
Part II: Meeting the requirements of the HAP Standard

2. Qualifying norms for Certification	12
Qualifying norm 1: Impartiality	13
Qualifying norm 2: Not-for-profit status	15
Qualifying norm 3: Financial accountability	17
Qualifying norm 4: Humanitarian accountability framework	19
3. The Humanitarian Accountability Covenant	30
The HAP Principles for Humanitarian Action	31
Declaration of additional interests	37
Working with humanitarian partners	39
4. Benchmarks for the HAP Standard	42
Links with the humanitarian accountability framework	44
Benchmark 1: Humanitarian quality management system	45
Benchmark 2: Information	55
Benchmark 3: Beneficiary participation and informed consent	64
Benchmark 4: Competent staff	72
Benchmark 5: Complaints-handling	79
Benchmark 6: Continual improvement	88

2. Qualifying norms for Certification

The qualifying norms are four important criteria that agencies must meet before they can apply for HAP Certification. They are: humanitarian impartiality, not-for-profit status, financial accountability, and a publicly available humanitarian accountability framework. An agency that submits an application for Certification will need to demonstrate that it fulfils these qualifying norms (see Annex 1, The HAP Standard 1.3). Each of these is examined below in greater detail.

Qualifying norm 1: Impartiality

Committed to provide humanitarian assistance on an impartial basis.

1. What does impartiality mean?

HAP's principles for humanitarian work are derived mainly from the Fundamental Principles of the Red Cross movement, proclaimed in Vienna in 1965 and the result of a century of work in humanitarian crises. These principles affirm the essential importance of 'humanity', i.e. the belief that all human beings have an inalienable and equal right to live in dignity. Humanitarianism is thus concerned with the prevention and alleviation of human suffering, wherever it occurs, and the right of all persons to receive and give assistance.

Impartiality means providing humanitarian assistance in proportion to need and with respect to urgency, and without discrimination based on gender, age, race, impairment, ethnicity, or nationality, or because of political, religious, cultural, or organisational affiliation. In other words, there should be no social, political, cultural, or religious bias or prejudice in the delivery of aid.

2. Why is impartiality important?

While everyone has an equal moral right to humanitarian assistance, an impartial assessment of needs will invariably identify individuals or groups of people with different survival requirements. Humanitarian agencies must always try to act in an impartial manner so that those most in need are helped first. To achieve this, it is necessary to disaggregate affected populations to ensure that people who are often overlooked or discriminated against (e.g. elderly people, women, children, people with disabilities, minorities) are properly considered when deciding who has the most pressing need for assistance.

However, as political interest in humanitarian aid has grown, the possibilities of its use for political or military purposes have also increased. A military-led protection project intended to win hearts and minds, or relief intended to compensate for the adverse consequences of political loyalty, are unlikely to be consistent with the principle of humanitarian impartiality. Therefore the integration of humanitarian assistance into wider political or military strategy threatens the impartiality of the system for humanitarian aid resource allocation and delivery. In turn, the safety of humanitarian workers is undermined when their actions are not perceived to be impartial.

Because emergency aid that is provided on an impartial basis is the most effective way of saving and protecting lives, the HAP Standard requires that all applicants for Certification have a prior commitment to the principle of impartiality.

3. How will this requirement be assessed?

At the application stage an agency must provide evidence that it is committed to the principle of humanitarian impartiality. This may be found in the organisation's statutes, constitution, charter, or mandate. If no such reference exists, the governing body of the agency will have to make a formal declaration of its commitment to humanitarian impartiality. This could also be incorporated into the agency's humanitarian accountability framework – see qualifying norm 4 below.

Qualifying norm 2: Not-for-profit status

Formally declared as a not-for-profit organisation in the country or countries where it is legally registered and where it conducts humanitarian work.

1. What is a not-for-profit organisation?

A not-for-profit organisation is one that is established for charitable, humanitarian, or educational purposes and which has no intent to make profits from its programme for its staff, members, or any other shareholders/stakeholders. The not-for-profit principle is comparable with the Red Cross principle of ‘voluntary service’, or selflessness. Jean Pictet wrote: *‘In speaking of selflessness, we mean that [the agency] has no interests of its own, or at least that its interests coincide with those of the persons it protects or assists.’*¹ A not-for-profit humanitarian agency is concerned only with the humanitarian interests of the persons who require help. Many countries set their own detailed criteria for what is meant by ‘not-for-profit’, which must be met by organisations wishing to operate on their territory.

2. Why is it important to be a not-for-profit organisation?

A humanitarian organisation, by definition, exists first and foremost to address the suffering of crisis-affected populations. To focus on profits or on political objectives would compromise the ability of an organisation to give assistance in an impartial and humane manner, as its decisions would be affected by its own need to achieve commercial, political, or military goals. Although the profit motive is said to generate efficiency, it is also clear that the humanitarian motive opens doors and attracts voluntary financial and moral support in a manner seldom rivalled by commercial or military organisations. A not-for-profit status may also confer preferential benefits such as tax exemptions, work permits, and other privileges, all of which can confer significant comparative advantages upon not-for-profit agencies.

3. How will this requirement be assessed?

At the application stage, an agency must provide evidence of its registration as a not-for-profit body in its 'home' country and a formal declaration of not-for-profit status in the countries where it conducts humanitarian activities. This will require submission of relevant registration documents given by government authorities, annual accounts, or in exceptional circumstances where no such documents exist, a signed statement by the agency's governing body confirming its not-for-profit status.

Qualifying norm 3: Financial accountability

Complies with the requirements for financial accountability under the law in the country or countries where it is legally registered and where it conducts humanitarian work.

1. What are the financial accountability requirements?

An agency that wishes to achieve compliance with the HAP Standard must be in good financial standing. This is defined as meeting the legal requirements for financial accountability in its country of registration or incorporation, and in the countries where it conducts operations.

2. Why is financial accountability important?

Being accountable is intrinsically linked with being responsible for the efficient and effective use of the resources donated to and managed by the agency. However, in the final analysis, disaster-affected populations bear the true costs of mismanagement, negligence, or corruption. So while it is important for donors, it is genuinely vital for disaster survivors that an agency is accountable for all of its assets.

3. How will this requirement be assessed?

At the application stage, the agency must submit:

- A statement that it meets the legal financial accountability requirements in its 'home' country of incorporation or registration. This information may be found in annual reports or audits.
- Independently audited accounts for the three previous years and, where possible, the current expenditure plan. Independent financial auditing provides some level of guarantee against fraud and misuse of funds, and would be a minimum requirement for HAP to consider Certification.
- A list of current humanitarian programmes (see example in Table 1 below) to enable HAP to understand the size, scale, capacity, and timeframe of programmes in which the agency is engaged.

Table 1: Sample list showing all active operations, with start and end dates and volume indicators

Country Include all programmes in country	Start	End	Partners Name humanitarian implementing partners	Beneficiaries	Staff	Comments Donors, evaluations, audits etc.
South Sudan	24.02.95	Open				
WatSan project in Bor County	01.01.07	31.12.07		10,000	47	
Health programme in Upper Nile	01.05.06	30.09.07		54,000	115	

Qualifying norm 4: Humanitarian accountability framework

Makes a publicly available statement of its humanitarian accountability framework.

1. What is a humanitarian accountability framework?

HAP defines a humanitarian accountability framework as ‘a set of definitions, procedures, and standards that specify how an agency will ensure accountability to its stakeholders. It includes a statement of commitments, a baseline analysis of compliance, and an implementation policy, strategy, or plan’. In short, a humanitarian accountability framework consists of a list of the minimum standards that an agency commits to meeting in its humanitarian work, an implementation plan for achieving these, and an explanation of the means available for stakeholders to hold it to account for these. A branding or marketing strategy is not the same as a humanitarian accountability framework, although it should not be inconsistent with it.

2. Why is a humanitarian accountability framework important?

Stakeholders, whether they are staff, volunteers, customers, clients, intended beneficiaries, or donors, usually like to know what an agency ‘stands for’, what it really believes in, what it considers to matter most when deciding what to do, and how it intends to go about doing it. Answers to these questions are often critical factors for people making a choice about which agency to work for, or which agency to donate to. For people in a crisis, there is an even more crucial concern: can the agency be relied upon to fulfil its pledges? If not, then time spent queuing to register for assistance might be better spent on other survival activities – this is a choice that may literally be a matter of life or death.

A humanitarian accountability framework therefore helps all stakeholders to make better-informed decisions, with more predictable and more desired results. In humanitarian crises, predictability is crucial for enhancing inter-agency co-ordination and improving overall humanitarian outcomes. This is why donors are increasingly

favouring the use of ‘framework partnerships’, and also emphasising the need for a publicly available accountability framework.

3. What should be included in a humanitarian accountability framework?

The humanitarian accountability framework is perhaps the least familiar to aid practitioners of the four qualifying norms set out in the HAP Standard and, as a required component of the HAP Certification application, its preparation may at first sight appear to be a daunting task. However, in practice it should be a straightforward exercise. In the first instance, it is concerned only with identifying and, where appropriate, clarifying the status of, existing commitments made by the agency.

In some cases, particularly with small or new agencies, there may be very few formal commitments in place, either internally developed ones or commitments adopted from external standard-setting bodies. For agencies such as these, links on the HAP website can be used to build up a menu of the better-known humanitarian standards currently on offer. For larger and longer-established agencies, the problem is more likely to be a multitude of commitments, several of which may overlap, some of which may be out of date, and others which may be irrelevant to humanitarian work.

In developing a humanitarian accountability framework, the following guidance may be considered when deciding what should be included or excluded:

- **Relevance:** A humanitarian accountability framework should include only those commitments that are demonstrably linked to the quality and accountability of the agency’s own humanitarian programme. For example, a specialised medical agency would not be advised to make commitments regarding civil engineering standards, and vice versa.
- **Concreteness:** To be useful, an accountability framework should include only commitments that can be verified or

measured by tangible indicators. This does not exclude the use of qualitative concepts such as ‘dignity’ or ‘well-being’, but it does require the identification of an affordable and routinely employed means of monitoring these, such as contact group interviews or opinion surveys.

- **Realism:** The standards to which an agency subscribes should be achievable under ‘normal’ circumstances, i.e. within the competencies and capacity that the agency is usually able to deploy, and which are appropriate to the typical humanitarian context. A humanitarian accountability framework is therefore more likely to include a commitment to minimum standards and less likely to make pledges to deliver state-of-the-art excellence.
- **Attribution:** While humanitarian agencies collectively seek to improve the well-being of those affected by disaster, a humanitarian accountability framework should focus upon verifying the application of established good practices by the agency itself and not upon factors over which it has no control or little influence. However, this does not mean that the framework should only cover internal management processes. For example, it could include co-ordination norms such as the InterAction Field Cooperation Protocol, consultation norms of the kind contained in the Sphere common standards, or advocacy norms such as those set out in the IANGO Charter.
- **Coherence:** Overall, a humanitarian accountability framework should be internally consistent. A lack of coherence might result from the following:
 - **Ambiguous codes, standards, or principles:** A humanitarian accountability framework should provide guidance on what can be expected of an agency, and what will be done if it fails to meet these expectations. However, some of the humanitarian community’s codes, standards, and principles have not been developed for the purpose of accountability, and they sometimes therefore lack measurable indicators or a

consideration of their affordability. Some are written in a purely aspirational mood, with the required commitment defined by imprecise verbs such as ‘strive’, ‘endeavour’, or ‘attempt’. When the commitment does not specify how hard the agency should strive or endeavour, there is great scope for interpretation, negotiation, and resulting incoherence.

- **Overlap:** Standards often cover similar ground but use different definitions, benchmarks, or indicators. For example, staff competencies are referred to in the People in Aid Code, the Compas Qualité, the Sphere common standards, and the HAP Standard. The participation of beneficiaries is referred to in the Compas Qualité, the Red Cross/NGO Code of Conduct, Sphere, and HAP. Before making a commitment to any of these, the agency should itself assess whether different standards are complementary, and which can be included in its framework without creating incoherence.
- **Lack of prioritisation:** The ability to meet commitments is invariably dependent upon a combination of leadership, availability of human and financial resources, and the presence of a conducive environment. Sometimes, even when leadership and context are favourable, a lack of resources may force a difficult choice between quality and quantity objectives, even though meeting both is considered vital for the survival of those affected. In such circumstances, a simple list of commitments does not help in deciding between options. In this sort of situation the humanitarian accountability framework should provide guidance, either by ranking the commitments in order of importance or by setting out a process for dealing with such difficult choices. A simple way to rank an agency’s commitments is to identify which are obligatory, which are formal guidelines, and which are simply aspirational. If the status of a commitment is unclear, the answers to the following three questions may help to ascertain its standing in the organisation:

- At what level in the organisation was it adopted or endorsed? This should indicate its **formal** status.
- Is it monitored and, if so, how is this done? This may demonstrate its **observed** status.
- What are the repercussions for non-compliance? This may reveal its **actual** standing.

Ideally, the formal, observed, and actual status of a commitment should be consistent. Indications that a commitment is not observed should not automatically lead to a conclusion that it ought to be. Rather, it indicates that its status should be reviewed and clarified by the appropriate authority in an organisation.

The humanitarian accountability framework should always be seen as work in progress. It is a document that should be updated often, as an agency clarifies and improves its quality and accountability systems. The humanitarian accountability framework that an agency produces at the very beginning of its journey towards full Certification, when it is making a baseline analysis of compliance and an improvement plan, will almost certainly be different from the framework it submits when it is ready for Certification.

4. How will this requirement be assessed?

At the application stage, the HAP requirement is that a ‘publicly available’ statement of an agency’s humanitarian accountability framework be submitted. ‘Publicly available’ means accessible to the public, including intended beneficiaries and humanitarian partners, e.g. through the Internet, in printed or audiovisual information materials, or on public notice-boards. The HAP Standard ultimately requires that the humanitarian accountability framework is available in ‘languages, formats, and media that are accessible and comprehensible for beneficiaries and specified stakeholders’.

At a minimum, on first application, the agency must submit a statement summarising its humanitarian accountability framework and detailing the following:

Statement of commitments

- List of all standards, codes, guidelines, mandate, principles, charter, etc. to which an agency has committed itself and which are evidently relevant to the quality of its humanitarian programme. These may be internally generated by the agency itself, or developed for collective use by a group of agencies or by a standards-setting body. Standards for collective use might include, for example, the *International Red Cross Movement and NGO Code of Conduct in Disaster Relief*; The Sphere Project's *Humanitarian Charter and Minimum Standards in Disaster Response*; Coordination Sud's *Compas Qualité*, the People In Aid *Code of Good Practice*; InterAction's *PVO Standards*, ACFID's *Code of Conduct*; or the Secretary-General's *Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse*.
- For agencies seeking HAP Certification, commitment to the principles for humanitarian action set out in the HAP Humanitarian Covenant are obligatory.

Baseline analysis

- In order to be able to monitor progress, an agency needs to establish a starting point or current status assessment. This is an essential management tool that allows an agency to identify gaps, strengths, and weaknesses in relation to its accountability and quality management commitments. It will also identify those commitments that the agency is occasionally or consistently unable to meet. Improvement plans can then be drafted to address gaps identified.
- A baseline analysis must be carried out by agencies seeking to be certified against the HAP Standard.
- The baseline analysis may be carried out by the agency itself or by an independent body. In either case, the process should be conducted in a manner that is comparable with the HAP

Certification audit process, as described in Part III of the Guide.

Implementation policy, strategy, or plan

- Once an agency's commitments have been identified and gaps in compliance have been assessed, a quality and accountability standards implementation plan can be developed. This should explain the management arrangements, procedures, and processes that are in place, or will be put in place, to turn the agency's commitments into a reality on the ground. It will include a method of monitoring progress to ensure that the agency is constantly moving forward, and that it is quality-assured. For example, the implementation plan might include:
 - SMART² objectives: building from the baseline analysis, what actions are needed to move towards full compliance?
 - Progress indicators: which indicators will be chosen and how will these be monitored and reported upon?
 - Designation of management responsibilities: who has overall responsibility for the implementation of each specified quality or accountability commitment?
 - Stakeholder communication plan: who needs to know about the commitment and how will they get to know about it?
 - Staff competencies: who needs to be skilled in the application of the specified commitment and how will these competencies be acquired?
 - Knowledge management: how are good practices identified and disseminated?
 - Complaints-handling: how are complaints concerning quality compliance issues addressed in a safe, consistent, and fair manner?
 - Improvement plans: how will the implementation plan and the performance of the staff involved be monitored and evaluated?

5. Will everything in the humanitarian accountability framework be assessed?

HAP Certification is concerned primarily with how an agency complies with the HAP Standard. However, as the humanitarian accountability framework may also make reference to other standards, codes, principles, or policies, the question arises of whether HAP will also assess compliance with these commitments. The answer is broadly ‘no’, although the HAP assessment will seek to ascertain the following:

- Has the agency been definitive and comprehensive in listing those commitments and declaring those interests that are evidently relevant to the quality of its humanitarian programme?
- Has the agency carried out a baseline analysis against all of its commitments?
- Has the agency prepared an implementation plan, strategy, or policy, and defined progress indicators to measure its performance in implementing these commitments?

Apart from where there are coincidental overlaps, a HAP audit will not attempt to assess compliance with other standards, codes, or principles in the rigorous manner that it will audit compliance with the HAP Standard, given that:

- HAP is not the intellectual owner of these other standards and it has no mandate to assess compliance with them.
- HAP may not have the technical knowledge to assess compliance with them.
- The additional complexity and costs of auditing other standards, codes, or principles may be prohibitive.

6. Example of a humanitarian accountability framework pro-forma

A humanitarian accountability framework can take many forms. Most crucially, it must suit the organisation that it is designed for, specifically with regard to the use of specialist language and the names and related acronyms given to specific posts, work groups, policies, and management processes familiar to the agency. However, it must also be made available in versions that are accessible and comprehensible to stakeholders or their designated representatives. The example given in Table 2 shows how an agency's commitments might be mapped, as the first step in developing a humanitarian accountability framework.

Table 2: Example of a pro-forma for a humanitarian accountability framework

Quality and accountability commitments			Baseline analysis		
Commitments	Authority	Obligation	Implementation mechanism	Partner status	Compliance status
Mandate/ charter	Board	Binding	Strategic plan – emergency	Guideline	
Programme quality policy	Programme department	Binding	Quality management system – programme department workplan – emergency response section Budget – adequate	Compliant	
Red Cross/ NGO Code of Conduct	Unknown	Guideline	None	N/A	
Sphere Humanitarian Charter and Minimum Standards	Executive director	Guideline	None	Mixed	
HAP Standard	Executive director	Binding	Humanitarian accountability workplan	Mixed	
People in Aid Code	Human resources director	Binding	Departmental workplan	Good	
Field Co-operation Protocol	Emergencies director	Guideline	None	Unknown	

Implementation plan

SMART objective	Progress indicator	Action
Review corporate quality policy		
Update and streamline quality management system		
Clarify status with IFRC. Review by Programme Department		
Review by Board and, if adopted, include in programme quality policy and implement through quality management system		
Review by Board and, if adopted, include in programme quality policy and implement through quality management system		
Include in Programme Department quality management system		
Clarify status with InterAction		