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01 Background

Nutrition for Growth (N4G) Accountability Working Group

Members

- Access to Nutrition Foundation
- ACTION Global Health Advocacy Partnership/RESULTS UK
- Bill & Melinda Gates Foundation
- Food and Agriculture Organisation
- GAIN (SUN Business Network)
- Global Nutrition Report
- Save the Children UK (SUN Civil Society Network)
- UNICEF
- USAID (SUN Donor Network)
- World Health Organisation
Accountability Framework

Meeting global nutrition targets requires an independent, coherent, streamlined, unified, well-financed and cost-effective accountability framework to hold all stakeholders, including governments, businesses, civil society organizations (CSOs) and philanthropic organizations accountable. The accountability framework will provide the criteria and guidance for how the commitments are to be formed and made in line with the Commitment-Making Guide, report the commitments made to meet the targets and monitor and evaluate the actions taken to deliver the commitments.

1 You can download the Nutrition for Growth Commitment-Making Guide at https://nutritionforgrowth.org/
Current Landscape and Findings

Through the Working Group process, the current nutrition accountability landscape was mapped, discussed and critiqued. The summarised conclusions from the group were the following:

01 Coordination
The WG has agreed that there is not a need to create more frameworks but, instead, focus on the coordination of existing mechanisms. In particular, efforts are needed to ensure a single entry point for reporting data in order to combat ‘reporting fatigue’, and there is a need to ensure coordination between the various entry points and their upward flow of data, so there is a coherent and streamlined process.

02 Different Constituencies
Multiple constituencies will need to commit to new actions in 2020/2021, but the WG has agreed that one mechanism could not sufficiently ensure the nuances of each constituency is specifically addressed in ensuring commitments are accountable. Despite the differences, each constituency agreed on the need to avoid duplication and for clearer and simpler processes.

03 Accountability Built into Pledge
The WG agrees that the Commitment-Making Guide — and, therefore, Nutrition for Growth (N4G) pledges — ensures that accountability is considered an inextricable part of any pledge. When a pledge is made, it should be easy for the pledger to understand how it will be held accountable, and it should be explicitly stated within the pledge.

04 Impact and Investment
There is a need to retain a focus on ensuring good monitoring and reporting, and streamlining this process can help create the capacity for more focus on impact.

These are shared in more detail in Annex A.

The Global Nutrition Report (GNR) is currently the key accountability mechanism for N4G commitment tracking, making this mechanism the natural selection for coordinating the overall nutrition accountability framework. It was established in 2014 following the first N4G summit in 2013. It has since been published annually using the best available data to track progress against global nutrition targets and the commitments made to reach them. Through a comprehensive report, interactive Country Nutrition Profiles and N4G Commitment Tracking, the GNR sheds light on the burden of malnutrition and highlights progress and working solutions to tackle malnutrition around the world.

2 The original final paper referenced 2020, but before publication, the summit was postponed due to the COVID-19 pandemic.
02
Recommendations
Given the above landscape, the Accountability WG proposes the following:

01 Form an independent, coherent, streamlined, unified, well-financed and cost-effective **Nutrition Accountability Framework**, formed by the Global Nutrition Report and other key existing **Accountability Mechanisms**.

02 The GNR will lead, coordinate and implement recommendations that follow, contingent on available funds and resources (see the financing section below). The GNR should also collaboratively lead and implement accountability criteria and mechanisms for constituencies that currently do not have an accountability mechanism in place.

03 Leverage and realign existing **Accountability Mechanisms** to enable better central coordination and analysis of data. Although several different 'accountability mechanisms' exist that serve distinct and/or common purposes and priorities, there is a clear need to bring those together, identify requirements and areas of improvement/focus, maximize use of resources, avoid duplication of effort and minimize reporting burden. This should allow for the nuances of different accountability mechanisms whilst ensuring cohesion within one structure.

04 The GNR and the Accountability Mechanisms should jointly establish common principles for improving global nutrition accountability surveillance based on an evidence- and consensus-based processes following established criteria (e.g., Delphi method).

05 Harmonize — to the extent possible — the methodology, design, collection, processing and reporting of data by each of the accountability mechanisms; the **GNR** should be the central repository of all data and be responsible for the analysis and dissemination of all findings in a single place.

06 Create a publicly accessible and interactive database of commitments and actions that can be used to generate key accountability indicators.

07 Develop and validate accountability indicators that can be standardized, collected and monitored at a local, national, sub-regional, regional and global level.
Accountability frameworks should be institutionalised. The commitments should not rely on individuals, but institutions should ensure a monitoring system is in place for sustainability of tracking and reporting.

Expand nutrition accountability surveillance in all countries worldwide and for all relevant stakeholders, ensuring it becomes an annual reporting requirement with appropriate technical support and guidelines.

Disseminate the findings of nutrition accountability surveillance activities, including feedback from stakeholders and end users.

Ensure sustainability of global nutrition accountability surveillance through leveraging existing resources and infrastructures and continuous funding.

Continuously monitor and evaluate the Nutrition Accountability Framework in order to drive better data and stronger commitments and enable faster, efficient, effective and real-world adaptations.
Financing

The above recommendations maximize intended impact and benefits in a cost-effective way by leveraging existing infrastructures and processes. Other alternative arrangements, such as a *de novo* mechanism for accountability, would have significantly more funding needs than the proposed realignment. Still, there is the need for central coordination, dissemination and reporting (as outlined above) as well as introduction of accountability mechanisms for constituencies that currently have none; that involves additional resources that need to be carefully considered and estimated. Financing is needed for this framework to exist and for accountability to be a core outcome of the Tokyo N4G Summit 2021. A decision on funding is needed as early as possible in 2021 in order for this work to commence.

This work is dependent on funding commitments for the accountability process. Support and funding for the Nutrition Accountability Framework can be sought from the following sources: (1) stakeholders making N4G commitments should also make funding commitments for the Nutrition Accountability Framework, including SUN Donor Network countries; (2) GNR donors; (3) donors from each of the other Accountability Mechanisms.
# Timing

A decision on the proposed Nutrition Accountability Framework and funding is needed as early as possible in 2021 in order to enable a concrete planning and evaluation phase to define the framework in detail and be ready to act on time for the N4G Tokyo Summit.

<table>
<thead>
<tr>
<th>Pre-Tokyo summit:</th>
<th>During Tokyo summit:</th>
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</thead>
<tbody>
<tr>
<td>The group recommends that, at a minimum, initial financing needs to be secured as early as possible in 2021 to support the creation and coordination of a technical working group to work on defining the accountability framework, tools and methods, resources and costs (i.e., financial support of the planning and evaluation phase). The group recommends that framework should be fully funded by mid-2021, if not earlier.</td>
<td>The group recommends that all commitments should be reviewed to ensure they are SMART and will be possible to track, milestones defined. Record commitments and accountability framework, including milestones.</td>
</tr>
<tr>
<td>After Tokyo summit:</td>
<td></td>
</tr>
<tr>
<td>Develop and build on existing infrastructures to put in place mechanisms to track commitments.</td>
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</table>
03 Realignment Proposal
**Global Nutrition Report:** The function of the GNR is to coordinate the overall Nutrition Accountability Framework and produce an annual report on progress on global nutrition as well as show commitment disbursement. It will work with existing mechanisms in the different N4G stakeholders in order to define and streamline a reporting process grounded in technical expertise and harmonise reporting templates and processes. The GNR will check the quality of commitments and define the tracking methodologies in collaboration with a technical working group formed by each of the existing accountability mechanisms.

Note: *The GNR is not proposed to become an advocacy organisation. Instead, it will continue to provide data to advocacy organisations, such as ACTION, for them to analyse and produce their own documents.*

**Accountability Mechanisms:** Each constituency group (donor governments, national governments, businesses, philanthropic organisations, CSOs and UN agencies) that may make a commitment will have a slightly different process based on the existing accountability mechanisms they report to, while for specific constituency groups, there is currently not an accountability mechanism in place. Each of the existing Accountability Mechanisms will work with the GNR to harmonise reporting templates and processes whilst allowing for slight nuances, as needed. The Accountability Mechanisms and the GNR will work towards developing a common reporting mechanism and data repository for making key indicators and findings from independent analyses publicly available, leveraging existing repositories. It is important to note that tracking for 2021 will start in 2022, so the interim two years will be spent in coordination, structuring and improving processes, contingent on securing the required resources. The expected constituencies and their accountability mechanisms are:

<table>
<thead>
<tr>
<th>Constituency</th>
<th>Accountability Mechanism**</th>
</tr>
</thead>
<tbody>
<tr>
<td>01 Donor Governments</td>
<td>None*</td>
</tr>
<tr>
<td>02 National Governments</td>
<td>WHO/FAO</td>
</tr>
<tr>
<td>03 Businesses</td>
<td>ATNI</td>
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<tr>
<td>04 Philanthropic Organisations</td>
<td>None</td>
</tr>
<tr>
<td>05 Civil Society Organisations</td>
<td>None</td>
</tr>
<tr>
<td>06 UN Agencies</td>
<td>None</td>
</tr>
</tbody>
</table>

*This is currently being done by GNR. Discussion is needed with donors; the intermediary could be SUN via the SUN Donor Network.

** The GNR is currently playing a role in all of these constituencies and is proposed to work with the listed mechanisms in its role as 'central accountability surveillance unit'.
In the case of ‘no existing accountability mechanism’, the commitment and tracking could be designed and implemented by the GNR as the ‘Central Accountability Surveillance Unit’, or an intermediary mechanism may be necessary. The mechanisms will work to review commitments to ensure they are SMART and will be informed by GNR, in collaboration, of methodology for tracking.

**Oversight Group:** Acts as a space for dialogue between the GNR, Accountability Mechanisms and constituencies. It holds the GNR to account as well as ensures cohesion within the new framework. This group could be absorbed by the GNR Stakeholders Group with explicit reference and changes to its terms of reference.
Next Steps
Technical WG

Upon agreement of this process and securing of funding, a technical working group will need to be created in order to develop the required processes and templates for the mechanisms and for tracking to ensure future comparative data that is useful to the GNR. This group should consist of key representatives from each of the constituencies and existing accountability mechanisms chaired by the GNR. The various accountability mechanisms have different experiences and expertise, and there is a need to ensure all are sufficiently ready to participate in the accountability framework through a collaborative approach. The rules and procedures of this working group need to be considered and proposed by the GNR in collaboration with representatives of other accountability mechanisms. The GNR will oversee and coordinate, in its role as the central accountability surveillance unit for the framework, the creation of methodologies and tools.

The group should report to the N4G Tokyo advisory group and the GNR stakeholder’s group.

- GNR (Chair)
- ACTION (Advisor – to ensure neutrality and continuity to the proposed framework, but without taking an oversight role, which will be performed by the oversight group)
- Representative from each existing accountability mechanism (WHO/FAO, ATNI)
- Representative from Donor network (TBD)
- Representative from MQSUN+
- Representative from Philanthropy (BMGF)
- Representative from CSO (TBD)

The group should be made up of technical experts who will be responsible for developing precise templates and creating methodologies.
Annex A

Landscape analysis & Recommendations presented in Seattle
Due to the variety of stakeholders and frameworks for action, the accountability landscape is crowded. This is more the case in some constituencies (for example, business) than in others. The crowding of the landscape suggests that any new mechanism may decrease cohesion, increase fragmentation and increase confusion around stakeholders’ impact on nutrition unless sufficiently grounded and properly designed to fill existing gaps. Due to the size of the landscape, the WG has focused on the following as key tools for different stakeholders: Donors, National Governments, Businesses, CSOs, Philanthropies.

Discussions highlighted the following areas for action:

01 Coordination

Multiple partners have stressed the need to not create more frameworks but, instead, focus on the coordination of existing mechanisms. The current landscape can be seen as confusing as well as multiple channels existing for reporting. Some have spoken of ‘reporting fatigue’, and it is thought that adding extra layers would exaggerate this problem, negatively impacting on the effectiveness of tracking 2021 commitments. Further, it has been noted that with similar mechanisms analysing similar data, those making disbursements from across the different constituencies may be having similar demands made of them, representing an approach which is not streamlined and further consolidating reporting fatigue. Compounded by a seemingly crowded landscape, this could have served toheighten demand on those making disbursements without increasing the quality of reporting. The comparison spreadsheet (still being finalised) should serve as a summary of where the focus mechanisms are seeking data and analysis from, but it has been suggested on occasion that communication between the various mechanisms could be improved in order to improve the various final products through more targeted, less-demanding reporting which approaches accountability in a more cohesive manner.

As well as reporting fatigue, the confusing nature of the landscape creates gaps within monitoring and reporting, which impacts on the ability to review progress. There is not one mechanism which will be equally able to fill this gap whilst simultaneously recognising the required nuances between financial and policy tracking, or even the constituency differences. All commitments need clear entry points into a system which monitors, reports and then reviews, yet those entry points may not be easily understandable or available or, on the converse, may be too frequent. Despite this need, the solution may have resource implications likely to fall upon those making financial commitments at N4G 2021. Any changes to the system need the widest possible buy-in, and the costing of any policy solutions, therefore, is an issue interwoven into their own creation.

02 Different Constituency Issues

If the 2021 summit is to be as successful as the ambition and need in the world requires, then multiple constituencies will need to commit to new actions, including donors, country governments, businesses, CSOs and philanthropic organisations. It is unclear as to the
extent that one mechanism could sufficiently ensure accountability from the variety of stakeholders given the likely variety of pledges. Each constituency has raised different concerns as to the current and future state of play affecting them:

a. CSOs – Feeling of a lack of accountability on them as implementers and a sense that reporting is too time consuming to require a focus. A mechanism for tracking and reviewing CSO pledges is not currently in existence so may need to create or focus on this in any realignment. GNR is tracking CSO disbursements based on N4G 2013 commitments, but CSOs are not being held publicly accountable.

b. Business – Understanding their role within the wider context and motivation for reporting as a return on investment, or otherwise. Views from outside the constituency were ensuring that negative business aspects aren’t masked with nutrition commitments. Business are reporting fatigue, too, because there are very different issues on the Sustainable Development Goals (SDGs) for their reporting. The hours taken to report is very consuming. The need to have fair accountability mechanism(s) which go beyond the impact of just a handful of multinational companies.

c. Donors – Challenges surround the reason to report and the limited enthusiasm and reporting fatigue due to wide-ranging reporting across different formats whilst, simultaneously, other constituencies sensing that accountability so far has been donor dominated. Key questions surround the future direction of donor support, with apparent shifts towards partnership approaches which may necessitate different ways of data gathering.

All constituencies commented on the need to avoid duplication and for clearer and simpler processes. With reference to the diagram above, the need for different monitoring and reporting for different constituencies can be overcome with a focused and consolidated review mechanism which can bring together the different processes.

03 Accountability and Pledge Together

Constituencies shared that 2013 saw pledges with accountability as an afterthought and that the voluntary tracking put in does not inspire motivation. This has brought low response rates as accountability has not been considered part of the pledge but as add-on. A shift is needed to both create motivation to report and to place accountability at the heart of the 2021 process. A shift is also needed to overcome any vague or repackaged pledges.

04 Impact and Investment

Much accountability of financing disbursements, particularly donor disbursements, focuses on the disbursements themselves rather than the impact of the disbursement. With reference to the diagram above, this means a stronger focus on monitoring and reporting than on review. Due to the constraints of data collection, which may be over-complicated and seeing replicated processes, analysis on impact of financing flows may not be as at the forefront as possible. This could be driving low motivation to report, particularly for donors,
whose self-promotion is stronger with impact figures than output figures. A shift here could overcome some of the issues raised in section 2. However, ‘impact’ is difficult to see in the short-term, particularly with some nutrition indicators such as stunting. Compared to annual and quantifiable investments, impacts are longer-term and not necessarily easily correlated to investments. There is a need to retain a focus on the investment whilst overcoming the issues around impact. Too strong a focus on outcomes can create extra work and confusion that has been highlighted in issue 1 on coordination; this is something that needs addressing. A drive to review investments against proximal outcomes, especially in the case of non-financial pledges, could fill this gap.