

# HPG Background Paper

## Donor accountability in the UK

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## 1. Introduction

This paper outlines the formal and informal processes and mechanisms through which the UK government, and specifically the Department for International Development (DFID), accounts for and is held accountable for its international emergency humanitarian relief policies and programmes. As in all policy areas, different and overlapping forms of accountability apply at a variety of levels of policy-making, resource allocation, programming and service delivery. The discussion therefore starts by mapping out the main types of accountability: (1) political/strategic accountability at the macro policy level; (2) legal accountability; (3) managerial accountability; (4) financial accountability; and (5) contractual accountability for service delivery.

The paper also discusses supplementary accountability mechanisms, including the informal (largely domestic) scrutiny and influence exerted on DFID and the UK parliament by the media, NGOs and academia, and the new or evolving international accountability mechanisms created by DFID's relationships with other stakeholders in the international humanitarian aid system, including other donors, UN agencies and Red Cross organisations and beneficiaries and institutions in the recipient countries.

The UK parliament is the ultimate institution for holding the executive and its departments to account. It is here that the laws and policies formulated by the executive are debated and enacted, and it is here that the accountability of the government to the UK public is formally disbursed. This paper outlines the primary mechanisms through which parliament holds the UK government and its departments to account, and discusses some of the key limitations on the effectiveness of these mechanisms. The paper goes on to examine how the government's and DFID's core responsibilities are articulated in the area of humanitarian assistance, how DFID accounts for its policies and activities in this area and how it is scrutinised by other actors, including parliament. To conclude, the paper focuses on the most significant gaps and weaknesses in the complex web of accountability processes and relationships associated with DFID's emergency aid programme.

## 2. Accountability in the UK public sector: types, drivers and processes

The ministerial model of accountability is the core constitutional basis of parliamentary scrutiny in the UK: ministers are answerable to parliament for their conduct of public policy and administration. Departmental officials are, in turn, accountable to the departmental minister.

A number of fundamental debates surround current interpretations and application of the doctrine of ministerial responsibility. These centre on where and how the line should be drawn between ministerial responsibility (understood in terms of potential blame or credit) and ministerial accountability (interpreted in terms of declaratory explanation and clarification). Should a minister be required

not only to provide an account of particular policies or activities, but also to take full responsibility – and therefore potentially blame – for the activities of his or her civil servants?

As more public service provision is contracted out, the distinctions between responsibility and accountability, and between policy (for which politicians are accountable), management (for which civil servants are accountable) and operations (for which service delivery managers are accountable) have become critical. The distinctions between different forms of accountability have also become increasingly marked as different levels of public services and delegated agencies have taken on more distinct functions. Because the public sector cannot work to straightforward profit and profitability criteria, attempts to introduce greater accountability for the efficient and effective deployment of public resources have required the introduction of new systems of monitoring, assessing and reporting performance and outputs at all levels. These include new systems for assessing management and measuring performance (Glynn and Murphy, 1996). Five main types of accountability operate at different levels, each of which is associated with a distinct set of accounting mechanisms.<sup>1</sup>

### 2.1 Political/strategic accountability (external accountability)

In the UK system of ministerial responsibility, political or 'strategic' accountability relates principally to members of the executive charged with defining and carrying out policy. These ministers are obliged to explain their policies and actions to the electorate and take responsibility for them. The executive/ministers therefore maintain responsibility for macro-policy objectives and overall resource allocation.

Accountability at this level depends on a clear definition of strategic policy objectives. Statements of objectives and targets are contained in government White Papers (overarching statements of government policy and objectives in particular areas) and, since 1999, Public Service Agreements (PSAs) agreed between government departments and the Treasury. PSAs are short statements of a department's priority objectives for the next three years, with associated performance measures and targets. They are reviewed every two years as part of the government's spending review process, and departmental budgets are linked increasingly to performance in relation to the PSAs. In addition, each department reports on its performance against PSA targets in its annual reports to parliament. Where responsibility for service delivery is devolved or contracted out to agencies, the executive takes responsibility for *enabling* the provision of services, rather than for providing services directly.

Parliamentary scrutiny is the principal means of formal accountability at this level. Ministers should report on their policies to the House of Commons (for example, through annual departmental reports and memoranda to select committees), and should be held to account for these policies through MPs' Parliamentary Questions (PQs), select committee inquiries and parliamentary debates.

Informal accountability mechanisms – the media, special interest and lobby groups, NGOs and academia – also play a significant role in holding ministers and their departments to account at the strategic policy level. These informal mechanisms interact with the formal accountability processes operating through parliament, as well as with each other. Increasingly, for instance, ministers and senior civil servants try to account directly for their policies and actions through statements to the media, in addition to (and sometimes in advance of) statements to parliament (Norton, 2000). Meanwhile, much of the scrutiny of government policy undertaken by parliament is supported and/or influenced by the flows of information, analysis and advice provided by these other actors.

## 2.2 Legal accountability

Ministers and their civil servants are also accountable to UK and European courts of law for their policies and actions. Public authorities must act within the law, and the exercise of powers by public authorities is always open to challenge in the UK courts by way of judicial review. There are three grounds for judicial review: illegality (the executive did not have the power to act), irregularity (the executive failed to follow proper procedures) and irrationality (the executive's decision-making was insufficiently thorough). The courts can only assess whether the decision or action of a public authority was lawful; they cannot replace an unlawful decision with a lawful one.

Since any individual, organisation or company in the UK may petition for judicial review in the courts, the legal channel provides an important route outside of parliament through which members of the public may try to hold ministers and civil servants to account for particular actions or decisions. In the 1995 'Pergau Dam' case, for instance, a British NGO successfully challenged the Foreign Secretary's decision to fund a dam in Malaysia on the grounds that it was in breach of the Overseas Development and Cooperation Act of 1980. In this case, judicial review proved a more effective check on government than parliament, since successive select committees had criticised the government over this issue, but had not succeeded in influencing its decision.

Judicial review is only possible where government policy and action is circumscribed by relevant and sufficiently clear legislation. Legislation is enacted and amended by parliament. If legislation in a particular policy area is especially weak or unclear, the accountability of the executive and government departments to the courts will be weak. Any gaps in legislation, and thus in the government's legal accountability, can only be addressed through parliament.

## 2.3 Managerial accountability (internal and external)

Government departments are charged with implementing the government's macro-policy objectives, subject to allocated resources. Civil servants are accountable to the

senior civil service and to the minister concerned for achieving targets and objectives for the allocation of resources, including negotiating and managing contracts with service providers.

Managerial accountability of civil servants is based increasingly on results-based management, reflected at the macro level in the PSAs. Each department's PSA is supported by a Service Delivery Agreement (SDA), which is focused on the implementation of policy. The SDA explains how the department will contribute towards delivery of the PSA targets. While civil servants are accountable to their minister for the implementation of policy, ultimate responsibility traditionally rests with the executive. DFID's current SDA, for instance, opens with a clear statement that the Secretary of State for International Development is responsible for its delivery by the department. However, there is debate in the UK about whether civil servants and agency chief executives should become more directly responsible and accountable to parliament for the implementation of policy where responsibility for operational matters has been devolved to them, leaving ministers accountable and responsible for policy. This reflects growing pressure for a clearer separation of political/strategic and managerial accountability. Mechanisms of managerial accountability include:

- internal reporting to senior civil servants and the minister (for example, to the departmental management board and through annual departmental resource allocation rounds);
- external reporting by the department to the Treasury and parliament on the PSAs and SDAs;
- monitoring and evaluation of managerial performance at various levels (internal and external);
- parliamentary scrutiny of policy implementation by select committees; and
- 'value for money' (VFM) audits by the National Audit Office (NAO) and parliamentary scrutiny by the Public Accounts Committee (PAC).

Although the NAO and PAC are concerned primarily with financial scrutiny, reporting on VFM criteria requires attention to how programmes are being implemented, and therefore attention to managerial and policy issues. There is therefore considerable overlap between government departments' managerial and financial accountability. All government departments are required to include a VFM indicator in their PSAs.

Informal assessment, review and evaluation activities supplement these formal reporting and accounting mechanisms at all levels within government departments. These tend to be oriented towards lesson learning and improving effectiveness, rather than towards accounting internally or externally for particular policies or actions.

## 2.4 Financial accountability (internal and external)

The financial accountability of government departments is separate from managerial accountability, with distinct

accounting mechanisms. Yet because financial accountability is concerned with the regularity, effectiveness and efficiency with which public resources are used and managed, it overlaps with managerial accountability. Mechanisms of financial accountability include:

- internal reporting to senior civil servants;
- external reporting by the department to the Treasury and parliament through departmental annual reports (linked to the process of seeking funds and authority from parliament for annual expenditure plans), and audited accounts for the Comptroller and Auditor-General;
- internal audit systems; and
- external financial and VFM audits by the NAO and parliamentary scrutiny by the PAC.

## 2.5 Contractual accountability for service delivery

Government departments increasingly delegate or sub-contract the delivery of public services to agencies and/or independent organisations, including voluntary sector organisations. These agencies and organisations are responsible and accountable for providing services to clients in accordance with contractual terms agreed with the department concerned.

The principal mechanisms of accountability at this level are reporting, monitoring and evaluation of individual projects and programmes, and monitoring and evaluation of individual service providers. Performance monitoring and reporting typically depend on self-assessment by the service providers and their project managers. Contracts therefore usually include an obligation for agencies to monitor their performance and report back to the government department concerned. These reporting and monitoring requirements usually focus on project- or programme-level inputs, activities undertaken and outputs and impacts. While much of the monitoring and reporting activity at this level will be biased towards quantitative indicators, government departments may also conduct or commission qualitative evaluations.

## 3. Parliamentary scrutiny

In the Westminster system of parliamentary government and ministerial responsibility, the executive is drawn from the legislature and is constitutionally responsible to it. Parliament not only enacts legislation, but also ensures that the executive answers to parliament for its conduct of public policy and administration. This is to ensure that the measures, policies, actions and spending of government (ministers and their departments, and associated agencies) are subject to effective scrutiny on behalf of its citizens, and to ensure that the views of citizens are heard. Parliament calls ministers to account for their proposals, policies and actions, and exercises scrutiny over them. In the Westminster model, parliament also sustains the government. As noted by Philip Norton, these functions are not mutually exclusive, but nor are they necessarily mutually

compatible: 'There is an inherent conflict in that most Members of Parliament are elected to support and sustain a particular government in office and, at the same time, are members of an institution that is expected to subject to critical scrutiny that very same government' (Norton, 2000: 3). Since this contradiction is generally resolved in favour of sustaining government, the executive has considerable power in the British parliamentary system, at least when the governing party has a comfortable majority. This has led to pressure for reform in order to strengthen parliament's scrutinising powers and bolster democratic control over the executive (see, for instance, Commission to Strengthen Parliament, 2000; Hansard Society Commission on Parliamentary Scrutiny, 2001; Modernisation Committee, 2002; Liaison Committee, 2002; Brazier, 2000).

### 3.1 Scrutiny mechanisms

There are four principal routes by which MPs can exercise their scrutiny function within the House of Commons: legislative procedure, debates on non-legislative business, parliamentary questions (PQs), both written and oral, and through the activities of investigative committees, including departmental select committees.

PQs tabled for written answer can be an effective means of extracting information from government, particularly information that the government might otherwise be unlikely to reveal (see, for instance, Public Administration Committee, 2002). But the government's answers to written PQs are rarely extensive, so MPs have to be careful about how they phrase questions and may have to resort to posing a series of questions in a particular area. Oral PQs are put to ministers in Question Time (including once a week Questions to the Prime Minister). They are broadcast on radio and television and so have a higher public profile, but they account for less than a fifth of all PQs and are more likely to elicit evasive or defensive replies from the executive (Rush, 2000; Flinders, 2001; Power, 1996).

Parliamentary debates provide all MPs with the opportunity to discuss and evaluate government policy and administration. They do not provide a vehicle for sustained and detailed scrutiny of ministers and their departments' activities, and they generally reflect the power of the executive: the government initiates the majority of debates (relating to necessary business, the government's annual programme, financial matters or particular policy areas), and those that end with a vote usually see the government prevail through its majority (Rush, 2000; Power, 1996). Pressure for parliamentary reform has included proposals for improving the scrutiny value of Commons debates, including more short debates and increased opportunities to debate select committee reports (see, for instance, Hansard Society Commission on Parliamentary Scrutiny, 2001). Westminster Hall debates were introduced in 1999 following a recommendation of the Modernisation Committee for the creation of a parallel chamber to provide additional opportunities for debating committee reports and other important matters that do not readily find time on the floor of the House (see Modernisation Committee, 2000).

The most significant parliamentary reform in recent decades was the creation in the House of Commons of 14 (now 17) departmental select committees in 1979. Each government department is now scrutinised directly by a select committee in the House of Commons. The International Development Committee (IDC) was established in 1997 when the new Labour government created DFID as a separate government department. Prior to that, the Overseas Development Administration – as part of the Foreign and Commonwealth Office (FCO) – had been scrutinised by the Foreign Affairs Committee (FAC). The departmental committees have generally enabled a significant expansion in scrutinising activity within parliament, and allowed for much more detailed, rigorous and sustained examination of individual ministers' and departments' policies, administration and operations. Committees can question ministers, civil servants, independent experts and interested individuals and organisations from outside the government, and any individual or organisation can submit written evidence for consideration by a committee.

The overall effectiveness of these committees is difficult to judge, however, not least because the level of activity and effectiveness of the different committees vary considerably. Each committee decides its own agenda, and committee chairs have considerable influence over the scope and focus of scrutiny. The select committees generally achieve a relatively high degree of bipartisanship, despite the fact that their membership reflects the government majority in the House and is largely controlled by party whips. Nevertheless, they cannot emulate the far more powerful and well-resourced US congressional committees, which are based on a clearer separation of legislative and executive powers and a looser party system (Hennessy, 1996; Rush, 2000). The select committees operate within a relatively limited remit, and have no formal role in the legislative or policy process. While they are empowered to make recommendations, they cannot force the government to accept them.

The overall impact of the committees should not be assessed purely in terms of their influence over policy, since their primary function is to hold the government to account through the *scrutiny* of government policy and administration (Drewry, 1989; Rush, 2000). However, a number of factors weaken the ability of the select committees to scrutinise government effectively.

First, according to the so-called 'Osmotherly Rules', civil servants may sometimes use the doctrine of ministerial responsibility to refuse to divulge the advice that they have given to ministers, and government departments are still often very reluctant to provide committees with detailed information to assist their inquiries. Ministers, in turn, may refuse to disclose information or the details of departmental discussions on the grounds that it is not in the public interest to do so (see Public Administration Committee, 2002).

Second, the business of government has expanded considerably over recent decades, and become increasingly sophisticated. Yet the parliamentary year is short, leaving committees only limited time to scrutinise a broad range of

policies and government/department activities. Most committees have limited professional research and other resources supporting their work, and so the committee system relies heavily on MPs' personal knowledge, interests and abilities (Hennessy, 1996). But MPs themselves have considerable demands on their time as a consequence of their constituency, party and parliamentary duties and interests (Leader of the House of Commons, 2001), and they usually have limited levels of specific expertise in particular policy areas. According to the Modernisation Committee: 'If the select committees are successfully to hold to account major Whitehall departments then we need to do more to balance the resources respectively available to Ministers and to those who hold them to account. It is often the case that a revealing answer can only be produced in response to the knowledge that enables a penetrating question to be formed' (Modernisation Committee, 2002, paragraph 27).<sup>2</sup> Where individual MPs or committees are not sufficiently informed, organised interests with superior knowledge and political muscle can exert greater and more direct influence over government legislation and policy. MPs may themselves come to rely on organised interests and lobby groups to provide a base of information to scrutinise and influence government policy.

Third, MPs have to balance a number of roles – including representing the interests of their political party and constituency – which compete with their role of scrutinising the executive and holding the government to account. According to a Hansard Society report, 'MPs are unclear about their duties and, in particular, about how they can and should hold the executive to account'; the report argues that parliament lacks a corporate ethos that promotes collective functions such as accountability, and that 'changes in the attitudes and behaviour of politicians themselves are as important as changes in the working of Parliament' (Hansard Society Commission on Parliamentary Scrutiny, Executive Summary). As noted by Norton, 'MPs elected to support a government have to be willing to question that government and, if necessary, say no to it. For new structures and procedures to be effective, MPs have to be willing to make use of them' (Norton, 2000: 3).

Fourth, government policies concern more than one minister and/or government department, because of the complex and inter-related nature of policy itself, and/or because of government efforts to strengthen cooperation between departments. The government's 1999 White Paper, *Modernising Government*, notes that in areas of government such as foreign and security policy, 'effective co-ordination and collaboration are the norm' (Her Majesty's Government, 1999). Select committees have been given the freedom to set up joint committees and to establish specialist sub-committees without requiring the permission of the Leader of the House, but 'joined-up scrutiny' through the establishment of joint committees remains more the exception than the rule.<sup>3</sup> Those committees that are set up to investigate issues across government, such as the Public Administration Committee and the PAC, cannot provide the level of detailed and specialised scrutiny provided by the departmental select committees. And while the departmental committees can take evidence from relevant

departments across Whitehall, each tends to concentrate on the department with which it is primarily concerned.<sup>4</sup> Thus, for instance, three committees conducted inquiries into the government's policies in Kosovo during 1999 and 2000: the IDC took evidence from DFID and the Secretary of State for Development; the Foreign Affairs Committee from the FCO and the Foreign Secretary; and the Defence Committee from the Ministry of Defence (MoD) and Secretary of State for Defence (International Development Committee, 1999; Foreign Affairs Committee, 2000; Defence Committee, 2000). There are clear advantages to departmental committees maintaining distinct interests and areas of concern, since this ensures that government is subject to specialised scrutiny based on a range of distinct accountability criteria. Nevertheless, parliament's overall scrutiny of government policies and actions could be weakened if the select committees' separate interests impede effective investigation of areas where there is close coordination and cooperation between different ministers and departments.

Proposals to strengthen the committees' scrutiny work have focused on increasing their independence (notably by reducing party political influence in the nomination of committee members and the appointment of chairpersons), increasing their resources (including the provision of more specialist and support staff) and systematising the focus of committee inquiries through establishing common objectives and core tasks (see Liaison Committee, 2000, 2001 and 2002; Modernisation Committee, 2002; and Hansard House of Commons Debates 14 May 2002, Col 648–731).

The PAC is the one House of Commons committee that has clear concerns and responsibilities across all government departments and agencies. The PAC was established in the nineteenth century to examine departmental accounts and to ensure that all expenditure approved by parliament has been properly and effectively spent. The PAC differs from the other select committees in that its role is as a financial watchdog more than a scrutiniser of the government's policies and departmental operations. It also has considerably greater resources to support its work, since it is assisted by the Comptroller and Auditor-General (C&AG) and the staff of the NAO. The NAO works for parliament rather than for the Treasury, and within parliament the PAC has a monopoly over NAO resources. The NAO enables the C&AG to undertake detailed analysis of departmental accounts and to direct the PAC to issues that warrant its attention. The PAC wields considerable influence compared to other committees: its scrutiny is generally considered authoritative, and government invariably accepts its recommendations.

There has been debate about whether the NAO should assist other select committees more directly, and since 1990 other committees have been able to look at unpublished NAO reports commissioned by the PAC if they are pursuing related investigations. However, no other committee is able to commission new reports from the NAO. The NAO therefore remains primarily focused on scrutinising financial rectitude, efficiency and value for money, which avoids it

getting drawn into potentially partisan political debates over policy.

In the House of Lords, the level of expertise and the quality of debates and questions surrounding government policy are generally high. However, the House of Lords has considerably fewer select committees than the Commons (only three permanent committees), and these tend not to duplicate inquiries conducted by the Commons committees. No designated House of Lords committee is directly concerned with development or humanitarian policy, and the House of Lords has no formal institutionalised involvement in any non-legislative policy processes associated with humanitarian policy.

#### 4. DFID and wider government political/strategic accountability and legal accountability

The elevation of the International Development Minister to cabinet rank and the creation of DFID as a separate government department in 1997 took the aid portfolio out of the control of the Foreign Secretary and the FCO. This separation of humanitarian aid and foreign policy is affirmed by the International Development Act of 2002, which specifies that the Secretary of State for International Development 'may provide any person or body with assistance for the purpose of alleviating the effects of a natural or man-made disaster or other emergency on the population of one or more countries outside the United Kingdom'.

However, at the same time as creating DFID, the new Labour government also started moving towards much more 'joined up' policy-making in both domestic and international policy. This was reflected in a 1997 White Paper, which signalled that the UK's responses to conflict, political instability, poverty and humanitarian assistance would involve the deployment of diplomatic and military instruments, as well as aid (DFID, 1997; see also Macrae and Leader, 2000: 23).

The alignment of humanitarian aid with foreign and security policies was reaffirmed by Foreign Secretary Jack Straw in 2002:

*where intervention is required, it has to be early and it has to be coordinated. Diplomacy by itself is not enough. Humanitarian and development aid by itself is not enough. Military action by itself is most certainly not enough. But bring these three together, within a clear overarching strategy, and we can far better secure and sustain the peace of the global community. This is the approach which we have adopted with success in Kosovo, Macedonia, East Timor, Sierra Leone and now Afghanistan. We have to build on this experience.*<sup>5</sup>

The linking of political/strategic responsibility in this area across departments is also reflected in the mission statement of the MoD, which specifies under Defence Mission E: 'Peace Support and Humanitarian Assistance Operations' that 'Where appropriate, and at the request of the Foreign and Commonwealth Office or Department for International Development, the Armed Forces contribute to humanitarian and disaster relief operations, either on a national basis or as

part of a coordinated international effort' (Ministry of Defence, 2001, Annex F).

This has led to controversy about the extent to which DFID's emergency aid and other development policies might be subordinated to the government's wider international political objectives, despite the formal separation of the aid portfolio from the FCO. Concerns raised by a number of NGOs about the apparent 'politicisation' of the UK's humanitarian response in Sierra Leone in 1997–98 were followed by similar charges relating to the UK's humanitarian policies in Afghanistan before September 2001 (see International Development Committee, 1999b; and Macrae and Leader, 2000).

These debates have been fuelled by an overall lack of clarity in the parameters of individual ministers' and their departments' core objectives and responsibilities in this area. It is noteworthy that the International Development Act 2002 does not define humanitarian assistance, nor does it define or limit how that assistance should be provided, with what objectives or against what criteria. Moreover, the single reference to humanitarian assistance in the Act is couched in permissive terms, allowing rather than requiring the minister to respond to humanitarian emergencies. Therefore the domestic legal accountability of individual ministers, departments and the wider government is relatively weak in this area.

In a meeting with chief executives of British humanitarian NGOs in 1999, Short acknowledged that a perception of the humanitarian response as part of, or linked to, the overall political agenda 'would directly and disastrously compromise the impartiality and universality of humanitarian aid'. She therefore underlined the need for 'an open, on-going and constructive dialogue ... to explore the potential of policy coherence, and the respective boundaries of, and differences between, humanitarian and foreign policy objectives' (DFID, 1999a: 3)

#### 4.1 Effectiveness, accountability and DFID's strategic objectives for humanitarian aid

Since she came into her job five years ago, Short has introduced greater care over the disbursement of humanitarian aid, particularly in conflict situations, and has advocated a new interpretation of humanitarian principles so that responses can be more alive to the political conditions in the countries where assistance is delivered. According to this new approach, humanitarian assistance should not only be principled, but must also be effective. In order to be both principled and effective, assistance must be politically informed (Macrae and Leader, 2000). Thus, beyond the general commitments set out in the 1997 White Paper – to save lives through emergency relief, to protect and rebuild livelihoods and communities and reduce vulnerability, to provide swift and appropriate assistance based on analysis of need, to work towards better disaster preparedness and prevention, and to seek improved standards, conduct and partnership across the humanitarian system – DFID has resisted committing itself to a rigid policy or accountability

framework that might limit its strategic control and flexibility over the use and disbursement of emergency aid funds. As explained by one interviewee for this study, DFID does not want to have to respond automatically to every emergency across the world.

The concern to introduce more 'politically astute' humanitarian policies is reflected institutionally in the linking of humanitarian assistance and conflict reduction and prevention policies within a single department within DFID, the Conflict and Humanitarian Affairs Department (CHAD), and is confirmed at the strategic policy level in a policy statement published in 2000, entitled 'Conflict Reduction and Humanitarian Assistance' (DFID, 2000). Although this policy statement confirms the close association of DFID's conflict reduction and prevention policies with humanitarian assistance, it also affirms DFID's commitment to the ten 'Principles for a New Humanitarianism' set out by Short in 1998. It also outlines DFID's strategies for implementing these principles, including the commitment to remain impartial and to promote a more universal approach in addressing humanitarian needs. Nevertheless, the linking of humanitarian assistance with conflict reduction and prevention has made it more difficult for DFID to rebuff charges that its humanitarian assistance might at times be subordinated to broader foreign and security policies (see, for example, Macrae and Leader, 2000).

#### *DFID's principles for a new humanitarianism*

We will seek always to uphold international humanitarian law and human rights laws and conventions.

We will seek to promote a more universal approach in addressing humanitarian needs. People in need – wherever they are – should have equal status and rights to assistance. We will seek to work with others whose efforts are also aimed at tackling the underlying causes of a crisis and building peace and stability.

We will seek to work with other committed members of the international community and, in particular, seek partnership across the North/South divide to secure better international systems and mechanisms for timely joint humanitarian action.

We will agree 'ground rules' that prevent diversion of humanitarian goods and collusion with unconstitutional armed groups.

We will be impartial – our help will seek to relieve civilians' suffering without discrimination on political or other grounds, with priority given to the most urgent cases of distress.

We will seek the best possible assessment of needs, and a clear framework of standards and accountability for those who work to deliver DFID's assistance.

We will encourage the participation of people and communities affected by crises to help them find long-lasting solutions which respect their rights and dignity.

We will, where possible, seek to rebuild livelihoods and communities, and build capacity so that communities will be less vulnerable to future crises.

We recognise that humanitarian intervention in conflict situations often poses genuine moral dilemmas. We will base our decisions on explicit analyses of the choices open to us

and the ethical considerations involved, and communicate our conclusions openly to our partners. (Department for International Development, 2000)

DFID's new focus on the effectiveness of its humanitarian aid reflects, in part, the broader pressures on all public sector institutions in the UK to deliver and account more clearly for the effective and efficient use of taxpayers' money. The UK's total development assistance programme was £2,815 million in 1999–2000, making it the fourth-largest donor after Japan, the US and Germany. DFID's expenditure on humanitarian assistance totalled £323m in 1999–2000, nearly double the 1997–98 figure of £186m. In 1997–98, humanitarian assistance was divided relatively equally between bilateral assistance (£94m) and multilateral assistance (£92m), the latter including £72m channelled through the European Community and £20m through UN agencies. Although its multilateral humanitarian assistance has remained relatively stable in recent years, at around £85m–£100m, the proportion of assistance that DFID disbursed bilaterally through NGOs, Red Cross organisations and earmarked funding to UN agencies in 1999–2000, £221m, was more than double the £102m in unearmarked assistance through multilateral agencies. Even if temporary, the relative increase in bilateral humanitarian assistance reflects DFID's concern to ensure the effective use of its humanitarian aid funds. This has been particularly evident in Kosovo, where DFID has been channelling around a fifth of its total humanitarian aid budget (£66.5m in 1999–2000 for Kosovo and other former Yugoslav states), but where it did not have full confidence in the effectiveness of UN agencies.

DFID has also expanded its direct operational involvement in humanitarian emergencies. Responsibility for humanitarian programmes was formally shifted to DFID's regional desks in 1997, with CHAD principally as a policy unit. In practice, however, CHAD retained significant programmatic responsibilities, and is now effectively managing DFID's rapid-onset assistance programmes, with the regional desks maintaining the lead on assistance in situations of chronic humanitarian need. CHAD has its own operations team, 'CHAD Operations', which is supplied by a private firm working under contract to DFID.<sup>6</sup> CHAD Operations comprises a core staff of 26, plus a pool of specialist consultants brought in on short- and medium-term contracts for specialist services. There is a complex division of responsibilities between CHAD and CHAD Operations, and in practice the dividing line between the two is blurred. However, the primary function of CHAD Operations is to provide logistics support to CHAD/DFID, providing a direct field presence in rapid-onset humanitarian emergencies in order to undertake assessment and analysis of conditions on the ground, and to undertake contingency planning and project management, monitoring and training. The operations team also manages a stockpile of emergency equipment; it supports CHAD in policy and programme work with the Red Cross and European Community and represents DFID in humanitarian coordination bodies; and it manages in-kind support to UN agencies agreed under the Institutional Strategy Papers (ISPs).

Assisted by the field assessments fed in by CHAD, the Secretary of State and DFID maintain a high degree of executive and administrative discretion over the overall allocation and disbursement of humanitarian aid funds. Funds for 'predictable' emergency expenditure and ongoing conflict and humanitarian assistance are incorporated within the relevant bilateral country and regional programmes. 'Unpredictable' emergency expenditure is funded through three separate budget lines: (a) a bilateral budget line for conflict and humanitarian assistance; (b) a multilateral budget line for conflict and humanitarian assistance; and (c) the departmental 'contingency reserve'.<sup>7</sup> In the event of an emergency for which it does not already have adequate funds available within its budget, DFID may also draw down resources from central government reserves via the Treasury.

Flexibility may be considered essential to enable DFID to respond to emergencies at a level and through the channels that it considers most effective. However, a policy framework that enhances effectiveness does not necessarily enhance accountability. Despite the overarching concern with effectiveness, DFID has yet to formulate a relevant PSA target for humanitarian assistance. A joint DFID, FCO and MoD PSA target on conflict reduction and prevention does not extend to humanitarian assistance.<sup>8</sup> And while DFID does develop detailed objectives and strategies for major humanitarian emergencies which are communicated to parliament through statements of the minister, answers to PQs and/or memoranda to select committees, these do not establish overarching objectives or targets for DFID's emergency aid programme as a whole. Taken on their own, they would not have any bearing, for instance, on the overall balance of emergency aid that DFID disburses to different situations of humanitarian need and through different channels.

As argued by Macrae and Leader, 'deciding whether and if the conditions for effective humanitarian engagement are in place is in fact a highly political process' (Macrae and Leader, 2000: 25). The discretion that DFID maintains and exercises in the disbursement of its emergency relief funds means that the strategic policies and political decisions that might affect the overall allocation of humanitarian aid remain relatively resistant to effective external scrutiny, whether through formal parliamentary channels or by other stakeholders, such as implementing agencies and the media. Indeed, on the issue of whether DFID assistance funds will be forthcoming in a humanitarian emergency, DFID's 2000 policy statement on conflict reduction and humanitarian assistance contains a major caveat. Under the heading of the safety of humanitarian workers, it states that:

*In some cases we may have to advise NGOs to withdraw their international staff or suspend operations. There may be more extreme circumstances when DFID may have to cease funding completely. These include situations where there are serious security risks or concern that any harm to staff could lead to wider negative implications; or if it is proving impossible to keep to humanitarian principles and deliver help effectively to those who need it. We seek to discuss the reasoning behind such decisions as fully as possible with the agencies concerned. But when there are complex security*

*considerations, it is not always possible to publicly share all the information that may be available to us.*

In an internal paper to the DFID Management Board, DFID's own evaluations department expressed concern over the fact that DFID's PSA does not address the full range of DFID's policy as set out in its two White Papers since, it argued, 'objectives which are not regularly monitored are unlikely to be achieved' (DFID, 2001b: 9). While the headline policy commitments on humanitarian assistance set out in the 1997 White Paper and DFID's 2000 policy statement are clear enough in themselves, without any clear link to a relevant PSA or to any other formal accountability mechanism, it is less clear how DFID's performance against these objectives will be monitored and reported on, whether internally or externally.

Even with maximum transparency, the complexity and variability of humanitarian crises make it very difficult for external actors to analyse and compare DFID's humanitarian responses to assess whether funding has been allocated in accordance with its humanitarian principles. DFID's annual report to parliament on its aid programme includes a short section and supporting budgetary information on conflict and humanitarian policies. But this does not provide the detail needed to measure DFID's policies and performance against the principles and other objectives set out in the 1997 White Paper and its 2000 policy statement on conflict reduction and humanitarian assistance. There is little doubt that humanitarian principles inform the strategies developed for particular emergencies and are applied to the running of individual programmes. However, there is considerable scope for conflict between the different principles, and between these principles and other areas of government, such as foreign and security policies. In addition, there appear to be different interpretations between DFID departments concerning the implementation of these principles (Macrae and Leader, 2000: 26). The 2000 policy statement does not attempt to link the principles to clear objectives and strategies relating directly to DFID's own performance and policies at different levels, since the strategies for assistance detailed in the document relate principally to partner and other organisations delivering assistance on the ground. Questions therefore remain about consistency of application across DFID departments and between different humanitarian programmes, and about how or whether DFID is accountable for the application of these principles in practice.

DFID's PSA and supporting SDA are currently being updated for the 'third generation' phase through to March 2005, and the next PSA is likely to link particular targets more closely with DFID's internal structures so that each director will become more directly responsible for achieving particular targets. It is possible that the new PSA will include a target relating directly to humanitarian assistance. If so, it will be interesting to see whether the headline objective for humanitarian aid will emphasise the results or the process of humanitarian aid, and whether it will emphasise DFID's role as a strategic actor in its own right, or its role as a more neutral enabler in the international humanitarian system. As with many of its other policy areas, DFID faces a problem in developing an appropriate performance target at this level,

since a target phrased in terms of overall outcomes will be difficult to relate specifically to DFID's individual performance, particularly in complex and fast-changing humanitarian emergencies. Meanwhile, a target phrased in terms of process (for instance, quick and appropriate responses) will not say very much about results.

DFID's formal corporate-level commitments in this area remain focused on process targets and objectives more than results, and so the emphasis in DFID's formal accountability for its performance is primarily on its role as a service enabler and funder. Thus, while there is currently no PSA target for humanitarian assistance, a service delivery (SDA) target specifies that DFID will seek to reduce the impact of violent conflicts and man-made and natural disasters 'by the provision of timely, effective, coordinated emergency assistance in response to crisis situations' (Department for International Development, 2001a).<sup>9</sup> Although both the PSA and SDA note that the Secretary of State is ultimately responsible for their delivery, there is a risk that the managerial accountability of civil servants to the minister and (directly or indirectly) to parliament for service delivery could overshadow ministerial accountability to parliament for strategic policy.

#### 4.2 External scrutiny at the strategic level: the International Development Committee (IDC)

The IDC is the principal parliamentary body responsible for scrutinising DFID's policies. Since it was established in 1997, the IDC has undertaken a number of inquiries into specific humanitarian crises: Montserrat (International Development Committee, 1997 and 1998a), Sudan (International Development Committee, 1998b), Kosovo (International Development Committee, 1999a and 1999b), Mozambique (International Development Committee, 2000a) and Afghanistan (International Development Committee, 2001). In addition, a major inquiry in 1999 on conflict prevention and post-conflict reconstruction included DFID's humanitarian policies in Sierra Leone (International Development Committee, 1999b). For each of these inquiries, the IDC considers detailed written and oral evidence provided by the Secretary of State for International Development, DFID officials, NGOs and UN and/or Red Cross agencies working in the countries concerned and academics. Inquiries sometimes involve a brief visit by committee members to the field to witness relief operations directly, and to meet and discuss these operations with agency staff and/or beneficiaries.<sup>10</sup>

Although not all humanitarian emergencies are subject to IDC inquiries, this level of scrutiny represents a very considerable advance in overall parliamentary attention to humanitarian policy. When the Overseas Development Administration (the predecessor to DFID) was part of the FCO, humanitarian policy was subsumed within the wide-ranging remit of the Foreign Affairs Committee, and therefore subject to much less frequent and detailed examination. In its first year, the IDC had undertaken two major inquiries into two high-profile and controversial humanitarian programmes – Montserrat and Sudan – both

of which led to a detailed and relatively robust critique of DFID and/or wider government policy, and a number of significant policy recommendations. In the case of Montserrat, for instance, the committee concluded that there had been:

*too many decision makers involved in the delivery of aid to Montserrat. ODA/DFID attempted to combine emergency and development aid in its response to events. This was a mistake. The volcano had not ceased to be active. The emergency was, and is, cumulative. Thus the use of accounting procedures and administrative structures designed for other circumstances was cumbersome and resulted in some delay and confusion* (International Development Committee, 1997, paragraph 69).

In the case of Sudan, the committee recommended that the government reassess its lines of communication, observing that DFID 'could have done more in late 1997 and early 1998 to respond to OLS warnings, relying less on the usual OLS/WFP processes' (International Development Committee, 1998, paragraph 36). The committee concluded that:

*Given the need for significant assistance to Sudan over many future months, the continuing uncertainty as to the extent of the famine, and the remaining amount necessary to meet the UN appeal, we consider it to have been premature of the Secretary of State to announce in such bald terms that there was no lack of money or resources for Sudan* (International Development Committee, 1998, paragraph 39).

However, the limited power of the committee over the government's policies was reflected very early on in its decision to undertake a follow-up inquiry into the Montserrat crisis. This was necessary, the committee argued, because it was unhappy with the government's response to its first report. The committee complained that:

*one of the conclusions in the Report and two substantive recommendations were simply ignored by the Government in the reply. In our view this alone is enough to justify our decision to invite both the Rt. Hon. Robin Cook MP, Secretary of State for Foreign and Commonwealth Affairs, and the Rt. Hon. Clare Short MP, Secretary of State for International Development, to return to the Committee to give further evidence ... This Report thus examines the three points omitted from the original Government response and discusses certain other unsatisfactory aspects of the Government's current position* (International Development Committee, 1998a, paragraph 1).

The power of the IDC over government is limited by the institutional and political limits to the powers of all the select committees. There are also a number of additional factors related to the way the committee works.

The committee lacks research resources to support its inquiries effectively. This means that only five permanent staff support its inquiries: two committee clerks, a committee specialist, a committee assistant and a secretary. Individual IDC members have their own assistants who can be directed towards research to support committee work, but this is not a reliable supplement to the committee's own resources.

The IDC only occasionally brings in specialist advisers. The lack of professional research staff limits the ability of the committee to undertake its own assessment and analysis of DFID policies and activities.

Committee business tends to be driven by what the committee members are personally interested in, and the knowledge base depends very much on individual members' own expertise and interests. Although the IDC has considerably more specialised knowledge of development and humanitarian issues than did the Foreign Affairs Committee, there is no guarantee that the committee members will be equipped to scrutinise humanitarian policy closely, or will choose to do so.

The lack of PSA targets or other explicit high-level strategic objectives for the government's humanitarian policies makes it more difficult for the IDC to scrutinise DFID's policies or assess its performance at the strategic level. The overall lack of joined-up scrutiny across committees in the House of Commons inhibits the comprehensive investigation of areas of humanitarian policy that involve close cooperation and coordination between different government departments and the prime minister. It also restricts the criteria against which individual committees are likely or able to assess government policy. The IDC, for instance, may be relatively well equipped to scrutinise DFID's aid policies against humanitarian need criteria, but may be less well equipped to scrutinise the political implications of these policies. The Foreign Affairs Committee, meanwhile, may be prepared to investigate the political aspects and implications of the government's 'humanitarian' foreign policy in a particular situation, and the Defence Committee the military aspects (such as NATO policy in Kosovo), but they will be less well placed to scrutinise the implications of – and for – the delivery of humanitarian assistance and protection. The importance of understanding and assessing the relationships between political, military and humanitarian action was highlighted in the Defence Committee's 2000 report, *Lessons of Kosovo*. In its conclusions, the report noted that:

*Much more thought needs to be given to the consequences of mixing military operations and humanitarian support operations, where the successful management of the latter is critical to the success of the former. We must anticipate the manipulation of humanitarian crises as part of the strategy of future adversaries, and measures to forestall or ameliorate these effects should be a central part of military doctrine and strategic planning. There is still much room for improvement in the co-ordination and integration of the military with other agencies involved in humanitarian operations. This cannot be left until the crisis is upon us* (Defence Committee, 2000, paragraph 329).

Unlike most other select committees, the IDC does not have a domestic constituency of beneficiaries (such as users' or consumer groups) to consult directly about the government's performance. IDC members occasionally visit the scene of humanitarian operations to consult relief workers and aid beneficiaries directly. However, these field visits are only brief, and do not provide a basis for continuing and detailed dialogue and consultation with aid beneficiaries.

This, and the fact that the IDC's own research resources are limited, means that the committee relies heavily on NGOs as a surrogate constituency of interest and as a source of information. This has a number of important consequences for the nature and quality of the committee's inquiries.

First, NGOs are not neutral actors in the humanitarian sphere: they have their own programme, funding and media profile interests, and have active advocacy agendas directed towards the British government and other donors. The IDC is seen as an important advocacy target for those NGOs wanting to exert influence over DFID or wider government policy. And yet, the majority of NGOs concerned with the UK government's humanitarian policies are also likely to be recipients of DFID funding. There is therefore a possibility that NGOs' own scrutiny activities and any advocacy directed towards DFID will be influenced by funding considerations. The committee's concern over this aspect of its relationship with NGOs was confirmed by one IDC member, who commented that 'the IDC primarily tries to bring into the public arena the criticisms made by third parties, and predominantly NGOs ... but NGOs are unreliable whistle-blowers in the area of emergency aid because they have their own interests at stake; they are too concerned with fundraising'.<sup>11</sup>

Second, whilst NGOs have invested considerable effort in strengthening their downward accountability to beneficiaries in their humanitarian operations, the extent to which they can or do represent the true interests of aid beneficiaries and other populations affected by humanitarian emergencies and relief operations remains questionable. Moreover, there is frequently a disjuncture between NGOs' advocacy activities in the UK and their operations and experience in the field. As competitive service providers in the international humanitarian system, NGOs cannot necessarily provide an entirely reliable conduit for communicating the interests and concerns of beneficiaries, who are the 'consumers' in that same system.

Third, NGOs have no formal responsibility to scrutinise or account for DFID's policies and performance in this area, and may not, in fact, invest any significant resources towards doing this. Of all the written memoranda submitted by NGOs and other operational humanitarian agencies to the IDC's inquiry into humanitarian assistance in Afghanistan, only two – by WFP and UNICEF – mentioned DFID, and these (brief) mentions were only in the context of providing information about which of these agencies' operations were being funded by DFID. No NGOs commented on DFID policy or performance in their written evidence to the committee. Instead, NGOs submitted evidence relating to the general humanitarian situation and challenges facing humanitarian agencies in their efforts to deliver assistance.

A further factor limiting the IDC's capacity for scrutiny stems from the potentially wide range of complex policies and issues that it may examine, and its limited time. The attention that the committee devotes to humanitarian assistance tends to be concentrated on discrete inquiries into particular humanitarian emergencies, usually about once a year. The focus of these inquiries – usually topical

humanitarian emergencies receiving considerable attention in the media – reflects the pressure that the committee feels to respond to media interest, since, as explained by one committee member, this is a key channel through which public concerns are articulated and communicated to parliament.<sup>12</sup> Because it devotes a considerable proportion of its limited time and resources to these inquiries, the committee is probably less likely to devote additional time to look at cross-cutting themes and examine the government's humanitarian policies at a more general or strategic level, or to scrutinise DFID's policies in emergencies that do not figure so prominently in the domestic media.<sup>13</sup>

These inquiries are usually undertaken shortly after the onset of a particular emergency. This means that the committee's attention tends to focus on immediate operational questions, since these usually dominate in the midst of a humanitarian crisis. Yet given the limited research resources at its disposal and the short time-span within which its inquiries are undertaken, plus the complexity of the humanitarian crises concerned and the multiplicity of aid actors involved, it is extremely difficult for the IDC to single out DFID's policies and impact. The committee is unlikely to be able to draw on detailed evaluations of donors' and operational agencies' policies and programmes to help to inform its scrutiny, since evaluations of this kind would normally be completed at a later stage.

The timing and choice of topics for its inquiries indicate an implicit intention on the part of the committee to influence policy, as much as to scrutinise it. In Afghanistan, for example, the committee launched an early inquiry because it wanted to be able to make a difference to the UK's response as it was under way.<sup>14</sup> According to one source, 'there is a danger that if they launch an inquiry too early, they won't be able to get the best analysis and can't work out the best recommendations to inform future policy; on the other hand, if they go too late, they probably won't be able to make much difference to policy in that particular situation, and there's a lot of information that can't be collected after the fact'.<sup>15</sup>

NGOs consider the IDC an important channel through which to influence government policy, and so may encourage it to adopt more of an influencing role. Given the committee's limited power over government policy, there is a risk that the government may ignore many of its recommendations, which could, in turn, erode its authority. However, the committee praises DFID policy more often than it criticises it, so its authority is not tested to the extent that it might be in a more adversarial context.

#### 4.4 The media and NGOs

Informally, the media, NGOs and academics can play a significant role in holding the government to account for its humanitarian policies, particularly when they bring pressure to bear jointly. As in parliament, NGOs play a pivotal role, since the media relies on NGOs to supply much of the material and inform the 'spin' for particular stories. Since policy debate in the media is conducted so much through

sound-bites and by-passes most of the detail relating to the management and delivery of humanitarian operations, and since the scrutiny that it applies tends to be directed at government as a whole rather than any particular department, this represents a particularly important driver of government accountability at the political/strategic level. Ministers are particularly sensitive to media pressure because of the close relationship between the media and domestic public opinion, and are therefore probably more responsive to media scrutiny than their departments, and perhaps sometimes more responsive to the media than to the pressure exerted by parliamentary committees (Norton, 2000).

While powerful, the media is also an unreliable driver of accountability at any level. This was commented upon by the IDC in its report on the humanitarian crisis in Afghanistan:

*The response of the media to the crisis has been disappointing. A great deal of attention has been paid to the military side of the campaign with little devoted to the humanitarian crisis ... Once the Taliban began to collapse and access to the most vulnerable people was possible the world's media still chose to follow the military. What little coverage of the humanitarian crisis there has been has focused on refugees and the refugee camps while the real crisis is inside Afghanistan among the internally displaced and vulnerable populations. A few reporters have chosen to focus on the humanitarian crisis but much more could be done to show the world the true nature of the crisis and the difficulties the humanitarian effort faces every day (International Development Committee, 2001, paragraph 83).*

## 5. DFID's managerial accountability

The UK public sector changed significantly during the 1980s and 1990s, with attempts to make managers more accountable for the efficient and effective deployment of public resources. This, along with general pressure on aid budgets, has contributed to pressure for DFID to reform its management systems to become more effective and results-oriented (Development Assistance Committee, 2000a: 3; and Department for International Development, 2001b). This is reflected in DFID's explicit adoption of a results-based management system, with renewed emphasis on improving performance and strengthening accountability for performance at all levels within the department. This is reflected in DFID's PSA, SDA and other performance targets, which have become more closely associated with poverty reduction outcomes, rather than with process or activity.

Results-based management and measurement can take place at three organisational levels: (1) project level; (2) unit/country level within the department; and (3) department-wide level. Results-based management depends on the appropriate monitoring and measurement of how well the particular department and/or unit or project is performing. This, in turn, depends on the development of clear objectives at each level, relevant indicators and setting of targets against those objectives, effective performance monitoring (collecting data on results), and the analysis and reporting of

those results against the original targets (Development Assistance Committee, 2000a: 3).

Performance measurement systems are in many ways more difficult for DFID to apply than for other government departments. This is due, among other things, to the wide diversity of countries and contexts that it works in, and the diversity of programmes and projects that it supports. DFID has multiple (and sometimes conflicting) accountability relationships, to domestic authorities *and* to international and national partners, to clients and to civil society. There is a lack of standard results indicators that can be easily aggregated across these different programmes and projects, and it is difficult to attribute particular outcomes to DFID and/or its implementing partners when DFID is typically only one of a number of significant actors involved in any particular emergency or development context (Development Assistance Committee, 2000a and 2000b; Department for International Development, 2001b). This is acknowledged in a recent NAO report on DFID's performance management, which noted that:

*There are ... challenges to effective performance management and measurement in the field of development. The timescales for discernible results to show through are often longer than those set for public expenditure, monitoring and reporting. Development agencies may not know exactly what impact their efforts are having given the wide range of other agencies and external political, economic and social factors involved. Country programmes run by decentralised teams in the field may not be fully integrated into the high level objectives their agency is pursuing. And there may be problems with the quality of performance data available in developing countries (National Audit Office, 2002: 2).*

DFID's SDA nevertheless includes a clear commitment by DFID's top management to assess performance against the PSA and SDA targets. Monitoring and reporting on performance against these targets includes biennial reviews of key country programmes, analysis of progress against service departments' service level agreements and, as part of the annual departmental resource allocation round, auditing by the Internal Audit Department. In addition, DFID's evaluation department plans to commission an annual independent 'development effectiveness report', which will be timed to coincide with the internal resource allocation round. The SDA also commits DFID management to a range of new initiatives to improve performance across the department, including new systems of monitoring performance through backward- and forward-looking annual reviews of progress against the objectives established in country and institutional strategy papers, and regular reviews of centrally funded initiatives. In-depth reviews of this kind are to be conducted every three to five years.

Despite these commitments, measuring results and attributing responsibility for impacts is difficult in fast-changing and complex humanitarian emergencies, often involving large numbers of bilateral, multilateral and non-governmental humanitarian actors and/or local interlocutors. DFID's accountability for the results of its activities is further weakened by the relative absence of the 'demand side' from the accountability cycle. Unlike development aid, where

donors are held at least partially to account by recipient governments and state actors, the recipients of humanitarian aid are not able to hold donors and other actors to account for the results of humanitarian assistance on the ground.<sup>16</sup> The accountability cycle relating to humanitarian aid is therefore almost entirely dominated by 'supply side' actors. At all levels, the monitoring, measuring, reporting and evaluation of performance is conducted by these actors themselves, or by other suppliers in the humanitarian system.

It is largely due to concern to strengthen the role of beneficiaries that DFID has provided financial support to the Geneva-based Humanitarian Accountability Project, which was established in 1997 with the aim of providing a voice for people affected by disaster and conflict. As noted by one source:

*There isn't a customer with a voice in the way that there would in most areas of domestic policy, or even in most areas of development policy. The actual customer is probably the British public, and everyone assumes that they're happy if the recipients of humanitarian aid are happy, but where is the evidence that recipients are happy? ... One could argue for more evaluations, but who would carry out those evaluations and what would be their motivation? ... The Treasury should be quite worried about the fact that there is absolutely no customer 'test' when it comes to humanitarian aid.<sup>17</sup>*

The difficulty of measuring and attributing impacts and outcomes on the ground, coupled with the lack of an authentic customer voice in the accountability cycle, has almost certainly impeded results-based management in this area, therefore reinforcing the overall focus on process and outputs in DFID's formal corporate-level commitments relating to humanitarian assistance.

## 5.1 Performance measurement at project level

Performance measurement is best established at the project level. It is concerned both with the implementation of projects and with the results. Implementation measurement focuses on project inputs and activities against project budgets, work plans and schedules, whereas results measurement is concerned with whether actual results were achieved as planned (in terms of immediate outputs, intermediate outcomes and long-term impacts).

DFID uses project log frames based on a five-level hierarchy of project objectives and strategies to support the design, planning, implementation and monitoring of individual projects. Agencies applying for DFID's emergency funds are required to complete log frames for all projects greater than £100,000, and encouraged to complete log frames for smaller projects. The log frames must specify *inputs* (at the bottom of the hierarchy) that are used to undertake project *activities* that lead to the delivery of *outputs* (goods/services), that in turn lead to the attainment of the project *purpose* that contributes to the project *goal* (Development Assistance Committee, 2000a: 5–6).

Reporting is a central part of the project cycle, and is seen as an important management tool designed to enable lesson-

learning and ensure quality control for the benefit of beneficiaries and other stakeholders, and to assure DFID that its funds are being used effectively and efficiently. For projects of less than three months' duration, implementing agencies have to submit a Final Project Report to DFID within three months of the end of the project. For longer projects, they must provide Interim Progress Reports, usually at quarterly intervals. Agencies must also provide DFID with annual audited accounts for the financial years that they have received or held DFID funds, and certification that the grant was expended in accordance with the terms agreed with DFID. In addition, CHAD's own staff and/or external consultants inspect implementing agencies' activities on the ground. In a major crisis, there will be one field visit at the beginning (to inform strategy) and one at the end (signing off). In a chronic humanitarian crisis, CHAD will conduct field reviews at least every six months.

In theory, the same procedures should apply to DFID's internal monitoring and evaluation of emergency assistance projects as to development projects administered by the regional departments. DFID now has a much clearer auditing trail and closer tracking of humanitarian expenditure than in the past. However, most emergency aid is disbursed as a rapid short-term response through third-party implementing agencies. For instance, DFID has introduced formal output-to-purpose reviews of larger projects that require managers to annually assess progress towards the delivery of intended outputs and outcome, and to assign performance ratings to individual projects. But many emergency projects fall under the threshold of £0.5m, and are over too quickly to be fully subject to effective reviews of this kind.

DFID's reliance on self-assessment by third-party implementing agencies and the challenges that this poses in the area of emergency aid was picked up in an NAO report on DFID's response to the humanitarian crisis in Kosovo. The NAO noted that:

*the Department have committed some £18 million to projects carried out by non-governmental organisations. However, the Department's field offices have not consistently asked grant recipients to report back to them on how the money has been used. At the time of our visits, the Department did not have in place a clear programme of visits to projects and the results of those visits had not been recorded in a systematic way. The importance of a fully effective monitoring regime was underlined by the corrective action taken as a result of those visits undertaken by field offices, and by our visits to projects, when we found that not all had been implemented according to plan. The Department acknowledge that it would have been desirable for project visits to have been more systematic, but told us that it took time to develop their arrangements because of the sheer pace of events and the large numbers of projects approved in a very short period of time (National Audit Office, 2000: 7).*

Because much of the assessment and evaluation of humanitarian projects is undertaken by the operational agencies themselves, DFID is focusing considerable resources on strengthening the accountability and performance of its implementing partners. Again, the focus is on DFID as an enabler, rather than as a strategic actor in the humanitarian

system. DFID has put funding towards the 'Sphere' initiative on common standards for technical performance in humanitarian responses (see Christoplos, 1999). And DFID's new generation of funding-linked agreements with the Red Cross and UN humanitarian organisations based on 'Institutional Strategy Papers' focuses very much on building the capacity of the implementing partner agencies to respond effectively and accountably. The end-point that DFID is aiming for is for all necessary monitoring and evaluation to be carried out appropriately by implementing partners, supported by DFID auditing on a sample basis.

## 5.2 Performance measurement and assessment at unit and department level

Focusing too exclusively on the project as the unit of analysis for performance measurement has increasingly come under criticism because project log frames cannot incorporate the 'bigger picture' in terms of donors' and implementing agencies' higher-level strategic and longer-term objectives and impacts (Development Assistance Committee, 2000a: 9). Yet assessing results or impacts above project level is also problematic, largely because of the difficulty of attribution (Department for International Development, 2001b: 9). There is also a tension between 'managing for results' and 'accounting for results' – i.e., between monitoring and evaluation in order to support learning and improve management, and monitoring, evaluation and reporting to strengthen internal and external accountability (Development Assistance Committee, 2000a: 16–17; and Department for International Development, 2001b: 7). This tension is likely to be all the more acute in the case of emergency assistance and reconstruction because of the time-scale constraints and the complex and fast-changing situations in which humanitarian aid is usually delivered.

Internal processes of performance reporting within DFID – 'accounting for results' – centre on the annual resource allocation round. All units and departments within DFID have to report annually to the Management Board, detailing what they have achieved and what lessons they have learnt. All have to produce a forward set of objectives and bid for resources on the basis of new and old priorities. To complement this annual reporting cycle, DFID is introducing 'end of cycle reviews', which are concerned not only with reviewing progress against strategies, but also reviewing fundamental issues around staffing, skills and organisation to deliver results. These review activities are supported by a 'performance assessment network' coordinated by DFID's evaluation department.

The linking of performance reporting and reviews to resourcing decisions raises the question of the reliability of self-assessment, since this system inevitably creates incentives for units and departments to report their performance in a rosy light (Department for International Development, 2001b: 11). DFID's evaluation department has noted that DFID's external audiences 'will be concerned with the degree to which self-assessment is complemented by genuinely independent checks', and that it is important to be clear what is meant by 'external review': there is a

difference between reviews by external consultants contracted and managed by the department whose programmes are under review, and 'arm's length' reviews conducted by another unit not responding to the same manager as the unit under review (Department for International Development, 2001b).

To complement self-assessment by individual departments and units, DFID has also developed performance measurement systems designed to enable overall performance rating at the departmental and corporate levels, which includes the aggregation of project scoring data collected through 'output-to-purpose reviews' and project completion reports. DFID has also developed an automated management database system (PRISM) that should include a wide range of project information including performance ratings and scores. However, for all the reasons noted above less useful project-scoring data is likely to be available for emergency humanitarian response and reconstruction projects than for bigger and/or longer-term development projects. There is also concern among operational departments within DFID over the allocation of single scores to complicated projects, and about aggregating scores from a range of diverse projects that are implemented in different country contexts. And there is concern that project scoring may put too much emphasis on quantitative indicators at the expense of qualitative factors, and on output factors that are relatively easily attributed to particular projects, as opposed to outcomes for which a range of actors may be responsible (Development Assistance Committee, 2000b: 95). Moreover, performance measurement based on aggregating project scores would reveal very little about how CHAD, the regional desks and other departments within DFID are performing in terms of achieving any higher-level policy and strategic objectives.

Because they allow for more qualitative and in-depth analysis of particular activities at a range of levels (from individual projects up to the macro policy and international levels), evaluations represent an important supplement to these formal performance measurement and reporting systems. Although only conducted on a selective basis for projects or programmes of particular interest or concern to DFID's management, they are more likely to focus on qualitative issues, and more likely to reveal not only what kind of performance was achieved by a particular project, programme or agency, but also how and why. Evaluations contribute not only to external performance reporting, but also to internal management learning and decision-making.

Evaluations therefore play an important role in 'managing for results' within DFID. However, because humanitarian aid only accounts for a relatively small proportion of DFID's overall spending and because DFID's central evaluation department is focusing resources increasingly on annual synthesis studies, the evaluation department would probably only look closely at DFID's humanitarian programmes every two to three years at most. Much of the more qualitative results measurement at this level is therefore conducted through more informal learning-oriented assessment and evaluation activities, rather than through formalised systems of evaluation for internal and external accounting. Although

DFID commissioned a formal external evaluation of its response to the 1995–98 volcanic disaster in Montserrat (Department for International Development, 1999b), it has largely relied on its own internal lesson-learning capacities in respect of Kosovo, Gujarat and Afghanistan.

CHAD's evaluations are primarily concerned with scrutinising the policies and performance of partner implementing agencies in the context of the ISPs that these agencies have agreed with DFID. The ISPs are prepared every three years or so for the main multilateral institutions that DFID works with, in consultation with the institutions themselves and civil society representatives. They set out how DFID aims to contribute to achieving its poverty reduction objectives in partnership with each of the institutions concerned. DFID's ISPs with humanitarian agencies are more preoccupied with strengthening the accountability of the partner agencies than are the ISPs with the international financial institutions, with relatively detailed work plans specifying the actions to be taken by the agency on the governance and funding side. This concentration of evaluations reflects, again, a concentration on DFID's role as an enabler and funder, rather than as a central, strategic actor in the humanitarian system. The priority for DFID is its capacity- and institution-building and advocacy *vis-à-vis* other humanitarian agencies.

Every year, CHAD scrutinises at least one programme of all major UN agencies and the Red Cross organisations in the context of their ISP, with the focus often on the partner agency's role in a particular emergency.<sup>18</sup> A CHAD evaluation of DFID's ISP with the World Food Programme (WFP), for instance, included an examination of WFP's programme in India. The purpose of these evaluations is principally to inform DFID's dialogue with the agencies concerned, and to inform the core and future funding that DFID will provide to that agency. In theory, the ISPs should pave the way for more DFID emergency aid to be channelled through multilateral channels in the future.

A key question, of course, is whether these evaluations are concerned primarily with reviewing the partner or the partnership (Department for International Development, 2001b: 15). Although ISPs should focus on the joint performance of DFID and the partner agency against the ISP objectives, CHAD evaluations of the ISPs with humanitarian agencies have tended to focus more exclusively on the performance of the partner institution.<sup>19</sup> This reflects, in part, the relatively one-sided nature of the ISP agreements themselves, which concentrate on the policies and activities of the partner organisations rather than on DFID's role. However, an evaluation of DFID's ISP with the International Committee of the Red Cross places relatively more emphasis on reviewing DFID's role in the partnership. The ISP paradigm should demand of DFID greater managerial and strategic accountability for developing and maintaining effective partnerships with key humanitarian and development agencies.

A recent DAC report notes how the partnership approach is replacing the traditional 'command and control' model of accountability, according to which managers are responsible

for achieving specific results. Under the new paradigm of shared accountability:

*managers might be held accountable for working with partners to achieve higher-order results, for learning from failures, and for continually using performance information in their decision-making processes. In other words, they would be held accountable for forming partnerships, for learning and for managing-for-results, rather than for achieving specific results, especially those out of their control* (Development Assistance Committee, 2000a: 17).

### 5.3 DFID's managerial and financial performance at corporate level

Although managerial and financial accountability each have their own distinct monitoring and reporting procedures and channels, they have become more closely linked as: (i) managerial accountability in the public sector has come to incorporate more detailed reporting and assessment of the economy, efficiency and effectiveness of resource deployment in pursuance of policy objectives, and (ii) as financial accountability has been broadened from strict fiscal compliance to incorporate issues of efficiency and effectiveness (Glynn and Murphy, 1996). The key external domestic bodies formally concerned with DFID's managerial performance at the corporate level therefore include:

- the Treasury, to which DFID reports on its PSA and SDA (quarterly, and via the government's comprehensive spending reviews), and to which DFID is accountable for expenditure against any draw on central government reserves to fund emergency responses to major humanitarian crises;
- parliamentary select committees, notably the IDC and PAC; and
- the NAO.

DFID's formal external reporting centres on its quarterly PSA/SDA reports to the Treasury, and its Annual Departmental Report (ADR), which represents DFID's formal annual account to parliament of its policies and performance, expenditure and spending plans.

DFID's ADR is usually subject to an inquiry by the IDC. In its 1998 report on DFID's 1997/98 ADR, the IDC complained that, while the Secretary of State had stated that adequate provision had been made for both foreseeable relief needs and unforeseeable emergencies:

*We are unable to ascertain from the information provided whether this is in fact the case. The lack of explanation of the cash plans table in the Departmental Report makes it impossible for us to evaluate DFID's emergency bilateral expenditure. We recommend that future Departmental Reports include a more detailed account of emergency expenditure, including explanations of significant fluctuations in emergency bilateral expenditure* (International Development Committee, 1998c: paragraph 29).

Although the IDC has commended DFID on the quality and detail of its reporting in subsequent ADRs, a major

weakness of DFID's external corporate PSA/SDA and ADR reporting is (a) the lack of objective, independent review in DFID's own reporting of its activities and performance; and (b) the lack of detail provided on any one area of DFID's work, particularly when in reporting results as opposed to inputs (expenditure) and activities.<sup>20</sup> This is acknowledged in a paper on performance management by DFID's evaluation department, where it notes that DFID 'will need to remind HMT [the Treasury] and others such as NAO and International Development Committee that the PSA can attribute progress only in general terms rather than in fine detail; and that genuinely collaborative working necessarily implies shared attribution and accountability' (Department for International Development, 2001b: 9).

Although the ADR is intended to place more emphasis on DFID's achievements and impacts, problems of time-scale and attribution will mean that process indicators and objectives are likely to remain central in DFID's annual corporate performance reporting. And, as noted above, DFID's PSA/SDA reporting on humanitarian assistance will remain focused on process for as long as there is no relevant PSA target that sets any higher-level strategic objectives in this area.

The NAO and PAC investigations of DFID's activities provide a very important counter to DFID's own PSA/SDA and ADR reporting, because they provide independent external scrutiny and review to complement DFID's own assessments and reports, and their inquiries and reports go into the fine detail of policy and practice in particular areas. However, the general emphasis on DFID's corporate financial and managerial accountability (as opposed to strategic accountability) is reinforced by NAO and PAC scrutiny since these bodies are very much concerned with value-for-money considerations and the ways that policies and programmes are implemented, rather than the policies themselves. The PAC and NAO, for instance, would not be directly concerned with whether DFID's humanitarian assistance policies are in line with its 'Principles for a New Humanitarianism' (see Department for International Development, 2000: 7).

Moreover, since the NAO and PAC are responsible for auditing all areas of government, and emergency aid accounts for only around 10% of the UK's overall aid programme, they are not likely to scrutinise DFID's humanitarian programme frequently. In the last ten years, the NAO has published two reports concerned with humanitarian assistance: in 1993, on the Overseas Development Administration's emergency aid programme, and in 2000, on DFID's response to the Kosovo crisis (National Audit Office, 1993; and National Audit Office, 2000). An NAO report of 2002 on performance management in DFID does not include specific discussion or scrutiny of humanitarian assistance (National Audit Office, 2002).

#### 5.4 Informal 'horizontal' accountability for performance

Informal 'horizontal' accountability to other institutional actors in the international humanitarian system supplements

formal domestic reporting and scrutiny of DFID's corporate performance.

In wider development policy, the OECD's Development Assistance Committee (DAC) is a significant driver in DFID's overall accountability cycle, particularly through the periodic DAC peer reviews.<sup>21</sup> Yet the role of the DAC in direct scrutiny of DFID's humanitarian aid programme is limited: there is no working group on humanitarian assistance, and a DAC peer review of DFID includes only a brief and largely descriptive reference to DFID's emergency aid programme (Development Assistance Committee, 2001: 1–39). The DAC is indirectly significant, however, in supporting and informing DFID's own monitoring and evaluations and methodologies through the work of its Working Party on Aid Evaluation (see Development Assistance Committee, 1999).

Horizontal accountability to partner implementing agencies through DFID's ISPs should provide an additional accountability mechanism. However, like the evaluations of these agreements discussed above, ISPs remain relatively one-sided, with the 'mutual' ISP objectives and obligations relating almost exclusively to the objectives and obligations of the partner organisation concerned. DFID's obligations under existing ISPs are restricted primarily to DFID's funding commitments and a limited amount of 'in-kind' contributions in the form of capacity-building and technical cooperation. Therefore, what accountability the ISPs do impose on DFID remains focused narrowly on its role and responsibilities as an enabling and funding institution. Meanwhile, since the new Partnership Programme Agreements (PPAs) negotiated between DFID and NGOs do not yet establish any new or significant mutual obligations in the area of emergency assistance, the still largely project-by-project contracts with humanitarian NGOs do not extend DFID's obligations in this area beyond the timely and efficient provision of funding for individual projects.

Outside of the ISP and other contractual relations with implementing partners, CHAD and the regional desks consult informally with special interest actors, including NGOs, academics and the UN and Red Cross humanitarian agencies. CHAD has periodic meetings with agencies and other stakeholders with specific interests, such as refugee interest organisations, or NGOs working in a particular emergency. However, because these organisations are usually directly involved in applying for DFID funds or implementing emergency aid projects funded by DFID, immediate operational, funding and management concerns tend to overshadow discussion of wider strategic policy issues.<sup>22</sup>

## 6. Conclusions

Accountability at the political/strategic level depends on a clear definition of strategic policy objectives, and for these objectives to be linked clearly and explicitly to policy and programming systems and formal monitoring and accounting structures at all levels. While the British government set out some central goals and objectives for humanitarian assistance in its 1997 White Paper and 2000

policy statement on conflict reduction and humanitarian assistance, it is not clear how individual departments within DFID, or DFID as a whole, are setting targets, designing policies and monitoring and accounting for their performance against these general objectives. The government has stated its clear intention to 'join up' its humanitarian, diplomatic and military policies to ensure more effective and comprehensive responses to conflicts and humanitarian emergencies, but the precise parameters of individual ministers' responsibilities remain blurred. The International Development Act 2002 does not define humanitarian assistance or establish precise obligations in this area, nor has DFID or any other government department developed a PSA relating to humanitarian policy. Both the 1997 White Paper and DFID's 2000 policy statement confirm the government's commitment to core humanitarian principles and set out a number of central objectives for DFID's humanitarian programme, such as a commitment to improve disaster preparedness and prevention. But these are not linked directly to clear and measurable policy pledges relating to DFID's own performance and activities and reporting commitments at different levels of policy planning and implementation, such as regarding the decisions that affect the size of emergency funds disbursed to particular emergencies. DFID has focused its formal commitments much more on its role as an enabler and supporter of other actors in the humanitarian system than on its own position as a key strategic actor in international systems of humanitarian response.

It is arguably justified for DFID's principal commitments in this area to be limited to the rather functional processes of disbursing humanitarian aid and delivering relief. After all, DFID is, first and foremost, a donor, not an implementing agency. But this belies the fact that deciding where and how to provide humanitarian assistance is a highly political process (Macrae and Leader, 2000: 35). Decisions affecting the overall allocation of aid and the processes for disbursing it are essentially political, for which the minister, department and government should be accountable at the strategic level. Moreover, the emphasis on DFID as a neutral donor rather than as a strategic actor at the corporate level does not sit well with DFID's explicit move towards more politically 'astute' humanitarian assistance, as set out in its 2000 policy statement on conflict reduction and humanitarian assistance. Nor does it fit well with the government's wider commitment to joined-up government and the closer coordination of humanitarian, political and military policies in its responses to major humanitarian and political emergencies, such as Afghanistan.

The absence of very clear policy pledges backed up by robust systems of monitoring and reporting in this area reflects, in part, a tension between accountability and effectiveness and between different facets of accountability at the strategic level. The alignment of humanitarian aid with foreign and security policies is articulated by the government in terms of achieving more *effective* responses to complex humanitarian and political emergencies, such as in Kosovo, East Timor, Sierra Leone and Afghanistan. The government's strategic accountability for its policies in these situations is therefore couched generally in terms of

the overall effectiveness of its diplomatic, military and humanitarian strategies in response to specific emergencies. But this raises the problem of how to measure effectiveness at this level and against what criteria, since the effectiveness of humanitarian policies cannot be assessed against the same criteria as political and military policies. The government could succeed in its overarching aim of securing and sustaining the peace of the global community, but this does not say anything directly or specifically about its humanitarian policies and their impact.

Paradoxically, it is the concern to improve the strategic effectiveness and accountability of its humanitarian assistance programme that partly largely explains why the Secretary of State has resisted any straightjacket of high-level policy commitments that might require DFID to respond to humanitarian emergencies in an automatic fashion. It also explains why DFID has moved away from being a disengaged and neutral donor in the international humanitarian system to adopt politically astute assistance policies and a hands-on operational capacity. DFID cannot ensure that its humanitarian assistance is effective, and therefore cannot be fully accountable for the impact of its humanitarian aid (whether in declaratory or responsibility terms) unless it can assess the appropriate levels and modalities of assistance required in specific emergency situations, and ensure that its aid inputs will not fuel conflict.

The challenges to accountability in this area are considerable, due to the complexity and fast-changing nature of the humanitarian emergencies concerned, the difficulty of attributing the impact of assistance to any one donor or humanitarian agency, and the absence of clear-cut policy objectives or legislation against which to assess the government's humanitarian assistance policies. While the scrutiny activities of the IDC since 1997 represent a considerable advance in overall parliamentary attention to humanitarian assistance, the committee's limited powers in the executive-dominated Westminster system and the relatively meagre research and other resources that it can call upon make these challenges all the more difficult to overcome. Over the past five years, the committee has focused on individual, high-profile emergencies, mounting its inquiries usually very soon after the onset of the emergency. This type of inquiry enables relatively detailed consideration of general operational challenges in the midst of the crisis, but it does not easily enable the committee to take a broader look at DFID's higher-level policies and overall performance, or to single out DFID from the wider fray of humanitarian agencies and donors involved. In particular, it makes it very difficult for the committee to draw on independent, qualitative evaluations of donors' and operational agencies' policies and programmes, since these would normally be completed at a later stage. This, in turn, reinforces the committee's reliance on the evidence provided by NGOs and other humanitarian agencies.

The committee's reliance on the evidence of NGOs, in turn, probably reinforces the committee's tendency to concentrate on immediate operational matters. The tendency of the IDC to concentrate on the overall humanitarian response and immediate operational matters is almost

certainly reinforced by the reliance that it (inevitably) places on the evidence provided by NGOs. While NGOs have invested considerable resources in strengthening their accountability to the beneficiaries of humanitarian assistance, this has not been matched with any comparable attention to the important role that they play in parliamentary and other 'upward' accountability mechanisms relating to DFID, the UK government or other donors. NGOs have no formal responsibility and often lack the capacity to provide the quality and/or type of information that would be required for reliable and systematic scrutiny of DFID's policies, and they are in any case 'supply-side' actors in the international humanitarian system, usually with direct contractual commitments to DFID.

The comparative weakness of political/strategic accountability means that managerial and financial accountability mechanisms tend to dominate. The inquiries of the PAC supported by the NAO are the one area where parliament does have significant research resources and can mount rigorous and systematic investigations into DFID and other government departments' policy and practice. But the PAC and NAO are concerned with process and activities rather than policy – they are primarily concerned with the ways that policies and programmes are implemented and value for money, rather than with the policies themselves. Meanwhile, DFID's own accounting mechanisms are influenced by wider pressures in the UK public sector to make government departments more accountable for the effective and efficient deployment of public resources. Partly for this reason, DFID's accounting in this area is weighted heavily in favour of accounting for process rather than for policy and results. Thus, while DFID has not yet formulated a PSA target for humanitarian assistance, it has committed itself to an SDA target phrased for *timely, effective and co-ordinated* emergency assistance. And because DFID is reliant on self-assessment by implementing partner agencies, it is investing considerable effort and resources into strengthening their accountability and performance. As a consequence, and as reflected in its 2000 policy statement on conflict and humanitarian assistance, DFID has so far restricted its formal accountability largely to activities to support and enable its partners in the international humanitarian system (Department for International Development, 2000).

It is important to note the distinction between assessment and evaluation undertaken in order to improve policy, practice and overall effectiveness, and assessment and evaluation for the purposes of internal or external accounting. DFID and the Secretary of State have been most concerned to improve the effectiveness of the UK's humanitarian assistance. This is reflected in the fact that informal learning-oriented assessment and evaluation have taken precedence over formalised monitoring, evaluating and reporting for internal and external accounting. It is also important to note that more monitoring, evaluating and reporting does not necessarily lead to greater accountability, since everything depends on what is monitored, evaluated and reported, how and by whom. There is always a risk that strengthening one form of accountability might overshadow or undermine another. The main challenges facing DFID, the IDC, parliament and other actors concerned with

DFID's and the UK government's accountability in humanitarian assistance include the overall lack of clarity regarding individual ministers' and departments' legal and political responsibilities in this area, the weak linkages between higher-level strategic policy objectives and mechanisms of managerial and financial accountability at various levels within DFID and across government (including formal processes of monitoring and accounting for performance and results), and the various factors that constrain the external scrutiny activities of the IDC and other stakeholders, including humanitarian agencies.

## Endnotes

<sup>1</sup> These five categories of accountability are based on a typology outlined in Glynn and Murphy, 1996.

<sup>2</sup> A recommendation to the House of Commons Commission to fund additional specialist research staff in the central Committee Office was approved by the House in May 2002. See Hansard House of Commons Debates 14 May 2002, Col 648–731.

<sup>3</sup> One such example is the 1999–2000 Quadripartite Committee on Strategic Export Controls, involving the International Development, Foreign Affairs, Defence and Trade and Industry committees.

<sup>4</sup> The IDC took evidence from both the Secretary of State for International Development and the Foreign Secretary in its 1998 follow-up inquiry into the UK's policies in Montserrat (see House of Commons, 1998a). During 1999/2000 and 2000/01, the IDC took evidence from officials of a number of different government departments in the context of the Quadripartite Committee on Strategic Arms Controls, including the MoD, FCO, Department of Trade and Industry, Home Office and the Ministry of Agriculture, Fisheries and Food.

<sup>5</sup> Speech by Foreign Secretary Jack Straw at the Lord Mayor's Banquet, Mansion House, London, 10 April 2002. See also chapter 2 of the 1999 Government White Paper *Modernising Government* (Her Majesty's Government, 1999).

<sup>6</sup> Currently Crown Agents.

<sup>7</sup> For an explanation of the contingency reserve, see House of Commons, 1999c, paragraphs 47–50.

<sup>8</sup> The Joint DFID, FCO and MoD PSA Target commits those departments and their ministers to achieving 'Improved effectiveness of the UK contribution to conflict prevention and management as demonstrated by a reduction in the number of people whose lives are affected by violent conflict and a reduction in potential sources of future conflict, where the UK can make a significant contribution' (Department for International Development, 2001a).

<sup>9</sup> In keeping with the government's 1997 White Paper on poverty reduction, the SDA places both emergency assistance and conflict reduction work under DFID's wider efforts to promote sustainable development and reduce poverty.

<sup>10</sup> The committee can only travel outside Europe twice a year.

<sup>11</sup> Interview, March 2002.

<sup>12</sup> Interview, March 2002.

<sup>13</sup> In its 1999 inquiry into conflict prevention and post-conflict reconstruction – the only wide-ranging IDC inquiry that has included attention to humanitarian assistance

– the committee did not extend its examination of DFID's humanitarian policies beyond the specific concerns raised by NGOs about the UK government's policies in Sierra Leone.

<sup>14</sup> Interview, March 2002.

<sup>15</sup> Interview, March 2002.

<sup>16</sup> Results-based management might be more effective with responses to natural disasters than responses to conflict since, in natural disasters, specific inputs may be more easily linked to specific results, and there are more likely to be local institutions/interlocutors to which donors and other actors will be accountable for results.

<sup>17</sup> Interview, March 2002.

<sup>18</sup> Although there would probably be no objection in principle to doing so, DFID does not have the capacity and resources to commission similar evaluations of NGOs.

<sup>19</sup> An evaluation of the ISP with the International Committee of the Red Cross lays relatively more emphasis on evaluating DFID's role in the partnership.

<sup>20</sup> See, for instance, House of Commons, 2000c, paragraph 2.

<sup>21</sup> The DAC conducts periodic reviews of individual donors every four years or so. The peer review is prepared by representatives of the DAC Secretariat working with officials from two DAC members, who are designated as examiners.

<sup>22</sup> Interviews with NGO representatives and DFID officials, February and March 2002.

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