

LIFT Accountability Framework DRAFT – September 2013

Introduction

LIFT employs a number of mechanisms to ensure that LIFT-funded partners are accountable to the Fund Manager and to the donors of LIFT, including: a) regular field trips by the Fund Manager and the Fund Board; b) reports submitted to the Fund Manager twice a year; and, audits carried out by an external audit firm. However, less attention has been given to encouraging accountability to local partners and to beneficiaries at community level. Addressing this gap is a priority of the donors to LIFT, who are guided by the Paris Declaration and the Accra Agenda for Action, which call for donors and partners to be mutually accountable for development results.¹

This framework establishes a set of principles and mechanisms for increasing accountability to people and organisations at the periphery of the power and influence that comes from controlling and managing LIFT funds. In developing this framework: global standards have been reviewed; existing mechanisms in Myanmar have been surveyed and around 50% of LIFT local partners have been interviewed. Consultations will take place before the draft mechanism has been put into practice.

The primary purpose of the proposed Accountability Framework is to assure LIFT's accountability to local stakeholders. The secondary purpose is to strengthen the ability of local partners and communities to voice their opinions/concerns and demand redress where needed.

The Framework

There are four “**fields of accountability**” loosely based on the dimensions of other international accountability mechanisms²:

- a) **Transparency.** Key information about LIFT and the projects it funds should be presented to stakeholders in languages, formats and media that are accessible, comprehensible and useful to them.
- b) **Consent.** LIFT should ensure that stakeholders consent to their participation in projects, and that they are satisfied with their representation in project design, implementation, monitoring and evaluation.
- c) **Feedback/grievance.** All local LIFT stakeholders should be aware of their right to express feedback/grievance and of the channels for doing so, including direct access to the LIFT Fund Board and the Fund Manager.
- d) **Competence.** LIFT representatives who interact with stakeholders should always behave professionally, should be trained and skilled in participatory approaches, and should promote and apply the LIFT Accountability Framework.

The above principles or fields of accountability should apply to all relationships within the chain that connects the donors to LIFT with its ultimate beneficiaries. This chain normally involves the following stakeholders:

- Fund Board (appointed by the donors to LIFT)
- Fund Manager (UNOPS)
- Contracted implementing partners (IPs)

¹ The Accra Agenda for Action reaffirms the objective of strengthening partner countries' ownership of their development strategies and strengthening the ties making governments accountable to their domestic constituents. It also broadens the concept to include engagement with parliament, political parties, local authorities, the media, academia, social partners and broader civil society.

² Interaction, Sphere and HAP Guidelines and Benchmarks have been considered in preparing this Framework. HAP has a fifth area that is named “learning” - continuous improvement of accountability.

- Local partners of contracted LIFT IPs (at national, regional, community levels, depending on the project)
- Beneficiaries of LIFT-funded activities at community level

From consultations with stakeholders, the LIFT Beneficiary Accountability should play particular attention to accountability towards the last two groups of stakeholders in the above list (i.e., to communities and to local partners of contracted LIFT IPs). The following two tables propose minimum standards of accountability that should be applied in relationships with these two groups of stakeholders.

Table 1: Accountability to communities

	Proposed minimum standards of accountability	Proposed assurance/monitoring activities
1. Transparency (information)	<ul style="list-style-type: none"> • In agreement with its IPs, the FM makes public the names of its partners, the main activities, and a financial summary of the projects it funds. • IPs provide core LIFT and project information to communities (through local partners) in local languages. 	<ul style="list-style-type: none"> • Enquiries by FB members during project visits • Findings from mid-term and final evaluation reports (both evaluations of LIFT and of individual LIFT-funded projects)
2. Consent (representation)	<ul style="list-style-type: none"> • Situation assessments are documented and shared with community representatives. • A range of interest groups (by wealth, gender, etc.) are consulted and adequately represented. • The FM works with its partners to ensure projects are in line with the local context. 	<ul style="list-style-type: none"> • Inception reports or community profiles are developed that describe the community by interest group and identify group representatives. • Reports of implementing partners that include descriptions of how the process of consultation was carried out.
3. Feedback	<ul style="list-style-type: none"> • LIFT establishes a robust complaints/feedback mechanism that reaches the highest level of LIFT governance³. • IPs and/or their local partners set up complaints/feedback procedures that are in line with the LIFT mechanism and are based on the preferences of communities. 	<ul style="list-style-type: none"> • Annual IP reports include a summary of community feedback/ activity giving information on how many complaints received, how many of them solved and how many on-going. The reports should also include IP learning and adaptations made.
3. Competence of staff	<ul style="list-style-type: none"> • IP staff who have direct contact with communities are skilled/ trained in participatory approaches, and promote and apply the LIFT Accountability Framework. 	<ul style="list-style-type: none"> • Feedback of communities on staff members of the project through the feedback mechanism.

Table2 : Accountability to local partners

	Proposed minimum standards of accountability	Proposed assurance/monitoring activities
1. Transparency (information)	<ul style="list-style-type: none"> • In agreement with its IPs, the FM makes public the names of its partners, the main activities, and a financial summary of the projects it funds. • The commitments of contracted IPs to their sub-contracted partners are documented along with how these commitments will be met. • Allowable indirect costs⁴ on LIFT 	<ul style="list-style-type: none"> • Documents uploaded on LIFT website and circulated among partner organizations. • Records of FM meetings with sub-contracted partners of contracted IPs. • Findings from mid-term and final evaluation reports (both evaluations of LIFT and of individual LIFT-funded projects)

³ A draft complaints/feedback mechanism is attached in Annex 1.

	Proposed minimum standards of accountability	Proposed assurance/monitoring activities
	projects are shared equitably between contracted IPs and their sub-contract partners.	
2. Consent (representation)	<ul style="list-style-type: none"> • IPs develop and put in place processes to enable their local partners to influence every stage of the project cycle. • The FM enables the local partners of contracted IPs to influence the design of LIFT programmes. 	<ul style="list-style-type: none"> • Local partner representation in project management structures and systems is recorded in FM project monitoring reports. • Local organization capacity assessments (where conducted) and capacity-development plans are documented, budgeted, and shared with local organization representatives.
3. Feedback	<ul style="list-style-type: none"> • LIFT establishes a robust complaints/feedback mechanism that reaches the highest level of LIFT governance⁵. 	<ul style="list-style-type: none"> • Minutes of Fund Director’s regional meetings with local partners. • FM focal person for local organisations is in direct contact with local partners annually. • Annual or six-monthly FM reports include a summary statement of local partners’ feedback activity and their feedback/ suggestions to FM and FB.
4. Competence of staff	<ul style="list-style-type: none"> • FB members and FM staff who have direct contact with stakeholders are skilled/trained in participatory approaches, and promote and apply the LIFT Accountability Framework. 	<ul style="list-style-type: none"> • The FM prepares a report each year that documents examples from programme staff of success and challenges in participatory monitoring and feedback. • Feedback of partner organizations on staff members of the FM through the feedback mechanism.

⁴ “In partnerships and consortiums, the 6% indirect costs should normally be shared among implementing partner organizations including local CSOs proportionate to their implementation budget (6% of their total budget)”. LIFT Operational Guidelines, article 6.2.

⁵ A draft complaints/feedback mechanism is attached in Annex 1.

Annex 1 – Proposed LIFT Community Feedback Mechanism

I. Policy Statement

Ensuring accountability to stakeholders, especially local partners and beneficiaries, is an integral part in the development of civil society in Myanmar. LIFT’s current strategy recognizes that there is a need to promote institutional capacity and to strengthen the resilience of local partners and this community feedback mechanism is expected to strengthen the capacity of local partners and communities to voice concerns and demand redress.

II. Scope and Principles

This mechanism enables beneficiaries and local partners to voice their complaints, concerns and suggestions concerning LIFT’s policies and procedures, including the manner in which the Fund Manager (FM) performs its duties. The mechanism is intended to cover the following matters:

- Commitments of LIFT that all projects must be able to:
 - Demonstrate how activities will benefit the poor and vulnerable
 - Develop baselines and conduct evaluations that focus on vulnerable households as ultimate beneficiaries; and
 - Ensure they work with different levels of local groups and organizations, and support their technical, organizational and networking capacity, and its application.
- The communication between LIFT (comprising Fund Board members) and implementing partner organizations and local partners (sub-contracted partners).
- Performance of LIFT functions, duties including alleged wrongdoing or inappropriate behavior by staff of the FM.
- The policies, procedures, and systems set by the FM.

LIFT ensures that all feedback will be handled in line with the following principles:

Confidentiality	Confidentiality is the core value of LIFT’s feedback mechanism and thus, the identity of the individual who gives feedback or a complainant will be recorded in the system for the purpose of dealing with the complaint, but will not otherwise be disclosed without consent, or where it is necessary to investigate the complaint.
Responsiveness	All feedback (including complaints) towards LIFT will be acknowledged and dealt with in a timely and courteous manner. If it is a complaint, LIFT will try to resolve at the earliest opportunity wherever possible to the satisfaction of the complainant as far as practicable and the complainant will be regularly updated with the complaint processes.
Accountability	The policy itself is to ensure downward accountability of LIFT towards its local partners and the communities that LIFT’s partners are dealing with. The decisions made by the feedback working group in dealing with a complaint pursuant to this policy will be fair, objective and consistent, taking into account all relevant circumstances, factors and available evidence.
Visibility and Accessibility	LIFT’s feedback policy and procedures will be made public on its official website www.lift-fund.org and www.lift-fund.net and through other materials. The information in this policy will be made as understandable as possible in both English and Myanmar languages, to clearly outline the process of giving feedback. The policy shall be distributed to all employees and contractors as part of the induction process.
Efficiency and Effectiveness	All feedback including complaints, concerns and questions will be acknowledged as soon as it is received by LIFT. They are seen as an opportunity for LIFT to gain valuable insight into, and improve the quality of LIFT’s support towards the local civil society and poor and vulnerable people in Myanmar. When complaints are received, they will be resolved in an effective matter in accordance with LIFT feedback policy and procedures.

III. Means of feedback and their procedures

Through the discussions with local partners, LIFT has identified the following means of feedback and made them available for its local partners to give feedback, to complain, to raise their concerns, queries and/or give suggestions.

1. A channel where diverse opinions/suggestions are welcomed with no response needed

LIFT will establish a focal person, who is there for communication with the local partners. That person is there to listen to the partners and get direct information from them. The existence/ appointment of that person is well circulated among local partners and s/he can be invited to partners' offices to discuss/ get suggestion concerning the projects. His/her office should be always open and welcoming to all local partners.

2. Individual occasional visit (of an assigned focal person) from LIFT listening to feedback of local partners in person understanding their situation and comforting their worries

The same focal person appointed from LIFT (just for the communication with local partners) will go to the head office and field offices of the local partners, meet with staff members and the beneficiaries separately leaving LIFT's phone no. at his/her visits explaining they can call the FMO anytime to give feedback.

3. Local level informal meetings at least bi-annually

The LIFT FM will organize informal meetings at the local level (in project implemented areas) with its direct and sub implementing partners to listen to their constraints, concerns and how LIFT could solve those issues in line with the FM's policies and procedures. Management of the FM will get involved in this as the main organizer. These meetings will be held bi-annually and be informal so participants feel free to speak and discuss their projects.

4. Formal complaint mechanism

A. Written feedback procedures

LIFT will provide envelopes designed by the LIFT communication department and the following will be printed on the folded envelope;

- Vision, Goal and Purpose of LIFT
- Date
- Name (Optional)
- Gender
- Age
- Address
- Occupation
- Name of organization (if working for a CSO)
- How they want an answer (Tick an option they chose): staff member of LIFT will come and present the final solution; by means of meeting; by announcing publicly; by telephone; by letter; and by e-mail.
- Space to write their feedback, concerns, queries, complaints and suggestions. It will be clearly stated that the complainant must write their suggestions on how they think the issue should be resolved (if they have a pre-considered solution).
- Printed return address for the FM

An A4 paper will be folded into the shape of an envelope with a double tape sticker which can be used to close the envelope at the end. If there is not enough space for the complainant to write his/ her feedback, they can use extra paper and put it in the envelope and send back to the printed address of the FM. All these envelopes will be made available at the offices of partners and local partners and among community members through FM staff during their field visits and through partner projects.

B. Verbal feedback procedures

The LIFT FM will accept verbal feedback as well by phone. A LIFT hot line will be made available for its direct partners, sub-contracted local partners and concerned beneficiaries. Assigned LIFT focal person will record the feedback as per the format mentioned in written form for further action.

- The focal person will identify the person who gives feedback, get the contact details of the person
- Confirm the feedback details
- Ensure their preferred means of response from the FM
- Explain the steps it would take to solve the issue and
- Acknowledge their attempts to give feedback towards LIFT

C. Internet feedback procedures

LIFT will mention the contact details of an assigned focal person who will organize all the feedback that comes through the internet (e-mail) on its official website www.lift-fund.net and www.lift-fund.org. The individual who would like to give feedback must complete the feedback form which will be uploaded on the web under the ‘tab, “Contact”’.

Feedback handling processes

All the feedback that comes to LIFT through different modes will be first identified as positive feedback (compliments), negative feedback (complaints), concerns, enquires, and suggestions. Nevertheless, all the feedback will be acknowledged based on different modes they are received within 5 days period. They will be recorded in the feedback register with a unique identification number. If necessary, a file on the complaint will be retained.

When the feedback has been identified into different types, the concerns, enquires, compliments and suggestions will be referred to specific individuals and departments and/or some will be mentioned in specific papers and reports to enhance LIFT’s activities. The relevant focal persons and departments will then reply directly to the person in line with LIFT policies and procedures.

However, the complaints will be analyzed and investigated through a Feedback Handling Board (FHB). Members of FHB will be elected. FHB will comprise of two representatives from the FMO⁶, two representatives from INGO partners, two representatives from LNGO partners, three individuals from civil society, who are non-partners of LIFT, but are well respected and trusted by CSOs in Myanmar. The term of FHB is 2 years.

Role of feedback handling board (FHB)

Members of FHB will meet quarterly or as requested by the LIFT focal person to ensure the following processes:

- Ensure that the complaint is valid (within the scope and parameters of LIFT’s services) by defining criteria of valid complaints.
- Identify the seriousness of the complaint and gather sufficient information about the complaint in order to properly investigate and respond (Eg. Information about the issue, individuals and organizations involved, timing, etc.,). This information must be recorded in the feedback register.
- The investigation will be objective, impartial and managed confidentially in accordance with privacy obligations.
- Consent of the LIFT Fund Director obtained in case an FM staff member(s) have to be investigated.
- Make sure that the investigation aims to resolve factual issues and consider different options for complaint resolution and future improvement.
- Make certain that the response to the complaint is timely, clear, informative and efficient.

⁶ The Programme Officer (Civil Society Partnerships) is the focal point for local organisations, and thus will not be a member of the FHB.

In case the complainant is not satisfied with the response, internal or external review of the decision may be offered. External review options include going to Myanmar NGO Watch Group, the press, etc.

IV. Feedback register

Feedback Register is maintained by the assigned focal person of LIFT and should include the following information:

- Feedback Identity No.
- Date and mode of complaint received
- Gender, age, address
- Occupation of complaints and/or Name of organizations
- Complained issue and its nature
- Findings from investigation team
- Relevant Department responsible for reply
- Required action and resolution time frame
- Status report that outlines how the issue has been solved and responded to the complainant

The assigned focal person of LIFT provides the complaints register and a brief summary of new issues and complaints to the FHB on a quarterly basis as part of their complaints report.

Review for continual improvement

LIFT continually seeks to improve the effectiveness and efficiency of its feedback policy and procedures. It is also vital for LIFT to know the consequences of the feedback handling processes on the complainants and the individuals or organizations involved in the process. LIFT's focus on civil society strengthening requires it to invest in strong and constructive working relations between international and local civil society in Myanmar.

Therefore, there will be a regular review process⁷ from the FB or the assigned focal point of LIFT to analyse the how LIFT's response to feedback and action on complaints effects the partnership between the parties (organizations and individuals from local and international civil society groups) that are the subject of a complaint.

⁷ Regular review may involve separate discussion or informal meetings between two parties with the LIFT appointed focal person analyzing their partnership practices.