Social Accountability Innovations in the NGO Sector in West Bank and Gaza

The Palestinian NGO Projects

Currently, about 1,500 of 2,445 registered nongovernmental organizations (NGOs) in the West Bank and Gaza (WB&G) provide key social services. Within this context, the World Bank has supported four Palestinian NGO Projects (PNGO), beginning in 1997, to: (1) enhance the capacity of Palestinian NGOs and community-based organizations (CBOs) to deliver social services to poor, marginalized, and geographically-isolated communities; (2) establish a sound and transparent management structure for donor grant funding with institutionalized project and financial management systems; and (3) assist in the development of the NGO sector through improved governance, transparency, and accountability as well as through cooperation and information-sharing among Palestinian NGOs, the Palestinian Authority (PA), and other entities. The current and fourth Palestinian NGO project (PNGO IV) is a landmark project in that it has integrated a series of innovative social accountability measures into its design, components, and activities. Such measures include social accountability indicators in the results framework, transparent and participatory subproject selection processes, and participatory planning and needs assessments to inform decision-making at multiple levels. PNGO IV also serves to strengthen the NGO sector overall through an NGO Code of Conduct, a compliance mechanism that provides incentives for NGOs to integrate good governance measures into their practices. These activities have contributed to more accountable and targeted social-service delivery, built-in incentives and capacity for improved NGO governance, and increased transparency and accountability of the project implementation entity—the NGO Development Center (NDC).

Context

At the turn of the 20th century, Palestinian charities started their activities, operating within the legal framework for nongovernmental organizations (NGOs) as stipulated in Ottoman law. The 1960s and 1970s witnessed a substantial proliferation of Palestinian NGOs (mostly charitable organizations operating regionally under Jordanian law) that provided social, educational, and medical services even after 1967 when the Israeli civil administration took over the primary responsibility for providing social services. The signing of the Oslo agreement in 1993 and the subsequent establishment of the Palestinian Authority (PA) in 1994 marked a new era where Palestinian NGOs redefined their role alongside the PA as the main provider of social services. Nevertheless, NGOs continue to provide essential social services that complement the PA, filling a crucial gap in both service coverage and funding.

Today, about 1,500 of the 2,445 registered NGOs in the WB&G provide the majority of social services (social protection, health, early childhood development, mental health, education, care for the elderly, support for people with special needs, and agricultural and environmental issues).1 With the establishment of the PA, and the substantial political and socioeconomic changes that followed, most donors supported the development of PA institutions for a future Palestinian state and Palestinian NGOs revised their strategies.2 As the volatile political and security situation in WB&G

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1. The Ministry of Health (MOH) refers patients to NGOs that provide 95 percent of early childhood development services and all specialized health services, including rehabilitation, cancer treatment, ophthalmology, and neurology. With regard to agricultural issues, NGOs play an important role in land reclamation, rehabilitation, and tree planting; these efforts have effectively limited land confiscations, protecting rural livelihoods.
2. Most NGOs primarily provide services, but some work on state-building and advocacy issues as well.

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The Palestinian Authority is committed to support and partner with civil society institutions. We acknowledge the contribution of the NGOs in the provision of essential social services in particular in the Gaza Strip, Jerusalem and areas where the public sector has difficulties to operate.

- Dr. Salam Fayyad, Palestinian Prime Minster at the closing ceremony of PNGO III, June 2011
Box 1. Social Accountability Definition and Context for WB&G

Social accountability is based on four conceptual building blocks: transparency, participation, response, and monitoring; in order for these measures to be effective, they must be implemented as part of a system. Transparency supports processes that enable access to information in the public domain, including systematic reporting on operations, budgets, programs, and priorities. Participation refers to a citizen’s right to participate in the decision-making process, including strategic planning, budget formulation, and a complaints system. Response refers to the capacity and willingness of institutions to identify and respond to the needs and preferences of citizens and to request citizen feedback. Monitoring is the systematic collection and analysis of information that enables stakeholders, as third-party monitors, to determine whether service providers are implementing their responsibilities according to the law.

Traditionally, social accountability refers to relationships between governments and NGOs, CSOs, service beneficiaries, and citizens. In the WB&G context, NGOs and CBOs deliver public services that are complementary to the PA and in areas where the PA has difficulty operating; in this context NGOs and CBOs are service providers.

continued, and as Israel imposed increasingly tighter restrictions on movement and access, the Palestinian economic space became fragmented and caused financial crises for the PA, causing ripple effects throughout the economy. Many Palestinians were deprived of their livelihoods and opportunities for future growth. Donors responded quickly with increased emergency assistance to the PA, but most of the resources were not directly channeled to NGOs providing the needed services.

It is within this context that, beginning in 1997, the World Bank supported a series of PNGOs3 to enhance the capacity of Palestinian NGOs and CBOs4 to deliver social services to poor, marginalized, and geographically-isolated communities; to establish sound and transparent management structures for donor grant funding (including institutionalizing systems for project and financial management); and to assist in the development of the NGO sector by promoting improved governance, transparency, accountability, cooperation, and information-sharing among Palestinian NGOs, the PA, and other entities. Since 1997, the Bank has invested US$33 million in the NGO sector through these projects, and has leveraged an additional US$26.6 million from other donors. Bank-supported NGOs provide social services that are in line with the priorities of and complement the social services provided by the PA, especially in Area C,5 East Jerusalem, and Gaza.

PNGO and PNGO II established a transparent grant-making system for NGOs delivering social services and promoted a culture of cooperation and information sharing among them. PNGO III consolidated and institutionalized these achievements with the establishment of the NDC, which emerged from the project implementation unit as an independent organization. The current and fourth landmark project, PNGO IV integrates a series of innovative social accountability measures into its design, components, and activities (see box 1).

The valuable lessons learned from these projects can provide guidance for implementing the World Bank’s most

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4. In this context, NGOs are institutions more formally registered with the Ministry of Interior with paid staff and a set governance structure. CBOs are typically volunteer-driven, smaller, and more localized than NGOs, and are not always formally registered.

5. As per the 1993 Oslo Agreement, the West Bank designated Area C (about 60 percent of the West Bank) is under full Israeli civil and military control.
Box 2. Aligning Project with Regional Strategy

PNGO IV reinforces the strategic direction outlined in the World Bank's latest MENA strategy (2011) and has proven success implementing two of its four main pillars: (1) socioeconomic inclusion and (2) government and institutions. This is demonstrated in the project development objective (PDO): “to provide social services to those who are poor, vulnerable, or marginalized through NGOs and to strengthen the institutional capacity of these organizations.” Intermediate outcome indicators focus on both the better targeting of NGO and CBO social-service delivery to poor and vulnerable groups across the Palestinian territories as well as on the strengthening of governance practices within NGO and CBOs. Community and beneficiary participation is integrated into all of PNGO IV-funded subprojects and beneficiary scorecards and satisfaction surveys have incorporated beneficiary feedback, operationalizing social accountability activities.

Box 3. PNGO IV Project Components

Component 1. NGO grants for social and productive services is a grant facility that provides four categories of subgrants (empowerment, mentoring, innovation, and emergency) to NGOs for social-service delivery and focuses on subsectors and themes for which NGOs and CBOs have a comparative advantage. These subgrants target poor and vulnerable groups who are socially marginalized, including people with special needs, youth, orphans, the elderly, poor farmers, women-headed households, and the geographically marginalized. Empowerment grants support experienced NGOs and CBOs to improve their service delivery; funds flow directly from NDC to NGOs and CBOs. Under mentoring grants, larger NGOs assist smaller NGOs and CBOs in their capacity building; funds flow directly from NDC to mentors. To ensure quality service delivery, NDC provides capacity building in financial management, procurement, and project management throughout the entire subproject cycle. As of May 2012, this component has benefitted a total of 24 NGOs, 34 CBOs, and 35,510 Palestinian end beneficiaries; 21,276 of these are served by NGOs and 14,234 by CBOs, reaching 36 percent of youth and 54 percent of women (of total beneficiaries).

Component 2. NGO sector development continues to promote responsiveness, transparency, and accountability from the NGO sector as a whole to Palestinian communities by setting standards, promoting knowledge-sharing and collaboration within the sector, and through strategic policy research and planning. Under this component, the project provides training to NGOs on various aspects of NGO good governance. The subcomponents are: (1) implementation of the Code; (2) NGO sector coordination and information exchange; and (3) policy and research. NDC is assisted by coaching and technical assistance (CTA) consultants, and therefore, funds typically flow through these intermediaries.

Component 3. Project management and monitoring and evaluation (M&E) aims to strengthen the capacity of the NDC (the implementing agency) for project management, M&E, and project auditing.

The project has in place well-established upward accountability mechanisms to funding partners, including annual reporting and financial management auditing, to ensure that project funds are efficiently managed. As part of PNGO III,
NDC successfully put into place several downward accountability mechanisms to gather feedback from constituents, NGOs, and CBOs, informing its decision-making at various levels. In March 2012, the World Bank conducted a half-day group exercise with the NDC to assess the main downward accountability relationships between key stakeholders (figure 1), highlighting the strength of each of these relationships and identifying key social accountability measures currently in place; the exercise also developed recommendations for addressing weak social accountability links and highlighted several areas within this accountability chain to guide NDC in further expanding its social accountability measures through future interventions.

The group assessment exercise concluded that the accountability relationships between NGOs/CBOs and citizen beneficiaries are strong because of specific measures in place—a transparent selection process, a participatory needs-assessment process, and the use of scorecards to gather feedback. Social accountability interventions between NDC and its partner NGOs/CBOs and its coaching and technical assistance (CTA) consultants are sufficient. They include processes for focus groups, quarterly review meetings, and quarterly progress report feedback collection. Social accountability interventions between CTA consultants and the NGOs/CBOs were also considered adequate (with specific mention of the participatory curriculum-development process). Finally, the direct relationship between NDC and citizens and the relationships of NGOs and CBOs with their mentor NGOs were judged to be areas requiring further strengthening (table 1).

“The score card is very useful and important for community. It motivates us, gets us involved in the project. Because of this we care more about how the project is run and how it impacts on our lives—it makes us more responsible.”

- Amina Mahmoud Manasra, Beneficiary, Agricultural Development Association (PARC)
Social Accountability Interventions in Project Design and Processes

PNGO IV includes a number of social accountability activities that have promoted better accountability in and targeting of social service delivery, built-in incentives and capacity for improved NGO and CBO governance, and increased transparency and accountability for NDC itself.

Social accountability indicators are integrated in and measured through the results framework. At the core of the PNGO IV design, 10 out of the 16 project- and intermediate-outcome indicators measure the social accountability aspects of project implementation (see table 2).

As of March 2012,7 some of the salient achievements include:

- Among subprojects under Component 1, 83 percent are identified through community participation;
- A substantial majority of NGOs (67 percent) are implementing 50 percent or more of good governance standards as defined in the Code;
- Among thematic networks, 75 percent actively consult member organizations and undertake actions that reflect demand, including direct lobbying and coordination actions with the PA; and
- 100 percent of the NGOs that have received training in the Code have made their financial statements public.

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7. As assessed during the PNGO IV midterm review mission in March 2012.
Beyond service delivery it is also clear that NGOs need to have high levels of accountability and transparency. In this regard the development of the Code of Conduct under the PNGO III has been a major achievement and is recognized as a model to set ethical guidelines and management standards for NGOs.

– Mariam Sherman, Country Director, World Bank

NGOs and CBOs subprojects have a transparent selection process in place in order to target key communities.

NDC applies transparent subproject selection processes, participatory planning, and needs assessments to inform its decision making. NDC employs a transparent process for selecting its subprojects and the CTA consultants to work with its partner NGOs. To maintain direct relationships with project beneficiaries (NGOs and CBOs) and communities, NDC solicits regular feedback from project-supported NGOs and CBOs through focus groups, quarterly review meetings, and quarterly progress reports—the latter have a specific section for subprojects to provide feedback to NDC. These efforts ensure that NGOs and CBOs have several avenues for providing feedback to NDC, guiding its practices at various stages in the project implementation decision-making. NDC conducts a beneficiary impact assessment once every three years, has a transparent document disclosure policy in place, and holds public hearings around its annual report.

Citizens participate in NGO and CBO subproject selection and implementation. PNGO IV has integrated beneficiary participation into all of its funded subprojects for social service delivery, from initial design to implementation. To receive project grants, subprojects must meet three criteria by which the extent and depth of community participation is assessed: the community must validate the subproject idea; the project must be identified with community engagement; and participation of the community in the identification and design of the subproject must be clear. Like NDC, some NGOs and CBOs subprojects have a transparent selection process in place in order to target key communities.

Participatory monitoring by citizens assesses and informs NGO and CBO service delivery. Communities benefiting from project services evaluate NGO interventions with a scorecard exercise in which the performance of NGOs and CBOs providing services is rated. The tool also includes the development of action plans to address any issues and to inform the NGOs and CBOs in a way that allows them to better respond to the communities. Capacity building is provided by NDC program officers and NGOs by accompanying NGOs in implementing this participatory monitoring system and provides resources for its undertaking. These monitoring activities have promoted downward accountability to the NGOs and CBOs that work with NDC as well as to the ultimate beneficiaries (see box 4). Additionally, NGO and CBO capacity on good governance is built through the 2008 NGO Code of Conduct (Code), which was formulated in close collaboration with 90 percent of Palestinian NGOs under PNGO III and was adopted by the League of Arab States in 2009. The Code identifies, for the first time, the values and principles by which the NGO sector should operate (annex 1),8 aiming to improve NGO accountability downward to the communities they serve and upward to the PA and donors. The Code is a statement by Palestinian NGOs that establishes professional standards for development work and processes for self-regulation. To date, almost 600 NGOs and CBOs have signed on to the Code, and 92 have received CTA from NDC to integrate its principles into the functioning of their respective organizations, using the code compliance mechanism.9

A code compliance mechanism is being piloted to provide incentives for NGOs and CBOs. PNGO IV is supporting the design and piloting of a compliance mechanism that would create incentives for NGOs and CBOs to better comply with the Code.10 This mechanism, currently in the design stage, will develop an NGO rating system that is agreed upon by NGOs and CBOs, the government, and donor agencies. The rating tool will involve two steps: first, the NGO or CBO will rate its performance in a self-assessment exercise, and then an accredited independent institution will be tasked with validating the rating.11 This type of objective rating system

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8. Six of the 12 Code principles relate to social accountability: participation, transparency, accountability, equality and inclusiveness, good governance, and of conflict-of-interest prevention.
9. Seventy-seven NGOs and CBOs were supported by PNGO grants and 15 were supported by an EU grant.
10. Once the code compliance mechanism is finalized under PNGO IV, it will need to be rolled-out.
11. The accreditation process would be similar to the ISO certification system in which institutions performing the ISO compliance audit are accredited by ISO.
Box 4. Participatory Monitoring through Scorecards

PNGO IV uses the scorecard tool to enhance downward accountability and increase transparency. The scorecard helps to provide feedback on the implementation and alignment of project activities with the needs of beneficiaries (who are often from marginalized communities). The NGO, with the support of NDC, organizes an average of three scorecard sessions during the subproject cycle. The first baseline scorecard session, conducted immediately after the subproject is approved, sets a baseline and generates indicators selected by beneficiaries. Next is the midterm session, during which baseline session participants, to whatever extent feasible, rescore the subproject according to the baseline session indicators. In the final post-assessment session, beneficiaries score and reevaluate selected indicators and discuss the project’s achievements and results. Since March 2012, a total of 27 scorecard sessions have been conducted by NGOs that have received empowerment and mentoring grants (component 1), with help from PNGO IV project staff.

NDC first used the scorecard technique under PNGO III in 2007. An introductory session on the scorecard tool was held for mentoring NGOs; they were given comprehensive information about preparing and conducting scorecard sessions for their respective CBOs and end-beneficiaries. As part of capacity-building efforts, NDC will continue to support mentoring NGOs carrying out their first scorecard sessions.

The project management information system (PMIS) captures disaggregated data for more targeted service delivery and continuous subproject monitoring. Under PNGO III, a PMIS was developed to capture information on the subproject cycle from application stage to closure. The PMIS allows for data disaggregation by multiple factors including gender, region or city, vulnerability, and age group. This provides detailed analyses that allow for the appropriate targeting of social-service delivery. For example, with the use of the PMIS, NDC can report that more than 54 percent of PNGO IV beneficiaries are women and more than 36 percent are youth. Additionally, NDC project officers monitor the subproject implementation of NGOs by conducting monthly or biweekly field visits. Finally, all PNGO IV-supported NGOs/CBOs and CTA consultants provide feedback to NDC (mentioned above), which is entered into the PMIS. PNGO IV is currently integrating data from the scorecard action plans into PMIS to further improve the monitoring efforts.

Results So Far

Social services are being delivered to marginalized communities in a way that complements PA efforts. Seventy percent of NGO and CBO subprojects supported under PNGO IV reach the most vulnerable and marginalized population groups, validating the Bank’s approach of supporting basic social service provision to Palestinians through registered NGOs and complementing the PA’s efforts throughout the Palestinian territories, including areas isolated by the Separation Barrier.

An NGO portal supports transparency in the NGO sector. An online portal (the first of its kind in the region) called Masader (www.masader.ps) was supported by PNGO II and provides a platform for NGOs and CBOs to publicly display information about their activities, including projects, studies, and proposals, as well as administrative records and financial reports. The scorecard scores and feedback from the NGO and CBO quarterly progress reports will soon be posted on the portal. It is a valuable resource for governmental, private, academic, and media institutions and provides donors with relevant information to guide funding decisions. Masader is self-funded by the 822+ member NGOs and CBOs that must subscribe to use the platform.

12. As of October 2011, the portal had 4,800 users and 1,217 publications posted.

13. Poor and vulnerable groups are defined as living in governorates with high levels of poverty (according to the Palestinian Central Bureau of Statistics).
The quality of NGO social-service delivery and the development of the NGO sector is enhanced. Following the project’s capacity-building efforts, beneficiary NGOs and CBOs are mainstreaming transparency and good governance procedures and are instituting guidelines for financial management, procurement, reporting, and monitoring in their overall operations. While some NGOs and CBOs were initially reluctant to follow complex procurement procedures, they now value them highly and consider them as comparative advantage. As a result, 100 percent of the NGOs that received training in the Code have made their financial statements public. NGOs and CBOs report that PNGO IV has helped to significantly improve their overall management and performance, to boost their credibility with the communities they serve, and to increase their sustainability by leveraging additional donor funds. Fifty percent of poor and vulnerable population groups report improvement in the delivery of social services.

Subproject selection is driven by civil society, not by donors. Since subprojects are selected based on NGO and citizen needs rather than on donor priorities, and since the project selects subprojects in an unbiased manner, NGOs and CBOs hold a favorable view of PNGO IV, noting that the project supports Palestinian civil society through a programmatic development approach rather than an ad hoc, aid-based, or short-term one.

Lessons Learnt So Far

Grant utilization is more effective when coupled with capacity building. NGOs and CBOs have endorsed this combined approach as an effective model for delivering quality services and enhancing good governance. Project management and implementation systems should facilitate this holistic, synergistic approach among project components by empowering NDC staff to act as ambassadors for the entire project.

Communication beyond project beneficiaries is essential for sustainability. A more strategic, targeted, and effective communications strategy with the PA, donors, the private sector, philanthropists, and other stakeholders, is needed to better leverage support for NGO programs. In other words, the full potential of the PMIS as a project management decision-making and communication tool should be realized.

Box 5. Examples of Social Accountability Practices in NDC Partner NGOs and CBOs through Mentoring and Empowerment Grants

Agricultural Development Association (PARC). Socioeconomic Development through Livestock Organizations in Hebron Governorate (mentoring grant). The subproject’s launch and selection criteria were publicly announced in each village center. The project also formed a committee comprised of various community stakeholders and CBOs to review the NGO and CBO partner applications and to agree on the beneficiary list and the subproject.

MAAN Development Center. Preparing Today’s Youth for Tomorrow (mentoring grant). A scorecard session allowed youth volunteers to engage in the subproject design, including deciding on specific M&E indicators. This led to their taking ownership of and responsibility for the delivery of the subproject objectives.

Elderly Home Charitable Society. Distinctive Day Care for the Elderly in Jenin and Locations Affected by the Wall (empowerment grant). The subproject held preparatory meetings with volunteers, village councils, Al Quds University, and NGOs to incorporate their ideas and experiences into the subproject. A consultative process indicated that there was a high demand; this resulted in the expansion of the subproject from 10 to 11 villages. A participatory approach yielded 75 volunteers, a substantial increase from the original 50, including a number of village council chairpersons.

Mothers’ School Society. Educational Classes for Women (empowerment grant). The Mothers’ School Society has conducted regular meetings between beneficiaries (often at their request), the Ministry of Education, and school officials from relevant localities. Input from beneficiaries inform education plans and the framework of subproject implementation efforts. One recent meeting resulted in 40 mothers from Hiwara donating NIS 7,000 toward the establishment of a new classroom for students with learning disabilities at Omar Ibn Al Khatab Primary School. The high demand from the participating mothers resulted in an increase in class capacity, allowing for the accommodation of students from neighboring villages.

Psychosocial Center for Women. Rehabilitation Project for Female Victims of Social Violence (empowerment grant). The project held preparatory meetings between beneficiaries, the broader local community, other NGOs, and local companies to guarantee inclusive development in the subproject. A community workshop has resulted in three beneficiaries being employed by local companies.
Upward and downward accountability are essential components of effective and efficient social-service delivery. Challenges involved in creating systematized links and promoting cooperation between NGOs, PA, municipalities, the private sector, citizens, and other stakeholders must be addressed to allow for a more comprehensive approach to development problems.

Innovation and flexibility in project implementation is important within a conflict environment, as was visible during the closure of Gaza where both the Bank and NDC used innovative approaches to continue project implementation despite travel restrictions, power outages and fuel shortages.

A programmatic approach through a project series supports institutional change over time, but expectations for “quick wins” need to be managed. The success of the PNGO projects is partly due to the fact that they are part of a series, with each new project expanding and building upon the experiences, achievements, and challenges of its predecessor.

The Way Forward

Under PNGO IV, NDC is exploring the potential for further strengthening its downward accountability relationships with citizens by (1) proactively disseminating information about NDC’s programs; (2) ensuring that existing activities to promote social accountability in the Palestinian territories are implemented uniformly and consistently by standardizing procedures (with checklists, guidelines, and regular monitoring); and (3) expanding the scorecard participatory-monitoring approach to other PNGO IV components, including the mentoring grants and, when possible, encouraging PNGO IV-supported NGOs to scale-up the use of the scorecard tool to programs not supported by PNGO IV.

It is critical that the piloted code compliance mechanism be successfully implemented to ensure that it is promoting NGO compliance with good governance standards; this process must also be demonstrated to the end-users of NGO/CBO-provided social services.

A more integrated and comprehensive response to development challenges should be taken to better address the complexities of a conflict environment. This includes a move from emergency to development approaches and partnership between multiple stakeholders to address development problems through vertical sector integration and holistic or cross-sectoral approaches. Several PA ministries have expressed interest in and support for future collaboration with NGOs and CBOs for the provision of social services in areas where they cannot operate.

References


NGO Development Center Website: www.ndc.ps.
NGO Portal Website: www.masader.ps.


Annex 1. Social Accountability Principles in the NGO Code of Conduct

The NGO Code of Conduct has 6 out of 12 principles that directly relate to social accountability. The following is a summary of the key points of those principles.a

**Principle 3: Participation**
- NGO’s commitment to apply the principle of participation to consolidate voluntary and community contributions.
- Regular consultation with the beneficiaries to ensure involvement and transparency.
- Beneficiaries are involved in the design, monitoring and evaluation of projects.
- Data and expertise exchange is facilitated through continued consultation with stakeholders.

**Principle 5: Transparency**
- NGO’s commitment to ensuring that beneficiaries, public, concerned official parties and donors have access to information.
- Clear policies on disseminating and providing accurate information to the public are in place.

**Principle 6: Accountability**
- NGO’s commitment to provide any required information related to its operation with all the detail.
- NGO acts to provide a complaint system and an accredited accounting and auditing system and utilize funds according to earmarked and announced standards.

**Principle 7: Equality and Inclusiveness**
- NGO’s commitment to deal with all persons or groups, on the basis of their being alike with equal opportunity and not to discriminate on the religious, political, clannish, geographic, gender, social background or handicap basis in any form.
- NGOs could exercise some form of positive distinction in favor of certain marginalized groups, women or those with special needs or in geographic isolation according to a disseminated policy that is in line with the public interest.

**Principle 8: Good Governance**
- NGO’s commitment to the principle of good governance and democracy, ensuring functioning effectively at the level of the general assembly, management and staff. Specifically, some principles that the NGO is bound to are:
  - Maintaining the NGO as completely independent in its decision-making.
  - Developing manuals explaining proper procedures in management, finance, operations, monitoring and evaluation.
  - Consolidating the concept of management through participation and enhancing the sense of ownership of the staff and beneficiaries.
  - Ensuring that the programs respond to actual community needs rather than the agenda of the donors and that they have no negative impact on the community.

**Principle 9: Prevent Conflict of Interest**
- Conflict of interest surfaces when a person in a position of responsibility within an institution finds a way to promote personal, clannish or factional self interests. The Boards should make sure that procedures are in place and these procedures should be implemented in full transparency.
- All management members should declare all financial or personal interests and their nature. In such cases, where his or her interests are involved, he or she should refrain from the process of decision-making, unless there is a special exception to that.

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