

ACCOUNTABILITY IN DISASTER RISK FINANCING

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Abstract

As disaster risk financing (DRF) matures, it needs to better understand and implement accountability—particularly towards the at-risk people it seeks to benefit. There is growing awareness of this, but application remains nascent. This working paper presents a framework for understanding accountability in this context, as well as an overview of implementation in order to stimulate and inform progress.

Taking the broad definition of accountability as being answerable to the people affected by decisions and actions—taking *account of* people’s views and being held to *account by* them—the paper examines how this can apply to DRF instruments. While the basic obligation is the same for any form of public finance, the paper explores the salient features of DRF instruments —science-based modelling, ex-ante agreement, and new configurations of stakeholders—that present challenges and opportunities for putting accountability into practice.

Given that specific policy and evidence on this subject are currently very sparse, the paper includes an illustrative review of a wide range of disaster risk retention and transfer instruments. It finds that while examples of, and building blocks for, a practical understanding of accountability do exist, implementation is highly selective and rarely a strategic consideration. However, the paper also finds an emerging desire to address the accountability deficit, driven both by principles and efficacy imperatives. To support future work in this regard, the paper concludes with a series of questions for further evidence, analysis and action, which it is hoped will be catalysts for a new level of intra- and inter-stakeholder attention to accountability.

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About the Centre for Disaster Protection

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● ACRONYMS AND ABBREVIATIONS

ARC	African Risk Capacity	GRiF	Global Risk Financing Facility
ARV	Africa Risk View	HSNP	Hunger Safety Net Programme
BCM	beneficiary contact monitoring	IAIS	International Association of Insurance Supervisors
CARD MBA	Centre for Agriculture and Rural Development Mutual Benefit Association	IBRD	International Bank for Reconstruction and Development
Cat DDO	Catastrophe Deferred Draw Down Option	IDA	International Development Association
CCF	community contingency funds	IFI	International Financial Institution
CdR	caisse de résilience	IFRC	International Federation of Red Cross and Red Crescent Societies
CERF	Central Emergency Response Fund	INTOSAI	International Organization of Supreme Audit Institutions
CISL	University of Cambridge Institute for Sustainability Leadership	MCII	Munich Climate Insurance Initiative
DPL	development policy loan	NDMA	National Drought Management Authority (Kenya)
DREF	Disaster Relief Emergency Fund	NGDI	Next Generation Drought Index
DRF	disaster risk financing	NGO	Non-governmental organisation
DRM	disaster risk management	PEF	Pandemic Emergency Financing Facility
DRR	disaster risk reduction	PSNP	Productive Safety Net Programme
EAP	Early Action Protocol	UNDRR	United Nations Office for Disaster Risk Reduction
FAO	Food and Agriculture Organization	UNFPA	United Nations Population Fund
FbA	Forecast-based Action	UNISDR	United Nations International Strategy for Disaster Risk Reduction
FbAF	Forecast-based Action Fund	WFP	World Food Programme
FbF	forecast-based financing	WHO	World Health Organization
GDP	gross domestic product		
GPSA	Global Partnership for Social Accountability		

1

● THE CASE FOR ACCOUNTABILITY IN DISASTER RISK FINANCING

1.1 Why should disaster risk financing be accountable?

Simply put, accountability is about being answerable for one's decisions and actions. It involves *taking account of*, and being able to be *held to account by*, the people who are affected by those decisions and actions.

It is well understood that disaster risk financing (DRF) instruments, just like any other form of aid and public finance, should be accountable.¹ This accountability is owed to both those who finance the instruments and, fundamentally, to the risk-affected people who should benefit from them. There is a clear rationale for making DRF accountable: it is a rationale grounded in stated principles, social justice, and improved effectiveness.

In terms of stated principles, major DRF actors agree that being accountable is a foundational tenet, reflecting its intrinsic worth and its role in conferring legitimacy. This tenet is formulated in many ways, including in: the InsuResilience Global Partnership's principles, which promote increased end-user ownership (InsuResilience Secretariat, 2019); the World Bank Global Risk Financing Facility (GRiF), which recognises the centrality of inclusive, meaningful civic participation; and the Start Network's description of accountability and transparency as 'non-negotiables' (Harris and Jaime, 2019a).

The case for accountability in DRF is closely tied to questions of aid and justice. DRF is part of the aid sector and there is renewed scrutiny of the roots and legacies of aid in perpetuating power imbalances (see Rutazibwa,

2019; Pailey, 2019). At its most meaningful, accountability involves a recalibration of relationships and redistribution of power (Arnstein, 2019; Anderson, 2019).

The inherent value of accountability is bolstered by the case for effectiveness: the argument that it is not just the right thing to do, but that it also makes for better instruments. It enables institutions to design more relevant approaches and to better identify, address, and learn from shortcomings and errors (Forest, 2018). Accountability is intrinsic to the Centre for Disaster Protection's '7 habits of highly effective DRF', in particular the 'habits' of embedding scrutiny and learning and ensuring participation (Hill and Scott, 2020). Building public engagement and understanding of DRF mechanisms has also been linked to increased community satisfaction and uptake (Van Domelen and Coll-Black, n.d.; Dercon *et al.*, 2014). Accountability generates trust (Ramalingham, 2013), and trust is the bedrock for working with people to reduce their risks. Trust is particularly important in situations of high uncertainty and in experimental interventions where learning from 'failure' needs to be normalised—clear accountability procedures can be a framework for cultivating this trust.

But, despite the clear and far-reaching acceptance of the idea of accountability in DRF, research for this paper revealed a widespread lack of clarity and ambition when it comes to the realities. This is partly due to the fact that energies and attention have been consumed by the basics of establishing these new systems. As DRF now begins to mature beyond its pilot-stage infancy, the agencies and institutions that are driving and delivering DRF

¹ DRF is characterised by upfront analysis of the risk, using predictive tools, and pre-planning and agreement of who will pay out, how, and under what conditions. It involves science-based risk modelling, contingency planning, and pre-positioned financing. This paper focuses on DRF instruments to retain and to transfer risks (see Section 3.1 below).

instruments now need to develop mature expectations around accountability, based on a clear-sighted and considered understanding of its concepts, complexities, and challenges.

As a high-profile, fast-evolving, and innovative sector, DRF could be well positioned to do this. The imperatives of innovation set a high bar for instruments to prove their worth—often higher than existing modalities—and this offers the opportunity for DRF actors to become exemplars of accountability. At its best, innovation also presents the chance to question and reinvent ways of working, and potentially to challenge entrenched structures and incentives that stymie accountability elsewhere.

1.2 Scope and approach of this paper

This working paper seeks to support the emerging awareness that the DRF sector needs to better understand and implement accountability—and specifically accountability to the at-risk people it exists to benefit.

The paper aims to begin to fill the evident gap in thinking about accountability, as well as the evidence gap documenting where and how it is, and could be, put into practice. It is deliberately framed as a working paper, providing a first step rather than the definitive word—a catalyst and common starting point for a collaborative process of developing a shared vocabulary and commitment to accountability.

The focus of this paper is primarily on accountability to risk-affected people, as this is the area that demands most progress. ‘Upward’ accountability to funders and governing bodies is routinely better incentivised,

integrated and delivered, so is only considered in this paper insofar as it enables improved ‘downward’ accountability.

To date there have been very few studies specifically dedicated to this subject, and they have tended to focus on specific instrument types (see Forest, 2018) or actors (see Vaughan and Hillier, 2019). This paper takes a purposefully wider sweep as it aims to convene learning from many different approaches. This diversity—from World Bank contingent loans, to local microinsurance—does present caveats around comparability, but it also presents the advantages of cross-fertilising learning and establishing a common reference point for this wide sector.

The paper is structured in three parts: the first presents a working definition of accountability; the second examines its DRF application to date; and the third draws lessons and questions for further discussion and action. Further information on specific accountability frameworks, and on accountability practice in specific instruments, is available in Annex 2—the additional detail may be valuable in underpinning future analysis and initiatives.

This review of instruments is deliberately illustrative, rather than evaluative—it is a preliminary mapping of the existence, rather than the effectiveness, of specific accountability provisions. As a working paper, it draws on a broad review of existing literature and information, as well as a limited number of interviews with practitioners and experts. It does however highlight, in Section 4, where future primary research could be fruitful.

2

● BEING CLEAR ABOUT WHAT ACCOUNTABILITY MEANS

2.1 What do we mean by it?

Accountability is a concept that is easy to agree with, but harder to meaningfully apply.² In part, this is because it is a notoriously slippery and contested term (see *inter alia*, Gaventa and Oswald, 2019, and Daoud, 2018). It is therefore essential to be clear what we mean when we are talking about accountability: defining it vaguely results in doing it vaguely.

There is no single definition of accountability—either generally or specifically relating to DRF. Although there are clear common threads, understandings of accountability vary widely between and within traditions, sectors, and even organisations, and they continue to evolve (McGee and Gaventa, 2010). Accountability is also culturally, politically, and linguistically defined, and it often does not translate well. Its scope and parameters are drawn in many different places—in particular, in terms of how it relates to participation and transparency.

This matters for DRF because it occupies several communities of practice, types of organisation, and disciplines. DRF stands at the intersection of humanitarian action, development cooperation, and disaster risk reduction (DRR), as well as of domestic, international, public, and private interventions. The hybrid nature of DRF could heighten the risk of confusion around accountability: that the same terms are used to mean different things. Yet the process of developing a common working definition also presents an opportunity to draw holistically from diverse approaches, rather than imposing an ill-fitting template from a single tradition.

The following section presents a working model that draws on a review of general definitions of accountability and its components and those specifically from:

- development cooperation, including concepts of social accountability and budget accountability
- humanitarian action, including definitions and goals set out in the Core Humanitarian Standard and the Grand Bargain
- DRR, including commitments in the Sendai Framework
- and emerging DRF-specific analysis, in particular from the Munich Climate Insurance Initiative (MCII) and the Start Network.

To aid mutual understanding and collaboration, further detail on how each of these communities of practice approaches accountability is provided in Annex 1.

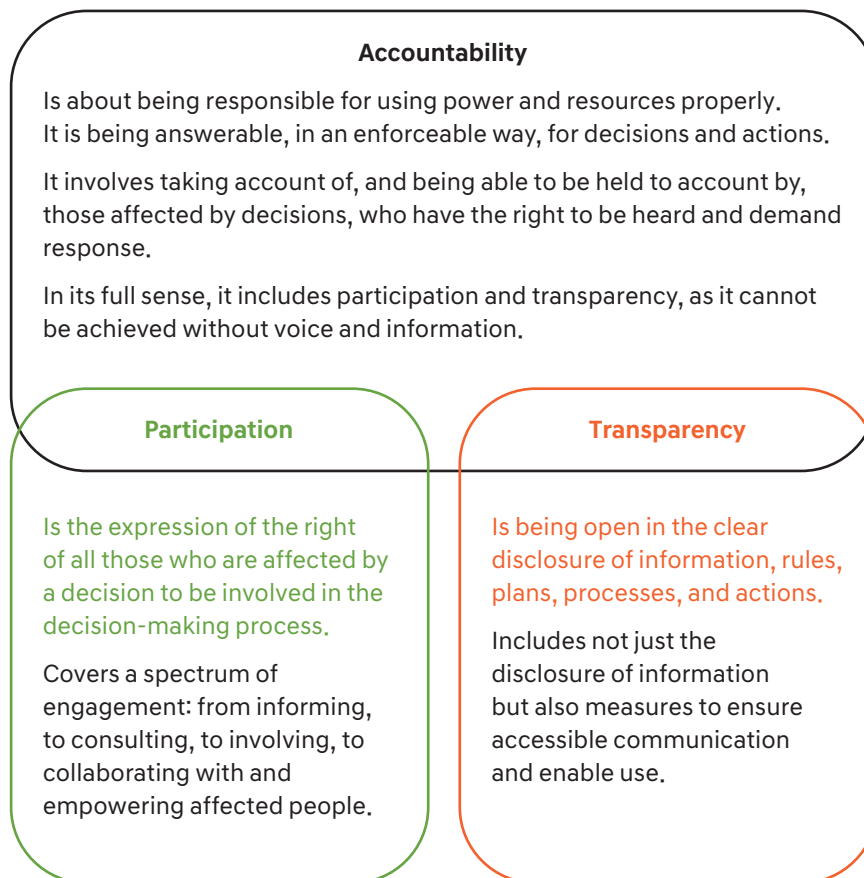
2.2 A working model: the what, when, and who of disaster risk financing accountability

2.2.1 The ‘what’

Accountability is closely related to participation and to transparency—and there are many different conceptions of that relationship (see Annex 1). Our working model of accountability proposes a comprehensive definition, one that encompasses participation and transparency as necessary elements of accountability, but also understands their wider and intrinsic value. In this, we build closely on the model proposed by MCII (Forest, 2018) (see Figure 1).

2 Sherry Arnstein famously summed this up in relation to participation: ‘The idea of citizen participation is a little like eating spinach: no one disagrees with it in principle’ (2019).

Figure 1. A synthesised definition



Cross-cutting principles: applying to all three elements of accountability

Equity: Addressing social inequalities and promoting equality, including gender equality. For example, actively recognising and addressing the power dynamics that deprive marginalised groups from realising their right to hold decision makers to account.

Inclusion: Ensuring that information and processes are accessible to, and inclusive of, all affected people, particularly the most vulnerable and those who may be socially marginalised or excluded due to gender, ethnicity, age, or disability.

Timeliness and predictability: Ensuring that processes are established and communicated early so that claims can be made and responses actioned in a timely fashion.

Note: The definitions used in this figure draw on a wide range of established definitions, which are detailed and referenced in Annex 1.

Source: Adapted from MCII (Forest, 2018)

2.2.2 The ‘when’

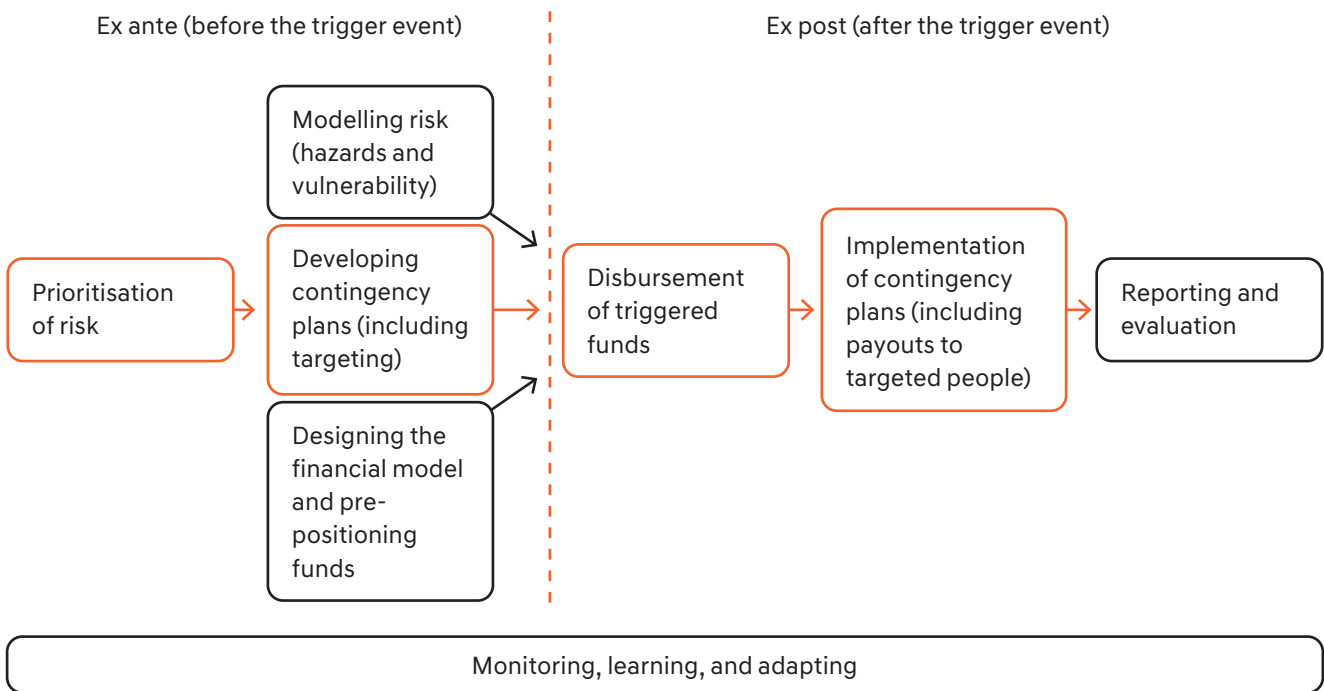
In order to put the ‘what’ of accountability into practice in DRF, we need to consider how it applies at every stage in the lifecycle of disaster risk financed interventions. The Start Network uses the helpful term ‘docking points’ to discuss where accountability might fit into decision-making in DRF design and delivery (Harris and Jaime, 2019b).

Figure 2 sets out the building blocks of the DRF model, each of which can be docking points of DRF. It is necessarily a simplified and generalised model, noting that the relationships between the stages are iterative and that their nature and order will vary between instrument types. It is also understood that this instrument cycle is nested in wider processes of disaster risk management, which come with other entry points for accountability. These can be broadly categorised into decision-making points around ‘money in’ and ‘money out’—a distinction

used by the Centre for Disaster Protection in its quality assurance model for DRF instruments. The ‘money in’ parts of the process are provisions relating to the supply of financing; ‘money out’ relates to the plans for using those funds to reduce the impact of disasters on people (Scott and Meenan, 2020).

Accountability applies both ex ante (in the prioritisation, modelling, planning, and design of the mechanism), and ex post (in the disbursement and actions after it has been triggered). Responsibilities run end to end in this timeline. For example, the core principles of the International Association of Insurance Supervisors (IAIS) are clear that insurers treat customers fairly before a contract has been entered into and until all obligations have been satisfied, and that they have a responsibility for both for good upfront communication and for fair outcomes (International Association of Insurance Supervisors (IAIS), 2019).

Figure 2: Accountability ‘docking points’ in the DRF model



2.2.3 The ‘who’

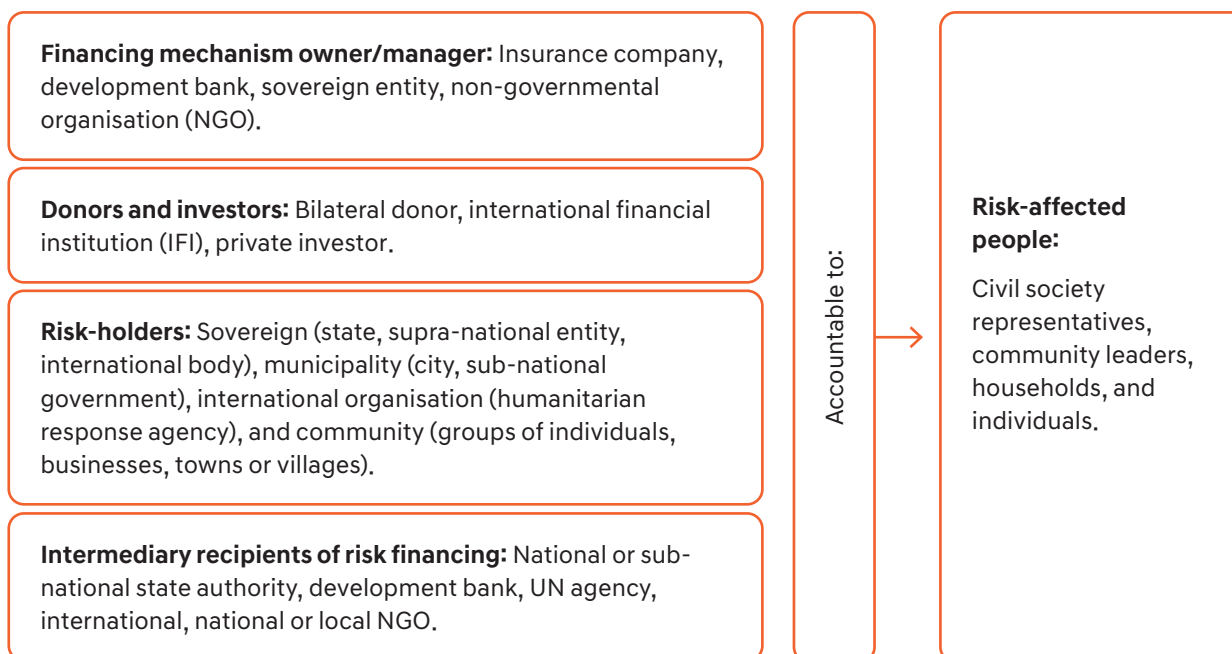
The third dimension of applying accountability is clarity around who is accountable, and to whom. It is important to factor in the relationship between risk-affected people and decision-making financing bodies, intermediaries, and implementing agencies. There is a wide range of DRF instruments, each involving different configurations of stakeholders and decision makers who will take on distinct or multiple roles depending on the mechanism. Drawing a clear chain of accountability for each instrument is essential for knowing who is answerable for what.

Accountability can be ‘upward’, to funders and governing bodies; ‘horizontal’, to peers and collaborating bodies; and ‘downwards’, to the at-risk people who should benefit or may be impacted. Ideally these will align but there may be tensions between them. As noted above, this paper places the focus on accountability to at-risk people (see also Figure 3) as it demands the most progress. The accountability chain will look different for each instrument, but some broad categories can be set by the identity and relationship between primary owners and payees. The ‘channel’ of primary payee—whether payment is made to a sovereign government, to an implementing agency, or direct to the risk-affected individual or

community—has very different implications for the length and complexity of the accountability chain, as well as the opportunities for direct participation and answerability and rights-based redress. For example, as we explore in Section 2.3.3, in a sovereign instrument such as a risk pool or contingency loan, DRF accountability is clearly bound up with wider state responsibilities and citizen rights around domestic budget accountability—decisions around signing-up to the instrument and spending its payouts are made by state authorities, so should be governed by the state-citizen contract. The risk pool or lender also has a role—including to ensure transparency, to be answerable for quality, and to require and support state accountability—and this needs to be clearly defined in each case.

The ‘sector’ in which the instrument originates may also be a factor: humanitarian DRF models delivered by agencies that align to humanitarian life-saving imperatives, and that do not channel funds through the state, may have a smaller scope for transformative work on the enabling environment for accountability—such as supporting policy and legislative developments, or citizen-centred governance mechanisms—compared to those delivered by development agencies and institutions.³

Figure 3: Accountable parties



³ This is of course by no means clear-cut, and there is long-standing debate around the widening parameters of ‘new humanitarianism’ to encompass more politicised action to improve the welfare of populations and the capacity of institutions (see *inter alia* van den Homberg, Geveart, and Georgiadou, 2020).

2.3 What are the characteristics of DRF to consider?

Accountability is a set of common principles and obligations that apply whatever the intervention and context. DRF is no different in this regard: accountability is equally imperative in DRF as in any other form of public finance.

However, DRF has several important features that demand particular attention in how these accountability principles apply. Three key features emerge from a review of DRF models:

- science-based modelling
- ex-ante agreement
- new configurations of stakeholders.

These are not unique to DRF but they are salient—and each presents both challenges and opportunities as entry points for accountability.

2.3.1 Modelling: DRF involves science-based modelling

Science-based modelling of risk is a defining pillar of DRF. The ability to gather and analyse complex data, and then to build predictive models, underpins the ability to pre-arrange financing and action. This detailed, specialised work is essential to quantifying the risks to be financed, to calculating the triggers for payouts, and to identifying where, and to whom, they should go.

This defining pillar has been seen as being inherently ill-suited to accountability. Like the nilometers of Ancient Egypt's priesthood, there has been a common conception that the scientific models behind DRF are necessarily too technically difficult to accommodate participation and scrutiny by the non-specialist public.⁴ Science-based triggers have the potential to increase transparency and accountability around declaring an emergency and releasing funds—but at the same time technicalities and complexities can render their processes opaque and inaccessible.

There is however a growing recognition that this conception should and can be challenged, particularly because the imperfections of data and predictive models exacerbate basis risk—the risk of a gap between the payout and the actual losses. As Section 3.2.1 explores, it is possible that a model that involves inputs from at-risk communities will have lower basis risk—arising from

shortcomings in both data and communication (Harris and Cardenes, 2020).

The use of machine learning and artificial intelligence to generate models and to trigger payments also raises important questions of 'algorithmic accountability'. How can affected people be enabled to understand and influence these, and hold organisations to account for biases, exclusions, and errors? Such questions are closely linked to the wider set of questions of ethics and accountability that are emerging around data responsibility (van den Homberg, Geveart, and Georgiadou, 2020), but in many ways they are also an extension of existing asymmetries of access to information and redress.

2.3.2 Timing: DRF is arranged ex ante

DRF is, by definition, arranged ahead of time. In theory, ex-ante agreement means more time for deeper accountability (Harris and Cardenes, 2020; Vaughan and Hillier, 2019). Fixing pre-agreed financing to pre-agreed contingency plans can also promote public accountability by binding politicians to advance commitments: 'a useful tool against leakage and undue political influence' (Lung, 2020).

Yet there is little evidence that this potential has been realised. Indeed, for all the promise of long timeframes, in reality, many DRF models face accountability-limiting time constraints. These manifest in four ways.

- Firstly, innovation brings time pressures: imperatives to roll out pilots and scale up quickly to prove concept and demonstrate value leave little time to invest in building in accountability.
- Secondly, while the ex-ante planning period might be longer, the post-payout implementation window can be very short—in some rapid-onset disasters, a matter of days. This leaves little opportunity to respond to feedback or to offer redress to complaints apart from the most egregious. Timing is an important variable: rapid-onset disasters such as floods may require different measures to solicit and respond to feedback, compared to slow-onset disasters such as droughts, where a six-month implementation lead time is considered reasonable (World Food Programme (WFP), 2019). Similarly, a long return period presents different opportunities and challenges for sustained engagement.
- Thirdly, tying payouts to pre-agreed action can promote

⁴ In his 2014 book, *How to Speak Money*, John Lanchester recounts the story of how the complex rituals of the Egyptian priesthood to divine the annual flooding of the Nile plain worked to shroud their predictive tool, the nilometer, in mystery. He notes: 'It had to be kept secret by the ruling class and institutions because it was a central component of their authority' (Lanchester, 2014).

public accountability, but it can also limit scope to react to unforeseen disaster impacts, and to emerging feedback (Lung, 2020).

- Finally, there is the broader challenge that ex-ante engagement poses: ensuring meaningful participation in uncertain future scenarios can be difficult—it is arguably easier, and a more pressing use of people’s scarce time, to engage with what is certain in the present.

These issues beset uptake of, for example, household disaster insurance: it is hard for people to engage with distant or low-probability events. Disaster insurance is a ‘credence good’ where the distance of potential hazards makes it hard to understand the quality of the instrument upfront, and there is limited space to compare expectations with reality after the event (Clarke and Wren-Lewis, cited in Johnson, 2020).

2.3.3 Stakeholders: DRF involves particular configurations of investors and risk-holders

DRF brings together diverse stakeholders, collaborating in new ways, to design and deliver instruments and interventions. This brings a wealth of experience in terms of accountability models, but also the associated risk of confusion. It also creates specific challenges around ownership and responsibility for accountability.

Firstly, the involvement of private sector risk calculation agents and insurance companies can provide important expertise and impartiality, but it can also limit transparency and create blockages in accountability chains. Analysis of sovereign risk pools has shown that some cite ‘client confidentiality’ as the reason for non-disclosure of risk models, premium calculations, or investment and disbursement details. They argue that, in the absence of a government waiver, information should be accessed via national budgets, although this is often inaccessible in many client countries (Forest, 2018).

Upfront agreement of public goods in the negotiation and contracting of DRF instruments is therefore important.

With multiple stakeholders come multiple and often competing expectations of what an instrument can deliver. The involvement of the market can privilege upward accountability to donors and investors—in innovative finance, creating a product that clients are willing to pay for and that promises returns can be a far greater priority than being answerable to affected people. A study of the ‘cycle of hope and disappointment’ of index-based livelihood insurance in Kenya showed that the unrealistically high expectations of farmers grew from the misunderstandings that took root in the gaps between stakeholders, ultimately undermining the legitimacy and trust in the instrument (Johnson *et al.*, 2019).

This second, linked, challenge is the risk that with the involvement of multiple stakeholders, accountability can fall through the gaps between them. It is a risk in all intermediated public finance, and particularly public-private partnerships (see *inter alia* Fabregas, Roza, and Garza, 2017; Forrer *et al.*, 2010), and one that is heightened in the complex structures of some DRF mechanisms, including sovereign risk pools and World Bank instruments including the Pandemic Emergency Financing Facility (PEF). As we have seen, the citizen-state contract should be primary when it comes to sovereign instruments—but the accountability of other parties also needs to be defined and developed, especially in fragile contexts. For example, providers of insurance-based DRF still have a clear responsibility for providing products that have clear and suitable terms, and that deliver fair outcomes, even if the choices to sign up and to spend payouts rest with the ‘client’ state.⁵ Overcoming the risk of accountability falling through the gaps requires a clear, user-centred and context-specific articulation as to what each entity is answerable for, and how.

5 The International Core Principles of the IAIS set out clear standards, including that those who provide insurance should be responsible for ensuring that ex-post outcomes are fair, even if it is the client who chooses the product (IAIS, 2019).

3

● REVIEWING ACCOUNTABILITY IN DISASTER RISK FINANCING INSTRUMENTS

3.1 Scope of the review

Underpinning this study is a review of existing and emerging approaches to integrating accountability in operational DRF instruments. Given that transparency is so central to public accountability, the review primarily considered publicly available information, supplemented with a small number of interviews.

The existing literature on accountability in DRF is scant and focused on specific instrument types or institutions. This review took a deliberately wider sweep in order to obtain an overview of practice and lessons from across the DRF sector. The paper intends to provide initial mapping of available information in order to identify a range of practice, and draw emerging themes. The analysis was neither intended to be comprehensive nor evaluative. The following section provides a synthesised summary of findings. Further details can be found in Annex 2.

Instruments are often grouped by the function they serve in a layered financing strategy: that is, to retain risk or to transfer risk (Meenan, Ward, and Muir-Wood, 2019). This grouping can be helpful as, for example, insurance-based risk transfer instruments share common features, such as calculation of premiums, which has implications for accountability.

However, categorising by primary ‘channel’ is also helpful as this has direct bearing on the chain of accountability—the direct or indirect relationship between the risk-affected person and those who are answerable to them. As already noted (Section 2.2.3 and 2.3.3), accountability looks different in a sovereign fund than in instruments that are implemented by international agencies, or in community-managed funds. Similarly, accountability may be easier in micro-level instruments, which *de facto* involve people and communities and deliver direct benefits to them, compared to sovereign-level instruments, which are at a greater remove and, in some cases, may deliver public goods rather than private benefits.

Table 1: Instruments reviewed for this paper

	Risk retention	Risk transfer
Sovereign (state-managed funds)	Ethiopia’s Productive Safety Net Programme (PSNP) reserve fund	African Risk Capacity (ARC)
	Catastrophe Deferred Draw Down Option (Cat DDO)	Pandemic Emergency Financing Facility (PEF)
Institutional (non-state organisation managed funds)	International Federation of Red Cross and Red Crescent Societies (IFRC) Forecast-based Action Fund (FbAF)	Start Network ARC Replica
	UN Central Emergency Response Fund (CERF) anticipatory action	
Micro (community-managed funds)	Food and Agriculture Organization (FAO) community contingency funds (CCFs)	R4 Rural Resilience Initiative (WFP/Oxfam America) Centre for Agriculture and Rural Development Mutual Benefit Association (CARD MBA) mutual microinsurance

The review quickly revealed that documented accountability practice is currently much too patchy and partial for a systematic application of our working accountability framework to be fruitful for each instrument—the mapping has far more gaps than data. The following sections therefore summarise the salient areas of existing or emerging practice, and the major gaps.

3.2 Existing and emerging practice

3.2.1 Generating indicators and modelling risk

Science-based modelling of risk, involving gathering and analysing data on hazards and vulnerability, is central to the ex-ante DRF approach. Much of this process can be technically opaque and remote from affected people. However, experience in several instruments shows that introducing participation and transparency into data-gathering and modelling is both possible and effective—and this can move beyond the nominal participation of data extraction. Work on farmer insurance has demonstrated how at-risk communities can be educated in insurance models and be a source of expertise in understanding the risks, needs and financing products best suited to their context (see *inter alia* Vargas Hill and Robles, 2011; Hernandez-Aguilera *et al.*, 2020).

Recent initiatives by the International Federation of Red Cross and Red Crescent Societies (IFRC), Start Network, WFP, and the Next Generation Drought Index consortium (NGDI) show how co-generated and consultative data-gathering can create more accurate DRF models that more accurately represent the risks that people face (NGDI,

2020; Harris and Swift 2019; Harris and Jaime, 2019a). In Ethiopia, initiatives are underway as part of the R4 programme to systematically engage farmers in the design and gathering of data for the insurance component. In Bangladesh, the models used by IFRC’s Forecast-based Action Fund (FbAF) and by the UN Central Emergency Response Fund (CERF) were based on scientific modelling led by a national expert combined with surveys of risk-affected people to understand exposure and impact.

Participatory methods of linking top-down weather and climate data with bottom-up hazard data do not guarantee accountability—it is possible to gather information from people without enabling their meaningful input. However, they can open the door to greater transparency, participation, and answerability. Engaging with communities to gather and test vulnerability data has potential—as yet unrealised in the instruments reviewed—to open wider channels of accountability throughout the DRF cycle. Engaging community stakeholders could enable ‘a constant feedback loop’ (Enenkel *et al.*, 2020), an ongoing exchange of actionable information about risks, vulnerabilities, and decision-making.

Box 1: Participation in the Next Generation Drought Index

The NGDI project is an international research consortium, led by Columbia University's International Research Institute for Climate and Society (IRI), involving the European Space Agency, AIR Worldwide, and the International Water Management Institute, commissioned by the World Bank's Crisis and Disaster Risk Finance team. It aims to develop a conceptual framework for developing more accurate indices and indicators to trigger DRF for droughts, which are much more complex to predict than floods. Collaboration and iteration are central to its process for generating accurate indicators. It also prizes transparency, aiming to deliver drought indices that local decision makers can understand, unpack, and tailor to their specific contexts.

The approach starts from the understanding that, in order to minimise basis risk and more closely match the real losses that people face, models need to combine data from several sources. Importantly this must take people's experiences into account, including by crowdsourcing information from communities about their exposure and vulnerability through surveys and participatory processes, such as interactive games as developed in WFP's R4 project (see Annex 2). Initial diagnostic tests of this crowdsourced information have shown its added value and reliability, but also highlighted the need for investment in time, resourcing, and technology if these participatory processes are to be scaled up (NGDI, 2020).

3.2.2 Designing the financial instrument

Accountability in the ex-ante design phase involves openness and answerability around the decisions of how the instrument will operate. It involves the technical 'money in' aspects of how and when the instrument will pay out, and to who, and it also links closely to the 'money out' aspects of contingency planning (see following section). It includes open decision-making and communication about what levels of risks the instrument should cover, the appropriate cost of this cover, and who should benefit when thresholds are met.

The spectrum of accountability here extends from risk-affected people having their views taken into account in the design, and being able to hold decision makers to account for poor design, to being able to take a full and equal role in co-design.

Examples of full co-design appear to be extremely rare in aid financing, but it is something that devolved and micro-level financing instruments go the furthest towards achieving. Mutual microinsurance schemes, such as the Philippines' Centre for Agriculture and Rural Development Mutual Benefit Association (CARD MBA) scheme, are premised on co-ownership and management and so have in-built opportunities for feeding into design. Similarly, the Food and Agriculture Organization (FAO)-led CCFs and caisses de résilience (CdRs) are member-owned, so members are expected to actively participate in the design and governance, and community facilitators are trained in management of community savings and loans systems (Food and Agriculture Organization (FAO), 2016a).

3.2.3 Contingency planning

Ex-ante planning processes should provide an opportunity for deeper participation and transparency. They should generate clear plans for what will happen and who will benefit so that people can hold DRF actors to account when the plans are triggered. In many instruments, however, this opportunity does not appear to have been fully seized: reference tends to be made to consultation rather than to co-design, but there is often very little information about the extent and quality of consultation, nor how the views of those consulted ultimately influence decisions and design. The World Bank's Cat DDOs are a case in point: although there are some (albeit limited) entry points for consultation, a review of publicly available documentation found references to consultation to be minimal, and largely nominal.⁶

Contingency planning involves decisions about who should benefit (targeting) as well as what actions need to be taken and by who. Targeting involves analysis of who will face the greatest levels of need in the event of a disaster, as well as decisions about who should be prioritised to receive finite funds. Consultation is by necessity a feature of this, surveying or assessing the vulnerability, exposure, and economic means available to individuals, households, or communities. But this consultation is not necessarily meaningfully participatory, tending more towards information extraction than deeper inputs to decision-making.⁷ Nor are the targeting decisions necessarily transparently communicated back to those who will potentially benefit, or be excluded from payouts. In sovereign systems related to safety nets, there

⁶ These include the development of the development policy loan (DPL) agreements and of 'prior actions'. See Annex 2 for further detail and explanation of these terms.

⁷ According to the spectrum of participation set out in Figure A.1, Annex 1, participation involves degrees of public influence on the decisions that affect them.

is the possibility of linking to clear eligibility criteria that drive targeting at the community level. The shock-responsive component of Ethiopia's Ethiopia's Productive Safety Net Programme (PSNP) builds on a process that

starts at the community level, where community food security task forces have responsibility for assessing need and agreeing targeting.

Box 2: Consultation in IFRC's Forecast-based Financing Early Action Protocols

To be eligible to access IFRC's FbAF, national societies must go through a national-level forecast-based financing (FbF) process, which includes the creation of a technical working group, including with partners from government agencies, meteorological agencies, and academic institutions. This process begins with a study to assess the feasibility of FbF in the country. If deemed feasible, the process results in a pre-agreed action plan known as an Early Action Protocol (EAP). IFRC's guidance for national societies makes it clear that both the feasibility studies and the design of EAPs should be

consultative. At the feasibility study phase, design options should be explored through wide multi-stakeholder consultation including disaster-exposed communities. EAP design should also be consultative, securing the inputs and buy-in of authorities and communities, including through extensive focus group discussions. In Mongolia for example, government *Dzud* forecasting models were the basis for consultation with communities on optimal timing and substance of early actions (based on IFRC (n.d.) and interviews with IFRC staff).

3.2.4 Implementation

At a minimum, risk-affected people should be able to complain about the quality, quantity, and targeting of DRF payouts, or the delivery of DRF-funded activities. And of course, institutions must be answerable to these complaints. In an end-to-end accountable process, people would be deeply involved in the planning stage to identify what the action plan is and who should benefit. And at the implementation stage, they should be able to hold implementers to account if delivery falls short of agreed expectations.

Grievance and complaints mechanisms appear to be the most common accountability feature of DRF instruments, but it is unclear what degree of access or effective redress they offer or what the uptake has been. All Catastrophe Deferred Draw Down Option (Cat DDO) agreements include a standard clause detailing the DPL grievance mechanism but it there is no information about how accessible this is, the extent of uptake, or the quality of

redress. The African Risk Capacity (ARC) risk pool has a hotline for officials to whistleblow, but at the country level, complaints should be channelled to state authorities. In Kenya, for example, when it was part of the ARC risk pool, a portion of ARC payouts were linked to the national Hunger Safety Net Programme (HSNP) social protection scheme, which has its own grievance and complaints processes linked to water resource user associations (National Drought Management Authority (NDMA), 2017, p. 50, cited in Kunzel and Nkiozi, 2020).

For IFRC, accountability is a central strategic priority. As part of implementing this there has been significant investment in rolling out and refining feedback and complaints mechanisms. In principle, these mechanisms apply in the same way to FbA-funded actions as to any other. However, in practice, they can be limited by time constraints. As highlighted in Section 2.3.2, the extremely short implementation windows of rapid-onset emergencies can severely limit opportunities for corrective actions.

Box 3: Complaints mechanisms in CARD MBA mutual microinsurance in the Philippines

CARD MBA is one of the largest providers of mutual microinsurance in the Philippines. Insurance is tied to a microfinance scheme and CARD MBA members are organised in community centres of up to 30 policyholders, each overseen by an account officer. Members own the insurance pool. Community centres are usually in the house of a member, are easy to get to for weekly transactions, and create close ties of support.

CARD has a chat tool that responds to complaints channelled through social media accounts and has also set up a customer relations call centre that deals with complaints. However, an independent survey found that most CARD MBA members prefer to take their complaints directly to account officer during the weekly meetings (University of Cambridge Institute for Sustainability Leadership (CISL), 2019).

3.2.5 Monitoring, evaluation, and learning

Monitoring and evaluation should be the foundation of accountability, generating a public account of the use of DRF, routine informal and formal opportunities for affected people to have their views heard, and ultimately answerability, by integrating and feeding back what has been learned. However, recent guidance from the Centre for Disaster Protection has highlighted that DRF impact evaluations remain very rare, and there is no commitment to sharing them publicly (Scott, 2020).

The sector currently lacks both the shared tools for monitoring its performance and the shared accountability for implementing any learning or recommendations, or for closing the feedback loop to affected people (see Start Network and Red Cross Red Crescent Climate Centre, 2020).⁸ As we have seen, this is the result of many factors: the imperatives to roll out pilots quickly; the lack of adaptive latitude that can come with pre-fixed plans; and

the accountability culture of some stakeholders. It is also far from unique to DRF.

There are examples of instruments that build learning into their cycles. After each activation of IFRC's FbA, national societies have to provide financial and narrative reporting and, later, impact assessments. And in order to requalify for future funds, EAPs must be updated and revalidated, integrating learning from the prior payout.

Cross-sector efforts to tackle the learning deficit are emerging. The InsuResilience Programme Alliance has convened a group of specialists to work on potential shared indicators, and the Start Network and Red Cross Red Crescent Climate Centre are leading a practitioner group on monitoring and evaluation of FbA, which is sharing know-how and knowledge to build and use the evidence base. With sufficient prioritisation, these could become a source not only of technical guidance but also of collective commitments to enhancing accountability.

Box 4: Monitoring, evaluation, and learning in forecast-based action

The Start Network and the Climate Centre convene a working group of monitoring, evaluation, accountability, and learning (MEAL) practitioners active in forecast-based action, including IFRC, FAO, United Nations Office for the Coordination of Humanitarian Affairs (UNOCHA), WFP, and several international NGOs. As part of its work to share knowledge and improve practice, it conducted a comparative review of current approaches to impact assessment of FbA from a wide range of agencies. Among the specific challenges identified is that of counterfactuals—or 'measuring

things that did not happen'. As FbA is designed to act early and minimise the impact of a pending hazard, impact studies need to be able to capture the absence of negative impacts and the avoided losses and costs.

Agencies are developing and testing a variety of approaches to these questions, using scenarios or control groups. Research questions to understand the avoided losses and compare to scenarios of inaction or later action are included in guidance toolkits for the Start Network ARC replica, FAO's Early Warning Early Action, and the Climate Centre's FbF.

⁸ The Start Network and Climate Centre review of agencies' guidelines relating to monitoring evaluation and learning for FbA found gaps in both engaging communities in design of monitoring and evaluation, and in communicating findings back to them.

3.3 Major gaps

3.3.1 Information disclosure and communication

As we have seen, there are significant gaps in all aspects of accountability— it is arguably more notable by its absence than its presence in DRF. However, the research process for this review highlighted a basic deficit—namely how difficult it is to source information about the workings of many DRF mechanisms, including basic financial data and up-to-date project implementation documentation.

Information should be the fuel and the foundation for accountability. But open, up-to-date information about even the most basic financial and operational aspects of many DRF instruments remains very difficult to access, compare, and interrogate. This is the case in English, let alone in the languages of recipient countries and communities. The fact that the process of gathering the information presented in Annex 2 was time-intensive yet still incomplete is indicative of the state of accountability in the sector. Finding the financial details is an instrument-by-instrument investigative process, sometimes yielding unclear results: for example, there is no accessible dashboard for the World Bank's PEF. A World Bank press release in July 2020 noted that just under US\$196 million had been transferred to support covid responses in 64 countries (World Bank, 2020a), but it took a country-by-country deep-dive to ascertain what the countries were, and the status of payouts to each remains unclear.

The availability and communication of key information does of course vary between instruments and organisations—some proved easier to investigate than others. In some cases, there were improvements in the provision of publicly accessible information. For example, ARC does appear to be responding to calls to implement its own transparency policy 'to disseminate information to the public'. Whereas a 2018 study only found one final implementation plan for payout online (Forest, 2018), by 2020 all had been published. This is the case for specific instruments, and also for DRF sector-wide information.

3.3.2 Strategic approaches

While this research was able to find specific examples of aspects of accountability, it did not find strategic approaches. As Section 3.2 showed, these examples tend to cluster around 'ground-truthing' modelling data at one end, and having complaints mechanisms at the other. They did not form part of a holistic logic of 'end-to-end' accountability—one that creates what the Start Network has called a 'clear line of sight' between the risk and vulnerability that is modelled and the response that is funded and delivered (Harris and Jaime, 2019a; Harris and Swift, 2019).

Creating an explicit and granular accountability strategy, rather than piecemeal provisions at specific entry points, would allow for a clear articulation of who is ultimately answerable for what, how, and to whom. Many organisations involved in DRF—such as IFRC, WFP and the Start Network—do have high-level commitments and frameworks for accountability, and these could inform the prioritisation of an explicit, granular, and connected plan for implementing this in their DRF instruments. Organisations that do not have these pre-existing commitments can still formulate clear, practicable, and integrated DRF accountability strategies: the recent prioritisation of a gender strategy by ARC can be seen as an indication of what might be possible.

Of course, DRF instruments do not stand alone. They should be part of an integrated risk financing plan within a comprehensive disaster risk management strategy. As such, DRF instruments need to be answerable not just for how they deliver against their own objectives, but also how they contribute to the wider systemic whole. Without this, it is possible to have open, well functioning instruments that, to borrow a phrase from systems thinking, 'do the wrong thing right' (Ackoff cited in Ramalingham, 2013). Accountable DRF instruments need to be considered within, and can be a catalyst for, accountable DRF strategies.

4

● IMPROVING ACCOUNTABILITY: LESSONS AND QUESTIONS

4.1 Conclusions

This working paper deliberately took a wide scope for review, covering all aspects of accountability, including transparency and participation, across all stages of the DRF cycle. This was based on the understanding that a selective focus on specific aspects of accountability would miss gaps elsewhere, both in discrete aspects and the overarching ‘end-to-end’ whole. It also covered a wide range of instruments and actors, based on the understanding that they share distinctive features, can learn lessons from each other, and could benefit from a sector-wide discussion on accountability.

As we have seen, the distinctive features of DRF—namely science-based modelling, timing, and stakeholder configurations—do not present insurmountable challenges to accountability, but they do require attention. Indeed, experience shows that they can defy assumptions about accountability: modelling is not inherently antithetical to openness and can instead offer important opportunities for engagement; and the assumed ex-ante potential for co-design and consultation is far from automatic. Designing-in meaningful accountability to affected populations could be central in shifting the new ‘technologies’ of DRF, from being ‘technologies of hubris’ to ‘technologies of humility’ (Jasanoff, 2003) that deal maturely with uncertainty and elevate trust in communities to the same level as trust in scientific models (Johnson, 2020).

This review of concepts and applications of accountability across sectors, instruments, and DRF cycles highlighted three main conclusions.

The building blocks of a common starting point do exist

Despite consensus that accountability is important, there is little clarity about what it should look like, either in theory or in practice. This is symptomatic of the fact that DRF occupies a hybrid space between aid sectors and institutions, and also the wider fact that accountability remains contested and confused even within each of these. However, there are clear building blocks for a ‘good enough’ foundational definition as the base for further dialogue, design, and action. This understands accountability to be the capacity to be held responsible, and to be enforceably answerable, for using power and resources properly. Participation (meaningful involvement of affected people) and transparency (clear disclosure of information) are essential aspects of this. It also understands that, in order to put this into practice, it must also factor in the ‘when’ of the DRF cycle and the ‘who’ of the chain of accountability.

There is a selective approach to implementation

Accountability should apply across the DRF cycle, but the instruments reviewed appeared to lack this breadth, tending to focus on one or two aspects. Most tended to have some sort of complaints mechanism at the implementation stage, and several included some degree of consultation at the data-gathering stage, but there was no evidence of a comprehensive or strategic approach to accountability throughout the cycle. Similarly, the depth of accountability was unclear: many references to consultation appeared nominal, participation sometimes appeared to veer towards the extractive, and transparency was usually limited.

There is an emerging appetite to do better

Accountability is gaining attention as DRF instruments evolve. In some cases, this is a result of specific critiques in evaluations that drew attention to aspects of the accountability deficit. In others it is a more in-built progression as agencies emerge from fast-paced operational imperatives of pilot implementation stages to take stock of performance against their wider commitments to accountability standards. And, in the case of data gathering and modelling, it is linked to the need to improve accuracy and efficacy. Together, these inter- and intra-agency initiatives are beginning to generate some initial thinking that could generate wider momentum.

This working paper is intended as a starting point for building evidence, analysis and ultimately action on accountability in DRF, both sector-wide and instrument-specific. To further this end, it proposes the three following sets of questions, which emerge from the research.

4.2 Evidence questions: what more do we need to know?

The initial findings in this paper could be further developed by building the evidence base on the following.

Existing applications

The research was an initial illustrative overview of accountability in selected instruments, primarily derived from publicly available information. There is clearly scope for more substantial mapping, to include more sources and instruments, in order to build a more comprehensive picture.

As an illustrative (rather than evaluative) overview, this paper describes the existence, rather than the effectiveness, of specific accountability provisions. For example, whether complaints mechanisms led to redress, or consultation to meaningful input into decision-making. While there is some wider literature on the quality and outcomes of accountability measures in the humanitarian and development sectors, there is none specifically relating to DRF. Drawing lessons from elsewhere about what works in accountability, and why, would yield pertinent lessons for DRF, alongside investigating the effectiveness of instrument-specific provisions.

The recipient perspective

Linked to the question of what works is the need for the perspective of risk-affected people. Ultimately, they are the best judges of whether accountability mechanisms are accessible, whether they offer meaningful opportunities for input, influence and redress, and whether they clearly close the feedback loop. Soliciting their views would be an important component of developing the evidence base.

4.3 Analysis questions: what more do we need to understand?

DRF instruments are clearly not homogenous, and a synthesis of the experiences from diverse sovereign and institutional and micro mechanisms is bound to be reductive. However, there is value in cross-learning between these diverse instruments to develop a healthy DRF accountability ecosystem, particularly to understand the following: What can sovereign, institutional and micro learn from each other, or how might they complement each other?

Each of these involves very different chains of accountability, sets of social rights and contracts, and modes of operation, but there may be lessons that can be drawn across all of them. In particular: how can the deep trust and ownership inherent in mutual micro initiatives be translated to sovereign and institutional ones, for example, through devolved decision-making on financing? And how can diverse instruments complement each other as part of a strategic and comprehensive approach to accountable DRF in high-risk countries?

How can 'humanitarian DRF' and 'development DRF' learn from each other?

The humanitarian sector has standards and commitments on accountability—notably in the Core Humanitarian Standard. How might these usefully translate to DRF led by development institutions? Development institutions have a relationship with the state that could support an enabling environment for accountability. How then can development engagement in DRF support the transformative approaches to accountability, centring on the citizen-state relationship, which are beyond the scope of principled humanitarian action?⁹ And what can development and humanitarian actors learn from each other about enabling accountability in places where the social contract between state and citizen (including marginalised groups and non-citizen residents) is fragile or fractured?

9 These might include, for example, actions to advance social inclusion, to support devolved decision-making structures, and to support civil society to promote enabling public interest legislation and participatory governance systems such as civil society-led social audit or budget tracking (Amaratunga, Haigh, and Hettige, 2019).

What can DRF learn from other related sectors?

There is much that DRF can learn from approaches outside the aid sector. There are many models of innovative and effective participatory democracy and citizen accountability initiatives in both public finance accountability and disaster and climate change action (Swithern, 2020). What and how can DRF actors gain from engaging with practitioners in these fields? Similarly, what can be learned from wider risk finance regulation and best practice, particularly in the insurance sector?

What does it take for accountability to be meaningfully prioritised?

Accountability is starting to rise up the DRF agenda. As seen in Section 4.1, this is sometimes the result of ‘upward accountability’ imperatives—in other words, responding to donor demands for better transparency or governance. Elsewhere it is the extension of existing institutional commitments and peer obligations on accountability. What stimuli are necessary to prioritise accountability within other institutions, particularly multilateral development banks, which lack either these donor or peer incentives? And where it is becoming a stated priority, what does it take to build momentum and move it from statement to practical application?

How can meaningful accountability be brought to scale?

Initiatives to crowdsource information and engage communities in co-design are highly promising, but acknowledged to demand investments of time and resources. What then is required from donors, designers, implementers, to scale this up efficiently and effectively? Are there real-world limits on this? And should these then influence the real-world limits on the rollout of risk transfer instruments?

4.4 Action questions: what needs to happen now?

Accountability is a high standard and a tall order—and so it should be. Few public finance instruments, even domestic ones in countries that rank highly on budget transparency, can be said to be fully accountable. Accountability is easier prescribed than delivered: the many (very real) barriers to realising accountability, particularly in high-risk, low-income settings, are well documented. It is known to be a weak spot even, in sectors that have invested in sophisticated frameworks for promoting it.

But the scale of the task should be seen as a prompt for action rather than inaction. In addition to taking measures to improve accountability within instruments, there are three potential starting points to build on this working paper and to begin to support better accountability in the sector.

Consulting widely

The International Association on Public Participation (IAP2) sets out seven core values—one of which is the involvement of participants in designing how they participate. This is also critical in the development of accountability in DRF. A closed top-down approach to designing accountability standards and measures is not only paradoxical, but also likely to miss the mark. Identifying and involving civil society groups in DRF-operating countries and soliciting the views of at-risk populations on what meaningful accountability would look like for them would be first steps towards a more genuinely collaborative process of evolving accountability measures, and by extension, DRF instruments that work.

Convening accountability learning

There is a need to facilitate cross-organisational learning. This could build on existing multiagency fora and platforms on DRF and anticipatory action such as the Start Network and Crescent Climate Centre practitioner group on monitoring and evaluation of FbA. It will be important that this includes a wide group of stakeholders—both geographically (to include experts leading sovereign and micro instruments in the global south), and institutionally (in particular to ensure IFIs, such as the World Bank, are actively engaged).

Developing tools

There are enough frameworks and guidelines in the humanitarian and development sectors to prove that these are not a panacea for inaction—and indeed the ‘dusty stack’ of guidelines (Campbell, 2018) can be part of the problem. Similarly, a one-size-fits all for such diverse instruments risks being unhelpfully reductive. However, there is value in defining a light but common reference point for expectations around accountability, such as this paper begins to do, which agencies can then tailor. By using this to chart and share initiatives, organisations can see what others are doing, and can improve accountability even as the sector evolves.

● ACCOUNTABILITY DEFINITIONS AND APPROACHES

Development approaches to accountability

Definitions and commitments

Accountability is understood to be a key component of good governance, but there are no sector-wide commitments to accountability in development.

The Action for Empowerment and Accountability research programme (A4EA) draws on development literature to define accountability as: ‘the process of holding actors responsible for their actions’ (Schedler, 1999; Fox, 2007a; Joshi, 2008). This involves ‘answerability’—usually formal processes where actions are held up to specific standards of behaviour or performance. ‘Hard’ (as opposed to ‘soft’) forms of accountability involve sanctions and/or remedies for transgressions. (Fox, 2007b).

Applications

Unlike the humanitarian sector (see following section), there is no standard-based stocktake on accountability across the wide international development arena.

Two approaches to accountability are, however, particularly relevant to disaster risk financing (DRF):

- the World Bank’s approaches to social engagement and accountability
- budget accountability approaches.

Social accountability

Social accountability is about ‘how citizens demand and enforce accountability from those in power’ (Claasen and Alpín-Lardiés, 2010). The World Bank defines it as a cornerstone of good governance and ‘an approach that

relies on citizens directly or indirectly participating in demanding accountability from service providers and public officials’ (World Bank, 2014a). In practice, this means supporting the conditions and the practical mechanisms for people to access information, have their voices heard, and negotiate change.

Citizen engagement

Citizen engagement, as defined by the World Bank, relates to the accountability of interventions to citizens in ‘a two-way relationship that implies the existence of a tangible response to citizens’ feedback [...] the objective of mainstreaming citizen engagement in operations is to give citizens a stake in decision-making to improve development outcomes’ (Independent Evaluation Group (IEG) and World Bank, 2018). This has evolved from reputational risk management to a more holistic and proactive approach, but it is far from commonplace or systematically applied (IEG and World Bank, 2018).

Budget accountability

Budget accountability involves civic engagement in budget processes and monitoring, including budget literacy campaigns, public expenditure tracking, independent budget analysis, and participatory budgeting approaches (World Bank, 2014b). The International Budget Partnership’s Open Budget Survey rates countries against three key pillars (IBP, 2019):

- transparency – comprehensive and timely budget information
- participation – meaningful opportunities to engage in the national budget process
- oversight – functioning legal and institutional oversight institutions.

Humanitarian approaches to accountability

Definitions and commitments

The Core Humanitarian Standard on Quality and Accountability defines accountability as ‘the process of using power responsibly, taking account of and being held accountable by, different stakeholders, and primarily those who are affected by the exercise of such power’ (Core Humanitarian Standard, 2014).

The 2016 Grand Bargain between donors and agencies includes commitments on transparency and participation (both referencing accountability). The commitment to realise a ‘participation revolution: to include people receiving aid in making the decisions which affect their lives’ seeks to promote the Core Humanitarian Standard as well as Inter-Agency Standing Committee (IASC) commitments on accountability to affected populations (Inter-Agency Standing Committee (IASC), 2016).

Applications

Despite the existence of common standards and definitions, a recent review of NGO approaches (Daoud, 2018) found inconsistent understandings of accountability. There have been significant investments in action and improvements in accountability in the sector. However, the 2020 Humanitarian Accountability Report, measuring performance against the Core Humanitarian Standard, found uneven progress—including poor progress on dealing with complaints (Knox-Clarke *et al.*, 2020). Similarly, the Grand Bargain annual review found that lack of strategic system-wide ‘real transformation in the way affected populations influence the aid they receive’ (Metcalfe-Hough *et al.*, 2020).

Disaster risk reduction models

Definitions and commitments

The Sendai Framework is clear that ‘disaster risk reduction requires an all-of society engagement and partnership’ involving representative participation of communities.

Recent United Nations Office for Disaster Risk Reduction (UNDRR) guidance on good governance in disaster risk

management (Amaratunga, Haigh, and Hettige, 2019) positions accountability as central, comprising:

- answerability – the need for justification of actions
- enforcement – sanctions if the actions or justifications are unsatisfactory
- responsiveness – the ability of those held accountable to respond to the demands made.

The International Organization of Supreme Audit Institutions (INTOSAI), set up the Accountability for Audit of Disaster Related Aid Working Group to enhance good governance and accountability, transparency, and anti-corruption in disaster risk management, supporting a ‘citizen-oriented perspective to enhance public accountability for a mutual relationship between the SAIs [supreme audit institutions] and citizens’. But application has been limited.

DRF models

There has been limited work to date to create a practical framework for DRF, but approaches are beginning to emerge.

MCII’s model (Forest, 2018) sets out transparency and participation as interlinked ‘determinants’ of accountability and all three concepts as ‘constituting dimensions’ of good governance.

The Start Network builds on this model in a discussion paper, using the idea of ‘docking points’ where accountability might fit into decision-making in DRF design and delivery (Harris and Jaime, 2019a), and noting a need for connection between them: a clear ‘line of sight’ between modelling and payout for end-to-end monitoring of performance (Harris and Jaime, 2019a; Harris and Swift, 2019).

Germanwatch, in collaboration with other organisations, has developed a human rights-based approach to climate and DRF. This proposes five principles for climate risk insurance that would ensure that they do no harm, and benefit the poorest and most-vulnerable. These are: non-discrimination and equality; participation and empowerment; transparency; accountability; and do no harm (Kunzel and Nzioki, 2020).

Table A.1: Summary of definitions of accountability, transparency, and participation

ACCOUNTABILITY	The process of using power responsibly, taking account of and being held accountable by different stakeholders, and primarily those who are affected by the exercise of such power.	Core Humanitarian Standard
	Ability of crisis-affected people to hold humanitarian actors to account for decisions that are made on their behalf.	ALNAP
	Process of holding actors responsible for their actions. Can be soft ‘answerability’ or hard sanctions or remedies.	A4EA
	A legal and social obligation on the part of those holding political, bureaucratic, or technical positions to carry out certain clearly defined responsibilities or functions. Involves answerability, enforcement, and responsiveness.	UNDRR
	Capacity and openness for being held responsible for executing power properly. Answerability and enforceability arising from transparency and participation. Consists of rights to make claims and demand a response and to involvement in ensuring related action is taken.	MCII (Forest, 2018)
SOCIAL ACCOUNTABILITY	About how citizens demand and enforce accountability from those in power.	Claasen and Alpín-Lardiés, 2010
	An approach that relies on citizens directly or indirectly participating in demanding accountability from service providers and public officials. Involves information, voice and negotiation.	World Bank
	Enabling civil society to engage with policymakers and service providers to bring about greater accountability for and responsiveness to citizens' needs.	Global Partnership for Social Accountability (GPSA)
PARTICIPATION	Including people receiving aid in making the decisions that affect their lives.	Grand Bargain
	Right held by all people to engage in society and in the decisions that impact their lives.	MCII (Forest 2018)
	Ability of crisis-affected people to make or influence decisions about the use of external funding.	ALNAP
	Expression of the right of those who are affected by a decision to be involved in the decision-making. Involves a spectrum of impact on a decision (see Figure A.1 below): informing, consulting, involving, collaborating with, and empowering people.	IAP2
TRANSPARENCY	A characteristic of governments, companies, organisations, and individuals of being open in the clear disclosure of information rules, plans, processes, and actions.	Transparency International
	Being open in the clear disclosure of information, rules, plans, processes, and actions.	MCII (Forest, 2018)

Figure A.1: The spectrum of public participation

INCREASING IMPACT ON THE DECISION					
	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities, and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision-making in the hands of the public.
PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed, and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions, and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

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Source: IAP2 (2018)

● SUMMARY REVIEW OF INSTRUMENTS

This annex presents a summary of instrument-specific findings relating to accountability. Information was gathered from a review of publicly available documents as well as a small number of interviews with experts. It is organised by function (risk retention and risk transfer) and then by primary channel (sovereign, institutional, and micro). The level of detail provided varies between the instruments, reflecting both the state of evidence and the state of accountability. It should be read as an initial review rather than a comprehensive analysis. Where possible, information has been provided about the entry points and provisions for accountability as well as challenges, gaps, and, where available, lessons learned.

Risk retention instruments

Risk retention instruments are pre-agreed financial commitments to take responsibility for costs in the event of a shock and can include:

- trigger-based reserve funds – where money is held in a specifically budgeted reserve account and released when triggers are met according to clear allocation processes (Meenan, Ward, and Muir-Wood, 2019)
- contingent loans – loans pre-agreed to be made available in the event of a disaster trigger being met; often arranged between IFIs and sovereigns on condition of a disaster risk management plan being in place.

Sovereign: Ethiopia's Productive Safety Net Programme Reserve Fund

Description

- Established by the Ethiopian government in 2005. Implemented by the Ministry of Agriculture and supported by a donor coalition. To date, almost exclusively donor-funded but in 2014/15 the government committed to a goal of government financing for the programme to reach an equivalent of 1% of gross domestic product (GDP) by 2025 (World Bank, 2017).
- Social protection programme to address chronic food insecurity in vulnerable *woredas* (districts), including shock-responsive mechanisms, enabling it to scale up to respond to transitory needs (Hobson and Campbell, 2012).
- Most recent phase (Phase 4, 2015–2020) included a continuum of four instruments (O'Brien *et al.*, 2018):
 - core regular transfers to households identified by communities as chronically food insecure
 - *woreda* and regional contingency budgets to respond specific shocks
 - a risk financing mechanism, triggered by an early warning system, to mobilise up to US\$80 million per year of in-principle donor commitments in the case of emergency that exceeds the capacity of the contingency budgets
 - in the event that needs exceed the mechanism's provisions, a humanitarian requirements document (akin to a humanitarian appeal) defines the needs for additional humanitarian support from donors.

Existing entry points for accountability

- Monitoring, evaluation and learning – as well as an established monitoring system, periodic impact evaluations are conducted and there are efforts to integrate learning from previous phases into subsequent ones. For example, the 2016 baseline evaluation highlighted that the programme was not reaching most food insecure people in certain pastoral regions and measures to address this were built into Phase 4 development.
- Payouts – complex institutional and implementation arrangements for governing and delivering the programme, but at the recipient-facing end, committees at *woreda* level are responsible for targeting the PSNP transfers. Kebele Appeals Committees (KACs) are responsible for hearing and addressing complaints regarding the delivery of payouts and issues are usually resolved at this level. These are linked to the government's emerging grievance redress mechanisms, which include the Ethics and Anti-Corruption Commission, the Ethiopian Institution of Ombudsman, and the regional and *woreda* grievance hearing offices. As the project is World Bank-funded, communities and individuals who believe that they are adversely affected also have recourse to the Bank's grievance redress service (World Bank, 2018).

Sovereign: Catastrophe Deferred Draw Down Option

Description

- A contingent financing line in International Development Association (IDA) loans, enabling a government to draw down immediate funds following a health, weather, or geophysical disaster once a pre-defined trigger—usually a government declaration of state of emergency—is met.
- The draw down amount can be up to the lower of US\$250 million or 0.5% GDP, repayable at regular IDA loan rates.
- To be eligible, countries must have a disaster risk management plan, periodically monitored by the World Bank (World Bank, 2018).
- Cat DDOs have been available under International Bank for Reconstruction and Development (IBRD) since 2008, extended to IDA countries in 2018. As at October 2020, Cat DDOs had been approved for 11 IDA countries. The covid-19 pandemic prompted a rise in agreement and disbursement of Cat DDOs: around US\$1.6 billion was disbursed between March and May 2020, and US\$35 million between June and September (Centre for Disaster Protection, 2020).

Existing entry points for accountability

- Cat DDOs are an add-on to development policy loan (DPL) agreements with governments, so the World Bank's Citizen Engagement Framework (see Annex 1) does not apply in the same way as it does to projects directly funded by the World Bank. The World Bank states that 'governments are responsible for engaging with citizens when designing a development policy financing project. The responsibility to initiate a participatory process and design its scope rests with the government, but the World Bank can facilitate, support, and advise on the engagement' (IEG and World Bank, 2018).
- The World Bank recognises the need for more citizen and civil society engagement in the development policy financing process to ensure transparency and accountability in the design, risk assessments and monitoring and evaluation (World Bank, 2015).
- As part of DPLs, Cat DDOs have three built-in entry points for accountability:
 - standard grievance redress clauses
 - operational policy, which guides the design of development policy financing, includes requirements for consultations to take place – a review of IDA Cat DDOs found nominal reference to consultations, but little detail of extent and outcomes, mostly noting alignment with the national development strategies' consultation processes; Cat DDOs are contingent on approval of a national disaster risk management plan, but beyond requirements for independent audit of accounts (see the [Malawi Cat DDO agreement](#)), accountability does not feature as a criterion for approving a plan
 - specified 'prior actions', which the government must undertake as a condition of financing – these can be classified as actions to enable state action and actions to enable citizen action (Grandvoinnet, Aslam, and Raha, 2015).

Analysis found very few examples of the latter, no examples of a holistic approach to combine state and citizen action, and minimal reporting of efficacy of prior actions in enhancing citizen engagement (IEG and World Bank, 2018). The Nepal Cat DDO (2020) suggests a consultative approach: 'All prior actions under this operation have been drafted after consultations with a wide range of citizens and community members including the most vulnerable community representatives, leaders, and private sector. The consultations took place at both the national and provincial level. In some cases, comments on the drafts were publicly solicited through the internet'.

Challenges, gaps, and lessons

- Documentation availability and accessibility. Financial tracking processes and requirements.
- Opportunities to strengthen accountability requirements at each of the three entry points to clarify and enhance citizen, state, World Bank accountability chain.

Meso: IFRC's Forecast-based Action Fund

Description

- Automatically releases funds when weather and climate forecasts meet a pre-defined trigger.
- In pilot phase between 2018 and 2020, as a ring-fenced component of the International Federation of Red Cross and Red Crescent Societies' (IFRC's) Disaster Relief Emergency Fund (DREF), which provides gap-filling loans or grants for national society responses to small to medium-scale disasters.
- To be eligible, Red Cross and Red Crescent national societies develop an Early Action Protocol (EAP), where early actions intended to reduce the impact of the forecast event are pre-agreed, as well as the trigger to release those actions and the funding.
- As at December 2020, the Forecast-based Action Fund (FbAF) had been triggered a total of six times since 2020: twice for early action in Bangladesh, twice in Mongolia, once in Ecuador, and once in Mozambique.

Existing entry points for accountability

- IFRC defines accountability as an 'ongoing process that creates relationships of respect between an organization and those affected by its work. In being accountable, one fulfils a commitment to enable and facilitate stakeholders to assess one's actions against defined commitments and expectations, and to respond to the assessment appropriately' (IFRC, 2020, p. 31).
- IFRC has clear commitments and frameworks for community engagement and accountability that apply across all of its action. Its 'wheel of accountability' has four segments:
 - setting expectations – clarity on what stakeholders can expect
 - information disclosure – actively allowing stakeholders to access necessary information
 - stakeholder evaluation – supporting stakeholders to assess the information
 - learning and improvement – considering assessments and responding appropriately.

- Currently there is no specific guidance on accountability for FbA, although guidance on engagement, monitoring, evaluation, and learning is included in the FbF manual (International Federation of Red Cross and Red Crescent Societies (IFRC), n.d.).
- At design/modelling stage opportunities for accountability include the following.
 - Feasibility study phase – exploration of viability and design options should involve wide, multistakeholder consultation by national societies, including national, local, and international experts, and disaster-exposed communities (IFRC, n.d.).
 - EAP – design should also be consultative, securing inputs and buy-in of authorities and communities including through extensive focus group discussions. EAP summaries are publicly available. If the FbAF is activated for an EAP, that EAP must be subsequently updated to integrate learning, and then revalidated in order to qualify for future funding.
 - Modelling and trigger design – involve 'ground-truthing' with communities; in Bangladesh, a national expert was highly instrumental in developing the forecasting models and setting the triggers, including by combining scientific modelling of rainfall and river discharges with information from local river gauges and household impacts. Unions were surveyed to understand behaviour and exposure to develop an impact curve accounting for household levels of exposure and likely resilience. In Mongolia, government *Dzud* forecasting models were the basis for consultations with communities on optimal timing and substance of early actions.
- At payout stage – standard complaints mechanisms apply, including hotlines, which are a key accountability modality across IFRC's programming, including FbF.
- Reporting and evaluation – national societies have to submit financial and narrative reports to IFRC within 90 days of the completion of FbAF action, in line with DREF funding agreements. Impact assessments are also undertaken to understand the value added of anticipatory action.

Challenges, gaps, and lessons

- Clarity on accountable party – in its pilot phase, FbA was an organisation-wide effort, with active involvement from HQ-based Climate Centre, DREF team, and several national societies. Accountability lines should become clearer as FbF ownership by national societies increases.
- Payout – despite routine use of complaints mechanisms, the extremely short implementation period in cases of rapid-onset actions (sometimes two-day lead times) makes meaningful response and remedy very difficult, except for most egregious misdirection of funds. Processes and mechanisms could be explored to front-load clarifying expectations around payouts, particularly around targeting, to pre-emptively address problems. IFRC is also exploring the idea of FbF for drought: in this slower onset context, a longer implementation time (possibly up to 14 months) offers greater opportunities for response and remedy.
- Monitoring and evaluation – a low-hanging fruit of accountability is closing the feedback loop with communities on action taken as a result of their inputs into impact evaluations. This also needs to allow space for answerability for those actions taken and not taken.

Meso: UN Central Emergency Response Fund anticipatory action

Description

- The UN-managed Central Emergency Response Fund (CERF) was established in 2006 as a pooled fund to mitigate unevenness and delays in humanitarian contributions.
- Managed by a dedicated secretariat within UNOCHA, it disburses funds to UN agencies through two ‘windows’: a rapid response window for sudden onset crises or sudden surges in need; and an underfunded emergency window for crises facing significant funding shortfalls.
- CERF began pilots in 2019 to formalise financing for anticipatory action, housed within the rapid response window, but with a distinct trigger-based mechanism. These pilots intended to provide learning about the potential niche for CERF in supporting anticipatory action, and what might be required for effective scale-up (UNOCHA, 2019). Pilots focused on the following.
 - Somalia – US\$15 million triggered in July 2020 for food insecurity anticipatory action by six UN agencies.

- Bangladesh – US\$5.2 million triggered for anticipatory action led by three agencies for flooding (2020).
- Ethiopia – pilot under development for drought; US\$13.2 million triggered for anticipatory action led by three agencies for drought during 2020; up to US\$6.8 million was planned for release in 2021 for additional activities, under the condition that forecasts reconfirm below average rainfall.
- Malawi – dual shock pilot framework under development for drought and dry spells.

Existing entry points for accountability

- The CERF Secretariat has a dedicated performance and accountability unit, which is responsible for its performance and accountability framework. This defines accountability as: ‘[a] process whereby public service organizations and individuals within them are held responsible for their decisions and actions. This includes their stewardship of public funds, fairness, aspects of performance, in accordance with agreed rules and standards, and fair and accurate reporting on performance results vis-à-vis mandated roles and/or plans’ (UNOCHA, 2010).
- The anticipatory action pilots are grounded in the strong commitment to learning that is embedded in CERF’s governance and ways of working. Mechanisms and processes associated with the review, audit, reporting, evaluation, and supervision of the CERF include: after-action reviews by receiving agencies; and the commissioning of three to five country-level independent reviews each year of CERF’s added value against an extensive set of criteria, which include transparency and accountability to affected people (UNOCHA, 2015).
- Specific to the anticipatory financing pilots, at design phase: in Bangladesh, the trigger was based on that developed by the Bangladesh Red Cross/Climate Centre, which (as noted above) included local expertise and consultation. It was also able to build on established FbF expertise and experience from WFP and the government.
- In Malawi, at time of writing, a survey was underway with at-risk communities to understand better what has worked well in the past and what has not, and what their anticipated needs in disaster are.

Challenges, gaps, and lessons

Lessons from the Bangladesh and Somalia allocations are, at time of writing (December 2020), emerging following process learning reviews conducted by the Centre for Disaster Protection. An initial summary of findings from Bangladesh (Gettliffe, 2020) included the accountability-relevant issues of:

- time and context constraints at the implementation stage – although there was a strong approach to identifying and targeting the most vulnerable people, in the event far fewer people received cash transfers than planned due to a combination of extremely tight timelines for verifying beneficiary lists, slow sub-contracting, and access restrictions owing to the covid-19 pandemic
- the need to find a balance between the imperative to create an operationally feasible pilot intervention to test the model, and to deploy a more consultative, bottom-up, needs-based approach
- in Somalia, the importance of stronger monitoring was noted to provide a better understanding of implementation and to ensure that the funds are being well targeted rather than used to fill gaps.

Micro: FAO Community contingency funds and caisses de résilience

Description

- Community contingency funds (CCFs) and caisses de résilience (CdRs) provide low-interest loans to their members, creating safety nets for small-scale farmers who lack access to conventional financial systems.
- CCFs were established in 2013 by FAO, operating in drought-prone areas of Honduras and Guatemala. Managed by a producers' association of member households with women making up 71% of membership. Funded by a mix of: member savings (40%), FAO funding (40%), and income generation projects. Activation occurs when the community declares an emergency situation, identified by means of an early warning system. Operating requirements include: establishment of good agricultural practices, parallel income-generating activities to recapitalise the fund, and early warning system and risk management plans (FAO, 2016b).
- CdRs involve a similar approach in Central African Republic, Chad, Liberia, Malawi, Mali, and Uganda (FAO, 2016a). The financial instrument is part of an integrated approach that also involves a technical sustainable agriculture dimension and a social cohesion dimension. The approach can be replicated, adapted,

and scaled up to be integrated into larger resilience programmes, and as such, to involve a wider range of NGO, government and UN agency partners. The nature of the financial mechanism depends on the context and can involve village savings and loans associations, or solidarity funds or rotating savings and credit associations.

Existing entry points for accountability

- As a member-owned community-based fund, mutual accountability, transparency and community-based participation are integral to the design and management of the fund. Members are expected to actively participate in the design and governance of the CCF and community facilitators are trained in management of community savings and loans systems (FAO, 2016b).

Challenges, gaps, and lessons

- There is little information in the public domain beyond summary booklets, case studies, and promotional videos. No evaluations were found in a web search but, at least in the case of the CdR, this may be because these are integrated into evaluations of bigger programmes, for example, the evaluation of WFP and FAO's support to vulnerable populations in northern Mali.

Sovereign, institutional, and micro: risk transfer instruments

Risk transfer instruments transfer part of the risk to a third-party insurer or investor in return for an annual premium payment. This way, they redistribute the infrequent and unmanageable costs of low-frequency/high-severity crises, into regular manageable payments.

- Risk pools – where a number of institutions/entities group together to access the benefits of jointly pooling and managing their risks. This often involves purchasing insurance, with the pool effectively becoming the insurance company group. The pool retains some of the risks itself and transfers others (through reinsurance or other instruments) to third parties (e.g. African Risk Capacity (ARC)).
- Global funds that transfer risk to investors – trigger-based global funds for specific purposes, which are financed through a combination of public investment and transfer of risk through insurance or bonds (e.g. Pandemic Emergency Financing Facility (PEF)).
- Microinsurance – provision of insurance to transfer risks associated with disasters from poor and vulnerable households that would otherwise not have

access to insurance. This can be through individual insurance contracts with insurance companies or through membership of mutual insurance organisations (where the policyholders own the premiums and risk transfer, e.g. Centre for Agriculture and Rural Development Mutual Benefit Association (CARD MBA)).

Sovereign: Risk pools - African Risk Capacity

Description

- Established in 2012 by the African Union, ARC aims to help African governments improve disaster preparedness and planning, as well as access to timely financing for response to extreme events.
- It comprises ARC Ltd, the financial insurance provider, and the ARC agency to support member states' disaster risk management capacity.
- The Africa Risk View (ARV) provides risk modelling and data with models reviewed by the ARV advisory panel and the ARC technical review forum.
- In its first six years (2014/15 to 2019/2020) ARC had a total of 13 participating countries: Burkina Faso, Kenya, Mali, Malawi, Mauritania, Senegal, The Gambia, Cote D'Ivoire, Niger, Chad, Zimbabwe, Madagascar and Togo—the last six of which joined in the 2019/2020 pool. Only Senegal has been in the pool for the full six years.

Existing entry points for accountability

- Transparency – the publication of a transparency policy in 2018 marked a step forward following a 2017 evaluation, which found weaknesses in this regard (Oxford Policy Management (OPM), 2017). Under this policy, there is a general commitment 'to disseminate information to the public by other means such as hard copy publications and informative documents, social media, press releases, conferences, meetings, and workshops'. Availability of basic information regarding payouts to members and documentation of their implementation plans remains limited (see below) but has improved over recent years: a 2018 study (Forest, 2018) only found one final implementation plan online, but by 2020 all were accessible.

- Grievances – ARC does have an externally managed whistleblower hotline for government officials and implementing agency staff to anonymously report misuse of ARC payouts. Additional complaints mechanisms depend on the member country: in Kenya, ARC payouts are linked to the national Hunger Safety Net Programme (HSNP), which has grievance and complaints committees and water resource user associations that aim to be age and gender-balanced (NDMA, 2017, p. 50, cited in Kunzel and Nkiozi, 2020).
- Gender – although the ARC guidelines for members' contingency plans broadly requested that they needed to pay attention to gender equality and social inclusion in their targeting criteria (ARC, 2015, p. 31, cited in Kunzel and Nkiozi, 2020, p. 15), previous studies found no evidence of this being a part of sovereign risk pool implementation (Arias, 2014, cited in Oxfam, 2018; de Janvry, Ramirez, Ritchie, and Sadoulet, 2016). ARC's experience in Senegal highlighted the need for gender sensitivity, particularly in trigger modelling and vulnerability analysis. ARC has now published its first gender strategy and action plan (ARC, 2019), and appointed a director-level gender lead. The strategy notes 'it is impossible to build the resilience of nations and communities to disasters without the equal and active participation of men and women in DRM [disaster risk management]' (ARC, 2019, p. 12). It locates seven entry points in the ARC project cycle, including:
 - approval of members' operational plans
 - composition of the ARV customisation review committee
 - reporting of final implementation.

The strategy proposes a robust monitoring and evaluation system to track gender equality mainstreaming and integrate learning. Monitoring will include tracking the implementation of the members' final implementation plans, noting that 'data will systematically be documented and reported by the countries and implementing partners [... on] how different groups participate in, and benefit from, the implementation of plans funded by ARC payouts' (ARC, 2019).

Challenges, gaps, and lessons

- ARC contracts are entered into by elected governments, presenting a pathway to citizen accountability. However, this is not built into the design of the agreements and an evaluation of ARC found ‘strong evidence to suggest that civil society and NGOs have often not meaningfully been involved’ (OPM, 2017). A 2018 analysis of available operational and final implementation plans found several nominal references to engagement with NGOs, but minimal detail as to the extent and depth of this (Forest, 2018). There is no requirement to measure the involvement of affected people or advocates in decision-making (Kunzel and Nzioki, 2020, p. 18).
- The 2017 evaluation concluded that ARC’s efforts in terms of transparency and communication were perceived as weak, lacking effective efforts to inform stakeholders and others (OPM, 2017), although as noted above there have been improvements since, including the publication of a transparency policy in 2018.
- Understanding lines of accountability can be difficult: given involvement of private risk modellers, risk pools, and sovereign government, the issue of where accountability lies has been raised. Although contracts set out clear responsibilities between parties, it can be difficult for those outside, including civil society, to navigate. Forest (2018) notes that financial transparency is a recurrent issue among risk pools, some of which argue that this is a question of client confidentiality—certain information cannot be published without a waiver being signed by governments, and should instead be accessed via national budgets. However, budget monitoring in many of these contexts is ‘challenging and unlikely to be timely’ (Forest, 2018).
- While there have been improvements in transparency with regards to the availability of documentation and models, gaps remain in terms of content, communication, and accessibility. Topline figures for payouts to countries are, mostly, publicly available, but not further details on the ultimate use of funds. The ARV model is customised to the local context in a year-long process carried out by the national technical working group, comprising implementing agencies and local governments in member countries. The results of this process are then reviewed by the ARV customisation review committee. Working models, datasets, and documentation are available on request, but are not accessibly published, nor is information on the nature, extent, and depth of engagement in each country, which would allow for scrutiny and ground-truthing of models.
- When a payout is anticipated, the ARC Secretariat supports the country in drafting and reviewing the final implementation plan. Although there are no procedural barriers to the participation of affected people in this process, it is not an ARC stipulation, and the responsibility for active inclusion and invitation lies with governments (Kunzel and Nkiozi, 2020, p. 16). A study of ARC in Kenya suggests financial and logistical challenges in bringing community members to workshops but notes ongoing efforts by the National Drought Management Authority (NDMA) to invest in overcoming these (Kunzel and Nkiozi, 2020).

Sovereign/Meso - Pandemic Emergency Financing Facility (insurance window)

Description

- Established in 2016 by World Bank to provide financial support to IDA-eligible countries in case of major multi-country disease outbreaks.
- Designed to pay out at both sovereign and institutional levels: i.e. to IDA eligible countries and to PEF-accredited responding UN agencies (WFP, IFRC, World Health Organization (WHO), UNICEF, United Nations Population Fund (UNFPA) and FAO).
- Following the extensive payouts from the insurance window in 2020 triggered by the covid-19 pandemic, there are no plans to renew the PEF, including the insurance window after the current bonds and swaps expired in mid-July 2020. However, its experience can be instructive for any future initiatives to structure global risk transfer instruments, from an accountability perspective as well as the more widely critiqued effectiveness perspective.

Entry points for accountability

- Allocations, which were made via the PEF Trust Fund to the responding agency or government are subject to the same processes as other World Bank projects—that is, they must comply with a set procedure that includes approval of a stakeholder engagement plan, a social and environmental review, as well as inclusion of a standard grievance mechanism.
- Activation criteria were based on pre-defined parametric triggers, which are detailed in the operations manual.

Challenges, gaps and lessons

- Most PEF recipient countries only provided nominal indication that a stakeholder engagement plan and social and environmental review have been or are being prepared. The documentation for Tanzania appears to be an exception in providing a little more explanation in its documentation: in the context of its US\$3.79 million payout for covid response it notes the time constraints for completing these meant that: ‘The speed and urgency with which this project has been developed to meet the growing threat of COVID-19 in the country, combined with recently-announced government restrictions on gatherings of people has limited the project’s ability to develop a complete SEP [stakeholder engagement plan] before this project is approved by the World Bank’ (World Bank, 2020b).
- The PEF was upwardly accountable to its steering body composed of donors (Australia, Germany, and Japan), international organisations (including WHO, UNICEF, and the World Bank), and two IDA-eligible countries (currently Haiti and Liberia). Only the summary financial report of the annual report is available online.
- Responding agencies, not countries, must submit an implementation report regarding use of the PEF funds received, but these do not yet (at time of writing, six months after disbursement) appear to be readily available in the public domain.
- There is not a specific PEF payment dashboard for monitoring or tracking funds. Instead, country-specific allocation documents with financial and narrative details can be found in the World Bank country documentation and UNOCHA’s Financial Tracking Service (FTS) for transfers made to UN agencies. As at the end of July 2020, US\$195.84 million had been transferred to support covid responses in 48 countries, according to World Bank press releases—but it demands deductive investigation to find out which these 48 countries were.

Macro/meso: ARC replica - WFP and Start Network

Description

- ARC Replica is both a programme and a product, providing drought insurance across Africa. Under the ARC Replica programme, WFP and the Start Network (Replica partners) work in partnership with ARC member states to design an ARC policy and prepare to meet the needs of the most vulnerable if the policy triggers a payout. The Replica partners can purchase insurance cover through ARC Ltd, just like member states.

- When a country has an ARC policy purchased by a government and an ARC Replica policy purchased by WFP or Start Network, more coverage is available for the benefit of people exposed to drought risk. When a country’s model triggers, ARC pays out to both the government and the Replica partner to implement their pre-agreed contingency plans.
- ARC Replica is currently active in six countries: Burkina Faso, the Gambia, Mali, Mauritania and Zimbabwe (covered by WFP) and Senegal (covered by the Start Network). In 2019, policies were triggered to pay out US\$10 million to Start Network in Senegal, and smaller payouts in Mauritania and Zimbabwe to WFP to provide support for communities at risk of drought.

Existing entry points for accountability

- The Replica instrument benefits from the accountability and peer review mechanisms of ARC.
- In the modelling stage, in Senegal, the ARV model is ground-truthed through community-centric comparative monitoring, feeding into adaptations of the model (O’Sullivan Winks, 2020). Data is gathered from 22 ‘sentinel’ sites across the country on such issues as livestock health and access to water.
- In overall design, the Replica instrument is part of a wider layered approach to risk, and links to other risk financing instruments, including the Start contingency fund or forecast-based financing, to cover some basis risk and other needs outside the scope of the instrument’s coverage.

Challenges, gaps and lessons

- As Start is a network of agencies there is no single approach to accountability; alignment between agencies in monitoring and evaluation would improve the robustness and comparability of data.
- Learning from the Start Network has also shown that accountability has a better opportunity to develop when it builds on learning year on year. Inconsistencies in the purchase of policies between years disrupts community engagement and accountability processes and the availability of human resources to drive accountability.
- Although the contingency plans are pre-agreed, there is some flexibility to make adaptations, and adaptations were made in 2020 due to covid-19. However, the six-month implementation window and pre-agreed budget allocation leave little space for programme changes based on community input.

Micro: R4 Rural Resilience Initiative

Description

- A multifaceted programme that integrates micro-level risk reduction, retention, and transfer mechanisms to support farming communities to increase their food security and income by managing climate-related risks. It is designed to be participatory and context-specific, and supports farmers to diversify their livelihoods, increase their savings, and get access to microcredit and affordable index-based insurance.
- The programme started out in 2009 as the Horn of Africa Risk Transfer for Adaptation (HARITA) project in one village of 200 farms in Ethiopia—a collaboration between Oxfam America, the International Research Institute for Climate and Society (IRI), and other partners.
- In 2011 it became R4, with the involvement of WFP. After a successful expansion under the global partnership, Oxfam America transitioned into an advisory role in 2018, with WFP taking the lead on the management and scale-up of R4 operations globally. In 2020, R4 reached about 190,000 farmers in Burkina Faso, Bangladesh, Ethiopia, Kenya, Malawi, Madagascar, Mozambique, Senegal, Zambia, and Zimbabwe. Since 2011, participating farmers have received over US\$3.4 million of insurance payouts to compensate for weather-related losses.

Entry points for accountability

- Design and modelling – product design, validation and seasonal assessment involves consultation with local communities and stakeholders in all R4 countries, to ensure thorough understanding and buy-in. For instance, in collaboration with ACToday, there are initiatives underway in Ethiopia to systematically engage farmers in the design and gathering of data for the insurance component in order to improve accuracy, minimise basis risk, and ensure that farmers have an active engagement in, and understanding of, the risks that are covered. This is in response to experience of the problems of sole reliance on satellite data, and uses crowdsourcing methods. A platform is being developed that will allow farmers in each village to use phone technology to participate in the design and verification of the satellite-based insurance for their village. Farmers could provide information via text messages, forms, phone apps, or by pressing numbers in response

to questions asked in local languages. All this takes place in structured village ‘town hall’ exercises where participants reconcile the satellite data with their collective experience (Fiondella, 2020). It is linked to activities to build the index design capacity of local stakeholders in Ethiopia with a view to ultimately handing over design and distribution of microinsurance (WFP, 2020).

- Payouts and design – WFP carefully reviews seasonal assessments by IRI and other index providers to judge the accuracy of payout calculations. WFP also analyses the insurance payout distribution processes and level of satisfaction among farmers through beneficiary contact monitoring (BCM) surveys. BCMs provide a deeper understanding of participants’ perspectives on the access to, use of, satisfaction with, and accountability of, the insurance payout process. BCMs are also an opportunity for participants to highlight not only the problems they have found on the withdrawal process but also to suggest areas where the product can be improved in next rounds to increase its effectiveness. Surveys are usually conducted one month after insurance payouts are disbursed and are aimed at informing and orienting the initiative to the real needs and perceptions of the population served (WFP, 2020).
- Complaints mechanisms – WFP’s complaints and feedback mechanisms are used across its programming, including the R4 programme. The mechanisms are adapted to the area of intervention and include toll-free hotlines, community feedback sessions, help desks, and suggestion boxes.
- Monitoring, evaluation, and learning – the R4 programme is rolling out monitoring, evaluation and learning that has a strong participatory dimension, and is designed to inform strategic and operational decisions as well as to contribute to global evidence-building. Ongoing and *ad hoc* monitoring and evaluation is complemented by externally-led research pieces to ask specific questions such as ‘What are the major factors that influence willingness to pay for insurance?’.

Challenges, gaps and lessons

- Despite the high level of participation built into the project, surveys conducted in several countries revealed the continued need to invest in information sharing to build farmers’ understanding of the insurance component.

Micro: CARD MBA mutual microinsurance in the Philippines

Description

- Mutual insurance is owned by its policyholders, who manage the company. There are five distinctive features of mutual insurance that bake in democratic accountability (CISL, 2019):
 - member ownership
 - democracy – members can exercise democratic rights on ultimate decision-making
 - solidarity – mutual support, sometimes beyond the purely commercial terms
 - created for specific group and purpose
 - not-for-profit.
- The Philippines has one of the world’s largest microinsurance sectors, organised mainly in community mutual benefit associations, which are major providers of post-disaster support, including and beyond insurance payouts.
- The Centre for Agriculture and Rural Development Mutual Benefit Association (CARD MBA) is one of the largest providers of mutual microinsurance. It covers 20% of the population, with 35% of its members living below the national poverty line.
- The insurance is tied to a microfinance scheme: people who join the microfinance scheme take out compulsory life insurance and become members of CARD MBA.

Existing entry points for accountability

- CARD MBA members are organised in community centres of up to 30 policyholders, where transactions are made weekly. Each community centre is supervised by an account officer employed by the local CARD NGO or bank office. Members own the insurance pool. Community centres are usually in the house of a member, are easy to get to, and create close ties of support. Members participate in the governance of CARD MBA through local community centre admin and volunteering, and through a national board of trustees.
- A network of 2,000 volunteer coordinators validate the claims, aiming for payout within 24 hours. CARD MBA estimates that it provided services to almost 180,000 highly affected members through insurance payments and emergency relief goods in the wake of Typhoon Haiyan.
- CARD MBA members can take complaints directly to account officers during weekly meetings—this was found to be the preferred method of raising issues. CARD MBA also has a chat tool linked to its social media accounts, and has also set up a customer relations call centre that deals with complaints (CISL, 2019).

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