Scaling Up NUTRITION

Civil Society Network

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Accountability for Nutrition

Think Piece

Introduction

The SUN Civil Society Network (CSN) commissioned consultants and civil society alliances for the development of a think piece on accountability within the context of the SUN Movement and from a civil society perspective. This publication captures the state of the art of civil society's efforts to push for accountability in countries' efforts to scale up nutrition. This document is for a civil society audience primarily, and combines analytical articles and case studies. It is a concise, practical resource to inform and inspire civil society and provide examples of approaches that work. Civil society plays a crucial role in ensuring accountability in efforts to scale up nutrition, with accountability being a strong focus of the SUN strategy for 2016-2020. By sharing the learning available in the network, Civil Society Alliance (CSAs) and Civil Society Organisations (CSOs) in different countries will benefit and be better equipped to hold policy makers, government departments and other actors accountable.

This piece of work has also informed the strong focus of civil society contribution to the SUN Movement 2.0 2016-2020 strategy and road map.

The development of the think piece involved the SUN CSN writing and sharing the Terms of Reference for this work with various stakeholders including the SUN Movement Secretariat and the SUN networks for feedback. Following a competitive bid process, a team of consultants (Bernie Ward and Jay Goulden) were commissioned and started the development of the piece, with support from the SUN CSN secretariat for the commissioning of the Civil Society Alliances to draft key case studies. A draft was shared with the SUN Movement secretariat, the SUN networks, key civil society stakeholders outside the movement, the SUN CSN Steering Group, the SUN CSN Operational Oversight Committee for feedback. Revisions were then integrated and the think piece passed for translation and design for wider use.

It is proposed the content inform discussions through a series of SUN country calls and be disseminated broadly across the Movement whilst being accessible online.

Proposed Citation

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Front Cover: © Krista Armstrong, Save the Children

Village Chief of Kourni village, Zinder region (south of Mata Maye), Niger - Ousmane Mamane is pictured surrounded by other village nobles, as well as other villagers. Niger 2013.

1. Executive Summary

What is accountability?

Accountability can be defined as ensuring that **actions, decisions, programs, and policies made by public officials and other decision-makers are (1) implemented, (2) meet their stated objectives, and (3) respond to the communities they aim to benefit** (**Global Health Visions, 2015**). This highlights that while accountability applies to Government, it is also relevant to other key actors working on nutrition, such as the private sector, donors, academia, UN agencies, and to civil society organisations themselves. The concept of "social accountability" refers to a form of accountability from actions by citizens or civil society organisations aimed at holding the state to account and making it responsive to their needs, as well as from efforts by government and other actors (media, private sector, donors) to support these actions (**UNDP, 2010, Grandvoinnet et al., 2015**).

For the SUN movement, accountability relies on the ability to "account" for commitments, responsibilities and actions, and is facilitated by clear expectations, data and measurements. This builds on one of the SUN Movement's fundamental principles of engagement, **"mutual accountability"**, whereby all stakeholders feel responsible for and are held collectively accountable to joint commitments. The SUN focuses on consensus-based accountability mechanisms, generating shared agreements across nutrition stakeholders to take actions to put things right where responsibilities are not yet being fulfilled.

Why is it important?

Accountability work includes advocacy, coalition-building, and monitoring agreed results. Both advocacy and accountability are key parts of the SUN strategy, with a critical role for civil society actors, in driving coordinated advocacy efforts and in strengthening the accountability of all actors (SUN Strategy 2016-2020). Advocacy is required to ensure clear prioritisation, commitments, policies, plans, programs, resources and capacities for nutrition; accountability work is required to ensure that these are delivered on, and meeting the needs and rights of the most marginalized. Without advocacy, there is nothing to hold power holders to account for, and without accountability, advocacy gains may not be put into effect.

What are we trying to achieve?

Accountability work aims firstly to ensure that nutrition is politically visible and prioritized, at the highest levels of Government – and that it can stay this way, even beyond political cycles. The need is to build commitment at multiple levels: raising community awareness through civic mobilisation and multiplying champions (MPs, media, public figures) for accountability, so leaders are held accountable for maintaining this level of prioritisation for nutrition. Secondly, accountability can help make sure that this prioritisation has a supportive environment: a clear legal and policy framework, leadership within a prominent part of government, and sufficient financial resources. Civil Society Alliances (CSAs) then use accountability tools to ensure policies are lived up to, and resources are effectively and fairly allocated and spent. Third, CSA advocacy work makes sure that SMART[1] commitments are signed up to internationally, or nationally; and that national nutrition plans and monitoring frameworks are developed to help deliver on these commitments. Mutual accountability will then help to keep all motivated and on track, and to identify together the actions to resolve and correct the bottlenecks and challenges that inevitably occur.

Ultimately, accountability has to be established towards the people that suffer from malnutrition (the rights holders). This includes the work of CSAs to promote the accountability of Government and other power holders towards "direct beneficiaries" (such as women's groups, mothers clubs, farmer co-operatives or youth groups), to ensure that nutrition interventions reach those most in need of them. It also means CSAs have to "walk the talk", and be accountable themselves, both to beneficiaries ("forward accountability"), as well as within their membership ("internal accountability") and to Government and donors ("upward accountability").

[1] Specific, measurable, achievable & ambitious, realistic and time-bound.

The role of Civil Society in promoting accountability

For the SUN Civil Society Network (CSN) *"Civil Society stands as the critical bridge to ensure that the policy, plans and pledges are implemented in the interest of the people and reach the populations most vulnerable to malnutrition and the drivers of all forms of malnutrition. Civil Society has an essential watchdog role to play to ensure accountability and delivery of commitments."* CSAs are at the heart of advocacy and accountability work to put nutrition on to the agenda, ensure sustainability of nutrition prioritisation beyond political cycles, build relationships with key enablers (such as the media or MPs), and gain commitments, as well as holding to account on those commitments to ensure sustainable nutrition prioritisation. However, it is important to bear in mind that civil society is not homogenous, and careful attention needs to be put on which civil society actors to engage with, in order to be sure that the focus is on 'the interests of the people' who are the most marginalized. Research suggests that "transformative social change tends to come not from apolitical and technocratic NGOs, but from politically influential actors, such as social movements or religious groups" (**de Gramont, 2014**).

Lessons from global work to promote accountability

Research and experience on accountability in recent years has highlighted six main lessons for SUN Civil Society Alliances (CSAs) to take into account as they work to promote greater accountability in nutrition:

a) Information and transparency alone does not trigger action, either by citizens or by the State (**Fox, 2014**). While transparency is important, CSAs are well aware that providing information alone, on commitments or funding or progress, rarely achieves significant change.

b) Successful accountability work needs to focus not only on citizen action, but also state action (**Fox, 2014**). Jonathan Fox describes this as "voice" (citizen action) needing "teeth" (government's own accountability systems – i.e. their incentives or negative sanctions where there is non-compliance) in order to "bite". But as he also concludes, "teeth may not bite without voice". In other words, citizen-led and state accountability systems need each other to achieve results.

c) Tactical approaches to accountability, focusing on the application of "accountability tools" at one level, have limited effect. Applying a single accountability approach - such as a scorecard in a district, or budget analysis at national level, may bring about immediately improved results, but these are unlikely to be sustainable over time without more 'strategic' approaches (**Fox, 2014**). CSAs need to be working at multiple levels (from local to national to regional and international), engaging multiple sectors, and using different accountability tools and processes.

d) Citizen engagement has better outcomes if undertaken with and through local associations or social movements[2], rather than only through spaces opened up by the state for citizen engagement (**Gaventa and Barrett, 2010**). For citizens to successfully pressure and support government accountability, capable, autonomous and representative grassroots organisations and movements need to drive collective mobilisation (**Halloran and Flores, 2015**). This highlights the need for SUN CSAs to continue to ensure greater engagement of social movements and representative organisations within their membership, and their advocacy and accountability work on nutrition.

e) Without efforts to ensure inclusion of under-represented voices, accountability interventions can result in reinforcement of existing power relations (**Gaventa and McGee, 2013**). This reinforces the recommendation of the SUN Independent Comprehensive Evaluation that the SUN needs to pay particular attention to ensuring that national plans, Common Result Frameworks (CRFs), data gathering and inclusion activities pay particular attention to the needs of women and women's empowerment.

f) Work to promote accountability has to be adapted to different local contexts, and to changes in the context over time, based on a deep understanding of those contexts (**O'Meally, 2013, Tembo, 2013**). What is possible and appropriate in a context of significant openness to state-citizen engagement and high government capacity will be very different, for example, where space for citizens to engage is more closed or capacity is weak. This requires ongoing analysis of the context, iterative planning, and adjusting strategies as you learn what is working, and as new opportunities arise.

[2] The SUN CSN uses the definition of civil society as used in the **FAO strategy for Partnerships with Civil Society organisations**. These include but are not limited to small-holder farmers, fisherfolk, pastoralists and herders, forest dwellers, rural workers, urban poor, indigenous peoples, human rights defenders, women's groups, humanitarian and aid assistance agencies, advocacy and research entities, consumer groups, trade unions , faith and community-based organisations and many others..

How civil society actors can promote accountability for nutrition

There are a wide array of accountability tools available for civil society organisations to hold different organisations to account, whether government, private sector, donors and international organisations, or civil society themselves. The particular tools and approaches that are most relevant will depend on the local context and culture, on the legal and institutional framework, on the incentives that determine how policy makers operate, as well as on your relationships and legitimacy. For example, if your context is less open to civil society engagement you may need to moderate some of your approaches, selecting tools that can over time work to build trust towards opening up more space for citizens' engagement.

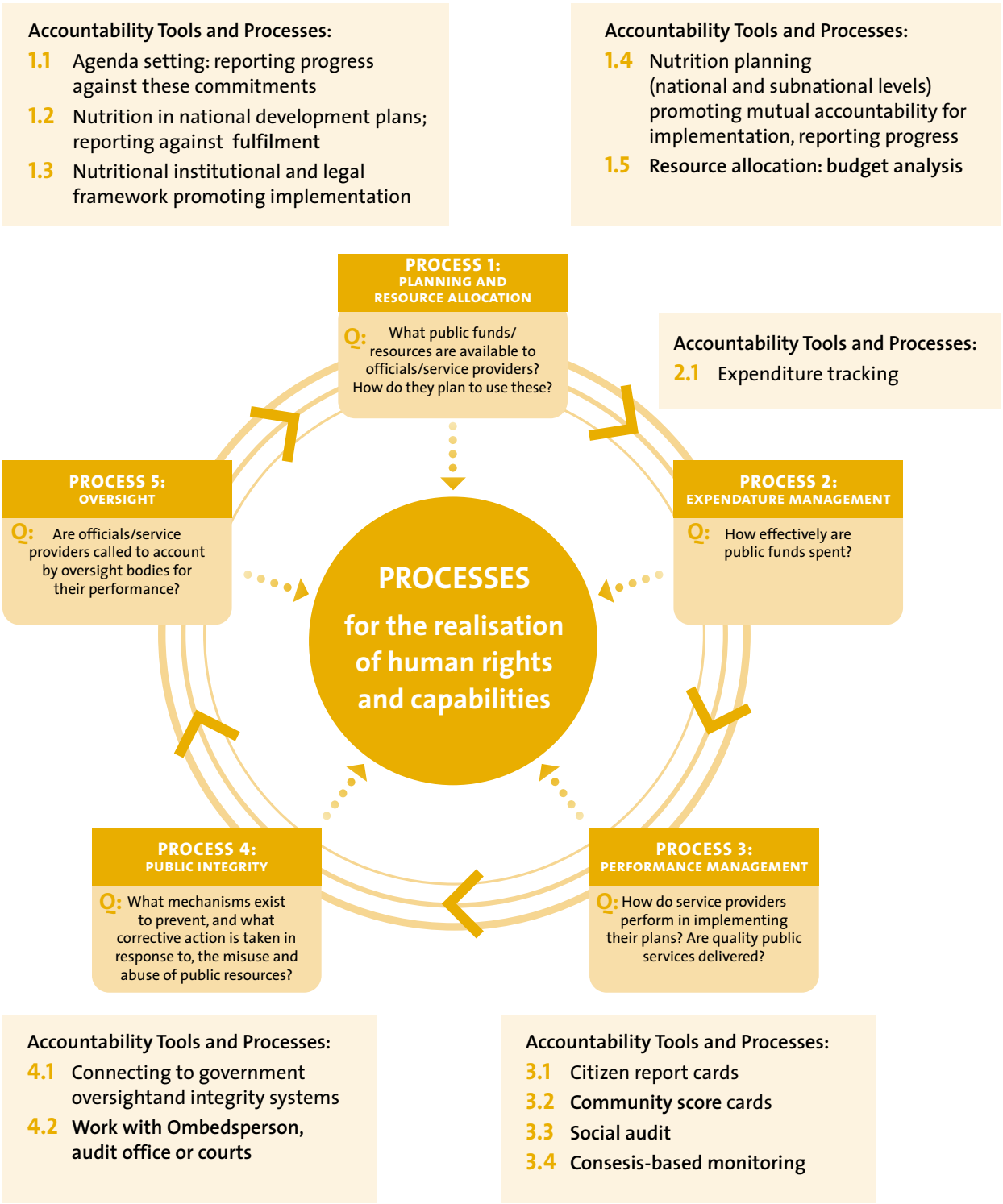
Rather than presenting a recipe for accountability, we highlight in this section a set of accountability ingredients, to be combined and adapted depending on your local context. Whatever your context, one useful way of thinking about accountability is as **the monitoring and evaluation process of the overall system** that is trying to deliver according to the overall nutrition commitments, targets and policies in the country. Instead of picking a specific tool (such as budget analysis or a community scorecard), CSAs need to look at the whole Social Accountability System (SAS)[3]– the planning & budgeting, the systems for managing expenditure and performance, the oversight and feedback systems – to see where things may have broken down. The figure to right shows these stages in the process, and the specific accountability processes and tools that CSAs can use at different parts of the cycle.

Specific accountabilty approaches and tools that CSAs can use in their work on nutrition include:

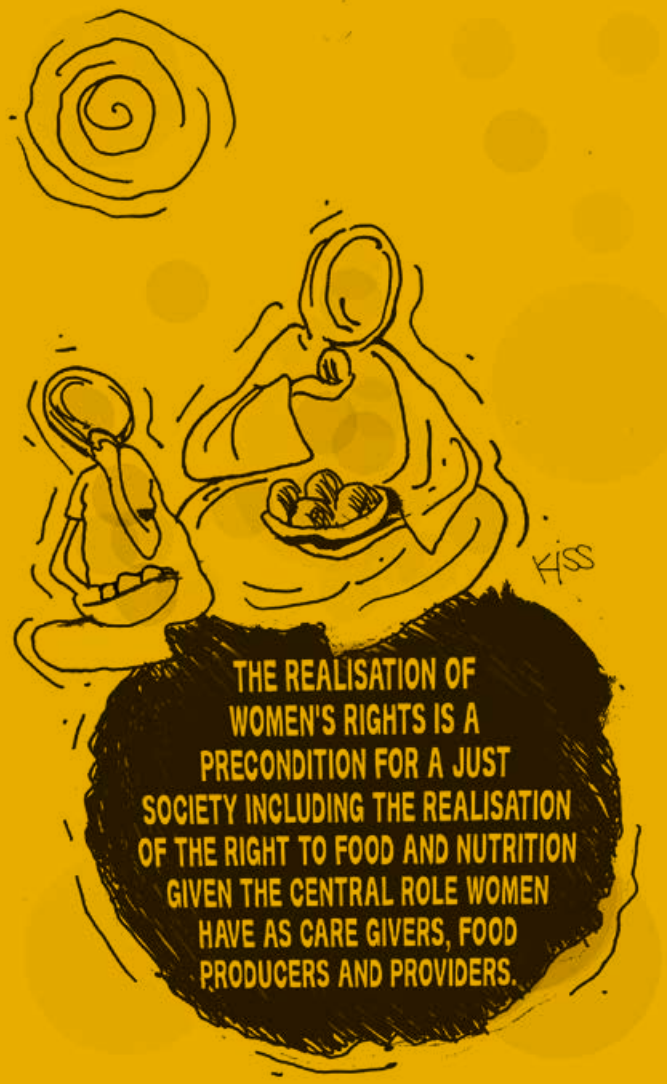
- Actions to make nutrition a priority in the national agenda, such as through growing nutrition champions such as MPs, making nutrition a non-partisan priority taken on board by all political parties around elections, engaging with civil servants, and extensive media and awareness-raising;
- Getting nutrition included in long-term national frameworks and strategies, including constitutions, national development plans, and poverty reduction strategy papers;
- Ensuring adequate Government policies and structures for nutrition, both to ensure effective coordination of nutrition across Ministries, as well as nutrition-specific policies;
- Engaging in nutrition planning, as part of multi-sectoral nutrition structures that can serve as a basis for mutual accountability on action plans and agreements;
- Regular civil society reports on progress in nutrition, as developed by the IDI in Peru (Case Study 4.1), can help promote continual progress in implementing nutrition plans. Reports against progress towards international or regional commitments (such as Nutrition 4 Growth – Case Study 4.6) can also promote greater accountability, particularly where progress is compared across similar countries in a region;
- Budget analysis and advocacy to ensure adequate resource allocation for nutrition (as in the Malawi, Tanzania, Zambia and Zimbabwe case studies);
- Nutrition planning at the sub national level is also essential, with CSAs participating in multi-sectoral planning structures responsible for overseeing planning, budgeting and delivery;
- Expenditure tracking, at national and sub national levels, to review how funds in the budget were actually allocated, disbursed and spent;
- Performance management tools, such as community scorecards, social auditing, or consensus-based monitoring (see Case Study 4.1);
- Engaging with Government systems for public integrity and oversight, such as Ombudspersons or Audit offices. Community scorecards, for example, were **shown** to be more effective when connected up to the Government's own accountability systems;
- Promoting the accountability of the private sector, within national laws and regulations (such as codes on breast milk substitute marketing, as in Sri Lanka in Case Study 4.7 or the SUN CSA in Myanmar), or to their own commitments (e.g. within Nutrition for Growth). Reports comparing companies across a sector can also be powerful (such as the **Access to Nutrition Initiative**);
- Promoting accountability of donors and other actors, such as around their commitments at the Nutrition for Growth summit (Case Study 4.6);
- Walking the talk and promoting CSAs' own accountability, particularly forward accountability to beneficiaries, as well as internal accountability to CSA members and peers, and upward accountability to government, donors and other power holders. Several guides exist on how a civil society organisation can strengthen its own accountability (from **Oxfam**, **CIVICUS**, **CARE Peru**, and **SUN CSN**).

A combination of many of these tools are illustrated in the case studies, from Peru (consensus based monitoring), Zimbabwe (engaging MPs), Malawi and Zambia (budget analysis and advocacy), Tanzania (tracking funds at subnational level), donor level (Nutrition 4 Growth scorecard), and Sri Lanka (private sector and the code of conduct for marketing breast milk substitutes).

The Social Accountability System



[3] This diagram was developed by the **Public Sector Accountability Monitor (PSAM)** in South Africa, as part of their training programme on the Social Accountability System.



Recommendations

The lessons from these case studies, as well as the wider review of lessons around accountability, lead to 10 recommendations for CSAs to consider as they take this work forward:

1. ***Accountability is about holding to account on commitments:*** Nutrition advocacy work needs to include ensuring SMART national, regional and international commitments on nutrition by Governments, donors and private sector, including around the 2016 Rio follow-on summit on Nutrition for Growth;
2. ***Nutrition accountability needs a multi-stage, multi-level & multi-sector approach:*** CSAs will achieve greater impact if they work around different parts of the whole Social Accountability system, rather than just on one specific accountability tool, at one level or with one sector;
3. ***Nutrition accountability needs a multi-stakeholder, consensus-building approach:*** a non-partisan approach helps bring in people from all sectors and levels, into a collective force for more effective nutrition efforts and results;
4. ***Accountability needs a multi-media approach:*** CSAs should apply creative communications strategies, using traditional and social media, to ensure consistent messaging and broad outreach;
5. ***Accountability needs the right data:*** CSA advocacy is needed for greater investment in more frequent data collection and transparency on nutrition outcomes, results, service coverage, budgeting and expenditure, including participatory data collection involving civil society actors;
6. ***Multiple strategies for accountability that evolve over time are needed to respond to the changing context:*** Nutrition accountability strategies need to be adapted over time, adjusting to changes in the context and the opportunities and bottlenecks that emerge, and based on deep understanding of the local context, and the power and incentives of different actors;
7. ***Use different tactics for engagement:*** CSAs will need to apply a mix of tactics in their accountability work, depending on the local context, promoting both collaboration, consensus-building and mutual accountability, but also being aware of the power of activist allies to play a more confrontational role, where significant blockages arise;
8. ***Connect with enforceability mechanisms within Government:*** CSA accountability work needs to link civil society "voice" with the "teeth" of systems within Government; (such as internal performance management systems within Ministries, audit, legal systems, etc.).
9. ***Increasing the focus on women in nutrition accountability processes is essential:*** Ensure a specific focus on gender and nutrition in all your accountability and advocacy work.
10. ***Promoting accountability means also "walking the talk" on accountability:*** CSAs need to "Walk the talk" and ensure their own accountability. CSN should promote greater sharing of experiences and tools for accountability of CSAs.

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2. The Importance and Value of Accountability for Nutrition

2.1 What does accountability mean for the SUN CSN?

A particularly useful definition for SUN civil society networks is that **accountability ensures that actions, decisions, programs, and policies made by public officials and other decision-makers are (1) implemented, (2) meet their stated objectives, and (3) respond to the communities they aim to benefit** (Global Health Visions, 2015). This highlights that while accountability applies to Government, it is also relevant to other key actors working on nutrition, such as the private sector, donors, UN agencies, and civil society organisations themselves.

There are two main components of accountability:

Answerability - the obligation to provide an account, justify actions and decisions, and the right to get a response; and

enforceability - ensuring that action is taken or redress provided when accountability fails (Schedler, 1999). Importantly, enforceability is not only about penalties or consequences when responsibilities are not fulfilled, but also the ability to take measures to put things right.

Accountability systems can be "horizontal" – systems within the state itself, such as the reporting and management systems of Ministries and other state bodies, the audit office, the judicial system, and the parliament. They can also be "vertical" – led by citizens or civil society organisations (see figure below, from UNIFEM, 2008). This report focuses primarily on this second type, but highlights the importance of connecting citizen accountability efforts with those systems within the state. The concept of "social accountability" refers to a form of accountability from actions by citizens or civil society organisations aimed at holding the state to account and making it responsive to their needs, as well as from efforts by government and other actors (media, private sector, donors) to support these actions (UNDP, 2010, Grandvoinnet et al., 2015). Accountability work includes advocacy, coalition-building, and monitoring agreed results.

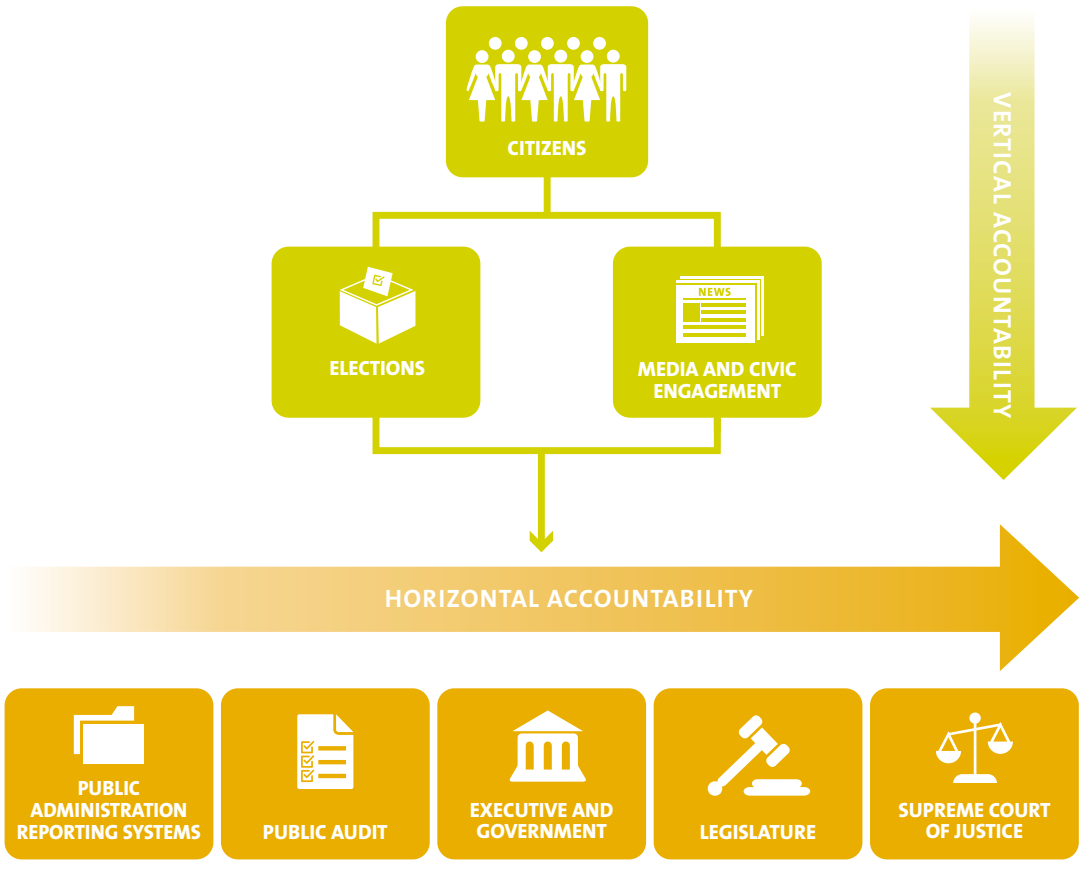


Figure 1.1 Vertical and Horizontal Dimensions of Accountability

© Stuart Ramson, UNICEF Uganda.

Accountability within the SUN Movement:

Accountability for the SUN movement relies on the ability to "account" for commitments, responsibilities and actions, and is facilitated by clear expectations, data and measurements. This builds on one of the SUN Movement's fundamental principles of engagement, "**mutual accountability**", whereby all stakeholders feel responsible for and are held collectively accountable to joint commitments. This means, as the SUN Strategy points out, that "hard" forms of accountability, such as formal inquiries, legal action or censure, would rarely, if ever, be resorted to, as they would be largely incompatible with the spirit and ethos of the Movement, and arguably be of limited use for the Movement's purposes. Rather the SUN focuses more on consensus-based mechanisms, generating shared agreements across nutrition stakeholders to take actions to put things right where responsibilities are not yet being fulfilled.

The SUN Movement 2016-2020 Strategy outlines six important elements for accountability: i) **aligning** on goals, objectives and respective contributions; ii) Building and strengthening the systems that provide **feedback** on progress; iii) Transparently **sharing progress**; iv) **Celebrating** successes and examining how to share, scale and replicate them; v) Agreeing how to course correct when actions are not happening or not having the desired outcomes; and vi) Working largely by **encouragement and support, and with a shared responsibility** for the commitments made in the overall strategy and work plans of the Movement.

2.2 Global learning on accountability and its relevance for the SUN civil society alliances

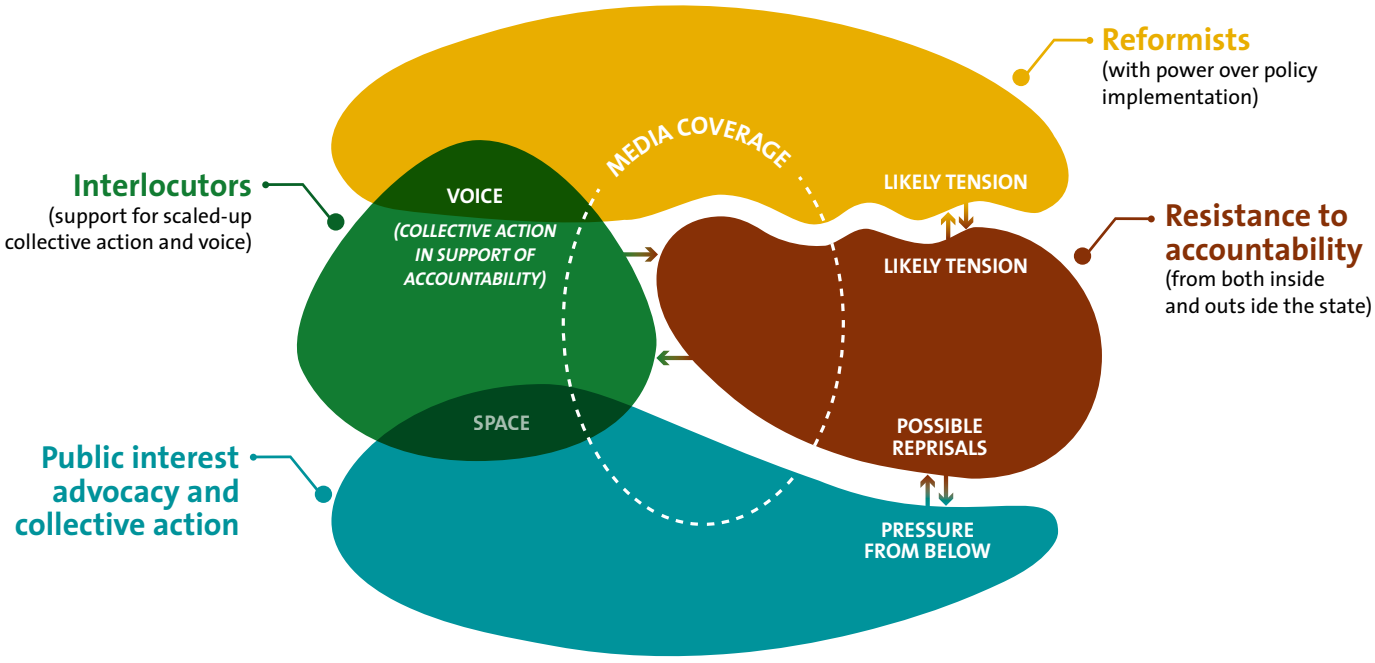
Emerging issues from research and learning on accountability highlight six main lessons:

g) Information and transparency alone does not trigger action, either by citizens or by the State (**Fox, 2014**). SUN civil society alliances (CSAs) are well aware that providing information alone, on commitments or funding or progress, rarely achieves significant change.

h) Successful accountability work needs to focus not only on citizen action, but also state action (**Fox, 2014**). Jonathan Fox describes this as "voice" (citizen action) needing "teeth" (government's own accountability systems – i.e. their incentives or negative sanctions where there is non-compliance) in order to "bite". But as he also concludes, "teeth may not bite without voice". In other words, citizen-led and state accountability systems need each other to achieve results. This is referred to as working in "sandwich strategies", where pro-accountability reformists from both state and civil society are prepared to engage in a coalition to work together. This goes beyond much traditional work on accountability of state to civil society, into the area of mutual accountability, and is highly relevant to how the SUN Movement works. However, given that there will be anti-accountability forces both on the state and civil society sides, resistance and perhaps even conflict is expected. For CSAs, this means building allies within the state sector, with both sides being prepared to stand up to barriers to accountability within their own sector, if needed.

The Sandwich Strategy

Opening from above meets mobilisation from below.



Source: revised version of diagram in fox (1992-202)

i) Tactical approaches to accountability, focusing on the application of "accountability tools" at one level, have limited effect. Applying a single accountability approach - such as a scorecard in a district, or budget analysis at national level, may bring about immediately improved results, but these are unlikely to be sustainable over time without more 'strategic' approaches (see table below, adapted from **Fox, 2014**). CSAs need to be working, therefore, at multiple levels (from local to national and international), engaging multiple sectors, and using different accountability tools and processes.

Tactical approaches to accountability involve:

- Bounded interventions
- Limited to society-side voice
- Assume that information provision alone will inspire collective action with sufficient power to influence public sector performance
- Are bounded to local arenas

Strategic approaches involve:

- Multiple, coordinated tactics
- Enabling environments for collective action, to reduce perceived risk
- Citizen voice coordinated with governmental reforms that bolster public sector responsiveness (voice plus teeth)
- Scaling up (vertically) and across (horizontally)
- Iterative, contested and therefore uneven processes

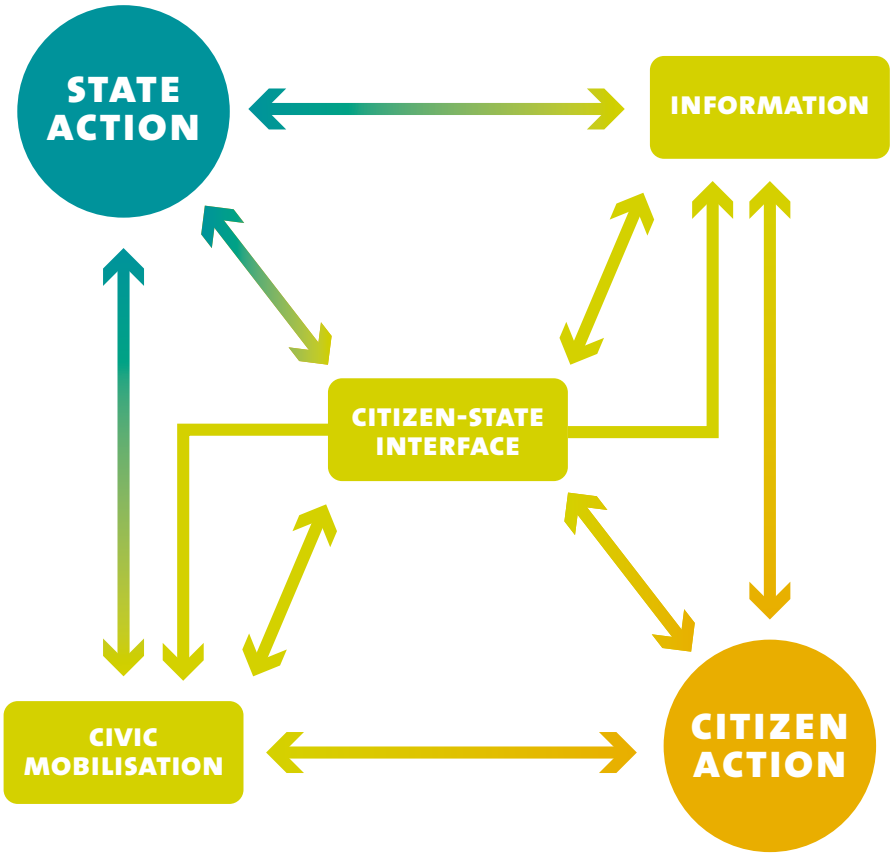
j) Citizen engagement has better outcomes if undertaken with and through local associations or movements, rather than only through spaces opened up by the state for citizen engagement (**Gaventa and Barrett, 2010**). Participation in formal governance spaces, especially when not backed by collective action, can result in "tokenistic" forms of participation, to appear to be allowing participation without any real involvement in decision-making. *"Used in isolation from other strategies, they may not contribute significantly to positive change"*. For citizens to successfully pressure and support government accountability, capable, autonomous and representative grassroots organisations and social movements need to drive collective mobilisation (**Halloran and Flores, 2015**). This highlights the need for SUN CSAs to continue to ensure greater engagement of social movements and representative organisations (such as smallholder farmers groups or women's movements) within their membership and in their advocacy and accountability work on nutrition. This is also a good strategy to enable you to have reach across the country so you can bring your accountability efforts to scale.

k) Without efforts to ensure inclusion of under-represented voices, accountability interventions can result in reinforcement of existing power relations (**Gaventa and McGee, 2013**). Additionally, when participation is induced, such as donor-induced local level committees or networks that are created in order to access aid funds, these spaces are more likely to be captured by elites (**Rao and Mansuri 2013**). This reinforces the recommendation of the SUN Independent Comprehensive Evaluation that the SUN needs to pay particular attention to ensuring that national plans, CRFs, data gathering and inclusion activities pay particular attention to the nutritional needs of women and women's empowerment.

l) Work to promote accountability has to be adapted to different local contexts, and to changes in the context over time, based on a deep understanding of those contexts (**O'Meally, 2013**, **Tembo, 2013**). What is possible and appropriate in a context of significant openness to state-citizen engagement and high government capacity will be very different, for example, where space for citizens to engage is more closed or capacity is weak. This means civil society alliances should not take an example from another context – including those highlighted in this Think piece - and simply apply it in their context. Working with all actors to understand opportunities and constraints will enable the right tools to be selected, adapted and applied. This requires ongoing analysis of the context, iterative planning, and adjusting strategies as you learn what is working, as the context changes, and as new opportunities arise.

These lessons and recommendations come together in the World Bank's description of social accountability as the interplay of five elements (**Grandvoinnet et al., 2015**), as shown in the figure below. Information, civic mobilisation and the state-citizen interface are seen as 'levers' which can be initiated by either state action or citizen action, to bring about a demand for the other elements of accountability:

- ***Citizen action*** involves making demands for good performance from the state. Much work by CSAs focuses here on bringing together citizens and organisations, to help them work together to take collective action.
- ***State action*** may be positive or negative, and may even be proactive in looking for engagement with citizens[4]. CSAs will need to understand the context of state action, and seek to influence it towards a positive response to citizen action.
- ***Citizens need usable information,*** from citizens themselves or from the state. CSAs can encourage the state to make such information available (as happens within the **Open Government Partnership**), generate information themselves (see the Sri Lanka Breast Milk Substitute case study) or 'translate' information for citizens (see the Malawi and Zambia Budget Analysis case studi point is appointed by the CSA through a process that generates trust within the membership, and that the appointment is also acceptable to and trusted by state actors.
- ***Citizen-state interface:*** Bringing state officials and citizens (whether individuals or collectives) together often needs "interlocutors" who can help bridging power or culture gaps between citizens and state officials and creating a credible interface. This can be an important role for the CSAs, holding the space fairly and justly, so that both state and citizen movements trust their integrity (see the Peru Consensus-Building Forums case study). This also makes it essential that the CSA focal point is appointed by the CSA through a process that generates trust within the membership, and that the appointment is also acceptable to and trusted by state actors.
- ***Civic Mobilisation*** builds people's awareness of their rights, increases pressure on the state to respond and provides feedback to the state for its own accountability system. CSAs can play an important role, reaching out to social movements and triggering and supporting citizens' voice, particularly amongst vulnerable or marginalized individuals or groups (see also the **SUN guide** on social mobilisation, advocacy and communication).



[4] In Rwanda, for example, where 'accountable governance' is one of the four thematic areas in the Economic Development and Poverty Reduction Strategy 2. Citizens' participation is central to the government's commitments to ensure efficiency in deploying resources and delivering services (Radostina et al., 2013).

2.3 Who is accountable, for what?

Given the array of different actors involved in scaling up nutrition (not only government, but also donors and UN agencies, civil society organisations, private sector agencies, academics, Members of Parliament, and the media), at both national and international levels[5], there are many different levels of accountability relationships that CSAs can work on. These can be seen at three levels:

- ***Towards responsibilities at the country level*** – CSAs are working with other SUN networks in developing national nutrition plans and a Common Results Frameworks (CRFs), which serve as the foundation for accountability work, including tools and processes to monitor progress on plans, measure impact and undertake regular financial tracking. The Ethiopia National Nutrition Program (NNP II 2016-20) for example clearly defines the roles and responsibilities of each sector with an accountability matrix and costing for all activities. This needs to include work to promote accountability at both national and local levels, of both state and other actors (including the private sector, for example around the International Code of Marketing of Breast-Milk Substitutes).
- ***Towards commitments*** – CSAs can help scrutinise the ambition, relevance and level of fulfilment of commitments, whether made at global (see Nutrition 4 Growth case study) or national levels (see Peru and Zimbabwe case studies). This can be using their own data, or that provided by government, or from global reports and indices, such as the **Global Nutrition Report**. Working with politicians and electoral candidates can also help ensure these commitments are more sustainable, and last beyond political cycles (see Section 3.1.1.1, below).
- ***Towards mutual accountability within the SUN*** – The approach to accountability within the SUN Movement includes accountability of each member to their own primary stakeholders, as well as to fellow members[6]. At a global level, for example, the SUN Civil Society Network is promoting its own accountability to its member networks, through the **transparent** review of progress against work plans, while World Vision and Interaction are self-reporting on how they are making progress on their own SUN commitments (te Lintelo, 2014). At a national level, inclusive CSAs with democratically elected leadership and effective internal accountability mechanisms are the legitimate actor to sit at the multi-stakeholder discussions, on behalf of their members. An important component of mutual accountability involves setting up strong policies and mechanisms for preventing and managing conflicts of interest, which is why the SUN movement is prioritising the establishment of such policies and mechanisms for multiple stakeholders, as part of the multi-stakeholder platform efforts (see Toolkit **here**).

There are also certain stakeholders who are critical for promoting accountability of multiple actors at multiple levels, such as the media, Members of Parliament or public figures who are "nutrition champions", and hence they may warrant a specific focus of engagement. Ultimately, accountability needs to be towards citizens themselves, in particular households with children at risk of stunting, which highlights the importance of social movements and representative organisations playing an active role in all the accountability work of the CSAs.

[5] See for example Table 2 in **te Lintelo, 2014**.

[6] The SUN Movement strategy 2015-2020 notes that different stakeholders within the Movement already have primary lines of accountability, e.g. institutions to their boards and donors, Government Focal Points to their governments and Multi-Stakeholder Platforms, and Networks to their Steering Committee. It also points out that this does not preclude accountability of these groups (in addition to the SUN Coordinator and the SUN Movement Secretariat) to the wider Movement.

2.4 Why is accountability important and what are we aiming to achieve?

The first two objectives of the CSN Strategy for 2016-2020 highlight the critical role of civil society in advocacy and accountability:

- **Objective 1:** Civil society successfully drives and contributes to effective and coordinated national and global advocacy efforts;
- **Objective 2:** Civil Society plays a key role in strengthening accountability of all stakeholders.

Advocacy is required to ensure clear prioritisation, commitments, policies, plans, programs, resources and institutional capacities for nutrition – and accountability work is required to ensure that these are delivered on, and meeting the needs and rights of the most vulnerable and marginalized. Without advocacy, there is nothing to hold power holders to account for, and without accountability, advocacy gains may not be put into effect[7].

Accountability, therefore, is important firstly to ensure that nutrition is politically visible and prioritized, at the highest levels of Government – and that it can stay this way, even beyond political cycles. The need is to build commitment at multiple levels: raising community awareness through civic mobilisation and multiplying champions (MPs, media, public figures) for accountability, so leaders are held accountable for maintaining this level of prioritisation for nutrition. Secondly, accountability can help make sure that this prioritisation has a supportive environment: a clear legal and policy framework; identified institutional leadership set within a prominent, central and cross-sectoral part of government; and sufficient financial resources invested within it. Again, CSAs and their allies then use accountability tools to ensure these policies are lived up to, and resources are effectively and fairly allocated and spent.

Third, CSA advocacy work makes sure that strong and SMART (specific, measurable, achievable, realistic and time-bound[8]) commitments (**Global Nutrition Report, 2015**) are signed up to internationally, or nationally; and that plans and monitoring frameworks – including national nutrition plans and Common Results Frameworks – are developed to help deliver on these commitments. Then, once the coalitions of different stakeholders and from multiple sectors start to deliver on plans, it is the promotion of mutual accountability within these spaces which will help to keep all motivated and on track, and to identify together the actions to resolve and correct the bottlenecks and challenges that inevitably occur. Implementing these agreed plans should result in increased implementation of quality nutrition services and support, which needs data and information, from government or generated by civil society, to be able to know whether efforts are achieving the desired results. Accountability processes are thus critical for ensuring monitoring of nutrition results and impacts.

Ultimately, accountability needs to be established towards the people that suffer from malnutrition (the rights holders). As well as being accountable as civil society ("forward accountability"), this means promoting the accountability of Government and other power holders towards "direct beneficiaries" (such as women's groups, mothers clubs, farmer co-operatives or youth groups). This involves CSAs working to ensure that nutrition interventions reach those most in need of them. However, as many initiatives get captured by elites, fail to reach the most disadvantaged, or are impacted by corruption or lack of competence or resources, accountability efforts are essential for shining a spotlight into those darker corners to highlight where things are not on track. It is also those darker corners that show how important it is to keep collective focus on addressing those specific issues that contribute to or are underlying causes of malnutrition in your country, including issues of gender and equity[9].

[7] See also the SUN CSN Advocacy Toolkit (SUN civil society network, 2015 – **here**)

[8] Some definitions of SMART prefer "ambitious" for achievable, which fits with the analysis in the Nutrition 4 Growth case study – after all, you can easily commit to not doing anything at all.

[9] In line with the SUN Movement Strategy recommendation for partners to work together to define the agreed approaches on equity/gender/climate change, and to develop indicators to help track progress.

2.5 The key role of civil society to promote accountability

For the SUN Movement "Civil Society stands as the critical bridge to ensure that the policy, plans and pledges are implemented in the interest of the people and reach the populations most vulnerable to malnutrition and the drivers of all forms of malnutrition. Civil Society has an essential watchdog role to play to ensure accountability and delivery of commitments." CSAs are at the heart of advocacy and accountability work to put nutrition on to the agenda, ensure sustainability of nutrition prioritisation beyond political cycles, build relationships with key enablers (such as the media or MPs), and gain commitments, as well as holding to account on those commitments to ensure sustainable nutrition prioritisation. At the same time, the coalitions and movements that CSAs are part of within the SUN Movement are highly collaborative (see the case study on the Consensus-Building Forums in Peru). Because each stakeholder has a role to deliver something – with CSA members often involved in nutrition specific or sensitive work at local levels, rather than only playing the role of holding others to account – the SUN emphasizes a culture of mutual accountability and a partnership working style (with a 'logic of participation'), rather than "hard" accountability or enforcement mechanisms ('logic of compliance') (**te Lintelo, D, 2014**).

However, it is important to bear in mind that civil society is not homogenous, and careful attention needs to be put on which civil society actors to engage with, in order to be sure that the focus is on 'the interests of the people' who are the most vulnerable and marginalized. The importance for CSAs of reaching out to grassroots social movements cannot be underestimated. Research suggests that "transformative social change tends to come not from apolitical and technocratic NGOs, but from politically influential actors, such as social movements or religious groups" **(de Gramont, 2014)**. Or as others put it "... when national movements or civil society coalitions are able to link to local grassroots movements...such relationships amplify the voice of local actors while connecting national organisations directly to citizen actions and needs" (**Halloran and Flores, 2015**). Since the risk of elite capture is ever-present, within both formal NGOs and reform champions, it is representative and membership-based organisations, growing out from the self-help activities of excluded groups in society, which can help to maintain pressure and keep a pro-poor focus. Of course, elites can also capture those spaces, so it is necessary to ensure accountability processes within social movements too.

Finally, the relationship between citizen action, civic mobilisation and the other drivers of social accountability, is captured within the social accountability framework in section 2.2 above. Civil society is clearly pivotal to three of the key parts of that framework (citizen action, civic mobilisation, and in the state-citizen interface), but CSAs also actively contribute to a fourth (information), and play an important role informing and mobilising pro-reform actors within the fifth (state action).

Community Meeting on a 1000 day approach

Hundreds of children, adolescents and parents participated in the community meeting in East-Yangon before the election. The meeting was part of the campaign #VoteforChildren, arranged by Save the Children and UNICEF. The campaign advocates for an increase the government budget share for education, health and social welfare from 9% to 15%. © David Brændeland, Save the Children

2.6 The opportunities in the current international context

The Sustainable Development Goals (SDGs) agreed in September 2015 provide an important framework for civil society actions to promote accountability for nutrition. Beyond the specific SDG Goal 2 ("End hunger, achieve food security and improved nutrition, and promote sustainable agriculture"), there are many ways in which improving nutrition will contribute to the Post-2015 development agenda (see Table 1.1. in the - **2015 Global Nutrition Report**). This provides openings for ensuring nutrition-related activities are included in national and international plans around the SDGs. Targets 16.6 ("Develop effective, accountable and transparent institutions at all levels") and 16.7 ("Ensure responsive, inclusive, participatory and representative decision-making at all levels") also create a strong enabling environment for CSA work to promote accountability. The increased emphasis on expanding data and information around the SDG targets will also open up opportunities for CSAs to engage in collecting or verifying SDG data, at national, regional or global levels, or undertaking citizen-driven monitoring, once the specific SDG indicators have been agreed in 2016.

There are also many international agreements that exist where SUN Movement governments have signed up to commitments related to nutrition. These include the Second International Conference on Nutrition (ICN2) **Framework for Action**, the Nutrition for Growth **Compact** in 2013 (to be followed up in 2016), the 2012 Sixty-Fifth World Health Assembly (WHA) **targets** on maternal, infant and young child nutrition, Every Woman Every Child **commitments**, the **Zero Hunger Challenge** launched by UN Secretary-General Ban Ki-moon in 2012, and the Committee on Food Security (**CFS**). Regional agreements, such as the African Union 2003 Maputo Declaration or 2014 **Malabo Declaration**, or the African Leaders Malaria Alliance (**ALMA 2030**), also provide further opportunities for CSAs to hold actors at the national level to account for commitments. Which of these are most relevant for CSAs to focus on in a specific national context? This depend on different factors, including which commitments have higher visibility or credibility within the country, the actions that other civil society allies are carrying out that you could join with in order to increase the pressure for fulfilment of commitments,[10] the broader local political context, and in particular whether global or regional agreements are considered to have greater importance.

Global reports comparing progress, achievements and fulfilment of commitments related to nutrition can also provide useful entry points for CSA work on accountability at national level, particularly where the data used is seen to be credible by national nutrition stakeholders. Examples include IFPRI's Global Nutrition Report (**GNR**), the Institute for Development Studies' Hunger and Nutrition Commitment Index (**HANCI**[11]), IFPRI's Global Hunger Index (**GHI**), and the Access to Nutrition Foundation's Access to Nutrition Index (**ATNI**).

[9] In line with the SUN Movement Strategy recommendation for partners to work together to define the agreed approaches on equity/gender/climate change, and to develop indicators to help track progress.

[10] For example, if there was a broad civil society campaign focusing on the AU Malabo declaration's commitments, to allocate at least 10% of public expenditure to agriculture, that would also provide an opportunity to promote the commitment (also in the Malabo Declaration) to bringing down stunting to 10% and underweight to 5% by 2025.

[11] See for example this IDS paper on using the HANCI in Tanzania so support in-country advocacy with MPs.

3. How Civil Society Can Promote Accountability

There are a wide array of accountability tools available for civil society organisations to hold different organisations to account, whether government, private sector, donors and international organisations, or civil society themselves. For sources of these tools and guides on how to use them, see **CIVICUS's Participatory Governance Toolkit**, the **World Bank's Social Accountability Sourcebook**, and the **SUN's own expanding Resource Centre**. The particular accountability tools and approaches that are most relevant will depend on the local context and culture, on the legal and institutional framework, on the incentives that determine how policy makers and bureaucrats operate, as well as on your relationships with other actors and your own legitimacy. For example, if your context is less open to civil society engagement you may need to moderate some of your approaches, selecting tools that can over time work to build trust towards opening up more space for citizens' engagement. Framing CSA work as supporting that of nutrition champions in Government can help open up space in more constrained contexts, where civil society organisations can enable key messages on nutrition to reach wider audiences, or can expand nutrition services through their own programmes, or can advocate for changes that officials would like to see (such as increased budgets for nutrition programmes), but cannot publically call for.

Rather than presenting a recipe for accountability, we highlight in this section a set of accountability ingredients, to be combined and adapted depending on your local context. Some are relatively simple to apply, while others require more specialist technical knowledge (e.g. around budget monitoring). All require some significant effort and investment of time, so need to be planned carefully, within the capacities and resources available within the CSA membership.

Whatever your context, one useful way of thinking about accountability is as the **monitoring and evaluation process of the overall system** that is trying to deliver according to the overall nutrition commitments, targets and policies in the country.

The temptation with accountability tools is to pick them up and apply them to only one part of the system, and from that information draw your conclusion. For example, for government systems, you might carry out budget analysis and assume that if you help ensure nutrition is adequately included in the budget, then things are fine. Or you may start at the local level, using scorecards or citizen reports cards to look at what is happening on the ground: are children receiving their vitamin supplements? Are farmers getting the agreed agricultural inputs and support for diverse crops? Are health centre staff giving adequate support on breastfeeding? And so on. If these are working for the poorest people, then you probably can conclude that the overall system is working in this particular local area. However, if the scorecard exercise reveals poor practices at the local level, can you then assume that the problem you have found is due to a problem at that local level where you have applied your scorecard? No, you can't.

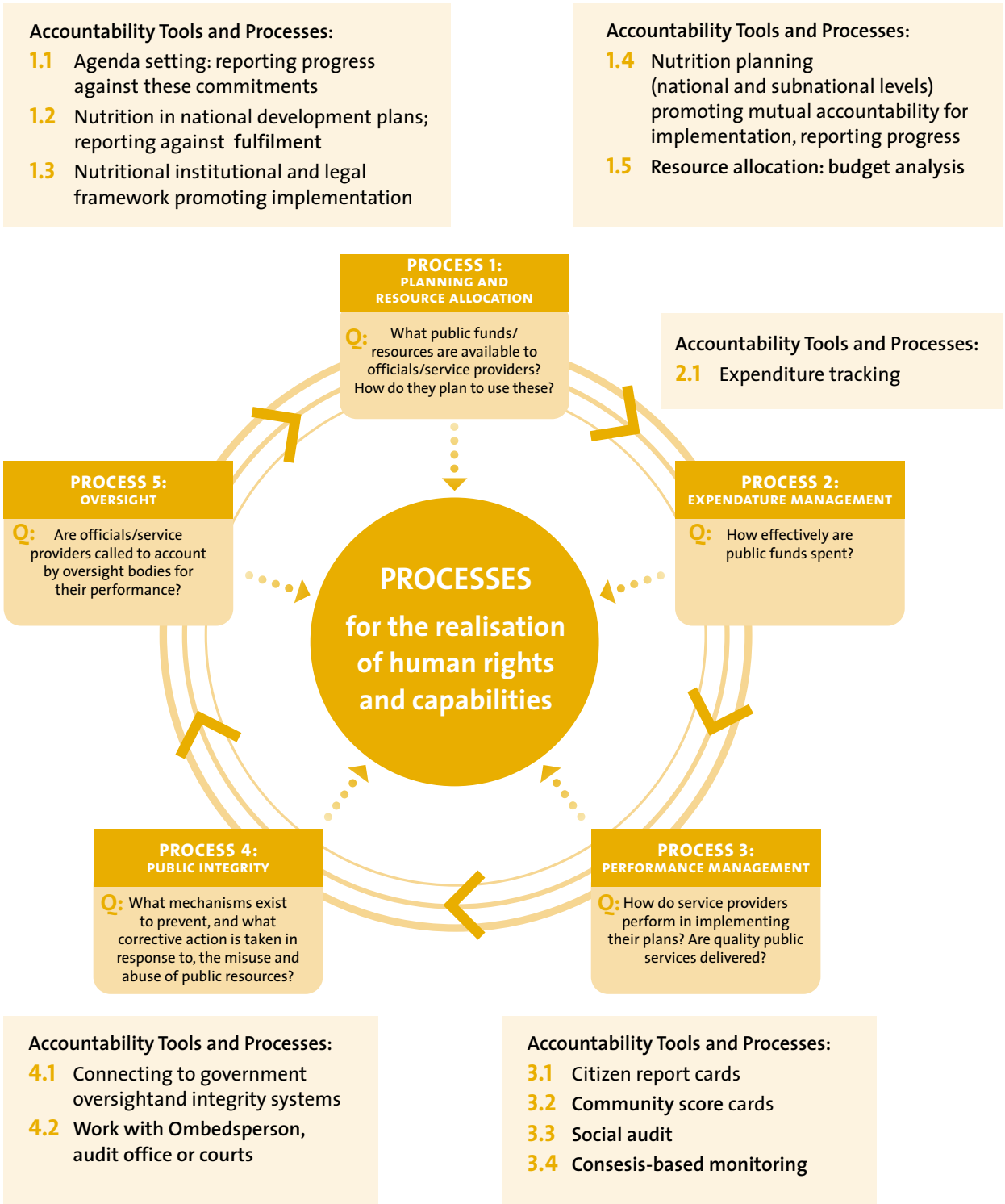
When you start to look at the whole system – the planning & budgeting, the systems for managing expenditure and performance, the oversight and feedback systems - you realise that there are many places where things may have broken down. If nutrition was not made a priority in national plans, then it won't be in the budget. Or perhaps it was in the budget, but wasn't spent according to the budget, or in the parts of the country where it was most needed. Or it was spent, but due to competence issues or staff shortages, it was not done well. And so on. So for effective accountability you need to know where the system has weaknesses – and this means that you need to work to hold actors to account across the whole Social Accountability System (SAS)[12]. The figure below shows these stages in the process, and the specific accountability processes and tools that CSAs can use at different parts of the cycle.

Nigeria © Dorothy Sang, Save the Children

[12] This diagram was developed by the Public Sector Accountability Monitor (PSAM) in South Africa, as part of their training programme on the Social Accountability System.

This system is slightly different when applied to different actors and different contexts, since each will plan and budget differently. But the overall cycle of planning and delivery is more or less the same, whether within Governments, donors, private sector or even civil society organisations[13]. We will now look in turn at government, private sector, international donors and agencies, and civil society itself.

The Social Accountability System



[13]The World Bank's **Social Accountability Sourcebook** (Table 1, page 5), for example, maps accountability processes against four parts of the planning and implementation cycle: Policies & Plans, Budgets & Expenditure, Delivery of Services & Goods, and Public Oversight. The United Nations Human Rights Commission, in **Who will be Accountable? Human Rights and the Post-2015 Development Agenda** (Figure III, page 35), proposes a similar framework: 1. national plans of action, 2. Budget allocations & expenditure, 3. Monitoring progress & priorities, 4. Accountability through judicial, administrative & political remedies.

3.1 Promoting accountability of government

3.1.1 Government policies, planning and resource allocation

In this section, we look not only at nutrition-specific plans and budgets, but also the broader agendas, structures and policies, which determine how nutrition in particular is planned and budgeted for, and then implemented, monitored and overseen. For each element, we highlight some of the tools and processes used by civil society to ensure nutrition is adequately taken into account. Not all of these actions are exclusively accountability processes, but they are included as they are an essential part of the whole accountability system.

Box 3.1 - Parliamentarians as nutrition champions

The Zambia All Party Parliamentary Caucus on Food and Nutrition (APPCON), a platform for inclusive, non- partisan collaboration with civil society and media on issue-based action on nutrition, have been building MPs' capacity, to make them effective in their roles in nutrition policy and legislation development, budgetary and oversight roles. In late September 2015, at a regional parliamentarian meeting in Namibia with 14 Southern African countries represented, parliamentarians called for the APPCON initiative to be replicated in other countries at regional and continental level. Once established, such groups of MPs can use their position to influence government action on many levels.

3.1.1.1. Agenda setting:

Firstly, you need to get nutrition on to the broader agenda as a national priority, so that Government wants to work on it. This can be undertaken partly through raising public awareness through media campaigns and civic mobilisation (see **SUN's In Practice: Social Mobilisation, Advocacy & Communication for Nutrition**). Wherever possible advocacy and awareness-raising is best approached in a **non-partisan manner**, so that once nutrition is on the agenda, it stays there regardless of any future changes in Government: it is sustained beyond political cycles. This can include:

- Growing Nutrition Champions, such as First Ladies, prominent media figures, Members of Parliament (see box 3.1, and the Case Studies on Zimbabwe and Malawi), community leaders or traditional and faith leaders, and celebrities. All provide increased public visibility for nutrition issues in different spaces in a non-partisan manner. To be certain that your efforts achieve results, pin the Nutrition Champions down to a clear commitment (such as Malawi's Nutrition Pledge Card, pictured to right); and for those champions who have leverage in specific spaces, track how they subsequently behave – for example, for MPs you can u se transcripts of parliamentary sessions, as Zimbabwe CSOs SUN Alliance (ZCSOSUNA) does, to track how MPs raise issues in parliamentary debates.
- Making nutrition an election priority for electoral candidates or for all political parties, and then monitoring that commitment subsequently to make sure it is lived up to (see Box 3.2 for the example from Peru). In Zambia, the CSO-SUN decided to work with parliamentarians to get nutrition integrated within each political party's manifesto; and in 2015 launched a "**Vote Nutrition**" campaign during the Presidential elections. In Guatemala, 300 young people, representing the SUN civil society movement, met with Vice Presidential candidates to raise their priority issues, including those that impact on nutrition, such as teenage pregnancies, early marriage and under-5 malnutrition, and get candidates to sign up to a nutrition commitment.

Box 3.2: Setting targets: electoral candidates

In Peru, Presidential candidates were asked by the Child Malnutrition Initiative (IDI) in 2006 to sign a commitment document in which they pledged to reduce within 5 years, malnutrition in children under 5 years by 5%. They IDI developed 10 recommendations for the first 100 days of the presidency, including the development of a plan and budget allocations, the strategic positioning of nutrition within the governmental structure, and produced yearly reports on how Government was doing against these commitments and recommendations. This was then repeated in 2011 for electoral candidates, this time with a revised commitment to reduce chronic malnutrition by 10% and anaemia by 20% (see pages 17-20 of the SUN In Practice: Social Mobilisation, Advocacy & Communication for Nutrition).

- Engaging with civil servants, who often do not change with political cycles, so that they too can mobilize to advocate for nutrition. In Zambia, for example, the CSO-SUN works to develop relationships and space with technocrat policy makers, who tend to have a longer lifespan than politicians in the government institutions.
- Extensive media and awareness raising efforts. For example, Malawi's **CSONA** celebrated International Press Freedom day with a series of nationally broadcast radio debates featuring parliamentarians discussing nutrition. They have also worked with well-known musicians to write songs and jingles about nutrition. Many CSAs have strong presence in traditional and social media, to raise the profile of nutrition and engage with wider audiences.

3.1.1.2. Getting Nutrition into Long-Term Plans

In addition to nutrition-specific plans (see 3.1.1.4, below), an important approach is to ensure nutrition is adequately incorporated by government into the broader development plans that set the framework for Government action, often beyond the time-frame of one electoral cycle, such as poverty reduction strategy papers or strategies to implement the Sustainable Development Goals. For example, in Peru, efforts were focused on ensuring that the Multiannual Macroeconomic Framework and Multi-Year Social Framework included prioritisation of access to good quality services in nutrition, health and education. In Zambia, the CSO-SUN noted there despite a strong national nutrition plan, this was not leading to medium-term financial resource allocations. So, CSO-SUN engaged in the process of the development of Zambia's 7th National Development Plan (2016-2020). It is doing this in partnership with government and other civil society networks, to build consensus that nutrition should be a central theme within the plan. The CSO Sun has also managed to get nutrition prioritised within the longer-term National Agriculture Plan and the National Social Protection strategic plan. In **Sierra Leone**, the SUN CSA is also a platform for the Global Alliance for Vaccines Initiative, and is campaigning for the right to food and nutrition to be included in the National Constitution. Of course, getting nutrition in the constitution is a difficult and long process and so needs to be complemented with other efforts to ensure nutrition is non-partisan and progress and activities are sustainable. Government and others can then be held to account for these nutrition priorities within such broader plans and policies, through the mechanisms that exist to review progress (such as civil society reports on progress against national plans) or hold to account institutions (such as Constitutional Courts). In Francophone countries, the judiciary system is such that international level commitments must be integrated into the national system, so this can provide another avenue for promoting accountability around nutrition commitments.

3.1.1.3. Ensuring adequate policies and structures for nutrition

For Government accountability systems to work effectively, across different sectors, it is widely recognised that the **nutrition coordination structure** needs to be positioned strategically within government structures, in a body that has the power and mandate to coordinate different Ministries. This means advocating so that responsibility and leadership for nutrition sit at the highest level of government (although not so high that there is limited implementing capacity). In Zambia, the National Food and Nutrition Commission (NFNC) is under the oversight of the Ministry of Health (MoH). As a result, it is limited in the extent to which it can effectively oversee nutrition implementation within other Ministries, such as agriculture or community development. Note here that changes are not always lasting (see Box 3.3. on Malawi).

Adequate Government planning and implementation for nutrition also ultimately requires a strong nutrition **policy and legal framework**. This means pushing for the generation of an appropriate policy framework that is overarching and which enables nutrition to be prioritised across ministries. The Zambia CSO-SUN, for example, analysed the legal and policy frameworks surrounding nutrition in 2014, and identified one particular problem: the National Food and Nutrition Act of 1967 that governed the nutrition sector in Zambia was now very outdated. Upon realising this, CSO-SUN used its advocacy platforms - the media, engagement with policy makers and with the All Parliamentary Caucus on Food and Nutrition (APPCON) - to push, with Government allies, for the Act's revision.

Box 3.3. Win some, lose some

Cross-party consensus on the strategic positioning of nutrition must be maintained, since what has been gained can be lost again. In Malawi, the Department of Nutrition, HIV&AIDS (DNHA) was moved in 2005 from the Ministry of Health (MoH) to the Office of the President & Cabinet (OPC); with the Permanent Secretary of DNHA reporting to the President. This greatly increased the oversight and coordinating functions of DNHA across the sectorial ministries. However, in 2014, as a result of a general election, the DNHA was moved back to the MoH leading to the stalling of the approval process for the National Nutrition Policy & Strategy (NNP&S) and Nutrition Bill.

3.1.1.4. Engaging in nutrition planning

The heart of the SUN process in country is the development of an agreed national nutrition plan, under a **Common Results Framework** (CRF). This process is led by Government, but with active engagement and involvement of different stakeholders, including the civil society platform and its members, as part of a multi-stakeholder platform. Good practice for effectively engaging multiple stakeholders, including examples of how CSAs can engage, is covered in the first SUN In **Practice Brief,** and greater depth on Effective Coalition Building will be explored in a forthcoming In Practice Brief. More than 80% of SUN CSAs are now actively engaged in a national-level multi-stakeholder platform for nutrition – and many also have members that are engaged in similar platforms at regional and district level. Within such spaces there is a strong role for the CSA to encourage the platform to reach clear agreements and action plans, to which they can then hold one another to account (see Box 3.4 on Uganda). For example, Ghana's CSA plays a key role in compiling information on roles and responsibilities of different stakeholder groups to inform the Common Results Framework, while Niger has a nutrition platform with key indicators that go to the President on a quarterly basis.

Box 3.4 Uganda Civil Society Coalition on scaling up nutrition (UCCO-SUN)

In 2011, UCCOSUN members contributed to the formulation of the Uganda Nutrition Action Plan (UNAP). The coalition continued following-up implementation of the plan throughout 2013 and has been selected by the government to sit on an institutional committee to develop strategies to roll-out the UNAP.

To further raise awareness about nutrition, UCCOSUN members participated in orientations of UNAP at local government and community levels, using guidelines developed by the Office of the Prime Minister. About 5,000 copies of the UNAP were printed and disseminated to district authorities to guide them towards allocating adequate budgetary resources to nutrition. Additionally, CSA representatives contributed to debates in three district level budget conferences. However, despite such interventions, due to a lack of a dedicated budget line for nutrition, local government still found it difficult to allocate money for nutrition within other sectoral budgets. After reflection on the issues presented by the CSA representatives, members agreed to make resource allocations for nutrition one of their priority advocacy agenda issues for 2014.

CSAs can also press for national commitments on nutrition, within global or regional processes (such as Nutrition for Growth, or African Union declarations). Reports comparing performance against these commitments can then be used to promote further accountability (see case study 4.6), or they can be used for advocacy and engagement with political leaders and parliamentarians, as CSAs are doing in Malawi, Niger and Zimbabwe, amongst other countries.

These multi-stakeholder alliances serve as important spaces for mutual accountability on action plans and agreements. Where there is openness to civil society engagement, CSAs can ensure they are involved in the annual review applying the **SUN Assessment Guide and Overview of Progress Markers**, to review overall strategic delivery, relationships and the functioning of the multi-sector alliance in each country. They can also prepare their own reports on progress in tackling malnutrition, in the way that the **Peruvian IDI** does on an annual basis, reviewing achievements and challenges, with clear recommendations for actions required to improve effectiveness of efforts over the next year.

Given the need for multiple sectors to work on nutrition, it is also essential for CSAs to engage in the incorporation of nutrition into the plans, programs and agendas of other sectors and networks, both within government and amongst the CSA's own members. For example, nutrition was included in the Peruvian Conditional Cash Transfer Programme, with conditions including that expectant mothers attend their pregnancy checks, take children to growth and development monitoring, and ensure their school attendance. Other networks can be gathering information on performance that is highly relevant for nutrition: the **malaria** scorecard developed by the African Leaders Malaria Alliance (ALMA) includes data on Exclusive Breastfeeding and Vitamin A coverage[14]. Meanwhile, climate change has been identified in the **2015 Global Nutrition Report** as an area that has significant cross-over with nutrition, and is prioritized in the new SUN Movement strategy for 2016-2020. It also isn't possible for CSAs to work on every issue of relevance to nutrition – the area is too diverse. So it can be more efficient to influence other organisations and networks to prioritise nutrition issues within their advocacy efforts. For example, access to timely and relevant information and transparency have been prioritised as very important to spotlight and maintain momentum on nutrition. So working with those civil society and government actors who are engaged in the **Open Government Partnership (OGP)** - which is specifically focused on the issues of transparency, participation and accountability - may make it easier for you to achieve your aims, without having to dedicate a huge amount of time to the process. Similarly, engaging with broader coalitions working on tax justice, for example, would be a more efficient way of working around the need to raise overall Government revenues – and so a larger "pie" to share for nutrition spending – than working alone on such issues.

Nutrition planning at subnational level is another important area for CSA engagement, to generate commitments, plans and structures around which accountability can be promoted. Since nutrition challenges are felt most acutely at the local level, this is the place where it is often easier to mobilise the political will to take action. It is thus very encouraging that over three-quarters of CSAs are working at the subnational level through decentralised structures and efforts (**Scaling Up Nutrition Civil Society Network, 2015**). However it can be a very labour-intensive role if the onus is on the CSA to encourage the setting up of such spaces in each district. Instead, CSAs can encourage government centrally to take on the formal development of district level spaces in which CSA members can then participate (see Tanzania Case study). Once these spaces are operational, then reaching agreements on plans, targets and indicators will provide the environment for holding actors to account. In Malawi, CSONA specifically asked MPs to engage with District Councils (as implementers of the country's nutrition agenda) to prioritise nutrition and allocate resources to nutrition as a priority development area. MPs were reminded of their role in holding their District Councils and sectors accountable by tracking allocations, funding and expenditure for nutrition in sectors and councils. In Peru, the IDI and a broader child rights coalition pushed for specific targets on stunting and anaemia (amongst other areas) to be developed for each of the 25 regions in the country, with electoral candidates encouraged to sign up to agreements confirming these targets.

[14] Tanzania is currently exploring with the African Leaders Malaria Alliance (ALMA) how their scorecard approach could be adapted for use within the nutrition movement.

3.1.1.5 Ensuring adequate resource allocation for nutrition

Budget analysis tools are the accountability tools used to track nutrition resource allocation – and if allocations are not in line with commitments or the level of need, advocate for increased funding (see also this **SUN CSN guide** to understanding a government budgets). Budget analysis takes place at two stages – pre-budget and post-budget. When the pre-budget overview is released, this is checked to see if nutrition is to be allocated sufficient funding across key sectors to be able to deliver on commitments, agreements and any nutrition plans. This analysis can then be used before the final budget is released to push for any amendments. Then once the final budget is released, once more an analysis of the budget will enable you to see if the nutrition resource allocation is adequate. Where it is not, you need to engage in advocacy to hold government to account for its commitments: a clear analysis of the data and facts, checked through conversations with relevant departments, is a strong foundation for mobilising interest and support in your cause.

Budget analysis is now being used widely across the SUN Civil Society Network, since a clear commitment was made by 15 governments in the Nutrition for Growth compact to increase domestic resources for nutrition. Where there is such a commitment to achieve a specific level of financial investment in nutrition, there is then a clear opportunity for SUN CSAs to hold government to account for this commitment by monitoring the level of resources actually being invested by government – and raising awareness of any shortfalls. However even where the government has not (yet) made an explicit commitment to achieving a target of nutrition spending, budget analysis is a very useful way of drawing attention to under-investment, comparing it with other countries' levels of investment, and pressuring the government into setting itself a target. Clear linkages between national budget allocations and international commitments ideally need to be made before those commitments are entered into, so commitments are ambitious but realistic, and CSAs will need to take that into account in their recommendations for future international commitments, including the 2016 Nutrition For Growth summit in Rio. Engaging citizens in this work is also important, as the Alternative Association Citizens Space does in Niger, presenting budgets to citizens, after building their capacity in budget analysis.

Box 3.5 Justifying budget increases in Malawi

Further to the Malawi CSA (CSONA's) budget analysis, the Parliamentary Committee on Nutrition organized a Fact-finding Mission on Nutrition Resource Allocation. When asked why Early Child Development was getting a huge increase in its national budget allocation, Hon John Chikalimba, Chair of the Parliamentary Committee on Budget & Finance, said: *"From my experience, continued engagement and exchange of information between CSOs and MPs at the right time within the budget process is essential. CSONA needs to present at the Budget & Finance Committee and ensure that a roadmap is developed with clear benchmarks that can help MPs to monitor and track nutrition allocations".*

Alternatively, where the government has established guidelines on nutrition resource allocation, such as Tanzania's **National Guideline for Councils for the Preparation of Plans and Budget for Nutrition 2012**, this is also a basis for CSAs, such as PANITA, the Tanzania CSA, to do district level budget analysis to hold the government to account on the use of their own guidelines. The Guideline helps councils to identify the key actions they should include in their annual plans and budgets to prevent and address malnutrition. It is the responsibility of the District Planning Officer to use it in the preparation of the council's plans and budgets. Given the multi-dimensional nature of malnutrition, suggested actions have been identified for all key sectors (health, agriculture, community development, education and water as well as the Planning Department). Where such guidelines do not exist, CSAs may wish to work with national Government to encourage their development, since they provide a clear framework for later accountability work.

The process for undertaking budget analysis is outlined in the Malawi budget analysis case study and is further detailed within the Zambia and Tanzania case studies. SUN CSN has developed guidance that is available here, and initial lessons from this experience is highlighted in Box 3.6 below. Specific tools for analysing the budget in Zambia - developed by the Public Sector Accountability Monitor - from a more general perspective are also available **here**.

Box 3.6 Learning so far on the application of budget analysis

For data-gathering:

- **The capacity to track public financial resources depends on the country's own Public Financial Management System (PFM) – ideally this needs to be robust and backed up by a strong Access to Information law (or context).**
- **Start the process and don't worry about making it perfect.**
- **Be transparent; share the information widely.**
- **Look everywhere for nutrition spending: use this as an opportunity to talk with other sectors on their programmes.**
- **Look at country-specific causes of malnutrition to see what should be included and tracked for nutrition-sensitive approaches.**

To achieve strong results

- **Work politically: Keep the government focal point for nutrition updated on progress and work with Parliamentary Committees so that they are receptive to the results when they are shared – and to keep the issue non-partisan.**
- **Present the budget analysis data together with data on the state of nutrition in the country – breaking this down to regional level if this is being shared with MPs. This then reveals not only any shortfalls in commitment levels but also the urgent situation of nutrition on the ground that the shortfall in spending ought to have been addressing.**
- **Break the data down to district and regional levels where possible, compare it with other budget lines, and track planned and actual expenditure, including timeliness in receipt of funding.**
- **Do a comparable analyses over time in your own country.**

3.1.2 Expenditure management

Even if nutrition spending has been allocated in the budget, it is quite possible that those funds may not actually allocated in practice during the financial year, may not have been spent in line with the budget, or may not reach the activities they are destined for. Expenditure tracking is an accountability tool that allows you to track financial flows at national level, or local level. The Tanzania case study, describing the experience of PANITA, provides a strong example of expenditure tracking. Their Excel-based Nutrition Budgets Analysis & Tracking Tool can be found here. There are also tools for expenditure tracking, developed by PSAM and applied in Zambia, **here**.

There are a series of challenges to expenditure tracking at the national level, including: nutrition-relevant allocations are located under many different sectoral budgets; there is often varying degrees of detail and compatibility in the data; the availability of expenditure information (including from donors) is not always complete; insufficiently disaggregated expenditures; and limited knowledge of nutrition-relevant investments in different ministries.

Key lessons from PANITA's experience in expenditure tracking at the local level includes:

- Getting access to the data from local officials may require permissions from higher up in the system, so it is important to have good relations at each level;
- It can be harder to get cooperation from the council officials where there isn't a District Nutrition Steering Committee, so pushing for such committees to be created across the country is really worth the effort;
- The CSA network needs to have members spanning the country, particularly in those areas most affected by malnutrition – and training CSA members to gather the data is necessary. However, doing the actual tracking can be quite a motivating experience for CSA members, since they get to shine a light on where the system is not working through their own efforts of data research.

3.1.3 Performance management

Performance management accountability tools come in many forms – from citizens report cards at the individual level, to community scorecards and social audits at the community or institutional level. This can also include formal systems for multi-stakeholder monitoring, such as the Consensus-Based Monitoring in Peru (see Peru case study). Within the SUN, sometimes the CSA may initiate such performance assessment processes itself at the local level – or they may use their position within a multi-sector alliance to encourage government to set up its own regular performance assessment process for nutrition. Where government already has its own accessible and transparent internal control systems in place for staff performance, it may be actively looking for feedback from citizens as part of this. The CSA performance management accountability tools can then link "horizontally" into that existing system.

Community Score Cards (CSCs) are a widely applied social accountability and can be very effective. There are many **toolkits** available to explain how to use them. The strongest evidence to date of their effectiveness comes from Uganda, where community scorecards were used by communities to monitor their primary health centres in Uganda (**Björkman-Nyqvist et al, 2013**). A year after starting the monitoring, communities had become more involved in monitoring the service provider, and the health workers were reported as making more effort to serve the community. There had been large increases in the use of the facilities and improved health outcomes, including:

- 13% decrease in provider absenteeism
- 22% increase in family planning use
- 45% increase in health facility deliveries
- 33% decrease in under 5 child mortality
- Significant increase in child weight.

This shows how a CSC can be a strong tool for achieving and documenting improved results at the local level. But how strong a tool is the CSC for securing sustainable improvements in accountability and therefore results throughout the system across the country? A multi-country **analysis by ODI of CARE's use of the community scorecard** as an accountability tool to assess the quality of service delivery in different sectors concluded that the CSC helped to: strengthen trust between service users and providers; improved working practices of frontline providers; reduced corruption; and improved resource allocation, infrastructure construction and rehabilitation. However it also concluded that impacts were "often 'stuck' at the local level and have only translated into national level impacts where they have plugged into existing reform processes" (as had happened in Rwanda).

So, where the CSAs are pushing, as in Tanzania, for the development of District Nutrition Planning Committees, or similar contextually relevant structures, there is a chance that over time these committees could adopt CSCs to improve results everywhere. Until the CSA is operational in each district this type of result will be hard to achieve by applying the CSC alone. However, as seen by **ODI** in the application of the CSC in Rwanda - where the CSC data was shared from the local level up through to the national level (the "vertical integration" referred to by Jonathan Fox), pushing for government accountability systems to link to and learn from the CSC approach - then there are stronger possibilities for achieving sustainable results nationwide.

Social accountability efforts that are fully participative – such as performance monitoring – also have additional benefits: not only do they generate data and put pressure on service providers, they also increase people's knowledge of their rights, and as they engage in holding service providers to account their own sense of empowerment grows. If participative accountability approaches are applied specifically as tools for empowerment of poorer people or of women, then such empowerment in and of itself can have a positive impact on malnutrition (see Box 3.7).

Box 3.7 Empowering women reduces stunting

An IDS study of the Care International SHOUHARDO programme in Bangladesh revealed that the impressive reduction in child stunting rates was brought about substantially by the programme's focus on women's empowerment. The research concluded that the project activities addressing of the structural causes of nutrition – in particular women's empowerment, through solidarity groups – made the strongest contribution to the reduction in malnutrition: with a reduction of stunting of 8.4 percentage points per year for those exposed to empowerment and health interventions, compared to a 2.6 percentage point reduction for those only receiving health interventions. It added that "combining direct nutrition interventions, such as the 13 proposed by the Scaling Up Nutrition initiative, with those that address structural causes – at the same time and for the same households – has the potential to accelerate reductions in child malnutrition at a rate far greater than can be expected from direct nutrition interventions alone".

Social auditing is a tool for participatory monitoring of an organisation or programme in order to improve its performance. In the case of SUN it can be applied to a plan, an organisation or department, or to a single initiative. For example, in Guatemala the National Centre for Economic Research in collaboration with the **Alliance for Nutrition** - an alliance of CSOs, businesses and academia – have been monitoring the Action Plan 2012 for the Zero Hunger Pact. The plan's two main goals are: to reduce chronic infant undernutrition by 10% in a 4-year timeframe; and prevent and mitigate seasonal acute hunger, including deaths. To achieve these goals a 10-point, multi-sector, multi-pronged strategy and action plan were developed and set in motion, under the umbrella of the First Thousand Days, with a specific focus on the poorest districts in Guatemala. To verify whether they were on track with the actions in their plan, the Alliance for Nutrition partnered with a research centre, and has to date undertaken three social audits on progress at the municipal level for a sample of municipalities. Surveys have collected data on the number of hours that health posts were open, staffing at those posts, quality and cleanliness of infrastructure, the level of knowledge of health workers on different nutrition-related issues, amongst other areas. The first survey they carried out in May 2013 as a baseline, with follow-on surveys in November 2013 and November 2014 to see what changes had occurred. This data and analysis was then **presented** to government with recommendations on how to improve the impact of the national nutrition action plan.

Taking multi-stakeholder accountability to the next level of participation, the Peruvian case study provides lessons on **Consensus-based Monitoring** of nutrition, involving Government and civil society in collectively reviewing progress, budgeting and expenditure. The reviews look at issues of equity (are the hardest-affected regions receiving adequate resources per capita), as well as whether the right mix of critical activities within the national Articulated Nutrition Program are being resourced. The Peru case reveals the importance of everyone knowing that nutrition is everyone's responsibility, and of building trust in order to be able to agree between state and civil society which actions are needed to be taken to address issues that are identified. Recommendations can only be made with total consensus: if there is not total unanimity, the issue is not covered in the monitoring report. The system is in turn based on a transparent and regularly updated information system, with indicators of annual progress related to nutrition outcomes and activities, and the financial resources that are assigned, covering both national and subnational levels. This shared information allows both State and civil society to carry out their own analysis, with the quarterly meetings providing a space with equal representation on both sides to assess progress and make recommendations.

3.1.4 Public integrity & 3.1.5 Oversight

Public integrity management is to do with the performance of officials, financial management and procurement procedures, corruption and disciplinary procedures and so on. Whilst internal audit, human resources and the Treasury have the main roles to play in public integrity management, the Ombudsperson, judiciary, Public Services Commission, Parliamentary Oversight Committees and Audit Commission also play their part in monitoring, investigating and prosecuting misconduct, conflicts of interest, corruption and maladministration in government.

Meanwhile, the role of oversight of the executive arm of government – monitoring its decisions and actions and holding it to account for them - is also spread across a number of bodies: Ministry of Finance, legislature oversight committees, the ombudsman (Human Rights Commission, public protector), independent anti-corruption agencies, the Supreme Audit Institution (controller, Auditor General, audit commission), the administrative heads of departments and internal audit committees.

Civil society can play an important role in raising issues of concern with all of these bodies, where they come across instances of the ineffective use or abuse of public resources that are supposed to be allocated to nutrition. CSAs and their members put together the evidence (by using accountability tools), connect it with the responsible part of government and where necessary share it widely and transparently with the wider array of relevant actors. For example, Community Scorecards (see Box 3.7 above) were **shown** to be more effective when connected up to the Government's own accountability systems. MPs also have a strong oversight role and can use information generated through budget analysis, expenditure tracking and performance monitoring to raise issues in Parliament and within the relevant Parliamentary Committees (see Malawi & Zimbabwe case studies for more on this).

Additionally, since these different mechanisms are not always easy for citizens to engage with directly, there is a CSA and member role in helping to connect citizens to these bodies in order to secure their nutrition rights. CSAs also engage with some of these bodies, so that they train up their members to undertake that oversight body's role at the local level. In Peru, for example, a partnership between CARE, ForoSalud - a Peruvian health rights movement - and the office of the Peruvian Ombudsperson trained indigenous Peruvian women to serve as "citizen monitors" of health services. This model not only increased demand for and quality of services at local level, but has been included in national Ministry of Health guidelines for Citizen Health Monitoring. It was also cited as one of eight best practice examples at international level by the Independent Expert Review Group (iERG) for Information and Accountability for Women's and Children's Health (see page 27, **here**). Save the Children and the Civil Society Alliance for Nutrition, Nepal (CSANN) is also currently developing an Ombudsperson Model, that will be applied to track and monitor the progress in implementation of National Multi-Sector Nutrition plan. The model will be tested in one district, and cover both budgetary issues, as well as monitoring donor and government commitments & accountability for nutrition.

Work on nutrition accountability within the SUN is consensual and collaborative, reflecting the SUN principles of mutual accountability. However, where the system is entirely stuck there may be a role for less collaborative approaches, especially if such actions are played by actors from outside the CSA. In India, significant increase in the public profile of nutrition was gained through **civil society action in the courts** and then through the **Right to Food campaign**. The Citizens' Alliance Against Malnutrition, comprising young parliamentarians across parties & other high profile and eminent citizens, then helped to take the profile of malnutrition in India to the next level through the publication of a report, **HUNGaMA** in 2012, and ongoing pressure for States to replicate the successful example of Maharastra and its State Nutrition Missions.

3.2 Promoting accountability of the private sector

The private sector is relevant at many levels to nutrition provision, including: delivery of food products which can support enhanced nutrition through added vitamins and nutrients or reductions in sugar, bad fats and salt; improving the access of people to nutrition-supporting products, such as rehydration salts or supplements; marketing practices that promote healthy options and do not encourage use of unhealthy products such as breast milk substitutes; fortification of agricultural products, and promotion of improved strains of more nutritious products (whilst ensuring that marketing and business techniques do not generate greater risks for farmers); mobile technology for data collection and for dissemination of nutrition messaging; or access to markets for small holder farmers; and so on.

The private sector can be held to account to rules and regulations established by Government - such as laws on maternity leave and breastfeeding within the formal workplace, or on breast milk substitute marketing (see Sri Lanka case study) – or to those elements on which it has made a formal commitment. As with Governments, pressure can be put to ensure these commitments are SMART and ambitious. Institutions involving the private sector can also set rules and principles that promote good nutrition actions: the membership application process of the **SUN Business Network**, for example, ensures companies that engage also respect various codes and rights. The private sector can also be held to account for the quality of its practices and reputation.

Box 3.8 Laws on Coorporate Social Responsibility (CSR) and nutrition

The Indian Government introduced 'The Companies Act' in September 2013 which includes a new provision on CSR. It stipulates that a company earning profits over a set amount must, in every financial year, allocate at least 2% of those profit towards CSR giving preference to the local area where the company operates. The act sets out 10 activities which may be included by companies in their CSR policy, the first of which is to support eradication of hunger and poverty.

(from SUN In Practice Brief: Effectively Engaging Multiple Stakeholders)

The **Global Nutrition Report 2015** (Table 8.3, on page 103) provides an interesting overview of the main approaches to accountability that are available to governments and civil society to influence company behaviours: legal (consumer watchdogs), quasi-regulatory (assessment of company commitments/ pledges/codes of conduct), political, market-based (invest/divest in company – or even campaigns to boycott products), public feedback (praise/criticism through the media); and private feedback. There is significant potential for CSAs involvement in directly or indirectly (through Government) supporting the accountability of the private sector. Potential innovations include the SUN Civil Society Alliance and Save the Children in Myanmar **piloting Kobo Collect**, a free and open-source mobile technology that has been applied to gather information from the public on violations of the Breastmilk Substitute Marketing Code. The SUN CSA will mobilise civil society to use the application to collect data on violations of the code. Meanwhile a Technical Working Group is being set up involving the Government's National Nutrition Centre and the Food & Drugs Administration, to oversee mechanisms to enforce the code, with quarterly reports analysing data generated by the public through the Kobo Collect application being fed to this working group for action.

Box 3.9 Ranking companies – driving change through reputation

The Access to Nutrition Index (ATNI) ranks the world's largest food and drink manufacturers with a scorecard on their nutrition-related commitments, practices and performance. The aim is to increase access to nutritious and affordable products (price, distribution, product formulation), and encourage responsible marketing, labelling and promotion of healthy diets. ATNI's benchmarking process stimulates dialogue on how each company can improve its contribution to nutrition.

The Global Index is being supplemented by 'Spotlight Indexes' that score and rate the largest food and drinks manufacturers in each Spotlight Country, such as these ones being developed in India, Mexico and South Africa.

Several companies have also made international and national level commitments on nutrition (within Nutrition for Growth or other fora). This provides an opportunity to hold them to account for what they say they are going to do, as the 2015 Global Nutrition Report does (noting that only 40% of companies' commitments were on course or had already been met). On the whole, experience suggests that "enforcement" approaches to accountability are necessary when working with this sector, rather than relying only on approaches based more around "answerability".

Dried Fruit Madagascar.
© Claire Blanchard for the SUN Civil Society Network.

3.3 Accountability of other actors

Mobilising resources for nutrition is important, not only through holding the government accountable for its own investments, but also through persuading international donors and international agencies to also focus their resources – both money, technical expertise, programme focus and their ability to influence government and the private sector– on to nutrition. Whilst many of the commitments entered by these agencies is at the international level, in Nutrition for Growth (**N4G**) and other mechanisms, you may look to engage with these agencies to agree national level commitments that arise from their international commitments. Additionally these organisations will often be active within the national SUN multi-stakeholder groups and be prepared to enter into commitments with and through those coalitions. Once a commitment is clearly made – you can then hold them to account to that commitment either through mutual accountability systems or using innovative approaches such as scorecards (see N4G scorecard case study), where this feels to be appropriate within the nature of your collaborative relationships.

Download the report at:
www.accesstonutrition.org/

3.4 Civil society's own accountability.

One of the best ways to have the legitimacy to hold others to account is to show that you are being fully accountable yourself, particularly to the populations who are suffering poor nutrition and are ultimately supposed to benefit from your work. CSA's own accountability should be towards such "beneficiaries" (forward accountability), within our own membership and to our peers (internal accountability), and to Government, donors and other powerful stakeholders (upward accountability). This is also a humbling process, as you learn that setting up your own accountability systems can be quite a challenging process (there will certainly be some resistance from staff and field workers – just as there is within government to citizen feedback mechanisms). However you will also see the benefits that these new accountability systems offer: closer relationship with people in communities and key stakeholder organisations, the ability to learn and improve how you work in light of that learning and, of course, increased legitimacy to hold others to account. Accountability systems ideally enable you to hear from your staff, beneficiaries and citizens, partners in coalitions, donors and also the target of many of your actions – the governments with whom you work. As you look to get feedback from them and provide information to them about your work, you are mirroring the behaviours you want from them. This is a very strong basis for a strong and equal partnership. Increased forward accountability also helps to consolidate local ownership, and mobilizes beneficiaries to act and speak for themselves, for example in nutrition advocacy and accountability work, especially at the community and district levels involving local officials.

Within the SUN Movement, the CSA can over time take on the role of encouragement to its CSO members to be more accountable to their members, and to one another. In Uganda, the multi-stakeholder platform plays an ombudsman role when possible or perceived conflicts exist within the civil society coalition (made up of civil society and media). Efforts to map CSO actions in nutrition (as in **Ghana**), and promoting alignment with national multi-stakeholder nutrition plans (as in **Kenya** or **Nigeria**) should be part of efforts to promote civil society accountability for nutrition. Where CSOs have made commitments under the Nutrition for Growth compact, they need to practice the same accountability towards these as they are demanding of Government and donors (and ensure their commitments are SMART). Some CSA members have already started to 'walk the talk' – for example, World Vision International made commitments of funding towards Every Woman Every Child (EWEC) and then commissioned a **review** of how it had delivered on its commitments both in terms of funds spent and also the extent to which these had been aligned with the EWEC commitment. The review concluded it was strongly on track.

Several guides exist on how a civil society organisation can strengthen its own accountability to marginalised populations, as well as its members and donors. These include actions to ensure transparency of information, participation of "beneficiaries" in decisions on programme activities and evaluation of progress, as well as channels for feedback and complaints. For example, Oxfam's **Accountability Starter Pack**, CIVICUS's **Accountability for Civil Society by Civil Society: A Guide to Self-Regulation Initiatives**, CARE Peru's **Guide to the organisation of NGO accountability to the community**, and some of SUN CSN's insights in **Enabling Good Governance in Society Alliances.**

4. Case Studies

Hundreds of children, adolescents and parents participated in the community meeting in East-Yangon before the election. The meeting was part of the campaign #VoteforChildren, arranged by Save the Children and UNICEF.

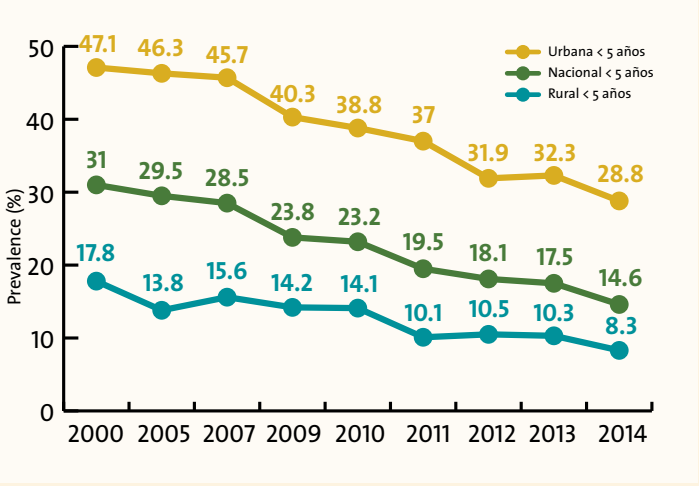
The campaign advocates for an increase the government budget share for education, health and social welfare from 9% to 15%.

© David Brændeland, Save the Children

Case Study 4.1 Peru: Working together for accountability for nutrition

Between 2007 and 2014, stunting in children under 5 in Peru nearly halved, from 28.5% to 14.6%. Yet rates in the previous ten years had hardly moved, particularly in rural areas where well over 40% of children were affected. This dramatic change occurred through a combination of civil society advocacy, political will that has been maintained across political cycles, alignment of Government, donor and NGO efforts within a national multi-sectoral strategy, and results-based budgeting. The Peru experience has been documented by IDS, UNICEF, the SUN, IFPRI, and for the SUN Learning routes project.

This case study explores an area that has received less attention to date: how stakeholders worked together to promote nutrition accountability, and ultimately nutrition results and impacts.



The two principal mechanisms used to promote accountability were the annual "balance" reports prepared by the Child Malnutrition Initiative (IDI[15]), and the Consensus-Based Monitoring, between Government and civil society, at national and subnational levels. The IDI is made up of national NGOs (Caritas, Future Generations, PRISMA), International NGOs (ACF, ADRA, CARE, Micronutrient Initiative, MSH, Plan, World Vision, Welthungerhilfe), UN Agencies (FAO, PAHO/WHO, UNFPA, UNICEF, WFP), Academia (the Nutrition Research Institute), donors (USAID – with the EU as observer), as well as a multi-sectoral body known as the Consensus- building forum for the fight against poverty (MCLCP[16]).

The IDI was set up in 2005 to influence national policy, starting by successfully getting all the main Presidential Candidates in the 2006 elections to sign up to the "5x5x5" commitment: to reduce chronic malnutrition in children under 5 by 5 percentage points over 5 years.

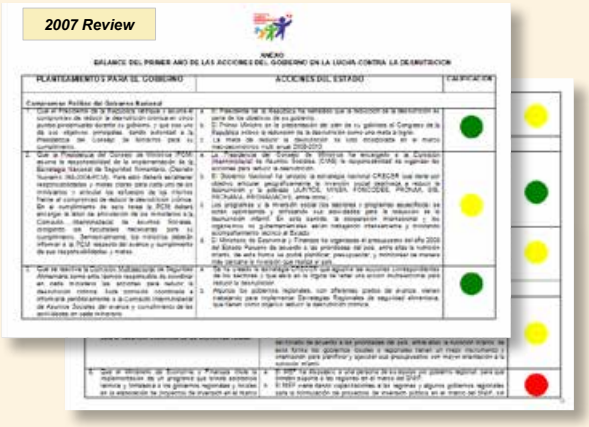
Once in power, President Alan Garcia increased the target to reducing stunting by 9 percentage points, and the IDI and others (such as the World Bank), provided significant support. The country developed an aligned multi-sectoral strategy (CRECER), a results-based budgeting program on nutrition with significantly increased funding, primarily from Government budgets as well as some donor support. Important programs, such as the JUNTOS cash-transfer program, were also reoriented to include nutrition-related results and conditionalities, such as the need to bring children to regular growth-monitoring. High level coordination was ensured through the Inter-ministerial Commission of Social Affairs, located in the Prime Minister's Office, which was able to convene and oversee the different sectoral Ministries that needed to work together. Donor-funded programs through civil society and the UN were also aligned in support of the CRECER strategy. Annual Demographic and Health Surveys were carried out, allowing politicians, officials and the IDI to track progress on impacts and results, while the Ministry of Finance provided up to date information on budgeting, allocations and expenditure, broken down by region[17] and budget-lines.

[15] Iniciativa contra la Desnutrición Infantil in Spanish - **http://www.iniciativacontradesnutricion.org.pe/**

[16] Mesa de Concertación de Lucha Contra la Pobreza in Spanish – see more **here**. The MCLCP is an existing space for multi-stakeholder coordination and collaboration, between Government, civil society and the private sector, established in 2001, out of a joint conviction that tackling problems of poverty and exclusion needed the shared participation of both the public and private sectors.

[17] The Region is the main subnational unit in Peru, with 24 regions, plus the Lima Metropolitan area.

Similar, pre-election efforts to gain commitments from candidates were carried out around the 2011 national elections, as part of a broader **campaign** on the rights of children. Around the regional elections in 2010 and 2014, campaigns focused on ensuring commitments to nutrition and other targets were included in regional "Governance Agreements". Despite a change of Government at the national level in 2011, the commitment to reduce malnutrition was retained and increased, with the new target set by President Ollanta Humala of reducing stunting from 23% to 10%, and anaemia in children from 50% to 20%. The new Ministry of Development and Social Inclusion (MIDIS) was created and given the responsibility of coordinating a revised strategy (emphasizing inclusion) and programs focused on nutrition. An additional funding program of incentives for local governments was set up to promote alignment of local government actions around health and nutrition, amongst other areas, with national plans and strategies. This enabled the regions with the highest needs to increase their funding for the results-based Articulated Nutrition Program by up to 50%, if they met targets against key indicators.



Annual reports to drive accountability and progress

Throughout this period, the IDI has provided both technical support, in developing national technical guidelines or strategies, and financial and technical support to implementation in specific regions. It has also played the role of "critical friend", through its annual reports on progress. These yearly "balance" reports (see example, to right) highlight successes and progress in tackling malnutrition – particularly the two national priorities of stunting and anaemia – as well as challenges that need addressing, with recommendations to address these. Drawing from both national policy and advocacy work, as well as the evidence and learning from IDI members' nutrition programs across the country, the IDI reports are presented to the Presidency, the Prime Minister's Office, and the key sectoral Ministries involved in nutrition programs. A brief communique is prepared and published in the national media, and follow-on meetings held with Ministry officials to discuss findings and recommendations.

The Management Committee of the IDI is made up of the Directors or Representatives of its members, who are able to convene meetings with Ministers or high-level government officials, while the Technical Committee, made up of nutrition technical staff in the IDI members, is responsible for the more regular engagement with government officials in the different Ministries. A Communications Committee, involving specialists from IDI members, ensures findings are summarized and communicated in the national and local media.

Consensus-based monitoring

Coordinated by the MCLCP, the consensus-based monitoring process brings together Government from different Ministries, civil society and others, to review the Government's Results-Based Budgeting programs, particularly the Maternal Newborn Program, and the Articulated Nutrition Program. Based on rights-based principles, the monitoring focuses on issues of efficacy and equity. Working at both national and subnational level, the mechanism also involves follow up to the regional Governance Agreements signed prior to regional elections (mentioned above), which include targets and commitments related to nutrition, amongst other areas. Regional level consensus-based monitoring spaces are also convened in some of the regions1[18], with the participation of regional Government bodies, and regional offices of IDI members, as well as regional civil society actors. These subnational spaces provide opportunities for broader levels of participation of representative actors, including social movements, representing women or smallholder farmers.

[18] The MCLCP has both a national structure, but also regional consensus-building forums (regional MCLCPs): in higher priority regions (with higher levels of malnutrition), IDI members and other actors have supported the set up of these regional consensus-based monitoring processes, usually presided over by the Regional Government body responsible for the Articulated Nutrition Program.

© MIDIS

The mechanism is built on trust amongst participants, based on shared commitments to the results that these programs aim to achieve, in terms of realisation of rights and implementing public policy. The fact that the MCLCP is widely respected by both Government and civil society enables it to play the convening role to bring both sides to the table, and facilitate discussions and agreements. National and regional reports are prepared together by participants from Government and civil society, with recommendations made only where there is agreement. The involvement of Government in these reports makes it more likely that recommendations will be implemented. Civil society actors, meanwhile, bring in valued evidence from local areas where they work and from the constituents they represent, and in turn increase their own understanding of the details and complexities of public policy and social programmes.

Reports highlight levels of budgeting, allocations and spending compared with differing levels of need (for example, spending by region per child under 5 in the Articulated Nutrition Program, compared with numbers or % of children who are stunted), noting where changes might be required. Where there are key activity lines with limited budgets, or allocated budgets with low levels of spending, these are highlighted, with recommendations of corrective actions that should be taken. Where there are issues of specific concern, shorter "alert" reports on specific regions or issues are issued, such as on anaemia in a particular region, or a fall in overall immunisation coverage levels. In 2014, for example, 14 national and 8 subnational reports and alerts were produced.

Monitoring Report on the Nutrition Budget Programme in the Ayacucho region, 2014

The main lessons from the Peru case include the need for:

- A multi-pronged approach, including awareness-raising to generate commitments beyond political cycles, technical support, alignment of actions (within and outside of Government), and different approaches to promote accountability.
- Seeing this as a long-term struggle, adapting plans and approaches as the political and institutional context changes. This has been critical to the success in Peru in keeping nutrition as a priority issue on the public agenda, across political cycles;
- Taking advantage of windows of opportunity, particularly around national or regional elections, but also around global processes (such as hosting a launch in Peru on The Lancet series on nutrition in 2013, or hosting SUN learning routes);
- Working at both national and subnational levels, particularly in the regions with highest levels of malnutrition, with actions at community, local government, regional government and national levels, as well as at the international level in the framework of the SUN;
- Regular and reliable data, on nutrition outcomes and service coverage[19], as well as on budgeting and expenditure, which has been essential for being able to make timely analysis and recommendations related to public programmes;
- Memorable communications to popularise through different channels, including meetings with public officials, catchy messages (5x5x5, or "10 recommendations for the Government's first 100 days"), and summary versions for the media;
- A unified voice, bringing together civil society, academia, UN agencies and donors in one coalition – the IDI – which has the influence and the credibility to dialogue and negotiate with, as well as support, national and regional Government. Agreeing and sticking to one clear position on issues within the IDI also provided clarity in discussions with Government;
- Aligning the work of IDI members with the national nutrition strategies – UN agencies, and a group of the civil society members, developed joint projects to support the Government strategy, based on a shared approach and understanding of the problem of nutrition, rather than competing programmes of work;
- Using the different capacities within the IDI members, sharing responsibilities for specific actions between members, rather than only within one central organisation. This in turn built commitment of the membership to see the value of the IDI to their own agendas;
- A combination of both technical and high-level engagement - Directors and representatives of IDI members were committed and involved, and used their influence for meeting with Prime Ministers, Ministers and Directors in the public sector, while IDI member technical staff worked with public officials on the details of policies, budgets and programs;
- Consensus-based mechanisms, which help bridge gaps of understanding between sectors – in order to reach agreements, civil society had to be able to understand the perspective of the public sector, and vice versa. This was critical for building trust, based around a shared commitment to see reductions in malnutrition.

Conclusion

These accountability mechanisms have been part of the collective efforts of Government and civil society that have kept nutrition as a national priority for 10 years now, across changes in Government. Significantly increased funding for nutrition programs, funded largely from domestic resources, have been complemented by aligned support from civil society, UN agencies and donors. Accountability efforts of the IDI and its members have played an important part in maintaining nutrition as a priority across political cycles, improving public programs and agreeing actions with Government to address issues of concern.

Together, these efforts have contributed to halving stunting in Peru in a decade, showing that significant change ***IS*** possible where all actors work together.

[19]Key indicators monitored included not only stunting and anaemia, but intermediate results such as exclusive breastfeeding, prevalence of acute diarrhoea and low birth weight, as well as immediate results such as children with adequate growth monitoring or complete vaccinations for their age, children and pregnant women with iron supplementation, and households with access to safe water.

Case Study 4.2 Zimbabwe: Engaging Parliamentarians for Accountability in Zimbabwe

THE POTENTIAL INFLUENCE OF MPS ON THE NUTRITION AGENDA

Members of Parliament have an important role to play in policy formulation, monitoring and implementation. As representatives of the people, parliamentarians can speak on behalf of their constituencies on the effects of policies, ensuring that development initiatives are informed by the real needs of people and are in line with national frameworks. They adopt and review legislation, approve budget allocations and exercise oversight over expenditures. However, when MPs are unaware of the nutrition-based commitments reached by their government[20], or lack up-to-date information on the specifics of the nutritional status of their constituents, then their ability to fulfil their function adequately in relation to nutrition is severely reduced. So how have MPs in Zimbabwe been playing their role in keeping the government on track with its nutrition commitments?

Getting the MPs up to speed with nutrition commitments

Until recently, Zimbabwean MPs had little awareness of the various commitments entered into by their government on nutrition, and only a general understanding of the serious impact of nutrition deficiencies upon their constituents. To address this gap, the Zimbabwe CSOs SUN Alliance (ZCSOSUNA) organised an event in May 2015, which was attended by 50 participants, including 27 MPs from the Nutrition and Agriculture Parliamentary Portfolio Committees.

The event started with an overview of the nutrition situation in Zimbabwe by province and district, given by the Nutrition Department in the Ministry of Health and Child Care (MoHCC). The high rates of stunting in certain districts clearly worried the MPs, with one declaring:

"Such evidence on high incidences of stunting in Mutasa district[21] for example can help us to influence budget allocations to districts with high levels of stunting and other related forms of malnutrition."

They complained that up until now they had lacked such evidence for their parliamentary debates. MPs were also visibly alarmed by the low breastfeeding rates in rural areas, attributed to religious practices and inadequate financial resources to the MoHCC from the national budget, leading to the immobility of village health workers in rural areas.

***Christopher Chitidi,** Chairperson of the Parliamentary Portfolio of Agriculture, suggests that diversifying crops is an important way to tackle malnutrition.*

***Hon. Ruth Labonde,** Chairperson of the Parliamentary Portfolio on health and child care, stresses the importance of scaling up action on nutrition. Photos: Christine Kasipo, Zimbabwe*

[20] As with other SUN movement countries, Zimbabwe has been putting in place national policies and frameworks to provide a practical direction to enable it to fulfil the global and institutional commitments that it has signed up to related to nutrition, including: the Scaling Up Nutrition Movement Framework (2011), the Nutrition for Growth **Compact** (2013), the African Union (AU) Maputo Declaration on Agriculture and Food Security (2003), and the AU Abuja Declaration on Government funding for health (2001).

[21] Where stunting in children under five affects over 40% of the population, according to the 2010 Zimbabwe **National Nutritional Survey**.

With the MPs now more motivated to take action, the second part of the event focused on informing MPs about the declarations and commitments on nutrition that Zimbabwe had signed up to and the genesis and focus of SUN Movement. To the surprise of the ZCSOSUNA, many legislators had not been previously aware of the SUN Movement or of the Nutrition for Growth commitments. Dr. Ruth Labode, the Chairperson of the Parliamentary Committee on Health and Child Care, declared:

"...to our surprise we are hearing for the first time today in May of 2015 that Zimbabwe joined the SUN movement in 2011. That is years down the line. We feel such a noble idea should have been communicated with us much earlier for us to lobby for legislation promoting scaling up of nutrition".

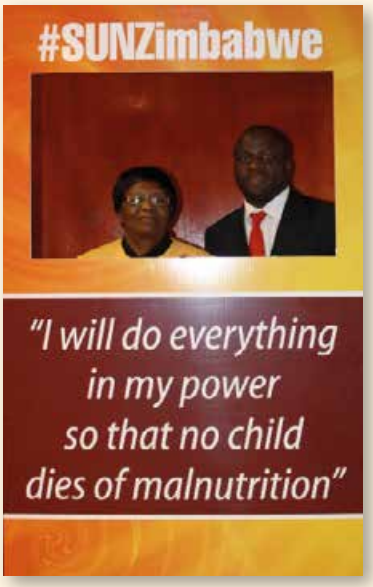
A solid foundation on which to move forward

The level of discussion during the meeting was excellent, with MPs being very objective in discussions and not saying things from their political affiliations. To keep nutrition high up the agendas of MPs into the medium and longer-term, a nutrition champion was appointed from amongst the MPs, Hon. Tholakele Khumalo. The meeting confirmed to ZCSOSUNA just how vital civil society is for providing relevant and evidence-based facts to Parliamentarians. They know they have a really important role in creating awareness of different policy frameworks that MPs can use to track and monitor progress in promoting nutrition.

The objective of the event was for MPs to go on to advocate for progress on the various international commitments - and where these were not being realised to demand that investigations or commission of inquiry be set up. Early indications from the Nutrition Champion, backed up by an analysis of the Zimbabwean Hansard (which tracks the contributions, motions and issues raised by MPs) reveals that food and nutrition issues are now being debated more in Parliament.

The Nutrition Champion has also recommended that more awareness campaigns are needed to maintain the momentum and catalyse wider interest; she is proposing that this should be arranged in Parliament with the presence of ***ALL*** MPs. In the meantime, Hon. Khumalo has taken up her role by launching the key advocacy messages of ZCSOSUNA during the Global Day of Action on nutrition held on 19 June 2015[23], and in attending meetings of the Food and Nutrition Strategic Advisory Group, which includes government officials, UN agencies and NGOs.

Similar groupings of Parliamentarians are being set up in other countries. For example, on 8 September 2015, the **Ghana Parliamentary Caucus against Hunger and Malnutrition** - a voluntary group of parliamentarians from both majority and minority groups – met with civil society, including World Vision and the Hunger Alliance Ghana (HAG), to discuss Ghana's food security and nutrition situation and to identify new ideas and bottlenecks in the adoption of a national nutrition policy. At the event the Nutrition Department of the Ghana Health Service identified anaemia as one of the biggest nutritional disorders in Ghana affecting about 66 per cent of children. The Hunger Alliance Ghana (HAG) told the Ghana News Agency that the parliamentarian involvement was a vital ingredient in getting the necessary bold political commitment to fight hunger and malnutrition in Ghana.



Hon. Tholakele D. Khumalo, MP, with Chris Mweembe, National Coordinator for ZCSOSUNA, make their nutrition commitments at the 2015 Global Day of Action. Photo: Diverson Zuze.

[22] **http://www.zimsentinel.com/?p=1570**

[23] **https://www.youtube.com/watch?v=-rHPbGOgd4I** and **http://www.zcsosuna.org/2015/07/27/zimbabwes-global-day-of-action-urges-collective-action/**

Box 4.2.1 Lessons on how to engage with parliamentarians in the Zimbabwean context:

Reflecting on this process, seven main lessons have been identified on how to work effectively with MPs in this context:

1. ***Build a strong partnership with government:*** ZCSOSUNA first developed a concept note outlining how they planned to engage with parliamentarians and shared this with the Food and Nutrition Council (the Government SUN Focal point), the Nutrition Department in the MoHCC, the Clerk of Parliament and the two secretaries of the parliamentary portfolio committees on health and agriculture. This meant that key Government and parliamentary officials were involved in the earliest stages of planning for this activity with MPs, and helped to make sure that they felt strong ownership of the process and commitment towards it. Their support was secured through several planning meetings with the Deputy Director of Nutrition Services in the MoHCC, who subsequently delegated senior technical officials to present and respond to questions from MPs during the event.
2. ***Observation of government procedures in engaging MPs is paramount:*** In this instance to secure the participation of the secretaries, an official invitation letter was submitted by the ZCSOSUNA secretariat to the Clerk of Parliament who then assigned the secretaries to work with them. ZCSOSUNA secretariat then followed all the right protocols proposed by the secretaries of the two government committees. The secretaries in turn played an important role in motivating MPs to attend the event.
3. ***Timing is critical:*** ZCSOSUNA chose a week when Parliament was holding its sessions. This meant that most members of both committees would already be in Harare. This also kept costs down since transport and accommodation allowances for MPs were not required; costs were covered by Parliament since they were on Parliamentary business.
4. ***Getting commitments to action in writing:*** where possible, ask parliamentarians to sign a position with clear time frames on what they commit themselves to address.
5. ***Using such events to engage wider networks:*** inviting other stakeholders, such as the UN, donor community and business, can help increase pressure for action by MPs.
6. ***Engaging the press:*** A press conference for media houses - state and private ones, both electronic and print – increases awareness of the initiative, and so can further encourage MPs to take action. The statement from the event was published in the daily newspaper on 12th of May 2015. In addition, the media produced related stories on food security and nutrition which were widely reported on national TV, radio stations and print media.
7. ***Strengthening the engagement of civil society coalition members:*** Prior to the event, the ZCSOSUNA secretariat had drafted a statement with policy recommendations on nine accountability issues[24]. They actively sought input from ZCSOSUNA Members to strengthen this statement, which in turn helped to build the broader alliance's ownership to the process. At the event, alliance members were present and actively involved; for example, Regis Matimati, the Africa AHEAD Country Director and ZCSOSUNA Vice Chairperson, moderated some of the discussions, and this wider coalition involvement helped to add legitimacy to the event.

[24]The policy recommendations included: progress on Nutrition for Growth commitments; increase resource allocation - adhering to the AU Abuja Declaration (at least 15% on Health) and the AU Maputo Declaration (at least 10% on Agriculture); and the need to review outdated policies through a nutrition lens.

Distribution of corn soya blend to mothers at Chingwizi camp, Zimbabwe © Save the Children

Case Study 4.3 Budget Analysis and Advocacy for Increased Investment in Nutrition and Accountability in Malawi

THE ACCOUNTABILITY INITIATIVE

Although there have been improvements in maternal and child malnutrition in Malawi, under-nutrition remains high with 47% of children stunted, 14% underweight and 4.1% wasted, with a strong resultant impact on Malawi. Based on published Budget Estimates, Civil Society Organisation Nutrition Alliance (CSONA), a local CSO coalition founded as part of the Scaling-Up Nutrition (SUN) movement, has been carrying out annual budget analysis exercises. Their budget analysis focuses on six Ministries – Agriculture, Department of Nutrition, HIV&AIDS (DNHA), Education, Health, Local government, and Gender. The aim is to continuously generate evidence that informs CSONA's advocacy work, as well as develop recommendations to Government and Members of Parliament (MPs) on gaps that exist in the implementation of policies, as well as on the delivery of the Nutrition for Growth (N4G) commitments. These included that:

- **Proportion of total annual government expenditure allocated to nutrition will rise from 01% to 0.3% by 2020**
- **Nutrition will be mainstreamed in sectorial budgets which have a role in fighting malnutrition (education, health, agriculture and gender)**
- **Malawi will increase accountability by rolling out the nutrition financial tracking tools and the national monitoring and evaluation framework by 2014**
- **Malawi will develop a Nutrition Act by 2016 & review the NNP&S by 2013**

To track Malawi's N4G commitments, and to highlight some of the challenges arising due to the restructuring process (see box 4.3.1, below), CSONA and Save the Children embarked on a Budget Analysis to track nutrition investments, at the both national and district levels. Figure 4.3.1 below shows the timetable and process for this budget analysis.

To date there has been significant progress: the NNP&S has been updated; the Nutrition Act has been drafted and is currently going through a consensus review; a national M&E framework with clearly defined indicators is in place and has been rolled out in 70% of the districts; and a web-based financial tracking tool has been designed. However, it is yet to be disseminated and rolled out at all levels.

However there has been little progress towards increasing the financial commitment towards the 0.3% target by 2020. In fact, CSONA's budget analysis showed that the 2016 budget for nutrition was around US$370,000 below the 0.1% commitment, a shortfall of 23%. Meeting the N4G commitment of allocating 0.3% will mean nearly quadrupling the national nutrition budget, from US$1.28m in 2015, to US$4.95m.

Hon John Chikalimba – Chair of Parliamentary © CSONA

Box 4.3.1: The impact of restructuring the governance arrangements for nutrition

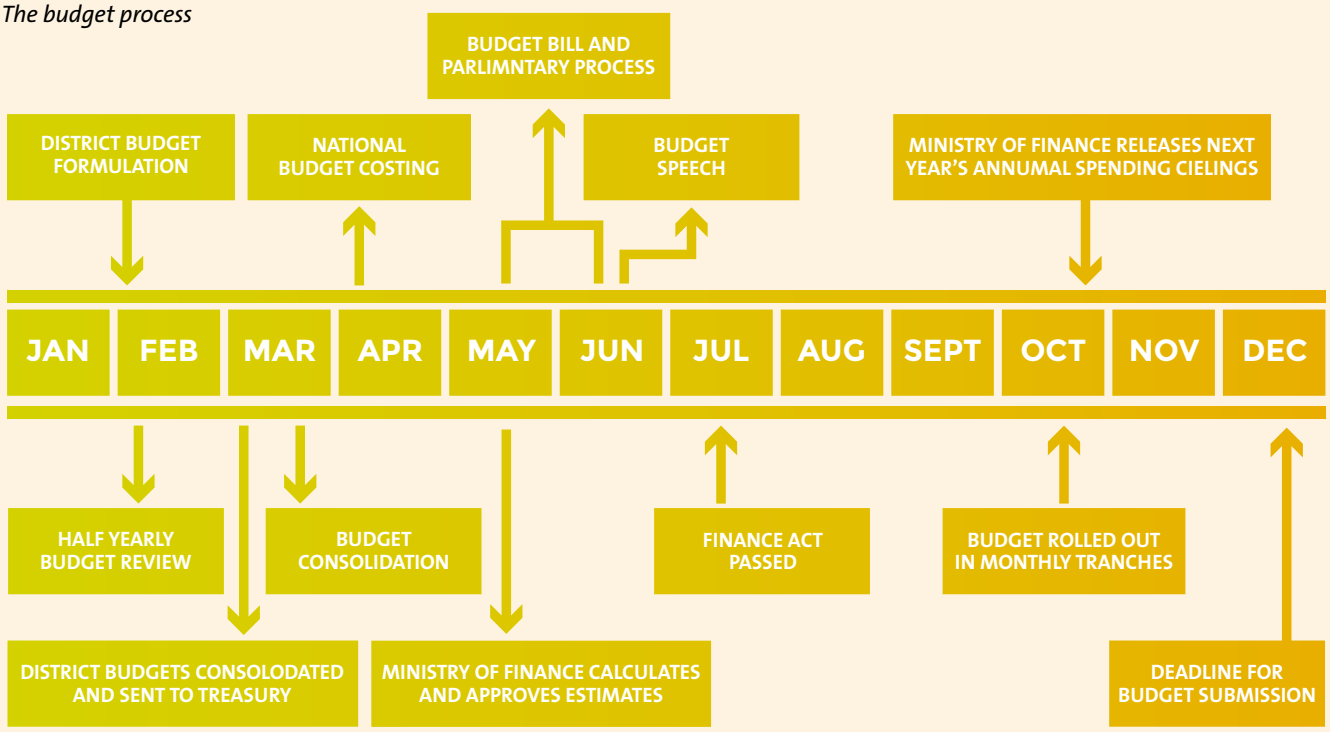
Malawi has shown strong leadership in nutrition by being an early riser country to launch the SUN Movement in 2011 and making bold financial and policy commitments at the Nutrition for Growth (N4G) summit in June 2013. The importance of nutrition was fully recognised in Malawi 2005, when the Department of Nutrition, HIV&AIDS (DNHA) was moved from the Ministry of Health (MoH) to the Office of the President & Cabinet (OPC), with the Permanent Secretary of DNHA reporting directly to the President. This greatly increased the oversight and coordinating functions of DNHA across the sectoral ministries. However, in 2014 Malawi underwent a change in government leadership, following the general election. A restructuring process of the OPC placed DNHA back to the MoH, a move regarded as a retrogressive step by many international and civil society organisations, which risks compromising the progress made in nutrition governance.

Additionally, Malawi has a National Nutrition Policy & Strategy (NNP&S) which is aligned with the country's development agenda, global agendas and commitments, and which clearly defines the nutrition-related roles and responsibilities as well as mandates that Ministries are to deliver upon. However, the NNP&S has yet to be formally approved by Cabinet, and the drafted Nutrition Bill awaits enactment by Parliament. In the interim, the NNP&P is being followed in the absence of a legislative framework.

With the move of DNHA back to MoH, the approval process of the NNP&S and the Nutrition Bill has stalled. Coordination of the Multi-Sectoral Platforms (MSP) and the mandate to hold Ministries to account has also been somewhat compromised. For instance, after the announcement of the move from OPC to MoH in July 2014, the functional oversight mandates of DNHA were unclear. During this transition period, DNHA did not have a Principal Secretary, could not deploy nutrition staff to sectoral Ministries or districts, and could not push the NNP&S for approval. In addition, DNHA was unable to convene a MSP meeting for a period of approximately 10 months, as opposed to biannually as was occurring previously.

Implementation – what took place?

The budget process

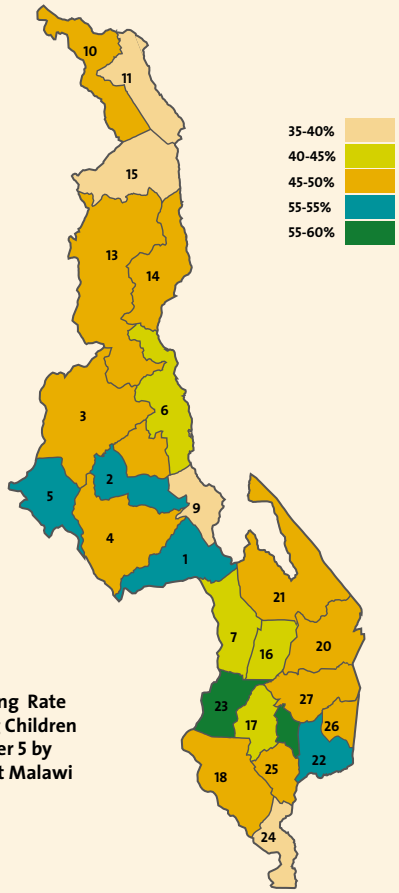


Budget Estimates are published at the same time as the Budget Speech is read in May; this is a key moment to access and begin analysing the current year's spending in comparison with the previous financial year's spending. Budget estimates are made available by the Ministry of Finance to the public, through hard copies and through website summary documents. CSONA then starts its data entry process, where budget lines for nutrition-relevant sectors are entered into a database. This is coupled with consultations with the DNHA and sectorial ministries or budget holders to seek clarifications and justifications for the "start", "termination", "continuation", "increase" or the "reduction" in specific budget lines. Having gathered this information, the data is then analysed and plotted on graphs to establish trends in the data, helping to flag up how the budget is, or is not, mirroring the commitments in the NNP&S and the N4G. Technical expertise was provided, mainly by Save the Children, to ensure that the analysis was accurate and could be summarized clearly for the intended audiences.

Actors/stakeholders involved in the process

Led by CSONA and supported by its members and partners, the results of the budget analysis were disseminated first through an Engagement Meeting for MPs and CSOs, and then a Nutrition Champion-Building Workshop with the same group. To ensure Government was on board with this process, the government focal point (i.e. DNHA) was consulted on specific issues and invited to the 2nd workshop as an observer. The Donor Network Chair (WFP) was also kept informed on the engagement meetings. To gain access to the MPs, CSONA developed a close relationship with the Parliamentary Clerks.

The Engagement Meeting was attended by MPs from the Parliamentary Committees on Nutrition HIV&AIDS, Agriculture, Budget & Finance, and Social Welfare, as well as the media. CSONA made presentations on stunting levels in Malawi, showing convincing data generated through the district scorecards which helped to contextualize stunting levels, and generate interest amongst the MPs as constituency representatives (see scorecard below).



Stunting Rate Among Children under 5 by District Malawi

Throughout Malawi, more than 1 in every 3 children is stunted. In the hardest hit areas, that number is more than 1 in every 2.

This is an emergency for our communities.

DISTRICT	UNDER 5 STUNTING %	TOTAL POPULATION	DISTRICT	UNDER 5 STUNTING %	TOTAL POPULATION
1. Dedza	51.1	623,789	14. Rumphi	38.5	169,112
2. Dowa	51.6	556,678	15. Balaka	44.8	316,748
3. Kasungu	47.2	616,085	16. Blantyre	41.6	316,748
4. Lilongwe	45.5	1,897,167	17. Chikwawa	49	438,895
5. Mchinji	53.7	456,558	18. Chirazulu	56.6	290,946
6. Nkhotakota	42.9	301,868	19. Machinga	48.4	488,996
7. Ntcheu	42.4	474,464	20. Mangochi	48.3	803,602
8. Ntchisi	46.8	224,098	21. Mulanje	52.2	525,429
9. Salima	39.6	340,327	22. Mwanza	56.4	94,476
10. Chitipa	466	340,327	23. Nsanje	38.6	238,089
11. Karonga	37.9	272,789	24. Thyolo	49.8	587,455
12. Mzimba	47.7	853,305	25. Phalombe	49.3	313,227
13. Nkhata Bay & Likoma	48.3	224,224	26. Zomba	47.8	670,533

CSONA then shared the budget analysis results, highlighting the trends in nutrition budget allocations, and how this compared with the N4G commitments and recommendations. The presentations incorporated and data from the 2010 Malawi Demographic Health Survey, the Global Nutrition Report, the Cost of Hunger in Malawi, and preliminary results from 2014 Multiple Indicator Cluster Survey (MICS). CSONA specifically asked the MPs to:

- Engage with district councils as implementers of the country's agenda, to prioritise nutrition and allocate resources to nutrition as a priority development area. MPs should further hold their district councils and sectors accountable in line with their mandate by tracking allocations, funding and expenditure for nutrition in sectors and councils;
- Lobby government to honour its commitment to increase investment in nutrition;
- Raise awareness of the issues of nutrition within their constituencies, districts and nationwide; and
- Use their sphere of influence and contacts to advocate for nutrition.

Finally, the MPs themselves explored ways in which they could use their influence during the parliamentary process to decide on policy choices and priorities that would consequently inform the National Budget, and oversee its implementation in their constituencies. As members of the District Assembly, MPs highlighted how they could be present in District Council meetings and lobby for allocations to nutrition in the District Development Fund.

The second engagement meeting – the Nutrition Champion-building session - focussed on the engagement mechanisms of MPs and CSOs at the district level, with support from the Graça Machel Trust (GMT) in collaboration with RESULTS Educational fund. To underpin their commitment, MPs signed pledges to commit themselves as Champions of Nutrition, to elevate nutrition issues at all levels and continue advocating for increased nutrition budget allocation.

The collaboration with MPs is intended to develop and deepen over time, with the CSONA-MP interaction becoming a regular feature in the Malawian political calendar. As the process is institutionalised, a social auditing or monitoring process can be developed by CSONA and its members at the district level, so that ordinary Malawian citizens can then engage in monitoring the budget process, the budget outputs and, in particular, the impact of government spending. The most cost-effective means for measuring impact is for the community to measure and assess it themselves, according to their own pre-determined criteria, supplemented by other measurement assessments. These accountability tools will also track the timeliness and amount of actual expenditure from the national level to the district level.

Whilst the district level accountability work has its own merit for improving results at that level, using these district level social audits to leverage the interest of the constituent's MPs will enable a vertical link to the national level, generating examples and a motive for MPs to lobby for greater nutritional impact and spending in their political and development circles.

Figure 1: Honourable MP and Chair of Parliamentary Comittee on Health and Nutrition Deus Gumba Banda leading fellow members in signing a nutrition champion pledge card. © CSONA

Achievements and results

- The meetings with MPs have opened a window of opportunity to make nutrition once more a political and development priority. Following the engagement meetings, CSONA was featured in two national radio programs, three times on the national TV station during headline news, and four times in electronic media[25].
- A monitoring tool - that tracks meetings, media, quotes, immediate outcomes and results - has been developed to ensure that advocacy efforts are followed through.
- Signed Nutrition Champion Pledge cards by MPs shows concrete next steps and a significant commitment.
- The Parliamentary Committee on Nutrition have organized a Fact-finding Mission on Nutrition Resource Allocation later in 2015, and CSONA, in liaison with the Parliamentary Clerk, is coordinating with district level CSOs to engage with MPs during the mission.
- Recognizing that malnutrition is crippling the Malawian economy, the Chairman of the Parliamentary Committee on Budget & Finance extended an invitation to CSONA to present at its next meeting – another opportunity to advance nutrition.
- The presence of Mrs Graça Machel at the Engagement Meeting helped to raise CSONA's credibility and its ability to influence.

Lessons learnt

- Budget analysis has proven to be a useful means of engaging MPs, donors, members of civil society as well as the Government, in particular the government focal point for nutrition at the DNHA.
- Hard data from the budget is a convincing means of demonstrating the Government's level of commitment to nutrition, especially when scored at a district level and compared with other budget lines. To be able to see the trend, this exercise needs to be a standard activity that is undertaken every year.
- Budget analysis needs to extend to the sub-national level as soon as possible, to track planned and actual expenditure at the district level, including the timeliness in the receipt of funding. By tracking these two criteria, CSONA will gain a better picture of the district operational viability, in terms of delivery of goods (e.g. nutrition commodities and medicines) and services. This can be aligned with the Nutrition Financial Tracking Tools and the National Monitoring and Evaluation framework that has been drafted by the DNHA.
- There is a need for capacity building skills and tools to help district level CSOs and MPs to analyse budgets and track expenditure.
- All these efforts depend on the passing of the Access to Information Bill, which will unlock civil society access to information. CSONA is influencing those CSOs that are in an advocacy partnership working on Access to Information to have this bill passed swiftly.
- All audiences, including Parliamentarians, reacted positively to a chart of Malawi's progress against its N4G pledges compared against other countries in the Southern Africa region. Such cross-country comparison tools can be effective for pressuring national governments to step up their efforts, or to show disproportionate response in a region.

[25] http://www.manaonline.gov.mw/index.php/national/health/item/2917-malawi-govt-pledges-continued-support-towards-nutritional-activities; http://www.apanews.net,/; http://www.starafrica.com/; http://www.allafrica.com

A mother with her child in the Ntchisi District of Malawi © Oli Cohen, Save the Children

Case Study 4.4 The Art & Science of Budget Analysis in Zambia

Nutrition is a serious public health concern in Zambia[26], however until recently it has not had a high profile among policy makers. Then, in late 2010, Zambia repositioned itself in the fight against malnutrition by signing up to the SUN Movement and developed the National Food and Nutrition Strategic Plan (NFNSP 2011-2015). This included the First 1000 Most Critical Days programme, aimed at reducing malnutrition with special attention to the first 1000 days of life, starting from conception until the second birthday.

In mid-2011 a consortium[27] came together to discuss the urgent need to encourage leadership and accountability on nutrition in the country, and so it was decided to set up the CSO-SUN alliance, to advocate for improved nutrition. The Alliance would seek to influence policy & legal reforms, while also creating public awareness and demand to hold duty bearers to account.

Although Zambia had signed up to a number of regional commitments that should be reflected in the national budget (the AU Maputo Declaration on Agriculture and Abuja Declaration on Health), the observation of CSOs is that such commitments are not always met by governments unless there is pressure from civil society to do so. When Zambia made **commitments** at the Nutrition for Growth Summit in June 2013, including that it would increase its public funding for nutrition by at least 20% year on year for 10 years, this provided added motivation for this civil society budget analysis. This would enable society to monitor how much prioritisation (and hence funding) the government was putting into nutrition.

Zambia's CSO-SUN Secretariat has now been conducting budget analysis for a period of three years (2012-2015) to highlight the state of nutrition funding in Zambia, and to advocate for positive changes in financing of nutrition interventions. The process involves two major phases:

Pre-budget analysis: civil society works together to lobby sectoral Ministries[28] to prioritise nutrition funding during the planning phase, when the Medium-Term Expenditure Framework (MTEF) is released mid-year in accordance with national plans and commitments.

Post-budget analysis: detailed analysis is carried out of the country's Estimates of Revenue and Expenditure document, known as the "Yellow Book", to ascertain allocations made to each sector and the main budget lines they manage.

Over the years, CSO-SUN's budget analysis has become a credible source of nutrition budgeting data in Zambia, amongst donors, government, parliament and civil society actors alike. Once the evidence is generated, CSO-SUN uses it to focus and advocate for the appropriate reforms and interventions targeted at the duty bearers who are responsible for nutrition improvements. The areas highlighted are: tax measures that focus on the need to increase revenue collection, particularly on the foods that are linked to non-communicable diseases; and increased allocations of nutrition-specific and nutrition- sensitive activities identified in the budget.

[26]The 2013-2014 Demographic Health Survey report highlights that 40% of children under five are stunted, 28% are underweight and 5% are wasted. There is also a growing trend of obesity and over-nutrition, which currently stands at 23% in women alone.

[27]Of international NGOs, faith-based groups, local NGO's, government and research institutions.

[28]Including the Ministries of Health, Community Development, Agriculture, Education, Gender, and Local Government & Housing.

The process of budget analysis

To strengthen capacities of the CSO-SUN, Save the Children UK supported a training in budget analysis in 2014. CSO-SUN then undertook an in-depth analysis of 6 line ministries' budgets[29] and this formed the foundations for advocacy efforts on three levels:

First, **engaging policy makers in 6 key Ministries,** (Agriculture, Education, Health, Gender and Women's affairs, Community Development Mother and Child Health, and Local Government): the Alliance wrote letters to each of the Permanent Secretaries of the Ministries at the start of the budget formulation period[30]. The letters applauded the progress made by the Ministry concerning nutrition in the previous financial year, and also suggested some specific actionable and attainable activities for the forthcoming financial year, such as:

- The formation of a nutrition working group [which was agreed upon by the Permanent Secretary of Agriculture following CSO-SUN advocacy and engagement with the Ministry] and
- That all key line ministries include a nutrition budget [which led to the Secretary to the Cabinet asking for this to be implemented during the high level Steering Committee of Permanent Secretaries meeting in 2014].

A submission was also brought through a letter to the attention of the Minister of Finance, who charged specific key line Ministries to take the lead on budget planning. The Alliance also engaged civil society networks working on wider issues of budget reform, such as the Zambia Tax Platform. Through collective efforts, stakeholders lobbied for increased and sustainable budget allocations for nutrition and other social priorities, across all sectors.

Secondly, **the legislature was used as a platform of engagement:** CSO-SUN advocated to the Clerk of the National Assembly, and through this person's intercession was able to present before the Expanded Committee on National Estimates[31] , making the case for increased spending on nutrition in the national budget. The Members of Parliament vote on approving the budget laid before them by the Minister of Finance, and have the right to question sectoral Ministers and their senior staff (Permanent Secretary and Directors) on the budget, as well as on sectoral polices and plans. It is at the committee stage of any legislation, particularly of the annual finance bill - usually after the 3rd Reading - that it is possible to question the budget. However, the likelihood of significant change at this stage is remote. MPs continue to reference CSO-SUN's budget analysis and submissions on the floor of parliament during debates.

Lastly, **advocacy and media campaigns were engaged:** For example, the Director of CSO-SUN participated on a panel to discuss nutrition-related issues on various radio and TV programmes, has published various ad-hoc articles, and produces a weekly column on nutrition in the Daily Mail, one of the main national newspapers. A key partner in the efforts has been the media, and CSO-SUN has provided substantial training to the media on how to report evidence-based and sound nutrition news.

The key tool used throughout these advocacy efforts by CSO-SUN has been the budget analysis reports outlining the budget allocations for nutrition in 2013, 2014 and 2015. Analysis of nutrition spending by the World Bank and NFNC has also contributed to this, highlighting the very low levels of current spending, and arguing for significant increases, in order to meet the estimated additional US$30 per child under five required to scale up high impact nutrition interventions as calculated by World Bank. The evidence-based approach has also created opportunities for CSO-SUN to embed itself in institutional bodies at sub-national levels. For example, in the districts of Samfya and Lundazi, members of the Alliance have participated in the District Nutrition Development Committee, highlighting the need for increased nutrition funding at the district level.

CSO-SUN is simultaneously using both a bottom-up approach, by advocating the importance of nutrition through sub-national level structures, while also engaging with key line Ministries at national levels. This is further complemented by engaging with stakeholders who are part of the accountability bodies for the national budget, through the District Development Coordinating Committees and the Provincial Development Coordinating Committees.

[29] **How to do a Nutrition Budget Analysis for timely Advocacy towards increased investments in Nutrition - A tool for SUN country Civil Society Alliances**

[30] There is a 3 week window, where civil servants from all Ministries formulate their budgets, within the expenditure ceilings given to them by the Ministry of Finance for the next financial year.

[31] A parliamentary committee charged with the responsibility to act upon issues raised by stakeholders on allocations in the national budget.

What barriers or challenges were met and how were they overcome?

The structure of line Ministries do not have in-built support systems that influence the allocation to nutrition. Typically, one or two strong individual champions within each Ministry makes the case for nutrition. Through continued engagement with the Ministries, through letters and meetings with high level officials, some Ministries are committing to restructuring and to giving greater prominence to nutrition.

Another challenge is that it is difficult to identify what constitutes nutrition spending. For example, how much of the government's main agriculture programs - an input support program and the Food Reserve Agency, both largely focused on maize production and with limited participation of the poorest farmers – should count as "nutrition-sensitive" spending? These issues have been resolved by collective consensus by key sectors, policy makers, parliamentarians and other key stakeholders.

Progress to date

The most notable achievements have been the Directive by the Secretary to the Cabinet to key line Ministries mandating budget lines on the national budget be allocated to nutrition. Unfortunately, this directive has not yet been fully adhered to by all Ministries and additional resources allocated to nutrition have been sparse, with nutrition budget allocations increased by 2.5%, rather than the 20% annual increase that Zambia committed to at the Nutrition for Growth summit.

However, there has been a growing recognition by line ministries to embed nutrition in programming, and some line Ministry policies (such as Agriculture, and Social Protection) now have a stronger nutrition component. This highlights the importance of CSO-SUN's approach to engage through the multi-stakeholder platforms and approach the issue of nutrition from more than one accountability and advocacy channel.

Additional achievements include:

- CSO-SUN provided input into draft National Agriculture Policy and draft Social Protection Policy, to scale up their responsiveness to the nutrition needs of the country. Recommendations have since been integrated into the draft policies by the Ministry of Agriculture and Ministry of Community Development;
- Appearing as witnesses before several parliamentary committees to contribute to national discussion on the state of nutrition in Zambia;
- Supporting Nutrition legislation in Parliament by assisting the formation of the All Party Parliamentary Caucus on Food and Nutrition (APPCON), who are a fixed group of influential Parliamentarians who are members of the group that lobby on nutrition issues and raise concerns behalf of CSO-SUN;
- Contributing to the nutrition narrative in Zambia through structured and consistent mass media publications on nutrition issues.

What we learnt:

For CSO-SUN:

- Starting off with a strong focus on effective member engagement, specifically with non-traditional partners, helps build a strong foundation. It is also important to consider and activate membership involvement in the various institutional roles of the SUN movement, and to heighten understanding of the CSO-SUN and its niche;
- The importance of collectively agreeing with Government and civil society on what counts as nutrition- sensitive and what constitutes nutrition-specific interventions, when conducting budget tracking.

For government and legislature:

- Involvement with MPs has a high impact on the national prominence of nutrition advocacy;
- Involvement of government in budget analysis is critical. Asking them to validate the findings adds to the credibility of civil society recommendations, making them more effective as an advocacy tool;
- While political attention has been achieved, further efforts to encourage political-system commitments at all levels are crucial to the SUN movement.

Global Day of Action 2014 © Zambia Civil Society Organisation Scaling Up Nutrition (CSO-SUN) Alliance.

For strategy:

- CSO SUN needs to make a deliberate effort to encourage and facilitate more programmatic integration amongst nutrition players, at both the national and district level;
- It is important for the budget analysis process to become a standardised operating procedure with CSO members, to ensure progress is tracked, to show the impact of such accountability efforts in increased budgets;
- The budget analysis process needs to be expanded into budget tracking, reviewing levels of spending as well as budgeting;
- Media involvement is key to deliver information beyond the circles of those directly working on nutrition.

What advice would we offer to others thinking of applying a similar approach?

- Deep involvement of stakeholders, including the government, MPs and the media;
- Direct engagement of responsible officials;
- Begin analysis process from the planning stage, to ensure nutrition allocations;
- Work to ensure nutrition is included in long-term development plans and sectoral policies (see box 4.4.1), to set the longer-term framework for nutrition to be prioritized later in budgets.

Box 4.4.1 Sustaining nutrition beyond political cycles

CSO-SUN noted there had been little progress in establishing a robust long-term results framework in Zambia, which would then drive medium term financial resource allocations and resource deployment systems. To address this, CSO-SUN decided to engage in the process of the development of Zambia's 7th National Development Plan (2016-2020). It is doing this in partnership with government and other civil society organisations - such as the Civil Society for Poverty Reduction (CSPR) – to build consensus that nutrition should be a central theme within the plan. Having the mandate for planning and budgeting, the Ministry of Finance has a powerful opportunity to draw attention upon nutrition and provide solutions to areas of diminished engagement. Therefore the positive reception by Ministry of Finance, through inclusion of nutrition in planning cycles for the 7th National Development Plan, is a great stride forward. Such inclusion should also be a sound foundation for nutrition to stay a priority beyond political cycles.

Additionally, the CSO-SUN works to develop relationships and space with technocrat policy makers (civil servants) who tend to have a longer lifespan than politicians in the government institutions. Finally, the following four pillars, in a complementary fashion, also form the foundation to help sustain nutrition results into the medium term, as it will prove difficult to gain traction on nutrition through one-off initiatives, or working in silos:

- **An active Civil Society with budget analysis skills;**
- **Partnerships with key networks in the country, including donors and government, but also civil society networks working on tax, budgeting and development policy;**
- **The active involvement of parliamentarians – who are identified as champions of nutrition; and**
- **A media, which has been trained and committed to delivering accurate nutrition-sound news.**

Case Study 4.5 Tanzania: Tracking Nutrition Funds at Local Level

THE CONTEXT

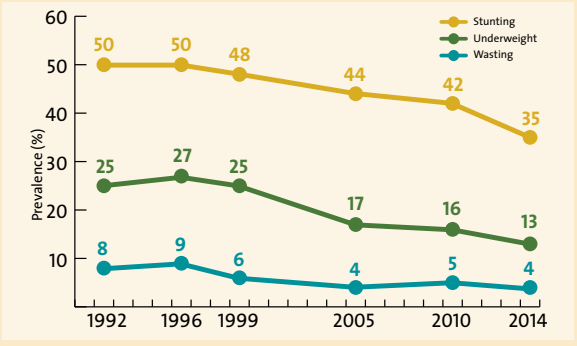
The United Republic of Tanzania is administratively divided into 31 regions, with local government divided into urban and rural council authorities, both on the mainland and Zanzibar. With the coming of the SUN Movement in 2010, political commitment was galvanised for tackling malnutrition, particularly at the highest levels of government, and several actions have been taken:

- The establishment of the *High Level Steering Committee on Nutrition*, to push the nutrition agenda towards achieving Zero Malnutrition in the country[32];
- The establishment of *District Nutrition Steering Committees*, a multi-stakeholder forum at district level, established to provide space for dialogue among the SUN stakeholders to make sure that nutrition gets adequate attention and actions related to it at the district leve[33];
- A designated budget line for nutrition activities has been established in the national budget.
- Increased resources have been committed by donors for civil society organisations, although the focus of this support has been limited to certain parts of the country;
- The government conducted a *Public Expenditure Review (PER)* in 2014 for Nutrition, for the purpose of establishing allocation and operational efficiency, and ensuring fiscal discipline on nutritional funds. The **PER** was undertaken of the nutritional line ministries, as well as a sample of 15 Districts, which were randomly selected from the 169 across the country. One critical finding in the PER was that there was very little prioritisation of nutrition activities in the country, especially at council level. The PER showed that national spending on nutrition is as low as 0.22% of the entire National Budget, very low when compared to other national priorities such as infrastructure, mining and natural resources.

Box 4.5.1 The state of nutrition in Tanzania

The Tanzania Demographic and Health Survey 2010 (TDHS) report revealed the continued higher prevalence of malnutrition among women and children; with the stunting rate among the children of 0-59 month standing at 42% and anaemia among women of reproductive age remaining at 59%. According to the recently released SMART survey conducted in 2014, some nutrition indices have shown gains in Tanzania, with stunting decreasing from 42% in 2010 to 34.7% in 2014, with acute malnutrition is maintained below 5% and underweight at 13.4% (see figure to right).

Despite some progress in overall stunting reduction, more than 2,700,000 children under 5 are stunted, about 435,000 suffer from acute malnutrition – and more than 105,000 of these children are severely acutely malnourished. Also indicators of infant and young child feeding (IYCF) practices have not improved between 2010 and 2014, and the coverage of iron and folic acid supplementation during pregnancy has not shown significant improvement across the country. This data shows that nutrition has not yet attracted sufficient political action, and has not featured high on Tanzania's development agenda.



[32]This is chaired by the Permanent Secretary, Prime Minister's Office and consists of members from the Government (permanent secretaries from the Ministries of Finance, Water, Health, Agriculture, Livestock and Fisheries, Women and Gender & Children Development), development partners, the private sector, civil society organisations and academia.

[33]It is chaired by District Executive Director, and District Nutrition Officer (Secretary). Other members include Heads of Departments (Planning and Budgeting, Finance, Health, Education, water and Livestock, Agriculture, Gender, Children and Women Development), CSOs (PANITA Members), Private sector, influential figures in the community and Religious Leaders. By December 2014, 70 councils have established the committees.

Global Day of Action 2014 © PANITA members activities.

Tracking nutrition resources at the local level

Efforts to track nutrition resources at the local level started in 2012, when PANITA, together with Save the Children Tanzania, conducted a Nutrition Policy Mapping exercise, gathering inputs from many stakeholders, including Government officials from all levels, Local CSOs, International NGOs and UN agencies. This was designed to: provide information on the extent to which the existing policies incorporate nutrition issues; identify gaps related to nutrition in the policies; and recommend issues for advocacy. The findings from the Policy Mapping, combined with the release of the **National Guideline** for Councils for the Preparation of Plans and Budget for Nutrition 2012, provided the impetus for PANITA to want to analyse public expenditure for nutrition at the local level. One of PANITA's core activities is to advocate for the increased prioritisation of nutrition in plans and budgets at the council level, in line with the Government of Tanzania's international commitments[34]. This gives a solid foundation for continued advocacy for increased prioritisation of, and accountability for nutrition.

[34]Such as the Malabo Declaration which aims to reduce stunting by 10% by 2025; and the **Nutrition for Growth summit** where Tanzania committed to reducing the prevalence of stunting by 15% in 2015 and wasting below 5%.

Rolling out the public expenditure review

As a starting point, PANITA commissioned an analysis of the public expenditure for nutrition of two districts, Lindi and Rwangwa, for the 2011/12, 2012/13 and 2013/14 budgets. The analysis focused on tracking actual expenditures as compared to plans and budgets. In the process a user-friendly tool for budget and expenditure tracking at district level was developed which can now be used in future by PANITA members to undertake expenditure tracking themselves.

The results from Lindi and Ruangwa districts highlighted the need to conduct similar exercises in other districts in order to understand the broader picture and properly inform the advocacy process. Whilst the long term goal is to have PANITA members conduct this exercise every year in all district councils across the country, the exercise in these two districts had involved a relatively expensive process involving a consultant. So it was decided that for long-term sustainability, this exercise should be undertaken by PANITA members. Financial resource limitations in 2014 meant the exercise could be commissioned in only five districts. So in 2014 PANITA members[35], from the Districts of Sumbawanga DC, Ikungi, Ludewa, Karagwe and Mkuranga, were selected for support for commemorating the African Day for Food and Nutrition Security, for activities covering popular mobilisation/SMS campaign, Panel Discussion, and district nutrition budget tracking.

PANITA shared the adopted tool from Rwangwa and Lindi initiative with the PANITA members in the 5 districts, through emails and phone calls. This was then followed up with remote backstopping support to enable them to collect the right information, but no formal training was delivered to the researchers. However, if PANITA had to do a similar exercise again, they have identified that they would do a pre-survey training workshop with all those involved, to establish a trustworthy, mutual and long-term working relationship. They would also want to have an expert working alongside them to support the PANITA secretariat and strengthen the team's skills in this area.

The local PANITA members conducted data collection in the five districts. This was possible due to the enthusiasm, cooperation, commitment and effort shown by members in implementing the initiative, along with the support from the PANITA Secretariat. PANITA members also received good cooperation from officials in those districts where the councils had established District Nutrition Steering Committees, and this has helped to improve ongoing collaboration with government officials.

However, despite obtaining useful data, the process was not without its glitches: some surveys remained incomplete due to unavailability of data, such as expenditure; there were delays due to lack of cooperation between some government officials and PANITA members; and in some instances, PANITA members did not fully understand the right information to collect. Such setbacks were more difficult where there was no operational District Nutrition Steering Committees, which was a stumbling block in some of the Districts.

When the data was analysed, results showed similar findings to those of the Rwangwa and Lindi study, as well as the Public Expenditure Report on nutrition of 2014: prioritisation of nutrition in plans and budget was relatively low. The council officials attributed this to the lack of a policy directive - such as the lack of budget guidelines and codes for allocation of nutrition resources within the Government budget. All this data is enabling PANITA to advocate strongly for increased prioritisation and accountability on nutrition.

[35]The following PANITA members were involved in this exercise from each District: Singida - Save the Mothers and Children of Central Tanganyika; Mkuranga - Tanzania Consortium of Nutritionist; Sumbawanga - Community Economic Empowerment and Legal Support; Karagwe - Vaima Enterprises; and Ludewa - AKWAYA-Asasi ya Kuhudumia wagane, wajane na yatima (Organisation for taking care of Widows, Widowers and Orphans).

Box 4.5.2 Insights and lessons

What do PANITA see as the critical ingredients contributing to their success?

- The presence and commitment of PANITA members on the ground enabled this work to take place – and in turn their involvement in this budget tracking has helped them see the value of being members of PANITA. That increases their passion for this work and strengthens the local multi-stakeholder platforms in which they are engaged;
- Tanzania has fully embraced the SUN framework – so recommendations are taken seriously by policy makers and planners, and this will help to sustain nutrition results into the longer-term;
- A conducive policy environment, provided through the National Guideline for Nutrition Plans and Budgets in 2012, was a strong basis for our work;
- The existence of District Nutrition Steering Committees in many districts;
- The development of the tools and methodology on how to do expenditure tracking, which were developed by an expert and which PANITA then shared with its members, so they could coordinate and conduct district level expenditure tracking themselves;
- Close working relationship with the government at all levels.

Insights for future efforts from lessons learnt:

- Continued sensitisation and capacity strengthening of PANITA members moving forward will be key for coordination of nationwide efforts;
- Building constructive long term relationships with council officials;
- Mobilising champions in support of PANITA advocacy efforts towards increased investments and accountability;
- Expansion of PANITA membership to cover geographical locations where CS presence needs to be strengthened in Tanzania;
- Advocacy for the establishment of District Nutrition Steering committees in all districts of Tanzania;
- Working with academia and other stakeholders to build budget analysis and data collection expertise in curricula related to nutrition country-wide, through both pre-service and in-service training;
- Cross learning with other countries embarking on similar efforts will be necessary, to accelerate progress of SUN countries in this area.

Case Study 4.6 Following the Funding: Nutrition for Growth (N4G)

At the Nutrition for Growth Summit in 2013, donors pledged USD 4.15 billion for nutrition-specific programmes (those targeting the immediate causes of undernutrition) and USD 19 billion for nutrition-sensitive programs (which address key underlying contributing factors of nutrition and enhance the coverage and effectiveness of nutrition-specific interventions). This was an essential step on the long-neglected road to increase global resources to combat malnutrition and to support country-owned efforts to improve child nutrition. The Nutrition for Growth (N4G) donor accountability scorecard ("Following the Funding: Nutrition for Growth") was therefore designed to: hold donors to account for their commitments in 2013 (the most recent year for which data is available, as of November 2015); and to encourage new pledges at the next Nutrition for Growth Summit in summer 2016, by shining a spotlight on the fact that current nutrition funding levels are not sufficient to meet ambitious nutrition targets set by the World Health Assembly for 2025, some of which are also included in the SDGs.

The accountability tool tracks for 14 donors[36]: pledges from the **Nutrition for Growth Summit** in 2013; provides a rating on how ambitious the original pledge was; and tracks delivery against that 2013 pledge (the most recent year for which data is available thus far). The tool also describes steps needed at the Rio de Janeiro N4G Summit in 2016 to stay on track for meeting public commitments, or, when appropriate, steps to make up for under-ambitious 2013 pledges. The scorecard may be used to start or reinvigorate a conversation around nutrition-specific and nutrition-sensitive disbursements with donor governments, to push for increased disbursements of pledges from 2013 (and ask that 2016 be a moment for new pledges), and to set the pace for delivering existing pledges for 2020 – and make clear what will be needed to meet targets by 2030.

The tool, which lives online and is consistently updated as pledges are delivered, was developed by ACTION[37] and others involved in the civil society community, in consultation with those in the academic community (working on the Global Nutrition Report or with OECD DAC data), and in engagement with the donor community. Their stance is that while national governments must also invest in partnership in their national responses to promote nutrition, a large push from donors is still needed.

It was originally released in April 2015 and was updated in September 2015, coinciding with the release of the Global Nutrition Report for 2015, which included self-reported data from donors on their nutrition-specific and nutrition-sensitive spending.

Following the Funding Nutrition for Growth, 2015

Download the report at:
www.action.org/resources/item/following-the-nutrition-funding

[36]Focuses on the N4G donors, including some national governments and some foundations: Australia, Bill & Melinda Gates Foundation, Canada, Children's Investment Fund Foundation, European Union, France, Germany, Ireland, Japan, The Netherlands, Norway, United Kingdom, United States, and World Bank Group.

[37]ACTION is a global partnership working to influence policy and mobilize resources to fight diseases of poverty and achieve equitable access to health. ACTION partners work across five continents in both donor and high burden countries. For this exercise, ACTION partners worked in their respective markets with contacts through the International Coalition for Advocacy on Nutrition (ICAN) and the Generation Nutrition campaign, as relevant.

[38]The methodology for this product, along with the full analysis by market, is available **here**.

Progress so far

Short term impacts of the donor scorecard have included reinvigorated conversations within civil society in donor countries, between civil society and donors, and within civil society in high burden markets on the development of possible similar tools. It has also helped spur useful discussions on the shape of a successful Rio Nutrition for Growth Summit in 2016 from donor perspectives. There has also been significant social media coverage of the scorecard around launch dates, and feedback that using the tool in hard copy for in-person meetings has been particularly powerful in terms of driving useful discussions on ambition and the work left ahead of all working to defeat malnutrition globally. Since the product's launch in April, it has been visited around 1,500 times online (as of November 2015). Approximately 2,500 copies have been distributed on paper at events including the World Bank Spring Meetings, the UN General Assembly, the 2015 SUN Global Gathering, and various country-level GNR launches and other policy events. The product is also available in French for Francophone audiences.

It is hoped that the tool will help set the pace for the second Nutrition for Growth Summit in 2016 and will continue to allow advocates in donor markets to push for transparency and accountability. While the tool focuses on accountability for donors and many who use it will be conducting donor-facing advocacy, there is also a role for the tool to serve as an example of accountability scorecards that could be developed for those advocating around their own national health budgets and accountability for N4G pledges, in terms of defining what constitutes an ambitious pledge, how on-time delivery of pledges is judged, and setting the pace to the second Nutrition for Growth Summit.

Critical Issues

The largest success factor for this work was demand from advocates at national and international levels for an accountability tool that looks across donors, and that the analysis and metrics applied are standardized and transparent across the different donors analysed. While political cycles may change short-term advocacy contexts in individual countries, public commitments look beyond those cycles.

A tool like this has staying power, as well, as it analyses commitments already made (by donors) for 2020 – some time away – while residing on an updateable platform online. It is re-evaluated at every appropriate opportunity, and constructive criticism has led to changes in the tool to make it more useful to those using it for advocacy purposes, which also increases its usability and staying power.

Box 4.6.1 Creating the accountability tool

ACTION partners or allies in the countries where the 12 donors are located (for the 10 donor countries and 2 foundations), worked to develop the tool. To ensure quality control and to create mutual understanding across all working on the tool, it was very important to have a clear methodology developed to ensure standardisation in approach and in the way progress was measured for each donor. A rigid but robust methodology is particularly crucial for an accountability tool. This was developed through careful consultation with the partners involved in developing the tool, outside allies, and through feedback from individual donor conversations. Any accountability tool will entertain quite a few questions on methodology[38], so it is always important to highlight the metrics used for evaluation, and explain why these are being used within the tool itself and also through related communications or media efforts. It is crucial to receive feedback on the methodology from those being evaluated (in this case donors) to maintain credibility. The aim is, as far as possible, to create a conversation rather than a shouting match. The right accountability tool will do this.

The development process for this tool included collaborating with civil society allies in coalitions in each country, using existing structures for strategy conversations provided by the International Coalition for Advocacy on Nutrition (ICAN) platform, and Generation Nutrition. Colleagues working in each country also worked to reach out to their contacts at donor agencies to clarify their self-reported data and drive discussions on what the Rio Summit could mean for their work on nutrition. While no explicit written agreement was needed, this transparent methodology, developed collaboratively with all partners and using feedback from those outside the process and being held accountable, ensured the tool would be taken seriously.

A similar tool was developed by CSONA Malawi in August 2015 to further N4G accountability discussions on the regional level (see Case 4.3).

Case Study 4.7 Accountability for Compliance on the International Code for the Marketing of Breast Milk Substitutes in Sri Lanka

Building the Voice of Community Based Organisations in Sri Lanka so they can link with the Teeth of the Marketing Code of Breast-Milk Substitutes in order to Bite

Sri Lanka is classified as a low middle income country and is on track to reach all the Millennium Development Goals, except the nutrition targets, with under five malnutrition remaining a particular public health problem[39]. The Government has launched many initiatives to reduce childhood malnutrition, including several that were focused on increasing breastfeeding[40]. However, people remain largely unaware of these government-led nutrition interventions, tend to see state services as a privilege rather than a right, and have limited knowledge on their rights of access to services. As a result there is little or no public demand ("voice") to improve access or the quality of services.

Given the existence of the Sri Lanka Code for the Promotion of Breast Feeding and Marketing of Breast Milk Substitutes and Related Products (see Box 4.7.1), employment laws concerning maternity and breastfeeding, and various government programmes that entitle mothers to food stamps and food supplements, the Scaling Up Nutrition People's Forum (SUN PF) - the SUN Civil Society Alliance in Sri Lanka – is increasing civil society awareness of these rights. With this awareness of their rights, mothers and the community-based organisations that support them will be in a better position to link with government accountability systems ("teeth") where public policy may be being inadequately implemented or laws may be being broken. Where government accountability systems are not as accessible or strong as they need to be SUN PF Secretariat will then work through the SUN Movement with government, to strengthen the connection between citizen voice and government teeth, to enable strong "bite".

Sri Lanka © Save the Children

[39]According to the UNICF MRI Micronutrient survey 2012: low birth weight prevalence is 16.5%; under five wasting is 19%: and stunting is 14%.

[40]The Sri Lanka Code for the Promotion of Breast Feeding and Marketing of Breast Milk Substitutes and Related Products, employment laws concerning maternity and breastfeeding, and various government programmes that entitle mothers to food stamps and food supplements.

Breastfeeding Madagascar © National Nutrition Council, Madagascar

Box 4.7.1 The Sri Lanka code for the promotion of breast feeding and marketing of breast milk substitutes and related products

The Sri Lanka Code for the Promotion of Breast Feeding and Marketing of Breast Milk Substitutes and Related Products (BMS) was developed in 1981. Although any violation of the Code has been designated a punishable offence under the Consumer Affairs Authority Act and the Food Act (which prohibits the advertising of infant formula[41]), enforcement is weak due to the long amount of time it takes to reach a decision regarding violations of the code.

Meanwhile, non-governmental organisations, professionals and professional groups are obliged under the Code to draw the attention of manufacturers, distributers and suppliers of designated products to activities which are inconsistent with provisions of the code, so that appropriate action can be taken.

There is however evidence that the Code is not being adhered to. In March 2012 the Secretary of Health issued a circular to all government health-related departments advising staff that he had been made aware of non-compliance with the BMS code. In June of the same year, he then issued a further circular to all health service staff advising them that it is strictly against the BMS code to accept sponsorship for foreign visits at the expense of BMS manufacturers or distributors, without disclosing this to the committee responsible for monitoring the BMS code. Added to this, the general impression of medical professionals is that there is poor enforcement of the BMS code and that consequently it is not adhered to.

Therefore, despite the relatively high statistics for exclusive breastfeeding - 76% during the first six months of life[42]- these stories about violations of the BMS code have led to the SUN PF Council deciding to verify the extent to which the BMS code is being adhered to and to test the accountability systems that government has in place for tackling non-compliance.

[41]Violations can be reported to the Secretary of Health or the Secretary/ Chairperson of the Committee of experts appointed to monitor the Code. The Committee comprises the Secretary to the Ministry of Health, the Director for Maternal and & Child Health and approximately 30 members, including personnel from relevant directorates within the Ministry, representatives of other associated ministries, academics, and representatives of UN organisations and the civil society. Violations are initially discussed at the Committee level and sent to the Consumer Affairs Authority if further action is required.

[42]UNICEF MRI Micronutrient Survey 2012

As a first stage in this process, the SUN PF Secretariat developed a questionnaire (see further in Box 4.7.2), so civil society members can monitor current breast feeding practices within the communities they are working, as well as investigating the extent to which nutrition interventions are reaching mothers and codes and laws are being complied with. In this process, they are also informing women of their rights, as well as the existing accountability systems they can use to claim and protect those rights.

Box 4.7.2 The questionnaire

The questions related to accountability in the questionnaire covered the following topics:

Promotion of Breast Milk Substitutes: The questionnaire probed whether the mothers had been exposed to adverts, or if they or their family had received any free samples, of breast milk substitutes or products such as feeding bottles, teats or pacifiers; and whether during pregnancy they had attended any group demonstrations showing the preparation of infant formula.

Information regarding the importance of breast feeding: The mothers were requested to list from whom they received information on the importance of breast feeding during pregnancy. Mothers could list more than one person, for example the Public Health Midwife, their mothers, mothers-in-law or friends.

Supplementary foods received by lactating mothers during the first six months after delivery: The questionnaire probed which supplements the women had received and compared this to those which they were entitled, such as the ration size of the Thriposha Program (of 1500 grams per month). SUN PF is planning to use this data to lobby for targeted supplementary feeding, rather than blanket feeding, with appropriate ration sizes.

State assistance to lactating mothers: Since February 2015, the government launched a programme to provide food stamps to lactating mothers who have babies under 4 months. However, only one of the mother's interviewed had received food stamps. When we came to analyse the data in the questionnaire we realised that we had not asked for the age of the youngest child, and so it was not possible to find out whether the other women had been eligible for the food stamps. The piloting and data analysis helped us amend the questionnaire so that it would state the age of the youngest child, so that we can understand eligibility for the food stamps and hence whether mothers are availing of their rights.

Employment during Pregnancy: Only one of the mothers had held a job during her pregnancy: she worked at a garment industry and had been granted 84 days of paid maternity leave, and her workplace had provided her with breast feeding facilities and an hour off daily for breastfeeding upon returning from pregnancy. However since the other 12 women were unemployed during pregnancy, we could not find out how the formal and informal sectors provide space for breast feeding. We learnt therefore that we need to get a more representative sample of women when we roll out the questionnaire more widely, so that we can get a better understanding of the extent to which the law is adhered to in all types of employment conditions, and promote the relevant laws more widely – and so we can then support those women who are not receiving their entitlements.

Methodology

- SUN PF Secretariat first identified the range of issues it wanted to learn more about to in order to inform its future programming and advocacy work. The questionnaire covered several areas, including those which aimed to check the extent to which government policy was being adhered to, such as: the implementation of the BMS code and employment legislation as it relates to breastfeeding and maternity rights; and the extent to which mothers received the nutritional supplements to which they were entitled;
- The questionnaire was translated into the two local languages of Sri Lanka, namely Sinhala and Tamil;
- SUN PF piloted the questionnaire in a semi-urban setting of the Wattala Divisional Secretary's area, in the Western Province. The pilot location was selected due to easy access and the presence of World Vision - one of the members of SUN PF, who volunteered to organise the mothers' group;
- For piloting purposes it was decided to have a small sample size (13 mothers), and that it was not necessary to have a representative sample of the population of mothers, since the aim was to test the style of questioning within the questionnaire and to do a 'dummy run' of analysing the findings to see how we will use the information generated. It would also allow the SUN PF to identify any gaps or changes required for the questionnaire;
- After a brief introduction, the questionnaire was administered to the mothers by one person, on a one-to-one basis;
- The data was then collated and analysed – and through this process the researchers were able to identify where they needed to adjust some questions before rolling the survey out more widely.

The next steps SUN PF has now started administering this questionnaire in many districts and has recently met to discuss advocacy and communication plans on the basis of the different data being generated in each location. This information will be used by SUN PF to advocate and lobby the decision makers and Parliamentarians, reinforcing this lobbying through the media, in alignment with the national nutrition plan.

Introducing and administering the questionnaire to the mothers' group © Dr. Dula De Silva

5. Key Issues and Recommendations

The lessons highlighted in the overview of accountability (Section 2) and the different accountability processes that civil society can promote (Section 3), as well as from the Case Studies, suggest ten key issues and recommendations for CSAs to consider as they take this work forward to ensure greater accountability for nutrition, within the SUN Movement.

1. **Accountability is about holding to account on commitments:** Your accountability work therefore is only as good as the strong clear commitments that have been reached and included in policies, plans, budgets and pledges, or other mechanisms. As called for in the 2015 Global Nutrition Report, this means ensuring commitments made by Governments or others are Specific, Measureable, Achievable & Ambitious, Relevant and Time-bound.

Recommendation 1: Nutrition advocacy work needs to include ensuring SMART commitments on nutrition by Governments, donors and private sector, including around the 2016 Rio follow-on summit on Nutrition for Growth.

2. **Nutrition accountability needs a multi-stage, multi-level & multi-sector approach:** Nutrition can be improved on many fronts – working on the structural issues causing nutrition such as poverty and empowerment, and with nutrition-specific or nutrition-sensitive interventions. It can also fall apart on many fronts – poor planning or budgeting, corruption, incompetence; and at each level – from national to district to community. Growing and maintaining consensus on an issue works best when multiple tactics are used at the same time (**McGee and Gaventa, 2011**; **Fox, 2014**), with citizen action having 'vertical integration' through linking with governmental reforms and reform champions, combined with wider mobilisation by civil society, social movements, citizens and reformers within different layers of government. Accountability work needs to link local and national levels: MPs can be a strong ally to link the national and the local; and so can the CSAs own membership. District Nutrition Steering Committees (or similar structures), combined with performance monitoring tools and budget tracking tools, bring these two actors together for strong local results. Fostering mobilisation of individuals through the CSA membership and social movements will help to maintain momentum. This means a single-strand approach to accountability is not going to work – you need an accountability system that:

- Works across each relevant sector (including: health, nutrition, education, agriculture, water & sanitation, and gender);
- Operates at multiple levels (vertical integration): district, regional, and national – and beyond, where there are Regional or International processes that can be used; and
- Engages at different stages around the Social Accountability System: planning & budgeting, expenditure management, performance monitoring, oversight and public integrity.

Recommendation 2: CSAs will achieve greater impact if they work around different parts of the whole Social Accountability system, rather than just on one specific accountability tool, at one level or with one sector.

3. **Nutrition accountability needs a multi-stakeholder, consensus-building approach:** From Ministers and departmental heads, through to local officials and front-line workers, state actors can be engaged in or impacted upon by your accountability work. Similarly your accountability work will impact upon the many Nutrition Champions you are growing (such as MPs, the media or public figures), the members of your alliance, as well as community members at grassroots level gathering evidence and data or claiming their rights. All of these people need to be convinced that nutrition is an important priority and that it is worth taking action for greater accountability. They also need to believe in the SUN movement, its legitimacy and credibility – and that making the effort you are asking of them is worthwhile. At the same time, you need to avoid "putting all your eggs into one basket", focusing only on one group[43].

[43]Some nutrition champions (e.g. MPs) can be engaged across multiple accountability initiatives, helping open up spaces, raise awareness and spotlight an issue. However, as the Zambia case suggests, working with MPs is perhaps a medium-term strategy. requiring a while for impact, since despite increased focus by MPs on nutrition, only very modest budget increases have taken place to date. Sometimes 'reform champions' may themselves be pulled in different directions by competing priorities, so may not choose to prioritise nutrition in their parliamentary relations.

Accountability work on nutrition will also be more effective if it can connect to other broader efforts on accountability. These can be at global level, within the framework of the SDGs, or continental initiatives, such as the African Leaders Malaria Alliance, which is tracking indicators on exclusive breastfeeding, and Vitamin A coverage. Similarly, at national levels, nutrition advocacy and accountability can be strengthened by linking to broader coalitions working on issues of public financing and taxation (as in Zambia) or access to information (as in Malawi).

This multi-stakeholder approach to nutrition accountability requires you to focus on:

- Being non-partisan – so that ALL actors into the future are convinced by the information you generate and want to address it;
- Effective coalition-building, so that all feel part of the journey and are proactive and committed
- Effective facilitating of the interface between state and civil society and other actors, so that all trust the fairness of this space;
- Inclusion of social movements and the members of your CSA as they reach out across the entire country, reaching the poorest people so they too can make sure they achieve their nutrition rights;
- A strong focus on women's inclusion and empowerment in accountability efforts, as a result which of itself has strong nutrition impact.

Recommendation 3: Nutrition accountability work needs to build consensus, be non-partisan, and bring in people from all sectors and levels, into a collective force for more effective nutrition efforts and results.

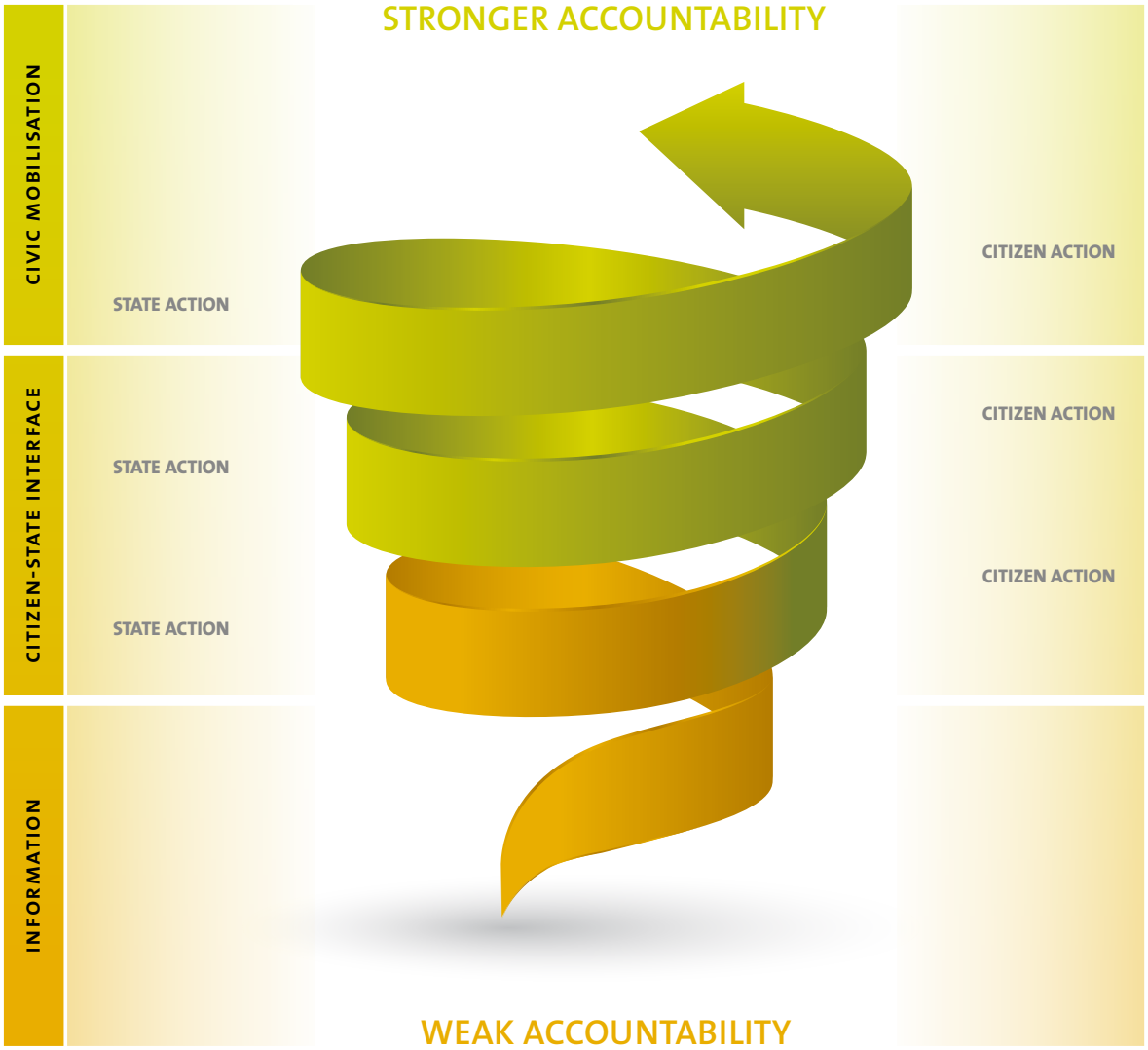
4. Accountability needs a multi-media approach: To be able to persuade people - at all levels and all stakeholders – of the need to take your accountability work seriously, you will need strong stories and evidence of the need for them to prioritise nutrition – and also evidence and data on where the system is not working. The information you gather needs to come from across the country – outreaching via CSA members, social movements, local media and even social media where this feels appropriate. And similarly the information you generate needs to reach a diverse array of people and needs to do so consistently across time and across political parties. Your approach to communications therefore needs to include meetings, radio, television, music, cartoons, posters, publicity events where people publically sign pledges, and so on.

Recommendation 4: CSAs should apply creative communications strategies in their accountability work, to ensure consistent messaging that reaches all those you need to engage with.

5. Accountability needs the right data: both clear information tracking spending against commitments, trends in nutrition outcomes and results, as well as human interest data on the situation of malnutrition: The combination of hard persuasive data, evidence and stories (as used in Malawi to persuade MPs, or in the consensus forums in Peru) shines a powerful spotlight onto the need for action. Where this is regular (e.g. the annual data in Peru), this can be analysed by civil society and government together, to agree on corrective actions where needed. Where information is not available, CSAs can work with donor, UN and academic networks to push for increased frequency of nutrition data collection and dissemination, and greater transparency around nutrition spending, programmes and their outcomes. As seen in the Zambia and Malawi cases, getting agreement amongst stakeholders on what counts as nutrition spending is essential for meaningful accountability work around budgets. The CSN should share amongst its members how such practical and highly technical aspects are being resolved, to help reach a collective consensus within the SUN movement. Human interest stories can provide powerful information to complement such hard data, and CSA accountability work can make use of one of the strongest data-gathering and communications vehicles you have to help you raise awareness, generate interest and mobilise for action.

***Recommendation 5:** CSA advocacy is needed for greater investment in more frequent data collection on nutrition outcomes, results, service coverage, budgeting and expenditure, preferably within the framework of the systems that will be set up under the SDGs. This should include participatory data collection involving civil society actors.*

6. **Multiple strategies for accountability that evolve over time are needed to respond to the changing context:** As for any activity, energy for change can build up, with each 'win' for the SUN CSN network leading to further engagement (see the Malawi and Peru case studies); or it can unravel as consensus is lost around the issue (e.g. the positioning of nutrition within government's structures in Malawi) or a badly-managed initiative or relationship backfires and erodes other 'wins' already gained. Each accountability activity should therefore not be seen in isolation, but as a building block for other activities and gains that need to be protected from being lost once more. Obstacles and challenges will arise that are specific to your context, and plans will have to be adjusted. Working on a complex issue, in constantly changing local contexts, requires an adaptive and iterative approach to planning, as you see what works, what new opportunities appear and what challenges arise that need addressing. This iterative approach is highlighted in the Figure to right, showing cycles of efforts to build stronger accountability through citizen and state action (**Grandvoinnet et al., 2015**).



***Recommendation 6:** Nutrition accountability strategies need to be adapted over time, adjusting to changes in the context and the opportunities and bottlenecks that emerge. They need to be based on deep understanding of the local context, and the power and incentives of different actors. It involves reviewing who should be accountable for what and to whom, and determining what are the most strategic opportunities for promoting greater accountability, in order to lead to improved effectiveness and outcomes in the fight against malnutrition in your particular local context.*

7. **Use different tactics for engagement:** For multi-stakeholder alliances such as the SUN, the style of engagement is usually collaborative: as William Chilufya of Zambia CSO-SUN put it "You need to offer constructive criticism to the Government of Zambia, aimed at building engagement and focus, and not destroying". These relationships are built on trust so collaboration is key. However, as noted by Siapha Kamara of SEND West Africa and member of the SUN CSN Steering group, "you can collaborate and still have major disagreement over for example strategies or % of commitment achieved but be prepared to listen and learn from each other; uncritical collaboration among partners does not promote innovation and transformation in behaviour or policies". Sometimes a more openly critical approach is needed at key moments to open up a space that is otherwise resoundingly closed. For example, in India it was the initial more confrontational mobilisation by civil society activities through legal action that started to draw attention and open up the space for more consensual and collaborative work on nutrition. This chimes with research from **Jonathan Fox** and **John Gaventa & Rosemary McGee** that progress comes through cycles of cooperation and conflict.

***Recommendation 7:** CSAs will need to apply a mix of tactics in their accountability work, depending on the local context, promoting both collaboration, consensus-building and mutual accountability, but also being aware of the power of activist allies to play a more confrontational role, where significant blockages arise.*

8. **Civil society accountability work should integrate with existing accountability systems, to strengthen them and make them sustainable:** Don't reinvent the wheel. The strongest impact comes when you are able to strengthen the system, not only to challenge it. Any accountability action – such as budget analysis, expenditure tracking or a Community Score Card – that is implemented without the involvement, and ideally collaboration and buy-in of those it is intending to change (i.e. state actors, donors or private sector), will break trust, and may fail. Wherever possible look to link your accountability work to existing systems ("sandwich accountability") or to foster the development or strengthening of such systems - be they systems through which you can report corruption, or provide feedback on performance or cross-check a budget transfer.

***Recommendation 8:** CSAs accountability work needs to connect with enforceability mechanisms within Government, linking civil society "voice" with the "teeth" of systems within Government (such as internal performance management systems within Ministries, cross-sectoral coordination mechanisms, audit, legal systems, etc.).*

9. **Increasing the focus on women in nutrition accountability processes is essential:** women's empowerment is a strong contributor to accountability – and for nutrition results. The SUN CSN needs to highlight in its communication materials, tools and training materials on accountability how SUN CSAs can more fully integrate gender into their work. For example, the budget analysis guidance could provide guidance on how to include gender analysis of those elements of the budget that are not already entirely focused on women (e.g. do a gender analysis of the budget for WASH, conditional cash transfers, and small-holder farmer support for processing of nutritious foods); performance measurement tools could look to use diverse engagement strategies with women and focus on specific barriers they experience to engagement in accountability processes; CSAs could support women's empowerment approaches through their membership to increase their inclusion in the District Nutrition Steering Committees, and so on.

***Recommendation 9:** Ensure a specific focus on gender and nutrition in all your accountability and advocacy work.*

10. **Promoting accountability means also "walking the talk" on accountability:** CSAs will be much more credible promoters of the accountability of Government, private sector or others if they ensure their own accountability. This includes accountability of CSAs to communities affected by malnutrition and the populations in whose names they act ("forward accountability"), to their members and peers ("internal accountability"), as well as "upward accountability" to donors and Governments. Advocacy for ensuring Government nutrition programmes are accountable to communities, or for SMART commitments on nutrition, or for transparency of information on budgeting and expenditure and nutrition outcomes, will be much more powerful if those making that case are also being accountable to communities, making SMART commitments or being transparent on their budgeting, spending and results.

***Recommendation 10:** CSAs need to "Walk the talk" and ensure their own accountability. CSN should promote greater sharing of experiences and tools for accountability of CSAs.*

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