# RAISING THE BAR:

Recommendations to Strengthen the GFF Minimum Standards for Country Platforms to Enhance Participation, Transparency, and Accountability

BY LAURA SOCHAS/AFRICA HEALTH BUDGET NETWORK & SUZANNA DENNIS/PAI







## **INTRODUCTION**

The Global Financing Facility (GFF) promises to leverage much-needed domestic and external resources for women's, children's, and adolescents' health. But it will do much more than this. Working through country platforms, the GFF will facilitate the drafting, monitoring and implementation of a single, collaborative strategy for reproductive, maternal, newborn, child and adolescent health (RMNCAH) and long-term financing. In this way, the GFF has the potential to influence country-level RMNCAH governance and power dynamics between stakeholders.

The GFF rightly avoids being overly prescriptive to allow for flexibility in country platforms. However, the relative lack of defined governance guidelines for country platforms has compromised the participation of less powerful stakeholders such as civil society organizations (CSOs) and undermined opportunities for accountability. For example, civil society advocates have faced considerable challenges engaging with the GFF in Tanzania.<sup>1</sup> Anecdotal evidence suggests similar experiences in the other frontrunner and 2nd phase countries. The process to finalize the minimum standards for country platforms presents an excellent opportunity to pave the way for strong and meaningful CSO engagement as the GFF becomes operational in a second wave of countries.

## ASSUMPTIONS AND METHODOLOGY

It is imperative that the minimum standards for country platforms reflect the principles of the entities behind the GFF: The Every Woman Every Child initiative, led by the United Nations Secretary General's office with involvement by the Partnership for Maternal, Newborn and Child Health and the World Bank. For this paper, we reviewed the core documents that define standards for inclusiveness and participation, transparency, independence, and accountability within the Global Strategy, the World Bank, and the GFF itself. Our guiding reference documents are:

- World Bank (2015) Global Financing Facility Business Plan, May 2015.<sup>2</sup>
- World Bank (2015) Global Financing Facility in Support of Every Woman Every Child: Country Platforms. Background paper for first Investors Group Meeting, September 2015.<sup>3</sup>
- Every Woman Every Child (2015) The Global Strategy for Women's Children's and Adolescents' Health (2016-2030), September 2015.<sup>4</sup>

- Schweitzer, J. (2015) Accountability in the 2015 Global Strategy for Women's, Children's and Adolescents' Health. Special Issue of the British Medical Journal on Women's, Children's and Adolescents' Health.<sup>5</sup>
- World Bank (2015) draft Environmental and Social Framework (or Safeguards), particularly ESF10. Stakeholder Engagement and Information Disclosure.<sup>6\*</sup>

## KEY FINDINGS AND RECOMMENDATIONS

We find that the strong focus on transparency, participation, and accountability in The Global Strategy, the World Bank Safeguards, and the GFF's own business plan is not adequately reflected in the proposed minimum standards for GFF country platforms. Drawing on these guiding documents, we recommend strengthening the minimum standards by expanding on the existing principles of inclusiveness and transparency, and adding principles of independence and accountability.

Here is a summary of our recommendations by principle:

- Inclusiveness and participation: Defining the GFF's key constituencies (which include CSOs); requiring democratic and transparent self-selection of CSO representatives to the country platform; and using stakeholder engagement plans to meaningfully consult outside the country platform. We also recommend having CSO observers to the country platform to enhance CSO engagement and bring complementary skills and resources.
- Transparency: Expanding and more clearly defining the types and timing of information that must be disclosed.
- Independence: Requiring a balance of members of the country platform responsible for implementing versus overseeing activities, to build oversight and accountability into the country platform itself.
- Accountability: Requiring an annual review of adherence to the minimum standards, and providing access to an effective grievance mechanism when they are not met.

"Underpinning our recommendations is the desire to enable country platforms to design, implement, and oversee Investment Cases that address the key issues faced by the country's women, children, and adolescents in a participatory way; and also to act as an accountability mechanism, keeping government, implementers, and other commitment makers to account for their progress on RMNCAH plans, strategies, and investments".

Strong and balanced country platforms also have the potential to direct GFF funds towards programs that adhere to strong principles of human rights in program implementation, such as those outlined in FP2020's Rights & Empowerment principles for family planning.<sup>7</sup>

## WHY INDEPENDENCE AND ACCOUNTABILITY?

The GFF business plan does not currently refer to the country platform as an accountability mechanism itself, but rather sees accountability resulting from the resultsbased framework, which is then publicly monitored implementers are not necessarily brought to account within the country platform:

"Another critical element of results-focused financing is transparency. Results are verified locally and are then typically made widely available. This strengthens accountability by allowing a broad set of interested parties including the intended beneficiaries of the financing—to track how funding has been used and to understand what results have been achieved at what cost." GFF Business Plan, p.5

\*The World Bank's Environmental and Social Framework (Safeguards) are designed to apply to World Bank funded projects. However, in the absence of specific guidance for engagement, transparency, and accountability in strategy development, the Safeguards should be adapted to apply to GFF engagement.

### What is Accountability?

We use the commonly accepted Commission on Information and Accountability definition of accountability as, "a cyclical process of monitoring, review, and action that emphasises human rights principles of equality, non-discrimination, transparency, and partnership." (BMJ, p.63).

This is a missed opportunity to strengthen national accountability within the country platform itself. The core components are already in place. GFF country platforms have a high-level mandate: they will be deciding on a country's RMNCAH strategy and will then be tracking and reviewing performance on it. Country platforms are already bound by some principles of transparency outlined in the current minimum standards, although we would like to see these further strengthened. Lastly, the GFF business plan already requires country platforms to include the key constituencies necessary for adequate accountability.

The addition of minimum standards setting an open and democratic selection process for CSO members, and specification regarding a numerical balance between "implementing" and "overseeing" partners would give country platforms greater internal diversity of views and roles, and build oversight and accountability necessary for strong programs into the Platform itself. Balance in membership also is also likely to enhance the quality of Investment Cases by increasing the likelihood that members will make informed decisions and push for changes in the best interest of women and children.<sup>8</sup>

A balanced country platform is critical, but may be insufficient to ensure mutli-stakeholder accountability

for RMNCAH at the country level. This should be explored as part of the Global Strategy 2.0 Unified Accountability Mechanism.

### CONCLUSIONS

In the following pages, we provide specific recommendations to "raise the bar," and bring the minimum standards for country platforms to a level consistent with the GFF Business Plan, The Global Strategy, and the World Bank's draft Safeguards. Applying these recommendations would also bring the GFF's minimum standards more in line with the FP2020 principles that must be respected, protected, and fulfilled in order to reach and sustain goals for meeting contraceptive needs.<sup>9</sup> Our specific suggestions and rationale are listed below. Annex 1 includes verbatim excerpts from our reference documents.

As explained in the 2014 report of the Independent Expert Review Group for the Global Strategy, the stakes are high: "The success of the post-2015 agenda will be judged by the way the current rhetoric on accountability is translated into mechanisms for robust and independent monitoring, transparent and participatory review and effective and responsive action."<sup>10</sup>

## SUGGESTED AMENDMENTS TO GFF BUSINESS PLAN ANNEX 6. "MINIMUM STANDARDS FOR COUNTRY PLATFORMS"

The bracketed numbers for each recommendation in the middle column matches the rationale in the far right column. The numbered notes in the rationale column refer to policy excerpts in the Annex.

#### BLUE: EXISTING TEXT RED: RECOMMENDED ADDITIONAL TEXT

PRINCIPLE	RECOMMENDATIONS	RATIONALE
Introduction	The GFF requires that all country platforms embody four key principles (in addition to respecting the overarching GFF principles described in Section 1): inclusiveness and participation, transparency, independence, and accountability. To support countries to operationalize these principles, the GFF has established	
Inclusiveness and participation	minimum standards that countries are expected to adhere to:	[1] Adding the word participation makes explicitly
	<ul> <li>Inclusiveness [1] and participation:</li> <li>[2] Key constituencies for the GFF will include: Government; Civil society (not for profit); Private sector; Affected populations; Technical agencies (H4+ and others); Multilateral and bilateral agencies, and foundations; [3] Parliamentarians, and health professional associations.</li> <li>[4] Members of the civil society, private sector, and affected populations</li> </ul>	<ul> <li>[2] GFF partners are identified elsewhere in the GFF Business Plan. It is important to identify them here, so the minimum standards can be a stand-alone document (See note 3: GFF Business Plan, p.22 and 23).</li> </ul>
	constituencies should be selected for membership of the country platform in a transparent manner, by their own self-identified constituency, and not by those involved in the implementation of the Investment Case.	[3] Parliamentarians and health professional associations are an essential part of the "full set of RMNCAH stakeholders" and bring "a distinct comparative advantage to the process": their influence and perspective will be essential in the drafting, implementation and oversight of the Investment Case (See note #2: GFF Business Plan, p.22).
	<ul><li>[5] Country platforms permit a number of non-member CSOs access to meetings and resources through observer status.</li><li>Participation inside the country platform implies full involvement of all key</li></ul>	
	<ul> <li>constituencies in the process of:</li> <li>Preparing the Investment Case and the health financing strategy, including attending meetings, receiving and contributing to the preparation of materials, determining the approach to quality assurance for the documents, and endorsing the final version.</li> </ul>	<ul> <li>[4] Transparent self-selection of members on the country platform by their own community is important to ensure that incumbents represent a constituency, and encourage them to act as a liaison to the larger community they represent.</li> </ul>
	Agreeing to changes to the Investment Case and/or health financing strategy in the course of implementation	[5] Observer status has been highly successful in bringing additional expertise and skills
	• Determining the approach to technical assistance and capacity building to support implementation of the Investment Case and health financing strategy	<ul> <li>to Global Fund Country Coordinating Mechanisms.</li> <li>[6] "The Borrower will develop and implement a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts. A draft of the SEP will be disclosed, and the Borrower will seek the views of stakeholders, particularly regarding the identification of stakeholders and the proposals for future engagement." (See note 14: ESF p.124)</li> <li>[7] This text is taken almost verbatim from ESF10, p.125-126. Also supported by language in the most recent country platform paper: "how stakeholder engagement is organised and managed is determined by the country platform in a transparent, inclusive and consultative manner." (Country Platform paper p.5)</li> </ul>
	Receiving and reviewing data about performance in the course of implementation	
	[6] Country platforms will develop and implement a Stakeholder Engagement Plan (SEP) for engaging with a broader range of stakeholders than are part of the country platform. A draft of the SEP will be disclosed, and the country platform, will seek the views of stakeholders that are not members of the country platform, on the content of the SEP.	
	[7] The country platform will undertake a process of meaningful consultation in a manner that provides stakeholders external to the country platform with opportunities to express their views on the GFF's proposed plans, financing arrangements, and monitoring, and allows the country platform to consider and respond to them. Meaningful consultation will be carried out on an on-going basis as the nature of issues, impacts and opportunities evolves.	
	One clearly indicated person from each country platform will be nominated to be a focal person, or a point of contact for information sharing and feedback.	

PRINCIPLE	RECOMMENDATIONS	RATIONALE
Transparency	Making public the following documents, [8] within a maximum of one month of them being approved by the country platform:	[8] Transparency depends on documents being shared within a reasonable timeframe, in order for them to be useful for advocacy or accountability efforts.
	<ul> <li>country platform:</li> <li>[9] Country platform operational procedures, covering: selection and replacement of members, minimum frequency of meetings, voting rules including quorums, Stakeholder Engagement Plan(s), sharing of information prior to meetings, sharing of information after meetings, frequency of reporting, etc.</li> <li>A list of members with names/designations and contact details alongside agreed roles and responsibilities should be publicly available.</li> <li>Minutes of meetings at which Investment Cases and health financing strategies were developed (including documentation explaining decisions around the prioritization of particular interventions/approaches)</li> <li>[10] Minutes of all further meetings, specifically logging agreed actions following implementation reviews of the Investment Case and health financing strategy, [11] including the results framework and the costed implementation plan</li> <li>Agreements between financiers about which elements each will cover</li> <li>Disbursement data from each financier</li> <li>Progress reports on the achievement of targets in the results framework, [12] compiled using high-quality, referenced evidence from different sources</li> <li>Evaluation reports [12], compiled using high-quality,</li> </ul>	<ul> <li>[9] "The accountability process needs to be transparent, () and independently verifiable" (BMJ, p.63). Without this, the accountability mechanism embedded in the country platform cannot be effective as there will be no rules to support accountability. Also supported by language in the most recent country platform paper "country platforms are underpinned by a negotiated and signed agreement by stakeholders that clarifies the scope and composition of the platform alongside roles and responsibilities" (Country Platform paper p.4). See also note 21: the country-level agreement should "highlight the membership with names/designations and contact details alongside agreed roles and responsibilities around the GFF process" (Country Platform paper, p.4)</li> <li>[10] This minimum standard relates to the "Review" and "Action" components of accountability, which follow the initial "Monitor." Without transparency about who has been assigned to do what in order to improve monitored performance, there can be no accountability. "Partners regularly review performance and use the country platform as a mechanism to coordinate implementation support in areas that are encountering challenges" (See notes #38, 42 and 45, GFF Business Plan, p.26; BMJ, p.61; BMJ, p.63).</li> <li>Note: "Joint monitoring of process, implementation and results is based on harmonised information and accountability, including joint annual reviews and reporting that define actions that are implemented and reinforce mutual accountability." (Note 31: Country Platform paper p.5)</li> <li>[11] "The combination of results-focused financing and improved measurement systems is a centrepiece of how the GFF contributes to strengthening accountability globally for RMNCAH results." (See note #24; GFF Business Plan, p.10)</li> <li>[12] "The institutions carrying out the accountability process should</li> </ul>
	<ul><li>referenced evidence from different sources</li><li>[13] Evidence used in writing progress and evaluation reports</li></ul>	[13] "Regular and open reporting: data, scorecards, reports, etc. should be accessible, usable, and verifiable by civil society, communities, and researchers." (See note #26, BMJ p.63)
Independence	<ul> <li>[14] There should be at least as many members of the country platform involved in the implementation of the Investment Case as the number involved in accountability.</li> <li>[15] Civil society and private sector constituents should be classified either as implementers or overseers. Government, multilateral and bilateral agencies and foundations, and technical agencies should be classified as implementers. Affected populations about do a generation of the plane if a do a generation.</li> </ul>	<ul> <li>14-15] The recommendations under this principle are important in order to ensure that the country platform avoids conflicts of interest as much as possible, and the accountability function has the requisite level of independence to be effective.</li> <li>See notes #44 and 47: "Accountability mechanisms should, if possible, be independent. Both real and perceptions of conflict of interest should be avoided. Accountability mechanisms should have established procedures to enable open and transparent engagement with key constituencies." (BMJ, p.62 and 63)</li> </ul>
Accountability	<ul> <li>should be classified as overseers.</li> <li>[16] An annual review of the adherence to the minimum standards above and to the country platforms' own operational procedures and Stakeholder Engagement Plan should be produced and made public.</li> <li>[17] Should any citizen of the countries where the GFF</li> </ul>	<ul> <li>[16] "Monitoring of accountability processes and engagement of key parties is also important." See note #26 and "Monitoring impact: the accountability mechanism themselves should be regularly reviewed," note #48, BMJ, p.63</li> <li>[17] It is essential for an impartial and clear recourse mechanism to be acroad in advance, in order for the accountability mechanism to be</li> </ul>
	is implemented, or any member of the country platform, hold a grievance related to the principles above not being respected, they will have final recourse to a designated person within the Investors Group, according to procedures drafted and made public by the GFF Secretariat.	agreed in advance, in order for the accountability mechanism to be effective. "The Borrower will respond to concerns and grievances of project- affected parties related to the environmental and social performance of the project in a timely manner. For this purpose, the Borrower will propose and implement a grievance mechanism to receive and facilitate resolution of such concerns and grievances." (Note 50, ESF, p.126-127)

## **ANNEX 1**:

Support for Participation, Transparency, and Accountability Within the GFF Business Plan; the Zero Draft Global Strategy 2.0; the World Bank Draft Environmental and Social Framework; and the 2015 BMJ Supplement on Women's, Children's and Adolescents' Health

#### INCLUSIVENESS AND PARTICIPATION

- In relation to the development of the Investment Case: "The GFF focus is on the objective—a rigorous analysis of data that enables an inclusive set of stakeholders to identify and prioritize the intervention that set a country on a course to achieving 2030 targets—not on a document." (GFF Business Plan, p.12)
- (2) "National governments lead the process [of GFF operations in the country platform] with the involvement of the full set of RMNCAH stakeholders, each of which brings a distinct comparative advantage to the process." (GFF Business Plan, p.22)
- (3) GFF partners include: "Government; Civil society (not for profit); Private sector; Affected populations; Technical agencies (H4+ and others); Multilateral and bilateral agencies, and foundations." (GFF Business Plan, p.22 and 23)
- (4) "The GFF approach is to build on existing structures while ensuring that these embody two key principles (in addition to respecting the overarching GFF principles described in Section 1): inclusiveness and transparency." (GFF Business Plan, p.24)
- (5) "The GFF expects country platforms to afford each of the constituencies in the RMNCAH response the opportunity to contribute fully to the development and implementation of RMNCAH programming based on their specific skills and areas of focus. This includes involvement in the process of preparing Investment Cases and health financing strategies, such as by ensuring that the full set of stakeholders is invited to consultations on the preparation of the Investment Case and health financing strategy, supplied with all of the relevant documentation needed to be able to contribute technically, and involved in finalizing the documents." (GFF Business Plan, p.24)
- (6) Minimum standards for "Inclusiveness: full involvement of all key constituencies in the process of:
  - Preparing the Investment Case and the health financing strategy, including attending meetings, receiving and contributing to the preparation of materials, determining the approach to quality assurance for the documents, and endorsing the final version
  - Agreeing to changes to the Investment Case and/or health financing strategy in the course of implementation
  - Determining the approach to technical assistance and capacity building to support implementation of the Investment Case and health financing strategy
  - Receiving and reviewing data about performance in the course of implementation." (GFF Business Plan, p.A24)
- (7) "The Bank recognizes the importance of early and continuing engagement and meaningful consultation

with stakeholders. The Bank will require the Borrower to engage with stakeholders, including communities, groups, or individuals affected by proposed projects, and with other interested parties, through information disclosure, consultation, and informed participation in a manner proportionate to the risks to and impacts on affected communities." (ESF p.19)

- (8) "Stakeholder engagement is an inclusive process conducted throughout the project life-cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project process, and is an integral part of early project decisions and the assessment, management and monitoring of the project's environmental and social risks and impacts." (ESF, p.122)
- (9) "The Borrower will identify the different stakeholders, both project-affected parties and other interested parties (The stakeholders of a project will vary depending on the details of the project. They may include local communities, national and local authorities, neighbouring projects, and nongovernmental organizations). As set out in paragraph 5, individuals or groups that are affected or likely to be affected by the project will be identified as 'projectaffected parties' and other individuals or groups that may have an interest in the project will be identified as 'other interested parties'." (ESF, p.123)
- (10) "Borrowers will engage with stakeholders throughout the project life-cycle, commencing such engagement as early as possible in the project process. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts." (ESF, p.123)
- (11) "Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation." (ESF, p.123)
- (12) "The process of stakeholder engagement will involve the following, as set out in further detail in this ESS (ESS10):
  (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place;
  (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders." (ESF, p.123)
- (13) "The Borrower will maintain a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not." (ESF, p.123)

- (14) "The Borrower will develop and implement a Stakeholder Engagement Plan (SEP)3 proportionate to the nature and scale of the project and its potential risks and impacts. 4 A draft of the SEP will be disclosed, and the Borrower will seek the views of stakeholders, particularly regarding the identification of stakeholders and the proposals for future engagement." (ESF, p.124)
- (15) "The SEP will describe the timing and methods of engagement with stakeholders throughout the life-cycle of the project, distinguishing between project-affected parties and other interested parties. The SEP will also describe the range of information to be communicated to project-affected parties and other interested parties, as well as the type of information to be sought from them." (ESF, p.124)
- (16) "The SEP will be designed to take into account the main characteristics and interests of the stakeholders, and the different levels of engagement and consultation that will be appropriate for different stakeholders. The SEP will set out how communication with stakeholders will be handled throughout project preparation and implementation." (ESF, p.124)
- (17) "The SEP will describe the measures that will be used to remove obstacles to participation, and how the views of differently affected groups will be captured. Where applicable, the SEP will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. Dedicated approaches and an increased level of resources may be needed for communication with such differently affected groups so that they can obtain the information they need regarding the issues that will potentially affect them." (ESF, p.124)
- (18) "When the stakeholder engagement with local individuals and communities depends substantially on community representatives, the Borrower will make reasonable efforts to verify that such persons do, in fact, represent the views of such individuals and communities, and that they are facilitating the communication process in an appropriate manner." (ESF, p.124)
- (19) "The Borrower will undertake a process of meaningful consultation in a manner that provides stakeholders with opportunities to express their views on project risks, impacts, and mitigation measures, and allows the Borrower to consider and respond to them. Meaningful consultation will be carried out on an ongoing basis as the nature of issues, impacts and opportunities evolves." (ESF, p.125)
- (20) "Meaningful consultation is a two-way process, that:
  - Begins early in the project planning process to gather initial views on the project proposal;
  - Encourages stakeholder feedback, particularly as a way of informing project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts;
  - c. Continues on an ongoing basis, as risks and impacts arise;
  - Is based on the prior and timely disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a culturally appropriate format, in relevant local language(s) and is understandable to stakeholders;
  - e. Considers and responds to feedback;
  - f. Supports active and inclusive engagement with

project-affected parties;

- g. Is free of external manipulation, interference, coercion, discrimination, and intimidation; and
- h. Is documented and disclosed by the Borrower." (ESF, p.126)
- (21) The country-level agreement should "highlight the membership with names/designations and contact details alongside agreed roles and responsibilities around the GFF process." (IG Background paper on Country Platforms, p.4)
- (22) "Involve women, children and adolescents and the organizations that support them in decision-making for health policies and programs that affect their health and well-being." (One of the Actions in the Global Strategy, p.61)

#### TRANSPARENCY

- (23) "Another critical element of results-focused financing is transparency. Results are verified locally and are then typically made widely available. This strengthens accountability by allowing a broad set of interested parties - including the intended beneficiaries of the financing - to track how funding has been used and to understand what results have been achieved at what cost." (GFF Business Plan, p.5)
- (24) "The combination of results-focused financing and improved measurement systems is a centrepiece of how the GFF contributes to strengthening accountability globally for RMNCAH results. The GFF further supports this by working with countries around the transparent public release of data relating to performance, building on the experience of HRITF. The global results framework also plays a key role in accountability (...)."(GFF Business Plan, p.10)
- (25) "Minimum standards for "Transparency: making public the following documents:
  - Minutes of meetings at which Investment Cases and health financing strategies were developed (including documentation explaining decisions around the prioritization of particular interventions/approaches)
  - The final Investment Case and health financing strategy
  - Agreements between financiers about which elements each will cover
  - Disbursement data from each financier
  - Progress reports on the achievements of targets in the results framework
  - Evaluation reports" (GFF Business Plan, p.A24)
- (26) "Regular and open reporting: data, scorecards, reports, etc, should be accessible, usable, and verifiable by civil society, communities, and researchers. Monitoring should increasingly focus on outputs/outcomes, rather than inputs. Monitoring is not just about data but includes qualitative issues and adherence to rights. Monitoring of accountability processes and engagement of key parties is also important." (BMJ, p.63)
- (27) "The institutions carrying out the accountability process should collect data from various sources. Health systems data as well as independent (for example, citizen collected) data on access, quality, and equity of health services should be reviewed." (BMJ, p.63)

- (28) "The information will be disclosed in relevant local languages and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs (such as, disability, literacy, gender, mobility, differences in language or accessibility)." (ESF, p.125)
- (29) "Additional information may need to be disclosed at key stages in the project cycle, for example prior to start-up of operations, and on any specific issues that the disclosure and consultation process or grievance mechanism have identified as of concern to stakeholders." (ESF, p.126)
- (30) "how stakeholder engagement is organised and managed is determined by the country platform in a transparent, inclusive and consultative manner," (IG Background paper on Country Platforms, p.5)
- (31) "Joint monitoring of process, implementation and results is based on harmonised information and accountability, including joint annual reviews and reporting that define actions that are implemented and reinforce mutual accountability." (IG Background paper on Country Platforms, p.5)
- (32) "Country platforms are underpinned by a negotiated and signed agreement by stakeholders that clarifies the scope and composition of the platform alongside roles and responsibilities." (IG Background paper on Country Platforms, p.4)

#### ACCOUNTABILITY

- (33) "(...) The GFF uses an array of mechanisms to support domestic resource mobilization. (...) One end of the spectrum are more informal approaches such as (...) work with civil society to promote the accountable and equitable use of public resources." (GFF Business Plan, p.17)
- (34) Roles of civil society in the country platform: "advocacy and social mobilisation; accountability to strengthen national responses; service delivery, particularly in hardto-reach areas, for vulnerable populations, and in fragile settings." (GFF Business Plan, p.22)
- (35) Roles of affected populations in the country platform: "advocacy and social mobilisation; accountability to strengthen national responses; unique insights into approaches to service delivery (e.g. based on user experiences." (GFF Business Plan, p.22)
- (36) "The GFF operates at country level through a multistakeholder process that builds on IHP+ approaches." (GFF Business Plan, p.22)
- (37) "To monitor implementation, the partners involved in the country platform track progress on the targets contained in the results framework of the Investment Case. Partners regularly review performance and use the country platform as a mechanism to coordinate implementation support in areas that are encountering challenges. The platform is also used to agree on approaches to evaluation and to share lessons learned. In addition to following up on Investment Cases, the partners involved in the country platform also examine the progress toward sustainable financing, including targets on domestic resource mobilization." (GFF Business Plan, p.26)

- (38) "The GFF supports the tracking of resource flows so as to be able to follow up on commitments around domestic resource mobilisation." (GFF Business Plan, p.26)
- (39) "Civil society will play an important role in accountability at both global and national levels, through the Investors Group, country platforms, and broader public dialogues. Different models for the social accountability function – which civil society is uniquely positioned to address- will be employed in different settings." (GFF Business Plan, p.32)
- (40) "Accountability is essential to accelerating progress for women's, children's and adolescents' health. It enables the tracking of resources, results and rights and provides information on what works, what needs improvement, and what requires increased attention. Accountability ensures that decision makers have the information required to meet the health needs and realize the rights of all women, children and adolescents and to place them at the heart of related efforts." (Global Strategy 2015, p.70)

"Promote multi-stakeholder engagement and cross-sector collaboration for follow- up actions at all levels. Health sector reviews involving all stakeholders can provide a platform for monitoring, review and action. Parliamentarians and civil society can monitor and hold governments accountable, thereby ensuring citizens' voices are heard. To ensure a transparent and independent review, an Independent Accountability Panel will prepare an annual report on the State of Women's, Children's and Adolescents' Health (see Box 7). (Global Strategy 2015, p.70)

- (41) "Governments, parliamentarians, decision makers and policy makers at all levels will create transparent monitoring and accountability mechanisms for resources, results and rights"; "Civil society at all levels will track progress and hold itself and all other stakeholders accountable for commitments." (Global Strategy 2015, p.80-82)
- (42) "Robust, country-led, multi-stakeholder, and participatory accountability processes, with independent review, unified reporting, and follow-up actions at all levels will be key to monitor and review progress and make the necessary policy adjustments to ensure success." (BMJ, p.61)
- (43) "Accountability compels a state to explain what it is doing, why and how. (...) At minimum, all accountability mechanisms must be accessible, transparent and effective." (BMJ, p.61)
- (44) "'The success of the post-2015 agenda will be judged by the way the current rhetoric on accountability is translated into mechanisms for robust and independent monitoring, transparent and participatory review and effective and responsive action' (iERG)." (BMJ, p.62)
- (45) "The accountability process needs to be transparent, freely accessible, and independently verifiable, with open access to data and scorecards." (BMJ, p.63)
- (46) "There needs to be much stronger linkages between the three parts of a rights based accountability framework: monitoring, review and remedial action." (BMJ, p.63)
- (47) "Accountability mechanisms should, if possible, be independent. Both real and perceptions of conflict of interest should be avoided. Accountability mechanisms should have established procedures to enable open and transparent engagement with key constituencies." (BMJ, p.63)

- (48) "Monitoring impact: the accountability mechanism themselves should be regularly reviewed." (BMJ, p.63)
- (49) "The Borrower will continue to engage with, and provide information to, project-affected parties and other interested parties throughout the life-cycle of the project, in a manner appropriate to the nature of their interests and the potential environmental and social risks and impacts of the project." (ESF, p.126)
- (50) "The Borrower will respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. For this purpose, the Borrower will propose and implement a grievance mechanism8 to receive and facilitate resolution of such concerns and grievances." (ESF, p.126-127)
- (51) "The grievance mechanism will be proportionate to the potential risks and impacts of the project and will be accessible and inclusive. Where feasible and suitable for the project, the grievance mechanism will utilize existing formal or informal grievance mechanisms, supplemented as needed with project-specific arrangements. Further requirements on grievance mechanisms are set out in Annex 1.
  - The grievance mechanism is expected to address concerns promptly and effectively, in a transparent manner that is culturally appropriate and readily

accessible to all project-affected parties, at no cost and without retribution. The mechanism, process or procedure will not prevent access to judicial or administrative remedies. The Borrower will inform the project-affected parties about the grievance process in the course of its community engagement activities, and will make publicly available a record documenting the responses to all grievances received; and

- b. Handling of grievances will be done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the needs and concerns of the project-affected parties. The mechanism will also allow for anonymous complaints to be raised and addressed." (ESF p.127)
- (52) "The Borrower will define clear roles, responsibilities and authority as well as designate specific personnel to be responsible for the implementation and monitoring of stakeholder engagement activities and compliance with this ESS." (ESF, p.127)
- (53) "Recognize the critical role of civil society organizations, academia, the business community, media, funders, and other stakeholders in holding each other and governments to account for health outcomes." (One of the Actions in the Global Strategy, p.49)

#### **ENDNOTES**

- 1 IPPF and RHSC. 2015. Global Financing Facility Country Consultation Fact Sheet: Lessons Learned from GFF Front Runner Countries – Kenya and Tanzania. http://globalhealth.org/wp-content/uploads/GFF-Country-Factsheet.pdf.
- 2 World Bank. 2015. Global Financing Facility in Support of Every Woman Every Child: Business Plan. http://www.worldbank.org/en/topic/health/brief/global-financing-facility-business-plan.
- 3 The World Bank. 2015. Global Financing Facility in Support of Every Woman Every Child Country Platforms. GFF/IG1/Background 2.
- 4 Every Woman Every Child. 2015. The Global Strategy for Women's Children's and Adolescents' Health (2016-2030). http://globalstrategy.everywomaneverychild.org/pdf/EWEC\_globalstrategyreport\_200915\_FINAL\_WEB.pdf.
- 5 Schweitzer, Julian. 2015. Accountability in the 2015 Global Strategy for Women's, Children's, and Adolescents' Health. The BMJ. http://www.bmj.com/content/351/bmj.h4248.full.pdf+html. This article is based on the work conducted by a working group convened by the governments of Tanzania and Canada to develop the accountability framework of the 2015 Global Strategy.
- 6 The Bank's Environmental and Social Framework will be finalized shortly. World Bank. 2015. Environmental and Social Framework: Setting Environmental and Social Standards for Investment Project Financing. Second Draft for Consultation. http://consultations. worldbank.org/Data/hub/files/consultation-template/review-and-update-world-bank-safeguard-policies/en/materials/clean\_ second\_draft\_es\_framework\_final\_draft\_for\_consultation\_july\_1\_2015.pdf.
- 7 FP2020. 2014. FP2020 Rights and Empowerment Principles for Family Planning. http://www.familyplanning2020.org/ resources/4697.
- 8 The positive reasons for having balance and diversity in a country platform (the CCM) are well articulated in: The Global Fund. 2008. Country Coordinating Mechanisms: Partnership and Leadership. Implementer Series. http://www.theglobalfund.org/documents/ccm/CCM\_2008ThematicPartnershipLeadership\_Report\_en.
- 9 FP2020. 2014. FP2020 Rights and Empowerment Principles for Family Planning. http://www.familyplanning2020.org/ resources/4697.
- 10 p.86, independent Expert Review Group on Information and Accountability for Women's and Children's Health. 2014. Accountability for Women's and Children's Health. http://www.who.int/woman\_child\_accountability/ierg/news/ierg\_2014\_report\_ launch/en.
- 11 The Global Fund. 2008. Country Coordinating Mechanisms: Partnership and Leadership. Implementer Series. http://www.theglobalfund.org/documents/ccm/CCM\_2008ThematicPartnershipLeadership\_Report\_en.

RAISING THE BAR: RECOMMENDATIONS TO STRENGTHEN THE GFF MINIMUM STANDARDS FOR COUNTRY PLATFORMS TO ENHANCE PARTICIPATION, TRANSPARENCY, AND ACCOUNTABILITY