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# Collective Accountability in Civil Society: the African picture

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## Executive Summary

Civil Society Organisations (CSOs) and Non-Governmental Organisations (NGOs) in Africa have the potential to make significant gains in poverty reduction, good governance and greater human rights protection within their societies. However, in their attempts to realise this potential, African CSOs face a number of challenges, the most significant being a perceived lack of legitimacy and unhealthy competition both from within and out-with the sector. This paper reviews a key tool that African CSOs are currently using to overcome these challenges: collective accountability initiatives (also known as self-regulatory initiatives or voluntary accountability schemes). There is currently very little comparative research available on the structure of African civil society or the nature of CSO collective accountability initiatives in Africa. Existing work points to the need for more information about the forms of self-regulation in African civil society and about best practices for designing an effective collective accountability initiative (CAI).

Drawing on prior research by the One World Trust and on new interviews with leading African accountability practitioners, this paper contributes to the budding areas of research on CSO self-regulation and accountability, and on African civil society more generally. It provides a survey of the types and structure of CSO collective accountability initiatives in Africa, comparing these to other Southern CAIs to identify principles of effectiveness and accountability that are common across African civil society. Findings from primary research with accountability practitioners are brought in to investigate how the differences revealed by this comparative exercise appear to be shaped by challenges specific to African civil society. The paper thus aims to contribute to a shared understanding of the potential value of CAIs in Africa by answering the following questions:

- What, if anything, is regionally unique about collective accountability amongst African NGOs/CSOs?
- How is collective accountability supporting African NGOs/CSOs to improve their accountability and performance?
- What are the key aspects of CAI design that should receive attention by those wishing to establish an initiative in the African context?

Findings indicate that collective accountability can help African NGOs and CSOs in the following three areas:

- **Increased legitimacy in the eyes of multiple stakeholders**
- **Building resources & capacity**
- **Improved CSO cooperation and collaboration**

The authors conclude with a set of priority recommendations for each of these areas, arguing that:

**Priority recommendations 1 & 2:** Collective accountability initiatives will increase legitimacy if they are designed using a structured approach to identify credibility gaps and a clear consultation process with clients/beneficiary groups;

**Priority recommendations 3 & 4:** Collective accountability initiatives will build CSO resources and capacity more effectively if they are used as a platform for collective fundraising and if they are paired with a strong marketing approach to build ‘branding’;

**Priority recommendations 5 & 6:** Collective accountability initiatives can improve cooperation and collaboration within the CSO sector if they are designed through consensus across a well-defined user group of CSOs and if they deliver tangible gains.

## Introduction

The rise of the accountability<sup>1</sup> agenda across civil society in recent years is evident in the increase of CSO/NGO<sup>2</sup> collective accountability initiatives (CAIs): collective efforts in which organisations come together at national, regional and international levels to develop common norms and standards (Lloyd and Warren 2009)<sup>3</sup>. These initiatives are seeing an expansion across multiple programmatic areas, types of organisation and geographical boundaries. One of the most salient examples of the last is Africa, where prior research by the One World Trust has identified at least 40 national-level CAIs and several regional-level initiatives (Lingan et. al 2010).

The proliferation of CAIs across Africa suggests that accountability concerns are endemic in civil society of the continent. This is not surprising given the growth of the civil society sector in Africa. One driver of this growth has been the investment of large sums of money from international donors. This has created opportunities for a few civil society organisations to deliberately misuse funds, generating calls for some means to regulate them. Another feature of modern African civil society is the tension that often marks the civil society-state relationship, a tension fuelled by state perceptions of CSOs as political opponents or competitors for foreign funding. In many instances, governments have justified attacks on civil society by pointing to their lack of

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<sup>1</sup> The One World Trust defines accountability as ‘...the process through which an organisation actively creates, and formally structures, balanced relationships with its diverse stakeholders, empowering these to hold it to account over its decisions, activities and impacts, with a view to continuously improve the organisation’s delivery against its mission,’ (Pathways to Accountability II, One World Trust 2012).

<sup>2</sup> Civil society is defined as a space where citizens collectively assemble to share concerns and mobilise around particular issues and affairs. Civil society organisations include faith-based associations, labour movements, local community groups and non-governmental organisations (NGOs) (Adopted from *Pathways to Accountability II*, One World Trust 2012).

<sup>3</sup> The terms ‘self-regulatory initiative’ and ‘collective accountability initiative’ can be used interchangeably, as they refer to the same practice of self-initiated and self-governed application of norms or standards by CSOs/NGOs to themselves. This paper is part of the One World Trust’s series of briefing papers on CSO accountability and draws on the One World Trust’s database of self-regulatory initiatives (for more, see: <http://www.oneworldtrust.org/csoproject/cso/resources>) . At its launch in 2009, this database was the first of its kind. Since its creation, self-regulatory approaches to accountability have become increasingly common and received growing attention within the CSO/NGO sector. The One World Trust has found that ‘collective accountability initiatives’ has become a more common way of referring to these initiatives and therefore adopts that phrasing in this paper.

accountability. The history and context of civil society in relation to institutions of governance is thus an important factor in shaping demands for accountability in African CSOs.

Despite the rise in the number of collective accountability initiatives in Africa, research on the topic has been limited to references in research focused on state-civil society relations, a few descriptive case studies, and one wider regional research project. This paper adds to this nascent body of work in three ways. First, it presents a survey of CSO collective accountability initiatives in Africa, bringing together information on the wide range of CAIs present in the continent today, including the types of schemes in existence, the standards and principles they promote, and the compliance mechanisms they employ. Secondly, it provides a comparative analysis that reveals differences in the composition of African CAIs compared to other lower- and middle-income country initiatives. Thirdly, it identifies potential explanations for these differences through interviews conducted with key informants from four CAIs across West and East Africa: in Cameroon, Kenya and Sierra Leone. Taken together, these sections provide a picture of what CSO collective accountability in Africa looks like today and what challenges these schemes are trying to address, answering the following key questions:

- What, if anything, is particularly distinctive about collective accountability amongst African NGOs and CSOs?
- How is collective accountability supporting African NGOs and CSOs to improve their accountability and performance?
- What are the key aspects of SRI design that should receive attention by those wishing to establish an initiative in the African context?

## **1. Background: The accountability challenges of a growing civil society in Africa**

The past three decades have seen a widespread increase in the numbers of civil society organisations, their resource base and their influence in Africa. To illustrate, the number of non-governmental organisations (NGOs)<sup>4</sup> in Kenya increased from 500 in 1990 to 3,200 in 2004 (National Council of NGOs 2003, quoted in Gugerty 2010b). This rapid rise in the number of CSOs has had major implications for civil society accountability.

The growth of African civil society has been driven by a number of factors, some mirroring an international trend of rapid growth in civil society, and some related to changes in Africa's political landscape particularly. Globally, the 1980s saw development policy shift away from the conventional perspective that placed the state at the centre of development processes. Civil society organisations, particularly NGOs, found favour in the search for institutional alternatives both because of their association with popular participation and because of an international trend towards privatising development interventions (Bratton 1989, Robinson 1995). From the 1980s

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<sup>4</sup> A subset of civic organisations defined by the fact that they are formally registered with government, they receive a significant proportion of their income from voluntary contributions, and are governed by a board of trustees (Adopted from Pathways to Accountability II, One World Trust 2012).

onwards, donors began to increasingly provide support to civil society groups, both directly and indirectly, channelling substantial amounts of aid through them (Hammad and Morton 2011).

In Africa, these trends played out in the context of historically strained relations between the state and civil society. The post-colonial period in Africa saw a handover of large state institutions from colonial to nationalist parties. One outcome of this was a restriction in political space as nationalist leaders tried to co-opt independent organisations into state parties in an attempt to impose unified control over their territories and build a sense of nationhood (Bratton 1989, Opoku Mensah 2008). Against this backdrop, the global trend towards providing development assistance through CSOs further complicated civil society's relations with the state throughout the 1980s and onwards. The shift from supporting governments to supporting CSOs was even more marked in Africa, where economic decline and mismanagement under the statist regimes prompted donors to gravitate towards civil society as the preferred conduit for development assistance. Civil society organisations were also seen by donors as being able to improve governance in Africa by holding state institutions to account.

The reallocation of foreign assistance, which comprises a larger proportion of public revenue in Africa than anywhere else in the world, was read by many governments as a loss of a funding source important for building political support and staying in power (Bratton 1989). This, along with the positioning of civil society organisations as advocates for more accountable governance, led some African governments to perceive civil society organisations as political opponents and economic threats. Although political liberalisation across much of Africa in the 1990s saw a further legitimisation of civil society, state restriction of CSOs has continued in many countries, with a sharp rise in restrictive legislation observed since 2008 (Moyo 2010; ICNL 2011).

Attempts by the state to control or restrict civil society vary across African countries, and are shaped by a number of factors. As organisations have expanded their role in delivering key services and influencing public policy (Moyo 2010; Wamucii and Idwasi 2010), they have come into more direct confrontation with the state, particularly over their human rights and advocacy work. Many African governments question whether such groups are carrying out local agendas, or whether they are in fact representing foreign interests in Africa (Matanga 2010). While these accusations are not unheard of elsewhere, African governments appear to be particularly sensitive on matters of state sovereignty (Bratton 1989). The continuing decentralisation of service provision, and the resultant shrinking of the state's remit and political control, have also sustained a sense of antagonism between governments and civil society organisations in many countries (Moyo 2010). State-civil society relations are by no means unanimously negative across Africa, but this brief history gives a sense of the tensions that commonly shape interactions between the two.

Another development accompanying the rapid rise of African civil society has been an increase in public scandals involving civil society groups. While this is in no way purely an African problem (Naidoo 2004), African CSOs have come under fire for incidences of corruption, financial mismanagement and the existence of 'briefcase NGOs': sham organisations set up to attract funds (Kwesiga and Namisi 2006: 87). Some African CSOs have also been criticised on the grounds that they are disconnected from the communities they are meant to serve, a problem compounded by their concentration in urban areas (Opoku Mensah 2008).

These developments have brought simmering questions of civil society accountability into focus in many African states. Some governments have raised concerns about the legitimacy of CSOs, sometimes taking these accusations as entry points to introduce controlling legislation (Kwesiga and Namisi 2006). Corruption and the use of the CSO legal structure by individuals seeking personal financial gains have provided fuel for critics' attacks on civil society work, and caused concern amongst donors regarding how their money is being used (DENIVA 2006). These pressures have been creating mounting concern within civil society to display greater accountability. As Opoku Mensah observes, "[...] the challenge of accountability remains the key challenge for civil society" in Africa (Opoku Mensah 2008: 12).

In response to these challenges, African CSOs have increasingly sought to develop collective accountability initiatives as a mechanism for improving their accountability and strengthening their relationships with key stakeholders. The next section provides an overview of CAIs as a form of not-for-profit accountability, as well as some background on their emergence in Africa more specifically.

## 2. Civil society CAIs as accountability mechanisms

Collective accountability has emerged as a particularly important means of improving accountability amongst civil society organisations (Hammad and Morton 2011)<sup>5</sup>. Naidoo identifies collective accountability mechanisms as by far the most predominant response by CSOs to the challenge of regulating CSO activity and improving public accountability (Naidoo 2004: 22). This is affirmed by the One World Trust's research, which has identified over 350 civil society self-regulatory initiatives, or collective accountability initiatives, worldwide.

The One World Trust's broad definition of collective accountability captures a wide array of mechanisms being used by civil society to regulate its own actions. This categorisation includes:

- **Codes of conduct and ethics**, which usually consist of a set of basic principles to guide the behaviour of an organisation.
- **Certification schemes**, which can be self, peer or third-party assessments of compliance with principles or standards.
- **Information services**, which increase transparency by sharing information about CSOs with the wider public. The type of information shared can vary from simple directories to information on CSO activities, administration costs, etc.

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<sup>5</sup> It is important to note that a collective accountability initiative, while being an accountability mechanism in and of itself, subsumes a number of other mechanisms in actual operation. For example, a code of conduct may include a clause to implement whistleblower protection policies, or a commitment to involve clients in all stages of policymaking. A number of self-regulatory initiatives also include reporting and disclosure requirements (see the One World Trust's database self-regulatory initiative, available at [www.oneworldtrust.org/csoproject](http://www.oneworldtrust.org/csoproject)).

- **Working groups**, which are peer organisations that come together on a regular basis to discuss, share and define best practice on a particular issue.
- **Self-assessments, toolkits and guides**, which encourage the adoption of best practice.
- **Awards schemes**, which seek to identify, highlight, and reward good practice.

(adopted from Warren and Lloyd 2009)

The widespread use of collective schemes to improve accountability is partly due to features unique to civil society that make traditional regulation of the sector very difficult. These include the difficulty of creating definitive rules and regulations in a sector that features a huge variety of organisations involved in different types of activities (Harriss-Curtis 2002), as well as a need to balance between flexibility, innovation and rigour. Collective accountability may be better able to meet these needs under certain situations in comparison to formal state regulation. There is also a possibility that formal regulation from the state can distort the state-organisation relationship to one of politicisation and patronage (Edwards and Hulme 1995: 14), or can strain public resources in a manner that is unsustainable (Batley 2006: 245). While the use of self-regulation by CSOs in a particular country or region may also be motivated by other reasons (as in the case of Africa, presented below), these arguments illustrate why collective accountability initiatives may be, in general, preferable over state regulatory laws and frameworks as a means of achieving improved civil society performance and accountability.

### ***Collective accountability initiatives in Africa***

The suitability and use of CAIs for the not-for-profit or civil society sector has been studied extensively in developed country contexts (Chisholm 1995, Bothwell 1999, Dale 2005, Bies 2010), but is a relatively understudied concept in the context of lower and middle-income countries. While the One World Trust's research has identified 90 initiatives in use in civil societies across 54 developing countries (Lingan et al. 2010), country or regional level analyses exist for only a handful of CAIs<sup>6</sup>.

While these studies are useful to understand what motivates the creation of collective accountability initiatives across individual developing country contexts, they are limited in scale, and do not capture broader trends in accountability practice across regions. This points to a gap in the literature where there is a need for strong comparative analyses of collective accountability initiatives as a CSO accountability mechanism across different contexts. This gap is particularly evident for a region in which collective accountability is quickly expanding: Africa.

### ***Collective accountability initiatives***

Africa has the largest collection of collective accountability initiatives as a region (35 out of the 90 initiatives identified by Lingan et al. 2010); a surprising phenomenon in a continent with a long-

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<sup>6</sup> See Golub (2006) for an account of CAIs in the Philippines, and Karim (2005) for a similar study on Bangladesh (Karim 1995). Mark Sidel provides country-level research on CAIs in India (Sidel 2005) and an overview of CAIs in India, Cambodia, the Philippines and Pakistan (Sidel 2003), as well as a regional analysis of CAIs in the Asia Pacific in Sidel (2010).

standing reputation for weak institutions (Gugerty 2010). Despite the dynamism of self-regulation on the ground, the literature on African collective accountability, much like the empirical literature on African civil society (Opoku-Mensa 2008), is sparse. Much of the existing studies present information on a limited number of CAIs, and the focus of the analyses is on country-specific regulatory contexts.<sup>7</sup> While important in understanding the evolution of collective accountability within particular countries, by definition they do not provide a broad perspective of regional trends in collective accountability.

One body of research that stands out as an exception and covers a wider span of self-regulatory initiatives in Africa comes from the work of Mary Kay Gugerty (Gugerty 2008; 2010a, b). Gugerty (2008) takes a collective action approach to self-regulatory initiatives, looking at the specific challenges of three types of accountability initiatives in Africa: national-level guilds, NGO-led clubs and voluntary codes of conduct. National level guilds typically offer broad membership, but are weak as accountability mechanisms due to a lack of administrative capacity, Voluntary clubs display greater accountability, but are limited in membership due to the necessity of creating reputational benefits through exclusive membership. Voluntary codes of conduct, while the most common form of self-regulation, present a collective action problem as organisations can sign up to the code without any intention of adhering to it.

Gugerty (2010a, b) looks at the motivation behind the emergence of CAIs in Africa, studying cross-national data across 22 countries and presenting six detailed case studies. She posits that accountability clubs were initially motivated by hostile government regulation that pushed CSOs to propose their own legislation to supersede that of the state. The first generation of collective accountability initiatives thus consisted primarily of national-level initiatives that attempted to cover the entire NGO sector, leading to a misalignment between the goals of compliance and wide inclusion. The second generation of CAIs took the form of more stringent and exclusive certification schemes as a response to the failure of the first generation of CAIs to adequately ensure NGO accountability.

Gugerty's studies mark an important step towards a more macro-level view of self-regulation/collective accountability in Africa. Her findings provide a better understanding of the links between government attitudes, donor interests and emergence of particular types of self-regulation, and offer useful explanations of the regulatory contexts in which collective accountability in certain African countries emerged. There is, however, scope to add to Gugerty's analyses to arrive at a more nuanced understanding of African CSO collective accountability. In particular, little is known of the different principles and standards of African CAIs, and no systematic analysis has been done on what thematic areas African CAIs are addressing and why. The following two sections will draw on the One World Trust's database of self-regulatory initiatives and primary research to present such an analysis, characterising the content and shape of CSO collective accountability in Africa, how it differs from CAIs in other developing countries, and how these differences are shaped by issues specific to African civil society.

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<sup>7</sup> See, for example: Adiin-Yaansah (1996); Kwesiga and Namisi (2006); Wamucii and Idwasi (2010).

### 3. Data analysis

#### *Types of initiatives*

The One World Trust's research shows that 40 national-level collective accountability initiatives exist across 20 countries in Africa. As Figure 1 demonstrates, the most common type of CAI are codes of conduct or ethics. Information services make up the next most common form of self-regulation, mostly in the form of NGO directories. There are three certification schemes across sub-Saharan Africa: the Quality Assurance Mechanism in Uganda, VIWANGO's Standards, and the National HIV and AIDS Response Code of Conduct in Kenya, the latter two of which were initiatives in development at the time that this research was undertaken (June—October 2012). There are also three self-assessment schemes and two working groups.

**Figure 1: Breakdown of African CAIs by type**

The majority of these initiatives are hosted by umbrella groups (28), with some peer group-led initiatives (6) and a handful of third party mechanisms (4). The high incidence of umbrella organisations supports Gugerty's observation that the first wave of collective accountability initiatives in Africa mostly took the form of national NGO associations. This becomes more apparent when looking at CAIs before and after 2005:

**Table 1: Nature of sponsorship before and after 2005<sup>8</sup>**

	Pre-2005 CAIs	Post-2005 CAIs
Umbrella groups	8	12
Peer groups	0	6
Third party	1	3

While eight out of the nine initiatives in existence prior to 2005 were hosted by umbrella groups, six peer groups emerged in the years after 2005, as well as two third party hosts. While umbrella groups are still most common type, this concurs to some extent with Gugerty's hypothesis that the second generation of CAIs will be more selective and cover a narrower group of organisations.

Examining the numbers according to date of initiative, it is notable that almost two-third of the initiatives started on or after 2005. This fits earlier observations about the increasing importance of CSO accountability in Africa. The variety of CAIs has also increased in recent years, as shown in Table. 2:

**Table 2: Types of initiatives pre- and post-2005**

	Pre-2005 CAIs	Post-2005 CAIs
Code of conduct	8	9
Certification schemes	1	3
Information services		5
Self-assessments		2
Working group		2

While eight of the nine pre-2005 initiatives are codes of conduct, this drops to less than half of the CAIs post-2005. The three certification schemes are from this later period, as well as five information services, two self-assessment initiatives, and both the working groups.

### ***Compliance and Sanctioning***

While codes of conduct are the dominant form of self-regulation, they often do not include any formal compliance system whereby adherence to standards might be ensured, as elaborated by Lloyd et al (2010). Of the 31 self-regulatory initiatives (excluding information services and working groups), only nine record any means of compliance stronger than a promise of commitment or

<sup>8</sup> Only information for which the date of initiation could be verified are included in this table. This data is available for 30 of the original 40 initiatives.

undeclared self-assessments. Six of these CAIs rely on a complaints-based system, while the others feature peer or third party monitoring and certification schemes.

Sanctioning mechanisms also do not feature prominently in African CAIs, with only eight out of 31 initiatives having any form of a sanctioning element. This sits oddly with the previous finding that the range of CAIs across Africa might be shifting towards more exclusive accountability clubs. This discrepancy appears to come from the still substantial number of codes of conduct in the post-2005 sample (see Table 2), many of which rely on commitments or undeclared self-assessments, and do not mention any further form of compliance or sanctioning.

Thus, while a second generation of CAIs may be growing across Africa with the purpose of improving performance and accountability (see Box 1), this is happening within a context of collective accountability—mainly in the form of codes of conduct—that often has no identifiable compliance system.

### ***Areas addressed by African CAIs***

This section examines the content of African CAIs in detail, identifying the areas covered by their principles and standards, and comparing these to equivalent data for other Southern CAIs. The comparison with CAIs from a similar context is important for understanding what is unique about African initiatives, and yields valuable information on what areas appear to be a specific priority for the improved performance and accountability of African civil society organisations.

Table 3 shows the types of standards or principles used in both African and Southern CAIs. It reveals that the most prevalent standard or principle in African CAIs is a general commitment to transparency, with over half of the identified initiatives including this commitment in their standards or principles. The second most common standard or principle relates to financial reporting (53%), and the third to stewardship of funds (45%). Other common standards include commitment to good governance, staff relations, commitments to CSO collaboration, and a general commitment to client participation.

#### **Text Box 1. *The Code of Ethics for Cameroonian NGOs***

The Code of Ethics for Cameroonian NGOs in its current form uses a complaints-based review system. However, in the interests of promoting greater accountability in civil society, the host and partner organisations supporting the Code are considering creating independent ethics committees of three to five people across the ten regions in Cameroon, backed by a national-level ethics committee. The regional committees would assess signatories of the Code, and conduct annual or bi-annual evaluations to monitor progress from the point of first assessment. After attaining a certain level of performance, organisations would be eligible for certification. The ethics committees would therefore have a mandate to monitor and certify signatories of the Code.

**Table 3: Breakdown of African and Southern CAIs by areas addressed (in %)**

Areas addressed	Standards or principles	% of African CAIs	% of Southern CAIs
Communications	General commitment to transparency	57.5	72.31
	Ethical communications	10	10.77
	Fundraising standards	15	21.54
	Lobbying standards	0	3.08
Management and governance	General commitment to good governance	37.5	52.31
	Anti- Corruption	15	6.15
	Auditing	35	33.85
	Board structure	32.5	30.77
	Conflict of Interest	35	33.85
	Financial reporting	52.5	60.00
	Stewardship of funds	45	13.85
	Procurement	22.5	10.77
Human resources	Staff development and training	30	7.69
	Volunteer relations	12.5	15.38
	Staff relations	42.5	41.54
Beneficiary/client/supporter participation	General commitment to beneficiary/client/supporter participation	42.5	29.23
	In all project cycle stages	2.5	7.69
	In needs assessment	5	6.15
	In project design	12.5	4.62
	In implementation	10	3.08
	In monitoring (during project)	5	1.54
	In evaluation (ex post)	17.5	13.85
	In strategic planning	5	3.08
	Financial reporting to beneficiaries	7.5	10.77
Monitoring and evaluation	General commitment	32.5	30.77
	Commitment to integrate learning in future	10	6.15

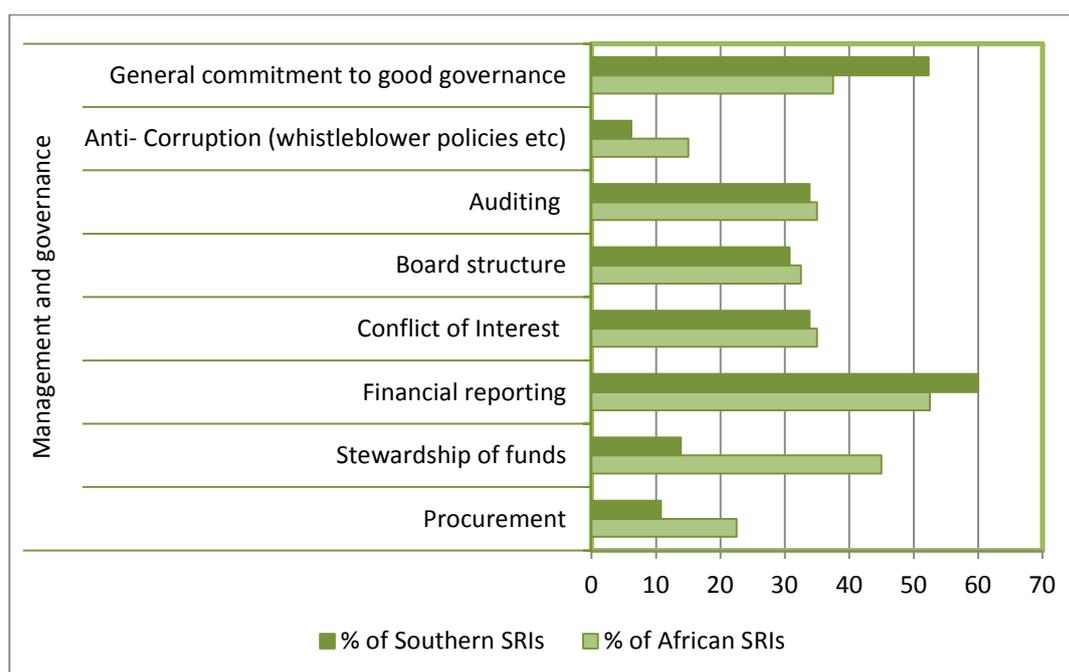
	Dissemination of evaluations	15	16.92
	Impact evaluation	17.5	21.54
Cross-cutting	Gender equality	12.5	30.77
	Environmental impact	10	21.54
	Human rights	20	21.54
	CSO collaboration and partnership	42.5	24.62
	State-CSO relations	27.5	20.00

There are three main areas of contrast between African and Southern CAIs that can assist in characterising the key functions that collective accountability serves in African civil society in particular: Communications and Management & Governance principles, Beneficiary/client/supporter participation; and the variations in Cross-cutting themes.

### **Communications and Management & Governance**

Comparing African and Southern CAIs, we see some similarities, primarily regarding the rate of uptake of Communications or Management & Governance best practice standards. The most common standard in both African and other Southern CAIs is a commitment to general transparency, though a higher percentage of Southern CAIs mention this (72% vs. 58%). Both groups of CAIs display a lack of specific principles or standards relating to communications, and standards relating to monitoring and evaluation, aside from commitments to M&E practices.

Both groups also display a commitment to good governance, although once again, a greater proportion of Southern CAIs include a general commitment to good governance compared to African CAIs. A more nuanced picture emerges when we compare the more specific standards related to Management & Governance. As Figure 2 shows, a higher percentage of African CAIs require members to incorporate specific regulating policies on issues such as anti-corruption, auditing, good stewardship and financial procurement compared to Southern CAIs. This indicates that governance of CSOs is an important concern for collective accountability in Africa, and fits the description in Section One of a civil society under pressure to display good management and accountability practices.

**Figure 2: Management and governance standards in African and Southern CAIs (in %)**

The emphasis on financial probity in particular suggests that CAIs in Africa are being designed to answer to donor and public concerns over the financial scandals that have plagued many civil societies in the region. It is unclear, however, to what extent these concerns will be answered by initiatives that do not incorporate rigorous monitoring or sanctioning mechanisms to ensure that member organisations are meeting the best practice standards for financial governance.

### **Beneficiary/Client/Supporter Participation**

Standards to include beneficiaries in multiple or all stages of the project cycle are infrequent across both groups of collective accountability initiatives, although a higher percentage of African CAIs contain standards on a general commitment towards client participation (43% vs. 30%). There is also a significantly higher proportion of African CAIs requiring beneficiary inclusion in the specific project stages of monitoring, implementation and evaluation compared to other Southern CAIs. A number of factors contribute towards the importance of CSO-beneficiary relationships to CSO legitimacy within African countries, which may explain why beneficiary/client/supporter participation features more prominently in African collective accountability initiatives. These are discussed below in Section Four as drivers for self-regulation cited by practitioners working in self-regulation in African countries.

### **Cross-cutting Themes**

On cross-cutting themes, a smaller proportion of African CAIs include standards relating to gender equity and environmental impact compared to other Southern CAIs. However, they include standards on civil society collaboration much more often (43% vs. 26%), as well as on state-society relations. These findings suggest that self-regulation in Africa is less focused on establishing shared best practice along particular programmatic themes, such as gender equity, and more

focused on strengthening and legitimising the sector as a whole. It is possible that this is a reflection of the focus engendered by the ‘first wave’ of CAIs in Africa, identified by Gugerty (2010a, b) and discussed above in Section Two, in which there has been a greater emphasis placed on the broad purpose of strengthening and defining the civil society sector. As more sub-sector or thematic CAIs emerge in coming years, the rate of initiatives that include standards on cross-cutting programmatic themes may rise.

## **4. Shaping African CAIs- the role of challenges to African civil society**

The above section highlighted that African CAIs are different from other Southern CAIs in at least three crucial aspects. This section will explore these differences in greater detail, drawing upon four in-depth interviews conducted with accountability practitioners from Cameroon, Kenya and Sierra Leone<sup>9</sup> to trace how challenges unique to African civil society have impacted the content and structure of their initiatives. While the number of interviews is limited, and while there is substantial diversity across the civil society sector in Africa, the near-parallel experiences across four initiatives in three different countries indicates that these issues might apply across Africa more generally.

### ***Building resources and capacity***

Both the data analysis and the interviews indicate that collective accountability initiatives are being used to address certain weaknesses inherent in the structure of African civil society. A recurring topic across the interviews was the lack of both financial and human resources in African CSOs, a feature of African civil society that has been frequently noted in other research (Gyimah-Boadi 1996; Robinson 1995; Makumbe 1998). Interviews show that attempts at redressing the gap are being made through CAIs. A broad indicator of this can be seen in Table 3, which shows that 30% of African CAIs include commitments to staff development and training, compared to only 8% of other Southern initiatives.

More specifically, the use of CAIs to nurture greater financial sustainability and staff capacity can be seen within individual initiatives. For example, the Code of Ethics for Cameroonian CSOs, includes the broad principle, ‘CSOs shall strive for financial self-sufficiency’. VIWANGO’s Standard 6.4 on Organisational Sustainability states that ‘the organisation has a resource diversification plan; and a policy on reserves and endowments. The CSO actively and innovatively seeks to get a balance between internal versus external resources’. In Kenya, a number of the organisations working in the HIV/AIDS sector are small community-based organisations that are very dependent on foreign funding. The NACC’s Code of Conduct requires signatories to follow clear standards on organisational capacity (see Text Box 2), and the NACC also has plans to assist smaller community

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<sup>9</sup> Interviews were carried out by Sharukh Mirza with individuals affiliated with the Code of Ethics for Cameroonian NGOs; VIWANGO’s Civil Society Standards, Code of Practice and Organisational Capacity Self-Assessment Tool; the National HIV and AIDS Response Code of Conduct in Kenya; and the Accountability Working Group in Sierra Leone.

–based organisations that may not be able to comply with the SRI’s standards because of a lack of resources through capacity-building programmes. CAIs are thus being used to both encourage sustainability in organisations that sign up to it, as well as locate and assist organisations that are unable to become sustainable on their own.

While all Southern CSOs face challenges in building resources and capacity, the structural weaknesses in the not-for-profit sector in Africa provide a unique shape to collective accountability in this region. As mentioned above, the comparative absence of specific programmatic or cross-cutting themes in African SRI principles and standards, such as gender equity or environmental sustainability, is likely due to the ongoing emphasis on shoring up basic capacities and financial best practices in order to ensure the basic survival of CSOs as a form of social organisation. In line with Gugerty’s findings, the development of more specific standards based on type of CSO activity or programme area may come after the sector has reached greater stabilization.

### ***Increasing legitimacy in the eyes of multiple stakeholders***

The data analysis also shows governance and beneficiary participation standards to be an important topic for African CAIs. As Table 3 demonstrates, a bigger proportion of African CAIs have standards relating to more specific policies such as anti-corruption, whistle-blowing, conflict of interest, stewardship of funds, and procurement. Exploring the reasons behind this through the interviews, collective accountability practitioners indicated that, to some extent, the emphasis on good governance and management is not viewed as a response to any well-defined challenge of African civil society, but is instead driven by normative notions of what civil society’s values should be. Many of the interviewees thus expressed good governance and accountability best practice as being an end in itself.

However, it was apparent that CAIs are also being used to address the practical challenges that lie within a negative perception of the civil society sector across the continent. As noted elsewhere, incidences of corruption and a lack of communication between CSOs and local communities have

#### **Text Box 2: *The National HIV and AIDS Response Code of Conduct in Kenya***

In 1999, the Government of Kenya declared HIV/AIDS to be a national disaster, and established the National AIDS Control Council to coordinate the country’s response to HIV/AIDS. The NACC and its stakeholders have developed a Code of Conduct, aimed both at building the commitment and the capacity of the NACC and stakeholders to effectively implementing the National HIV and AIDS Response, and to improve collective impact. The Code consists of broad fundamental principles, backed by measurable standards. One of the principles relates to resource mobilisation, and includes the standards, ‘We are able to demonstrate a sufficient resource base to maintain ongoing or proposed activities,’ (Standard 6.1) and, ‘We endeavour to maintain a diversified and sustainable income base,’ (Standard 6.4). These are to ensure that organisations operating in the HIV/AIDS sector are not overly dependent on donors, and do not stop operating if the funding cycle ends.

The NACC Code of Conduct also includes well-developed guidelines on fostering staff potential, including Standard 4.8: ‘We recognise and invest in the importance of relevant training, development and learning opportunities for all staff members, at both personal and professional levels’, marking an explicit focus on building human resources.

corroded public, government and donor confidence in civil society across many African countries (Opoku Mensah 2008). This was reflected in the interviews, where the need to increase accountability in terms of more transparent organisational procedures and finances was mentioned in all the interviews as something collective accountability needed to address. In Kenya, for example, there is growing dissatisfaction with the siphoning off of money from development projects, and there is considerable pressure from the public to demonstrate that money is going where it should (see Text Box 3).

While donors, the general public, and the state remain important stakeholders, a prominent theme across all interviews was the need for collective accountability to address the concerns of clients or beneficiaries. For example, in Sierra Leone, a country struggling with high rates of poverty and illiteracy and severe infrastructural problems, the broader development project is seen by many at the community level to be failing. The apparent lack of success in well-funded efforts to combat problems, such as infant mortality or river blindness, is leading to calls from communities for answers from NGOs and other organisations working in development. Similarly, in Cameroon, a wide-ranging survey with over 700 civil society organisations revealed concerns in the sector over ways to ensure organisations were legitimate representatives of the communities they claimed to serve, and were acting in the interests of the community. The image of civil society in the eyes of the community was therefore an area that the Code of Ethics for Cameroonian Civil Society Organisations needed to address, and the current copy of the Code includes a number of standards on promoting the interests of communities, especially vulnerable and marginalised individuals or groups. As Table 3 in the previous section indicated, more African CAIs include standards relating to commitment towards client participation compared to other Southern CAIs, which can be surmised to be due, at least in part, to the concerns over the quality of service delivery and advocacy as voiced by clients/beneficiaries.

The use of self-regulation by African CSOs to improve service delivery and become more accountable to those they intend to serve seems somewhat surprising given the contemporary

**Text Box 3: VIWANGO Civil Society Standards, Code of Practice and Organisational Capacity Self-Assessment Tool**

The origins of VIWANGO lie in two studies conducted in 2006 and 2007 on the Kenyan civil society sector, commissioned by the Aga Khan Development Network (AKDN). These studies revealed serious problems in the areas of governance and sustainability, as well as a lack of leadership in the sector. The studies established a need for universal standards that everyone agreed on, and recommended a credible, voluntary certification mechanism to show that the civil sector was becoming organized. This led to the creation of VIWANGO, named for the Swahili word for 'standards'. Subsequently, VIWANGO's consultations with CSOs revealed that accountability and transparency were two of the main concerns in the sector, following a rise in the number of fraudulent organisations operating in the sector, and public cases of embezzlement of funds. Consequently, included within a number of areas addressed by the VIWANGO Standards, is a strong component of financial management, including keeping prudent financial records, maintaining a properly managed bank account, annual audits by an independent and certified body, and standards on procurement.

literature on collective accountability discussed in Section One, as well as Gugerty's finding that accountability efforts in Africa respond mainly to the needs of governments and donors. While some of the interviewees did mention that a well-functioning CAI would be helpful in building stronger relationships and lines of communication with the government in the future, this was seen more as an additional benefit of collective accountability rather than its primary purpose. Similarly, while one SRI practitioner mentioned that a more regulated sector could ease access to donor funds in the future, this was secondary to the perceived need to become more accountable as a CSO, and was not a strong issue in the other interviews.

In Sierra Leone, a country with far more fragile governance and more rampant poverty, the scenario is a slightly different, but the findings remain the same. The Sierra Leonean government's relationship with CSOs was described as mixed, with the government seeking more control over civil society. However, the extensive involvement of donors in the country currently acts as a buffer between the government and Sierra Leonean CSOs. In the absence of donor pressures for greater regulation, this would indicate few structured incentives for collective accountability. However, the CSO practitioner indicated that collective accountability was sought after in Sierra Leonean civil society primarily in order to foster accountability as a matter of principle, as well as to improve the CSOs' relationships to beneficiary/client communities increasingly disillusioned with the development project.

### ***Seeking improved cooperation and collaboration within the sector***

A final defining challenge to African civil society is a lack of cooperation between organisations. Much of this lack of collaboration can be traced to the lack of resources described above, which has led to a culture of competition, with CSOs seeing each other as rivals for funding rather than partners. One interviewee described organisations as operating under the rule that "your loss is my gain". These tensions are compounded by logistical difficulties, such as the inadequacy of communication resources and infrastructure. Another interviewee described how difficult it was to communicate with CSOs based far away from cities because of electricity shortages and poor transport networks. This is a significant barrier to greater cooperation and widens the gap between the capacities and participation of urban and rural organisations, raising questions about the potential domination of "elitist" urban CSOs as discussed in Section One.

African CAIs are attempting to address these issues, as indicated by their higher rate of inclusion of

#### **Text Box 4: The Accountability Working Group (AWG) in Sierra Leone**

Collaborative efforts are difficult to achieve in Sierra Leone, where some CSOs have a tendency to isolate themselves from others. The lack of intra-sectoral collaboration and knowledge-sharing has led Accountability Alert-Sierra Leone (AA-SL), the Secretariat of the Accountability Working Group, to identify Partnership and Collaboration as one of its five principal strategic focus areas, with the objective of establishing 'effective partnerships and frameworks for action with NGOs/CSOs, donors and other public institutions for greater transparency within the development community' (AA-SL Strategic Plan 2011-12). One important activity in this regard has been a mapping survey of CSO accountability in Sierra Leone, aimed at identifying existing accountable practices within different organisations.

standards on CSO collaboration and partnership compared to other Southern CAIs. The importance of rectifying the capacity and access gap between rural and urban CSOs was discussed in three of the interviews, and is manifest in the CAIs with which the informants had been involved. For example, in Kenya, one of the problems that self-regulation needed to address was the lack of coordination and information-sharing between organisations working in HIV/AIDS, as a result of which duplication of efforts occurred and community fatigue of development interventions set in. The National HIV and AIDS Response Code of Conduct therefore has a component on Communications, Consulting and Networking, the fundamental principle of which is to establish 'effective and efficient internal and external communication and two-way systems so that all personnel and partners are fully informed and engage in informing all others about our activities'.

It should also be noted that while CAIs are attempting to foster greater accountability between CSOs generally, they are also contributing to cooperation between agencies and countries through their own existence. Collaboration between CSOs working on CAIs was a strong benefit mentioned in every interview. For example, VIWANGO has been asked to participate in a team working on the National HIV and AIDS Response Code of Conduct. Representatives from Uganda's Quality Assurance Mechanism (QuAM) and the North West Association of Development Organisations (NWADO) in Cameroon presented lessons learned from their CAIs in a joint Accountability Alert-Sierra Leone-CIVICUS workshop on CSO accountability, influencing the work of the Accountability Working Group (see Text Box ). The cooperative model used by this core group of organisations draws in other networks and agencies through their attempts to directly involve other CSOs into contributing to the CAIs. For example, in the case of VIWANGO, many of the standards originate from individual organisational standards, such as Constitution and Reform Education Consortium (CRECO), which contributed the standards used to judge the Civil Society of the Year Awards (CSOYA).

## 5. Priority Recommendations

The preceding section discussed in some detail the particular set of challenges surrounding legitimacy, resources and cooperation faced by African CSOs. Collective accountability initiatives can play an important role in this context by filling the quality & standards vacuum created by a lack of individual CSO capacity for building organisational accountability systems and the absence of fair, supportive state regulation of the not-for-profit sector. However, CAIs may themselves be adversely affected by constraints similar in nature to those faced by CSOs. This section suggests ways that collective accountability initiatives can overcome these constraints to remain a viable answer to the regulatory vacuum.

### *Increasing legitimacy in the eyes of multiple stakeholders*

As indicated by many of the interview participants, CAIs are used to enhance CSO legitimacy in the eyes of multiple stakeholders. However, if precautions are not taken, the gaps that can exist in the relationship between African CSOs and other stakeholders may be recreated in the initiative through ungrounded or biased standards. The following two recommendations look at ways to counteract such a possibility and ensure that CAIs are genuinely useful mechanisms to enhance legitimacy.

**Recommendation 1: Clearly identify credibility gaps**

The need to respond to multiple stakeholder groups, whose interests and preferences often conflict, is a well-acknowledged challenge for CSOs as they seek to be accountable and legitimate to these diverse audiences (Ebrahim 2007, Edwards and Hulme 1995). This desire to satisfy all stakeholder interests in a single initiative may lead to incoherence in how that initiative is structured and the design of its compliance mechanisms. If anticipated, these challenges can be answered through careful design.

One way to engage in these considerations in a clear and structured way is through a 'credibility audit', carried out by those who are seeking to benefit from the establishment of an initiative. The audit should be carried out early on in the design process and begins with an identification of the main components of a CAI, such as: principles/standards, learning & collaboration opportunities, capacity-building services, an entry/membership process, and a compliance system (reporting, monitoring, sanction mechanisms). Participants should then engage in a stakeholder mapping exercise to characterise the key stakeholders for the collective accountability initiative, followed by an audit of current credibility levels with each stakeholder (using survey data when available, but otherwise drawing on participants' perceptions).

In the final step, participants identify what factors serve as the basis for their credibility with each stakeholder group (e.g. effectiveness, long-term grassroots connectedness, financial probity) and map these factors onto different components of the CAI, identifying different options for SRI design that respond to the key credibility criteria. For example, it may be the case that the basis for NGO credibility amongst a donor audience is the demonstration of effectiveness, which can be served equally well through a public sanction mechanism or a rigorous internal reporting process. The identification of different design elements that can respond to this basis for building credibility with donors provides participants with some options as to how they design the CAI to respond to that basis. Participants can then test the compatibility of components that are designed to respond to different criteria/stakeholders until an appropriate overall design emerges.

**Recommendation 2: Carry out consultations with clients/beneficiaries**

A stakeholder group that is particularly vital for African CSOs are clients/beneficiaries, as CSOs are frequently funded on the presumption of their close relationships with communities. In Sierra Leone, research conducted by Accountability Alert-Sierra Leone found that the lack of communication between communities and CSOs meant that neither side was sufficiently aware of the other's concerns and efforts. CAIs need to be designed to help close this distance. One way to do so is to carry out consultations on what standards should be enacted with clients. The incorporation of views from clients alongside those of CSOs can contribute towards more contextualised standards that identify and provide for local concerns. It can lead to a more substantive mechanism that goes beyond broad declarations on beneficiary accountability to detailed provisions desired by clients.

The discussion between clients and CSOs on the issue of a specific CAI should also help to familiarise communities with the concept of collective accountability itself, disseminating the idea more widely. As clients become aware of such mechanisms, one possible implication is that, in time, communities can themselves raise questions about organisations that do not participate in a recognised SRI.

Opening this channel of communication with communities therefore has the immediate benefit of improving the design and relevance of African CSO standards, and in the longer term has the potential to raise awareness and empower communities to develop more specific expectations for how they want CSOs to work with them.

### ***Building resources and capacity***

Despite the importance of accountability and performance-monitoring systems and practices for strengthening CSO activity, funding for these ‘overheads’ has historically been very challenging, as donors and the public are keen to see a majority of a CSO’s financial resources put towards direct programme implementation. This impacts funding for African CAIs, which already face particularly harsh financial constraints due to the inability of many African CSOs to pay high membership fees. State funding for African CAIs is also not unproblematic, as there is a significant risk for co-optation of CSOs by the government.

#### **Recommendation 3: Use an SRI as a platform for collective fundraising from African donors**

A CAI may be sustainably financed if used as a platform for funding the work of its members, thus tying the CAI closely to the benefits brought about through the member CSOs’ activities. In using this approach, African CSOs could borrow from pre-existing models, such as that of the Disasters Emergency Committee of the UK. Members of the DEC agree to fund as a collective for extreme crises and emergencies, providing a single platform through which the British public can donate to their efforts. In addition to its core function as a collective fundraising platform, the DEC hosts a CAI for its members based around its Accountability Framework. This system enables DEC member agencies to fundraise more efficiently for extreme crises and provides a collective system of compliance and shared standards through which donors (the UK public) can confirm that their donations are being spent effectively.

Recent successes in grassroots fundraising in Africa point to the potential for African-based CAIs to raise funds from members of their public as successfully as the DEC in the UK. For example, in response to the 2011 Horn of Africa crisis, a partnership of Kenyan corporations and the Kenya Red Cross established an appeal, ‘Kenyans for Kenya’, which sought to raise funds for the aid effort exclusively from Kenyans, mainly via text message donation. The initial goal of 500 million Kenyan shillings (approximately 3.7 million GBP) was exceeded, with over KSh 677 million raised within two months. This success points to the resources that an African CAI can draw on if its members successfully cultivate ownership and buy-in from members of their public. This buy-in can be achieved through a public relations approach that communicates how the initiative’s standards and compliance systems will ensure that member CSOs are delivering high-quality services and support to communities within the country or region.

#### **Recommendation 4: Transform SRI membership into a good practice brand in the North**

Another way to overcome the resource barrier is through the transformation of SRI membership into a brand identity with the capacity to draw in funds from individual donors in the North. This is already a widely used strategy in the North, where standards such as GiveWell or the PQASSO Quality Mark offer impartial verification of the quality and credibility of charities. In the same way, SRI membership for Southern CSOs could act as a signal for good accountability practices to those

seeking to donate responsibly in the South. The South African Social Investment Exchange (SASIX) is one example of an African initiative that is already working on similar principles. SASIX assesses social development projects and offers funders the chance to invest in projects identified as meeting quality performance standards. African CAIs could build on this model, allowing donations to be made to member organisation through a common portal as in the case of SASIX. This would allow a small percentage of the donation to be set aside for the work of the mechanism itself, thus promoting the sustainability of both CSOs and the SRI that seeks to make their work more accountable.

### ***Seeking improved cooperation and collaboration within the sector***

As described in the previous section, CAIs in Africa are being shaped by the need to address the cooperation problems present in the continent's civil society sectors. However, it should be noted that such problems can take place in two stages. Existing CAIs are trying to address the first-stage cooperation problems between numerous organisations working in the same field by encouraging collaboration between CSOs. However, the CAI itself may be beset by similar problems unless measures are taken to create buy-in from these different organisations. This has even greater relevance in Africa, where resource pressures, the rural-urban divide and the diverse nature and needs of CSOs ranging from small community-based organisations to large international NGOs can make agreement on one set of standards a very difficult task.

#### **Recommendation 5: Build consensus between SRI members**

In order to counteract these tensions, the formation of CAIs should be marked by central and sustained efforts at building consensus and accommodating the varying needs of different CSOs. Extensive communication between CSOs is necessary to generate accord. Beyond providing input into what standards should be enacted, the SRI itself could be designed to take account of the discrepancies in scale and resources amongst CSOs, in order to make membership attractive and meaningful to them. For example, the NACC Code of Conduct offers capacity-building support for those organisations that are not able to meet the required standards on their own. Another option is to compose a set of standards applicable to all members, supplemented by a fuller range of requirements for bigger and well-resourced organisations, with a central CAI administrative body to assign members the relevant set of standards.

#### **Recommendation 6: Focus on tangible gains of SRI membership**

While building consensus is integral to a functioning CAI, CSOs in many African countries are driven into competition with one another by a variety of pressures. In this context, maintaining consensus over time will remain a challenge unless collaboration is tied to specific purposes, preferably with tangible gains that can only be enjoyed through participation in the collaborative venue. In order to be effective and sustainable, self-regulatory initiatives must take this seriously; CAIs in which organisations merely sign onto a code of conduct at a publicised meeting and do not monitor or report on their performance are unlikely to be effective in bringing about changes in organisations or in their credibility to external stakeholders. Without these tangible gains, continued collaboration around the initiative tends to decline, as CSOs find it more advantageous to develop their systems and relationships with external stakeholders on their own.

Tangible gains can be financial, material, reputational, or strategic. As discussed in Section One, many African CSOs face increasingly restrictive and aggressive legislation from the state. A collective accountability initiative can perform an important dual role in these contexts, by creating a forum in which CSO existence and activity is legitimised through the enforcement of clear, well-defined standards, and CSOs are enabled to work collectively on a strategy to engage constructively with the state. When CAIs go beyond standard-setting to serving as an alliance to address common external threats, this can provide both a tangible benefit and a shared interest through which CSOs can build more collaborative relationships.

## Conclusion

Drawing on the One World Trust's extensive database of civil society self-regulatory initiatives from across the world, this paper has reviewed the current field of CSO collective accountability initiatives in Africa, identifying key topics that characterise African CAIs and the specific challenges that explain why these topics are given greater emphasis in the African context.

Overall, the review reveals a trend of increasing numbers and variety of CAIs. Key topics that African CAIs emphasise in comparison to other Southern CAIs are: specific governance standards, particularly those pertaining to financial probity; client/beneficiary/supporter participation; and CSO and CSO-state relationships. A noticeable absence in African CAIs in comparison to their Southern counterparts lies in standards pertaining to more specific programmatic areas or cross-cutting themes, such as gender or environmental sustainability.

Interviews with representatives of four CAIs in Cameroon, Kenya and Sierra Leone provided context for these findings, indicating that African CAIs emphasise standards that can address broader issues of legitimacy in their work, such as better management and governance in CSOs and accountability towards clients. Importantly, while the literature on African CAIs so far has focused on the use of self-regulation to respond to the challenge of state encroachment and donor concerns with credibility, this paper's findings reveal a more nuanced picture in which the importance of other stakeholders, namely CSO clients and the wider public, are clearly emerging as audiences to which collective accountability is being oriented. The research also shows that CAIs are being used in African civil societies not only to address deep-set questions of CSOs' voice, role and legitimacy, but also to tackle structural problems such as the lack of financial and human resources, and the lack of cooperation and communication between agencies in the sector, through inclusion of standards encouraging capacity-building and collaboration. However, CAIs are not immune to the issues affecting civil society in Africa, and it is important that appropriate approaches are taken to avoid these hazards. The paper therefore offers a set of recommendations that addresses the challenges African CAIs may face in their operation.

Collective accountability initiatives have become a regular feature in the African civil society landscape. While the literature is beginning to take note of this phenomenon, there remains significant scope for further research. In particular, though there has been some investigation into why CAIs are created and what purposes they are meant to serve, a critical aspect not adequately addressed yet is how effective they are.<sup>10</sup> Future research on the topic of CAI effectiveness, and

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<sup>10</sup> For a discussion of key issues in assessing CAI effectiveness, see Obrecht (2012).

especially the collection of robust data on the difference CAIs make to the behaviour and image of CSOs would be extremely valuable to understanding how far CAIs can in fact contribute to tackling the challenges of African civil society. Research in this direction would have important implications not only for African civil society, but for CSOs across the world trying to become more accountable through self-regulation.

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