Tsunagu

Final Report

External Evaluation:
Accountability to Affected
Populations (AAP) in Start Fund
Processes and Start Fund Projects

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Disclaimer

The views expressed in the evaluation do not necessarily represent the views of the Start Fund or the Start Network.

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Acronyms

AAP	Accountability to affected populations
CFM	Complaints and feedback mechanism
FGD	Focus group discussion
INGO	International non-governmental organisation
KII	Key informant interview
LNNGO	Local and national non-governmental organisation
NGO	Non-governmental organisation
PDM	Post-distribution monitoring

Executive Summary

This independent evaluation assesses how Start Network members integrate accountability to affected populations' (AAP) principles and practices into Start Fund projects, which are 45 or 60 days in duration. It examines how the Start Fund's timeframes — which emphasize early and rapid humanitarian action — affect AAP work, and whether local and national NGOs (LNNGOs) differ from international organisations (INGOs) in their approaches to accountability. It also seeks to identify other variables that may affect AAP, among them differing contexts and whether the project was classified as response or anticipation. Opportunities to enhance AAP through the Start Network Hub model are also explored.

To probe these questions, the evaluators developed an "Accountability Metric" that draws on project proposals and reports to score member agency projects' adherence to the Start Fund's AAP guidance. They also conducted a desk review, key informant interviews (KIIs) with a range of stakeholders, participatory data collection activities with communities in three countries, and a review of Start Fund processes and procedures.

In assessing compliance with Start Fund accountability standards, no one characteristic of a project or organisation emerged as a predictor of success. Only modest differences were observed between anticipation and response projects, context and crisis type did not predict a member's performance, and LNNGOs and INGOs showed similar levels of achievement. However, this evaluation component relied exclusively on what could be measured through Start Fund documentation. The desk review, KIIs, and participatory data collection activities — which widened the evaluation's lens beyond project documentation - indicated that member agencies engaged in good practices that were not captured in their communication with the Start Fund. Notably, an organisation's approach to community engagement — for example, concerted efforts to train frontline staff in the soft skills required to communicate effectively and empathetically, or an investment in regular two-way communication with affected people — emerged as a key factor in whether communities viewed an organisation as accountable to them. Timely, tailored two-way communication is an essential building block of trust and meaningful participation. For this reason, and because Start Fund reporting does not require member agencies to detail these activities, further research into this aspect of accountability — and how funders can encourage it — could be fruitful for the Start Fund.

The evaluation showed that the short timeframe of Start Fund-supported projects did somewhat hamper efforts toward AAP, and particularly participation, for many members. KIIs said they struggled to use, for example, a participatory design process given the requirement to begin implementation within seven days. And while the

desk review and community-level data collection suggest that many communities prefer face-to-face interaction, some KIIs said they had less direct interaction with people during Start Fund-supported projects than in others due to project time limitations. The necessity of predetermining interventions can also leave little room for affected populations to influence programming, and indeed most participation activities among members were consultations limited to a select number of community representatives. Time constraints also prevented members from following up with communities beyond post-distribution monitoring — although during data collection with communities, participants expressed satisfaction with the opportunity to share their perspectives, which in turn yielded rich insights for organisations.

One hundred percent of evaluated projects had a complaints and feedback mechanism (CFM) with multiple channels. At the same time, not all members share an understanding of what constitutes a complaint or a piece of feedback, leading some projects to report no complaints and others to report many complaints when most were questions about beneficiary selection. KIIs also noted a general stigma around reporting to donors that their project received a large number of complaints. Several KIIs described engaging in informal exchanges, such as at the distribution site or on the phone with community members, but not all considered those interactions to be part of the CFM. Often, these exchanges were described as efforts to resolve an individual problem — critical accountability work that may not be reflected in reporting. Neither formal nor informal information-sharing and communication activities were captured by the Accountability Metric because this pillar of accountability is not discussed in Start Fund reporting forms, although it figures prominently in the Fund's AAP guidance. Start Network members may be consulted on how they could report on these essential accountability activities without increasing their administrative burden.

A significant gap in nearly all projects, and across AAP-related activities, is the inclusion of population sub-groups, such as older people and people with disabilities, when seeking input at key moments in the project cycle and selecting communication channels. Members mentioned efforts to include and represent women more than other sub-groups, though there was a limited understanding of intra-group differences and the implications for AAP.

This report recommends that the Start Fund examine how it can improve its operations to better integrate AAP principles, including how project duration and funding limitations impact AAP commitments. It suggests moving away from focusing on the type of organisation to look at other indicators of accountability, and to promote a culture of learning balanced with — rather than overshadowed by — compliance. The Start Fund is encouraged to revise its AAP guidance and proposal requirements to prioritise community involvement throughout the project cycle, with

a focus on the participation of population sub-groups. On a larger scale, the Start Fund could play a convening role, bringing humanitarian funders together to consider how collective efforts at the funding level can enable agencies to engage communities and other local stakeholders in decision-making. This could be an opportunity to explore radical adaptations to how funding is provided and how AAP is strengthened.

Recommendations

Internal reflection on how the Start Fund model can enable the implementation of AAP principles.

- **Considering the barriers to AAP created by the short duration of projects and specific milestones** (e.g., start within seven days), how can the Start Fund remain grounded in its mission and values, but at the same time be adaptable?
- Moving beyond a focus on the type of organisation, **what are the implementation characteristics that empower communities and align humanitarian assistance with their preferences?** How can these characteristics be consistently integrated into project implementation?
- To what degree **do funding thresholds** associated with the Start Network's tiered due diligence framework **impact members' ability to develop the systems and capacities required to meet AAP standards** and capture learning to inform response quality? Does this disproportionately affect members with more limited funding thresholds, particularly LLNGOs?
- **Develop a logic model for AAP in Start Fund projects** to articulate the inputs needed to advance AAP and to track progress in achieving outcomes.

Promote a culture of learning

- **Share results of this evaluation with Start Network members** and solicit input as to what the Start Fund could do differently. **Bring other humanitarian funders together to discuss these findings** and identify practical actions that can encourage accountability to affected populations.
- **Identify resources and tools that members can access** to improve accountability approaches. This could include examples of communication channel assessments, needs assessment question sets about language and literacy, or participatory methods in short-term projects.
- Consider how to **share feedback from project selection committees**, to promote learning and capacity building among members (**particularly within Start Network Hubs** and for newer members), and their long-term partners.
- **Revise Learning Exchange guidance** to include thematic exchanges focused on AAP and adapt questions to focus on identifying solutions to the most challenging aspects of AAP.

Start Fund Processes:

- **Update AAP Guidance and other Start Fund processes** considering the key findings of this Start Fund evaluation and the results of internal reflection among members. Specific recommendations for proposals and report formats are outlined in the detailed findings on Start Fund processes.
- **Explore whether proposals could be funded without a list of pre-defined activities.** Funding could be provided based on a set of outcomes or determined based on a partner's assessment of the type and scale of needs vis-à-vis their capacity. Sectors of intervention could be proposed without a detailed list. This change would allow activities and approaches to be defined in coordination with the community after funding is received.
- **Consider how to create incentives for members to invest more explicitly in meaningful AAP activities and staffing**, for instance through a designated budget line in proposals or reports, or by issuing guidance on which AAP-related costs can be reported as project rather than support costs.

Start Network Hub Model Opportunities

- **Identify synergies with locally led initiatives in collaboration with Start Network Hubs** to develop more contextual and operational definitions of AAP that take into account the local perspective. The Hubs' geographic presence creates unique conditions for expedited connections and collaboration with new networks.
- Where relevant, **ground learning actions at the Start Network Hub level, while promoting cross-Hub learning**. By better understanding how completed and ongoing projects can inform one another, Hub members are well-positioned to apply these insights to questions such as community preferences for CFMs and practical approaches to ensure CFM accessibility for population sub-groups.

Introduction

The Start Fund is one of the financing mechanisms within the Start Network that supports small to medium scale and underfunded crises through its network of 80+ local, national, and international non-governmental organisations (NGOs). The Start Network Theory of Change (ToC) includes Accountability to Affected Populations (AAP) as part of its systems-level outcomes and highlights locally led humanitarian action as a key pathway to accountability. f. The Start Fund ToC reinforces the centrality of ensuring humanitarian action is informed by affected populations and that people's feedback contributes to quality humanitarian programming.

This independent, external evaluation assessed the extent to which Start Network members incorporated accountability principles and good practices into Start Fund-supported programming, specifically in light of the rapid timeframes of 72 hours between alert-raising and project selection, and 45 days or 60 days for project implementation (*Annex 1 lists the evaluation questions*). In addition to evaluating the overall level of accountability, the differences were assessed between AAP approaches in Start Fund humanitarian response projects and anticipation projects. Finally, the evaluation explored the differences between LNNGOs and INGOs in their approaches to accountability and theoretical opportunities to enhance AAP through the Start Network Hub model.

A Start Fund Guidance Note on Accountability and Safeguarding was developed as a result of research commissioned by the Start Fund in 2017, and defines AAP as:

"the process of using power responsibly: taking account of, and being held accountable by, different stakeholders, primarily those who are affected by the exercise of such power."

This evaluation focused on three elements of accountability as highlighted in the Start Fund guidance:

- Participation
- Information sharing and communication
- Complaints and feedback mechanisms

Methodology

Given the range of humanitarian responses and diversity of affected populations, the evaluation used a realist approach. A realist perspective acknowledges that there is no "one size fits all" way of implementing AAP principles, and that approaches should vary between response contexts and at inter- and intra-community levels.

Qualitative and quantitative methods (*Figure 1*) were used to collect data. Country-level KII transcripts were coded using Dedoose, and global-level KIIs were analyzed in

a structured note-taking matrix. Quantitative data was analyzed using Microsoft Excel. For the findings, information was triangulated from KIIs, participatory data collection with communities, the review of project documents, the development of an accountability metric, and a desk review of Start Fund processes and procedures.

Fifty-five projects were selected from those implemented and completed between July 2022 and October 2023 (see Volume II for the project list). This included all LNNGO-implemented projects during this period (excluding one organisation). The complete list of INGO projects funded during this period was stratified by type (response or anticipation) and projects were then randomly selected for inclusion in the evaluation.

Proposals and reports were reviewed for each project, and the content of each document was coded to produce an Accountability Metric (see Volume II for the methodology). A subset of 14 projects (seven LNNGOs and seven INGOs), representing a range of characteristics (low versus high score on the Accountability Metric; anticipation versus response projects;

20 KIIs (7 LNNGOs, 7 INGOs, 2 Hub members, 4 global level Start Fund Staff)

Participatory data collection in 3 countries (Cameroon, Guatemala, Nigeria)

55 project documents reviewed (proposal and report) for the accountability metric

Desk review of Start Fund processes and procedures

Figure 1. Evaluation Methodology

responses to natural and human-induced hazards) were selected for KIIs, with project-level staff that had knowledge of implementation (Volume II for the KII guides). Three of these projects were selected for focus group discussions (FGDs) and household interviews with members of affected communities (Volume II for the data collection methodology). Consent was obtained from all KIIs, FGD participants, and household interviews. All data collected is confidential and has been anonymized for inclusion in this report.

The desk review of Start Fund processes included 23 documents. Four Start Fund staff with knowledge of Start Fund programming and accountability practices were interviewed, and two leading Start Network Hub members with knowledge of the Hub model shared insights about AAP and opportunities for integrating relevant practices into the Hubs.

Identity statement

The consulting team is based in the global north with experience as implementers and funders in humanitarian programming. Individual and group reflection were used to identify our biases and to ensure the findings and recommendations were grounded in the evaluation's data.

Limitations

Accountability Metric: The Metric is calculated based on the content included in reports, and its indicators are reliant on the degree to which AAP can be measured via Start Fund reports. Therefore, the scores could be influenced by the quality of writing, and the scope of Start Fund's project documents. The calculation methodology reduced this limitation's effect: Points were assigned according to whether content met the relevant AAP criteria and not based on the quality of information. The limitations are fully described in the methodology (see Volume II).

Community-level data collection: Six FGDs and 11 household interviews were conducted across Cameroon, Nigeria, and Guatemala. These countries were selected as they represented different response contexts and had recently completed project implementation. Initially, two INGO projects and two LNNGO projects were selected. However, data collection with a LNNGO in the Gaza Strip was cancelled due to the crisis that began in October. At the request of the second LNNGO, the project community was changed to a project community where implementation was led by an INGO sub-grantee. The focus groups were gender-separate and the household interviews targeted older people, people with disabilities, or women who were unable to participate in the FGDs. Participation was voluntary, and consent was sought from all participants.

Each NGO engaged external facilitators to reduce the level of social desirability bias. The facilitators participated in a training that included the basics of facilitation, the participatory methodology, and strategies to sensitively discuss traumatic events. Project staff from each organisation supported the facilitators to liaise with community leaders to organize the data collection; therefore, the feedback from communities could have been influenced by a perceived correlation between providing positive feedback and the potential for receiving future assistance. In addition, the participants for the community data collection should have been randomly selected by each NGO. However, this was not possible due to the short timeframe for data collection and the availability of potential participants.

Start Network Hub Opportunities: Only two interviews with members of the Hubs were possible due to the limited number of KIIs and an ongoing evaluation focused specifically on the Start Network Hub model.

Concepts such as trust and dignity, which are central to AAP, were challenging to fully explore via community-level data collection due to the limited time to train the facilitators on how to ask these questions as well as the presence of the INGO staff during the data collection.

Findings

For the Start Fund, accountability is a guiding principle that is well-integrated into the Fund's systems and processes. Building on this foundation, a review of project proposals and reports provided useful insights as to how the three core elements of accountability (participation, information sharing and communication, and CFMs) are operationalized in response and anticipation programming.

The commitment to being accountable to affected populations is clearly embedded in the Start Network and Start Fund ToCs (*Annex 2*). While AAP is mentioned throughout the TOCs, the activities or inputs required to ensure accountability to affected populations often only refer to locally led humanitarian action. However, this evaluation found that local leadership is one aspect of AAP, and there are other foundational actions required to ensure AAP across all projects. **Updating the Start Fund ToC or creating a separate logic model for AAP could help to clarify the inputs needed to advance AAP and track progress in achieving outcomes.**

Accountability to affected populations in Start Fund projects

Start Network members had varying levels of achievement implementing key aspects of the Start Fund AAP guidance. The Accountability Metric disaggregates elements of accountability and reveals the degree to which the Start Fund's requirements and principles are applied in each project. The distribution of projects indicates that members had varying levels of achievement implementing the key elements of the Start Fund AAP guidance. While progress has been made since the last evaluation focused on accountability in 2017, particularly related to systematising complaints and feedback mechanisms, participation by the affected population was less frequently reported. In particular, key population sub-groups were not systematically included during the project cycle.

To visualize the degree to which projects implemented the key AAP guidance, the sub-scores for participation and the use of CFMs were plotted for each project (*Figure 2*). The black line indicates the mean score (7.3 for participation and 11.3 for the CFM system) which is used as an indicative cutoff for achievement. The plot area was divided into four quadrants with a categorization of high or low for each category. Each project can be assessed against where it falls in relation to the mean and maximum for each category (18 for CFM system and use, and 24 for participation), making it easier to identify opportunities for learning.

Figure 2. Accountability Metric sub-scores
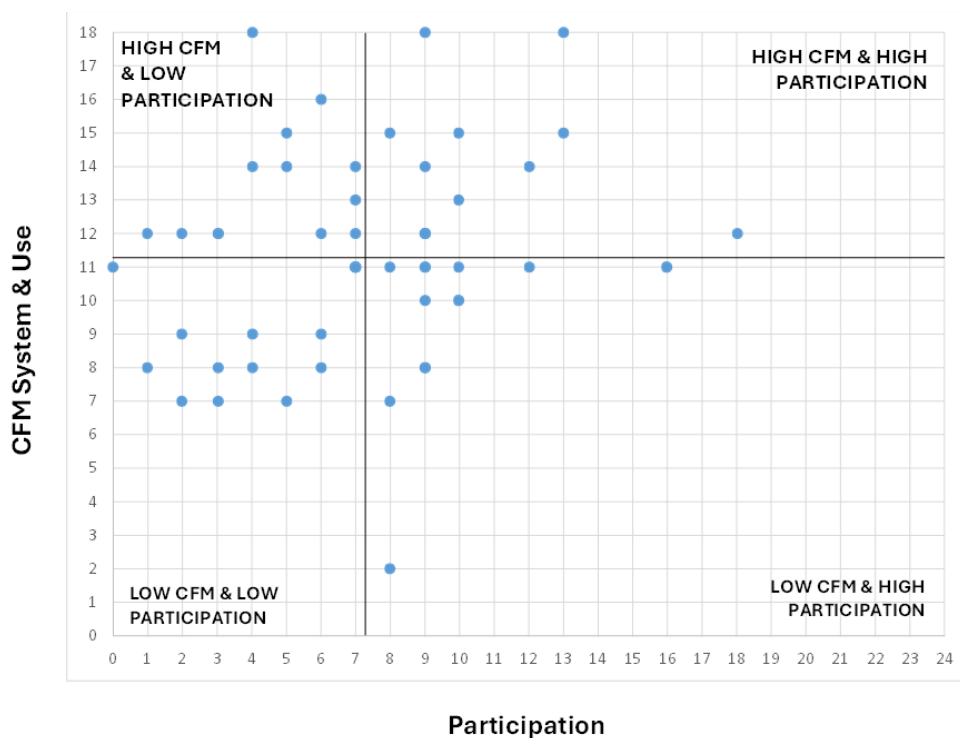
The Metric scores largely aligned with the findings from the KIIs. Some exceptions were noted: Several KIIs provided information that diverged from the project report, in most cases related to the number and type of channels used in CFMs. In other cases, members had not completed the report section on community participation, and KIIs filled in the missing information. The Metric was useful in highlighting how an "accountability lens" can be applied to reading proposals and reports, specifically considering the different elements individually and then as part of a whole within the project context. While there are limitations in reading reports, they are often the primary interface between funders and grantees, indicating the importance of requesting the most informative data points and using reports as a learning opportunity rather than a compliance exercise.

Complaints and feedback mechanisms

There has been significant progress with the use of formal complaints and feedback systems since the previous evaluation focused on accountability in 2017 (*Table 1*).

Table 1. Complaints and feedback system indicators

Indicator	2017	2023
Report use of formal complaints and feedback systems	55%	100% (n=55)
Report use of feedback/complaints to adapt program	18%	59% (n=20/34 projects which received complaints)
Language considered in the design of CFM	-	18% (n=10)
Accessibility for people with disabilities integrated into the CFM	-	24% (n=13)

The adoption of CFMs is firmly established in organisational policies, yet findings from KIIs and reviews of proposals and reports indicate these systems are often developed based on organisational procedures and not tailored to the response context. In addition, **proposals frequently contain generic content and rarely reference the use of effective CFM systems informed by past experiences or specific knowledge of the communities.** This represents an **opportunity to utilize the Start Network Hub model as a repository for learning from previous responses on community preferences for CFMs and practical approaches to make CFMs accessible for population sub-groups.**

Of the proposals reviewed:

- Eighteen percent (n=10) of projects mentioned local languages as a consideration in developing their CFM system. As not all projects are implemented in contexts characterized by high levels of linguistic diversity, a sub-set of 24 projects where language diversity is likely were reviewed and the references to language were slightly higher at 21 percent (n=5).
- Twenty-four percent (n=13) of projects mentioned accessibility for people with disabilities when establishing CFMs. Considering that more than 75 percent of the reviewed projects specified that they would include people with disabilities or older people, **there appears to be a disconnect between the processes used to develop CFMs and the level of consultation with key population sub-groups.**

Communication channels

Start Network members reported using an average of four communication channels, and slightly more than half of projects (55 percent, n=30) selected communication channels that aligned with the mix of characteristics outlined in the Start Fund Guidance Note on Accountability:

- Accessible to people who are not literate
- Accessible to people who are not included in the project
- Formal and informal
- Reactive and proactive
- Anonymous
- In-person and remote

Accessibility for people with disabilities was measured separately through the Accountability Metric as there is no single communication channel that is accessible for people with disabilities. For example, while text-based messaging would be accessible (without assistance) for people with different levels of hearing capabilities, they would not be for people who are blind.

The most commonly used communication channels were talking to staff (80 percent, n=44) and phone (76 percent, n=42). Help desks, exit surveys, and text messages were the least-frequently used (*Table 2*).

Table 2. CFM Channels

Channel	n	%
Talking to staff	44	80%
Phone*	42	76%
Complaint box	37	67%
Meeting	32	58%
Exit survey	21	38%
Help desk	20	36%
Text	17	31%
Other **	13	24%

* Phones are both dedicated hotlines and staff phone numbers.

**Other includes: email, QR codes, lessons learned workshops, flyers, training evaluations, written letters to the office, committees set up to receive feedback, consultations with community leaders, displaying contact information for local volunteers, and feedback given during field visits.

KIIs reported that communities preferred face-to-face interaction for CFMs, in particular via community-based channels:

*…**the volunteers were much preferred.** And they really believe that when they tell the volunteers, all their complaints will go directly to the organisation.*

KIIs also noted that some communities prefer community-based channels due to cultural norms, and a preference for resolving issues among themselves.

*They [people in communities] are accustomed to tackling all of the grievances in the community…so they **perceive problems to be solved internally and to not share with anyone externa**l.*

The community-level data collection also indicated that people preferred face-to-face interaction, in particular with NGO staff, or directly contacting staff through a phone number. KIIs reported that direct interaction with communities is often less in Start Fund projects, therefore **specific barriers to the use of face-to-face channels should be explored with members.**

Other challenges included the assumption that a sub-group will have uniform communication preferences, despite diversity in their intra-group characteristics, e.g., that all women, regardless of age or location, want to receive information in the same way. However, some members had a nuanced understanding of preferences:

Based on previous surveys the Leading Agency conducted, **female beneficiaries prefer provide their feedbacks during direct meetings with NGOs representatives or through community representatives, rather than complaint box or phone call, whereas in other areas female community members preferred phone over other channels.** *(proposal excerpt)*

Other creative approaches to adapting communication channels for sub-groups were shared, including the use of play to facilitate feedback from children:

In the case of the complaints box - **two formats: a blank sheet of paper, and a scale with emojis of faces** *in which they identify how they have felt about the project, the happy face and the sad face, the indifferent face*

Use of complaints and feedback

Sixty-two percent (n=34) of projects reported receiving feedback or complaints ranging from a minimum of one to a maximum of 300 (Table 3). Start Fund staff follow up with projects that report zero complaints, but there is no formal learning process related to complaints. Of the 34 projects that reported the number of feedback/complaints, the mean was 41 and the median was 10. This indicates a high level of variance in the volume of feedback and complaints that were reported.

Table 3. CFM channels and use

Indicator	All projects (N=55)
Average number of CFM channels	4
Mean: total number of Complaints or Feedback	41
Median: total number of Complaints or Feedback	10
Projects meeting all CFM mix requirements	55% (n=30)
Projects reporting feedback/complaints were received	62% (n=34)
Projects that reported adapting based on feedback/complaints	59% (n=20)

Complaints and feedback fell into four categories:

- Exclusion from beneficiary lists/questions on beneficiary criteria
- Recommendations on distribution processes
- Feedback on quality/appropriateness of assistance
- Expressions of appreciation

Most complaints were related to selection criteria, underscoring the need for agencies to engage in proactive, effective information dissemination and two-way communication throughout the project cycle. At the same time, this type of feedback is likely unavoidable in projects where some people are prioritized for assistance. Feedback and complaints related to distribution processes and quality/appropriateness highlighted needs that could have been anticipated, e.g., home deliveries for people with disabilities, closer locations for cash or voucher redemptions, or variety of underwear sizes included in kits.

There were no common characteristics among projects that received a high or low number of complaints. These included both INGOs and LNNGOs and a range of response types. Fifty-nine percent (n=20) of projects that received complaints or feedback via formal mechanisms reported adapting project interventions based on the input provided. While this is progress since the 2017 evaluation when only 18% of projects reported adaptations, there is an opportunity to consider that all projects — even those where the only questions are on selection criteria — should be adapting in some way. For example, while the selection criteria may not change, there is an opportunity to adapt information sharing approaches to more clearly communicate the criteria and integrate the specific issues that are received via the CFM. Members had varying levels of understanding regarding the difference between feedback and complaints, with KIIs indicating that complaints were perceived as mistakes and might be perceived by others as poor performance. It is important to reduce perceived stigmas around complaints and feedback, particularly because the information is useful for response improvement.

*…promote honest learning experiences. I think even **saying that a mistake is seen as a learning experience**. And that's part of it - changing semantics…*

While feedback and complaints should never be zero, it may be possible to reduce complaints related to distribution processes or the quality of assistance through strategic consultation with a diverse range of affected people as part of project design.

Information sharing and communication

Findings on information sharing are more limited as the content in proposals was often generic and the report format does not include questions on information sharing. **Revising the report format to include a question on information sharing**

practices could increase the visibility of this key aspect of accountability. Progress can be seen on one level, with 100 percent (n=55) of projects reporting that they provided communities with information about the response (an increase from 56 percent in 2017), through multiple channels (an increase from 27 percent in 2017). However, as with CFM channel selection, the channels selected for information sharing were generally driven by practicality versus affected populations' input.

- 16 percent (n=9) of projects mentioned language as a consideration when determining how to share information.
- 7 percent (n=4) mentioned accessibility for people with disabilities.

There were limited details regarding information sharing adaptations for people with disabilities.

The community-level perspective also indicated that information sharing varied among projects, with most people reporting that the distribution date and time was the most common type of information received (*Figure 3, yellow line*). However, in other projects characterized by a high level of information sharing, there was a more detailed understanding of the implementation process (*Figure 3, green line*).

Figure 3. Community Timelines (Women's Groups)

KIIs revealed that one effective approach is to collaborate with partners to incorporate the views of population sub-groups for information sharing and when choosing communication channels for CFMs. For example, one LNNGO engaged a local organisation of people with disabilities to provide support on inclusion of people with disabilities, and another LNNGO partnered with an international NGO that provided expertise on inclusion of older people. A limited number of KIIs mentioned staff training as a part of information sharing and communication. These trainings included skills such as listening and empathy. As these soft skills are an important part of communicating respect and facilitating empowerment, this is an opportunity for the **Start Fund to identify relevant training resources from the existing suite of materials already developed by AAP experts.**

Participation

Participation levels varied according to the stage of the project cycle. Members reported participation by the affected population most frequently in the needs assessment, implementation, and project review stages. Community participation was cited less frequently as a part of design and adaptation (*Figure 4*).

Figure 4. Participation during the project cycle
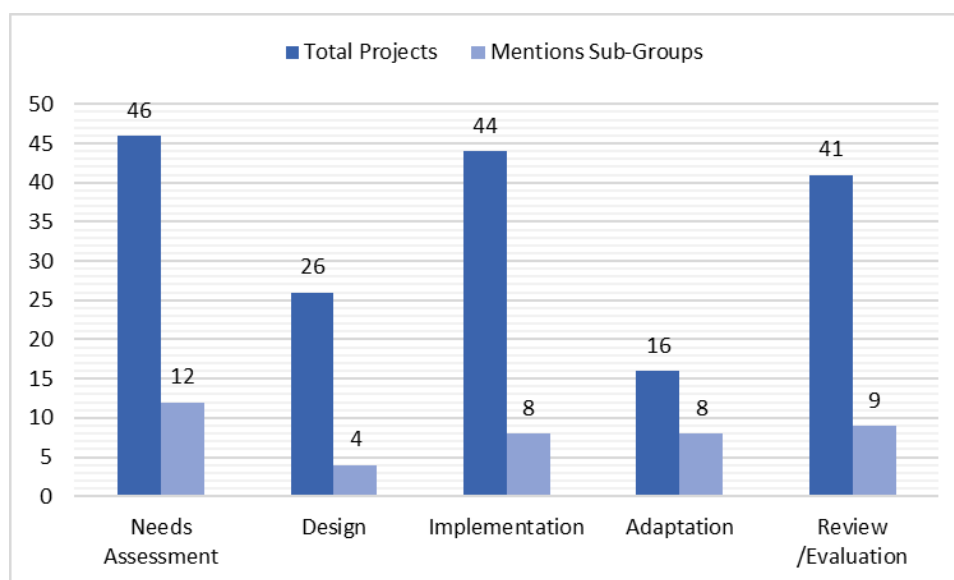
The types of community participation reported by members are listed below *(Table 4).*

Table 4. Types of participation

Project Cycle Stage	Examples of Participation
Needs Assessment	• Consultation with leaders or committees • Household surveys (often used to collect demographic information to inform beneficiary selection)
Design	• Consultation with community leaders, committees, local authorities, or affected populations
Implementation	• Coordination with leader or committee to select aid recipients, organize distribution logistics • Sharing information on assistance
Adaptation*	• Using feedback from affected people on the practicalities of distributions or quality issues
Review/Evaluation	• Post-distribution monitoring (PDM) • Review workshops with stakeholders

* In some cases, the example provided by members under the "Participation" section of the report was different than the example of adaptation provided under the "Complaints and Feedback Mechanism" section.

Members' descriptions of participation in the design phase were usually more generic than those of the needs assessment, and in fact the design process was often noted to be the same as the needs assessment. The design phase's lower level of participation, and the practice of combining the design phase with the needs assessment, could be correlated with the Start Fund's objective to raise alerts as soon as possible so that early and rapid funding can address the most critical needs. In addition, the requirement to begin delivery within seven days of raising the alert could contribute to less consultation during the design process. The majority of Start Fund projects included in this evaluation relied on distributions (cash, voucher, or in-kind) that require significant lead time for logistics. In addition, these timelines can reduce the time available for review and evaluation at the end of the project.

Although it is not a Start Fund requirement, most projects that include distribution also implement PDMs, an important information source on community perceptions. However, this was often the only form of project review, and there can be a high level of social desirability bias in PDM surveys as enumerators are often from the same organisation that provided assistance. In addition, the close-ended nature of surveys limits people's ability to share more diverse insights into issues such as participation, appropriateness of communication channels, or values such as dignity and respect. **Additional time to implement more participatory approaches as a part of review and evaluation, but also throughout the entire project cycle, could contribute to improvements in quality and efficiency of future responses**.

Participation versus influence

An adapted participation ladder captured people's perceived participation and influence in decision-making (*See Annex 4 for the complete case studies*). From an external perspective, many of the projects' participation examples may not be considered the type of actions that influence decision-making, an intended outcome of AAP-related activities. The examples are limited to data collection and consultations on logistical issues, rather than a higher level of participation such as making or influencing programmatic decisions, e.g., preference for cash distribution over in-kind distributions. During focus group discussions and household visits in both Country 1 (green) and Country 2 (yellow), interviewees indicated that participation levels were largely limited to receiving information on distribution logistics and receiving assistance (*Figure 5*). Country 3 (blue) indicated higher levels of participation.

Figure 5. Participation ladder from household interviews
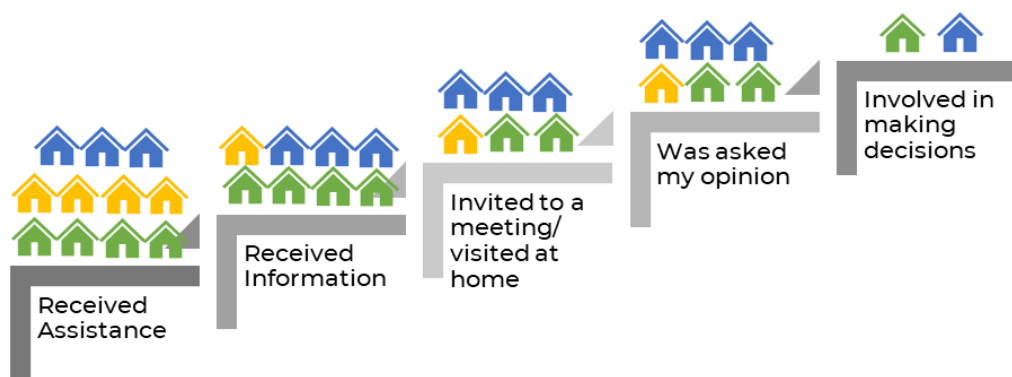
As we move up the ladder, fewer people reported being invited to a meeting or visited at home, and fewer still reported being asked for their opinion. The only household that reported feeling they were involved in making decisions explained they felt they were involved in decision-making because they were visited as a part of a household survey during the needs assessment.

The results from the focus group discussions with women and men provide further insight into participation and influence (*Figure 6* provides a key to the icons). In Country 1 (*Figure 7*), many of the decisions were programmatic decisions in the disease outbreak response (such as content and type of assistance, targeting) and were pre-defined by the Ministry of Health. The traditional community leader also played a gate-keeping role that created barriers to information sharing. An extract of results from a participation and influence ranking exercise completed during the FGDs show that the NGO was the most influential in decision-making throughout the project cycle

The community leader was the most influential after the NGO, and aid recipients were reportedly present for various processes, e.g., receiving items during the distribution, but did not influence decisions. Men perceived that women were more active in two-way communication, whereas women felt they were not involved and did not have knowledge of complaints and feedback mechanisms.

Stakeholder	Icon
Aid recipients	
Women	
Women's Committees	
Men	
Male Youth Leaders	
Neighborhood Associations	
Community Leader	
Community Committees	
Government	
NGO	

Figure 6. Icon key for participation and ranking exercise

Figure 7 Country 1 participation and influence ranking

PARTICIPATION & INFLUENCE

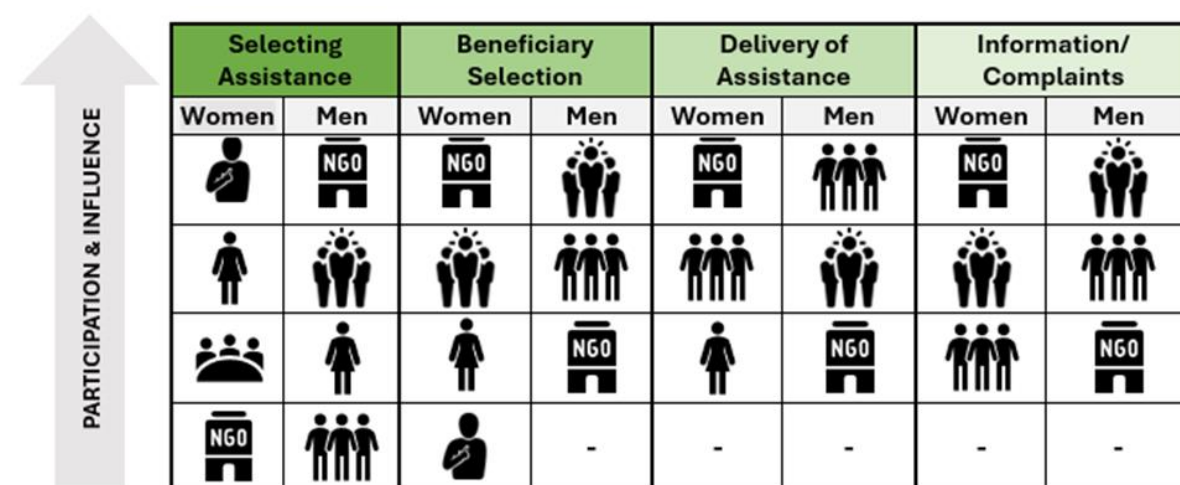| Selecting Assistance		Beneficiary Selection		Delivery of Assistance		Information/ Complaints	
Women	Men	Women	Men	Women	Men	Women	Men
NGO	NGO	NGO	NGO	NGO	NGO	Nothing to say	NGO
-	-		-			-	
-	-		-	-		-	-
-	-	-	-	-		-	-
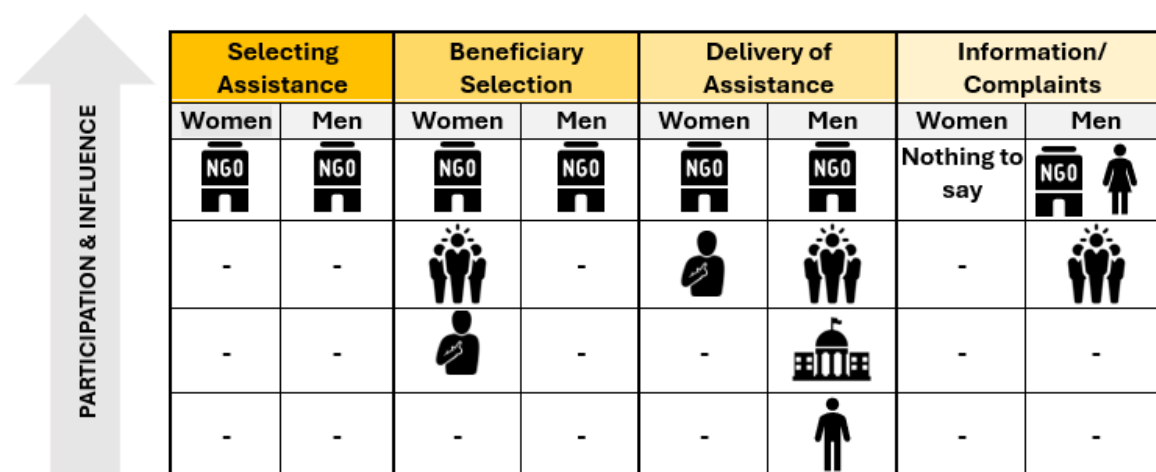
In Country 2, the NGO's direct presence in the community was limited, and information sharing was kept to a minimum for security reasons. The NGO considered the traditional leader to be a communication barrier during the project. Despite these perceived challenges, FGD participants — particularly women — experienced a high level of participation, and both genders felt that information sharing was satisfactory. Country 2 also revealed different perspectives between women and men (*Figure* 8). Women ranked their influence higher at certain points, while men felt they had a more passive involvement in the decision-making process: "We answered the survey questions and then the NGO decided what to do." The differences in ranking could be due to women serving as the needs assessment's primary source of information and because they were the direct recipients.

Figure 8. Country 2 participation and influence ranking

PARTICIPATION & INFLUENCE

Selecting Assistance		Beneficiary Selection		Delivery of Assistance		Information/ Complaints	
Women	Men	Women	Men	Women	Men	Women	Men
	NGO	NGO		NGO		NGO	
			NGO		NGO		NGO
NGO			-	-	-	-	-

This shows that directly involving women led to a higher perception of their involvement in decision-making, despite the possibility that these examples could be

considered extractive and tokenistic from an external perspective. This difference in an outsider's perspective and the experience of women in the affected population reinforces the importance of allowing affected populations to define how and when they participate. **There are power dynamics that can limit people's comfort in expressing themselves, and cultural or gender norms can play a role in whether people feel empowered to participate in decision-making**. Therefore, it is important to create specific opportunities for all population sub-groups to participate, including in ways that could influence decision-making.

Emerging themes of accountability in action

Response context

A range of response contexts were covered in the review, including responses to both natural and human-induced crises (*Annex 3*).

The Accountability Metric did not indicate any quantifiable differences among the response contexts as the mean and median scores were nearly the same when comparing natural shocks (specifically floods) with human-induced shocks, such as conflict. However, the qualitative review of the reports and the KIIs noted challenges specific to the different types of shocks. The challenges were often the same, e.g., access, but for different reasons and at different times during the project. For example, access was a constraint throughout the project cycle for conflict responses, whereas for natural shocks this constraint was mostly noted in the project's earlier phases.

Other response contexts also present different perspectives on accountability. For example, in projects with people on the move (mixed migration), the principles around participation and the use of formal communication channels were complicated by target populations' constant movement. In projects such as this, accountability work may focus more on ensuring physical presence to facilitate face-to-face interaction and making real-time changes based on people's feedback, without the use of a formal system.

You can basically see in their faces or in their voices, when something is not as appropriate or pertinent. And we just make the changes without...the procedure or the format that we have...

Similarly, disease outbreak responses had a high level of engagement from local and national government authorities, who defined the type of assistance and targeting thereby reducing communities' influence over these decisions.

The findings from a range of response contexts indicate the importance of adapting accountability practices according to the response context. For example, **where participation of the affected population may be constrained by external factors, information sharing efforts should increase so people understand why they are**

(or are not) receiving a certain type of assistance. This aligns with efforts to encourage humanitarian actors to consider "Information as Aid" and the belief that two-way communication can foster trust and respect.

I want to hear your voice. We serve you, we are not serving ourselves…this is a thing of horizontal relationships. If I go there, and do things [on] my own, and I don't hear what other people have to say, that's unconsciously saying that I'm above you…I think one of the things that I love, the most about working for X INGO is that we always try to put ourselves for the people and do the one-on-one.

Reliance on community leaders and committees

Engagement with community leaders and the formation of committees were the most common methods for facilitating affected populations' participation.

KIIs expressed challenges with community leaders in contexts where there were underlying issues of governance, particularly in fragile and conflict-affected settings. The same challenge arose in other settings, such as urban areas where community leaders played a gate-keeping role versus a facilitation role. In these cases, it was not clear if or how NGOs negotiated with leaders in order to facilitate a wider range of participation among the affected population. The sharing of effective and contextually appropriate methods to negotiate participation could be a learning topic, for example, at a thematic learning exchange on AAP in complex responses.

Community committees were frequently relied upon to facilitate project implementation including disseminating information, confirming beneficiary selection, and organizing distributions. While most projects proposed to form "representative" committees, the composition of the committees was not reported and therefore the degree to which they represented the affected population cannot be verified. In other cases, specific sub-groups were not systematically represented in community-level committees due to issues such as accessibility.

This was during visits to the homes of vulnerable people. In this case, the elderly. So, we did visit people, but not all of them. We got key information with one person, let's say, or two people, that's what we did. We don't bring them to a meeting because it is difficult for them because when people move around, it is complicated. Distance from the houses to the center of the community. In this case there are always leaders who also support us to gather information.

While the practicality of engaging with a committee is understandable, particularly in short-term projects, it is important to consider if and how they represent population sub-groups. In cases where they are not representative, directly engaging with affected people from these sub-groups is important, particularly in the needs assessment, design, and review stages.

Government as a key accountability stakeholder

Government authorities are highly involved in projects and have significant decision-making power. They are also the official duty bearers in terms of humanitarian response and normally, where their capacity is exceeded is where NGOs play a role. A range of local and national authorities also play a role in decision-making and information sharing. However, accountability guidance often focuses only on the relationship between NGOs and affected communities. It is important to acknowledge that in some humanitarian contexts, the accountability relationship between NGOs and authorities will need to be sensitively managed given the complex social and political context.

..No project will really succeed if you don't involve the local leadership. That is the government, and the best approach should be really community led...

Response and Anticipation projects

The Start Fund supports projects both after the impact of a shock and prior to a shock that are classified as anticipation projects. Thirteen anticipation projects (24 percent of 55) were reviewed to identify potential differences with response projects. Key informants did not identify any differences between the approaches or systems used for AAP in anticipation and response projects. While some differences are identified when reviewing the project documents and the metric, it is important to note that the sample size for the anticipation projects is very small. Overall, when comparing the metric scores, we see very minor differences (*Table 5*). For example, the mean sub-score for participation is slightly higher for anticipation projects, but response projects have a higher average score for CFM systems (partially due to the higher number of communication channels used in the CFM).

Table 5. Accountability Metric mean scores in response and anticipation projects

	Participation sub-score	CFM sub-score	Metric Total
Response	7	12	19
Anticipation	8	6	18

Document analysis shows that a lower percentage of anticipation projects met the requirements for a mix of communication channels (62 percent in response versus 31 percent in anticipation) (*Table 6*). There were no consistent differences with the level of participation reported between the two types of projects. However, the data does indicate an area for further exploration, as a lower percentage of anticipation projects reported adapting either to complaints or feedback received via the CFM, or during the course of implementation.

Table 6. Accountability indicators in response and anticipation projects

Indicator	Response (N=42)	Anticipation (N = 13)
Average number of CFM channels	4.3	3.5
Meeting CFM mix requirements	62% (n=26)	31% (n=4)
Received feedback/complaints	62% (n= 26)	62% (n=8)
Adaptations based on feedback/complaints	**62% (n=16)**	**50% (n=4)**
Participation in needs assessment	81% (n=34)	92% (n=12)
Sub-populations* involved in needs assessment	26% (n=9)	25% (n=3)
Participation in design	48% (n=20)	46% (n=6)
Sub-populations involved in design	15% (n = 3)	16% (n=1)
Participation in implementation	81% (n=34)	77% (n=10)
Sub-populations involved in implementation	15% (n=5)	30% (n=3)
Participation in adaptation	**31% (n=13)**	**23% (n=3)**
Sub-populations involved in adaptation	**54% (n=7)**	**33% (n=1)**
Participation in project review	79% (n=33)	62% (n=8)
Sub-populations involved in project review	21% (n=7)	25% (n=2)

Start Fund program challenges: duration and funding

The Start Fund model focuses on underfunded, small- to medium-scale crises. Decision-making on raising alerts and providing funding is grounded in local level decision-making. This ensures rapid humanitarian action to meet the most critical needs of affected populations. Projects have an implementation period of 45 or 60 days, and the delivery of assistance must start within seven days. Other mechanisms for rapid response do not use the same timeline; instead, they generally have longer implementation periods and no defined milestones in order to begin implementation. Regardless of the differences in timelines, KIIs noted that they use the same approaches to AAP in Start Fund projects as other humanitarian projects implemented in the same area.

The evaluation sample included 11 projects with a 60-day timeframe, but the analysis did not indicate any differences in metric score or key elements of AAP between 45- and 60-day projects. KIIs noted one significant difference with longer programs funded by other donors: the frequency and type of interaction with communities. In particular, KIIs noted that they had less direct engagement with people and a lower frequency of interactions, and that they used a narrower range of approaches. **Projects' short duration was the most frequently mentioned challenge in relation to AAP.**

*"Yeah, almost similar, except this current one was an emergency within the shortest time possible. So, you will find that **you will not fully exhaust the approaches that you wish to really do, but I think it's they're almost similar."***

No, I wouldn't say [finances] constrained the project, but the project is really constrained by the duration... *if you really want to do proper selection of beneficiaries in order to avoid any let's say, complaints from vulnerable population, you really need time.*

Also it is one of the lessons learned that it is important to have a continuous review and evaluation of the effectiveness of these systems. Unfortunately for the START Fund, although we have conducted a PDM and asked them what they think about our CFM, **the limited duration of the project does not allow us to really have solid inputs on how to improve our accountability to affected populations.**

Others noted that **funding was a constraint because it limited the frequency and level of interaction with affected populations.**

Maybe if funds were available, I would have wished to have more committees than the ones that we had. Our meetings were quite few because the project was short. It was only for a duration of 45 days. **So everything was just being done in haste and with little resources. So if, in future, I would love to have more funds or resources to allow us to have more meetings and have the interface between the project participants and the project.**

KIIs noted that in remote areas the distance between the office and the project sites required significant travel time, and budget constraints made it difficult to offer per diem for overnight stays, so staff often completed a roundtrip visit in one day. This resulted in limited time with the community.

It would be **ideal, let's say, to work more in the community, to have a little more time, to ask the people more about what has really happened to them so that one has an idea and to propose in the design** *of the project to...support the communities. This is something that we personally did not foresee because* **the time we had to recover the information was not enough.**

AAP perspectives in local, national, and international NGOs

The Start Network aims to contribute towards creating a locally led humanitarian system that is accountable to people affected by and at risk of crises. (Start Network ToC). In the case of the Start Fund, locally led means led by local and national organisations. This evaluation explored the differences between LNNGOs and INGOs in their AAP approaches. Within the evaluation sample, 75 percent (n=41) of projects were led by INGOs and 25 percent (n=14) were led by LNNGOs. The 14 projects led by LNNGOs constituted all projects implemented by LNNGOs during the evaluated period, except for one LNNGO.

A sub-set of 14 INGO projects were matched with the LNNGOs by project profile (country, hazard, and response type) to compare approaches to AAP between the two

types of organisations. While this approach increases the comparability among projects, it also results in a very small sample size from which to draw conclusions.

Overall, the total metric score was the same for projects led by INGOs and projects led by LNNGOs (*Table 7*). INGOs had a higher mean score for participation, whereas LNNGOs had a higher mean score for CFM systems. These minor differences could be explained by the small sample size or the quality of report writing.

Table 7. Accountability Metric mean scores for INGOs and LNNGOs

	Participation sub-score	CFM sub-score	Metric total
INGO	9	11	20
LNNGO	7	13	20

Similar to the metric score, the document analysis did not present consistent trends or large differences in AAP approaches (*Table 8*). For example, a higher percentage of LNNGO projects met the requirements for an appropriate mix of CFM channels (71 percent) versus INGOs (43 percent). This is largely driven by having a higher average number of communication channels, and not necessarily by a more nuanced approach to selecting the most appropriate channels. Both INGOs and LNNGOs reported a similar level of participation from the affected population. However, a higher percentage of INGO projects reported more consistently including population sub-groups in the project cycle. There are mixed results related to project adaptation, another key measure of accountability, with more INGO projects reporting general adaptations throughout the course of implementation and more LNNGO projects reporting adaptations based on input from CFMs.

Table 8. Accountability indicators in INGO and LNNGO projects

Indicators	LNNGO (14)	INGO (14)
Average number of CFM channels	5	4
Meeting CFM mix requirements	**71% (n=10)**	**43% (n=6)**
Received feedback/complaints	71% (n=10)	57% (n=8)
Adaptations based on feedback/complaints	**80% (n=8)**	**63% (n=5)**
Participation in needs assessment	93% (n=13)	86% (n=12)
Sub-populations* involved in needs assessment	**31% (n=4)**	**50% (n=6)**
Participation in design	50% (n=6)	58% (n=7)
Sub-populations involved in design	**0% (n=0)**	**29% (n=2)**
Participation in implementation	86% (n=12)	79% (n=11)
Sub-populations involved in implementation	**8% (n=1)**	**44% (n=4)**
Participation in adaptation	**14% (n=2)**	**50% (n=7)**

Sub-populations involved in adaptation	50% (n=1)	29% (n=2)
Participation in project review	79% (n=11)	86% (n=12)
Sub-populations involved in project review	27% (n=3)	25% (n= 3)

Other assumptions highlighted in the literature review and Start Fund background documents were explored. For example, it is posited that LNNGOs have a better understanding of local languages. However, both INGOs and LNNGOs experienced challenges matching their staff profile with the diversity of languages in the implementation area.

Some challenges like communication gap were there because some people belong to the tribal groups, and the language is a little bit different from ours. **There were a little bit of communication gap like some didn't understand our language, the normal language of X area and they are only familiar with the tribal language.** *So, in some cases, there were these challenges. Okay, these were overcome, as I have already mentioned that* **our field-level volunteers belong to the same tribal community…**

Translation by community-level volunteers was the most common solution to this challenge. Among other risks, reliance on a limited number of local language speakers can create a bottleneck in participation, information sharing, and potentially the receipt of complaints or feedback through channels such as centralized hotlines.

Another common assumption identified in the literature review is that LNNGOs have a stronger local presence than INGOs. Of the projects reviewed in this evaluation, INGOs that received direct funding reported an average operational presence of 16 years compared to an average of 6 years for LNNGOs that received direct funding. Interestingly, LNNGOs that are sub-grantees to INGOs had an average presence of 14 years. The difference in operational presence between LNNGOs that receive direct funding versus those that are sub-grantees for INGOs requires further exploration.

Overall, LNNGOs and INGOs faced many of the same challenges and demonstrated similar levels of success in AAP. The differences appeared in the implementation characteristics of a given project, regardless of the type of organisation. For example, frequently sharing information using people's preferred communication channels or consistently engaging the same population sub-groups throughout the project cycle are approaches that appeared to be effective in increasing people's perceived participation. Strategic partnerships with organisations that have expertise in key population sub-groups (e.g., older people or people with disabilities) could be promoted as a standard way of working.

There are, however, differences in funding levels. Due to the Start Network's tiered due diligence frameworks, many LLNGO members have lower funding thresholds. The average budget for INGOs is £204,000, compared to that of LNNGOs which is £133,000. This may pose a constraint for LNNGOs to fully integrate AAP principles and

practices. It should be noted that these budgets do correlate with the number of people assisted, i.e., projects with higher budgets are providing assistance to more people. However, there are potential hidden costs to facilitating AAP, such as the number of staff dedicated to a project or the number of vehicles available to enable a higher frequency of travel to project communities. In addition, differences in access to core, unrestricted funding between INGOs and LNNGOs may have an impact on certain aspects of AAP, such as the level of broader organisational support in establishing policies, systems, and resources to train staff.

We have not yet managed to standardize information, to standardize activities, because, well, **international agencies are 23 steps ahead of X LNNGO in terms of safeguards, complaint management and everything,** *mechanisms. Some of them even have applications to do that kind of work.*

Accountability in Start Fund processes

Underlying principles related to accountability are embedded throughout Start Fund values, systems and processes. The Start Fund Handbook acknowledges that meaningfully integrating accountability to affected populations into programmes goes beyond a focus on CFMs, and includes the influence that populations have on aid delivery, and the need for flexibility and agility in understanding and responding to changing needs. The handbook also acknowledges the central role of two-way communication.

> **Influence of populations:** The Start Fund will seek to incentivise two-way communication with populations at risk of and/or affected by humanitarian crises. It will reward organisations that enable affected populations to help shape how aid is delivered. (Start Fund Handbook)
>
> **Start Fund project flexibility and agility:** At times, complaints and feedback (…) may result in changes to project design. Changes may also be required which arise from the dynamic nature of humanitarian crises and the evolving situation on the ground. Members that have been awarded funding to implement Start Fund projects are encouraged to be flexible and agile, while remaining accountable to affected populations and the Start Network membership. (Start Fund Handbook)

The Start Fund makes strong AAP commitments, setting expectations for how accountability principles will be put into in practice at each stage of the alert cycle. There are three elements of accountability embedded in Start Fund processes that correlate to commitments 1, 2, 4 and 5 of the CHS Core Humanitarian Standard on Quality and Accountability. However, **there is no clear through-line that connects AAP and the different** processes, from proposal review to reporting and culminating in project learning. Developing a reference document or "cheat-sheet" could help Start Fund staff and project selection committee members read proposals and

reports through an "accountability lens" and **spot common issues** that affect AAP practice.

Process documents reviewed reflect both the underlying principles related to accountability and guidance for how they should be translated into practice (detailed recommendations are included in Volume II). The document review also revealed that members have different levels of understanding in relation to key AAP terminology (confidential and anonymous; complaints versus feedback) and some partners expressed viewpoints that run counter to core AAP concepts like inclusion, e.g., *If persons with disabilities express limitations in using those mechanisms, we will make sure to adapt them for their use.*

Project selection, proposals, and reporting

It is currently optional for project selection committees to consider accountability, with proposal pre-screening limited to a compliance check on the number and type of CFM channels. However, some selection committees are providing thoughtful questions and contextualized recommendations, which could inspire members to share good practices with each other and their partners. The Start Fund could consider how to **share feedback from project selection committees**, **to promote learning and capacity building** towards members (particularly within Start Network Hubs and for newer members), and their long-term partners.

our assumption and the reasoning behind the project selection (being) done in-country is we find people that work in Country X that know Country X well...They would be joining the project selection committee, and they would be the ones looking at that proposal and deciding whether or not it's fit for purpose. So, in a way that's how we try to bring in the local contextual knowledge into that as much as possible.

While the proposal format includes systems-level questions on CFM systems and information sharing, the content is often generic, limiting the utility of these questions as a method for assessing AAP. The Start Fund could instead shift to **asking specific, granular questions on aspects central to key AAP processes,** e.g., how were people from different population sub-groups consulted during the needs assessment?

Detailed budgets were not part of this document review, however AAP-related costs were not reflected in project proposal budgets along with AAP activities and practices such as community engagement, consultation, communication, and the provision of CFM channels. Understanding the administrative and financial costs of all AAP components will allow the Start Fund to better support members and their partners. The Start Fund could consider how to **create incentives for members to invest more explicitly in meaningful AAP activities and staffing**, for instance through a designated budget line in proposals or reports, or by issuing guidance on which AAP-related costs can be reported as project rather than support costs.

KIIs with Start Fund staff confirmed that **reports did not consistently showcase how accountability was integrated into projects**. One area for improvement in the report format is the choice of CFM channels. The report format's pre-defined boxes for CFM channels do not include informal, community-based structures that are often the preferred channels for feedback, namely committees and community volunteers. The report format also lacks specific questions on information sharing and two-way communication. Without these details, it is challenging to know how AAP practices unfold at the project level, making broader evaluation and learning more limited at the Fund level. The Start Fund should **incorporate information sharing and two-way communication into the report format** to reflect this Start Fund AAP pillar, fostering trust and respect between member agencies and affected populations.

In some cases, KIIs revealed different information on projects' CFMs than was provided in reports, including the type of channels and the nature and volume of feedback and complaints. This may have been driven by the fact that 64 percent (n=35) of projects were implemented by more than one NGO. Fifty-two percent of INGO projects included sub-grants to LNNGOs, who led implementation, with INGOs providing technical oversight or quality assurance systems. KIIs showed that organisations often did not coordinate with implementing partners on information sharing or complaints and feedback. While some members provided clear reporting on their implementation arrangements, it was not always easy to interpret information on sub-granting in proposals and reports.

Learning processes

Learning exchanges were considered most useful where there have been several responses to the same alert, but there were relatively few of these in 2023, limiting opportunities for comparison among members. Nonetheless, many projects featured some form of partnership (whether consortia or sub-granting). Any common or coordinated AAP approaches and processes that were implemented in these projects could be a fruitful focus for a learning exchange.

The Start Fund could **revise Learning Exchange guidance** to include thematic exchanges focused on AAP and adapt questions to focus on identifying solutions to the most challenging aspects of AAP. Updating the accountability questions for the learning exchanges, and making these mandatory, would promote transparency and help address any perceived stigma around "complaints."

Learning grants offer another opportunity to invest in accountability based on a project's lessons and, in the case of anticipation, could also take the form of preparedness grants. The Start Fund could consider **requiring all learning grants to include participatory reflection and learning with communities.** Learning processes, including learning grants, are also an opportunity to **solicit member input**

on how to capture face-to-face feedback or other informal communication, and how it may have led to adaptations.

Alongside these changes, the Start Fund could implement broader capacity-building approaches, including regular training for those supporting efforts to make aid more locally led. These learning initiatives could further integrate learning, innovation, and cross-fertilization around accountability.

Opportunities to enhance AAP through the Hub model

The Start Network is growing through the creation of Hubs: dynamic, locally led coalitions that are collaboratively developing sustainable approaches to humanitarian action in various countries, including Pakistan, Afghanistan, Bangladesh, India, South Sudan, and the Democratic Republic of Congo (DRC). Start Network Hubs represent the driving direction of the Network, a new distributed model that seeks to localize and improve humanitarian action.

Start Network Hubs' emphasis on community voices in decision-making processes encourages a shift in power dynamics and models another way of working together with communities. One example is the community-led innovation program, entirely helmed by communities with limited Hub members' support. As one Start Network Hub member put it:

Issues around accountability or participation of communities in leading their own transformational development is possible, if only we are willing to step back, if only we are willing to unlearn.

Start Network Hubs present an opportunity to strengthen relationships between local actors, civil society and government, which in turn leads to more effective feedback mechanisms. Start Network Hubs are uniquely positioned to leverage cross-sectoral connections beyond the scope of a project cycle or a single organisation's partners. Investing in these local networks, one Hub member shares:

says a lot around accountability, if we're sharing information amongst ourselves and civil society, then different actors have that information to work together, to speak to the community, to be able to feedback. There's strength in those collaborations and those partnerships.

Collaboration between Start Network Hubs, whether it is biweekly calls or **learning exchanges on similar programs, demonstrates the potential for Start Network Hubs to drive the culture of learning from the country to the global level** within the Start Network.

Although there are signs of progress, Start Network Hub members face several challenges in changing established humanitarian practices and encouraging more community-centered approaches. The Start Network's evolution towards

independent, interconnected hubs is in its early stages, and it will take time for Start Network Hub members to establish the ways they will work together to improve accountability.

Conclusion

While the core elements of AAP are integrated to varying degrees across projects, Start Network members are committed to being accountable to affected populations. This foundation provides rich opportunities to continue improving AAP in practical and meaningful ways for communities. The Start Network's broader focus on locally led humanitarian action and decentralizing aid are key enablers to empowering communities to influence humanitarian assistance. At the same time, it is important to reflect on the ways of working and core assumptions held by the Start Fund. Questions emerging from the evaluation findings include:

- Considering the barriers to AAP created by the short duration of projects and specific milestones (e.g., start within seven days and reporting within 30 days), how can the Start Fund remain grounded in its mission and values but at the same time be adaptable?
- Moving beyond a focus on the type of organisation, what are the implementation characteristics that empower communities and align humanitarian assistance with their preferences?
- LNNGOs often face a funding ceiling based on their classification tier. To what degree does this impact their ability to develop the systems and capacities required to meet AAP standards and to capture learning that informs response quality?
- How can the Start Fund facilitate more learning among members, using participatory approaches that are inclusive of all population sub-groups to improve AAP and ultimately, humanitarian response?

Funders are in a difficult position because they do not directly implement the actions that ensure accountability to affected populations, yet their policies and systems directly affect the environment for NGOs to fulfill AAP commitments. The Start Fund could play a convening role, bringing humanitarian funders together to consider how collective and harmonized efforts at the funding level can enable Network members to engage communities in decision-making. This could be an opportunity to explore radical adaptations to how funding is provided. For example, could proposals be funded without a pre-defined list of activities? How can funders be flexible while at the same time continuing to be responsible custodians of financial resources? Internal reflection on systems-level questions, and expanding beyond processes and towards learning, could support Start Network members to be more accountable to affected populations.

Bibliography

1. *Financial Management and Assurance Check-in: Checklist*. Start Network, February 2023. https://start-network.app.box.com/s/ab0cq99lqdd4eld38qoq600t6mwsglgi.

2. *Financial Management and Assurance Check-in: Methodology and Tool*. Start Network, February 1, 2023. https://start-network.app.box.com/s/ktfxn7cdnmfeorb4p98ipsw513ywv3lv.

3. *Financial Management and Assurance Check-in Tool*. Start Network. Accessed November 27, 2023. https://start-network.app.box.com/s/js450yy9jk6u1y586f735bf5t68cuqe2.

4. Start Fund. *Guidance Note: Accountability and Safeguarding in Start Fund Projects*. Accessed August 25, 2023. https://netorgft9232637.sharepoint.com/:w:/r/sites/TsunaguOperations/_layouts/15/Doc.aspx?sourcedoc=%7B756FDD23-D599-4CED-94D6-2C72F3E54E19%7D&file=Start%20Fund%20Guidance%20Note%20on%20Accountability%20and%20Safeguarding.docx&action=default&mobileredirect=true.

5. ———. *Overview of Start Fund Learning Exchanges*. Start Network, February 21, 2017. https://start-network.app.box.com/s/hnm6211e0uw0bzlne6fa7jzx2zpa5hl8/file/1284147117378.

6. ———. *Start Fund Project Selection Criteria*. Start Network, January 26, 2023. https://start-network.app.box.com/s/hnm6211e0uw0bzlne6fa7jzx2zpa5hl8/file/1284154442339.

7. ———. *Start Fund Report Form Template*, February 21, 2023. https://start-network.app.box.com/s/hnm6211e0uw0bzlne6fa7jzx2zpa5hl8/file/1284151389337.

8. ———. *The Start Fund Handbook*. Start Network, Save the Children. Accessed November 27, 2023. https://startprogrammes.app.box.com/s/zsqlezvuv23whai9px2la5nh7y5nevv

9. ———. *Start Fund Alert Note Template*. Start Network, March 2022. https://start-network.app.box.com/s/hnm6211e0uw0bzlne6fa7jzx2zpa5hl8/file/1284146031687

10. ———. *Start Fund Allocation Core Considerations*. Start Network, November 2022. https://start-network.app.box.com/s/hnm6211e0uw0bzlne6fa7jzx2zpa5hl8/file/1284151924776.

11. ———. *Start Fund Allocation Decisions*. Start Network, April 2022. https://start-network.app.box.com/s/hnm6211e0uw0bzlne6fa7jzx2zpa5hl8/file/1284147052378.

12. ———. *Start Fund Project Assessment Tool: Alert 640 Armenia,* October 2022. https://start-network.app.box.com/s/29itsa7kt3ludpqct6obsqcy16dj7amy/file/1307000063538.

13. ———. *Start Fund Project Assessment Tool: Alert 705 DRC*, July 17, 2023. https://start-network.app.box.com/s/29itsa7kt3ludpqct6obsqcy16dj7amy/file/1306989548747.

14. ———. *Start Fund Project Assessment Tool Kit*. Start Network, September 23, 2022. https://start-network.app.box.com/s/hnm6211e0uw0bzlne6fa7jzx2zpa5hl8/file/1284148031547.

15. ———. *Start Fund Project Learning Exchange: Alert 649 El Salvador,* January 12, 2023. https://start-network.app.box.com/s/29itsa7kt3ludpqct6obsqcy16dj7amy/file/1306036271973.
16. ———. *Start Fund Project Learning Exchange: Alert 680 Zimbabwe*, May 4, 2023. https://start-network.app.box.com/s/29itsa7kt3ludpqct6obsqcy16dj7amy/file/1306045681209.
17. ———. *Start Fund Project Learning Exchange: Alert 685 South Sudan*, May 11, 2023. https://start-network.app.box.com/s/29itsa7kt3ludpqct6obsqcy16dj7amy/file/1306046733185.
18. ———. *Start Fund Project Learning Exchange: Alert 701 India,* August 7, 2023. https://start-network.app.box.com/s/29itsa7kt3ludpqct6obsqcy16dj7amy/file/1306045698196.
19. ———. *Start Fund Project Learning Exchange: Alert 708 South Sudan,* August 17, 2023. https://start-network.app.box.com/s/29itsa7kt3ludpqct6obsqcy16dj7amy/file/1306040622669.
20. ———. *Start Fund Project Learning Exchange Recording: Alert 649 El Salvador*. Video. Start Network, 2023. https://start-network.app.box.com/s/29itsa7kt3ludpqct6obsqcy16dj7amy/file/1307000432792.
21. ———. *Start Fund Response Project Proposal Template*. Start Fund, February 20, 2023. https://start-network.app.box.com/s/hnm6211e0uw0bzlne6fa7jzx2zpa5hl8/file/1284154657598.
22. Start Network. *Midterm Report on the Start Fund Localisation Pilot.* Pilot Learning Report, April 2021. https://start-network.app.box.com/s/b1nclnitrw5qcl3lloe7wz3i6jao5ton.
23. ———. *Start Fund Responses Led by Local and National Members*. Learning Paper, December 9, 2022. https://start-network.app.box.com/s/qn5si9qp484dph9sch5bj018069saa7k.
24. *Start Network Finance Management and Assurance Check-in Tool*. Video, 2023. https://www.youtube.com/watch?v=u-tSeqzfNvY.

Annexes

Annex 1. Evaluation Questions

1. To what extent are affected and at-risk populations taken account of, given account to, and able to hold humanitarian agencies and donors to account in key stages of the project cycle during, including in advance of, Start Fund projects (anticipation and response)?

2. Does the level of participation and accountability in Start Fund-supported projects differ from longer-term humanitarian projects implemented by the same Start Network member in the same response or geographic area?

3. What does evidence and experience indicate regarding differences between LNNGOs and INGOs in their approaches to accountability to affected populations?4. What are the key challenges faced by Start Network members in ensuring accountability to affected populations in 45-day or 60-day Start Fund projects?

4. What adaptations to the Start Fund model would be necessary to increase the Start Fund's direct or indirect accountability to affected populations?

5. What theoretical opportunities does the hub model offer in terms of enhancing AAP in the context of (global) Start Fund-enabled humanitarian action?

Annex 2: Start Network and Start Fund Theories of Change
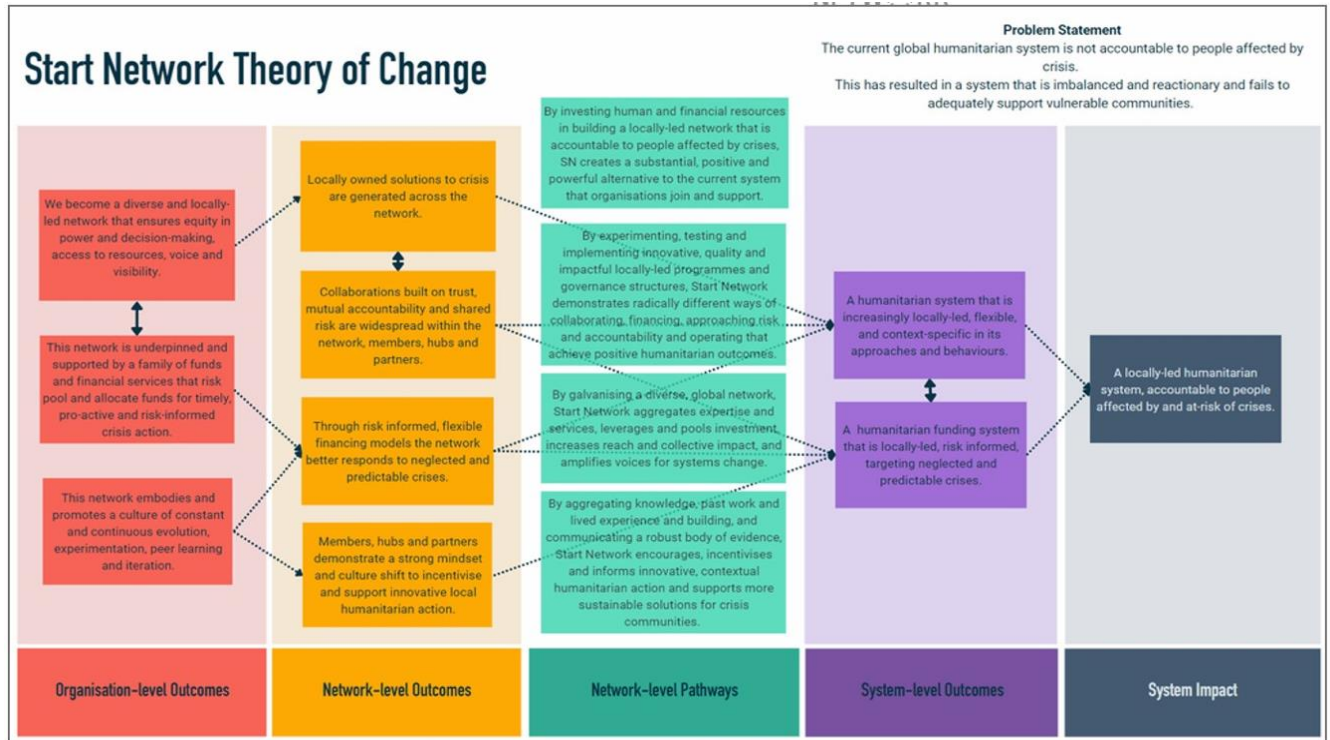
Start Fund Theory of Change
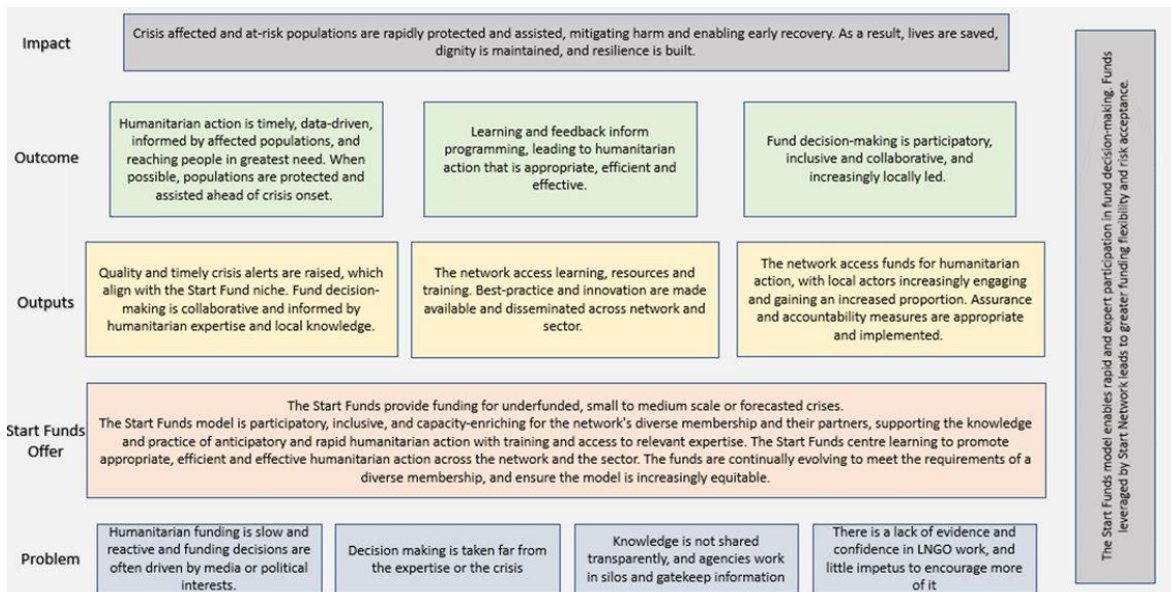
Annex 3: Accountability Metric Scores

ID	Type	Crisis	Lead	Sub-Grants	Presence of the Lead	Metric	Ranking	Participation Score	Ranking	CFM Score	Ranking
M_1	Response	Flood	LNNGO	No	Yes	18	Low	7	Low	11	Low
M_2	Response	Flood	LNNGO	No	Yes	21	High	9	High	12	High
M_3	Anticipation	Storm	INGO	Yes	No	18	Low	6	Low	12	High
M_4	Response	Conflict	LNNGO	No	Yes	20	High	5	Low	15	High
M_5	Response	Flood	INGO	Yes	Yes	21	High	9	High	12	High
M_6	Response	Flood	LNNGO	Yes	Yes	21	High	10	High	11	Low
M_7	Response	Fire	LNNGO	No	Yes	23	High	9	High	14	High
M_8	Anticipation	Fire	LNNGO	Yes	No	18	Low	7	Low	11	Low
M_9	Response	Storm	LNNGO	No	Yes	22	High	4	Low	18	High
M_10	Response	Storm	LNNGO	No	Yes	18	Low	7	Low	11	Low
M_11	Response	Flood	INGO	Yes	Yes	13	Low	1	Low	12	High
M_12	Response	Flood	LNNGO	No	Yes	14	Low	2	Low	12	High
M_13	Response	Flood	INGO	No	Yes	27	High	16	High	11	Low
M_14	Response	Displacement	INGO	No	Yes	23	High	12	High	11	Low
M_15	Response	Displacement	LNNGO	No	Yes	19	High	9	High	10	Low
M_16	Response	Displacement	INGO	No	Yes	26	High	12	High	14	High
M_17	Anticipation	Cyclone	LNNGO	Yes	No	21	High	7	Low	14	High
M_18	Anticipation	Cyclone	LNNGO	No	Yes	23	High	10	High	13	High
M_19	Response	Earthquake	INGO	Yes	No	27	High	16	High	11	Low
M_20	Response	Flood	INGO	No	Yes	14	Low	6	Low	8	Low
M_21	Anticipation	Other	INGO	Yes	Yes	11	Low	2	Low	9	Low
M_22	Response	Flood	INGO	Yes	Yes	28	High	13	High	15	High
M_23	Anticipation	Cyclone	INGO	Yes	Yes	15	Low	3	Low	12	High
M_24	Response	Flood	INGO	Yes	Yes	15	Low	3	Low	12	High
M_25	Response	Displacement	INGO	Yes	Yes	20	High	10	High	10	Low
M_26	Response	Flood	INGO	No	Yes	19	High	5	Low	14	High
M_27	Response	Disease Outbreak	INGO	No	Yes	15	Low	8	High	7	Low

M_28	Response	Flood	INGO	Yes	Yes	20	High	9	High	11	Low
M_29	Response	Hurricane	INGO	Yes	Yes	9	Low	2	Low	7	Low
M_30	Anticipation	Disease Outbreak	INGO	Yes	Yes	10	Low	8	High	2	Low
M_31	Response	Cyclone	INGO	Yes	Yes	11	Low	3	Low	8	Low
M_32	Response	Flood	INGO	Yes	Yes	23	High	8	High	15	High
M_33	Anticipation	Storm	INGO	Yes	Yes	17	Low	9	High	8	Low
M_34	Response	Flood	INGO	Yes	Yes	25	High	10	High	15	High
M_35	Anticipation	Displacement	INGO	Yes	Yes	20	High	10	High	10	Low
M_36	Response	Storm	INGO	Yes	No report	19	High	7	Low	12	High
M_37	Response	Conflict	INGO	Yes	Yes	12	Low	5	Low	7	Low
M_38	Anticipation	Cyclone	INGO	No	Yes	15	Low	6	Low	9	Low
M_39	Response	Cyclone	INGO	No	Yes	18	Low	7	Low	11	Low
M_40	Response	Cyclone	INGO	Yes	Yes	21	High	9	High	12	High
M_41	Response	Flood	INGO	Yes	Yes	18	Low	4	Low	14	High
M_42	Anticipation	Mixed Migration	INGO	Yes	Yes	19	High	8	High	11	Low
M_43	Response	Food Insecurity	INGO	Yes	Yes	11	Low	0	Low	11	Low
M_44	Response	Displacement	INGO	No	Yes	13	Low	4	Low	9	Low
M_45	Response	Conflict	LNNGO	Yes	Yes	27	High	9	High	18	High
M_46	Response	Mixed Migration	INGO	Yes	Yes	9	Low	1	Low	8	Low
M_48	Anticipation	Flood	LNNGO	Yes	Yes	18	Low	7	Low	11	Low
M_49	Response	Drought	INGO	Yes	Yes	12	Low	4	Low	8	Low
M_50	Response	Hurricane	INGO	Yes	Yes	31	High	13	High	18	High
M_51	Anticipation	Flood	INGO	Yes	Yes	30	High	18	High	12	High
M_52	Response	Flood	INGO	Yes	Yes	17	Low	9	High	8	Low
M_53	Response	Conflict	INGO	No	Yes	20	High	7	Low	13	High
M_54	Response	Disease Outbreak	INGO	No	Yes	22	High	6	Low	16	High
M_55	Response	Conflict	INGO	Yes	Yes	20	High	9	High	11	Low
M_56	Response	Disease Outbreak	INGO	Yes	Yes	10	Low	3	Low	7	Low

Annex 4: Country Case Studies

Using data collected through participatory methods, these case studies provide community perspectives on the main elements of accountability. They are designed to facilitate reflection on key issues such as participation and influence to inform learning. Icons are used throughout to represent key stakeholder groups:

Stakeholder	Icon
Aid recipients	
Women	
Women's Committees	
Men	
Male Youth Leaders	
Neighborhood Associations	
Community Leader	
Community Committees	
Government	
NGO	

Case Study 1: Between a Rock and a Hard Place

Project Snapshot

- Cholera outbreak response in urban and peri-urban areas.
- Hygiene kit content and targeting defined in the Ministry of Health outbreak response strategy.
- Traditional leadership created challenges in information sharing and beneficiary selection.

Complaints and Feedback Mechanisms

The CFM channels included a distribution help desk, a complaint box, and feedback directly to the NGO staff. While men participating in the focus group discussions (FGDs) perceived that women were more aware of how to share complaints, women reported that they did not know how to ask questions or share feedback. Participants shared that they preferred face-to-face interaction through increased NGO staff presence in the community and direct access through phone calls.

Information Sharing

Information sharing was limited due to the short duration of the project and challenges with traditional leaders. Despite the civil society partners calling community members to inform them of the distribution date and time, most participants were unaware of why they were selected for the project. People suggested alternative channels for information sharing: religious leaders, phone calls, SMS, community gatherings, and brochures/posters.

Credit: Plan International, Cameroon

Participation & Influence

Participants reported that the NGO and community leaders influenced key decisions throughout the project cycle. When community members did participate, their participation was limited to surveys and receiving items during the distribution. Men reported that they were more involved in the delivery of assistance as they were the majority of those who received aid through the project.

	Selecting Assistance		Beneficiary Selection		Delivery of Assistance		Information/ Complaints	
	Women	Men	Women	Men	Women	Men	Women	Men
	NGO	NGO	NGO	NGO	NGO	NGO	Nothing to say	NGO 👤
	-	-	👪	-	👤	👪	-	👪
	-	-	👤	-	-	🏛	-	-
	-	-	-	-	-	👤	-	-

PARTICIPATION & INFLUENCE

Women participating in household interviews provided a similar picture of their level of influence in the project. Only one woman reported participation beyond receiving assistance.

Timeline

The community members' perspective of the project timeline reinforces the limited opportunities for participation and information sharing, with women reporting less direct interaction than men.
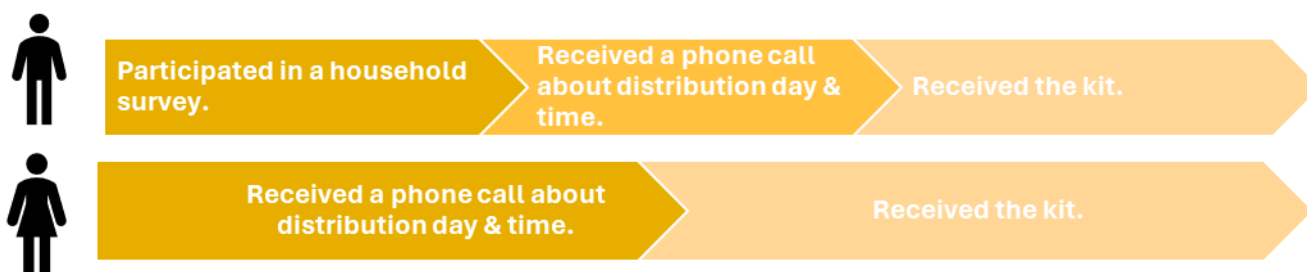
Beneficiary Perspective

Participants uniformly expressed the desire for more opportunities to participate in and influence decision-making. They provided several suggestions including hygiene kit contents (adding bleach and detergent) and investing in more sustainable interventions to address the underlying causes of cholera transmission.

Key Take-Aways

- When external factors limit one area of accountability, such as participation, the level of effort may need to increase in other areas, e.g., information sharing.
- Sharing information on how decisions are made and by whom is a part of accountability.
- Asking people, including representatives of population subgroups, their preferred communication channels during the needs assessment can inform the design of the complaints and feedback mechanism.
- Using a range of communication channels can ensure that information flows between affected populations and NGOs, even when there are challenges with traditional leadership.

Case Study 2: Putting Women at the Center

Project Snapshot

- Emergency assistance in a rural community after an attack by non-state armed actors.
- Security concerns limited the number of visits to the community and information sharing.
- Women's empowerment is a core organizational value.

Complaints and Feedback Mechanisms

The CFM channels included a distribution helpdesk, a dedicated phone line, surveys, and speaking directly to staff. People in focus group discussions (FGDs) and individual interviews reported being satisfied with the options available to provide feedback and felt their questions were responded to in a timely manner, although some did note challenges in reaching the NGO via the phone line.

Information Sharing

Due to security constraints, the NGO had limited field presence and relied on communication via phone with the traditional chief to share information. The traditional chief disseminated information to the households through the male youth leaders. Despite the NGO having concerns regarding the flow of information through the community leader, participants were satisfied with this approach and did not suggest other ways to share information.

Credit: Action Aid, Nigeria

Participation & Influence

The ranking exercise revealed differences in women's and men's perspective. Women consistently ranked their influence higher, while felt that despite being consulted, the NGO and the community leaders largely made the decisions. The differences in ranking could be attributed to women being the primary source of information during the needs assessment and direct recipients of assistance. The male youth leaders played an important role in sharing information and distribution logistics.

Older people participating in individual interviews also reported similar levels of women's participation at key points. People reported that the household survey used during the needs assessment and beneficiary selection process allowed them to express their opinions and participate in decision-making.
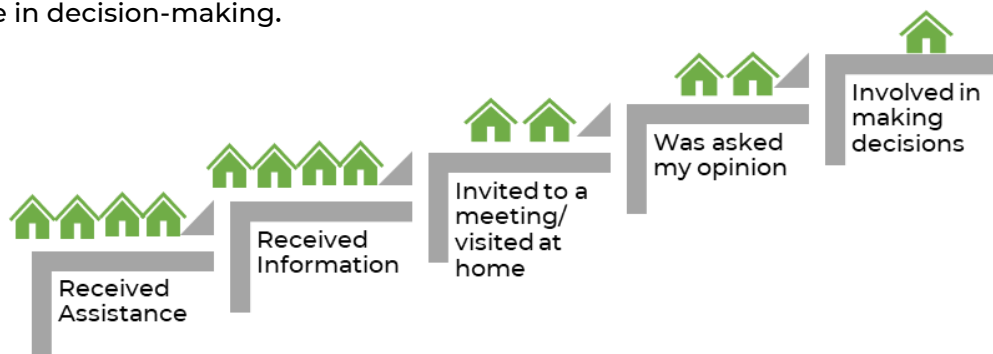
Timeline

The women's timeline provides a high level of detail, reinforcing their central role throughout the project. However, the men's focus group and household interviews identified fewer project milestones.

Beneficiary Perspective

Participants reported being satisfied with their role in decision-making. While some older people noted that they would have preferred that the health center was repaired, there were no other suggestions for the project.

Key Take-Aways

- Directly involving women led to a higher perception of their involvement in decision making.
- While an external perspective might perceive the women's engagement as extractive and tokenistic, women still valued the participation. These difference reinforce the importance of allowing affected populations to define how and when they participate.
- Create specific opportunities for all population sub-groups to participate, including in ways that could influence decision-making. However, care should be taken as power dynamics, as well as gender and cultural norms, can play a role in whether people feel empowered to participate in these opportunities.

Case Study 3: Working with Community Committees: Representation Makes a Difference

Complaints and Feedback Mechanisms

The CFM channels included a dedicated phone line and speaking directly to staff. Given the remoteness of the area, a combination of in-person and remotely accessible methods was important. People who had complaints reported they were immediately resolved when they were shared with the project staff.

Information Sharing

Information sharing occurred primarily through meetings organized by the Community Development Council (CDC) and the Women's Committee. The Women's Committee had a WhatsApp chat group which allowed information to be widely and rapidly shared. Information was further shared through neighborhood associations. While Spanish is spoken by many members of this community, due to its remoteness literacy rates are low and many people only speak the indigenous language.

Project Snapshot

- Early response in flood prone indigenous communities.
- Remoteness and road access limited the frequency and duration of visits.
- The indigenous Community Development Council managed the installation of water systems at the community level.
- Household level assistance (food baskets and medical assistance) was managed by the Women's Committee.
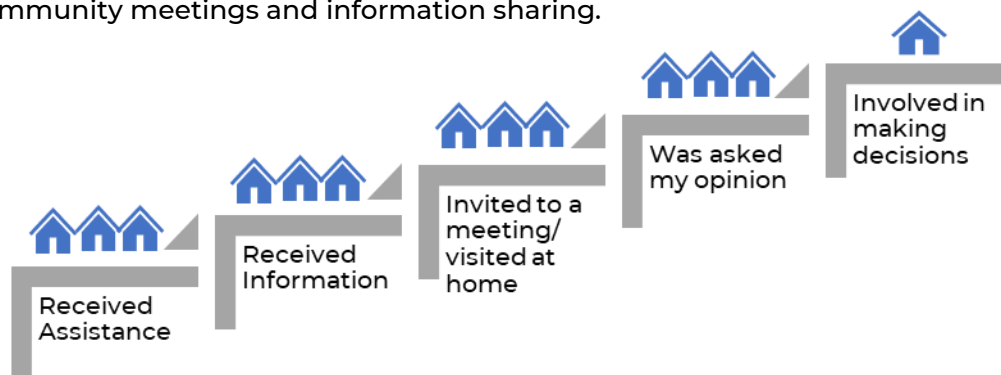
Participation & Influence

The ranking exercise provided insight into the roles and responsibilities for the different community structures. The CDC is the official structure responsible for investments in the community and the Women's Committee sits under the Council in its hierarchy. In this project, the roles of each committee appeared to be separated indicating that the sphere of influence for the Women's Committee was limited to the household level assistance. However, the men's group which was more focused on community-level investments, only mentioned the CDC when the stakeholders were ranked. It does not appear that women (or any other population sub-groups) were consulted in the design of the water supply intervention. The FGD participants themselves were not ranked as participating in decision-making.

	Selecting Assistance		Beneficiary Selection		Delivery of Assistance	
PARTICIPATION & INFLUENCE	Women	Men	Women	Men	Women	Men
	(people icons)	(people icons)	(people icons)	(people icons)	(people icons)	(people icons)
	-	-	(houses/road icon)	-	-	-

However, those participating in the household-level interviews indicated that they had an overall high perception of their participation, despite their engagement primarily being through community meetings and information sharing.

Received Assistance

Received Information

Invited to a meeting/ visited at home

Was asked my opinion

Involved in making decisions

Timeline

Household-level interviewees provided a detailed project timeline, highlighting the key meetings and decision points.

| CDC meeting | Women's Committee meeting | Decision making by committee | Information meeting | Beneficiary list finalized | Delivery of assistance | Survey |
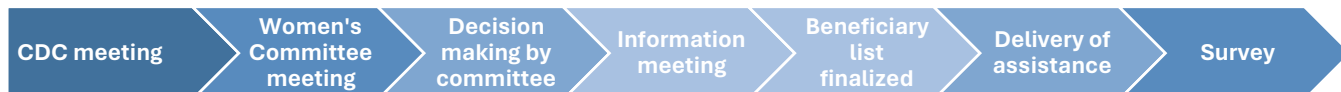
Beneficiary Perspective

Participants had a high level of appreciation for the assistance provided, in particular the durability of the water supply system. Many people highlighted the need for assistance to address underlying vulnerabilities such as better tools for farming or training to diversify livelihoods given the continuous cycle of crop loss due to flooding. People also highlighted the need to build more flood and storm-resistant homes (metal roofs, cement floors) to reduce the impact of future events.

Credit: CADENA, Guatemala

Key Take-Aways

- Existing community structures are not always representative of the affected population and they may not always share the same perspective on the type of assistance that is required.
- Balance engaging with official structures, with specific outreach to beneficiaries from different population sub-groups to cross-check how "represented" they are by community structures.
- The communication profile of the affected population can vary with different levels of literacy or languages requiring diverse communication channels. Reliance on community members or one staff member as translators can create bottlenecks in the flow of information. Ensure a balance in channels that are in-person with those that are accessible from a distance.