	Kurigram		1	1
Pair depth interview*	Project implementation committee member	Kurigram	Female	1	1
			Male		1
Focus group discussion	Community people	Cox's Bazar	Female	1	7
			Male	1	7
		Kurigram	Female	1	10
			Male	1	7
In-depth interview	Beneficiaries	Cox's Bazar	Female	2	2
			Male	2	2
		Kurigram	Female	2	2
			Male	2	2
		Dhaka	Female	2	2
			Male	2	2
Community Consultation	Community people	Cox's Bazar	Female	1	7
			Male	1	10
		Kurigram	Female	1	16
			Male		5
Total:				30	93