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Evaluation of WFP Policies on Humanitarian Principles and Access in Humanitarian Contexts

Evaluation Report

Prepared by GPPI and Humanitarian Outcomes: Julia Steets, Claudia Meier, Adele Harmer, Abby Stoddard, Janika Spannagel

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Evaluation management

Director, Office of Evaluation

Andrea Cook

Evaluation Manager

Gabrielle Duffy

Research Analysts

Mar Guinot, Marte Hurlen

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Executive Summary

Introduction

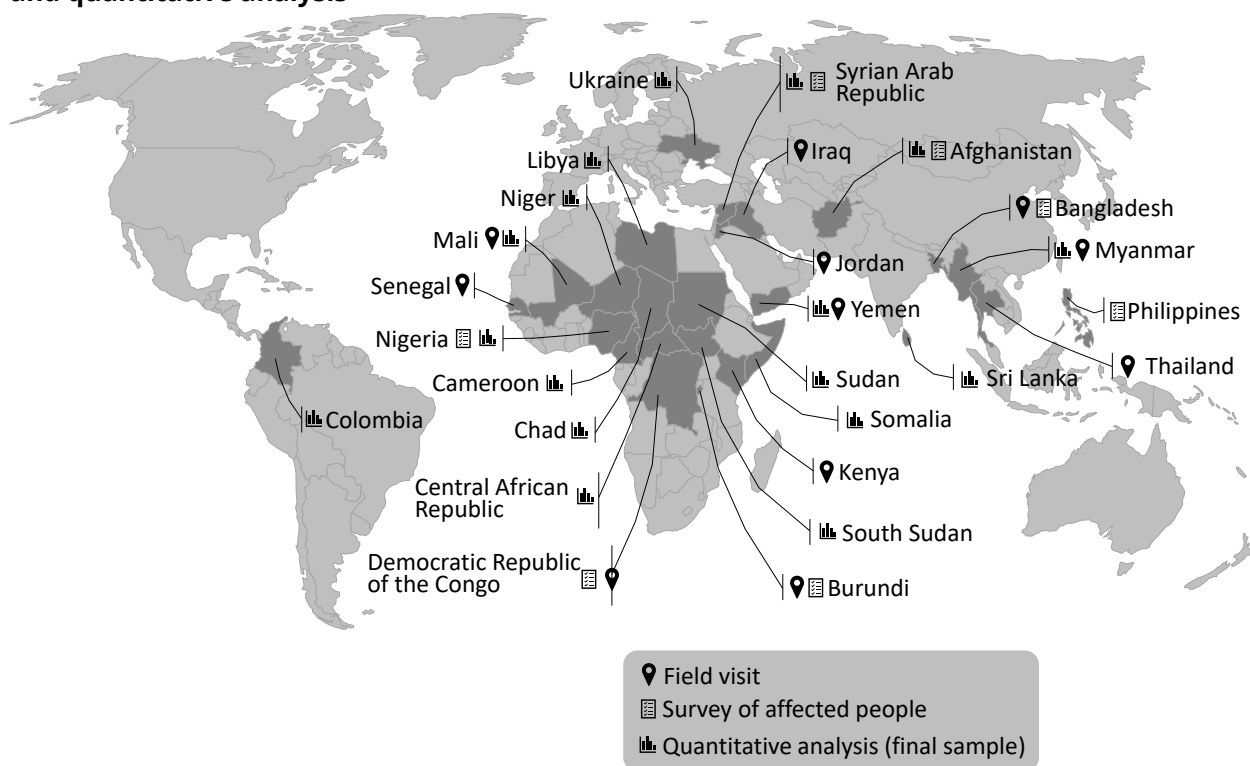
Evaluation features

1. WFP's policies on humanitarian principles¹ and humanitarian access² were approved by the WFP Executive Board in 2004 and 2006, respectively.
2. Adherence to the core humanitarian principles of humanity, impartiality, neutrality and operational independence and the ability to gain access to those in need of assistance are central to WFP's operations. In accordance with the WFP requirement that policies be evaluated within four to six years of the start of their implementation, this evaluation provides an evidence-based assessment of the policies' quality, WFP's performance on humanitarian principles and access and factors affecting results.
3. The evaluation focused on the period 2012–2017. It was conducted between March and December 2017 by a four-person team that collected evidence at the global, regional and country levels through:
 - a document and literature review including over 100 project documents, related evaluations, policies and guidance;
 - field visits to country operations in Yemen, the Democratic Republic of the Congo, Iraq, Bangladesh, Mali and Burundi and four regional hubs (in Dakar, Nairobi, Amman and Bangkok);
 - over 440 key informant interviews with WFP staff at headquarters, regional bureaux and country offices and with partners and donors;
 - electronic surveys with over 1,300 staff and partners;
 - telephone surveys with over 2,500 affected people in six countries;
 - analysis of media, social media and complaints and feedback mechanism data;
 - network analysis; and
 - quantitative analysis of WFP's coverage of needs and factors potentially influencing access.

¹ "Humanitarian Principles" (WFP/EB.A/2004/5-C).

² "Note on Humanitarian Access and its Implications for WFP" (WFP/EB.1/2006/5-B/Rev.1)".

Figure 1: Geographic scope of field visits, surveys of affected populations and quantitative analysis



4. Findings from the various data sources were triangulated during the analysis phase to reach consensus on findings and conclusions. In addition to the usual confidentiality arrangements for evaluations, the evaluation team ensured that no context-specific information drawn from interviews was included in the report so as to mitigate risks to participants and thus gain access to relevant sensitive information.
5. The evaluation team applied a gender-sensitive approach and adopted measures to ensure that as far as possible men and women participated in the surveys, interviews and workshops in equal proportions. Differences in the responses of men and women and other relevant groups were systematically analysed.
6. The evaluation was coordinated with an evaluation of WFP’s humanitarian protection policy, a summary report on which will be presented for consideration by the Board at its 2018 second regular session.
7. Limitations of the evaluation included a lack of direct interviews with affected people; use of a snapshot analysis and observation-based indicators in the quantitative analysis; exclusion of some interview data after the revision of confidentiality arrangements; and changes to the field mission schedule. Despite these limitations, the evaluation team developed valid findings and conclusions.

Context

8. *More protracted emergencies and greater politicization.* WFP’s implementation of the policies on humanitarian principles and access since their adoption has increasingly taken place in the context of complex and protracted conflict-related crises. WFP has responded by shifting its approach from food aid to food assistance, with a significant increase in cash-based transfers. The protracted nature of crises has also given the debate on linking humanitarian and development programmes a new impetus, through the “New Way of Working” initiative, for example. Furthermore, WFP has aligned its strategic planning with the

Sustainable Development Goals. The integration of these very different agendas raises important questions for the application of humanitarian principles.

9. *Increasing obstacles to access.* At the same time, the fragmentation of armed groups, numerous attacks against humanitarian workers, counter-terrorism legislation and increasingly sophisticated government restrictions have rendered access negotiations more complex. This has resulted in an increased focus on access by WFP and the wider humanitarian community, including through programme criticality assessments that aim to balance security and humanitarian programme requirements. Despite these efforts, many international humanitarian organizations have less and less direct contact with affected people, particularly in highly insecure contexts.
10. *Emerging realization that principles entail trade-offs.* There is an emerging realization that the application of humanitarian principles may entail trade-offs. Many organizations are still reluctant to acknowledge this, however, and further debate is required.

WFP policies on humanitarian principles and access in humanitarian contexts

11. *Humanitarian principles.* In its 2004 Statement of Humanitarian Principles³ WFP committed itself to the core humanitarian principles of humanity, impartiality and neutrality. Later, in its Strategic Plan (2014–2017), it amended these three principles to reflect WFP’s shift from food aid to food assistance and added operational independence as a fourth humanitarian principle that would guide its work. The Statement of Humanitarian Principles also includes five “foundations of effective humanitarian action” and two “standards of accountability and professionalism”, which are not the focus of this evaluation. WFP’s definition of the core humanitarian principles (see box below) is closely aligned with the definitions found in international humanitarian law and adopted by various members of the humanitarian system, including the United Nations, the Red Cross and Red Crescent Movement and many non-governmental organizations. The document is a statement of—rather than a policy on—humanitarian principles and as such does not discuss application of the principles in practice or include an implementation plan.

WFP’s definition of the core humanitarian principles

Humanity: WFP will seek to prevent and alleviate human suffering wherever it is found and respond with food assistance when appropriate. It will provide assistance in ways that respect life, health and dignity.

Impartiality: WFP’s assistance will be guided solely by need and will not discriminate in terms of ethnic origin, nationality, political opinion, gender, race or religion. In a country, assistance will be targeted to those most at risk, following a sound assessment that considers the different needs and vulnerabilities of women, men and children.

Neutrality: WFP will not take sides in a conflict and will not engage in controversies of a political, racial, religious or ideological nature. Food assistance will not be provided to active combatants.

Operational independence: WFP will provide assistance in a manner that is operationally independent of the political, economic, military or other objectives that any actor may hold with regard to areas where such assistance is being provided.

Source: WFP Strategic Plan (2014–2017)

12. *Access.* WFP’s 2006 Note on Humanitarian Access and its Implications for WFP⁴ focuses on access by humanitarian organizations to people in need. The note stresses that it is not possible to standardize WFP’s approach and does not prescribe how WFP should strengthen

³ “Humanitarian Principles” (WFP/EB.A/2004/5-C), paragraph 14.

⁴ (WFP/EB.1/2006/5-B/Rev.1).

its capacity to negotiate context-specific access. It does, however, identify matters considered crucial for access. These include situation analysis, security awareness and management, partnerships and learning and training.

Findings

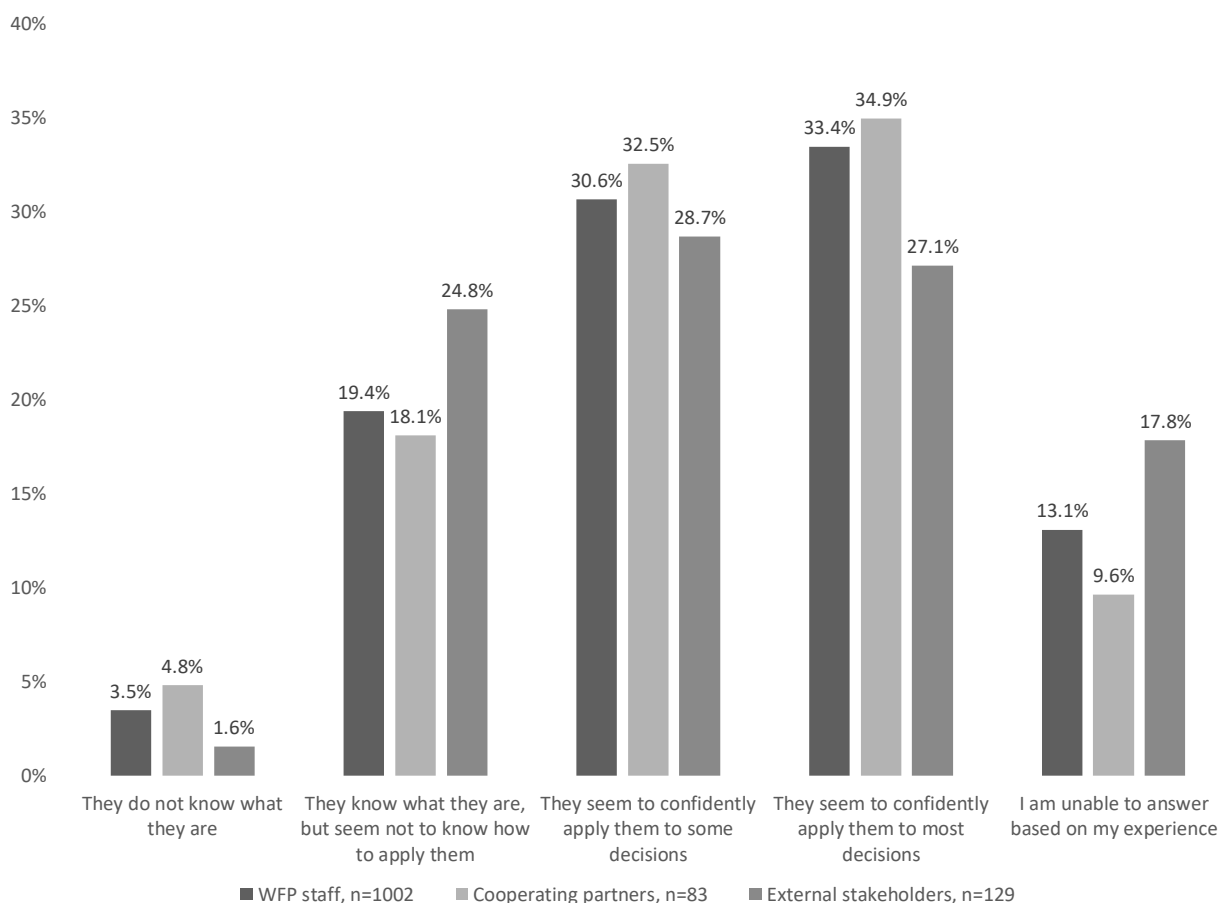
Quality of the policy documents and implementation measures

Humanitarian principles

13. The evaluation team finds that the Statement of Humanitarian Principles remains a relevant confirmation of WFP's adherence to the foundational principles of the humanitarian system but fails to meet the standards of a fully-fledged policy. The document presents the four core principles together with other corporate standards and thus risks diluting their importance. Moreover, it does not distinguish between the emergency and development activities of WFP's dual mandate, nor does it articulate how potential tensions between principles could be addressed or how, for example, WFP's work through government agencies in conflict settings might be reconciled with the principles of independence and neutrality.
14. The Statement of Humanitarian Principles and other WFP policies on matters such as gender and humanitarian protection largely support and reinforce each other. There are unacknowledged tensions, however, arising for example from the application of a gender transformative approach, which in certain contexts may be perceived as creating confusion.
15. *Access.* The Note on Humanitarian Access and its Implications for WFP is based on a review of WFP experiences and is largely coherent, including with WFP policies on matters such as its enterprise risk management. The evaluation team finds that the analysis of obstacles to access, the division of labour in access negotiations and the practices and approaches that are important for access remain relevant. The document does not, however, provide any guidance on how to deal with trade-offs and compromises that might be necessary to secure principled access.
16. *Policy implementation.* Neither of the two policy documents prescribes measures for implementation. Initially, WFP did not allocate dedicated resources for policy implementation and instead treated protection activities as one way of operationalizing the humanitarian principles.
17. Since 2014 there has been a marked increase in access activities. WFP has invested USD 550,000 from extrabudgetary resources in efforts to document lessons learned; the creation of an advisory group and an operational cell on access; the designation of access focal points in some regional bureaux and country offices; access training and support missions; the development of operational guidance on humanitarian access; and the launch, together with other leading humanitarian organizations, of the Centre of Competence on Humanitarian Negotiation. The evaluation team found little evidence of any impact of these activities on field operations to date. Moreover, while many WFP staff welcomed this recent increase in efforts, a majority of interviewees said that humanitarian principles and access did not receive adequate corporate attention and support.
18. *Awareness.* Dissemination of the Statement of Humanitarian Principles is not supported by operational guidance, and the evaluation team found it to have been ineffective. As a result, the level of understanding of the humanitarian principles is highly variable across the organization. Twenty-five percent of staff members interviewed displayed only partial knowledge of the core humanitarian principles, despite pre-briefings in several field

locations. Of the various stakeholder groups responding to the survey, between 20 and 25 percent stated that WFP staff did not know how to apply the principles (Figure 11).

Figure 2: Survey responses on how well WFP staff understand humanitarian principles



19. Regarding access, a majority of interviewees understood well the different roles of humanitarian coordinators, the Office for the Coordination of Humanitarian Affairs and WFP in access negotiations, as well as the responsibility of country directors for decisions affecting humanitarian principles and access. The evaluation team found that the vast majority of access questions were discussed at the country level and that the networks of staff drawn on for access advice were highly decentralized. Moreover, the involvement of WFP headquarters and access to senior management on particularly sensitive access issues was uneven. As a result, the understanding of certain aspects of WFP’s approach to access was inconsistent, for example with regard to whether WFP should engage with non-state armed groups.
20. *Application of the policy to partners.* WFP relies heavily on partners and commercial providers to deliver its programmes, but the evaluation team found few active efforts to encourage them to apply the policies. While field-level agreements with non-governmental organizations include references to impartiality and some aspects of neutrality, contracts with commercial suppliers do not include equivalent provisions. Non-governmental organization partners reported that training, workshops and conversations with WFP focused mostly on technical issues rather than on strategies, approaches or principles. Many partners said that having access to operational areas was a key criterion for selection as a WFP partner and felt compelled to maintain access even where doing so required a compromise with regard to humanitarian principles. The same partners said that their

adherence to humanitarian principles was not important in WFP's due diligence and partner selection.

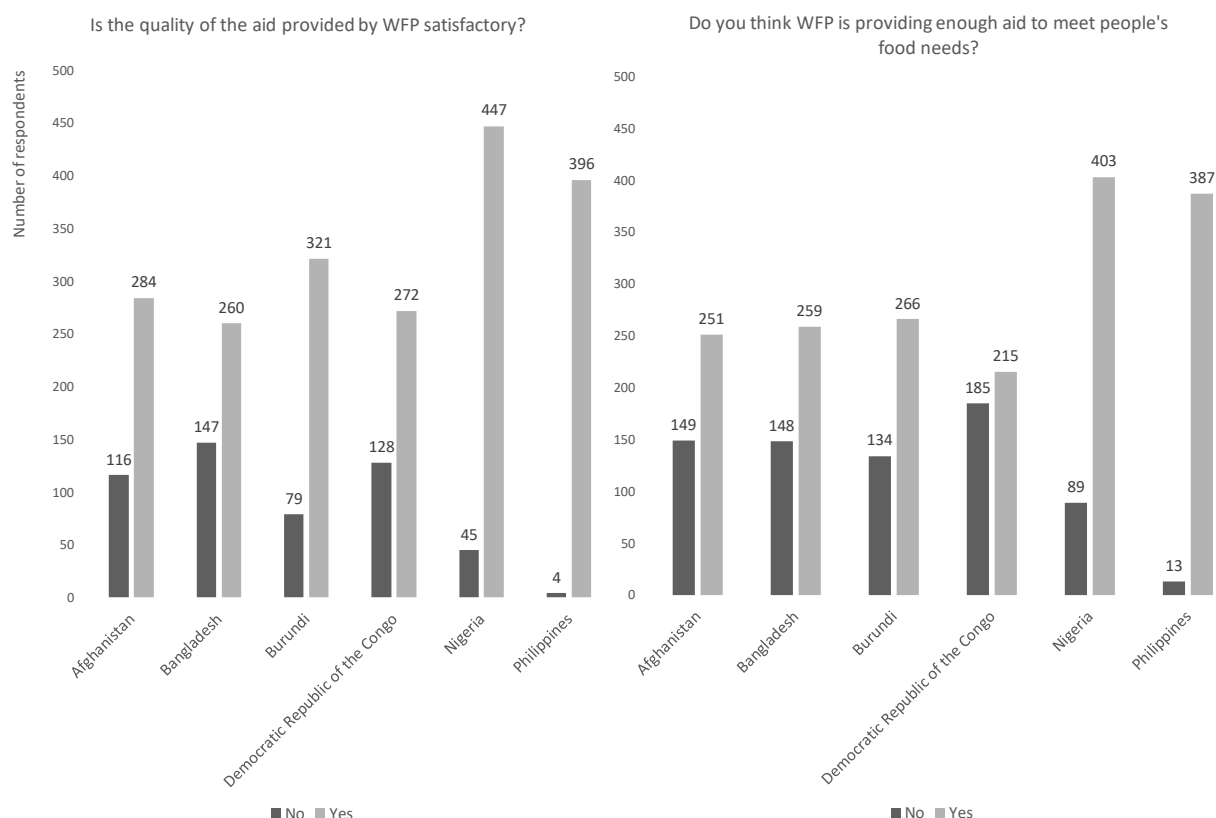
WFP's progress on humanitarian principles and access

21. *Obstacles to access* were found to be frequent, with 20 out of 22 evaluations of WFP's emergency operations and the same number of project reports mentioning access difficulties. The types of obstacles faced by WFP have remained similar over time. Frequently identified obstacles include visa and food import restrictions, infrastructure problems, government restrictions and conflict.
22. *Current levels of access.* The evaluation team found that access restrictions had the most severe effect on needs assessments and monitoring. Partners clearly recognized WFP for its strong needs assessment capacity. To strengthen assessments in areas with limited access, WFP has invested in technological solutions; however, significant challenges linked to the reliability and quality of assessment data were highlighted in the majority of operations visited for this evaluation.
23. The evaluation team also identified insufficient WFP field presence for monitoring as a problem in almost all contexts visited, despite investments in third party monitoring: 56 percent of WFP staff members and 68 percent of external stakeholders interviewed were critical of WFP's monitoring practices. Third party monitors often lack the information about WFP's activities necessary to monitor effectively. In addition, data was mostly quantitative and not always easily triangulated.
24. Regarding access for delivery of food assistance, available data showed that WFP and its partners performed particularly well in difficult operating environments. In 2016, WFP and its partners assisted an average of 40 percent of people in need in countries identified as experiencing access challenges, compared to just over 10 percent globally.⁵ Within those countries, coverage was found to be higher in insecure areas and in areas with difficult logistical conditions. The evaluation team also found a strong and positive relationship between WFP staff presence and its coverage of total needs, as well as a strong correlation between coverage and the availability of non-governmental organization partners. By contrast, coverage did not appear to be directly affected by other factors such as the presence of integrated peacekeeping missions, the level of engagement of other humanitarian organizations, the level of funding per person in need, the level of travel restrictions or the number of staff at the province level.
25. Interviewees stressed the important role that WFP, as leader of the Global Logistics Cluster, plays in facilitating the access of other organizations. Ninety-three percent of interviewees provided positive feedback on these services. Nevertheless, apparent coverage gaps remain. Thirty-five percent of stakeholders interviewed for this evaluation stated that there was no access to significant areas with high needs in their countries of operation, and 47 percent (58 percent among WFP staff) said that at least pockets of people were not being reached by WFP or its partners.
26. Progress on the humanitarian principles was found to be uneven. Performance against each principle is discussed in the following paragraphs.
27. *Humanity.* The evaluation found that due to the nature and the scale of assistance delivered WFP enjoyed a generally positive reputation. The majority of affected people surveyed were satisfied with both the quantity and the quality of assistance delivered (

⁵ Based on food security needs data as reported in the Humanitarian Response Plan and WFP beneficiary numbers for food distribution as reported in WFP's standard project reports. Global data from *WFP Year in Review 2016*.

28. Figure 15). The echo of WFP’s operations in the media and on social media was largely positive. Survey participants gave humanity the highest rating of all the principles. Ninety percent of WFP staff and 71 percent of external respondents said that WFP “always” or “usually” designed and delivered assistance in a way that respected the dignity of affected people.

Figure 3: Aid recipient perceptions of quantity and quality of aid delivered

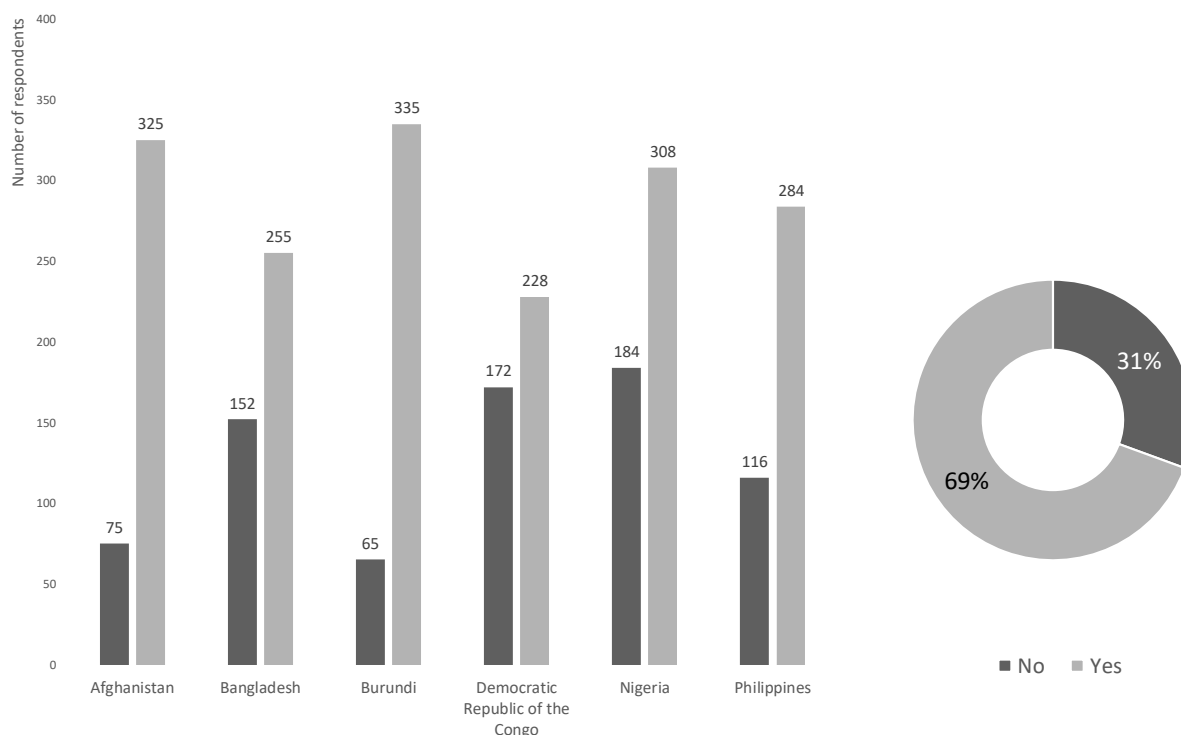


29. Within this positive picture, quality issues emerged as the most important limitation, raised in nearly all operations visited for this evaluation. These included delayed or incomplete distributions, inappropriate types of food, lack of food diversity and low-quality, expired or rotten food. Many interviewees linked these problems to WFP’s perceived prioritizing of quantity over quality. Some cooperating partners, for example, criticized WFP for what they saw as its reluctance to pay more to improve the quality of its programming. Partners also linked quality issues—particularly disappointed community expectations due to delays and irregular distribution—to problems in WFP’s planning and processes for communicating with partners.

30. Community information, feedback and complaint systems are crucial for tracking and potentially improving the quality of aid. Affected people rated WFP’s systems positively, with 66 percent of men and 61 percent of women surveyed reporting that community members were able to give their opinions on WFP’s programmes, make complaints and suggest changes. Nevertheless, there were indications that accountability to affected populations required further improvement and that more effort could be made to achieve gender balance in community outreach. Other concerns include significant variability in current partner practices in accountability to affected populations, overlaps and duplication between WFP and partners’ mechanisms and gaps in the systematic analysis and use of beneficiary feedback data.

31. *Impartiality.* The evaluation team found that WFP had a relatively strong reputation on the principle of impartiality. Staff and partners had a clear understanding of what impartiality entailed and demonstrated a high level of buy-in to the principle. The majority of affected people surveyed found that WFP provided assistance impartially, albeit with significant differences among countries (Figure 19). Crucially, none of the data collection and analysis tools used in the evaluation provided any evidence that WFP had deliberately discriminated against any group or individual or that it would do so.

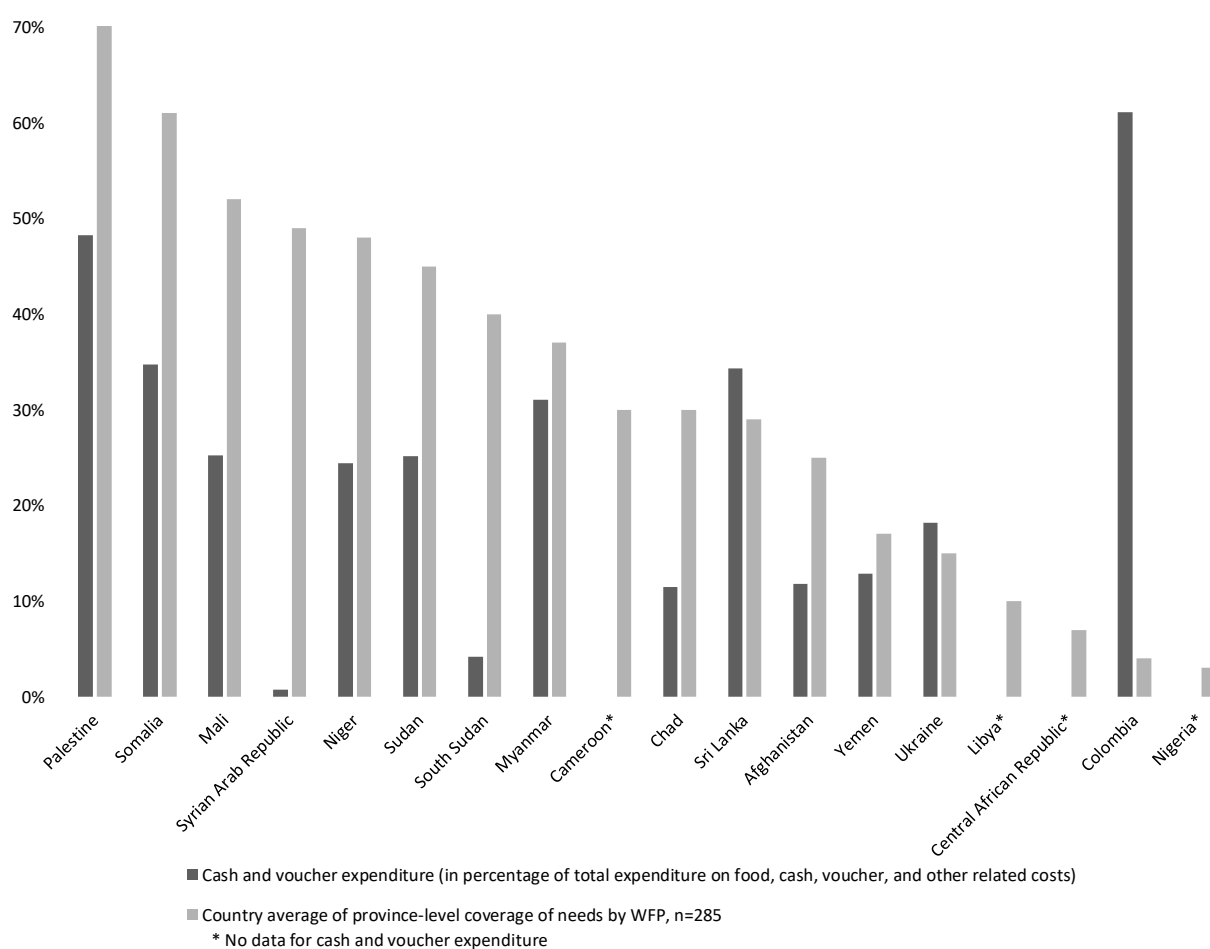
Figure 4: Affected people’s answers to the question “Do you believe WFP provides aid impartially, without favouritism, based on need alone?”



32. However, the evaluation team found weaknesses regarding impartiality. Available data suggested that current coverage of food security needs was highly uneven at the global level (Figure 5). The unevenness persisted when data on WFP’s cash programmes were considered as well. WFP had limited flexible funding at its disposal, and there was little evidence of such funding being used strategically to correct global coverage imbalances. Moreover, earmarked funding continued to restrict WFP’s room to manoeuvre, especially in vulnerable and volatile contexts where flexibility was paramount, as noted in a number of evaluations.⁶

⁶ “Synthesis report of operations evaluations (2016–2017)” (WFP/EB.2/2017/6-B).

Figure 5: Average WFP coverage of food security needs

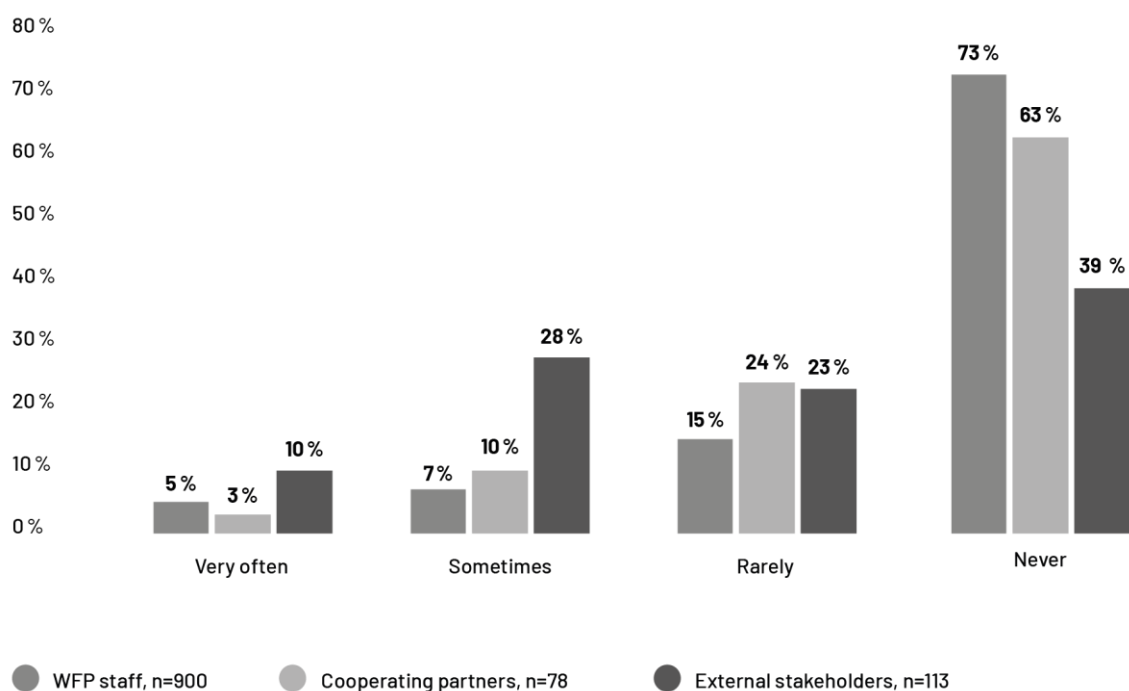


33. The evaluation team also found uneven coverage of food security needs within countries. Food Security Cluster needs and coverage data from some major operations revealed areas where emergency food security needs were severely under-covered (reaching less than 10 percent of people in need), as well as areas where coverage was extremely high (reaching 100 percent of people in need or more). This suggested that WFP could be more active in addressing imbalances by, for example, using data more strategically, identifying coverage gaps to guide funding allocations and requesting donors for less earmarking and greater flexibility to reallocate resources to underserved areas. Currently, WFP also lacks a clear corporate stance on how to handle attempts by host governments or *de facto* authorities to influence needs data and beneficiary selection.
34. *Neutrality.* WFP's neutrality tended to be perceived less positively, especially by external stakeholders (

35. Figure 25). Among affected populations, 46 percent of survey respondents said that WFP was working to help one side in the conflict win. The main reason for WFP's perceived lack of neutrality was its close relationships with governments, particularly in situations where governments were party to ongoing conflicts. This was further confirmed in nine of 11 evaluations⁷ that discussed the role of the host government, questioned whether WFP cooperated too closely and indicated that at times governments exerted influence over operations and restricted assistance for specific groups. Interviewees linked WFP's close cooperation with host governments to its status as a United Nations agency, the lack of a clear distinction between development and emergency operations and WFP's limited role in advocating the application of and raising host government awareness of the humanitarian principles.

⁷ Evaluations raising criticisms: 1) Final Evaluation (2014) "Mozambique, Protracted Relief and Recovery Operation 200355, Assistance to Vulnerable Groups and Disaster-affected Populations in Mozambique: An evaluation of WFP's Operation (2012–2014)"; 2) Evaluación de la operación (2016) "Operaciones prolongadas de socorro y recuperación – América Central 200490 Restablecimiento de la seguridad alimentaria y los medios de subsistencia de los grupos vulnerables afectados por crisis recurrentes en El Salvador, Guatemala, Honduras y Nicaragua (2014–2016)"; 3) Country Portfolio Evaluation (2017) "Sri Lanka: An Evaluation of WFP's Portfolio (2011–2015)"; 4) Country Portfolio Evaluation (2013) "Sudan: An evaluation of WFP's Portfolio 2010–2012"; 5) Country Portfolio Evaluation (2012) "Afghanistan: An Evaluation of WFP's Portfolio"; 6) Emergency Evaluation (2015) "An Evaluation of WFP's Regional Response to the Syrian Crisis, 2011–2014"; 7) Operation Evaluation (2014) "Kenya, PRRO 200174, Food Assistance to Refugees: An Evaluation of WFP's Operation (2011–2013)"; 8) Operation Evaluation (2016) "Ukraine – EMOP 200765 Emergency Assistance to Civilians affected by the conflict in Eastern Ukraine November 2014–December 2015"; 9) Évaluation d'opération (2014) "Mali, opération d'urgence 200525, "Assistance pour les populations affectées par la crise au Mali: personnes déplacées, familles hôtes, et communautés fragiles (2013–2014)". Evaluations highlighting positive aspects: 10) Operation Evaluation (2014) "Kenya, PRRO 200174, Food Assistance to Refugees: An Evaluation of WFP's Operation (2011–2013)" and 11) Operation Evaluation (2014) "Philippines, Protracted Relief and Recovery Operation PRRO 200296: Support for Returnees and Other Conflict Affected Households in Central Mindanao, and National Capacity Development in Disaster Preparedness and Response 01 May 2012 to 30 April 2014".

Figure 6: Survey responses on how often WFP takes sides in a conflict or engages in controversies of a political, religious or ideological nature



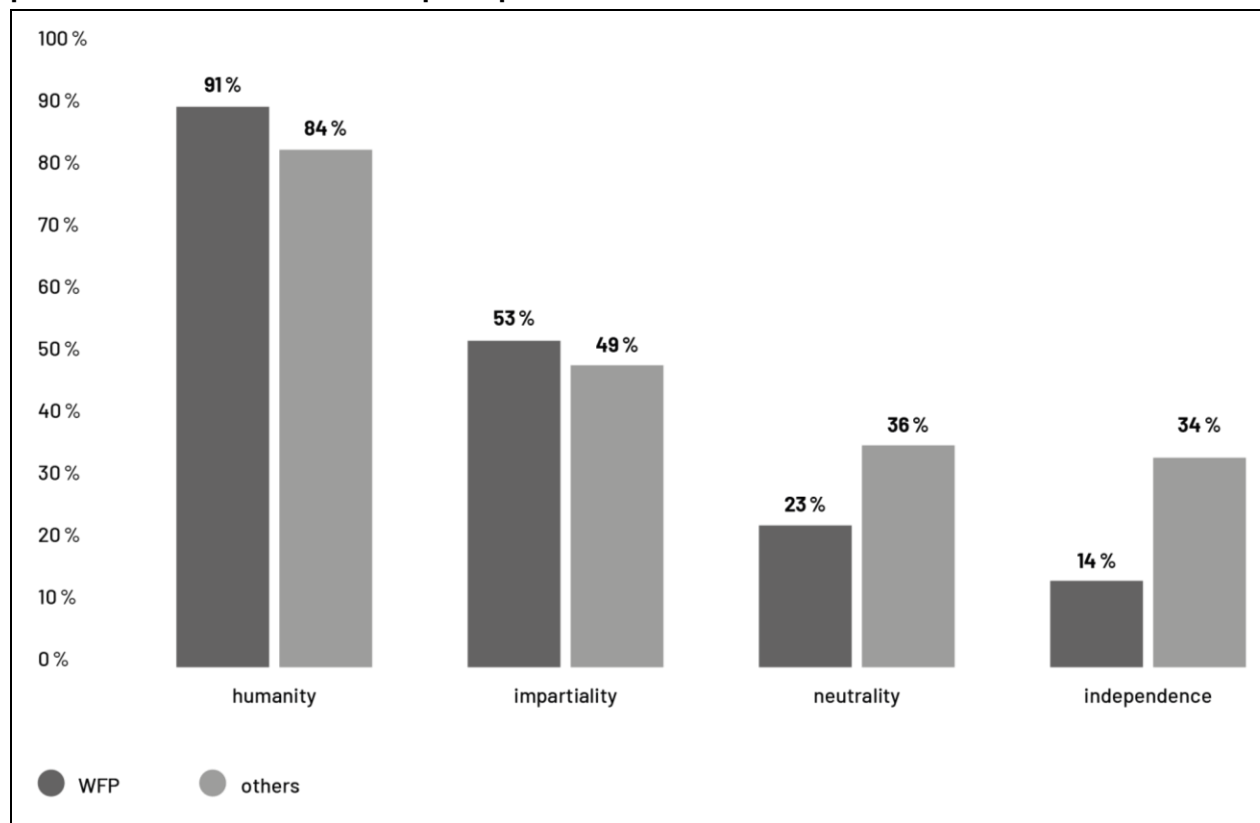
36. Another reason for WFP’s perceived lack of neutrality was its reliance on the use of armed escorts (in certain settings), which a majority of interviewees (70 percent) considered to be problematic. In many contexts, in line with the United Nations’ security management system, WFP routinely uses armed escorts provided by peacekeeping missions, private contractors or government forces. The evaluation identified good practices in some countries that demonstrate how WFP can influence the decisions of the United Nations’ security management system so that they are better aligned with humanitarian principles by, for example, avoiding armed escorts. WFP’s own security capacity is not always sufficient, however, or adequately utilized for this purpose.
37. *Operational independence.* This is the least understood of WFP’s core humanitarian principles. Staff members demonstrated various understandings of independence, including as referring to the importance of having an independent logistics capacity, the requirement to separate their personal or political convictions from their jobs, and a variation of impartiality and the requirement to provide assistance based solely on need. The evaluation team found that WFP’s potential exposure to the political interests of donors was high. In addition, the dependence of WFP on a small pool of donors for much of its funding and the steadily declining share of multilateral and fully unearmarked contributions (6.45 percent of contributions in 2016)⁸ poses a potential risk to operational independence. While interviewees and survey respondents indicated that donor pressure on WFP to follow non-humanitarian objectives was relatively rare, there is little evidence of WFP refusing donor funding, even when tied to conditions. While the majority of affected people surveyed believed that WFP was independent of its donors, many interviewed staff and partners said that WFP was donor-driven and hesitant to better use its strategic position to influence donors.

⁸ WFP’s Use of Multilateral Funding: 2016 Report (available at <https://docs.wfp.org/api/documents/WFP-0000019524/download/>)

Explanatory factors

38. Interviewees frequently mentioned WFP's mandate to provide food assistance as one of the most important factors facilitating the organization's access to people in need. This is due to the relatively uncontroversial nature of food assistance (as compared to protection, for example); the ability to use even short windows of opportunity to distribute food in an area; and the popularity of food as a commodity, which increases its acceptance but can also attract efforts to manipulate or divert it.
39. The evaluation team found that WFP had an organizational culture that often gave precedence to humanity and access over, and at times in trade-off of, other longer-term considerations, including WFP's perceived neutrality, independence and impartiality. Factors driving this culture include the organization's pride in its ability to deliver in challenging environments and incentives for prioritizing delivery. As a result, interviewees clearly view WFP's performance on humanity more positively than they view its performance on the other humanitarian principles (
40. Figure 29).

Figure 7: Share of interviewees expressing a positive or very positive opinion about WFP's performance on humanitarian principles



41. WFP relies heavily on partners for access to operational areas and assistance delivery. Adherence to humanitarian principles was constrained, however, by weaknesses in partner selection and management and monitoring of partner activities, combined with strong competition among partners and pressures on price. Survey respondents identified private contractors and cooperating partners as the actors most likely to accept problematic compromises in order to achieve access. With regard to private contractors, particularly

transport companies, interviewees criticized WFP's lack of oversight and control over their business practices such as the handling of road checkpoints.

42. Strategic relationships with host governments often facilitate government authorizations and enhance WFP's access. However, these same relationships may in some contexts undermine the perception of WFP's neutrality and the impartiality of assistance. This is particularly true when WFP does not actively advocate principled engagement. WFP's practice of continuing to deliver through government agencies in some conflict contexts may also interfere with perceptions of neutrality and impartiality. Furthermore, the lack of systematic and strategic engagement with non-state armed groups in many contexts not only undermines WFP's perceived neutrality, but can also limit its access to areas controlled by such groups.
43. Decision-making processes in WFP are highly decentralized, and this flexibility has enabled access. It also limits coherence between different country offices and sub-offices, however, especially when operational responsibilities for access and humanitarian principles are not clearly defined at the country level.
44. Against this background, the evaluation team found staff competence to be a crucial factor. It also found significant shortcomings in corporate efforts in the context of deployments, induction, training and staff selection to ensure consistently high levels of staff competence on humanitarian principles and access.

Conclusions

45. The evaluation team concludes that humanitarian principles and access are more relevant today than ever before and need increased institutional attention and support. The policy documents are largely coherent, but have not been adequately disseminated or implemented in concert with other cross-cutting policy areas.
46. WFP's strong access for delivery through partners and its related strong performance on humanity comes at the expense of some compromises on the principles of impartiality, neutrality and operational independence in some settings. Greater attention to a principled approach, as well as to promoting principled access for needs assessment and monitoring, are essential.
47. Since a broad range of internal factors affect humanitarian principles and access, the evaluation team concludes that a cross-functional effort is required for successful policy implementation.

Recommendations

48. The following eight recommendations derive from the evaluation findings and conclusions and are informed by an evaluation workshop in January 2018 that was attended by WFP staff in a number of WFP functional areas.

Recommendation	Timing and responsible units
Recommendation 1: Policy dissemination	
<p>Strengthen the dissemination and operationalization of the policies on access and humanitarian principles:</p> <ul style="list-style-type: none"> • develop and compile short versions of the policies and ensure their integration in core institutional guidance; • share guidance and training materials more widely and adapt them to specific contexts where necessary; • increase the accountability of country directors for policy implementation; • strengthen communications on the humanitarian principles with host governments, <i>de facto</i> authorities and communities; and • clarify outstanding policy issues in new guidance and training. 	<p>2019 Policy and Programme Division</p>
Recommendation 2: Prioritization of principles	
<p>Put in place measures to increase the priority given to neutrality, impartiality and operational independence relative to access and humanity:</p> <ul style="list-style-type: none"> • ensure that humanitarian principles are taken into account in the development of other policies and strategies; • identify triggers for corporate decisions on complex trade-offs; and • increase the coherence of efforts relating to cross-cutting issues such as gender, protection and accountability to affected populations. 	<p>2018 Policy and Programme Division</p>
Recommendation 3: Staff capacity	
<p>Considerably strengthen staff competencies on humanitarian principles and access, particularly in complex emergency situations:</p> <ul style="list-style-type: none"> • provide standard, mandatory induction, including on access and humanitarian principles, to all WFP personnel; • develop tailored training modules on humanitarian principles and access for existing trainings, including compulsory online courses; • strengthen mentoring, continue supporting the Centre of Competence on Humanitarian Negotiation and enable the deployment of experienced national staff; • assign operational responsibility for issues relating to humanitarian principles and access to a field management position reporting to the country director; • facilitate peer exchanges; • include humanitarian principles and access in the terms of reference of all regional humanitarian advisers; • ensure adequate field capacity for analysing and documenting principled access issues in L3 and L2 emergency responses; and • ensure compliance with programme criticality processes. 	<p>2019 Human Resources Division</p>

Recommendation	Timing and responsible units
Recommendation 4: Partnership – cooperating partners	
<p>Give more priority to humanitarian principles in all elements of engagement with cooperating partners:</p> <ul style="list-style-type: none"> • exchange with donors on good practices; • integrate humanitarian principles into standardized partner selection and due diligence, field-level agreements, assessment and training; • strengthen WFP’s monitoring capacity; • better define the standards for accountability to affected populations expected of partners; and • improve joint planning and communication with partners, including on risks. 	<p>2019 Operations Services Department</p>
Recommendation 5: Partnership – commercial partners	
<p>Increase policy awareness, guidance and training opportunities for commercial partners:</p> <ul style="list-style-type: none"> • provide guidance and training on how to handle sensitive situations; • require reports on humanitarian principles and accept costs linked to compliance with humanitarian principles where necessary; and • where there are risks to compliance with humanitarian principles, rely more strongly on WFP transport assets and staff. 	<p>2019 Supply Chain Division</p>

Recommendation	Timing and responsible units
Recommendation 6: Needs assessment	
<p>Continue investing in and further strengthen needs assessment and the use of needs assessment data:</p> <ul style="list-style-type: none"> • continue investing in vulnerability analysis and mapping; • develop a coherent corporate position on how to react when host governments seek to significantly challenge or influence needs assessment data; • work more actively with the Food Security Cluster to track and document sector coverage of needs; and • use partner data more actively for triangulation. 	<p>2019 Operations Services Department</p>
Recommendation 7: Security	

Recommendation	Timing and responsible units
<p>Strengthen WFP's security capacity in complex emergencies and improve security officers' focus on humanitarian principles and access:</p> <ul style="list-style-type: none"> • continue to prioritize filling security positions in complex emergencies, including by providing sufficient resources, and improve contractual conditions to strengthen retention of security staff; • adapt terms of reference for field security officers; and • engage WFP's security capacity on operations and programme design. 	<p>2019 Field Security Division</p>
Recommendation 8 a): Donor relations and funding	
<p>Increase and regularize the dialogue with donors on humanitarian principles and access and strengthen principled financing:</p> <ul style="list-style-type: none"> • improve the overview of global and country-level coverage of needs for advocacy with donors; • hold regular high-level dialogue with donors on their support for principled response; • establish criteria for rejecting funding when conditions conflict with humanitarian principles; • use flexible funding strategically in high-risk settings where coverage is low; and • strengthen non-government funding sources. 	<p>2019–2020 Government Partnerships Division</p>
Recommendation 8 b): Donor relations and funding	
<p>Advocate for stronger support for all the facets of WFP operations that are critical for principled access, including:</p> <ul style="list-style-type: none"> • application of the Good Humanitarian Donorship commitments and funding according to need; • more unconditional funding; and • engagement with WFP on programme criticality, acceptable risk and resources needed to mitigate risks. 	<p>2019–2020 Government Partnerships Division</p>

1. Introduction

1. This chapter describes the features of this evaluation of the World Food Programme (WFP) policies on humanitarian principles and access in humanitarian contexts, introduces the policies that are the subject of the evaluation, and discusses the context in which the policies are currently applied.

1.1. Evaluation Features

2. **Rationale and objectives:** This evaluation assesses WFP policies on humanitarian principles and access in humanitarian contexts. The [document on humanitarian principles](#) was submitted to the Executive Board in 2004 and states WFP commitment to the core humanitarian principles of humanity, impartiality, and neutrality. Operational independence was added later, when the principles were re-stated in the WFP Strategic Plan 2014–2017. The [Note on Humanitarian Access](#) was presented to the Executive Board in 2006. It describes the role of WFP in access negotiations and identifies areas that are considered crucial for access. Both issues continue to be central to WFP operations and therefore fall under the provision of the WFP [Evaluation Policy, which is](#) to evaluate policies adopted before 2011 if they continue to be relevant. The 2016 World Humanitarian Summit reaffirmed that the core humanitarian principles of humanity, impartiality, neutrality, and independence are central if humanitarian organizations are to be accepted by affected people and parties to a conflict and, in the longer term, to have access to those in need of assistance. Access is a precondition for fulfilling the humanitarian mandate to assist people in need and has been challenged in many crucial operational contexts. Despite their importance, humanitarian principles and access have been poorly reflected in the evaluation practice of United Nations to date.⁹ This evaluation therefore aims to fill this gap and to contribute to accountability and learning by providing an evidence-based assessment of the policies' quality, the progress of WFP on humanitarian principles and access, and factors affecting results.

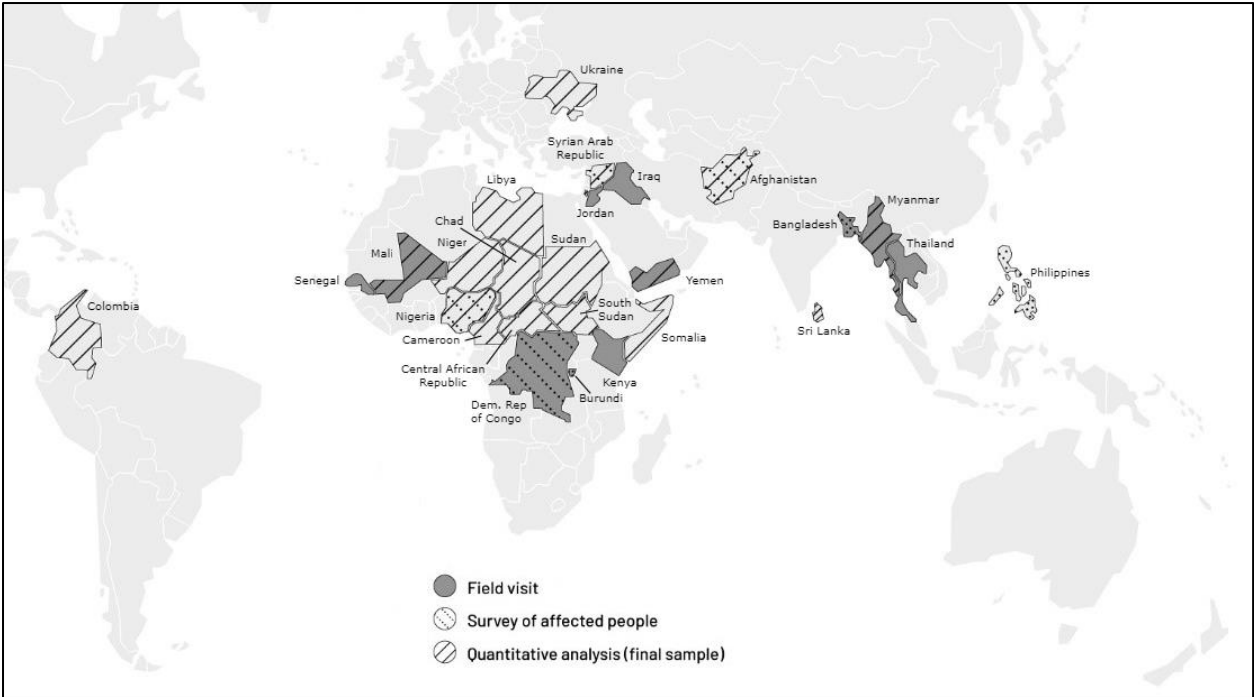
3. **Evaluation questions:** The evaluation addresses the following questions: (1) What is the quality of the policies and associated guidance? (2) Where does WFP stand regarding humanitarian principles and access? (3) What are the most important enablers and constraints?

4. **Users:** The primary audience for this evaluation is WFP senior management and Executive Board. Findings and recommendations are relevant for staff members negotiating access and making decisions that affect humanitarian principles at all levels, as well as for relevant functional areas, including policy and programme, logistics, security, emergency preparedness and support, supply chain, non-governmental organization (NGO) and government partnerships, gender, budget and programming, performance management and monitoring, and the implementation of the Integrated Road Map. External users will include other members of the Centre of Competence on Humanitarian Negotiation, cooperating partners, and the academic and research communities.

5. **Methods:** The evaluation was conducted by a four-person team from March to December 2017 and used a mixed-methods approach to gather a broad range of qualitative and quantitative evidence. The evaluation utilized various data collection and analysis tools to enable a large and diverse number of operational contexts to be analysed (Figure 8), to capture the perspectives of various stakeholders, and to triangulate different types and sources of data.

Figure 8: Geographic scope of field visits, affected population surveys and quantitative analysis

⁹ United Nations Evaluation Group. *Reflecting Humanitarian Principles in Evaluation*. Working Paper. New York, NY: United Nations Evaluation Group, 2016.



6. The evaluation involved seven main components, as detailed in Table 1, and further elaborated in the Annex (I, III, and VIII–XI).

Table 1: Overview of methods and evaluation activities

Method	Activities / details
Document analysis	Internal documents: policies, guidance, training materials, evaluations, project reports, and audits External documents: policies and guidance of comparator organizations, academic literature, and grey literature
Field visits for interviews and direct observation	Headquarters and regional hubs: Amman, Dakar, Nairobi, Bangkok, and Rome (3–5 days each) Field operations: the Democratic Republic of the Congo (DRC), Mali, Yemen, Burundi, Bangladesh, and Iraq (5–10 days each)
Stakeholder interviews, coded for selected questions	442 interviews in total: 152 women, 290 men 233 WFP staff, 55 other United Nations agencies, 51 international NGOs, 45 local NGOs, 7 Red Cross/Red Crescent staff, 29 donor representatives, 16 authorities, and 6 commercial service providers
Staff, partner, and external stakeholder surveys	Conducted in 65 countries with emergency operations 1,106 WFP respondents (339 women, 764 men, 3 non-binary); 87 cooperating partner respondents (19 women, 68 men); 132 other external stakeholders (49 women, 83 men)
Network analysis	206 respondents for network analysis
Public perceptions: • Affected population surveys • Feedback and complaints data • Social media analysis • Media analysis	Telephone surveys with affected populations in Afghanistan, Bangladesh, Burundi, DRC, Nigeria, and the Philippines (with partial results from Syria) 2547 respondents in total (1,103 women, 1,444 men) Analysis of data from complaints feedback systems in Bangladesh, Mali, the Philippines, and Somalia Social media analysis covers 63,796 tweets from 16,569 accounts 8 CARMA ¹⁰ reports, covering 2014–2016 GDELT ¹¹ search with 120,000 results and 24 directly relevant articles
Quantitative access and coverage analysis	Data from over 300 provinces/districts in 20 countries provided by WFP country offices Multi-level regression analysis of factors affecting coverage (e.g. security, logistics constraints, visa and import restriction, level of funding, availability of cooperating partners, control over territory, presence of groups listed as “terrorist” ¹² , L3 emergency status, presence of integrated United Nations peacekeeping mission, staff presence) Descriptive mapping of needs and WFP coverage

7. **Ethics and confidentiality:** Information about access negotiations and decisions based on the humanitarian principles can be highly sensitive.¹³ In addition to the usual confidentiality arrangements for evaluations, to mitigate risks for all participants and to enable the evaluation to gain access to relevant information, this evaluation adopted the following measures: no country case studies were developed from the field trips, and no country-specific information – only decontextualized analysis – was drawn from the interviews; and all surveys were conducted anonymously. To ensure data protection, the evaluation team kept written, digital records of interviews. These notes were stored securely in encrypted files, names of interviewees were stored separately from content, and only the three members of the evaluation team who conducted interviews (Julia Steets, Adele Harmer, and Claudia Meier) had access to these notes.

8. **Consideration of gender:** The evaluation considered gender in various ways. It assessed what synergies and tensions exist between the WFP Gender Policy and the policies on access and humanitarian principles. The team adopted measures to ensure that as far as possible, men and

¹⁰ CARMA is a global provider of media intelligence solutions.

¹¹ Global Database of Events, Language, and Tone (GDELT) <https://www.gdeltproject.org/>

¹² For analytical purposes, this evaluation used the US Department of State Foreign Terrorist list as a reference, while noting that as a United Nations agency, WFP does not abide by national terrorist lists.

¹³ Steets, Julia. *Scoping Report and Evaluability Assessment for the Evaluation of WFP's Policies on Humanitarian Principles and Access in Humanitarian Contexts*. Berlin: GPPI, 2016.

women participated in equal proportion in surveys, interviews, and workshops. Since remote telephone surveys with affected populations typically receive a significantly lower number of responses from women, targets for the overall number of men and women respondents were set. This resulted in an overall share of 43 percent women respondents. All data-gathering instruments recorded the respondents' sex, enabling the team to identify differences between different groups of respondents.

9. **Scope:** The scope of the evaluation was global, covering all emergency operations and focusing on challenging situations with regard to access and humanitarian principles. This evaluation covers the period since the adoption of the policies (2004 and 2006, respectively), with a focus on the period 2012-2017. Due to staff turnover, data and information were more readily available for the past three to five years. To support organizational learning, a confidential, internal learning component will follow this evaluation. The design and implementation of the evaluation was coordinated with the WFP protection policy¹⁴ evaluation in terms of the thematic focus of both each evaluations, as well as the implementation of field visits.

10. **Geographic coverage:** To cover both breadth and depth, the data collection and analysis tools covered different numbers of countries. In interviews, the evaluation team considered both current and previous operational deployments of the interviewees, hence collecting insights from across the spectrum of WFP operational experiences and over different time periods. The staff and partner surveys focused on WFP emergency operations in 65 countries. The quantitative analysis focused in further, by concentrating on 18 WFP emergency operations that are experiencing challenges on access and humanitarian principles.¹⁵ Both the field visits and the telephone surveys with affected populations also drew on this pool, each focusing in detail on six operations.¹⁶

11. **Stakeholders:** Through the variety of methods used, the evaluation involved a broad range of stakeholders, including WFP staff, cooperating partners and other NGOs, host government representatives, United Nations agencies, Red Cross/Red Crescent movement representatives, commercial providers, and donor governments. A full breakdown of the stakeholder group is available in Annex I (Methods).

12. **Testing:** All data collection tools were tested before they were fully applied. During an initial joint mission of the team to Amman, the interview protocols were tested and subsequently adapted. The staff and partner surveys were tested with field colleagues during an early field mission. The affected population survey was tested in Nigeria before being fully rolled out there and in other countries. The data request to WFP country offices was also discussed with field colleagues before disseminating it more broadly, and the tools for systematically analysing documentary evidence and for coding interview data were reviewed internally before roll-out.

13. **Sequencing:** Data gathering was sequenced to allow for the early findings of some components to influence the design and implementation of others. Results of the first field missions (in Amman, Dakar, and the Democratic Republic of the Congo) informed the design of the surveys and also the implementation of subsequent field visits. Preliminary results from all components, including first reflections on potential conclusions and recommendations, informed interviews conducted at headquarters at the end of the data collection period in December 2017.

¹⁴ WFP's Policy on Humanitarian Protection: A Policy Evaluation (2018): <https://www.wfp.org/content/wfp-policy-humanitarian-protection-policy-evaluation-terms-reference>.

¹⁵ The evaluation had initially identified 23 operations as experiencing challenges on access and humanitarian principles in interviews during the scoping and inception phases. However, due to limited data availability, the final sample was reduced to 18. For the full overview of the countries covered in the quantitative analysis, refer to Annex I Table 1 (page 4).

¹⁶ See Table 1 above for the list of countries covered through field visits and phone surveys.

14. **Analysis and weighting of evidence:** In order to analyse, triangulate, and synthesize the wide range of data collected, the team produced separate analytical pieces on each of the components, which were then exchanged and reviewed by other members of the evaluation team. A pre-drafting discussion was also conducted to consider the key findings from the components. The various data sources were triangulated against each other, weighed in relation to their quality, and a consensus on indicative conclusions was developed. Findings were organized and analysed following the main evaluation questions.

15. **Limitations:** Most potential risks of and limitations on the evaluation, such as reluctance to share information on sensitive issues and limited availability of key staff during reassignments, were identified during the inception phase and successfully mitigated. Despite the limitations listed below, the evaluation team was able to construct valid findings and conclusions. The following limitations remain:

- Due to unforeseen developments and access challenges, several field missions had to be postponed (for example, in Bangladesh and Iraq), shortened (in Yemen), or could not take place (in Myanmar and Somalia). For Myanmar, remote interviews were undertaken.
- As anticipated, there were concerns regarding the implementation of direct interviews with affected populations, including physical access constraints for the evaluation team, protection concerns for individuals participating in discussion of potentially sensitive topics, and limitations in reaching a representative number of individuals through interviews within the given time and resource constraints. While the evaluation team explored possibilities for several contexts, systematic interviews were not conducted. Instead, phone-based surveys were implemented in six of the WFP emergency operations.
- The quantitative analysis was based on a snapshot analysis covering the third quarter of 2016 and used various indicators that were based on the observations of WFP field staff. This approach was chosen to increase comparability and to enhance the likelihood of receiving complete datasets, but it did not fully account for influencing factors, such as seasonal variations in coverage and access constraints (see Volume II in Annex).
- The analysis focused mainly on the policies of the following identified comparator organizations: the Office of the United Nations High Commissioner for Refugees (UNHCR), the United Nations Children's Fund (UNICEF), the Norwegian Refugee Council (NRC), and the International Committee of the Red Cross (ICRC). A full comparison of policy implementation measures was not possible because some of the comparators have also just started to document their approach in more detail. In addition to the policy comparison, the team identified specific good practice examples linked to the evaluation recommendations.
- At the request of the WFP Office of Evaluation, confidentiality arrangements for the interviews were amended following the first two field visits, no longer allowing participants to remain entirely anonymous to conform with the Office of Evaluation's transparency standards. Interview data from 12 interviews with individuals who had requested anonymity were therefore not included, and it is possible that some external stakeholders were unwilling to share the full range of information.

16. **Evaluation team and quality assurance:** The evaluation was carried out by an independent, five-person team from the Global Public Policy Institute and Humanitarian Outcomes. It received additional input from five researchers from the two institutions. To ensure the quality of results, the evaluation team applied the WFP evaluation quality assurance system. The evaluation report was peer reviewed by Urban Reichhold, and the evaluation team integrated comments from: the WFP Office of Evaluation, a senior management briefing and stakeholder workshop held in Rome on 29-30 January 2018, the internal and external reference groups, and WFP management.

1.2. Context

17. Several external and internal trends and developments are shaping the context in which WFP is working to translate its policies on humanitarian principles and access into practice. These trends and developments are set out more fully in paragraphs 18 to 26.

18. There are more protracted emergencies and stronger links between development and security. Initially, humanitarian action was intended to provide short-term relief for extreme situations. Today, many humanitarian operations happen in complex, conflict-related protracted crises. From 1990 to 2012, funding for crises lasting eight years or longer increased by a factor of six but remained constant for emergencies lasting three years or less.¹⁷ The ICRC, for example, has been present for an average of 36 years in its ten largest operations and spends two thirds of its funding on protracted conflicts.¹⁸ Long-term crises call for longer-term programming. WFP has responded to the protracted nature of emergencies since 2008 by gradually [shifting](#) its approach from food aid (delivery of in-kind food) to food assistance (combining food, cash, and nutrition instruments to address food insecurity). Since 2016, WFP has aligned its strategic planning with the [Sustainable Development Goals](#). The protracted nature of crises has also given the debate on linking humanitarian and development work a new impetus - for example, through the [New Way of Working](#) initiative - and is reflected in the approaches to some cross-cutting issues such as gender. The integration of different agendas raises important questions for the application of humanitarian principles. Particularly problematic are proposals to integrate aid with peace and security activities,¹⁹ which could pressurize humanitarian organizations into focusing on areas that are strategically important or “liberated” from groups designated as “terrorist” rather than prioritizing depending on need.

19. Armed conflict is more fragmented and there is a rising interest in access negotiations. Humanitarian organizations need security guarantees from armed actors to be able to deliver assistance in conflict areas. In many conflicts, armed groups have been fragmenting.²⁰ This means that command structures are more complex and less reliable, and security guarantees are harder to come by.²¹ Meaningful engagement is even more difficult where armed groups pursue criminal or extremist agendas, as they have less interest than other armed groups in reaching agreement with humanitarians to provide welfare to the communities they control.²² At the same time, humanitarian organizations are hesitant to engage with non-state armed groups.^{23,24} Yet it is through engagement that armed groups understand rules on access and begin to see humanitarians as more neutral and less partisan.²⁵ Recognizing these connections, humanitarian organizations have become more interested in access negotiations. The World Humanitarian Summit was criticized for not giving enough attention to access and humanitarian principles. Subsequently, a growing body of access guidance,²⁶ as well as the creation of a [Centre of](#)

¹⁷ Bennett, Christina. *The Development Agency of the Future: Fit for Protracted Crises?* London: Overseas Development Institute, 2016, p. 6.

¹⁸ International Committee of the Red Cross. *Protracted Conflict and Humanitarian Action: Some Recent ICRC Experiences*. Geneva: International Committee of the Red Cross, 2016.

¹⁹ World Bank Group. “The Humanitarian-Development-Peace Initiative.” The World Bank, 2017.

²⁰ [Bakke, Kristin M., Kathleen Gallagher Cunningham, and Lee J. M. Seymour. “The problem with fragmented insurgencies.” *The Washington Post*, May 13, 2015. Accessed January 9, 2018.](#)

²¹ [Maurer, Peter. “New Security Challenges and the ICRC.” *Speech, Geneva, Switzerland, October 5, 2014.*](#)

²² Stoddard, Abby, Adele Hammer, and Monica Czarwno. *Behind the Attacks: A Look at the Perpetrators of Violence Against Aid Workers*. London: Humanitarian Outcomes, 2017.

²³ ‘Non-state armed groups’ is used interchangeably with ‘armed groups’ throughout the report.

²⁴ Carter, William, and Katherine Haver. *Humanitarian Access Negotiation with Non-State Armed Groups*. London: Humanitarian Outcomes, 2016, p. 18.

²⁵ [Jackson, Ashley. *In Their Words: Perceptions of Armed Non-State Actors on Humanitarian Action*. Geneva: Appel de Genève, 2016.](#)

²⁶ For an overview of guidance on negotiations and access, see Carter and Haver, *Humanitarian Access Negotiations with Non-State Armed Groups*.

[Competence on Humanitarian Negotiation](#), illustrate the increased interest in this topic. This has led to a more systematic effort to map access constraints,²⁷ but it has not yet resulted in a more solid understanding of presence and coverage patterns.²⁸

20. There are increasingly complex counter-terrorism laws. Attempts to politicize and undermine the independence of aid are as old as humanitarian action itself.²⁹ Complex counter-terrorism legislation adopted after the attacks on the United States on 11 September 2001 has added a new dimension to this. Access negotiations require discussions with armed actors. Counter-terrorism laws prohibit the provision of direct or indirect material support to groups designated as terrorist. The “indirect support” clause is particularly controversial, as this can be interpreted very broadly to include, for example, humanitarian assistance that terrorists extort from the communities that receive it.³⁰ In 2016, 13 conflicts involved groups listed as terrorist.³¹ In some cases, United Nations Security Council resolutions include exemptions for humanitarian action, but these tend to be complicated and time bound.³² The ensuing legal insecurity has led some organizations to stop working in areas where groups on the terrorist list are active, and others have adapted the forms of assistance they provide. Counter-terrorism legislation has also led some donors to request detailed information about partner organizations and their staff, limiting the operational independence of aid organizations.³³ Moreover, there is anecdotal evidence that certain donors have started to vet beneficiary lists, excluding the families of fighters designated as “terrorists”³⁴ – a fundamental departure from international humanitarian law and the principles of humanity and impartiality.

21. There have been attempts to improve security management through programme criticality. Attacks on aid workers strongly affect the presence of humanitarian organizations in the field.³⁵ Since 2013, the number of security incidents has remained steady in most contexts, but it has increased in Afghanistan, Somalia, South Sudan, Syria, and Yemen,³⁶ and attacks on humanitarian facilities have been rising.³⁷ The majority of these attacks are politically motivated.³⁸ To be able to “[stay and deliver](#)” under these circumstances, United Nations agencies have tried to improve their security management. Since 2011, this includes [programme criticality](#) assessments to help collectively determine priority (life-saving) interventions, as well as mitigation measures and the residual risk that organizations are willing to accept. Recent research has found, however,

²⁷ See, for example, [Office for the Coordination of Humanitarian Affairs. “South Sudan: Humanitarian Access Snapshot.” Reliefweb, November 10, 2017. Accessed January 9, 2018.](#)

²⁸ For an example focusing on Afghanistan, Syria, Somalia, and South Sudan, see [Secure Access in Volatile Environments. “Presence and Coverage: The Effects of Insecurity on Humanitarian Coverage.” SAVE, January 9, 2018.](#)

²⁹ Donini, Antonio, ed. *The Golden Fleece: Manipulation and Independence in Humanitarian Action*. West Hartford, CT: Kumarian Press, 2012; [Thompson, Andrew. “Humanitarian Principles Put to the Test: Challenges to Humanitarian Action During Decolonization.” *International Review of the Red Cross* 97, no 897/898, 2016, p. 45–76.](#)

³⁰ International Committee of the Red Cross. *Proceedings of the Bruges Colloquium: Terrorism, Counter-Terrorism, and International Humanitarian Law*. Bruges: Council of Europe, 2016.

³¹ [Davis, Ian. “Armed Conflict and Peace Processes.” Stockholm International Peace Research Institute, 2017. Accessed January 10, 2018.](#)

³² For example, United Nations Security Council. Resolution 1972. 2011.

³³ [International Council of Voluntary Agencies. “Joint Statement on the Humanitarian Principles.” ICVA Network, 2015. Accessed January 10, 2018.](#)

³⁴ [Inter-Agency Standing Committee Humanitarian Financing Task Team. *Donor Conditions and Their Implications for Humanitarian Response*. Geneva: Inter Agency Standing Committee, 2016.](#)

³⁵ Stoddard, Abby, and Shoab Jilani. *The Effects of Insecurity on Humanitarian Coverage*. London: Humanitarian Outcomes, 2016, p.8.

³⁶ Aid Worker Security. “Aid Worker Security Report Figures at a Glance 2016.” *Reliefweb*, August 15, 2016. Accessed January 11, 2018.

³⁷ [World Health Organization. “Attacks on Health Care Dashboard.” WHO, 2016.](#)

³⁸ Cf. Jackson, Ashley. *In Their Words: Perceptions of Armed Non-State Actors on Humanitarian Action*. 2016, which analyzes 19 non-state armed actors across 11 countries, and Jackson, Ashley. *Talking to the Other Side*. 2012. See also [Stoddard, Abby, Adele Hammer, and Monica Czwarno. *Behind the Attacks: A Look at the Perpetrators of Violence Against Aid Workers. Aid Worker Security Report 2017*. London: Humanitarian Outcomes, 2017.](#)

that not enough progress has been achieved in this area.³⁹ Some observers also fear that changes to the United Nations security structure might reverse the progress already made. Security officers from the Department of Peacekeeping Operations and Political Affairs have been integrated into the United Nations Department of Safety and Security (UNDSS). This could strengthen the Department of Safety and Security's influence in the Inter-Agency Security Management Network. The perspectives and affiliations of these officers could also lead to security management decisions that undermine the access and principles of United Nations humanitarian agencies in the field.

22. There are more sophisticated bureaucratic restrictions. Some host governments are also limiting the independence of humanitarian operations. Those trying to direct humanitarian action in their countries are relying on a growing set of tools, including visa authorizations, high visa fees,⁴⁰ internal travel authorizations, registration procedures, and requirements for the approval of individual shipments and cooperating partners,⁴¹ as well as security clearances.

23. There is less direct contact with affected populations and a more prominent role for national NGOs. With increased risks and risk aversion, humanitarian organizations – and United Nations agencies in particular – often have less direct contact with affected people. This has made it more difficult to adhere to the principle of humanity, since proximity between those providing and those receiving aid helps mutual understanding and thus helps respect dignity.⁴² To address this problem, the humanitarian sector is promoting more participation with, and accountability to, affected people. So far, these efforts have shown little effect.⁴³ Many organizations hope that the increasingly diverse range of mechanisms to engage affected people, including access to mobile phones, will allow them to communicate more directly with those in need, even though in many contexts women and older people tend to have less access to mobile phones and other forms of communication based on technology. At the same time, there is a push to give those who interact closely with affected people – namely national and local organizations – a more prominent role in the humanitarian system and to provide them with more direct funding.⁴⁴ This adds another layer of complexity to maintaining a principled approach: while large international humanitarian organizations have invested some time in assessing what the principles entail for them as implementers, far less consideration has been given to what they mean when the agencies provide funding to partner organizations to implement programmes on their behalf. Many humanitarians also argue that local organizations suffer greater bias when working in their own settings and are more exposed to pressures, including from local authorities and armed groups.

24. There has been a shift to cash based transfers. Building on successful pilot initiatives, the humanitarian system – and the food assistance sector in particular – has increasingly been providing cash based transfers. As part of the Grand Bargain, signatories have committed to significantly increasing cash based programmes, and WFP has emerged as one of the leading humanitarian organizations implementing this approach. In 2017, 30 percent of WFP assistance was provided in cash or vouchers. The shift to cash based programmes has important implications for the humanitarian principles. First and foremost, research has recognized it as an approach that

³⁹ [OCHA \(2017\)](#); Stoddard and Jillani, *The Effects of Insecurity on Humanitarian Coverage*, 2016, p. 24.

⁴⁰ [Aljazeera News. "Aid groups criticise South Sudan for \\$10,000 visa fees." *Aljazeera News*, March 11, 2017. Accessed January 10, 2018.](#) See also [Bennett, Nicki. "Humanitarian Access in South Sudan." *Humanitarian Practice Network*, May 2013](#), for a discussion of other bureaucratic impediments to access in South Sudan.

⁴¹ [Lynch, Colum. "Exclusive: Yes, Syria's Humanitarian Crisis Can Get Worse. Much Worse." *Foreign Policy*, June 26, 2014. Accessed January 10, 2018.](#)

⁴² Fast, Larissa. "Unpacking the Principle of Humanity: Tensions and Implications."

⁴³ [Ruppert, Lotte, Elias Sagmeister, and Julia Steets. *Listening to Communities in Insecure Environments*. SAVE Research Programme, 2016.](#)

⁴⁴ Cf. Global Humanitarian Assistance Report; [Howe, Kimberly, Elizabeth Stites, and Danya Chudacoff. *Breaking the Hourglass: Partnerships in Remote Management Settings — The Cases of Syria and Iraqi Kurdistan*. Somerville, MA: Feinstein International Center, 2015.](#)

can allow greater choice and agency for affected people.⁴⁵ This enhances their dignity and thereby strengthens the principle of humanity. At the same time, however, donors that are supporting cash based transfers have started to prescribe which modality agencies should be using (see paragraph 106), thereby reducing the agencies' operational independence. Links to access have not been fully explored. On the one hand, electronic cash transfers require less regular physical access for aid workers and could allow for continued assistance where access conditions deteriorate. On the other hand, they can only be used where the necessary (phone-) banking infrastructure and markets exist, and aid workers need to be able to access affected people in order to assess needs, register beneficiaries, and monitor the use of cash based transfers. Cash also affects the access of affected people to assistance, but the evaluation does not explore this in depth since it uses the WFP definition of access, which focuses on the access of humanitarian organizations to people in need.

25. Another dynamic affecting the politicization of aid is the increased levels of migration to Europe related to crises in the Middle East and migration dynamics in Africa. First, humanitarian funding is concentrating on fewer, more politically important emergencies. In 2016, the five emergencies attracting the most global funding accounted for 54 percent of all donor spending – a marked increase from 33 percent in 2012.⁴⁶ This concentration affects impartiality at a global level, as some responses are better funded than others relative to need. Second, many European donors are under populist pressure to show that humanitarian funding helps curb migration to Europe. This potentially risks undermining the independence of humanitarian action.⁴⁷ The United Kingdom's recent humanitarian reform policy, for example, suggests that humanitarian action should contribute to keeping affected people within their regions.⁴⁸ Similarly, the Directorate-General for European Civil Protection and Humanitarian Aid Operations (ECHO) spent half of its 2016 budget on Syrian refugees in Turkey and humanitarian aid within Europe.⁴⁹

26. Finally, with regard to the context in which WFP is working to translate its policies into practice, there is a slowly increasing acknowledgement that principles entail trade-offs. Most humanitarian organizations consider the humanitarian principles as crucial norms guiding humanitarian action.⁵⁰ As a result, many organizations treat them as sacrosanct and shy away from open debate on what applying these principles means in practice, especially if this might involve compromises and trade-offs. This makes it difficult to systematically consider what compromises are acceptable and at what point "compromise morph[s] into complicity."⁵¹ More recently, there has been more analysis of and debate about inevitable compromises and trade-offs,⁵² which can make it easier for WFP to acknowledge and openly discuss these issues. Table 2

⁴⁵ [Bailey, Sarah and Paul Harvey. *State of Evidence on Humanitarian Cash Transfers*. Background Note for the High-Level Panel on Humanitarian Cash Transfers, 2015.](#)

⁴⁶ [Development Initiatives. *Global Humanitarian Assistance Report 2017*. Report. Bristol: Development Initiatives, 2017](#), p. 56.

⁴⁷ [DuBois, Marc. *On the Right Track? Reasserting the Priorities of Humanitarian Action*. Report. Geneva: HERE-Geneva, 2016.](#)

⁴⁸ [Bryant, John. "The UK and Humanitarian Reform: In Whose Interest?" Overseas Development Institute, October 20, 2017.](#) See also: [Drummond, Jim, Victoria Metcalfe-Hough, Barnaby Willitts-King, and John Bryant. *Beyond Donorship: UK Foreign Policy and Humanitarian Action*. London: Overseas Development Institute, 2017.](#)

⁴⁹ [Parker, Ben. "ECHO Budget Almost Doubles – But Migration Strings Attached." *IRIN*, 13 September 2016. Accessed January 10, 2018.](#)

⁵⁰ Including the Red Cross and Red Crescent Movement and at least 621 international NGOs, who have signed the [Code of Conduct](#) for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief, as well as the United Nations and its specialized agencies (United Nations General Assembly resolution 46/182 and 58/114).

⁵¹ Thompson, Andrew. "Humanitarian Principles Put to the Test: Challenges to Humanitarian Action During Decolonization." *International Review of the Red Cross* 97, no 897/898, 2016, p. 54. Cf. [DuBois, Marc. *On the Right Track? Reasserting the Priorities of Humanitarian Action*. Geneva: HERE-Geneva, 2016](#); Haver, Katherine, and William Carter. *What It Takes: Principled Pragmatism to Enable Access and Quality Humanitarian Aid in Insecure Environments*. London: Humanitarian Outcomes, 2016.

⁵² See, for example, Haver, Katherine. "Tug of War: Ethical Decision-Making to Enable Humanitarian Access in High-Risk Environments." *HPN Network Paper* 80, 2016; Labbé and Daudin, *Applying the Humanitarian Principles*; Abu-Sada, Caroline, ed. *In the Eyes of Others: How People in Crisis Perceive Humanitarian Aid*. New York: MSF USA, 2012; Dyukova, Yulia, and

offers an overview of the types of trade-offs and compromises discussed in the emerging literature.

Table 2: Potential trade-offs relating to the humanitarian principles⁵³

Humanity versus impartiality: In many emergencies, humanitarian agencies are denied access to certain areas. This creates a trade-off between the principles of humanity and impartiality. Agencies need to decide whether they deliver assistance only where they have access, violating impartiality, or whether they refuse to deliver at all as long as impartial access is not granted, compromising humanity.

Humanity versus independence: Most humanitarian organizations depend on contributions from donor governments to be able to deliver assistance. Some donors link their contributions to specific demands, which may be tied to security or other non-humanitarian objectives.⁵⁴ In deciding whether or not to accept these conditional donor funds, organizations thus face a trade-off between humanity and independence.

Humanity versus impartiality and (perceived) neutrality: Some host governments or armed groups controlling a territory may only allow aid organizations access to people in need if they adjust their targeting criteria or include or exclude certain groups from the list of beneficiaries. This represents a trade-off between humanity and impartiality and also affects perceived neutrality. Other conditions imposed – for example, requests for taxes or payments at checkpoints, or restrictions on direct interactions with aid recipients – can create tensions between humanity and other normative goals, in this case anti-corruption and accountability to affected people.⁵⁵

Humanity versus neutrality: An agency may use military escorts to enable operations in areas with high security risks. This entails compromises with the principle of neutrality. Not delivering in high-need and high-risk areas, however, would compromise the principles of humanity and impartiality.

Impartiality versus perceived neutrality: In some contexts, needs are more acute in areas controlled by one conflict party. Organizations prioritizing those with the most acute needs may therefore not be perceived as neutral. Also catering to the (lesser) needs of people on the other side, however, compromises impartiality.

Neutrality versus other normative goals: Neutrality also requires not engaging in controversies of a political, racial, religious, or ideological nature. Promoting other normative goals may therefore create tensions with the principle of neutrality. Speaking out against human rights abuses perpetrated by a specific party, for example, can be seen as compromising neutrality, as can promoting women's empowerment in societies where women's rights are subject to political or ideological disputes.⁵⁶

1.3. WFP Policies on Humanitarian Principles and Access in Humanitarian Contexts

27. Reflecting on two cornerstones of effective humanitarian action, WFP submitted a [statement of its humanitarian principles](#) to the Executive Board in 2004 and a [note on humanitarian access](#) in 2006. Access to people in need and the humanitarian principles of humanity, impartiality, neutrality, and independence are closely connected. International humanitarian law allows relief organizations access to conflict areas, on the condition that they do not interfere in military and political matters.⁵⁷ This evaluation therefore covers both policy documents.

28. The humanitarian principles derive from international humanitarian law and other normative documents, including the Geneva Conventions (1949), the Fundamental Principles of the Red Cross (1965), the Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief (1992), United Nations General Assembly Resolutions

Pauline Chetcuti. *Humanitarian Principles in Conflict: Ensuring Humanitarian Principles are Respected in Armed Conflicts and Other Situations of Violence: ACF's Experience and Position*. Paris: ACF International, 2013.

⁵³ For definitions of the individual humanitarian principles, please see section 1.3., page 11.

⁵⁴ See, for example, Nascimento, Daniela. "One Step Forward, Two Steps Back? Humanitarian Challenges and Dilemmas in Crisis Settings." *The Journal of Humanitarian Assistance*, 2015, for an analysis of the instrumentalization of humanitarian assistance.

⁵⁵ Cf. WFP. *Review of WFP Experience in Securing Humanitarian Access*. 2000.

⁵⁶ A report by the World Bank found that 155 of the 173 economies assessed have at least one law in place that impedes women's economic opportunities. This includes, for example, laws obliging women to obey their husbands, laws restricting what kinds of jobs women can do, and laws requiring the husband's permission for women applying for a passport. World Bank Group. *Women, Business, and the Law 2016: Getting to Equal*. Washington, D.C.: The World Bank, 2015.

⁵⁷ Cf. Schwendimann, Felix. "The Legal Framework of Humanitarian Access in Armed Conflict." *International Review of the Red Cross* 93, no. 884, 2011.

(1991 and 2003), the Sphere Standards (1999), and the Core Humanitarian Standard (2015). They build on the values of respecting the lives and dignity of other people, as present, for example, in the concepts of zakat in Islam, almsgiving in Christianity, and dana in Hinduism.⁵⁸

Table 3: Definition of the core humanitarian principles

Humanity enshrines the fundamental value of “kindness toward others” that follows from a shared appreciation for human life.⁵⁹ It seeks “to prevent and alleviate human suffering wherever it may be found” in order “to protect life and health and to ensure respect for the human being”.⁶⁰ The focus on respect or dignity is important, as it “keeps recipients of humanitarian assistance from being reduced to their needs”.⁶¹ Humanity is the least contested of the four principles, but some contend that the principle fails to address the “inequalities and hierarchies” inherent in the relationship between the giver and the receiver of aid.⁶² The WFP definition of humanity is: “WFP will seek to prevent and alleviate human suffering wherever it is found and respond with food assistance when appropriate. It will provide assistance in ways that respect life, health and dignity.”⁶³

Impartiality requires that aid organizations give “priority to the most urgent cases of distress” and make “no discrimination as to nationality, race, religious belief, class or political opinions”.⁶⁴ Coherent with the WFP gender policy, its definition of impartiality adds gender to this list: “WFP’s assistance will be guided solely by need and will not discriminate in terms of ethnic origin, nationality, political opinion, gender, race or religion. In a country, assistance will be targeted to those most at risk, following a sound assessment that considers the different needs and vulnerabilities of women, men and children.” Prioritizing the most urgent needs requires organizations to have a good understanding of needs and the ability to target their aid accordingly. Impartiality also requires prioritizing different crises depending on the respective levels of need.⁶⁵

Neutrality serves to ensure that all parties have confidence in and accept humanitarian organizations. It requires that aid organizations do “not take sides in hostilities or engage at any time in controversies of a political, racial, religious or ideological nature”.⁶⁶ Neutrality is the most contested of the four principles. Dunantist⁶⁷ organizations believe that “one cannot be at the same time the champion of justice and of charity” and avoid any communication which could be interpreted as political.⁶⁸ Other organizations criticize neutrality as “complicity in underlying crimes” and combine humanitarian action with human rights advocacy.⁶⁹ As a result of these different interpretations, neutrality was not included in the 1994 Code of Conduct, the founding document for the sector-wide application of the humanitarian principles.⁷⁰ When organizations adopted the Core Humanitarian Standard in 2014, neutrality was only included after a long debate, with a footnote that it would not preclude organizations from advocating for rights.⁷¹ The WFP definition of neutrality is: “WFP will not take sides in a conflict and will not engage in controversies of a political, racial, religious or ideological nature. Food assistance will not be provided to active combatants.”

Independence refers to the “freedom to act in line with a purely humanitarian goal and methodology” without “political interference”.⁷² Independence requires organizations to be institutionally and politically independent from state

⁵⁸ Bernard, Vincent. “The Humanitarian Ethos in Action.” *International Review of the Red Cross* 97, no. 897/898, 2015, p. 8.

⁵⁹ Slim, Hugo. *Humanitarian Ethics, A Guide to the Morality of Aid in War and Disaster*. London: Hurst & Company, 2015, p. 45.

⁶⁰ Pictet, Jean. *The Fundamental Principles of the Red Cross: Commentary*. Geneva: Henry Dunant Institute, 1979.

⁶¹ Labbé, Jérémie, and Pascal Daudin. “Applying the Humanitarian Principles: Reflecting on the Experience of the International Committee of the Red Cross.” *International Review of the Red Cross* 97, no. 897/898, 2016, p. 186.

⁶² Fast, Larissa. “Unpacking the Principle of Humanity: Tensions and Implications.” *International Review of the Red Cross* 97, no. 897/898, 2016, p. 120–21.

⁶³ All definitions are taken from the WFP Strategic Plan 2014–2017

⁶⁴ Pictet, *The Fundamental Principles of the Red Cross: Commentary*.

⁶⁵ Cf., for example, Oxfam. *Oxfam’s Role in Humanitarian Action*. Oxford: Oxfam International, 2013, p. 2.

⁶⁶ Pictet, *The Fundamental Principles of the Red Cross: Commentary*.

⁶⁷ The term ‘Dunantist’ refers to humanitarian practitioners who follow the traditional approach to humanitarianism, comprising the four humanitarian principles humanity, neutrality, impartiality and independence.

⁶⁸ Minear, Larry. “The Theory and Practice of Neutrality: Some Thoughts on the Tensions.” *International Review of the Red Cross* 81, no. 833, 1999, p. 63–71.

⁶⁹ Gordon, Stuart, and Antonio Donini. “Romancing Principles and Human Rights: Are Humanitarian Principles Salvageable?” *International Review of the Red Cross* 97, no. 897/898, 2016, p. 91.

⁷⁰ See Labbé, Jérémie. “How Do Humanitarian Principles Support Humanitarian Effectiveness?” *CHS, On the Road to Istanbul, Accountability Report*. London: CHS Alliance, 2015. See also International Federation of the Red Cross and Red Crescent Societies, Norwegian Refugee Council. *Conference Report Equipped to Meet Tomorrow’s Humanitarian Challenges? 20th Anniversary of the Code of Conduct Geneva, 5th December 2014*. Geneva: Norwegian Refugee Council, 2015.

⁷¹ For detailed arguments for and against neutrality, see [De Riedmatten, Anne, and Nigel Timmins. “Contrasting Views – Including ‘Neutrality’ in the CHS.” Groupe URD, 2015.](#)

⁷² Slim, *Humanitarian Ethics*, p. 72

interests. Since United Nations agencies are governed by member states, some observers question whether they can be independent.⁷³ The United Nations General Assembly only adopted the principle of independence after debates in 2003, with resolution [58/114](#). Reflecting these debates, WFP subscribes to the principle of “operational independence” to stress that its operations, rather than its governance, are independent. It defines operational independence as: “WFP will provide assistance in a manner that is operationally independent of the political, economic, military or other objectives that any actor may hold with regard to areas where such assistance is being provided.” Another important aspect is financial independence. Most humanitarian organizations strongly depend on government funding, and donors often earmark their contributions for specific purposes or impose other conditions. Relying on diverse sources of funding and accepting contributions from donors who adhere to humanitarian principles themselves therefore increases independence.

29. In its [2004 Statement of Humanitarian Principles](#), WFP commits to the “core humanitarian principles” of humanity, impartiality, and neutrality. WFP later added operational independence in its [Strategic Plan \(2014-2017\)](#) and amended the wording of the other principles to reflect the shift from food aid to food assistance. The document also includes five “foundations of effective humanitarian action” (respect, self-reliance, participation, capacity-building, and coordination) and two “standards of accountability and professionalism” (accountability and professionalism), but this evaluation only focuses on the core humanitarian principles.

30. The document is a “statement” of, rather than a “policy” on, humanitarian principles. WFP submitted it to the Executive Board for information rather than for approval. The document also does not discuss what the application of the principles would entail in practice, nor does it propose any measures for implementing the policy. Those internal stakeholders who recollect the dynamics at the time see the statement on humanitarian principles as mainly codifying existing practice.

31. Humanitarian access is commonly defined as “both the ability of humanitarian organizations to reach populations affected by crisis and the ability of affected populations to access humanitarian services”.⁷⁴ International humanitarian law deals with issues related to access, but leaves room for interpretation. The Geneva Conventions make all relief actions subject to “the consent of the State concerned” but require states to facilitate “unimpeded passage” once consent is granted. In addition, states must not withhold consent arbitrarily. Denying access for food assistance providers, for example, can amount to the war crime of starvation.⁷⁵ However, the Geneva Conventions do not define what “arbitrary” means. Many humanitarian organizations are promoting a broad, rights-based view of access.⁷⁶ The United Nations Security Council has recently followed this interpretation. In 2014, it authorized United Nations humanitarian agencies and their partners to cross borders into Syria, even though the Syrian government had not consented to this.⁷⁷ Some scholars, however, characterize this as an “assumed ‘right of interference’”.⁷⁸ Another

⁷³ Schenkenberg van Mierop, Ed. “Coming Clean on Neutrality and Independence: The Need to Assess the Application of Humanitarian Principles.” *International Review of the Red Cross* 97, no. 897/898, 2016, p. 295–318, esp. 308–9.

⁷⁴ [Office for the Coordination of Humanitarian Affairs. “OCHA on Message: Humanitarian Access.” UNOCHA, 2010.](#)

⁷⁵ Article 54(1) of the 1977 Additional Protocol I and Article 14 of the 1977 Additional Protocol II to the Geneva Conventions. The ICC Statute defines [“\[i\]ntentionally using starvation of civilians as a method of warfare by depriving them of objects indispensable to their survival, including wilfully impeding relief supplies as provided for under the Geneva Conventions” as a war crime in international armed conflict.](#)

⁷⁶ Collinson, Sarah, and Samir Elhawary. “Humanitarian Space: A Review of Trends and Issues.” *Humanitarian Policy Group Report* 32. London: Overseas Development Institute, 2012; Steets, Julia, Urban Reichhold, and Elias Sagmeister. *Evaluation and Review of Humanitarian Access Strategies in DG ECHO Funded Interventions*. Berlin: Global Public Policy Institute, 2012, p. 23–24.

⁷⁷ The Security Council had frequently called upon states to grant humanitarian access, but it had never before waived the right of consent. Gillard, Emmanuela-Chiara. “The Law Regulating Cross-Border Relief Operations.” *International Review of the Red Cross* 95, no. 890, 2013, p. 351–82.

⁷⁸ Leader, Nicholas. “The Politics of Principle: The Principles of Humanitarian Action in Practice.” *HPG Report* 2. London: Overseas Development Institute, 2000. The Sphere Standards, for example, stress the “right to receive humanitarian assistance” as a “necessary element of the right to life with dignity”. See also [Modirzadeh, Naz K. “Strong Words, Weak Arguments – A Response to the Open Letter to the UN on Humanitarian Access to Syria \(Part 1 and 2\).” *Opinio Juris*, 12 May 2014.](#)

important gap in the Geneva Conventions is that they do not solve the question of the consent of non-state armed groups for access to territories they control. While non-state armed groups are often central in today's armed conflicts, the legal provisions concerning their rights and responsibilities regarding access are unclear.⁷⁹

32. The main legal framework of WFP, the [general rules and regulations](#), only demands that recipient governments facilitate the access of WFP staff for monitoring and assessing the results of food assistance projects. With the 2006 [note on access](#), it adopted a broader definition:

“Humanitarian access involves the free and unimpeded movement of humanitarian personnel to deliver relief services, or the free and safe movement of humanitarian agencies to reach civilians who are trapped, unable to move or detained because of armed conflict, natural disasters and other difficult access situations. Humanitarian access allows impartial assessment of the needs of populations at risk and the delivery of assistance to respond to those needs.”

This definition focuses on the access of humanitarian organizations to people in need and does not further elaborate on the other side of the coin – the ability of affected people to access humanitarian assistance (which is part of the WFP [protection policy](#)).

33. The note on access is also not called a “policy” and was submitted to the Executive Board for consideration rather than for approval. It stresses that it is not possible to standardize the WFP approach to access but identifies aspects considered crucial for access. These aspects include situation analysis, security awareness and management, adherence to international law and humanitarian principles, coordination and partnerships, advocacy, and learning and training. This list, however, only describes which ingredients are important; it does not prescribe what WFP should do to strengthen these areas and improve its capacity to negotiate appropriate, context-specific access. Internal stakeholders explain that there was considerable discussion among members of the Executive Board before agreeing on the text.

⁷⁹ Akande, Dapo, and Emanuela-Chiara Gillard. *Oxford Guidance on the Law Relating to Humanitarian Relief Operations in Situations of Armed Conflict*. Oxford: Oxford Institute for Ethics, Law and Armed Conflict, 2016.

2. Findings

34. This chapter presents the findings of this evaluation. It starts with findings on the quality of the policy documents and their implementation measures. It then looks at the results of the policies and organizational practices relating to them. Finally, it analyses factors that have affected these results.

2.1. Quality of the Policy Documents and Implementation Measures (EQ1)

Humanitarian Access

35. **Largely coherent policy document:** The 2006 note on humanitarian access is based on an internal review of WFP experiences in securing access that was conducted in 1999–2000 and resulted in the publication of an information pack on the role of WFP in access. The policy document is largely coherent, both internally and with other WFP policies, in particular the WFP Risk Appetite Statement, the Executive Director’s circular on escalation and decision-making structures, the risk management policy, and the programme criticality approach.

36. Based on an analysis of WFP access practices at the time, the note on access offers a description of obstacles to access and their effects that remains broadly valid today. While the division of labour in access negotiations varies in practice, the description of the actors and their basic roles in the policy is adequate. Interviewees confirmed the policy’s assumption - that it is not possible to standardize a WFP approach to access - by highlighting the fact that access negotiations are highly context specific. The components of the “toolkit of broad policy approaches and sound practices” proposed in the policy – situation analysis, security awareness and management, international law, humanitarian principles and minimum requirements, coordination, civil-military relations, advocacy, partnerships and alternative approaches to access, and learning and training – all remain relevant today, even though the crucial role of cooperating partners in achieving access could be more clearly emphasized. The document is also coherent with other WFP policies. For example, it restates the humanitarian principles, includes references to gender, and confirms the prohibition against paying for access.

37. **Narrow definition of access:** The note on access restates the WFP objective of ensuring that all affected populations have access to the food assistance required for their survival. Subsequently, however, it adopts a more narrow definition of access, which only focuses on WFP access to people in need, not the access of people in need to assistance, which is covered through the WFP protection policy.

38. **No definition of “red lines”:** The note on access includes short sections on international law, humanitarian principles, and minimum operational requirements. These sections provide some examples of possible compromises regarding these norms in dire situations. It does not provide a clear set of “red lines” that must not be crossed under any circumstances or guidance on how to deal with typical trade-offs. The vast majority of people interviewed for this evaluation support this approach, stressing that acceptable compromises always depend on the context.⁸⁰

⁸⁰ An evaluation conducted for ECHO reaches the same conclusion; see [Steets, Julia, Urban Reichhold, and Elias Sagmeister. Evaluation and Review of Humanitarian Access Strategies in DG ECHO-funded Interventions. Berlin: GPPI, 2012.](#)

Humanitarian Principles

39. **Useful confirmation of adherence to system-wide principles:** It is important for WFP – operating in some of the most acute conflicts and on such a large scale – to formally confirm adherence to the humanitarian principles. The policy on humanitarian principles adopts definitions of the core humanitarian principles that align very closely with those used by the humanitarian sector as a whole (see Table 3) and thereby avoids contradictions and confusion.

40. **Mixing different standards:** However, the policy subsumes a long list of different kinds of standards under “humanitarian principles” – not only the core principles of humanity, impartiality, neutrality, and independence, but also WFP foundations of effective humanitarian action and standards of accountability and professionalism. Mixing the core principles with other standards increases the risk of confusion and dilutes their importance. The policy has fostered an understanding of “humanitarian principles” within WFP that blends a broad set of standards without prioritizing among them, with 26 percent of staff members interviewed unable to identify the core principles. Other organizations distinguish different types of standards more clearly. The [policy of the](#) Norwegian Refugee Council (NRC), for example, mentions the humanitarian principles as part of its mission statement, thereby giving them higher priority than other elements. UNICEF also clarifies its commitment to the humanitarian principles in its main humanitarian policy, the [Core Commitments for Children](#), distinguishing them clearly from other quality considerations. The ICRC recognizes the humanitarian principles as “[fundamental principles](#)” that define the identity of the movement, along with voluntary service, unity, and universality.

41. WFP has a dual mandate for emergency and development operations. The policy document does not distinguish between these types of engagement. Consistent with this, the majority of staff members interviewed understand the core humanitarian principles as applicable to all WFP operations. This raises internal questions – for example, how the work of WFP through government agencies can be reconciled with the principles of independence and neutrality. This is important in both humanitarian and development settings. Under United Nations resolution 46/182, WFP is committed to “the primary responsibility of the state to assist and protect” and this is further underscored in recent reforms as part of the Integrated Road Map and the alignment of WFP with the Sustainable Development Goals, which seek to strengthen the agency’s partnership with host governments. Currently however, WFP staff lack policy direction and guidance as to how to be neutral, impartial, and “operationally” independent, while at the same time encouraging and supporting governments to fulfill their responsibilities. This is particularly challenging in development settings which are at risk of conflict, have pockets of conflict, or are sliding toward conflict, and the relationship to date has not placed enough emphasis on the humanitarian principles.

42. **Unanswered questions:** The statement of humanitarian principles leaves important questions unanswered. For example, it does not clarify how the principles relate to each other. Many WFP staff members therefore believe that humanity is the main principle and that it can be used to justify far-reaching compromises on the other principles. The ICRC, by contrast, tends to understand humanity – and impartiality, as the practical application of humanity – as the main objective, and neutrality and independence as the necessary means to be able to pursue this objective. This interpretation results in the increased independence of the principles and potentially provides less room for compromises.⁸¹ Similarly, the policy document does not acknowledge potential tensions between the different principles and is not accompanied by any guidance document explaining how to deal with these tensions. By contrast, NRC’s position paper on humanitarian principles in practice⁸² explains in brief terms how the principles should be

⁸¹ Labbé, Jérémie, and Pascal Daudin. “Applying the Humanitarian Principles: Reflecting on the Experience of the International Committee of the Red Cross.” *International Review of the Red Cross* 97, no. 897/898, 2016, p. 186–87

⁸² NRC. *Position Paper: Humanitarian Principles in Practice*. 2016.

applied, and a range of additional [publications](#) discuss their application in various fields of work in much more detail. The ICRC also has [separate publications](#) discussing how the principles apply in practice in different contexts. In addition, there continues to be some conceptual confusion on operational independence within WFP. A number of interviewees noted that they could not explain the practical difference between independence and operational independence, and some were unaware that any form of independence was reflected in the policy.

43. **Coherence and some unacknowledged tensions with other policies:** The statement on humanitarian principles and other policies largely support and reinforce each other. However, unacknowledged tensions include the following:

- The WFP [Gender Policy](#) (2015-2020) includes a “gender transformative approach” that promotes gender equality and women’s empowerment. This is often designed to avoid reinforcing power imbalances, address existing discrimination and enable the impartial delivery of assistance. It is also in line with the Convention on the Elimination of All Forms of Discrimination Against Women, which has been ratified by most countries. Nevertheless, women’s empowerment remains a socially and politically controversial agenda in some WFP operating contexts. Its application can therefore create perceived tensions with the principle of neutrality - the fundamental decision taken by humanitarians not to engage in political controversies whatever their nature in order to be able to operate on all sides. While senior management was not conscious of this tension, staff members provided some practical examples of it – for example, local resistance to the insistence of WFP on the representation of women in aid committees, which made access to communities more difficult in some contexts. The [country portfolio evaluation for Afghanistan](#) also mentions controversies and tensions surrounding positive discrimination with regard to women.
- In theory, there is also a tension between neutrality and the WFP Policy on [Participatory Approaches](#). Similar to the gender policy, this policy aims to address existing exclusion and discrimination by strengthening the representation of the poorest and the marginalized in community structures. It also foresees a role for WFP in advocating for people’s right for their voices to be heard, which can be politically controversial. There were, however, no practical examples in which this tension became apparent.

44. Due to a lack of documentation and institutional memory, the evaluation could not establish whether or not the policy was informed by adequate research and analysis.

Policy Implementation Measures

45. **Ineffective policy dissemination:** WFP mainly communicates policies by announcing them via email, and all policy documents are stored on the WFP intranet. However, several interviewees reported that they could not find the policies on access and humanitarian principles when they looked for them ahead of the evaluation interview. The policy documents are also long and focus on background and context, but they provide little operational guidance. Field staff therefore perceive policies in general as minimally relevant. WFP does not have an updated policy or operational field manual, and many older staff members still use the operations pocketbook from 2002.

46. **No implementation measures included in the policies:** Neither of the two documents spells out what measures WFP should take to implement the policies. The statement on humanitarian principles states the principles and does not discuss the steps necessary to apply them in practice at all. The document on humanitarian access is more detailed and contains a list of broad policy approaches and sound practices. Implicitly, this list suggests which organizational capacities could be strengthened to improve the capability of WFP to negotiate principled access. However, the document provides minimal practical guidance and does not define a programme for further strengthening access. Therefore, the policies also failed to define clear institutional responsibilities for follow-up. While WFP later received around USD 550,000 in extra-budgetary funds to support activities on access,⁸³ the agency did not dedicate any budgetary resources for implementation at the time of adopting the policies.

47. **Operationalization of humanitarian principles through protection and other policies:** Since the adoption of the statement on humanitarian principles in 2004, WFP has not implemented any direct, dedicated measures for rolling out the policy. Instead, WFP conceptualized its work on protection – first through the protection project and later through the WFP Humanitarian Protection Policy (2012) – as a way of operationalizing the principles. The protection policy and related implementation measures were evaluated separately. Other policies – for example, the gender policies (2009 and 2015), the WFP Policy on Participatory Approaches (2000), the WFP Strategy on Accountability to Affected Populations (2016), and the WFP Policy on Emergency Needs Assessments (2004) – also provide more detail on important issues relating to humanitarian principles. However, as discussed in paragraph 52, this approach was not successful in creating a good understanding of the humanitarian principles among WFP staff and thereby creating the foundation for their consistent application.

48. **Lack of synergies between different quality aspects:** Efforts to strengthen different aspects relating to the “how to” and the quality of assistance are fragmented. Whereas the main responsibility for protection and accountability to affected populations lies with different teams in the emergencies and transition unit (OSZPH), responsibilities related to access are split across different units, and another office altogether has responsibility for gender. As a consequence, field staff interviewed for this evaluation did not always understand how the different “how to” and quality aspects relate to each other. Moreover, synergies between implementation measures for the different issue areas – such as training, guidance, support capacities, or missions – are not fully explored.

49. **Recent increase in efforts to implement the access policy:** Few direct measures were taken to implement the access policy after its adoption. Over the past few years, there has been a marked increase in activities, including the following:

⁸³ Including CHF 300,000 from the Swiss Government to support the access cell and its activities and USD 250,000 from DFID for an access project in Afghanistan, paying for a consultant, access mapping, and humanitarian access training for the team.

- **Documenting lessons learned:** WFP developed lessons learned papers and case studies on access as far back as 2002, when preparing for the policy. However, these are no longer available. Background papers were also created for a [conference](#) held in 2009, as well as a workshop on access organized in 2015. WFP also co-financed and contributed case studies to a book on humanitarian diplomacy, published in 2007.⁸⁴ Since these activities were not embedded in a broader organizational effort regarding access at the time, the materials are not readily available and not widely known today.
- **Advisory group and access cell:** Following a recommendation of the 2015 workshop on access, WFP created a director-level advisory group on access and a technical access cell involving the policy and programme, emergency preparedness and response support, supply chain, and field security divisions in 2015. The advisory group developed a strategy for enhancing WFP access capabilities, focusing on: the critical reflection and documentation of access approaches; equipping staff with an operational framework, field guidance, and training; and establishing a professional support network. Most of the activities discussed below are based on this strategy. Drawing on extra-budgetary funds from the humanitarian protection project trust fund, WFP hired a full-time consultant in 2015 and developed a more detailed work plan for the access cell. At the time of this evaluation, a number of activities had been implemented (see below). However, the work of the access cell suffered from staffing discontinuities, and the support function of the groups was not widely known in the field. A network analysis conducted as part of this evaluation shows that WFP field staff only very rarely turn to headquarters for advice on difficult access issues, reflecting the high level of decentralization within WFP, reinforced through its 2012 [Fit for Purpose](#) reform initiative (see Annex IX for more details).
- **Designation of access focal points:** Some regional bureaux have designated their humanitarian adviser as the access focal point. In Dakar and Bangkok, for example, these focal points identified training opportunities or provided training on access, conducted support missions to country operations, and provided strategic advice on access and legal issues. Country offices generally very much appreciated this support and advisory role, even though the necessary follow-up did not always take place. In one case, for example, an access strategy was developed but had still not been rolled out six months later. The role of the humanitarian advisers also differed greatly between regions. The terms of reference for the position in Cairo only referenced humanitarian principles, not access, and the adviser position in Nairobi focused on gender and protection. Some crucial country operations also have (or had) access focal points – in some cases as a full-time role, in others as an additional responsibility. This includes, for example, the operations in Afghanistan, South Sudan, Somalia, and Yemen.
- **Access training and support missions:** WFP headquarters and regional bureaux organized training sessions on access at the regional and country levels, as well as support missions. It was not possible to establish a full overview of all the training conducted because WFP does not maintain a record of training sessions. Some interviewees recalled context-specific access training conducted in 2007 (e.g. in Sri Lanka). An overview compiled by the Dakar regional office suggests an increase in training activity from 2015 onward. Country-specific access training was often carried out in combination with country support missions, usually involving the joint development of an access strategy. In 2016, the policy and programme division organized or supported access training in Ukraine, Iraq, Afghanistan, Dakar, Rome, and Mali. WFP also conducted the first training of trainers on access in 2017. Those who participated in the training generally provided positive feedback (except in one case where relevant language

⁸⁴ Minear, Larry, and Hazel Smith, eds. *Humanitarian Diplomacy: Practitioners and Their Craft*. Tokyo: United Nations University, 2007.

skills were missing), but so far only a small number of staff have participated, and there have been no mechanisms for following training of trainers on access with training sessions at the field level. WFP also disseminated basic information on the humanitarian principles in the form of posters (in 2008 and 2017) and pocket cards (2017). The posters were visible in some of the country/sub-offices and regional hubs visited for this evaluation, but they had no evident effect on the ability of staff and partners to explain what the principles are or what they entail.

- **Inclusion of elements on access and principles in other training:** Components on negotiations, access, and humanitarian principles have also been included in other corporate training. The most detailed reflection is found in the [programme learning journey](#) for emerging programme leaders, which involves reflections and case studies on compromises and trade-offs regarding humanitarian principles and access. It also includes a dedicated video on humanitarian principles that gives advice on how to deal with trade-offs. Smaller components were also included in the WFP intensive, simulation-based functional and support training for emergency response (FASTER) training, in an [online training](#) on ethics (focused on neutral and impartial staff behaviour, as derived from codes of conduct), and in protection training sessions organized by headquarters or the Dakar regional office. The few interviewees who had participated in one of these training sessions tended to find the training mostly useful to their understanding.
- **Guidance:** The policy and programme division developed an operational guidance manual on humanitarian access, which was finalized in 2017. It offers similar content as an earlier [practitioners' manual](#) on humanitarian access developed by the Swiss Government, OCHA, and Conflict Dynamics International (2014). The WFP manual includes background information on access and provides guidance on how to develop an access strategy. In addition, the manual discusses how to deal with dilemmas, something the policies leave unaddressed. While the manual is better at taking the specific needs and operational modalities of WFP into account, it puts more emphasis on thresholds of acceptability (red lines), the impact of decisions on other humanitarian organizations, and the long-term effects of decisions. At the time of this evaluation, the WFP manual had not been widely disseminated. The few staff members who had received it found it generally useful, but long.
- **Centre of Competence on Humanitarian Negotiation:** In partnership with the ICRC, UNHCR, Médecins Sans Frontières (MSF), and the Centre for Humanitarian Dialogue, WFP contributed to the creation of a [Centre of Competence on Humanitarian Negotiation](#) in 2015. WFP has supported the activities of the centre through active engagement: for example, by seconding a full-time P5 staff member to the centre in 2017, by making staff available to participate in and facilitate field missions and training, by supporting the development of country case studies, and by actively engaging in the centre's geographic working groups as well as annual meetings of frontline negotiators. By the end of 2017, 105 WFP staff had participated in week-long regional training workshops. The few participants interviewed for this evaluation generally appreciated the space for reflection provided by this training, especially the exchange with staff from external organizations, such as the ICRC and MSF. However, some suggested that there is limited learning and analysis generated by the centre currently flowing back to WFP.

50. **Insufficient corporate priority for humanitarian principles and access:** WFP staff members welcome the recent increase in efforts to implement the access policy. However, a majority of interviewees continue to see humanitarian principles and access as areas that do not receive enough corporate attention and support. Interviewees unanimously saw humanitarian principles and access as areas that are central to the WFP mission and mandate (with 82.9 percent of interviewees who voiced an opinion on this matter identifying them as “highly relevant” and

16.6 percent as “relevant”) and at the same time extremely challenging in many operations. Relative to how critical these areas are, interviewees see corporate investment in them as insufficient: dedicated measures to implement the policies were only taken very recently, almost a decade after the policies had been adopted. To date, relevant initiatives have been funded by extra-budgetary means but have not received dedicated shares of the WFP budget. The level of resources invested is low, with humanitarian principles and access operating on a total budget of USD 320,000 from 2015 to 2016, corresponding to 7.4 percent of the USD 4.3 million raised for the trust fund for the humanitarian protection project.⁸⁵

51. **Policies alone not sufficient to guide decision-making:** The impact of the few implementation measures taken to date have not been felt at the field level. In the survey, WFP staff indicated that the policy documents themselves were most helpful for knowing how to apply the principles and understanding the WFP approach to access. In interviews, however, only 29 percent stated that they had seen the policy documents (and that number included many who had looked them up explicitly for this evaluation). Among those interviewees who knew the policy documents, more criticized the policies than praised them. Most felt that the documents were too long and not practical enough to be useful in the field. Only field staff who were themselves involved in policy making – for example, supporting a host government in developing its humanitarian policies or providing guidance to others – found the policies useful. The policies themselves are thus not sufficient to directly inform decision-making. Rather, WFP managers (P4 or above) most frequently cited their own practical experience, discussions during office meetings, or advice from experienced WFP members as most helpful for them to know how to apply the humanitarian principles or negotiate access. Respondents mentioned implementation measures, such as training sessions or guidance materials, less frequently (Figures 2 and 3).

⁸⁵ WFP. Evaluation report – *WFP’s Humanitarian Protection Policy, Draft*. 2017.

Figure 9: Survey responses on the most helpful factors for applying the humanitarian principles (up to three answers)

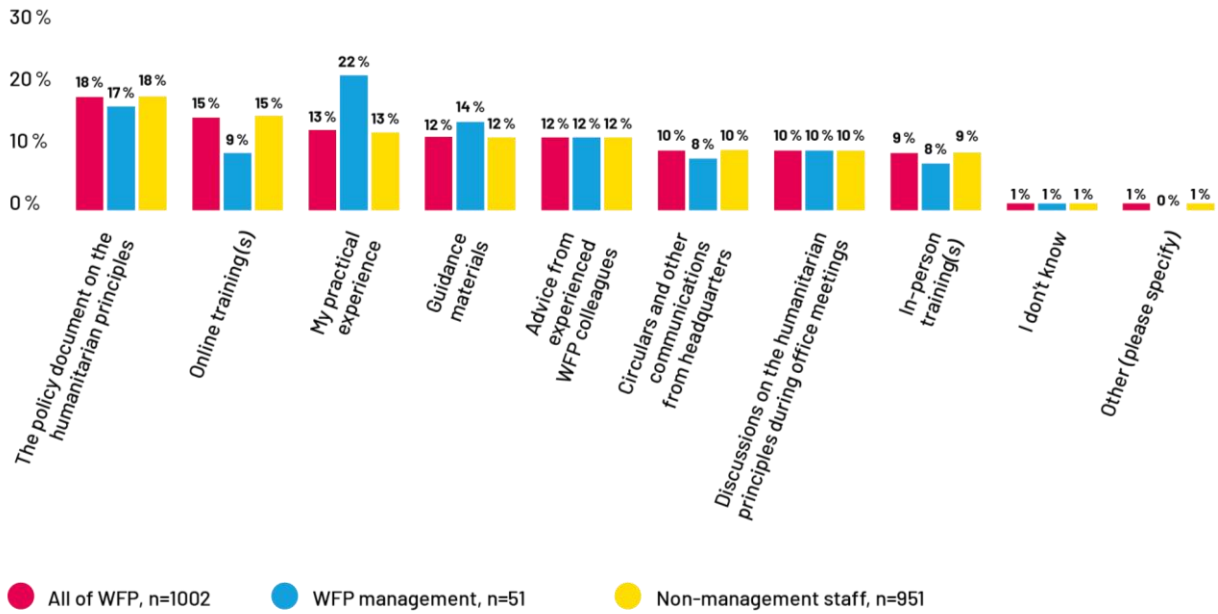
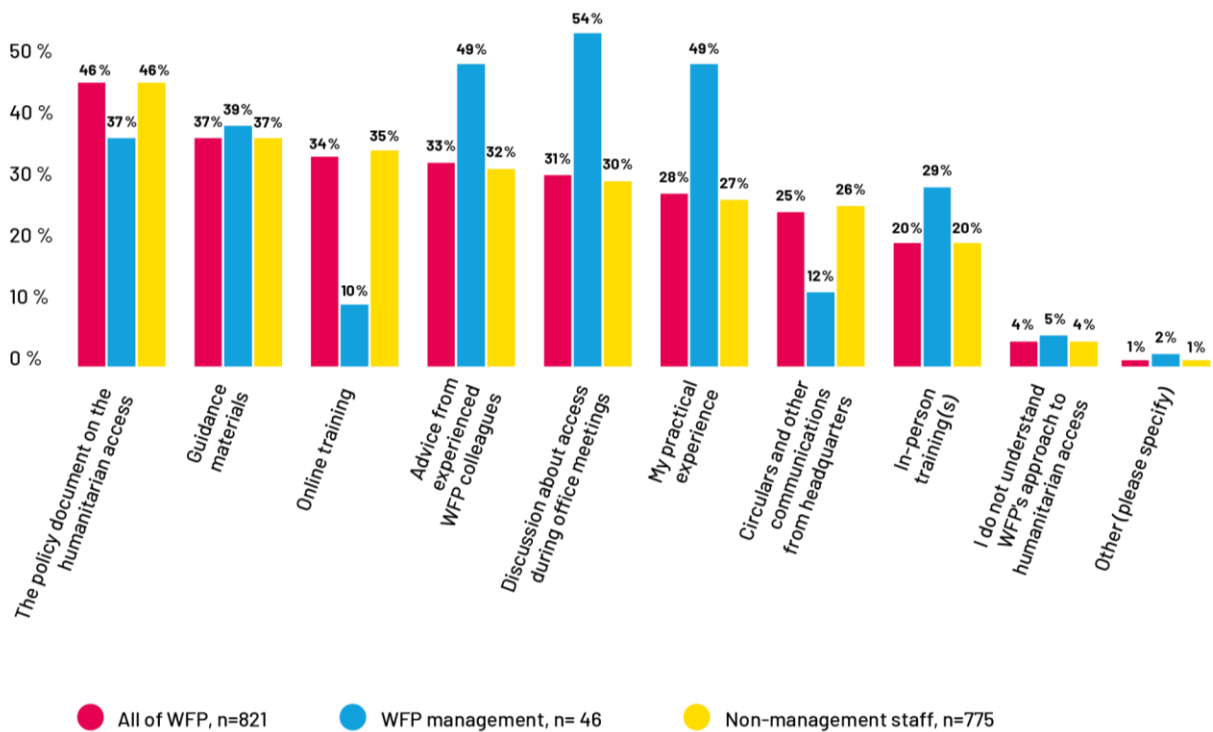


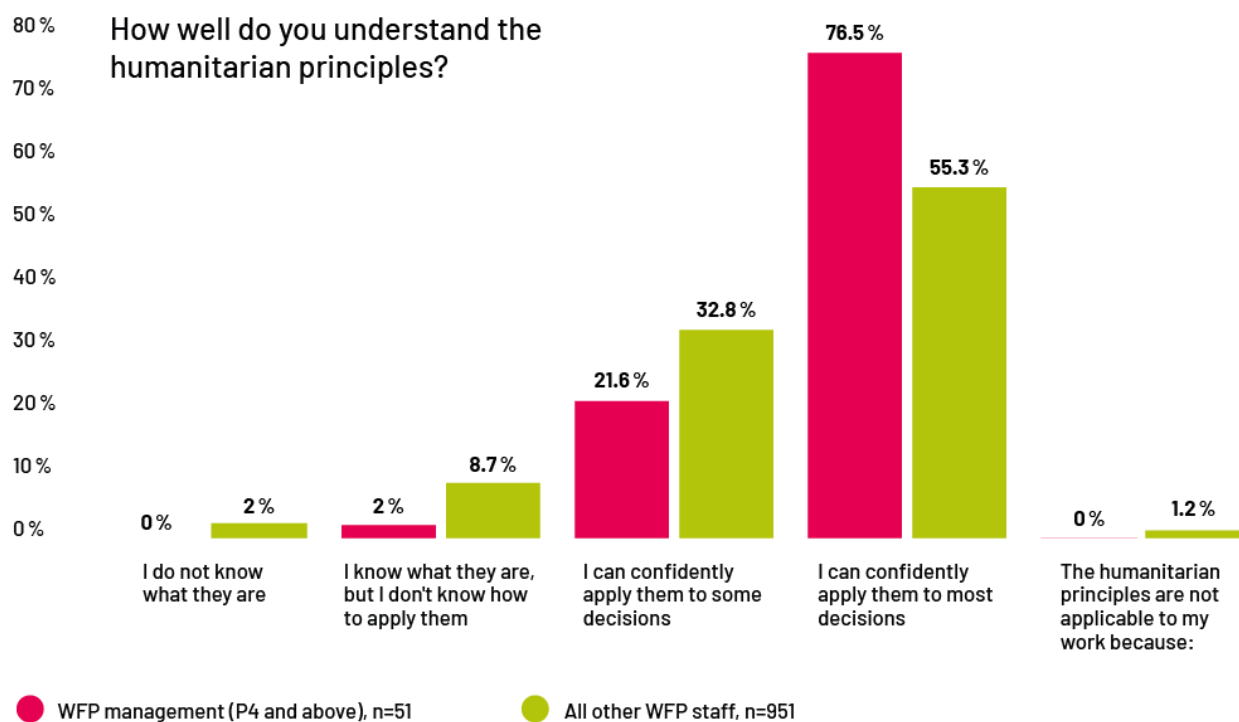
Figure 10: Survey responses on the most helpful factors for understanding how WFP handles access questions (up to three answers)

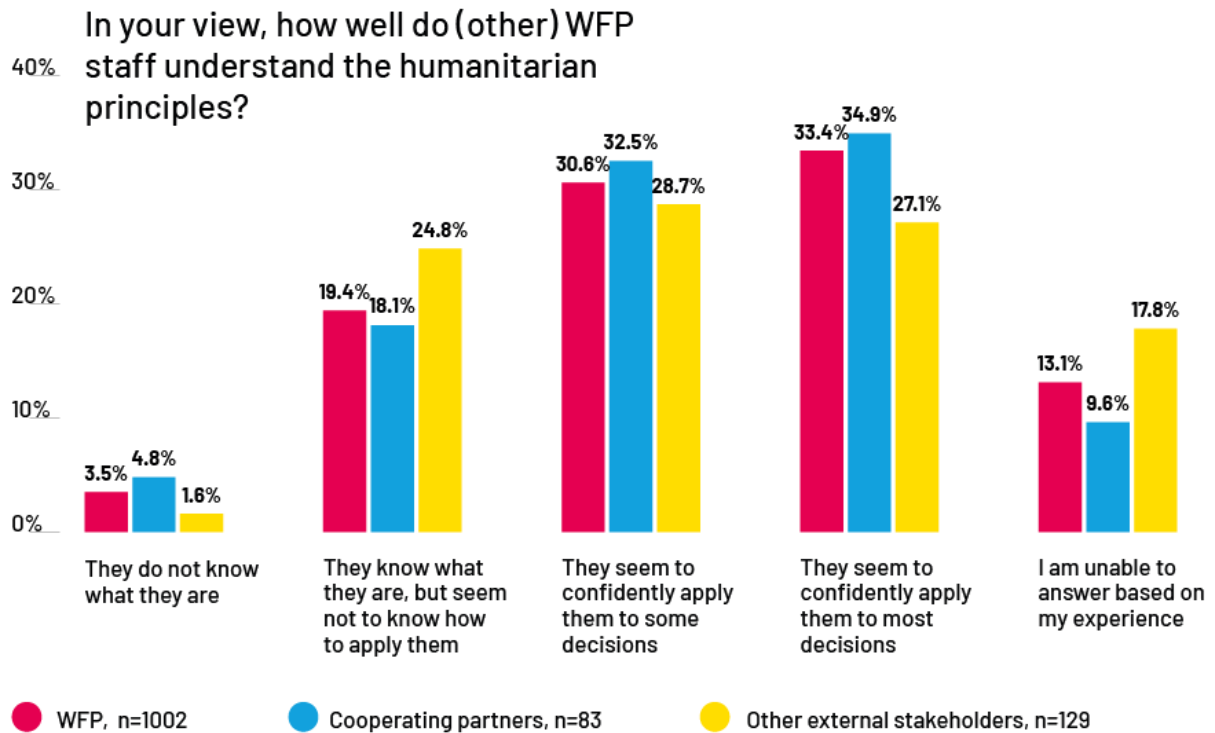


Awareness and Understanding of the Policies

52. **Highly variable levels of understanding of the humanitarian principles:** The level of understanding of the core humanitarian principles and their practical implications varies greatly across WFP. When assessing their own performance in the survey – where one would expect respondents to overstate their level of understanding – 55.3 percent of WFP staff up to level P3 believe they could apply the principles confidently to most decisions. However, 10.7 percent admitted that they do not know the humanitarian principles or do not know how to apply them. As Figure 4 shows, self-perceptions among WFP managers (at P4 level or above) are more positive. As expected, respondents were more skeptical when assessing colleagues or peers. Among WFP staff members, 22.9 percent believe that their own colleagues either do not know the humanitarian principles or do not know how to apply them, Twenty one percent of cooperating partners share this opinion of WFP staff, as do 25 percent of other external stakeholders.

Figure 11: Survey responses on understanding humanitarian principles





53. The interviews conducted for this evaluation confirm this lack of consistency. While the evaluation team assessed the level of understanding of a majority (52 percent) of interviewed WFP staff members as good and 22 percent as very good, the team also felt that 25 percent of WFP staff members displayed only very partial knowledge of the principles.⁸⁶ These numbers reflect a positive bias, since some operations held a short training or briefing for staff members on the humanitarian principles before the evaluation team arrived, and several offices prominently displayed posters listing and explaining the humanitarian principles. Within this variation, staff members generally had a better understanding of humanity (understood as the humanitarian imperative to help those in need) and impartiality (understood as providing assistance based on need and without discrimination) than of neutrality and independence. When asked about humanitarian principles in general, staff members also tended to refer primarily to ethical norms and standards of individual behaviour – such as prohibitions against sexual exploitation and abuse, fraud, and corruption – reflecting the focus of WFP mandatory online ethics training and the lack of clarity on the principles policy itself.

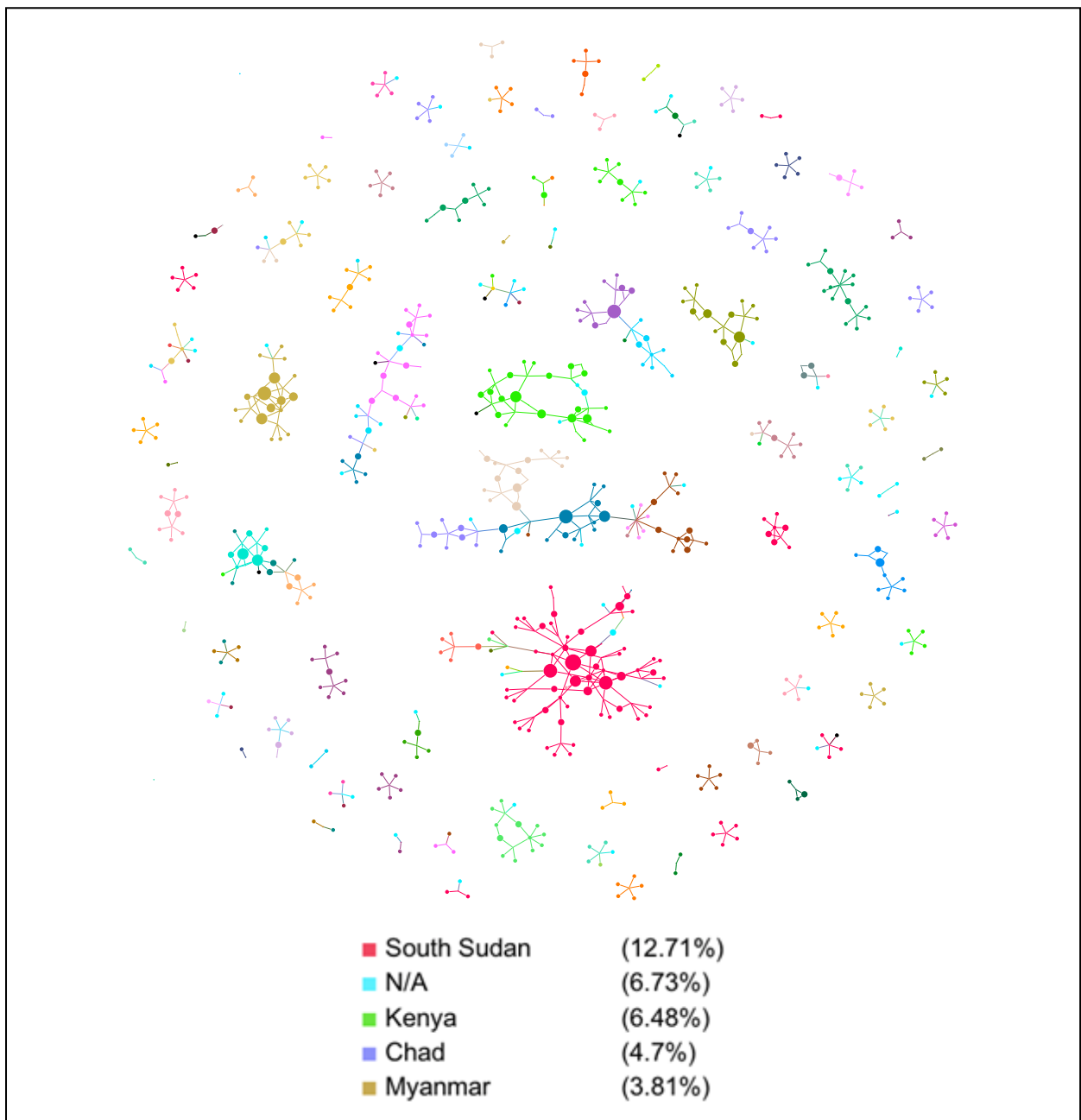
54. **Little awareness of the policy on access:** Very few of the staff members interviewed were aware (at least prior to this evaluation) that WFP had a policy on humanitarian access. Nevertheless, a clear majority of interviewees had a good understanding of the roles humanitarian coordinators, OCHA, and WFP played in negotiating access. Staff saw Country Directors as bearing the ultimate responsibility for both humanitarian principles and access, but at times had different opinions on what issues should be decided at what level. For particularly sensitive access issues, some Country Directors consult with the Assistant Executive Director for operations services, but others do not, and some perceive access to this “inner circle” as uneven. Other key actors in the WFP hierarchy, such as the Strategic Task Force, the Director of Emergencies, or the Corporate Response Director for L3 emergencies, were not mentioned explicitly by the sample of individuals interviewed for this evaluation.

55. **Country-focused access networks:** The vast majority of access questions are only discussed at the country level. A network analysis based on 206 responses shows that access

⁸⁶ There were no differences in the level of understanding between women and men.

networks are highly decentralized (Figure 5). These largely country-based networks have almost no connection to headquarters. Of the connections staff members named, when asked who they turn to when facing tricky access questions, only around 1 percent were based at headquarters. The network is also fragmented and includes only a few peers that staff from various operations rely on as access experts. These are almost exclusively men, international, professional staff, working in either programming or security, at a relatively high grade. This network structure reflects the decentralized nature of WFP and enables quick and flexible decisions. However, it requires highly competent staff and a strong and coherent understanding of the WFP corporate approach to access and the implementation of the humanitarian principles to achieve consistency across the organization.

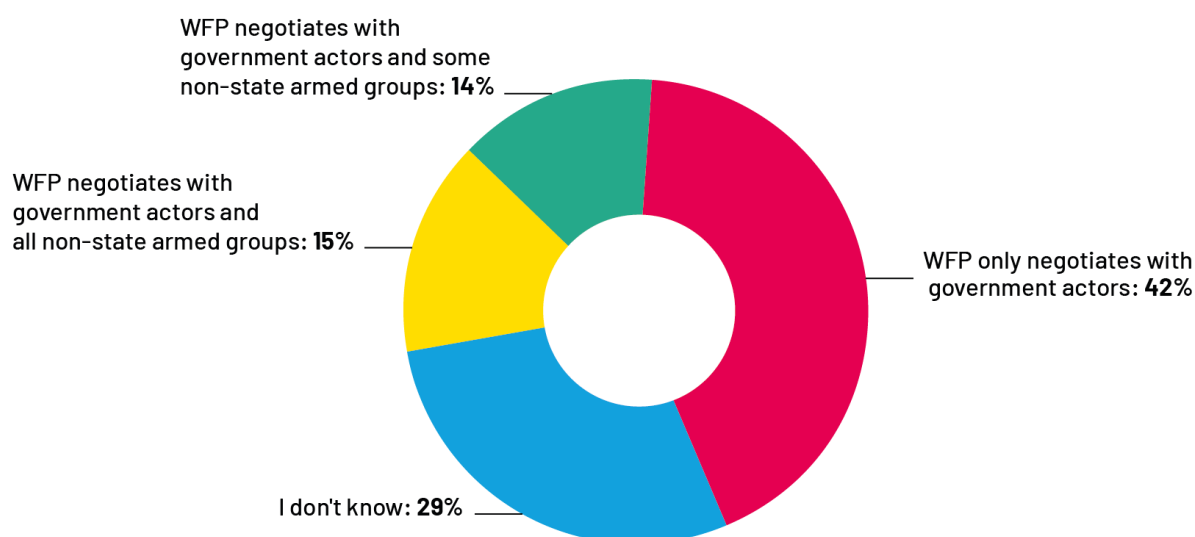
Figure 12: Access networks in WFP, based on survey responses



56. As well as low awareness of the policy and the fact that there are fragmented networks, another issue is that important aspects of the approach of WFP to access remain unclear. While the policy clearly states that WFP may need to engage with armed groups, WFP staff are very uncertain about this. Among the staff members interviewed, 47 percent believe WFP does not have a mandate to engage or negotiate with such groups, while 53 percent believe WFP is allowed to engage and that negotiations with all the groups involved are crucial for access. Survey results are similar, with 43 percent of respondents stating that WFP only negotiates with government actors in their context (Figure 6). Only 5 percent gave reasons related to the lack of relevance of non-state armed groups in their context, while 38 percent explained that the host government or the WFP mandate or its status as a United Nations agency does not allow WFP to talk to non-state armed groups, or that talking to them would violate the humanitarian principles. It is also often unclear who within WFP plays what role in access negotiations. Current arrangements vary widely

by function and staff level and variously involve field management, security, logistics, programmes, inter-functional access groups, or designated access focal points.

Figure 13: Survey responses on who WFP negotiates with



WFP staff (n=821)

Policy Application to Partners

57. **Reflection of humanitarian principles in field-level agreements:** WFP relies heavily on cooperating partners and commercial contractors in its work. Globally, WFP delivers [75 percent](#) of its programmes through partners. Their role is even more central in areas where WFP faces restrictions on its own access and freedom of movement. Policy implementation therefore critically depends on the extent to which partners adhere to the policies. The most important instrument governing the relationship between WFP and its cooperating partners is the [field-level agreement](#). This agreement includes several references to the humanitarian principles. It requires partners to provide assistance in an impartial manner. It mentions some aspects of neutrality, requesting that partners acknowledge that activities are not intended to promote a specific religious faith or political persuasion. Other aspects, including independence, are only referenced indirectly, as partners are requested to follow the sector-wide [code of conduct](#). Contracts with commercial suppliers do not include equivalent provisions.⁸⁷ Except for preventing sexual exploitation and abuse, WFP does not usually define any norms or standards for how they conduct their business with respect to humanitarian principles and access – for example, how transporters deal with roadblocks or requests from armed groups when transporting WFP commodities. The commercial providers interviewed therefore reported that they find their own ways of dealing with access challenges and that they are often reluctant to report challenges or the compromises required in dealing with them, either because the associated costs are reflected in the contract price or for fear of losing the contract.

58. **Very few other policy implementation measures for partners:** Beyond the reflection of some of the humanitarian principles in field-level agreements, the evaluation found few other efforts to encourage partners to apply the policies. The vast majority of training, workshops, and conversations that partners reported focused on technical and operational issues, including some

⁸⁷ See, for example, [WFP. Doing Business with the United Nations World Food Programme. 2013.](#)

of the operational implications of impartiality. There were very few exceptions where WFP included information on the humanitarian principles for partners as part of the general introduction on its mandate or as part of protection training.

59. **Access/capacity to deliver as a key selection criterion for partners:** While partners found it difficult to describe the WFP approach to access, they all agreed that partner organizations must be able to deliver and must have access to relevant areas. For the most part, they therefore saw it as their own responsibility to gain and maintain access, and some noted they were primarily selected due to their ability to access a specific area. In a competitive environment, many partners felt compelled to maintain this access, even when this required significant compromises regarding principles. Many partners depend financially on WFP and therefore accept these compromises. A small but vocal number of international NGOs, however, refused to cooperate with WFP in certain contexts because they were not prepared to compromise their humanitarian principles to the extent required to maintain access.

60. The cooperating partners and commercial providers interviewed were also almost unanimously of the opinion that their adherence to humanitarian principles was not an important criterion in due diligence and partner selection by WFP. The WFP corporate due diligence process requires checking organizations against the United Nations sanctions list. WFP does not generally verify the political affiliations of organizations or their connections with parties to the conflict.⁸⁸ Interviewees provided examples indicating that current selection and vetting procedures are insufficient: in one operation, a WFP partner also implemented a political stabilization project for the United Nations mission in the same area; in another, the partner sub-contracted a local organization with an overtly religious orientation; and in others, commercial partners also worked for political actors and parties to the conflict without the knowledge of WFP. Aware of this corporate shortcoming, some country offices, including those in Syria and Yemen, have started to develop their own due diligence standards, which WFP could build on for a stricter and more coherent corporate approach.

61. Generally, many cooperating partner interviewees criticized the lack of discussion with WFP about strategies, approaches and principles. Several mentioned ECHO as a best-practice example and recommended that WFP adopt similar practices. In particular, they suggested that WFP should publish an annual country strategy for cooperating partners (similar to the [humanitarian implementation plans](#) produced by ECHO), which clearly states principles, priorities, and preferred approaches for the response. They also recommended systematically organizing information and kick-off workshops, especially with new partners, that would also cover the expected principles and standards and how access obstacles are addressed between WFP and the partner.

2.2. WFP Progress on Humanitarian Principles and Access (EQ2)

Obstacles to Access

62. **Access obstacles in most humanitarian operations:** Obstacles to access occur very frequently. Twenty out of 22 evaluations⁸⁹ of WFP emergency operations and project reports for

⁸⁸ Only the [guidance on third-party monitoring](#) suggests conducting background checks on potential links with parties to the conflict and compromises regarding humanitarian principles.

⁸⁹ Evaluations mentioning constraints include: WFP (2016) "Afghanistan, PRRO 200447, Assistance to Address Food Insecurity and Undernutrition: An evaluation of WFP's Operation (2014 - 2016)"; WFP (2012) "Afghanistan: An Evaluation of WFP's Portfolio"; WFP (2016) "Evaluación de la Operación Operaciones Prolongadas de Socorro y Recuperación – América Central 200490 Restablecimiento de la Seguridad Alimentaria y los medios de subsistencia de los grupos vulnerables afectados por crisis recurrentes en El Salvador, Guatemala, Honduras y Nicaragua (2014-2016)"; WFP (2010) "Chad: An Evaluation of WFP's Portfolio (2003 – 2009)"; WFP (2014) "La République Démocratique du Congo: Une évaluation du portefeuille du PAM (2009-2013)"; WFP (2015) "Ecuador, Operación Prolongada de Socorro y Recuperación 200275, Operación de Asistencia a Refugiados y Personas Afectadas por el Conflicto en Colombia: Evaluación Final de la Operación

20 out of 22 countries mention access difficulties that constrain the ability of WFP to serve people living in certain areas. Five of 15 country-specific internal audits include medium-risk or high-risk observations related to access.⁹⁰ Through interviews, the evaluation team identified 23 ongoing emergency operations that face significant access issues.⁹¹

63. **Similar constraints over time:** The types of access obstacles WFP faces have remained similar over time. The obstacles mentioned in interviews for this evaluation and included in the WFP operational guidance manual on access published in 2017, cover essentially the same types that were already discussed in the WFP access review published in 2000.⁹² Which types of obstacles are most important depends on the context, and their relative severity changes over time. For the 20 countries that submitted data on various factors potentially affecting access in the third quarter of 2016, obstacles in obtaining visas were most frequently indicated as presenting “very high” obstacles (11 percent of 312 provinces covered) and frequently presented as “medium” obstacles (65 percent). Food import obstacles were also reported as severe, while restrictions by non-state armed groups, travel restrictions within the country, and logistical constraints were rated as less severe (see Annex XI).

64. The affected people surveyed for this evaluation identified different issues as the main problems depending on context. These issues included bad roads, government restrictions, conflict, and corruption. Women and men were equally likely to see bad roads as the largest obstacle, but women more often cited corruption as the second-largest obstacle, whereas men cited conflict/war.

Current Levels of Access

65. **WFP versus partner access:** WFP reliance on partner organizations to deliver food assistance in emergencies means that it is important to distinguish between access for what and access by whom when analysing current levels of access. In a typical emergency response, WFP

del Programa Mundial de Alimentos (2011-2014) - Informe de la Evaluación”; WFP (2016) “Ethiopia Protracted Relief and Recovery Operation 200700 (2015-2018) Food Assistance for Eritrean, South Sudanese, Sudanese and Somali Refugees: An Evaluation of WFP’s Current Operation and Transition Period - Evaluation Report”; WFP (2015) “Protracted Relief and Recovery Operation 200310 (2013-2015) Food Assistance and Education Incentive for Afghan and Iraqi Refugees in the Islamic Republic of Iran - Mid-term Evaluation Report (January 2013–October 2014)”; WFP (2014) “Kenya, PRRO 200174, Food Assistance to Refugees: An Evaluation of WFP’s Operation (2011-2013) - Evaluation Report”; WFP (2014) “Mali, Opération d’Urgence (EMOP) 200525, Assistance Pour Les Populations Affectées par la Crise au Mali: Personnes Déplacées, Familles Hôtes, et Communautés Fragiles (2013-2014) Rapport d’Evaluation”; WFP (2014) “Mozambique, Protracted Relief and Recovery Operation 200355, Assistance to Vulnerable Groups and Disaster-Affected Populations in Mozambique: An Evaluation of WFP’s Operation (2012-2014) - Evaluation Report”; WFP (2016) “Opération Régionale d’urgence (Reg. EMOP) Afrique de l’Ouest 200777 – “Fournir un soutien salvateur aux ménages au Cameroun, au Tchad et au Niger directement affectés par l’insécurité dans le nord du Nigeria” - Rapport d’Evaluation”; WFP (2014) “Pakistan Protracted Relief And Recovery Operation 200250 “Enhancing Food And Nutrition Security and Rebuilding Social Cohesion” January 2013 to August 2014 - Evaluation Report”; WFP (2014) “Philippines, Protracted Relief and Recovery Operation PRRO 200296: Support for Returnees and Other Conflict-Affected Households in Central Mindanao, and National Capacity Development in Disaster Preparedness and Response - 01 May 2012 to 30 April 2014 - Evaluation Report”; WFP (2012) “Somalia: An Evaluation of WFP’s Portfolio”; WFP (2015) “An Evaluation of WFP’s Regional Response to the Syrian Crisis, 2011-2014 - Evaluation Report”; WFP (2017) “Sri Lanka: An evaluation of WFP’s portfolio (2011-2015)”; WFP (2016) “Ukraine EMOP 200765 Emergency Assistance to Civilians Affected by the Conflict in Eastern Ukraine November 2014–December 2015 Final Report”; WFP (2012) “Zimbabwe: An Evaluation of WFP’s Portfolio (2006-2010)”; as well as WFP (2017) “Operation Evaluations Series, Regional Synthesis 2013-2017: West and Central Africa Region”).

⁹⁰ WFP Office of the Inspector General. “Internal Audit of WFP Operations in Egypt (2016)”; “Internal Audit of WFP Operations in South Sudan (2016)”; “Internal Audit of WFP Operations in Syria (2016)”; “Internal Audit of WFP Operations in Yemen (2016)”; “Internal Audit of WFP’s Operations in the Democratic People’s Republic of Korea (2017)”.

⁹¹ Including all current or recent WFP Level 3 emergencies: the Central African Republic, Cameroon, the Democratic Republic of the Congo, the Ebola response, Iraq, Nigeria, South Sudan, Southern Africa, Syria, and Yemen.

⁹² They include: security, political, logistical, and institutional constraints covering active fighting, general insecurity, and targeted attacks on aid workers; United Nations security restrictions; access denials by warring parties; physical obstructions; attempts at directing or manipulating assistance; and economic and political sanctions, as well as WFP capacity and resource limitations.

will conduct an overall assessment of food security needs, arrange the delivery of bulk commodities (often working with commercial providers and/or transport companies to do so), provide logistics services, and monitor the activities of its partners. Only under exceptional circumstances does WFP deliver assistance directly to people in need – for example, through its rapid response teams in South Sudan and Nigeria.

66. **Access for assessing needs** (strong access restrictions and increasing reliance on technological solutions): Confirming the findings of an evaluation relating to needs assessments⁹³, this evaluation found that WFP was generally recognized for its strong capacity to assess needs, including the specific needs of different gender, age, and socio-cultural groups. To strengthen assessments in areas with limited access, WFP has invested in technological solutions, in particular mobile vulnerability analysis and mapping ([mVAM](#)). Despite these efforts, field teams and partners highlighted constraints regarding needs-assessment data as a significant challenge in the majority of operations visited for this evaluation. This included, for example, extrapolations based on limited samples of primary data and outdated census data; host government interference with needs-assessment data; and problems regarding the dissemination, sharing, and mutual triangulation of data.

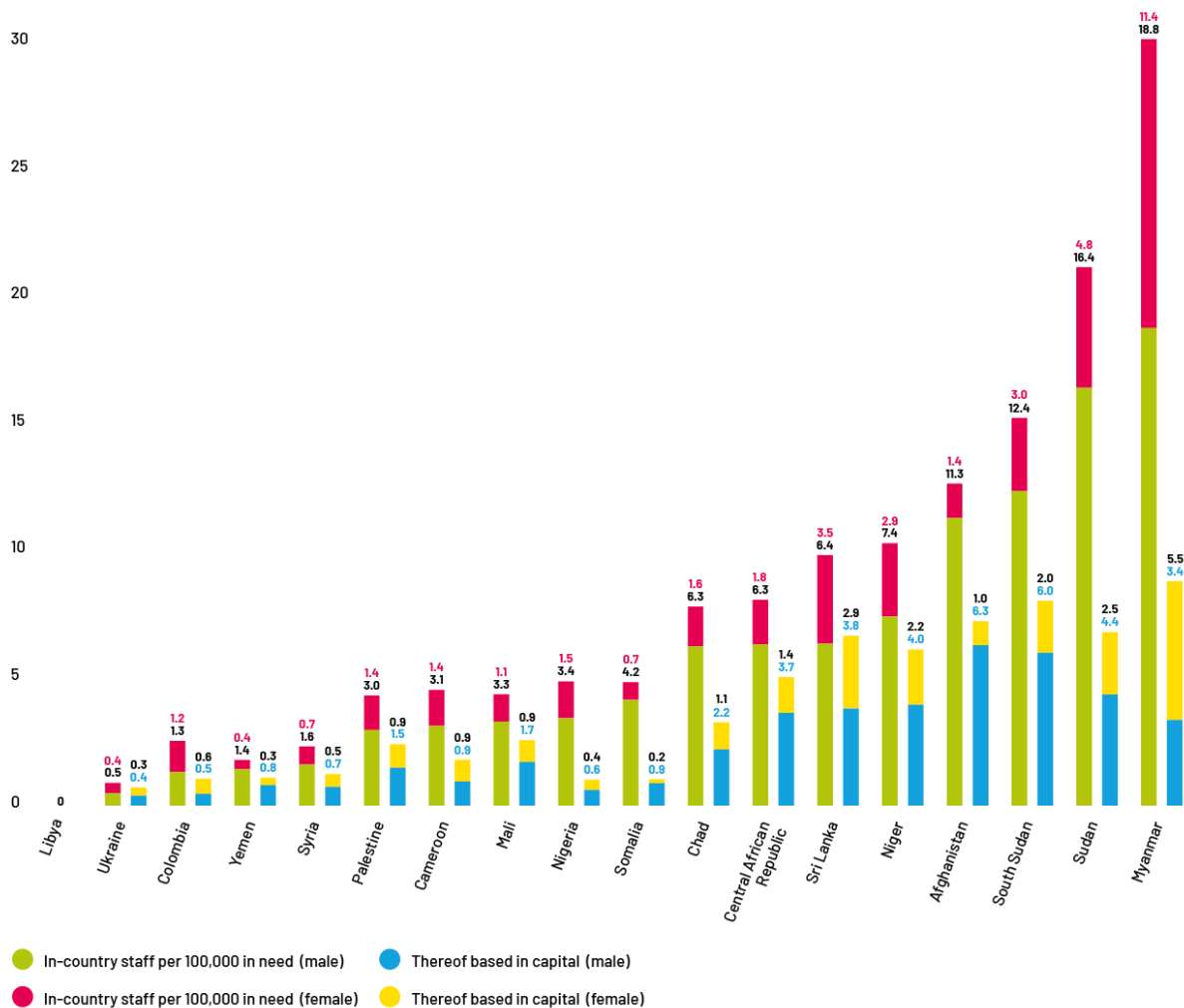
67. **Highly variable presence of WFP staff and strong concentration in capitals:** This evaluation analysed several sets of quantitative data to understand the current level of access of WFP for delivering assistance. A first indication is the presence of staff. In the 18 emergency operations included in the quantitative analysis, WFP had an average of 14 staff members in country per 100,000 people in need during the assessed period, in the third quarter of 2016.⁹⁴ In two thirds of the countries, the majority of staff members were located in the capital. Across all 18 countries, an average of 46 percent of staff was deployed to the capital. It is also striking that, reflecting the various access and security constraints, the WFP staff ratio varies strongly between countries – from no staff present in Libya and two staff members per 100,000 people in need in Yemen, to 34 staff per 100,000 in Myanmar (Figure 7). The evaluation noted a strong, positive relationship between WFP staff presence in the country and its level of coverage of total needs. For each additional staff member per 100,000 people in need, WFP achieved 2 percent more coverage in the period observed (Annex XI). At the same time, the number of staff members located in a province did not have an effect on that province's coverage, illustrating the strong reliance of WFP on partners for delivering assistance to people in need.

Figure 14: Presence of WFP staff in country and in capitals per 100,000 people in need in 2018⁹⁵

⁹³ [WFP \(2007\) 'Evaluation of WFP's Strengthening Emergency Needs Assessment Implementation Plan'](#).

⁹⁴ For this measure, the sum of the recorded people in need at IPC 3–5 for the relevant period in all provinces was used, with the exception of Colombia, Myanmar, Nigeria, Sri Lanka, and Ukraine, where our data only considered sub-regions of each country. For these countries, the Humanitarian Response Plan's needs estimates were used in order not to distort the in-country workforce statistics.

⁹⁵ Needs data from Humanitarian Response Plans for 2018. Staff data provided by WFP for 2018.



68. **Dependence on partners for access:** Since WFP usually delivers through partners, interviewees highlighted the availability of cooperating partners as a key factor determining access. Twenty countries covering 261 provinces submitted data on this issue. The data indicated that finding partners was “not a problem” in 67 percent of the provinces, “somewhat difficult” in 20 percent, and “very challenging/impossible” in 12 percent. The regression analysis found a strong correlation between the availability of partners and coverage: for every point increase in the “lack of cooperating partners,” WFP achieved 8 percent less coverage in the provinces included in the quantitative analysis (Annex XI).

69. **Significant levels of coverage in emergencies, especially in difficult operating environments:** The most important indicator for access is the level of coverage of food security needs that WFP and its partners ultimately achieve. Available data show that WFP assists a significant share of people in need in emergencies and that it performs particularly well in very difficult operating environments. Thus for example:

- Based on annual reporting for 2016, WFP assisted 40 percent of people in need in the 18 countries identified as experiencing access challenges that were fully included in the quantitative analysis, compared to just over 10 percent globally.⁹⁶ On average, a slight majority of 53 percent of beneficiaries were women. The annual data do not indicate

⁹⁶ Based on food security needs data as reported in the Humanitarian Response Plan and WFP beneficiary numbers of food distribution reported in WFP’s Standard Project Reports. This data was not available for the Central African Republic and Sri Lanka. At the global level, WFP reported assisting 82.2 million out of 795 million people who were hungry in 2016. [WFP. WFP Year in Review 2016. 2017.](#)

whether people were assisted regularly or not. It is therefore also interesting to consider the snapshot data, referring only to the third quarter of 2016, that WFP country offices submitted to the evaluation. Here, WFP assisted a total of 32 percent of all people in integrated phase classification (IPC) food security phases 3 or above, with food deliveries across the 266 provinces in 18 countries for which complete data were submitted (that is, excluding provinces for which no needs data were available, either because there were no needs or because access to these provinces was not possible). This share is the same in provinces with particularly high needs – with more than 200,000 individuals in need – despite the fact that delivering on such a high scale is more difficult. This suggests that WFP makes particular efforts to reach areas with access challenges and with particularly high needs.

- Coverage is higher in highly insecure areas and in areas with difficult logistical conditions. Contrary to expectations, high levels of insecurity, as evidenced by high UNDSS security ratings, have a statistically significant, positive effect on coverage. The regression on the data submitted by WFP country offices finds that for each level of increase in insecurity, WFP and its partners reached 6 percent more of the people in need in a province. Similarly, difficult logistics conditions, as indicated by WFP country staff, also have a positive effect on coverage. For each level of increase in logistical difficulty, WFP and its partners reached 4 percent more people in need in a province.

70. Another unexpected finding of the regression analysis is that there were factors that were found not to have any statistically significant effect on coverage. Those factors include: whether an integrated United Nations peacekeeping mission is present; who controls a given territory (government or opposition); whether organizations listed as terrorist⁹⁷ are present; how active other humanitarian organizations are in providing food assistance; the level of travel restrictions and restrictions by non-state armed groups; and how much funding WFP had at its disposal per person in need (Annex XI). An operation being designated as a level 3 emergency (the highest priority) did not influence whether WFP and its partners had access to, and could deliver in, a given area. However, once they had access, level 3 status was found to strongly affect the level of coverage provided.

71. **Remaining coverage gaps:** Congruent with these findings, many interviewees emphasized that the scale of assistance provided by WFP and its partners was very important. They saw it as a key asset for access negotiations and as crucial from the point of view of the principle of humanity (see paragraph 76). However, even if assistance happens on a comparatively large scale, important gaps remain. Even among individuals who received WFP assistance (those participating in the affected people survey), a significant minority is concerned about coverage gaps. Twenty nine percent of survey respondents think WFP is not providing enough aid to meet people's food needs. Thirty five percent of stakeholders interviewed for this evaluation stated that there was no access to significant areas with high needs in their country of operation, and 47 percent (58 percent among WFP staff) mentioned at least certain pockets that WFP and its partners were not reaching. Twenty out of 22 evaluations of WFP emergency operations mention gaps in efforts to reach people in remote or difficult-to-access areas.⁹⁸

72. **Important logistical support for other humanitarian organizations:** The strong logistics capacity of WFP not only forms the backdrop for its own operations, but also plays a critical role in enabling access for other organizations. The logistics cluster and UNHAS, both led by WFP, provide essential logistics services where these are not otherwise readily available. This includes [passenger flights](#) for humanitarian workers as well as cargo transportation, processing,

⁹⁷ For the purposes of analysis, this evaluation used the United States State Department List of Foreign Terrorists as a reference, while recognizing that WFP as a United Nations agency does not abide by national lists.

⁹⁸ See footnote 89.

and storage, covering a total of 87,239 metric tons of relief items in 2016.⁹⁹ Echoing the results of an [earlier evaluation](#), stakeholders provided almost exclusively positive feedback on these services (93 percent of interviewees held positive views). They particularly appreciated the pragmatic and often innovative solutions offered to complex problems and felt that WFP as logistics cluster lead had become more service oriented in recent years. They expressed some criticism about decision-making procedures that some felt were not adequately transparent and inclusive and failed to prioritize NGO requests. They also suggested that the cluster could be more active in supporting local NGOs – for example, by announcing available services in local languages.

73. Regarding the coordination and cooperation of access approaches and negotiations with other humanitarian organizations, the findings of this evaluation are mixed. The approach of WFP differed widely between different contexts, depending – among other factors – on the individuals managing the country operation. Examples collected range from an active WFP role in developing and applying joint positions on access, and under certain circumstances also negotiating access on behalf of others, to disregarding the concerns of other humanitarian organizations or even ignoring jointly agreed rules.

74. **Access for monitoring** (important gaps and increasing reliance on third-party monitoring): The evaluation team identified the fact that insufficient field presence for monitoring was a problem for WFP in almost all the contexts visited for this evaluation. The capacity of WFP to monitor the activities of its partners directly is particularly limited in areas with significant levels of insecurity and with high UNDSS security levels that restrict the movement of WFP staff, as well as in countries where staff concentrated in the national capital. In many complex emergencies, therefore, WFP increasingly relies on technological solutions and third-party monitoring, but still faces many operational problems with the latter practice. Interviewees in several contexts highlighted the fact that third-party monitors often lack information about WFP activities or technical knowledge, for example in nutrition, which is necessary for effective monitoring. They also reinforced one finding from an earlier [audit](#) – it can be difficult to triangulate information provided by third-party monitors and therefore to monitor the monitors. In addition, the data collected by third-party monitors focus heavily on the quantitative aspects of programming and less on questions related to the humanitarian principles. One exception is Mali, where third-party monitors also track indicators related to the quality of food, complaints, issues with the distribution sites, and questions related to impartiality and targeting. Eight out of 22 evaluations and 9 out of 15 country-specific internal WFP audits identified gaps and incoherence in monitoring.¹⁰⁰ Among interviewees, 56 percent of WFP staff members and 68 percent of external stakeholders were critical of WFP monitoring practices, and investing in WFP direct field

⁹⁹ [Logistics Cluster. Year in Review 2016. 2017.](#)

¹⁰⁰ Critical remarks were included in the following evaluations: WFP (2012) “Afghanistan: An Evaluation of WFP’s Portfolio”; WFP (2016) “Ethiopia Protracted Relief and Recovery Operation 200700 (2015-2018) Food Assistance for Eritrean, South Sudanese, Sudanese and Somali Refugees: An Evaluation of WFP’s Current Operation and Transition Period”; WFP (2014) “Mali, Opération D’urgence (Emop) 200525, «Assistance Pour Les Populations Affectées Par La Crise Au Mali: Personnes Déplacées, Familles Hôtes, Et Communautés Fragiles» (2013-2014); WFP (2014) “Mozambique, Protracted Relief and Recovery Operation 200355, Assistance to Vulnerable Groups and Disaster-Affected Populations in Mozambique: An Evaluation of WFP’s Operation (2012-2014)”; WFP (2016) “Opération Régionale d’urgence (Reg. EMOP) Afrique de l’Ouest 200777 - “Fournir un soutien salvateur aux ménages au Cameroun, au Tchad et au Niger directement affectés par l’insécurité dans le nord du Nigeria”; WFP (2014) “Pakistan Protracted Relief And Recovery Operation 200250 “Enhancing Food And Nutrition Security and Rebuilding Social Cohesion” January 2013 to August 2014”; WFP (2013) “Sudan: An Evaluation of WFP’s Portfolio 2010–2012”; and WFP (2012) “Zimbabwe: An Evaluation of WFP’s Portfolio (2006-2010)”, and internal audits by the WFP Office of the Inspector General: WFP (2017) “Internal Audit of WFP’s Operations in Bangladesh”; WFP (2017) “Internal Audit of WFP’s Operations in the Democratic People’s Republic of Korea”; WFP (2016) “Internal Audit of WFP’s Operations in Egypt”; WFP (2017) “Joint Internal Audit of the Management of CERF-Funded Activities in Ethiopia”; WFP (2017) “Internal Audit of WFP’s Operations in Jordan”; WFP (2017) “Internal Audit of WFP’s Operations in Mozambique”; WFP (2016) “Internal Audit of WFP’s Operations in South Sudan”; WFP (2016) “Internal Audit of WFP’s Operations in Syria”; and WFP (2016) “Internal Audit of WFP’s Operations in Yemen”.

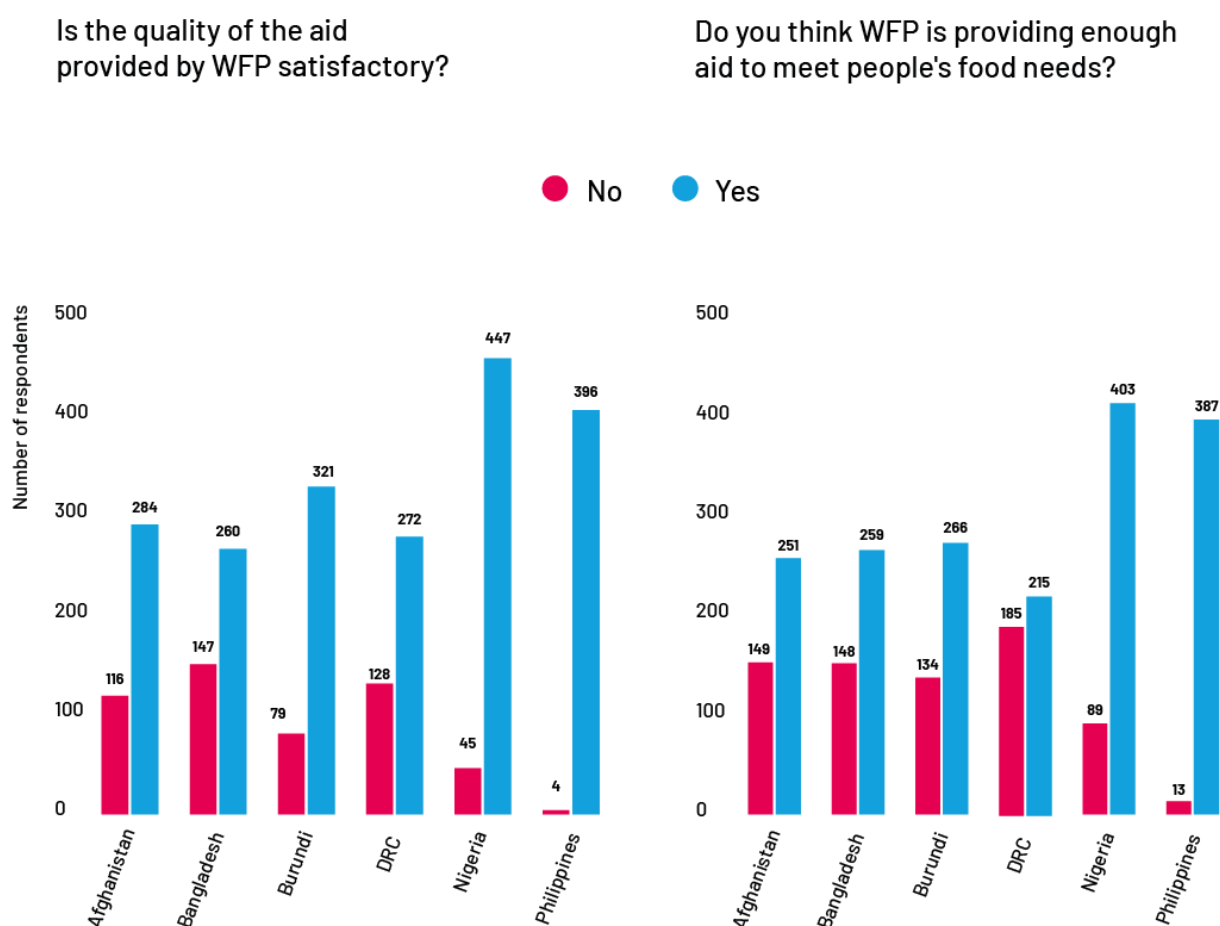
monitoring capacity is one of the most frequent suggestions and recommendations made by interviewees.

Humanitarian Principles

75. Progress on the humanitarian principles was found to be uneven. Performance against each principle is set out in the following paragraphs.

76. **Strong performance on humanity:** As discussed above, WFP – primarily through its partners – provides food assistance on a significant scale in difficult contexts. In general, both the nature of the assistance delivered and its scale are highly appreciated. As a result, WFP enjoys a very positive reputation among affected populations, partners, and staff. All the data collection instruments used in this evaluation supported this finding. Three observations were made. First, the majority of affected people surveyed were satisfied with both the quantity and the quality of the aid delivered. This is important even if the data are likely to include a positive bias, as only people who had received assistance from WFP or directly knew somebody who had could participate in the survey. There were no significant differences between the responses of women and men. Respondents in the Philippines and in Nigeria were most satisfied on both counts, whereas respondents in the DRC were least satisfied (Figure 8).

Figure 15: Results of affected populations surveys on quantity and quality of aid delivered

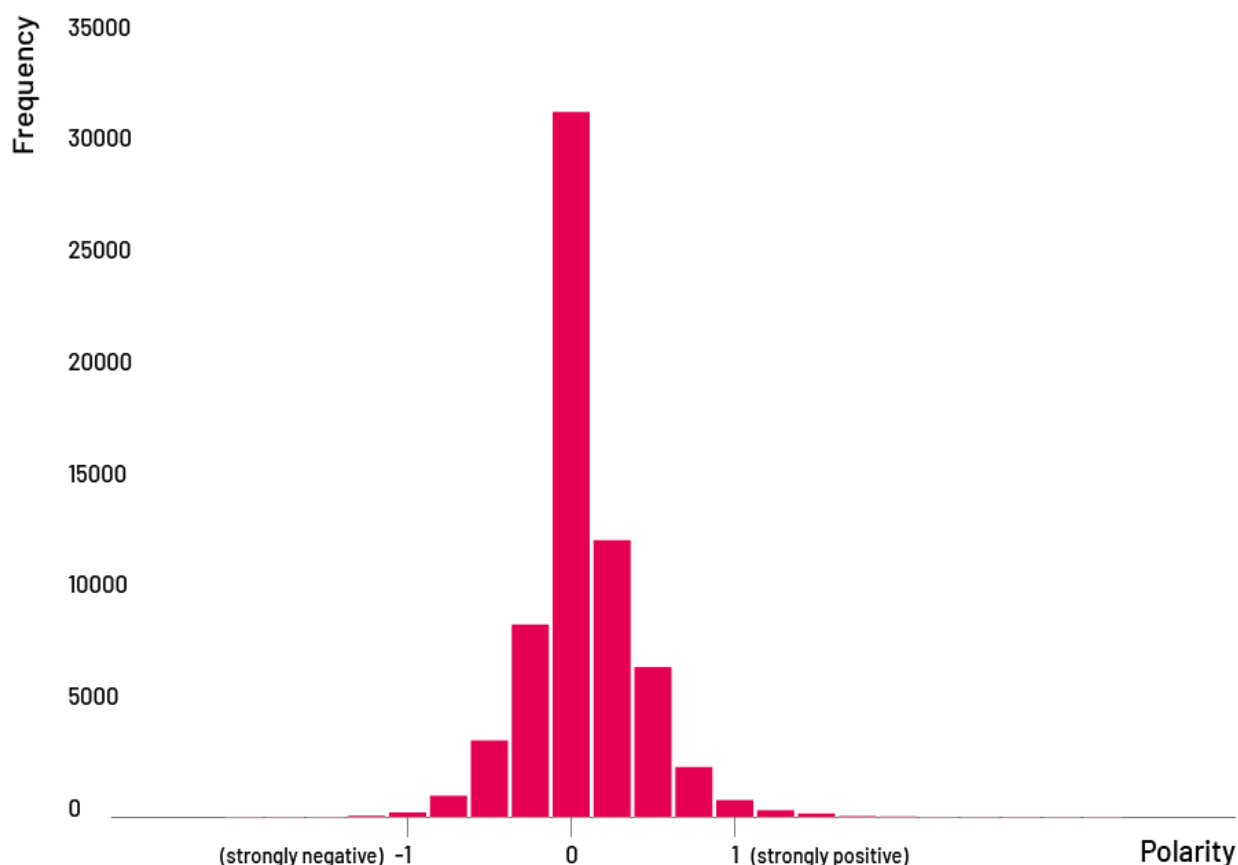


77. The second observation was that the media and social media echo of WFP operations was largely positive. A plurality of words used in tweets directed @WFP were neutral, and more tweets included words with positive (values >0) than with negative associations (values <0, Figure 9). Moreover, negative tweets were often about the crisis situation rather than about WFP assistance.¹⁰¹ A media analysis conducted by CARMA for the third and fourth quarters of 2016 came to similar conclusions and detected a “strongly positive tone,”¹⁰² with an average favourability rating of 66 (out of 100) in both cases.

¹⁰¹ An analysis of a random sample of 200 negative and 200 positive tweets showed that 18 percent of negative tweets – compared to 43 percent of positive tweets – were directed at WFP.

¹⁰² CARMA International. *World Food Programme Third Quarter 2016 Report*. Washington, D.C.: CARMA International, 2016; and CARMA International. *World Food Programme Fourth Quarter 2016 Report*. Washington, D.C.: CARMA International, 2016.

Figure 16: Results of Twitter analysis on sentiment of tweets directed @WFP from 2013 to 2017



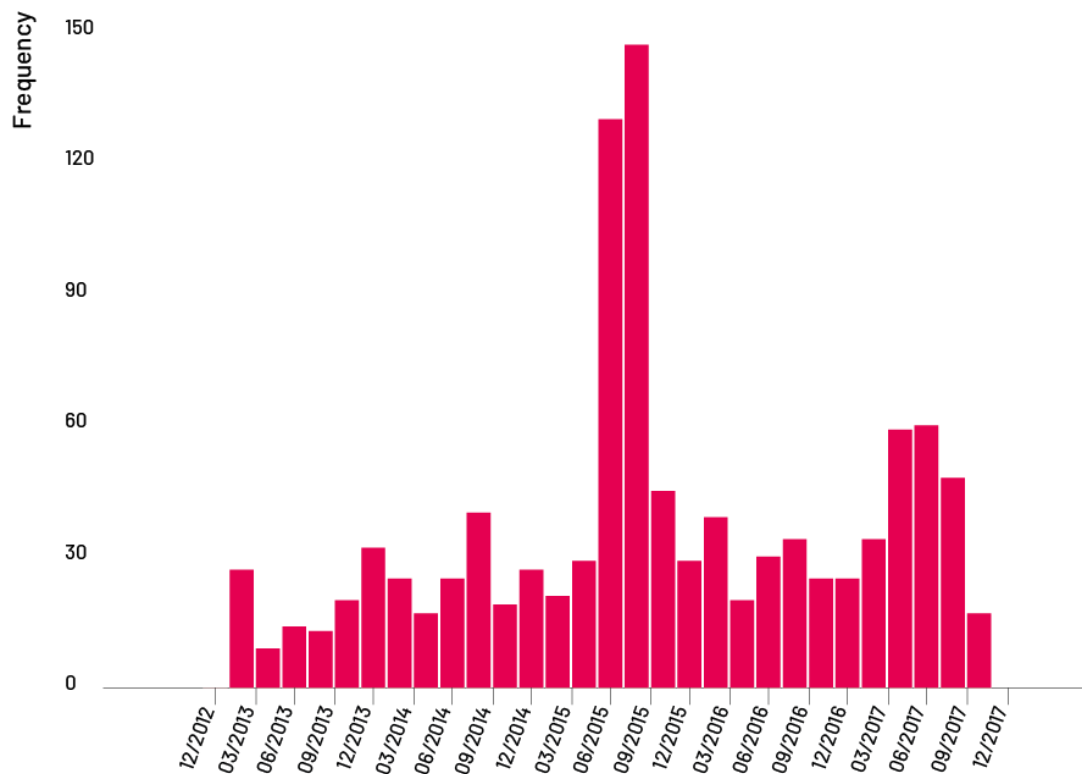
78. The third observation made was that WFP staff members and partners participating in the survey gave humanity the highest rating of all the principles. A total of 90.1 percent of WFP staff feel that WFP “always” or “usually” designs and delivers assistance in a way that respects the dignity of affected people. Among external respondents, 70.8 percent are of the same opinion.

79. **Frequent quality problems:** Within this largely positive picture, quality issues consistently emerged as the most important limitation. Quality issues with food distributions were raised in all the operations visited for this evaluation. These included, for example: delays, the distribution of incomplete baskets, inappropriate types of food, a lack of food diversity, low quality food, and expired or rotten food. Partners usually raised these concerns most forcefully, but staff members also acknowledged them. Quality issues were identified as medium-risk or high-risk in 4 out of 15 country-specific internal audits conducted in 2016 and 2017,¹⁰³ as well as in standard project reports from two countries. Among aid recipients, 21 percent did not believe the quality of the assistance provided by WFP was satisfactory (Figure 8). Social media messages were also found to include complaints about expired, rotten, or spoiled food on a relatively regular basis (Figure 10).¹⁰⁴ Similar quality issues were not raised regarding cash based transfers.

¹⁰³ The critical audits by the WFP Office of the Inspector General: WFP (2017) “Internal Audit of WFP’s Operations in Mozambique”; WFP (2017) “Internal Audit of WFP’s Operations in the Democratic People’s Republic of Korea”; WFP (2016) “Internal Audit of WFP’s Operations in Syria”; and WFP (2017) “Internal Audit of Food Quality and Safety in the WFP Jordan and Lebanon Operations”.

¹⁰⁴ The tweets concern five different operations: Somalia, Yemen, Nepal, Iraq, and Pakistan. Somalia has faced the strongest social media criticism, with concerns occurring repeatedly over four of the five years covered by the analysis. The spike in June 2015 represents social media complaints relating to the operation in Nepal.

Figure 17: Distribution of tweets containing the words “expire,” “rot,” or “spoil” (2013-2017)



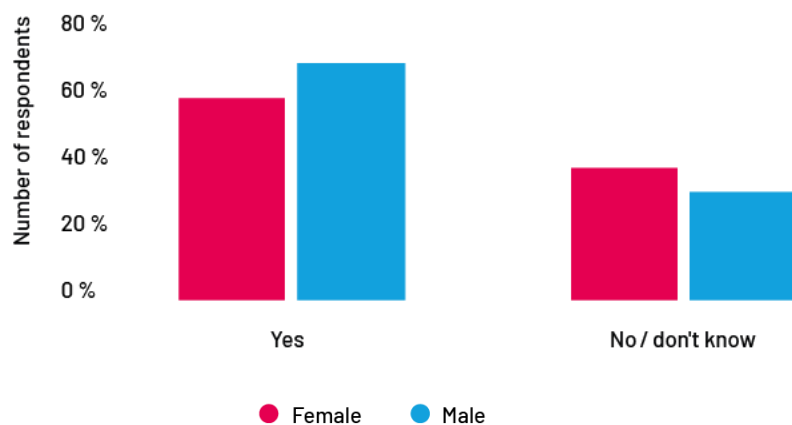
80. **Quantity is prioritized over quality:** Many interviewees linked these recurring problems with quality to WFP prioritizing quantity over quality. Cooperating partners, for example, frequently criticized WFP for its reluctance to pay for qualitative aspects of their programming. Staff members explained the organizational incentives behind this practice: performance is measured in terms of the number of people reached and the volume of food distributed, rather than the quality of the assistance. When there is a direct trade-off between quantity and quality, aid recipient perceptions seem to support WFP prioritization, as they are more concerned about the quantity of aid provided (which was seen as insufficient by 29 percent of survey respondents) than with quality (not seen as satisfactory by 21 percent). In some situations, however, there is no such trade-off, but quality issues also make the assistance less effective. For example, when food is rotten or spoiled.

81. **Problems with planning and communication with partners:** Partners also linked quality issues – particularly disappointed community expectations due to delays and irregular distribution – to the WFP planning and communication processes with partners. According to its partners, WFP uses planning figures as the basis for its agreements with partners without adjusting for potential problems and delays. Partners communicate these figures and frequencies to communities and enrol a corresponding number of beneficiaries. When problems occur, figures and times have to be adjusted downward, and expectations are not met. This is all the more problematic since partners in several contexts felt that WFP does not actively communicate the obstacles and problems it faces, making it difficult for partners to adjust. They therefore recommend using more conservative scenarios for communicating programmes to communities and enrolling beneficiaries, adjusting the figures upward if and when possible.

82. **Further scope for improvement in feedback, complaints, and information mechanisms:** Community information, feedback, and complaints systems – often subsumed under accountability to affected populations (AAP) – are crucial for tracking and potentially improving the quality of aid. They also signal respect for the dignity of people in need and are

therefore a direct requirement of the principle of humanity. Where cooperating partners deliver assistance to people in need, they also have the main responsibility for accountability to affected populations. WFP has been setting up an increasing number of hotlines and call centres to maintain a direct line of communication with aid recipients. Eighteen of 22 countries report setting up some form of feedback mechanism in their 2016 standard project reports. In the surveys conducted for this evaluation, affected people rate these systems positively. Of those responding to the survey, 66 percent of men and 61 percent of women reported that community members were able to give their opinions on the WFP programme, make complaints, and suggest changes (Figure 11). This is very positive compared to earlier surveys, which consistently reported low levels of consultation,¹⁰⁵ even when taking into account the fact that all the survey respondents own mobile phones and are therefore very likely to reflect a positive selection bias. The difference in the responses of men and women might suggest that more effort should be made to integrate gender into WFP and partner outreach to affected communities.

Figure 18: Survey responses of affected populations to: “Were community members able to give their opinion on WFP programmes, make complaints, and suggest changes?”



83. Nevertheless, there are several indications that accountability to affected populations still requires further investment and improvement:

- Current partner practices regarding accountability to affected populations vary significantly. Six out of 25 internal audits contained high-risk or medium-risk observations related to it.¹⁰⁶
- There are overlaps and duplications between the accountability to affected population mechanisms of different actors in the current set-up. WFP and its partners often maintain hotlines and/or call centres for the same communities, and there are even cases in which WFP itself operates multiple lines. This reduces the cost-effectiveness of accountability to affected population mechanisms and makes it more difficult for communities to use these systems.
- Phone-based feedback and complaints systems have inherent limitations. Although practices differ, communities usually do not use them to bring up sensitive issues; they usually enable more men than women to provide feedback; and they often fail to consider

¹⁰⁵ For example, the [SAVE research programme](#) and [The State of the Humanitarian System Report](#).

¹⁰⁶ Including audits by the WFP Office of the Inspector General: WFP (2017) “Joint Internal Audit of the Management of CERF-Funded Activities in Ethiopia”; WFP (2016) “Internal Audit of WFP’s Operations in Yemen”; WFP (2017) “Internal Audit of Beneficiary Management”; WFP (2017) “Internal Audit of the Operationalization of WFP’s Enterprise Risk Management”; WFP (2017) “Internal Audit of WFP’s CBT Retailer Implementation in Jordan and Lebanon”; and WFP (2016) “Internal Audit of Third Party Monitoring in WFP”.

local language issues, although language issues were notably changing in a number of WFP operations.¹⁰⁷

- A recent survey conducted by WFP indicates important shortcomings in current accountability to affected population systems,¹⁰⁸ and a relatively large number of interviewees in this evaluation suggest that these systems should be a priority for further institutional investment.
- There are gaps in the systematic analysis and use of beneficiary feedback data. The majority of countries from which the evaluation team requested beneficiary feedback for this evaluation either submitted no data at all or submitted only short summary statistics of complaints, but no meaningful analysis of the content of feedback (except for the Philippines); its breakdown by gender, age, or other relevant category; or its potential implications for WFP.¹⁰⁹

The Principle of Impartiality

84. **Good understanding of impartiality:** Staff and partners have a clear understanding of what impartiality entails and demonstrate a high level of buy-in to the principle. Interviewees most consistently mentioned the requirement “to distribute aid according to need and without discrimination” when explaining what humanitarian principles WFP follows. Impartiality is the principle included in the most explicit and detailed way in field-level agreements with partners. Representatives of governments or de facto authorities interviewed for this evaluation also demonstrated a good understanding of this principle. Linked to the emphasis on the WFP gender policy, many interviewees referred to gender when discussing impartiality. For example, they mentioned the need to prioritize pregnant and lactating women as well as households headed by women because of their specific needs.

85. Affected people view WFP as impartial, although there are differences between countries. Sixty nine percent of the affected people surveyed for this evaluation find that WFP provides its assistance impartially, without favouritism, based on need alone. However, there is a significant difference between countries. WFP is seen as most impartial in Burundi (84 percent) and Afghanistan (81 percent), whereas only a slight majority of 57 percent finds WFP impartial in the DRC and Syria (Figure 12).

86. **No evidence of deliberate discrimination:** None of the data collection or analysis tools used in the evaluation provides evidence that WFP has or would deliberately discriminate against any groups or types of individuals. In interviews, neither staff (including former staff), nor cooperating partners, nor organizations that do not work directly with WFP mentioned any examples of deliberate discrimination. The issue did not emerge in the media and social media analysis, and it was not raised in any of the surveys. Across the 18 countries included in the quantitative analysis, WFP reports a slight majority (53 percent) of women aid recipients.¹¹⁰

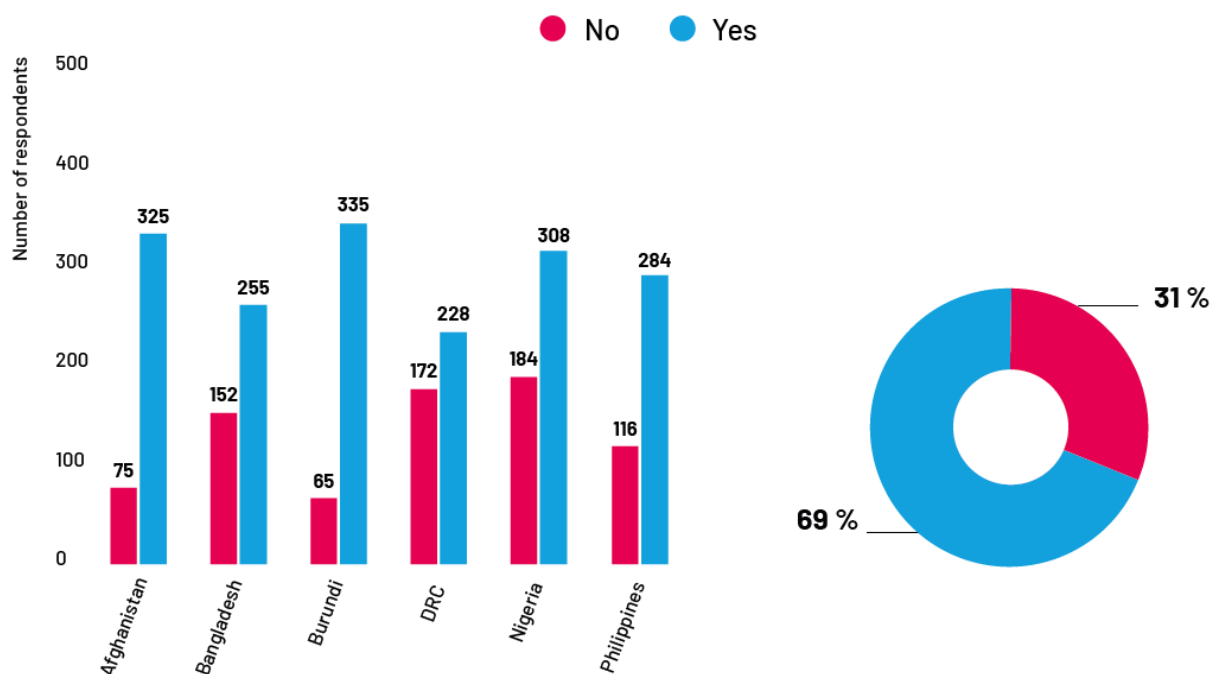
Figure 19: Survey responses of affected populations to: “Do you believe WFP provides aid impartially, without favouritism, based on need alone?”

¹⁰⁷ Dette, Rachel, Julia Steets, and Elias Sagmeister. *Technologies for Monitoring in Insecure Environments*. Berlin: GPPI, 2016.

¹⁰⁸ The recent survey conducted by the SCOPE team, referenced in the protection policy evaluation. Yemen reports hiring a Somali-speaking hotline coordinator after identifying language as a barrier to Somali refugees (standard project report).

¹⁰⁹ Iraq, Libya, Mali, Pakistan, South Sudan, Syria, and Ukraine provided no data. Cameroon, Colombia, Niger, Nigeria, Palestine, Sri Lanka, Sudan, and Yemen provided short, mainly statistical summaries of how many feedback messages had been received.

¹¹⁰ Data source: WFP standard project reports.

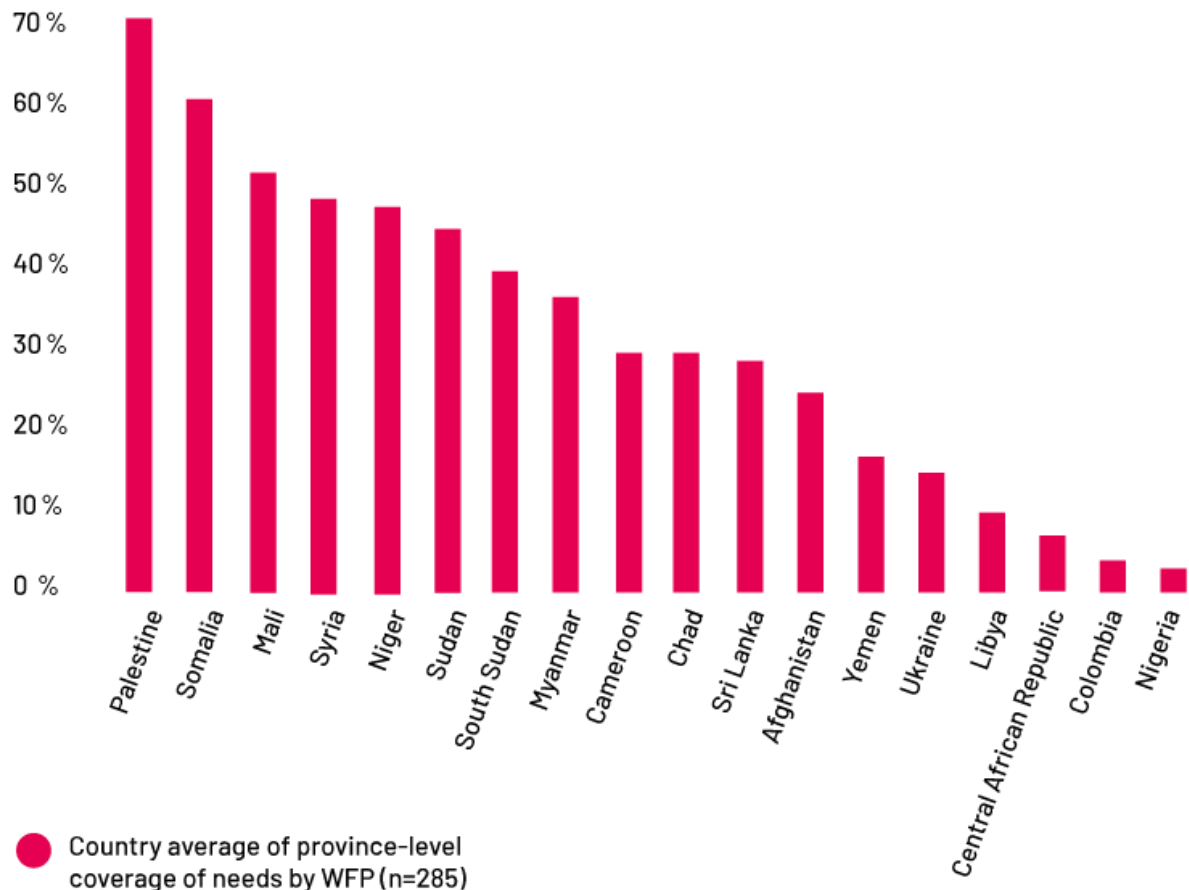


87. **Uneven geographic coverage of needs:** Non-discrimination, however, is only one side of impartiality. The principle also requires that assistance be provided based on, and according to, need. An impartial organization with a global mandate for food assistance and the role of provider of last resort as a global food security cluster co-lead can therefore be expected to seek as much as possible to provide a similar level of assistance in relation to existing food needs. Many external factors – from available funding to access restrictions – affect the ability of WFP to provide balanced coverage. Available evidence suggests that WFP coverage of existing needs is highly uneven, both on a global level and within many countries. This suggests that WFP could do more to actively address, mitigate, or counter-balance the factors leading to uneven coverage. Actions could include, for example: tracking coverage patterns more actively; allocating flexible resources strategically to under-covered areas; advocating more intensively with donors for flexible resources or for re-allocating resources to under-covered areas; focusing the WFP fundraising strategy on other types of donors that provide more flexible resources; and engaging more actively with other food security organizations to ensure they focus on existing coverage gaps.

88. **Uneven coverage at the global level:** Data on global coverage of needs is surprisingly difficult to come by. The available data sources have different limitations (see section 1.1). However, they all suggest that global coverage is highly uneven:

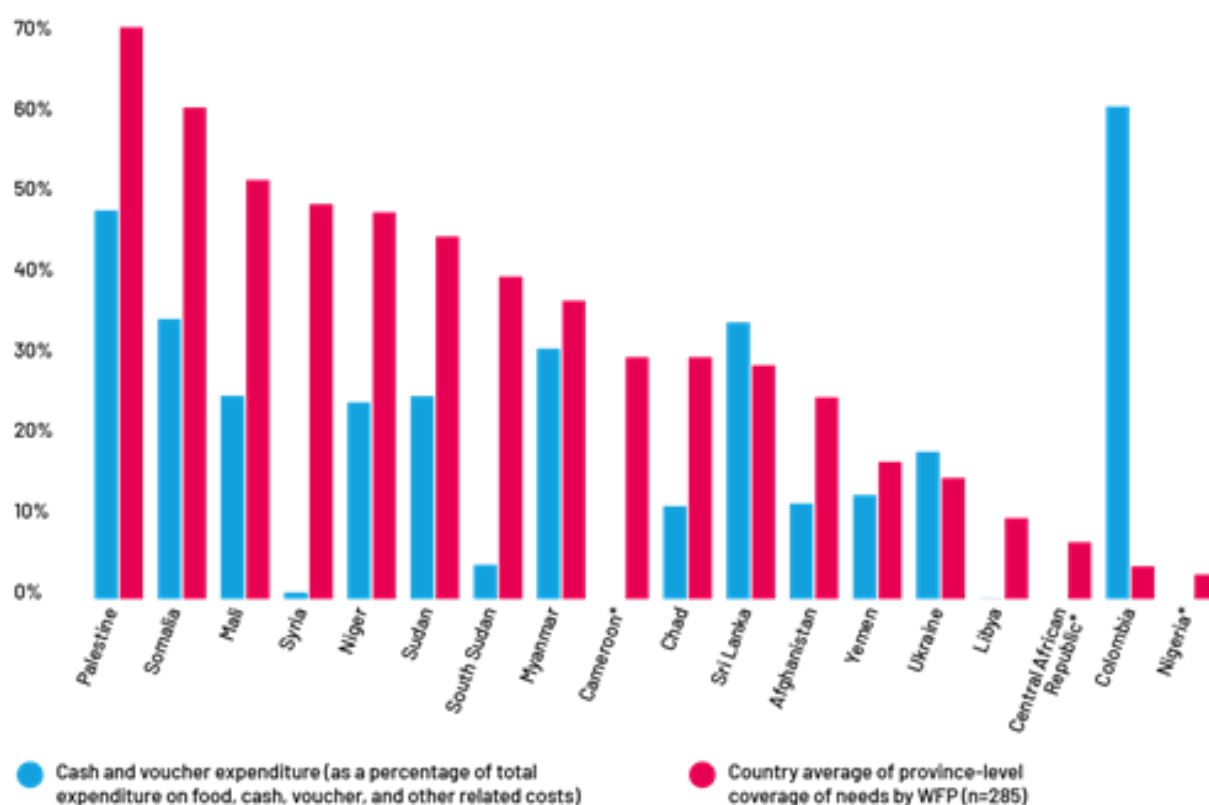
- The data provided by 18 WFP country offices for this evaluation focused on food distribution and captured a snapshot of the third quarter of 2016 at province level. When using these figures to calculate what share of emergency food needs were covered with food distributions during that period on average across a country's provinces, the data showed wide variation, from 71 percent of all needs in Palestine and 62 percent in Somalia at the top of the range to 3 percent in Nigeria, 4 percent in Colombia, and 7 percent in the Central African Republic (Figure 13).

Figure 20: Average coverage of needs per country by WFP with food in QIII 2016, as reported through the data request to country offices



- The unevenness persists when WFP cash based programmes are also considered. Thus, several countries with high levels of food distributions (for example, Palestine, Somalia and Mali - the exception being Syria) have comparatively high proportions of expenditure on cash as well, whereas several countries with low levels of coverage through food distributions also have lower shares of their total budget expenditure on cash (for example, Libya, Ukraine, Yemen and Afghanistan - the exception being Columbia, Figure 14).

Figure 21: Average coverage with food and share of cash programmes¹¹¹



* No data for cash and voucher expenditure

- While WFP has the global mandate for food assistance and is the provider of last resort, it is of course not alone in addressing food needs. The evaluation team assessed three different indicators for the level of assistance provided by other organizations to understand whether this would reduce the unevenness in the global coverage of emergency food needs: the share of funding for food-security related activities received by WFP as compared to other organizations as reported through the [Financial Tracking Service](#); the share of beneficiaries reached by WFP as compared to other organizations as reported by the [Global Food Security Cluster](#); and estimates of the level of activity of other organizations provided by WFP country offices as part of the data request for this evaluation. All three indicators suggest that there are relatively high levels of activity of other food security organizations, both for countries with high coverage of needs by WFP and for countries with very low coverage of needs by WFP. The available data therefore suggests that assistance provided by other organizations does not balance the unevenness of the global needs coverage of WFP.

89. Little strategic use of multilateral funding to correct global coverage imbalances:

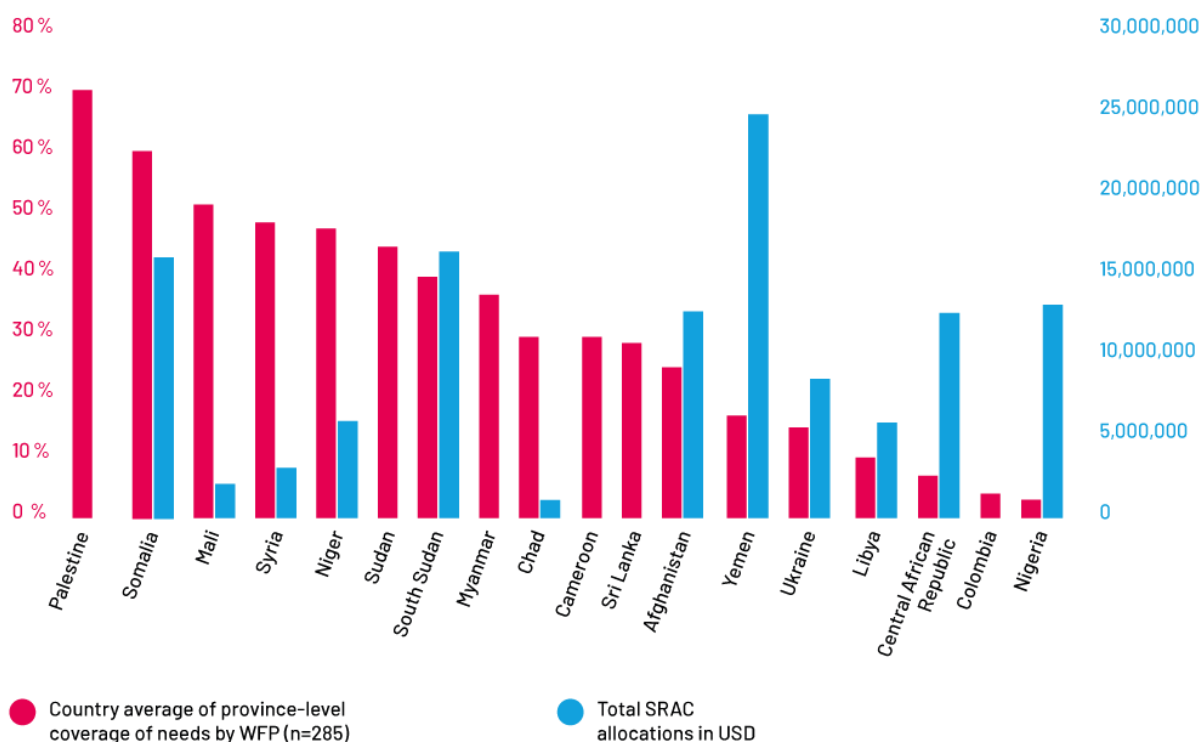
WFP is a United Nations agency that has no core budget and relies on voluntary contributions. Most of these contributions are earmarked for a specific operation. Nevertheless, WFP has a certain amount of flexible funding at its disposal, which is allocated by the Strategic Resource Allocation Committee (SRAC) based on a set of criteria, including the projected level of food insecurity.¹¹² In 2016, 93 percent of country- and region-specific SRAC allocations went to emergency operations. This indicates that WFP prioritizes humanitarian needs over development priorities. At the same time, however, SRAC allocations are not always used strategically to balance

¹¹¹ Data sources: Data request (for average coverage with food), WFP standard project reports for 2016 (for share of cash programmes)

¹¹² WFP. *Project Prioritization and Resource Allocation Process*. 2017.

differences in coverage levels. Somalia received the third highest SRAC allocation in 2016, despite reaching the second highest coverage of needs. At the same time, Colombia, for example, received no SRAC allocation, despite having the second lowest coverage level (Figure 15).

Figure 22: Average coverage of needs with food (Q III 2016) and Strategic Resource Allocation Committee allocations in 2016¹¹³

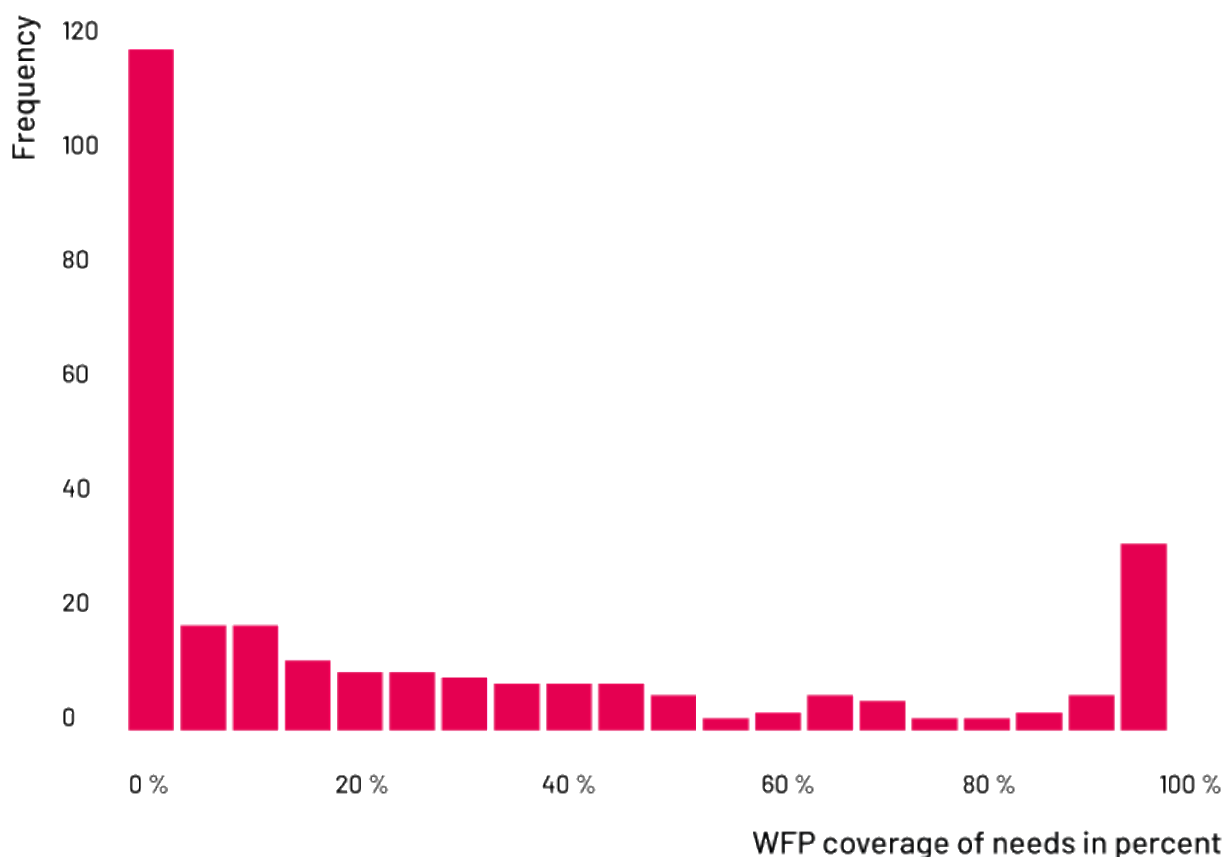


90. **Uneven coverage within countries:** Getting reliable data on needs and coverage at the sub-national level is even harder than at the global level. Again, the available data have limitations, but their limitations are different, which enables triangulation. The following data points suggest that coverage of total emergency food security needs is also highly uneven within countries:

- At province level, the extremes of the spectrum (no coverage at all or full coverage of all emergency food needs) occur most frequently, indicating unevenness (Figure 16). Various factors can potentially explain zero coverage, including, for example: a lack of access to the province in question; the absence of emergency food security needs; the presence of other food security actors; or special seasonal conditions.

¹¹³ Data sources: Data request (for average coverage), WFP report on allocations made by the Strategic Resource Allocation Committee in 2016.

Figure 23: Histogram of WFP coverage with food by province in Q III of 2016 as reported through data request

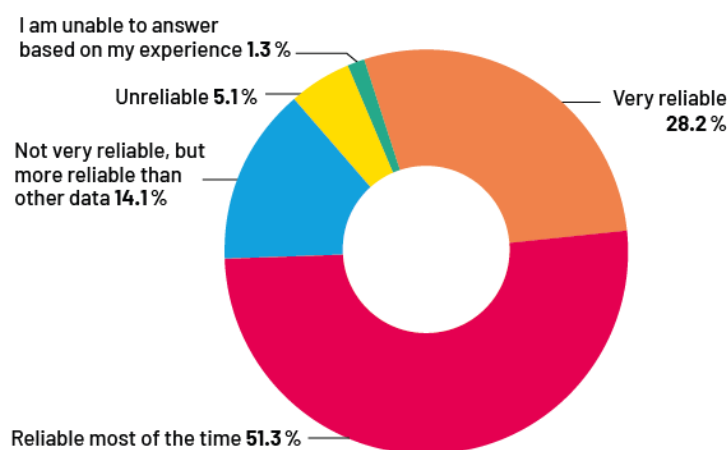


- Coverage levels between provinces remain highly uneven when the activities of other organizations are considered. Detailed data at the district level for 2017 was provided by the Global Food Security Cluster for Somalia, South Sudan, and Nigeria. The average monthly coverage of identified needs per district varies strongly in all three countries. The evaluation team classified provinces into five categories, from severely undercovered (receiving 0 to 9 percent coverage of identified needs) to extremely well covered (receiving 100 percent or more coverage of identified needs). Both extremes occurred almost as frequently as the moderate categories, with 19 percent of districts classified as severely undercovered, 13 percent as extremely well covered and the remaining 68 percent of provinces classified in one of the moderate categories (undercovered, moderate coverage or good coverage). Each of the three countries includes the entire range of possible categories, from severely undercovered to extremely well covered.

91. **Strong data but insufficient strategic use of data:** An impartial response is based on a good analysis of needs. Over the years, WFP has invested heavily in needs data that are comparable and disaggregated by sex and age. The services of its vulnerability analysis and mapping ([VAM](#)) unit, for example, are recognized and highly appreciated. The practice of using standardized approaches for food security assessments – the Integrated Food Security Phase Classification ([IPC](#)) and Food Security and Nutrition Analyses (FSNA) – lends additional credibility to the data and allows for comparison between countries. Sector-wide food security assessments such as those included in humanitarian response plans now routinely include data disaggregated by sex and age. Partners rate the needs data of WFP very positively. A total of 28.2 percent of survey respondents find the needs data of WFP very reliable, and 51.3 percent find them reliable most of the time (Figure 17). For most countries, the WFP [Year in Review 2016](#) reports needs data

that are similar to those recorded in IPC phases 2 and higher or 3 and higher by the Food Security Information Network (FSIN).¹¹⁴ The notable exception is Iraq, a middle-income country in which it is reported that humanitarian organizations face political pressure from donors to provide aid during counter-terrorism campaigns. Here, WFP reported 10 million in need for 2016. This corresponds to the figure provided by [OCHA](#) in November 2015 as the anticipated overall number of people in need for 2016, rather than the 2.4 million in IPC phases 2 and above or the 1.5 million in phases 3 and above that are reported through FSIN, based on WFP data.

Figure 24: Partner survey responses on reliability of WFP data on humanitarian needs



92. The availability of needs data therefore seems to be less of an issue than the strategic use of this data. Interviews and document analysis highlighted that an overview, map, or analysis of the relative quantity and severity of needs and current coverage by WFP and the food security cluster was not readily available. This makes it difficult to identify imbalances or gaps in coverage, which in turn could be used to guide WFP when allocating its flexible or semi-flexible resources or when advocating to donors. In addition, in many contexts, refugee or internally displaced person status (rather than need) is still an important criterion for beneficiary selection, even if there has been a general shift from status-based to needs-based targeting.

93. **Undue government influence:** The evaluation found that governments or de facto authorities at times seek to influence needs data and beneficiary selection and that this can limit the ability of WFP to deliver aid impartially. Different ways of handling these attempts show that WFP does not have a coherent or corporate stance on this issue. In several cases, for example, governments objected to the results of WFP needs assessments. Depending on the context, they achieved delays in the publication of the data, changes to some of the data, or prevented the publication of relevant reports entirely. In conflict contexts, governments and de facto authorities also frequently attempt to influence the selection of beneficiaries – for example, by providing beneficiary lists themselves or by requesting the right to review the lists of humanitarian organizations. WFP and its partners handle these situations in different ways, with some organizations refusing to share beneficiary lists and insisting on validating government lists, while others share lists and use government lists relatively directly. One partner organization, for example, reported that WFP requested that it keep delivering when WFP stopped distributions because the local authority insisted on controlling beneficiary lists. In other conflict settings, government agencies themselves were in charge of distributing WFP food assistance to affected people and were directly responsible for beneficiary selection.

94. Host governments and de facto authorities at times also use less direct means to influence beneficiary selection. In various cases examined for this evaluation, for example, they were using

¹¹⁴ FSIN. *Global Report on Food Crises 2017*. 2017

selective access constraints and obstacles to prevent aid from reaching certain groups. In response, WFP worked to ease or remove restrictions. There was no evidence of WFP suspending assistance to other parts of the population in order to exert pressure.

95. **Unclear handling of ethical targeting dilemmas:** Interviewees were also uncertain how they should handle certain issues, for example, what to do when community norms of sharing assets equally clash with targeting individual needs. This issue is discussed in an evaluation of the WFP operation in Mozambique and arose in several of the contexts analysed for this evaluation as well. Similarly, there is a lack of clarity on whether it is better to reduce rations or apply stricter targeting when resources are insufficient to cover all the needs, and on whether it is better to focus more heavily on the absolute number of people in need or on the severity of their needs.

The Principle of Neutrality

96. **Critical external perception:** Perceptions of WFP neutrality differ greatly between internal and external stakeholders. A large majority of WFP staff (73 percent) and cooperating partners (63 percent) believe that WFP never takes sides in conflicts or engages in controversies. Among external survey respondents, by contrast, only 39 percent hold this view (Figure 18). While external perceptions are always more critical, the differences are starker when it comes to neutrality than for the other principles.

97. Neither do the affected populations see WFP as a strongly neutral actor. Of the survey respondents, 46 percent believe WFP is working to help one side in the conflict to win. In Afghanistan and the Philippines, a clear majority of respondents holds this view (Figure 19). However, survey respondents do not necessarily seem to see this as a bad thing: in two of the countries with very bad neutrality ratings, the Philippines and Nigeria, beneficiaries still rate the overall assistance provided by WFP most positively.

Figure 25: Survey responses to: “How often does WFP take sides in a conflict or engage in controversies of a political, religious, or ideological nature?”

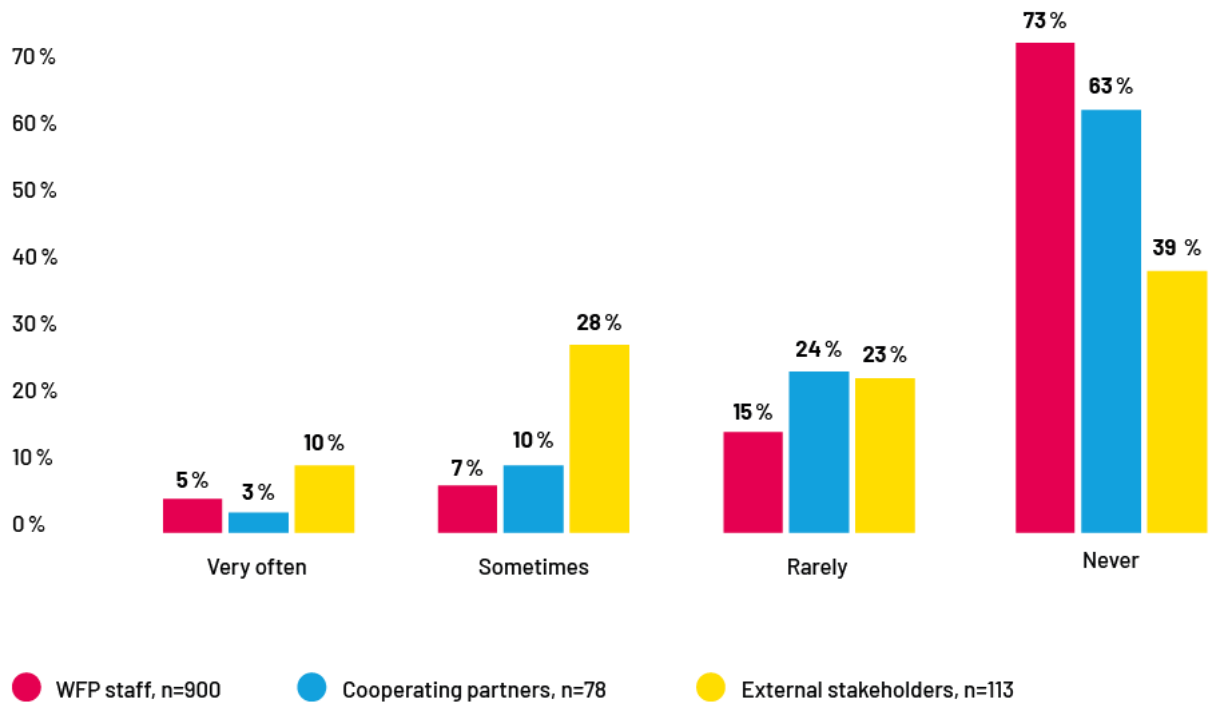
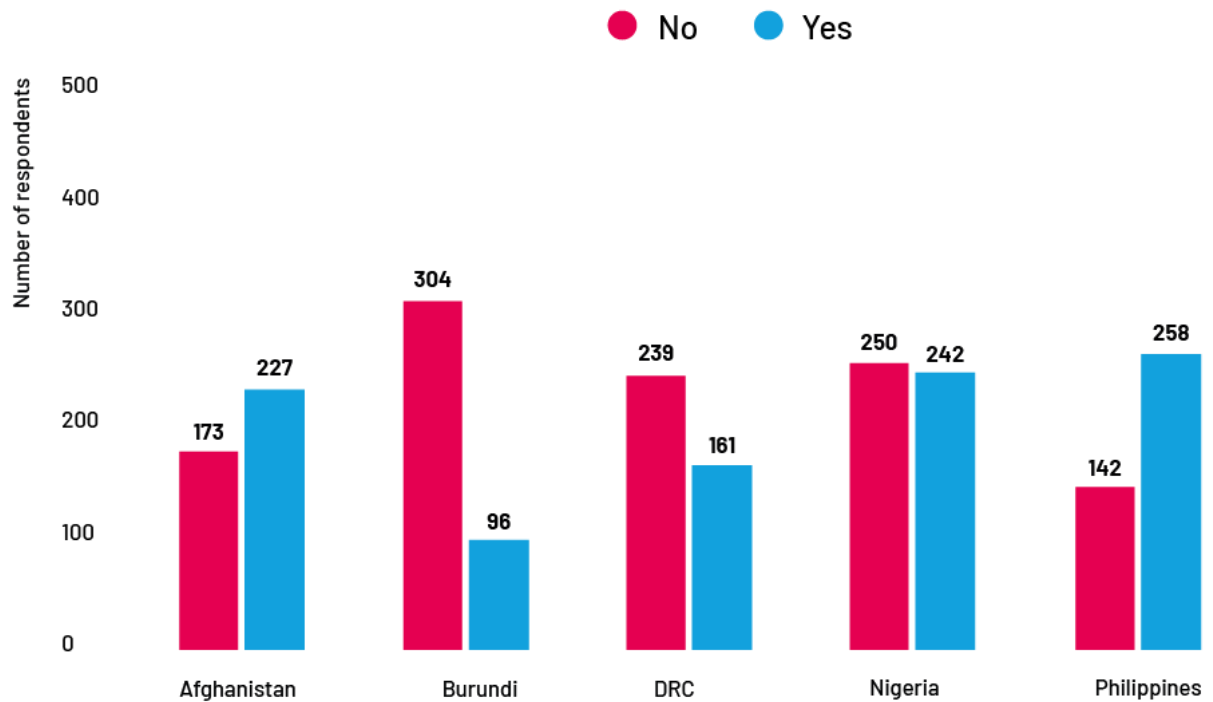


Figure 26: Affected populations’ survey responses to: “Do you think WFP is working to help any one side of the conflict to win in your country?”



98. **Collaboration With governments in conflict contexts:** The main reason for the perceived lack of neutrality by WFP is its close relationship with governments, particularly in contexts where the government is party to an ongoing conflict. Interviewees offered this criticism of many different emergency operations. Evaluations also highlight the issue. Nine out of 11

evaluations¹¹⁵ that discuss the role of the host government question WFP for cooperating too closely. They indicate that, at times, governments exert too much control over operations and/or restrict assistance for specific groups. Several factors account for this close cooperation:

- As a United Nations agency, WFP is governed by member states. WFP is also strongly committed to respecting state sovereignty – respecting the sovereignty, territorial integrity, and unity of states is listed as one of the humanitarian principles of WFP in the policy document. WFP therefore only provides assistance upon the invitation of host governments, unless a United Nations Security Council resolution authorizes it to do otherwise (as in the case of cross-border assistance in Syria).
- WFP does not make much distinction between its development and emergency operations. As discussed above (paragraph 41), the policy on humanitarian principles applies to all WFP activities and therefore does not help in defining different approaches in development or humanitarian, disaster or conflict settings. In practice, WFP is heavily path-dependent in its relationships with governments. When conflict erupts or escalates, WFP often continues using the same approach to collaboration with the government, since there is no clear guidance on this issue, and it often takes time for emergency specialists to take on management responsibilities within the country team. Later on, however, it is often very difficult to change this approach.
- In the contexts observed for the evaluation, WFP plays a weak role in advocating and raising awareness of the humanitarian principles among host governments. Resident/humanitarian coordinators, OCHA, and the Red Cross/Red Crescent Movement play a crucial role in this respect. However, both the staff and the partners interviewed highlighted that host governments' lack of awareness and understanding of the humanitarian principles remained an important constraint and suggested that WFP should play a more active role.

99. As WFP moves toward a closer alignment with host government priorities – for example, by developing country strategic plans – it will be important to put more emphasis on the humanitarian principles in communications with host governments (see recommendation 1).

100. **Frequent use of armed escorts** : In theory, humanitarian agencies only use armed escorts as a “last resort.”¹¹⁶ In practice, however, WFP, being part of the broader security management system of the United Nations, is using armed escorts routinely in many contexts. In some countries, WFP relies on United Nations peacekeeping missions to provide escorts. In others, it uses private contractors or government forces, drawn for example from the police force, the military police, the army, or anti-terror units. Private contractors are paid for their services. Government escorts often receive a “per diem” and are also paid in some cases.

¹¹⁵Evaluations raising critical aspects: 1. WFP (2014) 'Mozambique, Protracted Relief and Recovery Operation 200355, Assistance to Vulnerable Groups and Disaster-Affected Populations in Mozambique: An Evaluation of WFP's Operation (2012-2014)'; 2. WFP (2016) 'Operaciones Prolongadas de Socorro y Recuperación – América Central 200490 Restablecimiento de la Seguridad Alimentaria y los medios de subsistencia de los grupos vulnerables afectados por crisis recurrentes en El Salvador, Guatemala, Honduras y Nicaragua (2014-2016)'; 3. WFP (2017) 'Sri Lanka: An Evaluation of WFP's Portfolio (2011–2015)'; 4. WFP (2013) 'Sudan: An Evaluation of WFP's Portfolio 2010–2012'; 5. WFP (2012) 'Afghanistan: An Evaluation of WFP's Portfolio'; 6. 'An Evaluation of WFP's Regional Response to the Syrian Crisis, 2011-2014' (2015); 7. 'Kenya, PRRO 200174, Food Assistance to Refugees: An Evaluation of WFP's Operation (2011-2013)' (2014); 8. 'Ukraine – EMOP 200765 Emergency Assistance to Civilians Affected by the Conflict in Eastern Ukraine November 2014 – December 2015' (2016); 9. 'Mali, Opération D'urgence (EMOP) 200525, «Assistance Pour Les Populations Affectées Par La Crise Au Mali: Personnes Déplacées, Familles Hôtes, Et Communautés Fragiles» (2013-2014)' (2014).

Evaluations highlighting positive aspects: 10. 'Kenya, PRRO 200174, Food Assistance to Refugees: An Evaluation of WFP's Operation (2011-2013)' (2014) and 11. 'Philippines, Protracted Relief and Recovery Operation PRRO 200296: Support for Returnees and Other Conflict-Affected Households in Central Mindanao, and National Capacity Development in Disaster Preparedness and Response 01 May 2012 to 30 April 2014' (2014).

¹¹⁶ [Inter-Agency Standing Committee. "IASC Non-Binding Guidelines on the Use of Armed Escorts for Humanitarian Convoys." UNOCHA, 27 February 2013.](#)

101. In some cases, WFP has developed successful alternatives to armed escorts. In one case, for example, the United Nations peacekeeping force provided ambient security – general highway patrols – instead of direct armed escorts. While the ability of WFP to shape approaches to security management are limited because it is part of the broader security management system of the United Nations, these examples show that it can influence relevant decisions. As a member of the security management team alongside other United Nations agencies and the United Nations Department for Safety and Security (UNDSS), WFP can contribute analysis and options to the debate. Once an approach is adopted for the United Nations Country Team, the WFP Country Director can seek derogations for programmes that are deemed critical.¹¹⁷ However, these best-practice examples were rare, and there is a general perception that WFP often is taking the “path of least resistance” and using armed escorts too readily. This is linked to the security capacity of WFP. Generally, security capacity is seen as a crucial asset to enabling access. However, this capacity is not always sufficiently strong, and it is not often used strategically to ensure that security approaches conform with humanitarian principles.

102. Among the interviewees who commented on the issue, 30 percent saw the use of armed escorts by WFP as highly problematic and 40 percent as somewhat problematic. They noted that the ready use of armed escorts had negative effects on the perceived neutrality of WFP, contributed to a general sense of insecurity among the population, and also had negative effects on other organizations. They also pointed to several situations in which they suspected the security providers of exaggerating threats or even staging attacks in order to extend their lucrative contracts.

103. **Largely neutral external communication:** The vast majority of public statements by the global and country management of WFP are neutral in content and tone. Since early 2017, there have been more executive statements in the media and on social media that explicitly refer to specific governments or groups. WFP staff and partners welcomed this more explicit approach, as long as it is used to highlight violations of international humanitarian law. By contrast, they were highly concerned about the recent positioning of WFP as being on the [frontlines in the fight against terrorism](#). Some observers noted that recent communications adopt the politicized language of major donors, referring to “terrorists” and “[liberated areas](#)” for example.

104. **Strong efforts to prevent assistance reaching combatants:** WFP staff and partners share a clear understanding that they should not provide food assistance to active combatants. In one case, WFP and other humanitarian organizations decided not to provide assistance in areas where a specific non-state armed group was active because they saw the group as too closely linked with communities, thereby also depriving civilians of assistance. Yet WFP and its partners cannot always prevent assistance from being taxed or looted – and therefore indirectly falling into the hands of armed actors. In several contexts,¹¹⁸ WFP is subject to allegations of transporting weapons or supporting “terrorists”. Even if these allegations are unfounded, they can affect the reputation of WFP. Several interviewees argued that better community engagement and public communication could limit rumours and similar allegations.

The Principle of Operational Independence

105. **Little awareness and understanding of operational independence:** Operational independence is the newest humanitarian principle adopted by the United Nations and, not surprisingly, the least understood.¹¹⁹ It does not feature in the original policy document of WFP. A number of the staff members interviewed were therefore surprised to learn that WFP subscribes

¹¹⁷ See [Programme Criticality Steering Group. United Nations System Programme Criticality Framework. 2016.](#)

¹¹⁸ Social media users making these allegations refer to Syria, Turkey, Yemen, and Myanmar. In one highly visible case, WFP was also accused of being implicated in the death of a journalist who had reported on these issues.

¹¹⁹ UNICEF does not refer to independence at all, whereas UNHCR refers to the principle of independence.

to it. Staff members demonstrated different understandings of independence: as referring to the importance of having an independent logistics capacity, as a requirement to keep their personal political convictions separate from their jobs, or as a variation of impartiality and the requirement to provide assistance based solely on need. Cooperating partners most frequently referred to their own independence from WFP as their “donor.”

106. **Strong dependence on donor funding:** The evaluation concentrated on the assessment of WFP operational independence from the non-humanitarian interests of its donors. Unlike many other United Nations agencies, WFP does not receive a core budget funded through assessed contributions from United Nations member states, but relies entirely on voluntary contributions. The potential exposure of WFP to donor interests is particularly high due to the following factors:

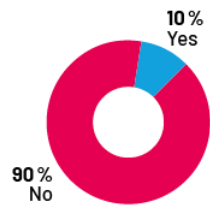
- Donor funding is highly concentrated. In 2016, the three biggest donors to WFP– the United States of America, the European Commission, and Germany – contributed over 64 percent of its total budget.¹²⁰
- Only a small share of contributions – 6.45 percent in 2016 – are multilateral and thereby fully unearmarked. This share has been declining steadily in recent years.¹²¹ No global data on other forms of earmarking is available. However, emerging findings from an as yet unpublished study by the Boston Consulting Group on advance financing indicate that earmarking is strong. Interviewees also feel that the level of donor earmarking is increasing, despite global commitments to decrease it as part of the Grand Bargain.
- A majority of the interviewees who commented on the issue felt that WFP was donor-driven and hesitant to use its strategic position to influence donors. However, interviewees and survey respondents indicate that donor pressure on WFP to follow non-humanitarian objectives is relatively rare. At the same time, respondents also believe WFP is often not able to defend itself against such donor pressure (Figure 20). While a majority of the affected people participating in the survey believe WFP is independent of its donors, a significant minority (39 percent) hold the opposite view (Figure 21). Only very rarely did interviewees mention examples of WFP refusing donor funding. Interviewees also provided examples in which WFP accepted the conditions attached to donor funding despite serious concerns – for example, to provide cash assistance despite clear indications that the market situation was not appropriate for a cash intervention.

¹²⁰ Data source: <https://www.wfp.org/funding/year/2016>.

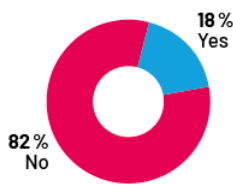
¹²¹ Data source: [WFP's Use of Multilateral Funding, 2016 Report](#), p. 3.

Figure 27: Survey results on independence from donor pressure

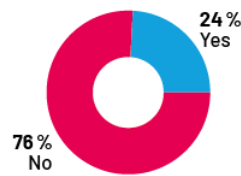
Do you know of any cases where donors put pressure on WFP to deliver assistance following political rather than humanitarian objectives?



WFP



Cooperating partners



External stakeholders

How often is WFP able to defend against such donor attempts to exert political pressure?

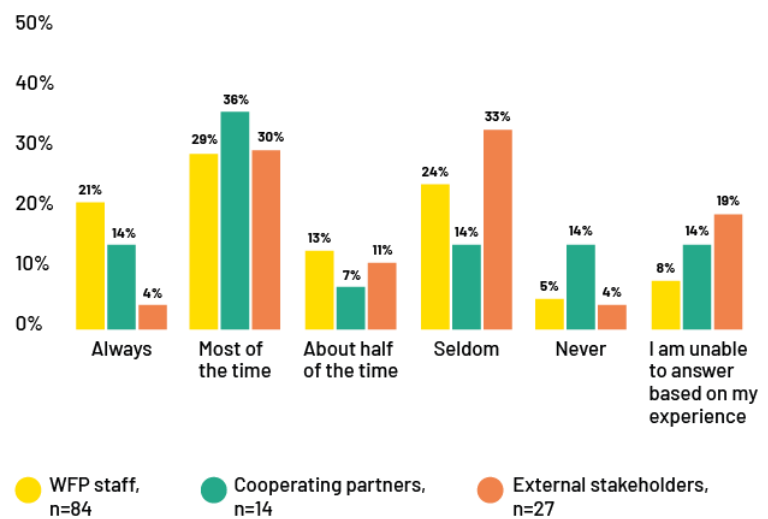
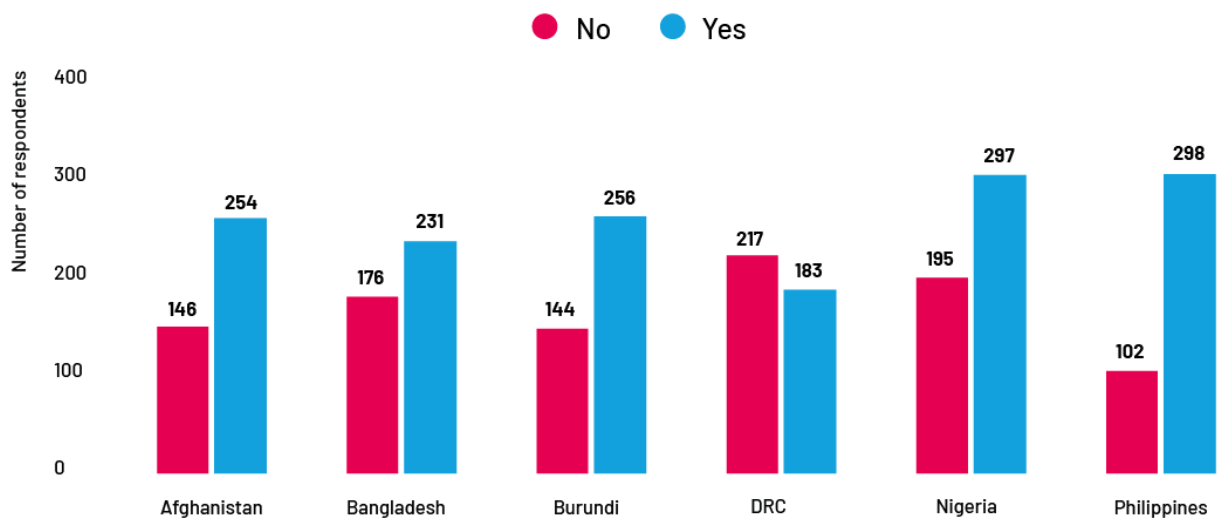


Figure 28: Affected populations' survey responses on whether WFP is independent of its major donors



2.3. Most Important Enabling and Constraining Factors (EQ3)

107. Many aspects of the WFP set-up and ways of working affect its performance on access and humanitarian principles. This section discusses factors that emerged as particularly salient over the course of this evaluation: the mandate and organizational culture of WFP, the role of humanitarian and commercial partners, the relationship of WFP with host governments and non-state armed groups, institutional processes and staff capacity, and security management.

Mandate

108. **Food assistance mandate facilitates access:** Interviewees frequently mentioned the WFP mandate to provide food assistance as one of the most important factors facilitating the organization's access to people in need. They highlighted the following considerations:

- The mandate focuses on assistance rather than protection. Its presence and activities are therefore much less controversial – particularly in conflict contexts – than those of many other humanitarian organizations.
- Food distributions can take place within relatively short timeframes and require limited technical capacities. This enables WFP to make use of even short windows of opportunity to serve an area and to work through local partners in most contexts, even if this sometimes entails compromises regarding targeting and monitoring.
- Food distributions, however, require regular access over time. They might also face time pressure, since food items may expire or perish.
- Food is essential to survival. Where it is scarce, it is therefore a highly sought-after commodity. This increases the acceptance of WFP and its partners among communities and thereby increases access. However, it can also attract efforts to manipulate or divert aid. Moreover, conflict parties in several contexts have been using food deprivation and starvation as a war tactic, deliberately restricting access for WFP. Several external interviewees questioned whether WFP has a sufficient understanding of how its assistance affects the war economy. No country office visited for this evaluation had conducted structured analyses of the political economy of aid in the given context.

Organizational Culture

109. **Priority of access and humanity over other considerations:** Its organizational culture has frequently led WFP to give precedence to humanity and access over other considerations:

- Despite the recent increase in cash based transfers and the use of technological solutions for delivering assistance, the WFP logistics motto – “we deliver” – is still widely reflected in the organization's mentality. As interviewees explained, the perceived urgency of food needs, combined with a strong institutional pride in the ability to move large quantities of commodities, overcome obstacles, and deliver quickly, means that delivery in the short term is usually given strong weight compared to longer-term considerations, including the perceived neutrality, independence and impartiality of WFP.
- There have been incentives to prioritize quantity over quality. The direct support costs of an operation, which include staff costs, are [calculated](#) as a percentage of each country's direct operational costs (that is, the implementation of food and cash assistance activities). The more WFP implements, therefore, the higher its support costs are. The situation is similar for cooperating partners. An important share of their funding is calculated based on how much food or cash is distributed. Funds are also only reimbursed based on proof of distribution.¹²²

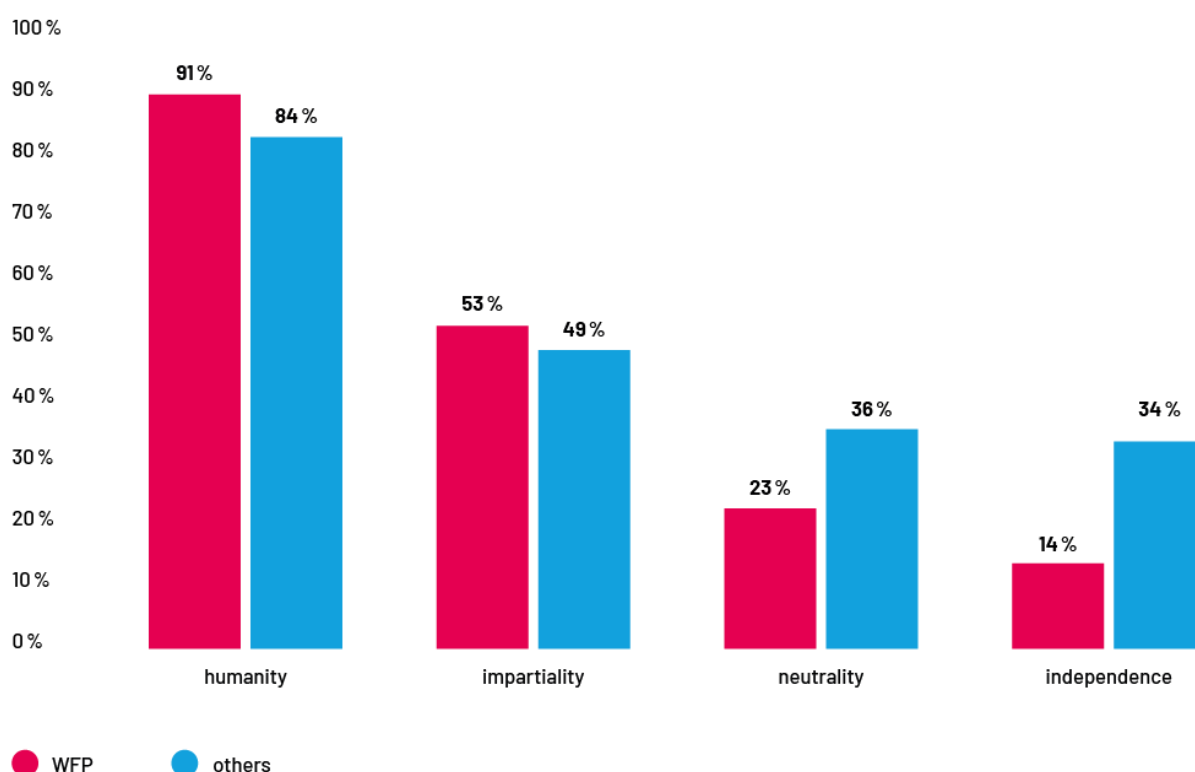
¹²² See, e.g., WFP. field-level agreement Annex 1B: Special Conditions for Cash Distribution Activities. 2012

- Long-term staff members interviewed for this evaluation noted a trend toward greater risk-aversion among donors and within WFP. In recent years, the organization has invested in risk management, creating an enterprise risk management division and investing in the implementation of its anti-fraud and anti-corruption policies as well as audit functions and the adoption of an updated risk appetite statement. However, these investments do not seem to have led to more open or systematic discussions about how to handle risks involving compromises on humanitarian principles and access. The level of discussion seems to depend on the context. Interviewees in several operations, including senior managers, felt that sensitive issues are not sufficiently discussed and that WFP does not always have adequate measures in place to protect those who take risks in defending a principled approach. This contrasts with the survey findings, where most respondents indicated that they feel rather well protected by WFP when making a tough access decision.

110. Interviews also clearly reflect these differences between the performance of WFP on its principles. While an overwhelming majority of interviewees saw WFP standing on humanity positively or very positively, this share declined successively when moving to impartiality, neutrality, and operational independence. Interestingly, WFP staff members are more critical on operational independence and neutrality than external stakeholders (

111. *Figure 29*).

Figure 29: Share of interviewees expressing a positive or very positive opinion of the performance of WFP on different humanitarian principles



Humanitarian and Commercial Partners

112. **Crucial role of partners in enabling access:** As discussed in paragraph 688, WFP relies heavily on partners to deliver assistance. Where access is restricted, WFP chooses its cooperating partners largely based on their capacity to deliver in specific areas. Statistically, the availability of partners is a significant factor explaining the level of coverage WFP achieves. It is stronger as a factor in the regression model that includes provinces with zero coverage by WFP. This means that

the availability of partners is particularly important for explaining whether WFP can deliver at all in a given area.

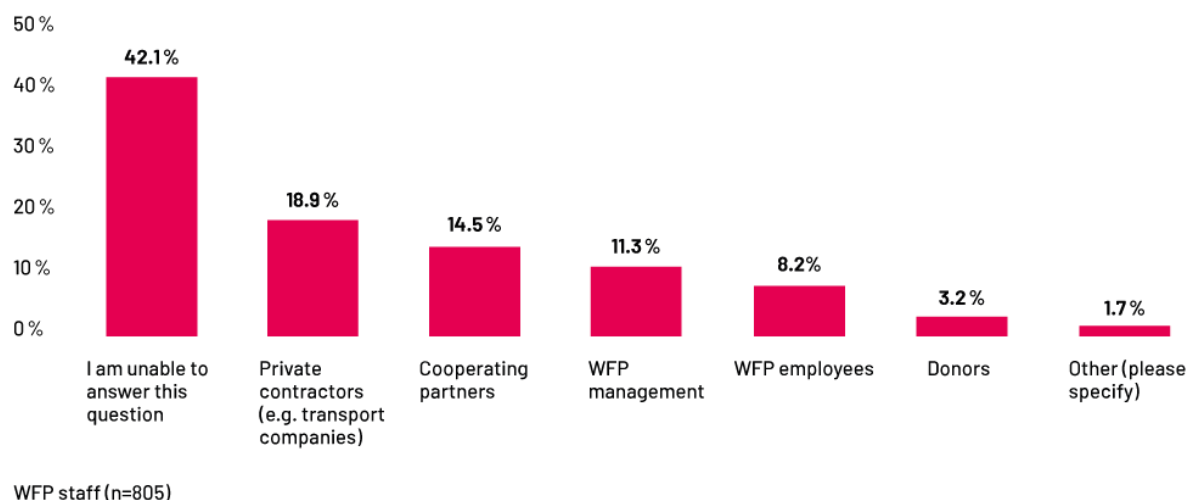
113. **Weaknesses in partner selection, management, and monitoring weaken adherence to principles:** Globally, WFP works with over 1,000 organizations to deliver assistance, including 765 national NGOs, 173 international NGOs, and 70 national Red Cross and Red Crescent Societies.¹²³ Naturally, they represent a broad spectrum of approaches to the humanitarian principles. A minority of partners holds a critical view of the level of adherence by WFP to the humanitarian principles. Twenty three percent of cooperating partner survey respondents believe WFP staff either do not know what the principles are or do not know how to apply them. In the interviews, a small number of partners indicated that they do not cooperate with WFP in certain contexts out of a concern for the principles.

114. At the same time, partners – including private contractors and cooperating partners – are seen as the weakest link in the principled delivery of assistance. Survey respondents identified private contractors as the first and cooperating partners as the second most likely actors to accept problematic compromises in order to achieve access (Figure 23). In addition to the weaknesses in partner selection (paragraphs 589-590) and monitoring (paragraph 73) discussed above, many partners noted that fierce competition and pressures on price made it more difficult for them to uphold humanitarian principles. Examples included WFP rejecting requests to fund training, monitoring, and evaluation capacity, accountability to affected population systems, or elements deemed important for security management, as well as pressure to continue delivering when the partner wanted to suspend operations out of a concern for humanitarian principles. A recent [evaluation of WFP Corporate Partnership Strategy](#)¹²⁴ also noted room for improvement on administrative arrangements, as well as the need to continue NGO partnerships beyond transactional relationships and to strengthen consultation.

¹²³ WFP. *Annual Report on Partnerships*. 2015.

¹²⁴ WFP. *WFP Corporate Partnership Strategy (2014-2017)*. 2014

Figure 30: Survey responses to: “Which of the following actors is most likely to accept problematic compromises to achieve access?”



115. With regard to private contractors, interviewees criticized the lack of oversight and control by WFP over their business practices. Commercial contractors, such as transport companies and vendors involved in cash based transfer programmes, must address regularly occurring issues and obstacles – such as demands for payments at checkpoints or security arrangements – on their own and factor these into the offers they submit to WFP. They only involve WFP when larger, unexpected issues occur – for example, when trucks are looted or attacked. While WFP rigorously monitors price and compliance, it lacks information and control over how its commercial partners manage access challenges, including on sensitive issues such as demands for taxation, official and unofficial fees at checkpoints, or the use of armed escorts.

Relationships With Host Governments and Non-state armed groups

116. **Relationships with host governments can undermine neutrality and impartiality if humanitarian principles are not underscored:** As discussed above (paragraph 933), WFP maintains close relationships with host governments. In many situations, this facilitates government authorization and enhances access by WFP, at least to certain people in need. The evaluation found, however, that WFP does not have a strong track-record in advocating on the need for principled engagement whereby humanitarian principles are respected in areas that experience, or are at risk of, conflict. In some contexts, this may undermine the perceived neutrality of WFP and limit the impartiality of the assistance it provides. Cases in which WFP sustains delivery through government agencies in some conflict contexts, or accepts significant government influence with regard to needs analysis and beneficiary selection, are the most concerning.

117. The role of host governments in WFP strategic planning is likely to increase further. The WFP Strategic Plan 2017–2020 positions WFP in a closer relationship to government partners. The Integrated Road Map reform process introduces multi-year strategic country plans (including options to formulate interim country plans and limited emergency operations) and stresses alignment with WFP partners, including governments.¹²⁵ These reform processes are in line with broader reform efforts of the United Nations, such as the [New Way of Working](#) initiative. There is currently no discussion at the global level on the implications of these broader reforms in conflict contexts.

¹²⁵ WFP. *Policy on Country Strategic Plans*. 2016

118. **Little engagement with non-state armed groups:** WFP does not mirror its relationship with host governments when it comes to close engagement with non-state armed groups or de facto authorities in opposition-held areas. As discussed in paragraph 56, staff members are confused about the role and mandate of WFP in this respect, with a large share believing that WFP cannot and does not engage with non-state armed groups. Correspondingly, its actual level of engagement varies between contexts. The counter-terrorism legislation of important donor governments further inhibits contacts with such groups listed as terrorist organizations in some countries. However, only a small number of survey respondents (4.1 percent) indicated this as one of their top three concerns. The lack of systematic and strategic engagement with non-state armed groups in many contexts not only undermines the perceived neutrality of WFP, it can also limit its access to areas controlled by these groups.

Institutional Processes and Staff Competence

119. **Unclear responsibilities for access and principles at country level:** At headquarters, responsibility for the policies on humanitarian principles and access lies with the programme and policy division. The creation of a director-level and an operational group on access has led to more coherent thinking on this issue. At the country level, however, responsibilities for access and humanitarian principles are not clearly allocated to a single position. In practice, different positions – management, security, logistics, or programme – have taken on responsibilities relating to access. Only a few country offices have created an access team or have dedicated capacity for access negotiations.

120. **Strong decentralization and flexibility:** Decision-making within WFP in general is highly decentralized. The management teams in country offices and sub-offices are therefore able to apply the humanitarian principles and find approaches to access that fit the contexts in which they operate. This flexibility has enabled a relatively high level of access for WFP and its partners.

121. **Limited coherence:** The downside of this approach is that it limits coherence between different country offices and sometimes between sub-offices, including with regard to sensitive decisions on humanitarian principles. Networks for discussing tricky questions on access and humanitarian principles are highly fragmented and decentralized (paragraph 54). Interviewees described WFP formal coordination and decision-making structures, namely the strategic and operational task forces, as ill-suited to discussing trade-offs between access and humanitarian principles. With a packed agenda, they did not offer enough space to enter into discussions about details. Moreover, they were seen as too formal to raise sensitive trade-offs, especially since headquarters was often perceived as pushing for access and delivery, rather than for the protection of humanitarian principles. Instead of these formal fora, the leadership of many country operations relied on informal discussions with the Assistant Executive Director. Not all the managers of country operations, however, felt they had equal access to this level of WFP leadership. There was also no guidance or benchmarks regarding which decisions required this kind of escalation.

122. **Significant shortcomings in corporate efforts to ensure consistent staff competence:** For an organization relying as much on decentralized decisions as WFP, it is all the more important to ensure consistently high levels of staff competence on humanitarian principles and access. WFP has a highly experienced and broadly recognized “A-team” of seasoned emergency responders. However, this evaluation noted serious shortcomings in corporate efforts to ensure that such capacity and competence were consistently available. These shortcomings – many of which the WFP human resources division is in the process of addressing or planning to address – include the following:

- Current deployment processes do not always result in key emergency operations being staffed with managers experienced in humanitarian situations.

- Staff deployed in country or sub-office management positions are not systematically trained in humanitarian principles and access negotiations, and there is little peer exchange and support.
- Induction processes for new staff are weak. Most staff members receive little induction training when they join WFP. Some receive copies or links to relevant policies, but they are usually not allocated time or orientation for reading and processing them.
- Similarly, training on principles and access is weak. Relevant materials have been developed and successfully applied to small groups of staff, but they have not been broadly rolled out. The compulsory online training that all new staff must undergo has the furthest reach. It communicates the importance of rules about personal behaviour – such as the prevention of sexual exploitation and abuse, fraud, and corruption – but it does not help staff members to understand what the humanitarian principles mean for institutional practice within WFP. National staff in particular feel that more detailed face-to-face training still largely targets international staff. Participants generally appreciated the training but noted gaps in its strategic use – for example, when training of trainers was not followed up, or when training participants were not subsequently deployed in a role in which they could apply their new skills.
- WFP relies heavily on well-connected and informed national staff for good contextual understanding and to facilitate access negotiations. Since there is no recognized “access negotiator” profile in WFP, however, these contributions are not often institutionally recognized. WFP also chooses its local staff based on competence and without regard for ethnic, political, or other affiliations. While managers explain this as part of a neutral and impartial approach, the practice renders WFP “background blind.” As a result, the organization may ignore attributes relevant to neutrality perceptions and fail to mitigate their effects.

123. It is interesting to note that women and men found different policy implementation measures more helpful. Among the staff members responding to the survey, women found discussions on the humanitarian principles during office meetings (25.2 percent) more important than circulars and communications from headquarters (18.5 percent). The relationship was inverse for men (19.1 percent versus 24 percent respectively). The same was true for access, where 27.9 percent of men identified circulars from headquarters as helpful, while only 16.7 percent of women agreed. Men also attached more importance to their practical experience (35.1 percent) than women did (30.6 percent) and found advice from experienced colleagues more helpful (31.1 percent versus 26.1 percent for women).

Security Management

124. **Mixed record of security management for principled access:** As a United Nations agency, WFP is part of the United Nation’s integrated security management system. Recent reforms allow individual agencies more flexibility to decide on acceptable levels of residual risk, depending on the criticality of their programmes. WFP has a significant field security capacity, which has been crucial in enabling its presence. In some contexts, WFP has used this capacity proactively for principled access. For example, it used its security analysis and expertise within United Nations security management teams, influencing the decisions of designated officials responsible for security management. Its own security capacity also creates the basis on which WFP seeks derogations from system-wide security rules. However, the field security capacity of WFP was often either not strong enough or not sufficiently focused on finding solutions compatible with the humanitarian principles. In these cases, WFP did not seek to influence the decisions of the inter-agency security management team to recommend alternatives to the use of armed escorts, for example (paragraph 100).

3. Conclusions

125. Humanitarian principles and access are more relevant today than ever before, and need increased institutional attention and support. The evaluation found that the humanitarian principles and issues of access are central to the mission and mandate of WFP and have been increasingly challenged in many of its operations. The vast majority of stakeholders also believe that WFP needs to increase its investment in humanitarian principles and access as a corporate priority, especially in countries where WFP faces significant constraints on reaching those most vulnerable. The recommendations below, particularly recommendations 3, 4, 7, and 8, suggest priority areas for investment.

126. Humanitarian principles and access policies are largely coherent, but have flaws and would benefit from refinement during implementation. The evaluation found that the policy documents on humanitarian principles and access are largely coherent, relevant, and appropriate. Both reflect system-wide positions on the issues and both are consistent with other WFP policies on related subjects. There are, however, some key weaknesses. The humanitarian principles policy is weakened by presenting the core standards alongside a wider range of WFP standards. This has increased confusion and risks diluting the importance of the core principles. Moreover, the policy does not distinguish between different contexts, such as emergency and development interventions and conflict and natural disaster settings. Neither policy acknowledges certain tensions and trade-offs that are evident in considering their application. However, feedback from interviews and stakeholder workshops suggest that a formal revision of the policies would not be the most effective means for addressing these issues. The evaluation therefore concludes that WFP would benefit from refining and clarifying these aspects in new guidance and training, rather than through a formal policy revision (see recommendation 1).

127. There has been under-investment in implementation of the policies. The policy documents themselves have had little effect on WFP practices on access and humanitarian principles. This is partly because WFP has not invested in dissemination, and therefore few staff members and partners are aware of the policy documents. In addition the documents are long, and there are many other policies. While this is not surprising, given the policies were intended to codify existing practice and initially did not include any strategies or resources for policy implementation, it undermines their effectiveness. Notably, efforts to implement the policy on access increased recently, but these efforts remain dependent on extra-budgetary funding, which is hard to predict and sustain, and the overall level of investment remains low (paragraph 50o).

128. A lack of coherence with other cross-cutting areas and the lack of a formalized, institutional “home” both undermine policy effectiveness. Efforts to strengthen aspects related to the “how to” and the quality of assistance are fragmented within WFP. Responsibilities are split across different teams, units, and offices (paragraph 48). Greater institutional coherence is needed (see recommendation 2). Equally, at the field level, access and humanitarian principles do not have a clear institutional “home”. Depending on the situation, members of WFP field management (heads of office, deputy heads of office, heads of sub-office), security, logistics, or programme staff take the lead role in negotiating access. While this approach creates flexibility, in some cases it has also led to inconsistency and the frequent prioritization of access and humanity over the other humanitarian principles (see recommendations 2 and 4).

129. There is strong access for delivery through partners and commercial providers, but weaker access for needs assessment and monitoring. Obstacles to humanitarian access are frequent. By working through partners, WFP manages to cover a significant share of food security needs in emergencies (paragraph 69). WFP performs particularly well in the most difficult operating environments. Together with its partners, it achieves higher coverage where insecurity is high.

Some cooperating partners apply humanitarian principles more strictly than WFP, but standards vary greatly between them, and greater policy awareness as well as policy implementation is warranted (see recommendation 5). The same applies to WFP engagement of commercial providers. Commercial partners, particularly transport companies, as well as cash and vendors in cash based transfer programmes play a critical role in the WFP supply chain. While WFP rigorously monitors price and compliance, it lacks information and control over how its commercial partners manage access challenges, including on sensitive issues such as demands for taxation, official or unofficial fees at checkpoints, or the use of armed escorts (see recommendation 6). In addition, the ability of WFP to assess needs and to monitor the activities of its partners and commercial providers in these same settings is more limited and requires increased investment (see recommendations 5 and 7).

130. There are significant compromises on humanitarian principles. The high level of delivery access means that the performance of WFP on the principle of humanity is strong. Uneven levels of coverage of humanitarian food security needs, both between and within countries, raise concerns regarding the principle of impartiality. In some conflict contexts, WFP neutrality is hampered because of its close association with host governments and its frequent use of armed escorts. Its strong dependence on highly earmarked donor funding represents a potential risk to the operational independence of WFP. Interviews clearly reflect these differences between WFP performance on the principles, with interviewees perceiving WFP performance on humanity more positively than its progress on impartiality, neutrality, and operational independence (paragraph 110, see recommendations 2, 9, and 10).

131. There are both win-win factors and factors entailing trade-offs. Some key factors affect WFP performance on access and on humanitarian principles in the same way. Stronger staff competence, for example, would enhance the capacity of WFP to negotiate access and at the same time increase its consideration for humanitarian principles. Other factors, by contrast, entail a trade-off. The WFP organizational culture of “we deliver,” for example, currently enables its access and allows a strong performance on humanity, but it also encourages compromises on other humanitarian principles. A more principled approach would entail re-balancing the WFP organizational culture to give stronger priority to impartiality, neutrality and independence, which may come at the expense of access in the short term. Greater investment in WFP operational independence, for example, could support this re-balancing, increasing the organization’s ability to address issues of impartiality as well as manage related risks (fiduciary, reputational, and security).

4. Recommendations

132. The evaluation found that access and humanitarian principles cut across many different aspects of WFP policies, management, capacities, and processes, as well as relations with donor governments, cooperating partners, and commercial providers. The recommendations of this evaluation therefore also concern the broad range of WFP institutional priorities as well as different stakeholders. The recommendations cover: policy implementation measures, the application of training and guidance to improve competencies, systematizing decision-making and establishing clearer responsibilities for principled access, improving policy implementation when working through partners or commercial providers, continuing investments in needs assessment, strengthening security management, and lastly, enhancing operational independence. Recommendations are presented below, indicating suggested timeframes and lead responsibility for implementation. Annex IV provides additional details and suggested activities for implementing the recommendations.

Recommendation	Timing and responsible units
Recommendation 1: Policy dissemination	
<p>Strengthen the dissemination and operationalization of the policies on access and humanitarian principles:</p> <ul style="list-style-type: none"> • Develop and compile short versions of the policies and ensure their integration in core institutional guidance • Share guidance and training materials more widely and adapt them to specific contexts where necessary • Increase the accountability of Country Directors for policy implementation • Strengthen communications on the humanitarian principles with host governments, de facto authorities and communities • Clarify outstanding policy issues in new guidance and training 	<p>2019</p> <p>Policy and programme division</p>
Recommendation 2: Prioritization of principles	
<p>Put in place measures to increase the priority given to neutrality, impartiality and operational independence relative to access and humanity:</p> <ul style="list-style-type: none"> • Ensure that humanitarian principles are taken into account in the development of other policies and strategies • Identify triggers for corporate decisions on complex trade-offs • Increase the coherence of efforts relating to cross-cutting issues such as gender, protection and accountability to affected populations 	<p>2018</p> <p>Policy and programme division</p>
Recommendation 3: Staff capacity	

<p>Considerably strengthen staff competencies on humanitarian principles and access, particularly in complex emergency situations:</p> <ul style="list-style-type: none"> • Provide standard, mandatory induction, including on access and humanitarian principles, to all WFP personnel • Develop tailored training modules on humanitarian principles and access for existing training, including compulsory online courses • Strengthen mentoring, continue supporting the Joint Centre of Competence on Humanitarian Negotiation and enable the deployment of experienced national staff • Assign operational responsibility for issues relating to humanitarian principles and access to a field management position reporting to the Country Director • Facilitate peer exchanges • Include humanitarian principles and access in the terms of reference of all regional humanitarian advisers • Ensure adequate field capacity for analysing and documenting principled access issues in L3 and L2 emergency responses <p>Ensure compliance with programme criticality processes</p>	<p>2019</p> <p>Human resources division</p>
<p>Recommendation 4: Partnership – cooperating partners</p>	
<p>Give more priority to humanitarian principles in all elements of engagement with cooperating partners:</p> <ul style="list-style-type: none"> • Exchange good practices with donors • Integrate humanitarian principles into standardized partner selection and due diligence, field-level agreements, assessment and training • Strengthen the monitoring capacity of WFP • Better define the standards for accountability to affected populations expected of partners • Improve joint planning and communication with partners, including on risks 	<p>2019</p> <p>Operations services department</p>
<p>Recommendation 5: Partnership – commercial partners</p>	
<p>Increase policy awareness, guidance and training opportunities for commercial partners:</p> <ul style="list-style-type: none"> • Provide guidance and training on how to handle sensitive situations • Require reports on humanitarian principles and accept costs linked to compliance with humanitarian principles where necessary • Where there are risks to compliance with humanitarian principles, rely more strongly on WFP transport assets and staff. 	<p>2019</p> <p>Supply chain division</p>

Recommendation 6: Needs assessment	
<p>Continue investing in and further strengthen needs assessment and the use of needs-assessment data:</p> <ul style="list-style-type: none"> • Continue investing in vulnerability analysis and mapping • Develop a coherent corporate position on how to react when host governments seek to significantly challenge or influence needs-assessment data • Work more actively with the food security cluster to track and document sector coverage of needs • Use partner data more actively for triangulation. 	<p>2019</p> <p>Operations services department</p>
Recommendation 7: Security	
<p>Strengthen the security capacity of WFP in complex emergencies and improve security officers' focus on humanitarian principles and access:</p> <ul style="list-style-type: none"> • Continue to prioritize filling security positions in complex emergencies, including by providing sufficient resources, and improve contractual conditions to strengthen retention of security staff • Adapt terms of reference for field security officers • Engage the security capacity of WFP on operations and programme design 	<p>2019</p> <p>Field security division</p>
Recommendation 8: Donor relations and funding	
<p>8a) Increase and regularize the dialogue with donors on humanitarian principles and access and strengthen principled financing:</p> <ul style="list-style-type: none"> • Improve the overview of global and country-level coverage of needs for advocacy with donors • Hold regular high-level dialogue with donors on their support for a principled response • Establish criteria for rejecting funding when conditions conflict with humanitarian principles • Use flexible funding strategically in high-risk settings where coverage is low • Strengthen non-government funding sources 	<p>2019–2020</p> <p>Government partnerships division</p>
<p>8b) Advocate for stronger support for all the facets of WFP operations that are critical for principled access, including:</p> <ul style="list-style-type: none"> • Application of the Good Humanitarian Donorship commitments and funding according to need • More unconditional funding 	<p>2019–2020</p> <p>Government partnerships division</p>

<ul style="list-style-type: none">• Engagement with WFP on programme criticality, acceptable risk and resources needed to mitigate risks	
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Office of Evaluation

www.wfp.org/evaluation

World Food Programme

Via Cesare Giulio Viola 68/70

00148 Rome, Italy

T +39 06 65131 wfp.org