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 DIRECTORATE-GENERAL HUMANITARIAN AID AND CIVIL PROTECTION - ECHO

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ECHO'S APPROACH TO REMOTE MANAGEMENT

THE PRINCIPLES OF HUMANITY, IMPARTIALITY, INDEPENDENCE AND NEUTRALITY ARE THE CENTRAL FRAMEWORK TO GUIDE ECHO FUNDING. TO ENSURE THAT THESE PRINCIPLES ARE TRANSLATED INTO OPERATIONAL REALITIES AND PRINCIPLED HUMANITARIAN ASSISTANCE, ECHO WILL FUND ACTIONS IMPLEMENTED THROUGH REMOTE MANAGEMENT ONLY WHEN A SERIES OF SPECIFIC CONDITIONS ARE MET.

1. DEFINITION: WHAT IS 'REMOTE MANAGEMENT FOR ECHO?'

ECHO defines remote management as:

An operational approach used to provide relief in situations where humanitarian access to disaster-affected populations for its partner organisations is limited by security concerns and/or formal or informal decisions imposed by de jure or de facto authorities, thus requiring adjustments to the management of the humanitarian actions.

The evolution of a number of humanitarian crises around the world in recent years has, primarily due to security reasons including direct threats to humanitarian organisations, further limited access to affected populations. At the same time, in most cases humanitarian needs have increased precisely in areas that are more difficult to access. It is crucial to reconcile the imperative of providing humanitarian assistance to people in need with managing risks for humanitarian workers. Accountability to beneficiaries and preserving the financial interests of the European Union including limiting the risk of aid diversion, also need to be taken into consideration.

The absence of international staff does not imply automatically a situation of remote management. An action will not be considered remotely managed as long as measures have been put in place that allow those who are ultimately responsible for the action to ensure the required quality. There are however situations where access to international staff is precluded by the authorities, in the absence of security concerns. Due to a variety of reasons and considerations, ECHO may assimilate such situations to remote management to which, however, the criteria set out in this instruction note would not be applicable, with the result that the actions proposed by partners may be considered ineligible. Non international staff includes national/local staff from ECHO's partner organisations, as well as from an implementing partner or from parties sub-contracted by the partner and/or an implementing partner.

There are cases where remote management only applies to parts of the action. For example, hostilities may affect one location covered by a project while other areas

remain accessible. Authorities may prevent travel to one region but allow it to others. As such, ECHO may accept a remote management approach in some parts of a country while precluding it in others.

Many humanitarian actions therefore combine elements of remote and direct management. An action may, for example, include training and capacity building that are implemented directly, while the distribution of relief supplies in unsafe areas is implemented through modalities and staff, including implementing partners, that are supervised remotely by senior staff who retain the management and responsibility for ensuring the quality of the action.

Remote management can have consequences on co-ordination. Therefore, apart from the criteria described below, ECHO will also look at how co-ordination amongst partners/donors can be maintained and/or enhanced despite the restrictions imposed by remote management.

Finally, ECHO will also consider what flexibility is built into the partners' proposals in order to adjust to changes in the security situations, including when applicable phasing out from the remote management mode.

2. DIRECT MANAGEMENT: THE PREFERRED OPTION

ECHO does not fund actions using remote management, other than when a series of specific conditions are met. This strict stance is premised on the following three considerations:

2.1. ECHO is a field-based donor

ECHO staff in Country and Regional Offices makes every effort to visit project implementation sites and engage with the operational staff of partner organisations, and civilian populations, in face-to-face discussions. Being able to visit field projects enables ECHO staff to monitor progress and verify whether activities are implemented in line with agreed modalities. It also helps ensure that ECHO staff are aware of the humanitarian dynamics on the ground. Direct exposure to operational realities enables ECHO to set overall funding priorities and select individual projects accordingly.

If remote management modalities are in place, the ability of ECHO staff to access field locations is limited. Clearly, the access limitations that prompt partners to consider the remote management option are also likely to affect ECHO field staff, not least because partners are less able to provide logistical support and facilitate contacts with beneficiaries and local stakeholders.

2.2. Remote management entails significant risks

The use of remote management and/or outsourcing of aid delivery may entail a transfer of security risks and can also compromise the quality and relevance of humanitarian projects.

Humanitarian organisations need to undertake impartial needs assessments on the ground. It can be difficult, sometimes impossible, to carry out such preparatory work without the participation of humanitarian aid workers who are impartial in the selection of beneficiaries.

In some contexts, humanitarian organisations also find it difficult to locally recruit skilled and experienced staff/local partners.

In addition, remote management may compromise commonly accepted accountability standards. The longer operations are managed remotely, the more restricted implementing organisations and donors are in their ability to judge whether goods and services reach targeted beneficiaries and ensure that humanitarian funds are not diverted.

Finally, humanitarian organisations can fall into the remote management 'trap'. Once they start to manage activities in certain areas remotely, it can be difficult to reverse the process.

2.3. Building acceptance remains the best access strategy

Building acceptance of humanitarian actors and activities among governments, non-state actors and beneficiaries continues to be the most effective and sustainable way of gaining and maintaining access to vulnerable populations. This can be best achieved by strictly adhering to the humanitarian principles of humanity, impartiality, independence and neutrality, and by delivering high quality, needs-based aid. ECHO therefore strives to support humanitarian organisations that seek to build, maintain or regain acceptance from the local communities and can do so when all of their staff are granted by the responsible authorities, being these de jure or de facto, free and safe access to people in need.

3. REMOTE MANAGEMENT: A LAST RESORT

ECHO will consider funding for actions involving remote management based on the questions below. Each question includes one or two criteria to assess the necessity for remote management. Proposed actions that fail to fulfil these criteria will in principle not be eligible for ECHO funding.

Where remote management is proposed by a partner for an ongoing action, due to a change in circumstances that hinders or prevents direct management, ECHO staff will use the same criteria as for new actions to assess whether ECHO funding of the action should be (a) continued, using remote management, (b) suspended or (c) terminated.

There may be situations where an action involving remote management is predicted to deliver substantial humanitarian benefits, despite the non-fulfilment of one or more of the assessment criteria. Such actions may, exceptionally, be funded (or continue to be funded) but only after referral of the case by the head of the geographical unit concerned to the ECHO Director of Operations for decision.

3.1: Is there an access problem due to security or administrative obstacles?

When partners propose remote management for an action, it is important that they provide ECHO with information on the extent of the access problems in the locations concerned. ECHO needs to be satisfied that the circumstances are such as to justify considering a remote management approach (i.e. security concerns and/or bureaucratic obstacles imposed by authorities and/or non-state actors), and that the partner has done what it could to ensure access before proposing this approach.

ECHO is committed to work with its partners and the wider international humanitarian community to advocate for the lift of bureaucratic and administrative obstacles by the relevant authorities. Remote management actions undermining such effort cannot be considered eligible.

As long as comparable options for direct supervision exist, support for remotely managed operations will not be accepted.

Specific assessment criteria applied by ECHO

Information for point (1) below to be found in section 3.1.3 "Problem and risks analysis" (or section 6.6 in case of security related access problems) of the Single Form.

- (1) It is clear that access problems that exist cannot be resolved by the partner, and that these are sufficiently serious to prevent humanitarian aid delivery unless a remote management approach is adopted.
- (2) In ECHO's own assessment, in the same geographical area(s) of implementation, no other humanitarian organisation eligible for ECHO funding, with the required capacity and experience, is willing and able to meet the humanitarian needs identified in the proposed action through direct management.

3.2: Does the proposed action include acceptance-building measures?

The most effective way to mitigate security risks for humanitarian aid workers and gain access to vulnerable populations is to build acceptance of impartial and independent humanitarian action among local communities, government and non-state actors. This requires thorough stakeholder mapping and the direct involvement of staff with the necessary experience and skills to facilitate access negotiations.

Efforts to build acceptance can also help humanitarian organisations avoid falling into the remote management 'trap'. Local government and non-state actors become easily accustomed to the fact that humanitarian projects are implemented with limited direct oversight from those in the partner organisation who are ultimately responsible for the management and the quality of the action. In such cases, partner organisations must demonstrate that they have a strong accountability system in place, and that they have taken measures to gain and maintain access, to ensure that aid is being effectively delivered on the ground.

Specific assessment criteria applied by ECHO

Information to be found in sections 4.3, "Results", 4.7 and 7 "Field Co-ordination" of the Single Form.

- (1) The proposed action identifies actors at local, provincial, national or international level who have or could have an impact on humanitarian access in the proposed geographic area(s) of intervention.
- (2) Where possible, the action includes concrete steps to gain, regain or maintain acceptance of neutral and independent humanitarian action.

3.3: Is it a direct life-saving action or an action aimed at preserving crucial livelihoods?

In view of the risks associated with remote management operations, they should only be supported where justified by a life-saving imperative, directly and/or indirectly through the preservation of crucial livelihoods. Humanitarian actions not essential to saving lives including early recovery, preparedness and linking relief, rehabilitation and development (LRRD), as well as resilience building, will not be supported if their management is to be undertaken remotely.

Specific assessment criterion applied by ECHO

Information to be found in section 4 "Logic of intervention" of the Single Form.

The action subject to remote management is designed to implement direct, life-saving operations or operations aimed at preserving crucial livelihoods.

3.4: Have all possible measures been taken to reduce the risk of losing the lives of those undertaking the work on the ground?

Where access for the staff of the partner organisations who are responsible for the management and for ensuring the quality of the action is hindered because of security risks, transfer of risk towards the organisation's implementing staff on the ground or staff from a different organisation, is not an acceptable alternative by default.

Specific assessment criterion applied by ECHO

Information to be found in section 6.6 "Security constraints" of the Single Form.

Remote management for security reasons can be contemplated only if the partner organisation provides clear evidence that all possible measures have been put in place to reduce and manage the risks for humanitarian workers implementing the action. Furthermore, the partner organisation will have to provide clear evidence that programmes are designed and delivered in a manner that does not impact negatively on the security of the beneficiaries/disaster affected communities.

3.5: What is the source of the needs assessment in a remotely-managed action?

ECHO supports needs-based humanitarian aid. This needs based approach includes the proper targeting of beneficiaries. Preparing accurate and impartial needs assessments, however, is a challenge where access is limited. Powerful local players may try to influence assessments and national/local staff or partners, in particular, may be more susceptible to pressure. They can also be more biased in their choices due to personal ties and loyalties to affected communities.

While using staff with close social ties to targeted communities may help improve access acceptance, in conflict situations partners must, as a minimum requirement, triangulate information before validating an assessment. This may include community representatives, elders, other humanitarian organisations or civilian government representatives and *de facto* authorities. If this verification is not conducted, the risk is that possible beneficiaries are excluded, or that there is an overestimation of the level of need, and so of the intended beneficiary numbers.

The use of mobile and web-based technology, including aerial surveillance and satellite imagery can also be useful in rapidly assessing needs, but should ideally be complemented with direct needs assessment. ECHO has got remote sensing tools at its disposal (e.g. ERCC being the entry point for the Copernicus satellite mapping). These have already been used to support rapid needs assessments in remote areas and are accessible to headquarters and ECHO offices.

Specific assessment criteria applied by ECHO

Information to be found in section 3 "Needs assessment" of the Single form

- (1) The proposed action specifies which sources of information have been used to estimate needs.
- (2) In conflict-affected environments, data collected remotely (e.g. through

national/local staff, external partners or aerial surveillance) have been confirmed through cross verification from direct sources (e.g. IDPs who have fled affected areas, traders or community representatives).

3.6: Have robust systems been put in place to allow staff on the ground to provide all of the relevant information to those who are ultimately responsible for the management and the quality of the action?

The success of remotely-managed actions depends on the skills and experiences of the staff who implement and supervise them. ECHO encourages partners to recruit staff with international humanitarian experience. A balance between exposure to more than one humanitarian context and knowledge of the local context is a key asset.

Where adequate skillsets are difficult to find, the action will need to incorporate extra training and capacity-building. This may be of a general nature (project management, monitoring and evaluation) or involve more technical specialisations (for example targeting health personnel, nutritionists or civil engineers). All staff, not just security officers, should receive security training.

It is for partners to decide whether to organise capacity-building 'in-house' and 'on-the-job' or through external training. Where feasible, ECHO encourages partners to organise joint training or take advantage of existing training events offered, for instance, by NGO coordinating bodies.

Specific assessment criteria applied by ECHO

Information to be found in section 6.1 "Human resources and management capacities" of the Single Form

- (1) Steps have been taken to ensure that partner organisations' staff who are ultimately responsible for the management and the quality of the action are updated at all times with all relevant information concerning the implementation of the action on the ground.
- (2) The action identifies potential qualification gaps and explains where the necessary technical, analytical and managerial skills can be found. If skills' gaps have been identified, the proposal includes relevant training or other measures to address them.

3.7: Are monitoring arrangements adapted for remote management?

Effective monitoring requires at least a minimum level of face-to-face contact between those who are ultimately responsible for the management and the quality of the action, field-based staff and beneficiaries. In remotely managed operations, partners should ensure ways of organising such direct encounters. For example, even when those who retain the management and responsibility for ensuring the quality of the action cannot go to implementation sites, it may be possible for some beneficiaries to travel out to a location, such as a sub-office, where a meeting can be organised. If this is impossible for security, logistical or other reasons, actions relying on remote management must, as a minimum, include measures to organise face-to-face discussions between those who retain the management and responsibility for ensuring the quality of the action and other local stakeholders from the area of intervention, such as community representatives, traditional authorities or traders. Video facilities can be also used.

The effectiveness of the different monitoring methods will vary from one situation to another. Humanitarian organisations need to decide which combination of methods is

most suitable to the particular context.

Other ways of indirectly monitoring activities that humanitarian partner organisations can use could include:

- Mobile and web-based technology;
- Video and photographic evidence to document progress;
- Telephone complaint and feedback mechanisms enabling beneficiaries to report allegations of corruption or mismanagement and/or to provide information about the type and quality of the assistance provided;
- Remote sensing, biometrics and voucher reconciliation;
- Triangulation of information collected internally through discussions with other organisations operating in the same area (peer monitoring);
- As a last resort, where appropriate, and provided the cost-benefit ratio is considered positive by ECHO, using 'third-party' monitors: external consultants who visit project sites that are off-limits to those who retain the management and responsibility for ensuring the quality of the action;
- Humanitarian organisations must ensure that external partners are not affiliated with a party to the conflict or in any other way compromised in their objectivity.

The effectiveness of the different monitoring methods will vary from one situation to another. Humanitarian organisations need to decide which combination of methods is most suitable to the particular context. ECHO may also consider the use of its own remote sensing services for project monitoring or evaluation.

Specific assessment criteria applied by ECHO

Information to be found in section 8 of the Single Form

- (1) The proposed action includes arrangements to facilitate direct contact between those who retain the management and responsibility for ensuring the quality of the action and beneficiaries or other local stakeholders.
- (2) The action does not rely on third party monitoring provided by private firms or individual consultants that offer or have offered their services to military organisations or any other party to the conflict.

4. ASSESSING THE LONGER-TERM IMPACT OF REMOTE MANAGEMENT

The negative effects of remote management may only become apparent over an extended period, usually beyond a single implementation cycle. Many of the risks increase over time: needs assessments become outdated, risk levels can no longer be accurately assessed, and staff lose touch with the situation at implementation sites.

The longer humanitarian organisations rely on remote management to deliver assistance to civilian populations in an entire country or a particular sub-region, the greater the risk that aid will become less effective. In extreme cases, it may not even reach the targeted beneficiaries.

To address these issues:

- Grant/delegation agreements with partner organisations operating contexts where

ECHO considers that the conditions for having to resort to remote management prevail will include under Article 6.1 a specific clause on monitoring and reporting requirements. This clause will also need to be inserted by amendment in cases where remote management is proposed by a partner for an ongoing action, due to a change in circumstances that hinders or prevents direct implementation;

- Information on the possible implications of remote management in specific actions must be provided, particularly with regard to the preservation of EU financial interests, by the relevant ECHO staff and by partners at both proposal stage and in their reporting throughout the project cycle.

It should be recalled that according to Article 5 d) of the General Conditions for NGOs, the partner shall immediately inform the European Commission in writing in the event of it becoming aware of any corrupt, fraudulent, collusive or coercive practice or breach of the Specific Grant Agreement.

Systematic evaluations will also be carried out, applying methods that are conflict-sensitive and suitable for analysing the aggregated and longer-term effects of ECHO support. When feasible, ECHO will conduct such evaluations in collaboration with other donors and share the results with its operational partners.

ANNEX NO. 1: CHECKLIST FOR ECHO STAFF

TO ACCEPT A REMOTE MANAGEMENT COMPONENT IN AN ECHO-funded project:

- A.** Proposed actions that fail to fulfil the criteria of direct implementation are not normally eligible for ECHO funding. Where a partner submits a proposal whose implementation depends wholly or partly on remote management, each of the seven questions and linked criteria must be addressed in the Single Form, for it to be considered for funding.
- B.** When unforeseen changes in the operating environment entail a shift from direct implementation to remote management, while an action is ongoing, ECHO staff will use the same criteria to assess whether support should be continued.
- C.** Actions that do not fulfil all the criteria, but are nonetheless predicted to deliver substantial humanitarian benefits, may exceptionally be funded (or continue to be funded) but only after referral of the case by the head of the geographical unit concerned to the ECHO's Director of Operations for approval. The unfulfilled criteria must be specified, and a full description of the expected benefits provided, at the time of referral of the proposal to the Director of Operations.

1 - Is there an access problem due to security or administrative obstacles?

Specific assessment criteria applied by ECHO

Information for point (1) below to be found in section 3.1.3 "Problem and risks analysis" (or section 6.6 in case of security related access problems) of the Single Form.

- (3) It is clear that access problems that exist cannot be resolved by the partner, and that these are sufficiently serious to prevent humanitarian aid delivery unless a remote management approach is adopted.
- (4) In ECHO's own assessment, in the same geographical area(s) of implementation, no other humanitarian organisation eligible for ECHO funding, with the required capacity and experience, is willing and able to meet the humanitarian needs identified in the proposed action through direct management.

2 - Does the proposed action include acceptance-building measures?

Specific assessment criteria applied by ECHO

Information to be found in sections 4.3, "Results", 4.7 and 7 "Field Co-ordination" of the Single Form.

- (1) The proposed action identifies actors at local, provincial, national or international level who have or could have an impact on humanitarian access in the proposed geographic area(s) of intervention.
- (2) Where possible, the action includes concrete steps to gain, regain or maintain acceptance of neutral and independent humanitarian action.

3 - Is it a direct life-saving action or an action aimed at preserving crucial livelihoods?

Specific assessment criterion applied by ECHO

Information to be found in section 4 "Logic of intervention" of the Single Form.

The action subject to remote management is designed to implement direct, life- saving operations or operations aimed at preserving crucial livelihoods.

4 - Have all possible measures been taken to reduce the risk of losing the lives of those undertaking the work on the ground?

Specific assessment criterion applied by ECHO

Information to be found in section 6.6 "Security constraints" of the Single Form.

Remote management for security reasons can be contemplated only if the partner organisation provides clear evidence that all possible measures have been put in place to reduce and manage the risks for humanitarian workers implementing the action. Furthermore, the partner organisation will have to provide clear evidence that programmes are designed and delivered in a manner that does not impact negatively on the security of the beneficiaries/disaster affected communities.

5 - What is the source of the needs assessment in a remotely-managed action?

Specific assessment criteria applied by ECHO

Information to be found in section 3 "Needs assessment" of the Single form

- (1) The proposed action specifies which sources of information have been used to estimate needs.
- (2) In conflict-affected environments, data collected remotely (e.g. through national/local staff, external partners or aerial surveillance) have been confirmed through cross verification from direct sources (e.g. IDPs who have fled affected areas, traders or community representatives).

6 - Have robust systems been put in place to allow staff on the ground to provide all of the relevant information to those who are ultimately responsible for the management and the quality of the action?

Specific assessment criteria applied by ECHO

Information to be found in section 6.1 "Human resources and management capacities" of the Single Form

- (1) Steps have been taken to ensure that partner organisations' staff who are ultimately responsible for the management and the quality of the action are updated at all times with all relevant information concerning the implementation of the action on the ground.
- (2) The action identifies potential qualification gaps and explains where the necessary technical, analytical and managerial skills can be found. If skills' gaps have been identified, the proposal includes relevant training or other measures to address them.

7 - Are monitoring arrangements adapted for remote management?

Specific assessment criteria applied by ECHO

Information to be found in section 8 of the Single Form

- (1) The proposed action includes arrangements to facilitate direct contact between those who retain the management and responsibility for ensuring the quality of the action and beneficiaries or other local stakeholders.
- (2) The action does not rely on third party monitoring provided by private firms or individual consultants that offer or have offered their services to military organisations or any other party to the conflict.