POLICY PAPER

PRINCIPLE 6 OF THE GOOD HUMANITARIAN DONORSHIP INITIATIVE

“Alllocate humanitarian funding in proportion to needs and on the basis of needs assessments”

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EXECUTIVE SUMMARY

i. Key issues

Beyond its ethical dimension, principle 6 of GHD raises methodological and political issues. Methodologically, there are numerous difficulties, whether they are related to the definition of what the needs are in a given situation, to the access to and timeliness of information, the scarcity of basic data on mortality, morbidity, socio-economic conditions or the disparity between data collection mechanisms, etc. As a result, it is difficult for donors to have an objective evidence-based understanding of the situations in order to establish priorities and allocate funds. In recent years this first difficulty has been the subject of a large number of studies looking at needs assessment methods (SMART, NAF ...). Yet, many of the above mentioned studies have come to similar conclusions, namely that ‘Needs assessment often plays only a marginal role in the decision-making of agencies and donors’\(^2\): Where is the problem?

There is a risk however in concentrating too much on the technical aspects of the initial need assessment. Other key issues, such as the appraisal of the existing capacities and coping mechanisms in place, as well as the evolving nature of needs, are in danger of being overlooked. In addition, there is a need for a more systemic approach which looks at the whole funding process, from the needs assessment to the final report on how funds have been used and what is the impact of the assistance. Only then will it be possible to get a more global understanding of the difficulties of applying principle 6 of GHD and the risks of deviating from it. This study therefore proposes to analyse the different steps involved in the funding of humanitarian aid and the different ‘critical points’ which can affect its allocation in relation to needs.

However, to dissect the resource allocation process in humanitarian aid, there is one variable of particular importance, namely the difference existing within the donors family and the specific ways each of these donors functions. Although the final objective of Principle N°6 is that the cumulated funds from donors cover the needs globally, this collective responsibility is dependent on the responsible and differentiated application of this principle by each donor. Therefore this document suggest that rather than looking at the donor community as an homogenous body, it is more relevant to refer to a donor typology in order to define the areas of responsibility of different types of donor in allocating funds in proportion to needs.

In addition, needs assessments and the following allocation of funds depend greatly on the type of disaster with which international actors and different types of donor are confronted: issues of knowledge and speed of fund allocation vary a great deal depending on whether one is faced with a sudden and violent crisis, a slow-onset and predictable crisis or a long-term and ongoing crisis. It makes no sense, therefore, to adopt a ‘one size fits all’ approach. It is necessary to prioritise between different crises and between sectors and actors within each crisis. This will involve using a wide variety of tools and criteria. Here, in particular, priorities should be established and available resources should be distributed based on the comparative advantage of each donor rather than on a uniform mechanism.

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ii. Recommendations by type of donor:

1. ‘Multilateral donors’ should support operational actors in their capacity to base their operations on needs assessments and should encourage needs assessments to be carried out. Evaluations should focus on the operator’s capacity to respond to people’s real needs rather than the extent to which operations conform to what was originally decided.

2. ‘Operational donors’ need to have the technical and methodological capacity to carry out a comprehensive needs assessment which allows a quality response which corresponds to real needs.

3. ‘Cash dispenser donors’ should consider contributing to the needs assessments, perhaps retroactively, at the beginning and during operations. These need assessments can rarely be included in the funding documents and therefore, while crucially important, are often done with minimal investment from the aid agencies. Situation assessment documents could eventually be made public. This would encourage assessments to be carried out systematically and exchanged between operational actors. In order to remain faithful to humanitarian principles, mechanisms need to be found to manage political and media pressure.

4. ‘Partner donors’ need to be able to share their own needs assessments with operational actors and need to ensure that there is coherence between the macro and micro levels of analysis while guaranteeing the independence and impartiality of actors. This means that in addition to the donor’s own assessments, proper diagnosis by aid operators need to be supported and there needs to be acceptance that this will lead to discussion of different options.

iii. Recommendations by stage of the funding process

- Needs assessment:

5. At the needs assessment stage, the involvement of local authorities and populations needs to be guaranteed and participatory approaches need to be given priority as early as possible. There needs to be acceptance that participatory approaches are somewhat unpredictable. They can lead to the identification of unexpected needs which may not fall within pre-established standards.

6. A multi-disciplinary approach is needed at this crucially important stage. As far as possible, it should be conducted by mixed teams made up of individuals from different organisations in order to counter any ‘offer-driven’ bias.

7. As such, humanitarian needs assessments should no longer be a simple data collection exercise but rather an analysis of vulnerabilities and risks based on the reading of situations on various levels.

8. Adapting to changes in the nature and scope of needs as situations change is a vitally important issue for humanitarian action, both for crises which become sustained once the initial emergency phase has passed and for the complex process involved on the protected and fragile path to crisis resolution.

9. There is an urgent need to be more receptive to early warning indicators so that mitigation strategies, which cost much less, both in terms of suffering and financially, can be implemented as soon as possible.

10. Finally, the quality of needs assessments available should not lead to under-funding of situations where needs assessments are more difficult to carry out (Chechnya versus the Tsunami).
The estimation of resources needed

11. It would be useful to establish a mechanism to monitor the transfer of private funds, including those from the Diasporas, in response to a crisis in real time so that public funds could complement these where necessary or could be re-allocated to situations where needs are not covered to the same extent.

12. The influence of the media is such on this issue of funding in relation to needs that the role of the media has to be a part of any thinking about GHD. An innovative strategy to improve collaboration between the media, humanitarian actors, donors and beneficiaries might include mechanisms to ensure that forgotten crises are given better media coverage, support to local media and more care in the way 'victims' are presented.

14. Although it has been tried several times, there is no mathematical formula to calculate the cost of a response to given needs which would allow the cost of different crises to be meaningfully compared. The risk of incorrect interpretations and related wrong allocations is very high. Calculating necessary resources, like assessing needs, is a context-specific exercise.

The allocation of funds

15. As humanitarian needs fluctuate from one year to another, it is important to ensure that a up front funding be available in a predictable manner for the response to the situations arising from protracted crises, where needs are often known in advance. In case of large emergency or when the multiplication of small to medium scale crises overwhelms the planned level of resources, donors have to be ready to mobilise extra resources. Contingency funds are by essence at the core of the responsiveness of the resource mobilisation and of the timeliness of the operations.

16. The suggestion made by the GHDI to create a framework within which funds are allocated in a manner which is transparent with regard to assumptions made, information sources and selection criteria... and which is open to public scrutiny, seems to be an excellent step forwards in the direction of more accountable decisions on resource allocations.

17. It is essential that fund allocations are protected from temptations to make aid conditional, to instrumentalize it for political or media purposes. To do this, the founding principles of humanitarian aid, i.e; independence, impartiality, neutrality, should be made more widely known amongst donor agencies and those having an influence on them, especially politicians, members of parliament and the general public.

Monitoring and evaluation mechanisms;

18. As need are often evolving, donors should allow or encourage assessments to be regularly updated (perhaps with an ad-hoc budget for this purpose), so that projects can be readjusted. The concept of Humanitarian Aid Observatories, can be further developed

19. Evaluations should not just be about checking that a project conforms to pre-established standards but should systematically assess the response to people’s needs and should use participatory methods.

20. Effectiveness and efficiency alone are not enough to decide whether funding has been appropriate or not. It is necessary to take into account a variety of criteria, including the existence/persistence of humanitarian needs. As such, Principle 6 of GHD could be an appropriate evaluation criterion.

21. If donors want to guarantee the pertinence of their funding, they should support field learning and go beyond “accountability” and move towards “the responsibility to deliver quality”. It is important that they support strategic analysis and regular evaluation of aid during the implementation of projects.

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3 Such as AREU in Afghanistan or other types of observatories and similar approaches including those tested by Groupe URD in different contexts (Central America after Hurricane Mitch, Afghanistan, Golf of Guinea and currently bein set up in Chad)
1. Introduction to principle 6 of GHD or the “humanitarian lottery”.

In 2006 ECOSOC published the following lines: “Such downward trends [gross inequities in the way humanitarian funds are raised and applied] are threatening the viability of humanitarian activities as humanitarian organizations have commitments and obligations that they are unable to underwrite. The chronic underfunding of certain sectors has also led to the erosion of capacity and a decline in the quality of assistance. Humanitarian aid flows are imbalanced for a variety of reasons: lack of media profile, strategic/economic interests, weak political will, differences in social values or a perception by donors that their contributions will be squandered. Whatever the motive, the result is a “humanitarian lottery”.

It is worrying that the word ‘lottery’ was used again in the same year by Mukesh Kapila, the former head of DFID’s humanitarian aid unit in the International Federation of the Red Cross’s World Disaster Report 2006: “Despite the rhetoric on good donorship and the mushrooming of the international aid reform industry, millions remain consigned to the shadows of unfashionable crises and disasters. For them, every day is a lottery to live or die.”

It was largely to respond to this situation that the principles of Good Humanitarian Donorship were drawn up, and particularly principle 6, which is at the heart of GHD as a whole. It is the operational translation for donors of humanitarian principles (principle 2 of the GHDI). Indeed, only if the response is in proportion to needs can humanitarian action be guided by the principles of humanity (saving lives and alleviating suffering wherever it takes place), impartiality (which implies that humanitarian assistance should be provided based on needs alone, without discrimination), neutrality (without taking sides) and independence (which means that humanitarian objectives should be independent of any political, economic, military or other objectives). This ethical dimension is also stated in the European Consensus on Humanitarian Aid: “The assessment of the needs should in all cases be the foundation stone of the humanitarian programme. This refers to the humanitarian principles of impartiality, neutrality and independence from any political, economic or religious agenda, including the foreign policy of any government or group of Governments”.

However, with current changes in the global situation and those to come due to the impact of climate change and the global food and economic crises, humanitarian needs will probably continue to grow. And in contrast to the 0.7% of GDP which has been fixed as the norm for development aid, budgets for humanitarian aid vary from one year to the next. Humanitarian aid should therefore be fixed in relation to needs as stipulated in principle 6 of the GHDI: ‘Allocate funding in proportion to needs and on the basis of needs assessments’.

This document is in three parts. In the first, the various issues linked to the application of principle 6 are analysed with regard to different types of donor. The difficulties involved in allocating funding in proportion to needs vary depending on whether we consider ‘multilateral’, ‘cash-dispenser’, ‘operational’ or ‘partner’ donors.

In the second part, the funding process is dissected in order to identify the critical points which need to be managed to guarantee that funding is allocated in proportion to needs. From the initial situation assessment up to monitoring and evaluation mechanisms, a great number of risks can be identified. In doing so, they can then be managed more effectively.

Finally, part three looks at the respective place of collective and individual responsibility in order to outline possible ways in which principle 6 of the GHDI could be applied and evaluated more effectively.
2. Different issues for different donors

2.1. Processes involved

Needs assessments are rarely carried out by donors, who therefore use those that have been carried out by operators (local authorities, NGOs, specialised bodies, etc.). The effective application of GHD principle 6 is dependent on how the assessment of the needs made by humanitarian actors affects and is affected by the funding process implemented by donors.

It therefore seems necessary to look at the different types of actors and different types of donor interact in relation to sharing assessment and allocating resources, and first to establish a typology of donors (see following paragraphs) in relation to the way they assess situations and needs, and consecutively allocate funds. Certain donors do their own needs assessments. Others only use needs assessments which have been carried out by operators. Some allocate up front funding at the beginning of the year; some are more “choosy” and earmark their contributions to specific crises or sectors. The relationship between donors and actors is not always simple or fixed. Some donors choose to be part of one group of the typology in a given situation and to another when it is felt more appropriate. They can be multifaceted, covering different options and changing strategy depending on the stage of the crisis. For example, some adopt a ‘multilateral’ approach at the beginning, when the situation is very bad, and later shift to a ‘cash dispenser’ approach when issues of image and bilateral policy become relevant. It is therefore necessary to establish a typology of donors for a better understanding of the different relations between donors and operators and a better application of principle 6.

2.2. The ‘multilateral’ donor

This type of donor has a policy of supporting a more or less established number of multilateral actors, essentially UN agencies and the International Red Cross and Red Crescent Movement (essentially the ICRC). Donors of this kind have tended to chanel the majority of their funds to the Consolidated Appeals Programme (CAP) and for a certain time now, to the Central Emergency Response Fund (CERF) or the Common Humanitarian Funds. This choice of allocating funds without clearly targeting them via UN mechanisms can be made for several reasons. It can be a political choice, it can be because the donor has full confidence in the institution or it can be a pragmatic choice which allows funds to be laid out with the lowest possible transaction costs for the donor. The biggest difficulty for this type of donor with regard to applying principle 6 is that they do not have access to a great deal of information which would allow them to check that funds were being allocated in proportion to needs. In effect, the donor delegates their responsibility to the operator and the whole system then depends on the quality of assessments carried out by operators as well as the confidence between donors and actors. This type of funding has the advantage of allowing allocation choices to be made without interference in the form of domestic political pressure or attempts by certain donors to gain visibility.
2.3. The ‘operational’ donor

At the other end of the spectrum are ‘operational’ donors, who are themselves operators. In certain cases, particularly in large scale natural disaster contexts or in complex crises with major logistical constraints, these donors, who are part of the apparatus of a state, will deploy non-financial resources, particularly Civil Protection – firefighters, dog brigades or armed forces. In such cases these donors produce and use their own assessments, which often have to be produced in a very short space of time. In certain cases, such as the special case of an occupying power (the USA in Iraq, Israel in certain Palestine territories), covering the needs of the population is a legal obligation (4th Geneva Convention of 1949).

2.4. The ‘cash dispensor’ donor

‘Cash dispensor’ donors establish budgets and allocate them in response to project proposals they receive. They fund UN, Red Cross and NGO projects. Transaction costs are higher because the project proposal dossiers that they receive need to be dealt with. The forms of ‘Cash dispensor’ donors generally ask for some explanation of needs (nature, origins, etc.) but actors are rarely asked for needs assessment documents and it is even rarer for needs assessments to be funded. These donors sometimes operate on the basis of ‘calls for proposals’, which implies previous knowledge of the situation and of needs. The issue here is how the diagnosis has been established (method, etc.). This kind of donor can be very influenced by the ‘CNN effect’, because they function in response to pressure from public opinion and political decisions. Furthermore, there is a risk of scattering resources without an overall strategy.

2.5. The ‘partner’ donor

‘Partner’ donors establish their own political, technical and operational strategy on the basis of their own assessment and monitoring of a situation. They select the projects that they intend to fund ‘on the basis of evidence’. This is only possible if they are well-informed about the situation and this, in turn, depends on their presence in the field (ECHO TA, DART, DFID humanitarian attachés, etc.) and the ability to send competent and experienced staff into the field. The legitimacy that they gain from having representatives in the field allows them to lobby their governments to obtain the necessary resources. However, the decentralisation of analysis and decisions in the field make this kind of funding more sensitive to local political pressure. Another risk is that operators are seen more and more as ‘implementing’ agencies. This sometimes leads to ‘partner donors’ not fulfilling their responsibility to carry out their own independent needs analyses.

2.6. The multiple nature of the donors

It is of course important to state again that one donor can have different facets and behaviours and be, in one context, showing all the signs of being from one category, and in another one characteristics one another. The same donor can even show different facets depending on the type of agency to support. Yet, the above presented typology can be used usefully to compare the donors and their different faces.
### Different issue to consider for different donors

<table>
<thead>
<tr>
<th>Description</th>
<th>Multilateral donor</th>
<th>Cash dispenser donor</th>
<th>Partner donor</th>
<th>Operational donor</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>How funding is distributed</strong></td>
<td>Distributes funds to large international institutions (UN agencies and Red Cross movement) or to multilateral funding mechanisms (CERF, CHF, ECHO).</td>
<td>Finances actors on an individual basis, based on project documents. Little or no field presence.</td>
<td>Decentralised funding by the donor present in the field (ex. ECHO).</td>
<td>Direct operator – provides assistance by civil or military means.</td>
</tr>
</tbody>
</table>

| **Role in relation to needs assessment** | Institutional commitments: partnership agreements or pre-established commitments. | On an individual basis, based on project documents which, in general, are dealt with by the source countries. | On the basis of calls for proposals (or calls for tender) in accordance with the donor’s pre-determined strategy. | - |

| **Opportunities with regard to principle 6** | Needs assessments are delegated to the institutions who receive funding. | Operators are responsible for carrying out needs assessments. It is the donors role to check that projects are based on needs assessments. | Conduct their own needs and situations assessments in addition to (to complement) the evaluation of operators. | Conduct their own needs and situation assessments in order to run their own operations. |

| **Risks/Difficulties with regard to principle 6** | The distribution of funds between different crises is less subject to political issues or considerations of visibility. | Needs assessments can (theoretically) be carried out at the micro level; | Allows a strategic approach to understanding needs and to funding; | Allows a real understanding of needs; In certain cases there is a legal obligation (occupying power) |

| **Critical issues** | Little information is given to donors; It is difficult to account for how the funds are used and to guarantee that they are allocated in proportion to needs; NGO are rarely involved in the choice, and the argument is that they will receive their resources from the multilateral agencies. | Being able to check if the project document is based on an accurate needs assessment. Heavy workload for the selection and management of dossiers; Needs assessments are rarely funded; Risk of spreading assistance too thinly or of not having a strategic approach; Influenced by the “CNN effect” (public opinion or political pressure); | What of the need for operators to understand situations? Sensitivity to local political pressure; The operator becomes an ‘implementing partner’ –the risk of losing independence; | Can be influenced by local political pressure and considerations of donor visibility; |

Support for partners in their capacity to conduct quality needs assessments. Evaluation of partners, particularly with regard to their capacity to respond to needs. The financing of initial situation assessments or ‘rolling assessments’ (in advance or retrospectively); Coordination between donors; Rester cohérent avec les principes humanitaires (notamment l’impartialité) Formation des personnels en charge de la sélection/suivi des projets; Sharing (building?) needs assessments with operators; Allowing/funding needs assessments by operators; Remaining faithful to humanitarian principles.
3. Critical points in the funding process:

Today there is extensive literature on needs assessment methods. While this is a crucial and complex step, it seems useful to look at the question of funding as a whole – a process which includes a number of steps and during which there are a number of critical points\(^4\). This document will only deal with those related to the issue of funding in proportion to needs (principle 6), but the same exercise could be carried out for all GHD principles in order to establish a quality assurance method to guarantee that they are applied throughout the funding process of humanitarian aid.

Should needs assessments be considered independently of the phase of estimating necessary resources, when the allocation of resources is central to donors’ responsibility to apply principle 6? And during implementation, monitoring and evaluation mechanisms also play a role in guaranteeing that funding is allocated in proportion to needs.

The diagram below shows the different phases of the funding process and the major critical points which can compromise the effective application of principle 6 of the GHDI.

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\(^4\) Term used in Quality Assurance: any activity or factor which can and should be tackled to prevent one or more identified risk.
3.1. **Principle 6 and needs assessments**

The question of who should carry out and who is responsible for this crucial step has already been looked at above. Depending on the type of funding this step can be the responsibility of operators, donors or ad-hoc mechanisms. For example, in an emergency situation following a natural disaster, USAID dispatches its Disaster Assessment and Relief Teams (DARTs). These teams are generally made up of very experienced staff from a variety of disciplines who carry out their own needs assessment procedures by zone and establish networks with NGOs, UN agencies, national authorities and armed forces or Civil Protection units if present. This allows them very quickly to establish a picture of the situation and of the needs that exist, to analyse the capacity of actors and to allocate resources as effectively as possible. The UN dispatches its United Nations Disaster Assessment and Coordination (UNDAC) teams. As soon as the post-crisis reconstruction phase begins, the United Nations, in collaboration with the International Financial Institutions, particularly the World Bank, apply an approach that is in the process of being finalized, the integrated planning of reconstruction, on the basis of Post Conflict Assessment and Results-Focused Transitional Frameworks (based on the new “results-based management” approach)\(^5\).

One risk is that there is bias in needs assessments due to an organisation’s specialisation both in terms of service and type of assistance: nutritionists will look for nutritional problems, water engineers will look for Wat San problems. It is very important that donors are able to decipher this form of bias and encourage more holistic approaches which are less guided by agencies own interests.

Different issues emerge and different methods and means are needed depending on the type of crisis and what stage they have reached. So, different approaches need to be adopted depending on whether we are faced with a sudden natural disaster (such as an earthquake or a typhoon) at its height or ten days later, or whether we are faced with a slow onset disaster (drought or flooding) or a long-term conflict. “The short life of humanitarian needs also renders assessment obsolete almost as soon as it is completed.”\(^6\) It is important to accept that we will sometimes be basing our decisions on information that is close to our optimal level of ignorance. However, it is better to be ‘80% right, on time’ than ‘100% right too late’. One consequence of this situation, which has been regularly observed, is that there is a tendency by organisations looking for funding to simplify the needs assessment process, so that it is reduced to collecting a certain amount of quantitative and demographic data without going into the field. In certain extreme cases, proposals are prepared with automated calculation grids using technical data that is not necessarily of any relevance in terms of real needs and the work already being carried out by local actors (DEC, Gujarat Evaluation, 2001).

The complexity of the issue of needs assessment is apparent in the notion of ‘humanitarian needs’, for which there is no universal definition. Depending on the author, humanitarian needs can mean only vital and urgent needs or they can include needs of a more long term nature which are less essential for immediate survival, but which are nonetheless important in many cases. The question of what is and what is not a ‘humanitarian need’ is the subject of debate within the humanitarian sector. An example of this was the discussion about the role of NGOs in the post-Tsunami reconstruction process between MSF, advocating a restrictive vision, and other NGOs who were prepared to take part in reconstruction efforts or to become involved in other types of activity. In a country at war, are educational needs humanitarian needs or should this notion be limited to the provision of basic necessities (food, water and shelter) and basic services (basic and emergency healthcare)? It seems to us that the notion of ‘humanitarian needs’ has relative meaning depending on the pre-crisis situation.

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More than an assessment of needs, what is needed is a holistic analysis of situations, which includes:

- the analysis of situations and how they might evolve;
- the analysis of existing capacities and the role that they play or could play (national authorities, existing basic services, civil society);
- the analysis of the risk of potential negative effects and methods of dealing with them in the short and mid term (resource depletion, conflict between refugees, displaced people and host populations in Eastern Chad, for example).

This approach shows how much needs assessments are part of a detailed political analysis of situations, as described in the Needs Assessment Framework (NAF). Humanitarian actors attempt to understand the roots of the problems: a problem of malnutrition will only be effectively solved if its root causes are understood and the response not only addresses immediate needs (for example, therapeutic nutrition centres or free food distribution), but also avoids new cases of malnutrition (for example, improved access to water, better hygiene and agricultural recovery).

It is important, in this context, to be careful about the ‘dictatorship of numbers’. The involvement of the medical and public health sectors in the early days of humanitarian action and their major role in the sector have meant that the contribution and approach of medical epidemiology and quantitative research have taken precedence over those of social sciences, and particularly those of micro-economics (analysis of the dynamics of decapitalisation), and anthropology (analysis of behaviour, of changes in eating habits, etc.). Donors tend to wait until they have malnutrition figures before reacting because they appear to be scientific (whereas they are often marred with methodological bias) despite the fact that qualitative data about the seriousness of the crisis is already available. The current trend is to concentrate on indicators such as ‘mortality’ or ‘morbidity’, which are slow in highlighting deterioration.

In all situations, numerous biases can enter the collection and analysis of needs. It is important to be aware of these and to manage them as well as possible. Access to zones is often difficult making it impossible to carry out the direct observation and verification which would theoretically be necessary to avoid manipulation and error. The easier it is to access an area where a crisis is happening, the more data, information and assessments there will be. Decision-making is much more difficult in situations where information is rare, assessments are incomplete and the possibility of following guidelines is reduced. It is also important to question the validity of sources and the quality of data. In emergency and crisis situations, it is relatively rare to have base-line data about the population and the figures that circulate are often extrapolated and should be taken as such.

### 3.2. Principle 6 and the estimation of necessary resources

When estimating necessary resources, one piece of data which should be taken into account over and above needs themselves is the level of resources provided by other actors such as:

- local authorities,
- the general public,
- religious charities (Christian, Islamic)
- other donors, including ‘new’ donors (China, U.A.E.) or ‘non-conventional’ donors (private sector, specific well organised groups such as Hezbollah).

Though the monitoring of public funds provided by state bodies is relatively well organised today by OCHA’s Financial Tracking Services, private donations and resources coming from the non-conventional donors (States and non-state) are much more complicated to monitor.

The role of the media is fundamental in the flow of private funds. What came out of the 23rd ALNAP biannual on ‘News media and Humanitarian Aid’ was that the relations between the media and humanitarian actors are complex and have an enormous impact on whether public and private funding is allocated in proportion to needs.
"Such is the power of the media that according to the Tsunami Evaluation Coalition, a total of $13.5 billion was raised ($5.5 billion from the general public) amounting to over $7,100 for each affected person. This contrasts starkly with only $3 per head donated in response to the Bangladesh floods in 2004. At the same time in Africa, over 3 million people were affected by protracted drought and locust swarms but a UN appeal for just $16 million attracted only a fifth of the funds 2 months after being launched (World Disasters Report 2005). What this suggests is that emergency relief is often given not on the basis of need, but in response to political pressures, media coverage and what aid agencies think might be popular with donors and the general public (The Hindu, 2006)”.

What is more, in this specific example, one must also add that the 16 million dollars mentioned (for the Consolidated Appeals Process for Niger) were collected in only 2 weeks, just after a series of reports by the BBC on the famine in Niger during July 2005.

In addition, the arrival of new public donors (Gulf States) and new private donors (charitable NGOs linked to Islam, Diasporas) has brought a new dimension: the aid which is provided through these channels in Somalia, for example, is no doubt greater than that from classic international aid. But, as yet, there is no international mechanism to deal with this flow of funds or to monitor it in real time. Though, in certain cases, the funds involved are greater in amount and faster than classic funding, they do not follow the classic stages of the project cycle. “The traditional needs assessment approach, which looks at pre-determined types of intervention (food, shelter, water), often through rapid quantitative surveys, is unlikely to convey the importance of remittances.”

Furthermore, estimating funds in relation to needs is necessarily a context-specific exercise: responding to the same needs with two different strategies or in two different situations would result in completely different costs. To reach displaced populations in the Choco of Colombia, several hours away by boat, the logistical costs are necessarily higher than to reach displaced people in a city. In the same way, the cost of a preventative response to early warning signals is considered to be 7 times cheaper than a late response when humanitarian needs have already appeared. And finally, the use of local resources should be privileged as they are often less expensive and are a means of supporting the local economy.

3.3. Principle 6 and the allocation of resources

In contrast to the preceding phases (needs assessment and estimation of the level of resources necessary to respond to them) where responsibility fluctuates between the operator and the donor depending on the type of donor (see part one), the allocation of resources is a central element of a donor’s responsibility.

There are here four key parameters:

- The first of these responsibilities is to have the resources available to be able to respond to humanitarian needs. Though certain nations are very generous and provide considerable funds for humanitarian action, this can not be said of other nations who provide very little in relation to their GDP.
- The second is how to allocate resources to different crises when donors and aid actors have only a limited visibility of what will happen during a set time frame. In many cases, funds are allocated on a “first come, first served” basis, whether this is between different crises or between different actors. Crises which take place towards the end of a budget cycle are often under-funded, except if some left-over funds can be scraped together or if there is a budgetary reserve system which makes it possible to rebuild humanitarian budgets when they have all been used up.
- The third one is whom to target first: Certain categories of victim have high visibility (children, women) and the sectors which reach them are often very attractive and well-funded: nutrition and maternal and child health. Other sectors recieve much less funding despite the importance accorded to them by every observer: support for coping strategies, risk management, etc.

8 Kevin Savage and Paul Harvey, Remittances during crises: implications for humanitarian response HPG, Briefing Paper 26, May 2007
The fourth one is what kind of resource to allocate: food aid in kind, cash, and other types of in-kind commodities? While most agencies would favour receiving cash, as a more flexible resource, some donors have internal regulations that compel them to use in-kind donations.

**Food aid: so necessary and yet so riddled with problems …**

A certain number of crises have shown that food aid can cause dilemmas with regard to the application of principle 6 of the GHDI. In coming crises, food aid may become more necessary yet remain rare because while it is a resource of considerable importance, it is difficult to implement. It is currently used to respond to many different needs even if it is not always the most appropriate response. The triple bias of offer-driven responses, of multiple and complex needs assessments leading to a single form of response and the relative weight of ‘rich’ food aid agencies distort perspectives of allocating resources to respond to other needs. Donors need to address this problem.

It is not always clear how decisions about the allocation of resources are made. Yet this is an area where there is a great deal of pressure and where there are numerous risks of mis-spending. The question of who is in charge of allocation choices, what procedures are applied and the criteria used is at the heart of donors’ responsibility for better application of principle 6 of GHD. Ideally, the method used to allocate resources, the assumptions on which these decisions are based and the justification for funding or not funding an operation should be as transparent and open to public scrutiny as possible. ECHO’s Global Needs Assessment, which clearly identifies the indicators retained and publishes the results of its analyses, is a positive approach which could be replicated, possibly with other indicators or sources of information. It should be clarified whether or not the criterion of geographical and linguistic proximity (often linked to better knowledge of the zone) is included in the selection criteria used by different donors.

The donors involved in the GHDI have established a certain number of principles for a fund allocation framework:

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"Objective – frameworks for allocation should rely to some extent on objectively verifiable data such as mortality rates
Transparent – frameworks should elaborate the methodology behind the allocation in terms of assumptions, underlying data sources, and the rationale for the decisions taken.
Systematic – frameworks should be configured such that different individuals analysing the same situation should come to broadly similar allocation decisions.
Practical/workable – frameworks should involve a level of effort that is realistic to expect decision makers, and those who support them, to actually implement them.
Robust but not rigid – providing guidance but not constraining professional judgement.
Strategic – providing an integrated, high level picture of the situation that can be used to compare different crises."
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In some cases however, the limitation in the level of resources allocated is neither the magnitude of needs nor the knowledge of it. It might be the level of implementation capacity. In large part of Central and South Somalia for instance, the key problem encountered by donors is the limited presence of NGO and other agencies present in the field and able to absorb more resources and deliver.

Clarifying the criteria used for making choices about priorities is probably the only way to counteract political pressure which can be exerted in a more or less explicit manner... Indeed, though humanitarian aid should not be explicitly tied to any conditions, it is also well-known that it is the subject of considerable political pressure. Whether this is at a local level where electoral issues can influence the attribution of aid or at an international level where peace process negotiations can take precedence over needs assessments, there are serious risks that the humanitarian principles of impartiality, independence and neutrality will be compromised... The integrated approach of the United Nations, in which humanitarian aid is considered to be another crisis management instrument alongside diplomatic and military approaches, only increases the risk that aid will be used for political ends, even if this is to promote peace…
In the end, if one wants to guarantee that resources will be allocated where there are the most pressing needs, it is necessary to raise awareness of humanitarian principles beyond the narrow circle of ‘professional’ humanitarians. Politicians and the general public could become the guarantors for the application of a certain number of principles such as impartiality and funding in proportion to needs. The Canadian International Development Agency (CIDA) has decided to run a project to inform politicians in order to strengthen the application of principle 6 of the GHD. As well as establishing a league-table of donors, DARA’s Humanitarian Index aims to improve the application of GHD principles through greater public awareness.

3.4. Principle 6 and monitoring and evaluation mechanisms

Due to the volatility of situations and the pressure in terms of time, access to resources and data, etc. in an emergency, it is absolutely essential that needs assessments are regularly updated and made more detailed. Adapting to changes in the nature and scale of needs as situations themselves change is one of the most important issues involved in humanitarian action, both with regard to crises which become sustained after the emergency has reached a peak and also the more complex processes on the path towards crisis resolution.

This updating of knowledge and understanding should come with the possibility to change and readjust projects. The application of principle 6 of GHD depends on donors accepting real flexibility in funding contracts.

It is vital that evaluations systematically look at the capacity to respond to the real needs of people. Evaluations which are only based on project documents (for example, checking whether the operation complies with the logical framework) or on the verification of compliance with pre-established standards to be reached do not make it possible to check the extent to which the real needs of the population were met. This can only be done using participatory approaches.

There is a risk in this type of evaluation that the effectiveness of aid remains unproven, or worse, is questioned. When donors feel that their contributions have not permitted a situation to improve significantly and that people have remained in a precarious situation despite the actions carried out, may lead at best to them comparing ‘cost effectiveness’ of different programmes and choosing what the feel we be of “good value for money” approach or, at worse, to ‘donor fatigue’. The principle of ‘cost effectiveness’ which governs the allocation of funds for certain public policies should only be applied with a lot of care to humanitarian aid. Though the pursuit of effectiveness remains essential, is it acceptable to stop providing funds in proportion to needs in certain zones because the number of ‘beneficiaries’ continues to rise? Or, on the contrary, does such a situation not justify greater funding? What does effectiveness mean in relation to humanitarian funding? Such considerations show the limits of a results-based approach… and the importance of taking into account a large number of criteria to evaluate the quality of aid.

In complex situations (durable conflicts) or in those which might need major readjustments (after natural disasters), evaluations should be carried out before the end of operations. One of the key elements in the Terms of Reference should be to check on how needs have been indentified and how has this process be regularly updated. The second key component of these intermediary or real time evaluation should be to verify how the project responds not only to needs, but also to the requirements to properly use local capacities and to support local coping mechanisms. Then, resource allocation will have to consider the laters, not only the needs.
4. Conclusion: Individual responsibility of donors within the framework of the GHD1.

4.1. Collective responsibility or individual responsibilities?

For a number of years it has become common to consider humanitarian actors as part of a ‘community’ and that decisions concerning humanitarian issues should be made collectively in our globalised society. In one sense, it is true that an organisation cannot carry out operations independently of the other organisations present in a given environment. The number of operational organisations has grown steadily in recent years and the impact that each of these can have is partly dependent on the effectiveness of the other organisations. An NGO will only be able to reduce levels of malnutrition by opening a nutrition centre if another body such as the WFP takes care of general food distribution in the zone. And the extent to which the WFP can fulfil its mandate is dependent on the means it has been given by donors. And it would not be possible for any individual donor, no matter how big, to resolve the problem of funding in proportion to needs on their own.

But does this interdependence mean that there is collective responsibility? We feel that there is a risk of drowning individual responsibilities in the maelstrom of collective responsibility. References to “the world” in all these official declarations are singular and revealing. Thus, aid sector decision-makers and political leaders are no longer responsible for the actions to be carried out, but a huge mass of people with no precise identity. By making “the world” responsible for an emergency intervention, this removes any kind of individual or institutional responsibility.

For this reason, there is an urgent need for GHD1 donors to embrace principle 6 and the other GHD1 principles on an individual basis. It would be of great benefit if each of them at their own level adopted mechanisms for managing critical points and evaluating the application of these principles.

But this implies greater coordination beforehand for the definition of operational frameworks and the sharing of situation and needs assessments and strategies for supporting local actors if necessary.

The diversity of donors can be made a strength if mechanisms are adopted which enhance the strategic utilisation of comparative advantages of different donors within a concerted framework. The response to needs connected to the multiplication of crises should be organised collectively, taking into account the diversity of practices and optimizing value added, not by levelling donor practices.

9 p. 137, Kent Glenzer in « Niger 2005 : une catastrophe si naturelle » (author’s translation from the French)
4.2. Recommendations

4.2.1. Recommendations by type of donor

1. ‘Multilateral donors’ should support operational actors in their capacity to base their operations on needs assessments and should encourage needs assessments to be carried out. Evaluations should focus on the operator’s capacity to respond to people’s real needs rather than the extent to which operations conform to what was originally decided.

2. ‘Operational donors’ need to have the technical and methodological capacity to carry out a comprehensive needs assessment which allows a quality response which corresponds to real needs.

3. ‘Cash dispenser donors’ should consider contributing to the needs assessments, perhaps retroactively, at the beginning and during operations. These need assessments can rarely be included in the funding documents and therefore, while crucially important, are often done with minimal investment from the aid agencies. Situation assessment documents could eventually be made public. This would encourage assessments to be carried out systematically and exchanged between operational actors. In order to remain faithful to humanitarian principles, mechanisms need to be found to manage political and media pressure.

4. ‘Partner donors’ need to be able to share their own needs assessments with operational actors and need to ensure that there is coherence between the macro and micro levels of analysis while guaranteeing the independence and impartiality of actors. This means that in addition to the donor’s own assessments, proper diagnosis by aid operators need to be supported and there needs to be acceptance that this will lead to discussion of different options.

4.2.3. Recommendations by stage of the funding process

- Needs assessment:

5. At the needs assessment stage, the involvement of local authorities and populations needs to be guaranteed and participatory approaches need to be given priority as early as possible. There needs to be acceptance that participatory approaches are somewhat unpredictable. They can lead to the identification of unexpected needs which may not fall within pre-established standards.

6. A multi-disciplinary approach is needed at this crucially important stage. As far as possible, it should be conducted by mixed teams made up of individuals from different organisations in order to counter any ‘offer-driven’ bias.

7. As such, humanitarian needs assessments should no longer be a simple data collection exercise but rather an analysis of vulnerabilities and risks based on the reading of situations on various levels.

8. Adapting to changes in the nature and scope of needs as situations change is a vitally important issue for humanitarian action, both for crises which become sustained once the initial emergency phase has passed and for the complex process involved on the protacted and fragile path to crisis resolution.

9. There is an urgent need to be more receptive to early warning indicators so that mitigation strategies, which cost much less, both in terms of suffering and financially, can be implemented as soon as possible.

10. Finally, the quality of needs assessments available should not lead to under-funding of situations where needs assessments are more difficult to carry out (Chechnya versus the Tsunami).
The estimation of resources needed

11. It would be useful to establish a mechanism to monitor the transfer of private funds, including those from the Diasporas, in response to a crisis in real time so that public funds could complement these where necessary or could be re-allocated to situations where needs are not covered to the same extent.

12. The influence of the media is such on this issue of funding in relation to needs that the role of the media has to be a part of any thinking about GHD. An innovative strategy to improve collaboration between the media, humanitarian actors, donors and beneficiaries might include mechanisms to ensure that forgotten crises are given better media coverage, support to local media and more care in the way ‘victims’ are presented.

14. Although it has been tried several time, there is no mathematical formula to calculate the cost of a response to given needs which would allow the cost of different crises to be meaningfully compared. The risk of incorrect interpretations and related wrong allocations is very high. Calculating necessary resources, like assessing needs, is a context-specific exercise.

The allocation of funding

15. As humanitarian needs fluctuate from one year to another, it is important to ensure that a up front funding be available in a predictable manner for the response to the situations arising from protracted crises, where needs are often known in advance. In case of large emergency or when the multiplication of small to medium scale crises overwhelms the planned level of resources, donors have to be ready to mobilise extra resources. Contingency funds are by essence at the core of the responsiveness of the resource mobilisation and of the timeliness of the operations.

16. The suggestion made by the GHDI to create a framework within which funds are allocated in a manner which is transparent with regard to assumptions made, information sources and selection criteria... and which is open to public scrutiny, seems to be an excellent step forwards in the direction of more accountable decisions on resource allocations.

17. It is essential that fund allocations are protected from temptations to make aid conditional, to instrumentalize it for political or media purposes. To do this, the founding principles of humanitarian aid, i.e; independence, impartiality, neutrality, should be made more widely known amongst donor agencies and those having an influence on them, especially politicians, members of parliament and the general public.

Monitoring and evaluation mechanisms;

18. As need are often evolving, donors should allow or encourage assessments to be regularly updated (perhaps with an ad-hoc budget for this purpose), so that projects can be readjusted. The concept of Humanitarian Aid Observatories\textsuperscript{10}, can be further developed

19. Evaluations should not just be about checking that a project conforms to pre-established standards but should systematically assess the response to people’s needs and should use participatory methods.

20. Effectiveness and efficiency alone are not enough to decide whether funding has been appropriate or not. It is necessary to take into account a variety of criteria, including the existence/persistence of humanitarian needs. As such, Principle 6 of GHD could be an appropriate evaluation criterion.

21. If donors want to guarantee the pertinence of their funding, they should support field learning and go beyond “accountability” and move towards “the responsibility to deliver quality”. It is important that they support strategic analysis and regular evaluation of aid during the implementation of projects.

\textsuperscript{10} Such as AREU in Afghanistan or other types of observatories and similar approaches including those tested by Groupe URD in different contexts (Central America after Hurricane Mitch, Afghanistan, Golf of Guinea and currently bein set up in Chad)
4.3. Identification of possible indicators to monitor the use of Principe 6

The monitoring and evaluation mechanisms developed by Development Initiative for the GHD principles are mainly based on collective indicators (indicators which are aimed at the donor community as a whole). While these are useful for analysing the overall performance of all the resources mobilised, it is difficult to disaggregate them and to analyse them by donor. This lower level of analysis nevertheless seems necessary, and requires a specific set of criteria and indicators in order to evaluate the capacity of individual donors to comply with the GHDI principles. While DARA’s innovative Humanitarian Response Index has not been well received by many donors, largely due to communication and methodological issues, it seems essential to analyse individual donor behaviour. The recent move by OECD DAC to include humanitarian funding in the peer review process is most welcome.

Below is an example of a set of collective and individual indicators which could be used to assess how well principle 6 is being applied:

→ The gap between needs covered by humanitarian funding and overall needs:

Collective: Existence of underfinanced needs or underfinanced humanitarian crises
Level of collective response to the CAP, by crisis and by sector;
Individual: Relation between funding allocated and ECHO’s vulnerability index

→ Fund allocations are based on needs assessments
Collective: The frequency with which the NAF is used
Individual: Percentage of the funds used for needs assessments (initial diagnosis and rolling diagnosis)

→ Humanitarian aid is independent of any military, political and visibility objectives
Collective: Percentage of the funds allocated on a bilateral basis
Individual: Existence of a humanitarian strategy which clearly advocates adhering to Humanitarian Principles
Perception of the impartiality of fund allocations

→ Funding mechanisms allow funds to be reallocated in response to changing situations and changing needs
Collective: Support RTE type mechanisms and the creation of Humanitarian Aid Observatories and allow for decentralised decision-making.
Individual: Existence of easy-to-use procedures to re-allocate resources in response to changing situations and needs

→ The low coverage of certain needs/crises is clearly explained
Collective: Effectiveness of multi-donor coordination to limit this type of situation and arguments can be presented to explain the remaining cases
Individual: Existence of arguments to justify low or non funding of a crisis, a sector or certain types of needs.
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