

The Epistemic Problem: Potential Solutions¹

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1: INTRODUCTION

Those of us who live in developed countries frequently receive appeals for funds and other forms of support from aid agencies such as Oxfam, World Vision, and CARE.²

How should we respond to such appeals? Should we give to such agencies?

Presumably, the answer to this question depends on how good or bad the effects of their work are.³ If those effects are as positive as the fundraising literature of such agencies tends to suggest, then there would be a very strong case for saying that we should give to them. If such agencies do less good, and more harm, than they like to imply though, the case for giving to them would presumably be weaker. And if the effects of their work were bad enough, that case might break down altogether.

¹ An earlier draft of this paper was discussed at the workshop which led to this book, *Ethical Questions for International NGOs*. I would like to thank the participants at that workshop for their comments on that draft, especially Chris Roche, who also gave me extensive written comments. Thanks also to Emma Rooksby and Leif Wenar for their comments on that draft. All remaining errors and shortcomings are of course entirely my own responsibility.

² In this paper, 'aid agencies' refers to non-governmental organisations (NGOs) working in the fields of international relief and development. I shall also sometimes refer to them simply as 'NGOs'.

³ It does so unless there is some conclusive reason why it would not be the case that we should give to aid agencies even if the effects of their work were as positive as they could be. This paper is addressed to those who do not think there is such a reason.

If this is right, then it is an urgent matter to try to find out good or bad the effects are;⁴ for until we do so, we will not know whether or not we should give to such agencies. And this is morally troubling, especially as this is one of those cases in which we must respond in one way or another (counting not giving as itself a type of response). Of course, it would be unrealistic to expect any very precise judgement about this matter. International aid is a complex business, and any judgements about the effects are therefore likely to have to be very rough and probabilistic. And for the same reason it would also be unrealistic to expect anything approaching certainty that any such estimate is correct. If we literally had no idea at all about how good or bad the effects were, though, then we would also have no idea about whether we should give to such agencies, given that the answer to the second question depends on the answer to the first. In order to make a minimally well-informed decision about whether or not to give to aid agencies then, we do need to form at least some sort of rough estimate about the effects that we have at least some good reason to believe accurate.⁵

Unfortunately, though, it is very difficult for those of us who are not experts on international aid to know what to think about this matter. I call this the ‘Epistemic Problem’,⁶ and argue in section 3 that it has certain unfortunate consequences. Accordingly, in section 4, I consider what might be done to reduce the size of that problem – to make it easier, that is, for those of us who are not experts on aid to form judgements about the effects that we have more reason to be confident about.

⁴ ‘The effects’, henceforth, is my shorthand for ‘the effects of the work aid agencies do’.

⁵ For ease of exposition, I shall continue sometimes to write about ‘finding out good or bad the effects are’, but that phrase should be interpreted with the points just made in mind; that is, as shorthand for ‘arriving at an estimate about the effects that one has at least some good reason to believe correct’.

⁶ Compare Wenar 2007, p.270-1.

First, though, I will say something to support the claim that it is very difficult for us to form such judgements.⁷

2: THE EPISTEMIC PROBLEM

2.1: The lack of reliable data and expert guidance

What might enable us to reach judgements about the effects that we have good reason to believe accurate?⁸ Two sources of information would appear to be particularly helpful: first, evaluations or assessments of the activities aid agencies perform that attempt to measure at least their more significant effects and second, judgements or estimates concerning the effects by independent experts in the field. Best of all would be a combination of these two sources of information: an impartial assessment of the typical effects of the different kinds of work that aid agencies do, by a set of experts, making use of all the available evaluations, and filling in with informed guesses where such data is lacking.

If such an assessment existed, based on sufficiently robust data, then it would not be difficult for us to reach judgements about the effects that we had good reason to believe accurate, for we could do so simply by accepting that assessment. Of course, there would be no guarantee that that assessment would be correct. In the real world, there is always the possibility of error, particularly with regard to messy questions like those concerning the effects of aid. But we could not do better than relying on such an

⁷ Those who are already convinced of this claim may skip section 2 and go straight to section 3.

⁸ Henceforth, when I use the terms 'us' or 'we' I will mean people living in developed countries who have no special expertise in international aid.

assessment. And as long as it were based on sufficiently good evidence, we would have all the reason for confidence that it is reasonable to expect.

Unfortunately, though, no such assessment is available. Indeed, there is surprisingly little of both of the sources of information just mentioned. To take evaluations first, aid agencies themselves tend not to publish evaluations of their own activities, or indeed any other reliable data on their own work.⁹ And there is no independent body charged with evaluating the activities of aid agencies and reporting back to the public on their findings. As a result, there is surprisingly little data on the effects of the work aid agencies do available to the public.¹⁰

Furthermore, many of the evaluations of the work that aid agencies do that *have* been done – whether publicly available or not – are by all accounts of very poor quality. To quote from the most comprehensive review of evaluations of NGO projects that has been conducted to date (Kruse et al. 1997, 9.4):¹¹

⁹ As Michael Edwards and David Hulme (1996b, p.6) put it, ‘Internal evaluations are rarely released, and what *is* released comes closer to propaganda than rigorous assessment’. Cf. Fowler 2000, pp.13-14, Riddell 2007, pp.267-268.

¹⁰ Much of the data on the work NGOs do that is publicly available has emerged indirectly, as a result of the fact that around the 1980s many ‘official’ (that is, governmental) development agencies started to channel more of their aid through NGOs. These official agencies conducted evaluations of some of this work, and some then went on to compile and publish omnibus reports based on these evaluations. This constituted almost the first data of any kind on the work NGOs do available to the general public. See, for example, Riddell et al. 1994, Kershaw 1995, and Tvedt 1995. See also OECD 1992; Riddell et al. 1995, ODI 1996, and Oakley 1999.

¹¹ This was a study commissioned by the Development Assistance Committee (DAC) of the Organisation for Economic Cooperation and Development, which drew on much of the data on NGO development work then available. This work – the ‘DAC Study’ – was published in 1997, but there has been no further attempt at such a wide-ranging review since then.

a repeated and consistent conclusion drawn across countries and in relation to all clusters of studies is that the data are exceptionally poor. There is a paucity of data and information from which to draw conclusions about the impact of projects, about efficiency and effectiveness, about sustainability, the gender and environmental impact of projects and their contribution to strengthening democratic forces, institutions and organizations and building civil society. There is even less firm data with which to assess the impact of NGO development interventions beyond discrete projects . . .

The data available, then, is disappointing in terms of both quantity and quality. In this context, the role of experts becomes especially important. For given the lack of reliable data, the best hope of reliable estimates about the effects would appear to come from such experts – academics, consultants, and others who spend their working lives studying NGOs and their activities. Unfortunately, though, the experts seem unwilling to offer such estimates. Some do address the question of how good or bad the effects are. Those who do so tend to focus mainly on emphasising the lack of reliable data, though. They don't then go on to ask the next question: '*Given* this lack of reliable data, what is the most reasonable assumption to make about the effects?'¹²

More broadly, specialists on NGO aid have provided surprisingly little guidance to the general public about aid agencies and the work they do. The oddity of this situation is sometimes remarked on by such experts themselves. In 1996, for example, Alan Fowler and Kees Biekart wrote that 'a consumer's guide to agencies, produced by an independent entity, is long overdue' (Fowler & Biekart 1996, p.131). Absent such a guide, they continued, one is left with 'a bizarre situation of agencies competing in a

¹² See for example Fowler & Biekart 1996, Biekart 1999, Smillie 1999, and Fowler 2000. See also 4.5 below.

donor market-place where buyers cannot reasonably compare the products on offer or their relative value for money; they must still choose by an act of faith' (ibid.). In the intervening years, however, the situation has not substantially changed.¹³

2.2: Does one really need such data or guidance?

Those seeking to find out how good or bad the effects are cannot do so, then, simply by turning to a reliable supply of data or to the judgements of experts in the field. One might question whether such data or guidance is necessary, though. For there are a number of strong reasons for thinking the effects are easily good enough to imply that we should give which do not depend on such data or guidance.¹⁴ Given that many of the people aid agencies work with lack even basic goods and services, for one thing, it seems clear that such agencies are in a position to do a huge amount of good for very little money. And this impression is reinforced by the information such agencies supply, which often states or implies that even very small sums of money can produce great benefits, such as saving lives. Such familiar considerations, one might suggest, give us all the reason we need to believe that the effects are good enough, despite the lack of

¹³ Perhaps the most significant addition to the literature is a recent book by Roger Riddell (2007, chs. 16-19), which includes an extensive review of available information about the work NGOs do. This is the most authoritative work of its kind yet produced, and consequently I draw on it extensively in what follows. Nevertheless, it too conforms to the tendency described at the end of the previous paragraph in the main text.

¹⁴ This way of putting it leaves open a major normative question, concerning how good those effects have to be in order to imply that we should give. This question is controversial, and I won't try to settle it here. To say that the effects are 'easily' good enough, though, I shall take it, is to say that they are so good that they will meet any reasonable standard concerning how good those effects need to be in order to imply that we should give.

supporting data and expert assurance.¹⁵ And if that is correct, then it would not be difficult to arrive at a judgement about the effects that one had sufficient reason to believe accurate after all. All that would be necessary is to think through the implications of the kinds of familiar considerations just cited.

Are such considerations strong enough to give us sufficient reason to assume that the effects are good enough, though? They would be, I think, if there were no other factors which provided significant reasons to doubt that assumption. If one turns to the literature on aid agencies that has emerged in the last twenty years or so, however, one finds a number of concerns about aid agencies and their work that do, in my view, provide such reasons.¹⁶ And consequently, it seems to me that one cannot simply assume that the effects are good enough on the basis of the kinds of everyday considerations just sketched.

This part of my argument presents me with a major expository problem. To get an adequate sense of the kinds of concerns I have in mind one has to engage with the literature in question; any short summary is bound to be insufficient. On the other hand though, it does not seem satisfactory merely to assert that there are concerns significant enough to put the presumption that the effects are easily good enough in serious doubt without giving any indication of what those concerns are. In response, I do offer a relatively short summary of such concerns, while emphasising that it is sketchy,

¹⁵ When I write about whether the effects of the work aid agencies do are ‘good enough’, henceforth, I mean whether those effects are good enough to imply that we should give to them.

¹⁶ There has always been a significant critical literature on ‘official’ aid (aid given by governments), but a literature on NGOs that includes frank discussion of problems with their work has emerged more recently. Influential early pieces of this kind include Tandler 1982, Korten 1987 and 1990, and Clark 1991. For more references, see 2.3 and 2.4.

incomplete, and much simplified, and providing references to the literature for those who want to find out more.¹⁷

(I should perhaps also emphasise that what follows is a sketch of some of the *concerns* about aid agencies and their work that are raised most often in the literature, rather than a balanced summary of both positive and negative comments. I focus on such concerns because, as I have just said, I think that there are very strong reasons to assume that the effects are easily good enough, and that if one could simply make that assumption there would not be any significant Epistemic Problem. In order to support my claim that there is such a problem, then, I need to show that there are significant reasons to doubt that assumption. And in order to do this, I need to show that there are sufficiently serious concerns about aid agencies and the work they do. This, then, is why I focus in what follows on concerns about aid agencies, rather than seeking to give a balanced summary.¹⁸)

2.3: Concerns about the effects of the work aid agencies do

Aid agencies do a variety of different kinds of work. The most basic distinction commonly made is between humanitarian aid, which is given in response to disasters and emergencies, and development aid, which is given in other circumstances.¹⁹ The

¹⁷ Many of the pieces I cite are surveys of one sort or another; as such, most contain more detailed references.

¹⁸ Of course, if such a summary would make it easy to see that the effects were good enough, then again there would be no Epistemic Problem. Unfortunately, though, I do not think such a summary would do so; see 2.5.

¹⁹ Development aid is often described as aid that aims at long-term solutions to the problems of poverty and deprivation, rather than short-term relief. Given that development aid is also standardly taken to include all aid that is not given in response to emergencies, the apparent implication is that all aid that is

greater part of NGO aid is development aid, and the greater part of NGO development aid, in turn, involves ‘the support or implementation of specific projects and programmes for particular groups of (poor) people and (poor) communities’ (Riddell 2007, p.262).

Such projects and programmes fall into several categories. One is ‘service delivery’ – the provision of basic goods and services to meet immediate needs for food, health, housing, water, education, and so on. It was projects of this kind that aid agencies first focused on when they began working in developing countries on a significant scale in the 1950s.²⁰ Initially, the hope was that such support would only be necessary for a while, after which the recipients would be able to meet their own needs. In many cases though, that was not how things turned out. As a result, the concern grew that communities that received aid would be locked into an unending cycle of dependency on foreign agencies.

Worse, many began to suspect that such forms of aid were actually undermining the forces necessary to put the poor in a position to meet their own needs. Such concerns manifested themselves at a number of different levels. At the economic level, supplying certain cheap or free foreign goods can depress the prices that local producers

not given in response to emergencies aims at long-term solutions. By all accounts, however, that implication would be false: some aid that is given in non-emergency situations aims primarily to meet immediate needs, rather than to provide long-term solutions. Therefore, it seems less misleading to characterise development aid simply as aid given in non-emergency situations.

²⁰ The following combined historical sketch, taxonomy, and summary of some of the problems with development aid draws especially on Korten 1990, Clark 1991, Smillie 1995 and 1999, Biekart 1999, Fowler 2000, and Riddell 2007, chs 16-17.

of such goods are able to charge, and thus undermine local production.²¹ At the institutional level, the intervention of relatively well-resourced foreign NGOs can impede the development of local self-help organisations. And at the political level, the provision of basic services by foreign NGOs can enable government authorities to divert funds that they might have used on such services to other, less salubrious purposes. It can also appease the poor, and thus reduce their motivation to pressurise authorities for change (Lappe & Collins 1988, pp.93-4, Fowler & Biekart 1996, pp.126-8, Biekart 1999, pp.121-2).

In part in response to such concerns, some agencies began to supplement or replace service delivery with other kinds of aid. One category consists of activities aimed at enhancing the income-generating capacities of individuals and communities, often by teaching new skills or introducing new technology. This is the kind of aid associated with the famous Chinese proverb, 'Give a man a fish and you feed him for a day; teach him to fish and you feed him for life'. The logic of such a development is clear, but the results appear to have been disappointing. According to the authors of the DAC Study (see 2.1), 'INGO interventions are more successful when focusing on social service provision and least successful when attempting to promote economic and more productive-type projects' (Kruse et al.2000, 4.2). Indeed, they report that 'there would appear to be unanimity among all the reports which address this issue that whatever good individual projects do, they are insufficient to enable the beneficiaries to escape from poverty' (3.3.3).

²¹ The best-known example is food aid, though it should be said that official aid agencies (particularly USAID), rather than NGOs, have been the main force behind such aid. Similar problems have arisen in connection with the transfer of other products by NGOs, however, such as the provision of second-hand clothing, which tends to undermine local producers and tailors (Fowler & Biekart 1996, p.123).

Why such disappointing results? A variety of factors are often cited, many of which concern features of the local social and political context. As David Korten (1990, p.120) puts it, with reference to the Chinese proverb:

The NGOs are prone to point out that villagers who live near the water already know a great deal more about fishing than do the city kids that NGOs send out as community organizers. The more substantial need is to insure the access of the poor to the fishing grounds and markets that local elites control.²²

Accordingly, some NGOs began to develop strategies aimed at increasing the capacity of poor and marginalised people to fight for their rights, such as supporting ‘Southern’ NGOs and community based organisations in developing countries. The lack of reliable data on the effects of such ‘capacity-building’ work, however, is especially acute. According to Riddell (2007, p.283), ‘of all the different ways that NGO aid is allocated and spent, least is known about the overall impact of capacity-building initiatives’. Indeed, he continues, it ‘is extremely rare for NGOs separately to assess even the direct impact of such activities, never mind the wider effects on the lives of beneficiaries’ (ibid.).

It is not clear, then, how often such capacity-building initiatives achieve positive effects. We do know, however, that such work can do harm as well as good. Funding local organisations can induce leaders to orient themselves more to those who supply the funds than to their members, for example, and provide opportunities for

²² Compare Black 2002, p.112, and Kremer & Miguel 2004, p.3.

corruption.²³ And the risks involved in more confrontational political work will be obvious enough. According to Ian Smillie (1995, p.232), ‘Some NGOs have taken terrible risks in the name of democracy and human rights. Workers have died or been jailed, organizations have been crushed, lives ruined’.²⁴

The record on of development projects, then, is unclear. The pervasive sense in the literature, though, tends to be one of disappointment and frustration at best.²⁵ The following is, I think, a fairly representative summing up of the general mood (Black 2002, p.37):

Anyone who has spent time on aid-financed projects knows that the process of intervening usefully in how people conduct their lives is fraught with difficulty. It is hard enough in one’s own community; how much harder in societies with quite different political, economic, social and cultural dynamics. Neat constructs of success

²³ Burnell (1991, p.107) quotes from the 4th edition of the Oxfam *Field Directors’ Handbook*: ‘many small groups have been destroyed by excessive funds’. See also Burnell 1991, p.175, Smillie 1995, ch. 10, Biekart 1999: 298-9, and Fowler 2000, pp.26-8.

²⁴ On the other hand, International NGOs are also sometimes accused of emasculating local organisations, turning them from political movements into mere providers of services; see e.g. Arellano-López & Petras 1994, Sogge 2002, p.180.

²⁵ ‘At best’, because there is a vein in the literature that is much more negative about aid (including aid given by NGOs) than most of the authors I cite here. Examples include Maren (1997) and much of the ‘post-development’ school (see e.g. Sachs 1991, Escobar 1994, and Rahnema & Bawtree 1997). These authors take such a one-sided, polemical line that it seems highly questionable whether they are reliable sources, however, and consequently I do not rely on their work here. Most of the authors I do draw on (such as Alan Fowler, Ian Smillie, Kees Biekhart, Michael Edwards, and Roger Riddell), by contrast, are sympathetic to NGOs and their aims, which of course makes the concerns they raise harder to discount.

and failure – which aid organizations dependent on support in donor countries are guilty of perpetrating – rarely apply.

Indeed, some have come to believe that, as Michael Edwards and David Hulme (1992, p.14) put it, ‘small-scale NGO projects *by themselves* will never be enough to secure lasting improvements in the lives of poor people’ (emphasis in original). This is because the context in which such projects operate are shaped by unsupportive policies and institutions at the national, regional, and global scale. This kind of diagnosis has led some NGOs to develop activities aimed at changing such policies and institutions, such as building up networks of local organisations in developing countries, and advocacy, lobbying, and campaigning on issues such as trade and debt in developed countries.

Aid agencies are more often praised than criticised for such ‘beyond-the-project’ work, though once again it is unclear how much impact it has.²⁶ In any case, though, few agencies apparently devote a large proportion of their budget to such activities at the more structural end of the scale. According to Alan Fowler, for example (2000, chs.19, 18):

There is scant evidence to suggest that *the bulk* of NGDOs have substantially shifted their operations towards redressing the structural or root causes of poverty and insecurity. . . . Delivery of technical, social, and, increasingly, micro-financial services . . . still forms the primary weight of NGDO activity.²⁷

²⁶ See Riddell 2007, pp.288-98 for a review.

²⁷ NGDO stands for ‘non-governmental development organisation’. Similarly, Riddell writes that ‘only a small proportion of aid (usually less than 20% for large NGOs) is used to address human suffering and to tackle extreme poverty indirectly. The overwhelming majority of aid funds donated is channeled directly to particular groups of poor people, mostly on the basis of need’ (Riddell 2007, pp.158).

Finally, a word on humanitarian aid: again, NGOs are often praised for their contribution to such work, and there is no doubt that it saves many lives. Again, though, experience has also shown that such work can lead to significant negative effects, especially in conditions of conflict.²⁸ Thus one problem concerns the leakage of supplies. Agencies are sometimes forced to pay protection ‘taxes’ to get supplies through to those who need it, for example. Or supplies may simply be looted. If so, those supplies may then be sold or exchanged for arms. And in this way, attempts to provide relief can help to fuel the very conflict they are a response to.²⁹ Even when supplies do get through, moreover, there can be similar unintended negative effects. Resources that warring parties might have spent looking after their civilian population will be freed up for military use, for example, if the international community takes care of that population. And armed factions can use refugee camps as bases from which to prepare future attacks, as happened around Cambodia in 1979 and around Rwanda in 1994.³⁰

Many commentators have argued that relief aid also tends to foster the kinds of more long term and systemic negative effects associated with service delivery, such as dependency, disincentives to local production, and the undermining of local self-help

²⁸ For brief reviews of this area, see Collins 1998; Edwards 1999, ch.5; Weiss 1999; Lindenberg & Bryant 2001, ch.3; Addison 2000, and Riddell 2007, chs 18-19. For longer studies, see de Waal 1997 and Terry 2003.

²⁹ ‘In 1996,’ writes Tony Addison (2000, p.394), for example, ‘Liberia’s warlords looted over \$8 million worth of relief supplies, much of which found military use’.

³⁰ According to Alex de Waal (1977, p.78), aid delivered to refugees and fugitives in Thailand in 1979 ‘provisioned the defeated army of the Khmer Rouge and allowed it to remobilize’. For the Rwandan case, see Millwood 1996, de Waal 1997, ch. 9 and Terry 2002, ch. 5.

organisations. More broadly, some critics have argued that the provision of relief tends to undermine the development of the kinds of local social and political arrangements that are necessary to provide secure, long-term solutions (de Waal 1997).

2.4: Concerns about aid agencies as organisations

The concerns just sketched are discouraging, but shouldn't of course be blown out of proportion. It is one thing to say that NGO aid *can* have serious negative effects, for one thing, and another to say that it often or typically does. And the lack of evidence of success is not in itself evidence of failure. The kinds of concerns just sketched do nevertheless provide reasons to think that aid agencies may need to be highly capable, well-organised, and well-focused to find out which activities have the best effects and ensure that those activities are executed effectively.

Do NGOs have these qualities? Again, it is hard to judge, for even less attention has been given to the evaluation of NGOs as organisations than to the evaluation of their activities,³¹ and to my knowledge none of the evaluations that have been conducted are available publicly.³² There has been quite a lot of discussion of such

³¹ See Fowler 2000, 14. NGOs that wish to join the relevant NGO umbrella group in their country (such as ACFID in Australia, BOND in the UK, and InterAction in the USA) have to go through an accreditation process in order to do so, as do NGOs that wish to be eligible for money from governmental sources. One can deduce, then, that NGOs that are members of such groups or receive money from governments have met certain standards. How much reassurance one can take from this depends of course on how stringent those standards are, and as usual it is not easy for non-experts to know what to think about this (though I am told that the AusAID accreditation process is pretty onerous – see <http://www.ausaid.gov.au/ngos/accreditation.cfm>).

³² There are a number of organisations (such as Guidestar) that aim to provide information to those who are thinking of funding NGOs, but the information they provide tends to be limited to the kind of thing

issues by aid specialists, however. Rather than providing reassurance, though, this literature highlights a number of further concerns.

Thus one common complaint concerns the lack of attention that NGOs tend to give to evaluating their own activities, and more broadly to learning and research (Smillie 1999, pp.21-31, Riddell 1999, Davies 2001, and Riddell 2007, pp.265f).

According to Ian Smillie (1999, pp. 30-1), for example:

. . . many NGOs themselves believe that training, evaluation, research and publications are luxuries. . . . Too busy ‘getting the job done’, many have sacrificed corporate memory and learning to the exigencies of time and place.

This raises some awkward questions. If NGOs do so little rigorous evaluation,³³ how do *they* know what the effects of their activities are? And if they do not know what the effects of their activities are, how can they ensure that they focus on the activities that have the best effects?

Of course, evaluations and other forms of research cost money, and it will always be difficult to spend money on research that could be spent directly on aid activities. Given the risks of aid, however, the failure to conduct sufficient research may be a false economy. And in any case, many commentators claim that such tendencies are not due solely to considerations of cost. As Michael Edwards (1999, p.211) puts it,

one would find in such NGOs’ annual reports. None, to my knowledge, conducts rigorous evaluations of NGOs or their work.

³³ It is important to emphasise *rigorous* evaluation because the term ‘evaluation’ is used to refer to a number of different kinds of activity, only some of which provide reliable information about the effects. On these issues, see for example Cracknell 2000, esp. ch. 3.

for example, 'Development agencies often have an activist culture which sees learning as a luxury when compared with the 'real work' of operations'.

Another common complaint concerns organisational and managerial problems. As Chris Roche puts it (1999, p.274):

Development agencies, including large NGOs, are not immune from the problems confronting other bureaucracies in terms of complacency, hierarchy, inertia, and poor information flow, which can lead to loops of self-deception as feedback from activities is distorted, or manipulated as individuals seek to protect themselves. Senior managers who subscribe to the view that 'if it ain't broke, don't fix it' will tend to go along with positive news and carry on without checks until something 'breaks'. As Robert Chambers has suggested, this kind of institutional blindness has led to the most remarkable feature of development efforts over the last few decades: that 'we' were so wrong when 'we' thought that we were so right (Chambers 1994).

Given the lack of probative data available on such agencies, it is hard to say how widespread these tendencies are. One of the tendencies for which NGOs are most often criticised is the failure to learn from experience, and the consequent tendency to repeat the same errors again and again. In a set of recent evaluations of the response to the 2004 Indian Ocean tsunami, for example, there is, to quote from Riddell (2007, p.346), 'some extremely strong criticism, not only of inefficiencies and mistakes, but of the repetition of mistakes made in earlier disasters, the lessons of which do not appear to have been learnt, or acted upon effectively' (see also Edwards 1999 pp.82-5; Minear 2002, pp.46f; and Terry 2003, pp.224f.).

Given such problems – the neglect of rigorous evaluations, a culture that downgrades learning, 'institutional blindness', the failure to learn from experience and

correct mistakes, all on top of the fact that aid is a difficult business and much can go wrong – it no longer seems quite so straightforward to assume that NGOs will find out which activities have the best effects and execute them effectively. As an outsider, it is of course hard to know what to think about such matters, but it has to be said that some apparently fair-minded commentators issue some pretty damning verdicts. Here is one example (Fowler & Biekart 1996, p.122):

Development, again, is not easy – why should it be? But professional, competent agencies will surely have got this right after so many years of trying without evaluators having to tell them what development criteria are? The truth is that, despite strong personal commitment of staff, most agencies are not that professional or competent. They are just not found out.

Many commentators also accuse NGOs of a growing tendency to give more attention to institutional ends (such as increasing ‘market share’) than to developmental ends (such as alleviating poverty) (Edwards 1996, Biekart 1999, p.77-92, Dichter 2003, ch. 6; cf. de Waal 1997, p.66). Given the lack of reliable information on the work aid agencies do, an agency’s ability to raise funds is likely to depend less on how effective it is than on such factors as maintaining a good reputation, keeping up its public profile, and putting across a message that is attractive to potential contributors. And this can lead to several negative tendencies. For one thing, such pressures can distort what activities NGOs focus on. Agencies may focus on activities that attract the most publicity, for example, or that are especially appealing to contributors, even if those are not the activities that would do the most good. And indeed, many commentators complain of a tendency for NGOs to make sure they have a presence in places where

they are most likely to get media attention, such as well-publicised disasters, whether or not that is the best use of their resources (Rieff 1995: p.7, De Waal 1997, p.80, Vaux 2001, pp.29-30).

Again, it should be acknowledged that aid agencies are in a difficult situation. They need to appeal to a fickle public for funds and other forms of support,³⁴ and so it will be tempting to make certain compromises. Further, any losses resulting from such self-publicising measures might be more than made up if those measures lead to increased donations. To the extent that different agencies are merely competing with one another for the same funds, however, the result will merely be that less scrupulous agencies outcompete more scrupulous ones.³⁵ And the competitive ethos that results appears to reinforce a number of other negative tendencies that are often discussed in the literature, such as the failure of different agencies to cooperate with one another or coordinate their activities, even when doing so would promote their shared ends (Clark 1991, p.65, Smillie 1995, p.233, Edwards 1999, p.105, Biekart 1999, p.299, Lindenberg & Bryant 2001, pp.75-6, Minear 2002, ch. 2, and Riddell 2007, pp.338-9).

Such institutional and motivational problems are reinforced, moreover, by the fact that many agencies have switched from devising, running, and staffing their own activities to working with and through local organisations in developing countries. As a

³⁴ In recent years, many NGOs have received an increasing share of their income from governments. Doing so avoids some of the problems involved in raising funds from the general public, but gives rise to new dangers of its own. Competing for government funds can lead agencies to censor any criticisms they have of government policies, for example, and working for governments can lead them to lose their distinctive ethos and become more like government contractors. For discussion of these issues, see Hulme & Edwards 1997.

³⁵ See de Waal 1997, pp.138-9 and Pogge 2007, pp.241-5. See also Cullity and the Afterword in this volume for more discussion of such collective action problems NGOs face.

consequence, there is often a whole chain of different organisations involved in any particular project. And this provides further opportunities for institutional and personal pressures to create mischief. As Stuart Carr (1998, p.49) and his colleagues put it:

the explicit agenda at each point may be that of poverty alleviation, but . . . more ‘personal’ agendas such as the organization’s survival or an individual’s desire for promotion can take precedence at any particular point in the chain.

Again, it is hard for outsiders to judge how widespread and severe such institutional problems are. But again, some apparently reliable commentators make some worrying claims. David Hulme and Michael Edwards (1997, p.282), for example, write that ‘the focus of attention has shifted away from empowering others, for independent action, towards empowering NGO leaderships and serving the organisation and its own ends’.

2.5: Taking Stock

The material summarised in 2.3 and 2.4 makes pretty grim reading. With that in mind, it is important to emphasise the context. My main aim in this section is to support the claim that it is very difficult for those of us who are not experts on international aid to arrive at a judgement about the effects of the work aid agencies do that we have good reason to believe correct. In 2.1, I suggested that this claim would be false if an impartial assessment of the effects were available, made by independent experts and based on robust data. For in that case one could arrive at a suitable judgement about the effects simply by accepting that assessment. Unfortunately, though, no such assessment is available.

In 2.2, I turned to another factor that might make the claim that it is very difficult to arrive at such a judgement false. I pointed out that there are a number of familiar, everyday considerations that give one strong reasons to assume that the effects are easily good enough – so strong, I suggested, that it would be reasonable simply to make that assumption if there were no other factors which provided significant reasons to doubt it. And if that were so, then again it would not be difficult to arrive at a judgement about the effects that one had sufficient reason to believe accurate, for it is not difficult to follow such an argument.

I then claimed, however, that the literature on NGOs reveals concerns that do provide significant reasons to doubt that assumption. The material in 2.3 and 2.4 constitutes my summary of those concerns. If such concerns *do* provide significant reasons to doubt that the effects are good enough, then one cannot after all simply make that assumption on the basis of the kinds of everyday considerations sketched in 2.2. It doesn't follow, of course, that that assumption is *false*. In order to assess any such substantive claim, one would need to consider what might be said in response to those concerns. Given that here I have focused exclusively on the negative side, moreover, I would like to emphasise that there are a number of forceful responses that one might appeal to.³⁶ I do not know of any such response that provides a quick, decisive argument that the effects are good enough, however. Instead, those who seek to find out how good or bad the effects have to try to weigh up a complex variety of positive and negative considerations.³⁷ This is a very difficult task, especially given the lack of

³⁶ I discuss such responses in Horton 2009.

³⁷ In Horton (unpublished manuscript), I discuss in some detail the various measures non-experts may take in an effort to find out how good or bad the effects are.

reliable data and expert guidance. And that, to repeat, is the claim that I was seeking to support in this section.

3: WHY THE EPISTEMIC PROBLEM IS A PROBLEM

I shall take it, then, that it is indeed very difficult for those of us who are not experts on international aid to find out if the effects are good enough to imply that we should give to them. And as I said in section 1, I am calling the fact that it is so difficult for us to do so the ‘Epistemic Problem’. Why call this fact a *problem*? In part, because it follows that it is also difficult for us to determine whether or not we should give to such agencies. For if it is difficult for us to find out whether the effects are good enough to imply that we should give to aid agencies, then of course it will also be difficult for us to determine whether or not we should give to such agencies.

Might one question the assumption that we need to find out how good or bad the effects are in order to determine whether we should give? Not really. As I said in section 1, whether or not we should give to aid agencies clearly depends on how good or bad the effects of their work are. This is easiest to see if one focuses on the worst-case scenario – that aid agencies do more harm than good. For surely it would not be the case that we should give to them if this were so. The effects must have to come up to some standard, then, in order for it to be the case that we should give. There are likely to be different opinions about what that standard is, and as I said above I will leave that question open here. Whatever that standard is, though, if we unable to find out whether the effects meet it, we will also be unable to find out whether we should give.³⁸

³⁸ As I also said above, it would be unrealistic either to expect any very precise judgement about this matter, or to expect anything approaching certainty that any such judgement is correct. This shows only

The fact that it is difficult for us to find out whether the effects are good enough, then, means that it is also difficult for us to determine whether we should give to such agencies. And this is awkward, given that none of us can avoid the choice of whether to give to such agencies or not. Of course, to say that it is *difficult* to find out whether the effects are good enough is not to say that it is *impossible* to do so. The more difficult it is to do so, though, the more likely it is that even those who make a serious attempt to do so will fail, and that others will be discouraged from making such an attempt.

As long as it is seriously unclear to us whether the effects are good enough, moreover, we are unlikely to give to such agencies, or at least to give substantially. For in view of the sacrifices that doing so would impose, and the variety of other morally important initiatives that compete with aid agencies for our money, we are likely to hold back unless we are fairly confident that the effects are good enough. Whether this is a good or a bad thing depends, of course, on whether the effects are in fact good enough. If they are not, then it may be no disaster if the difficulty of finding out whether the effects are good enough leads us not to give. If the effects are good enough, though, matters would be much more serious. For in that case, the difficulty of finding out how good the effects are would result in our failing to do what we should do. This would be bad from our point of view, at least if we care about whether or not we do what we should. And it would be bad for the global poor, for it would mean that they would be getting less support than they should be getting.

that any such judgement may have to be rough and far from certain, though, not that we can do without such a judgement at all.

Of course, some people would not give no matter how easy it was to find out that the effects were good enough.³⁹ As long as there are *some* people who would give, or give more, if it were easier to find out that the effects were good enough, though, aid agencies would receive more money if it were easier to find out that the effects were good enough. And it seems hard to deny that there are some people of this sort. The most common reasons people give for not giving to aid agencies, in my experience, tend to be worries of one sort or another about the effects.⁴⁰ In some cases, no doubt, such reasons function merely as an excuse, but it would seem skeptical to the point of cynicism to suggest that that is so in all cases. If it were easier to find out that the effects were good enough, then, it would be easier to see that such worries do not undermine the case for giving. And if it were easier to see this, then some people who currently do not give because of such worries would start to give, or give more.

At the workshop this paper was written for, I should acknowledge, there was quite a lot of skepticism about this claim (that donations to aid agencies would go up if it were easier to find out that the effects were good enough) from people with NGO experience. The general view seemed to be that those who give to NGOs do so mostly for self-regarding reasons – in order to feel good, for example, or to assuage guilt – and that therefore they tend not to be much interested in the effects of the work aid agencies do.⁴¹ I do not think that such suspicions undermine the claim in question, though. For

³⁹ And conversely, some people do give how despite the fact that it is difficult to find out whether the effects are good enough (though few give a substantial proportion of their income). But this is not of course inconsistent with the claim that some people who do not currently give would start to do so if it were easier to find out that the effects were good enough.

⁴⁰ David Crocker (1995) expresses a similar view: ‘what challenges aid to distant peoples is not so much skepticism concerning moral foundations as pessimism about practical results’.

⁴¹ This possibility is also put forward and discussed briefly in Riddell 2007, pp.156-7.

one thing, giving to aid agencies would presumably not make one feel good (or be effective in assuaging guilt) unless one believed that their work had generally good effects. If it were easier to see that this claim were true, then, more people would believe it, and thus more people would be in a position to feel good (or assuage guilt) by giving to such agencies. If it were easier to find out that the effects were good enough, then, it seems likely that more people who are responsive to such motives would give. Even if such motives are very common, moreover, it seems reasonable to suppose that there are nonetheless significant numbers of other potential contributors who are more concerned about the effects, and who would therefore be more likely to give if it were easier to find out that the effects were good enough.⁴²

It seems likely, then, that donations would go up if it were easier to find out that the effects were good enough. And this would benefit the global poor, given the assumption that the effects are good enough, for that assumption would presumably hold only if the effects of the work aid agencies do were at least very good on the whole. Given that assumption, then, the Epistemic Problem is a *very* bad thing indeed, for it would be preventing the global poor from getting the support that they would be getting if it were not so difficult to find out that the effects were good enough.

Is that assumption true, though? Are the effects good enough? As a non-expert it is of course difficult for me to say – that is just one instantiation of the Epistemic

⁴² Opinion polls are regularly conducted on public attitudes to government aid, but the data they provide appears to be somewhat ambiguous. Many polls provide evidence for what I take to be the natural assumption that support for aid would go up if there were more evidence that it was effective. Other polls, however, suggest that many people support aid even though they believe it to be ineffective, which might be taken to imply that people's support for aid is relatively unaffected by how effective they think such aid is. For references and discussion, see Riddell 2007, pp.114-17.

Problem. Though I will not argue the point here, though, I think they probably are.⁴³

And as I have just said, given this assumption, and the assumption that donations would increase if it were easier to find out that the effects are good enough, the Epistemic Problem is a very bad thing. Those who share those assumptions, then, will agree that it is an urgent matter to consider what could be done to make it easier for potential contributors to find out how good or bad the effects are.

What if one does not share one or both of those assumptions, though? Would there then be no strong reason to seek out ways to make it easier to find out how good or bad the effects are? Not necessarily. Whether those assumptions are true or false, doing so would still make it easier for people to find out what they should do, which is a worthwhile goal. Furthermore, doing so may also have good consequences for the global poor, even if the effects are *not* good enough. Consider, in particular, the possibility that the effects are very bad – that such agencies (or a subset of such agencies) do more harm than good, for example. Making it easier for people to find *that* out would also be good for the global poor. For those who currently give to aid agencies would presumably not do so if they knew that such agencies did more harm than good.⁴⁴ If it were easier to find out how bad the effects were, then, at least some of these people

⁴³ Why not argue the point here? In part, because I don't think that I, as a non-expert, should be the one to take on this task. For obvious reasons, experts in the relevant field would be in a better position to do so, and so it is really for them to do so. Now as I noted in 2.1, such experts don't in fact seem willing to take on this task, and in that context it might be necessary for non-experts to step in as best we may. As I said in 2.5, though, I do not think there is any quick, decisive argument that the effects are good enough, and I don't have space for a long and detailed argument here. (I do provide such an argument, however, in Horton 2009.)

⁴⁴ That includes even those who currently give in order to feel good (etc.) for presumably giving would not make one feel good if it were easy to see that aid agencies did more harm than good.

would stop giving, and this would again be good for the global poor, for with less money those agencies would presumably do less harm.

On a number of different assumptions, then, there are strong reasons to see if there are any measures that could be taken that would make it easier for ordinary people to find out if the effects are good enough. In the remainder of this paper, consequently, I discuss a number of potential measures of this kind.

4: POTENTIAL SOLUTIONS

4.1: NGOs could make more data on their own activities available

One thing NGOs could do is to make more evaluations of their own work publicly available, for example by putting them on their websites. Doing so would give potential contributors more information about the activities of such NGOs than they have now, and might also be taken as an encouraging sign of a willingness to be more open about their work. These are important merits. At the same time though, it is not clear whether doing so would help much with the Epistemic Problem. For one thing, such evaluations may not give potential contributors much of an idea about the real impact of the activities evaluated. For they tend to be written for insiders in a style full of technical jargon, and many do not even contain estimates of the effects of the activities evaluated.

One response to these problems would be for NGOs to publish not (only) evaluations themselves, but summaries or interpretations of those evaluations, written in a style accessible to non-experts. Ideally, such summaries would also contain estimates

of at least the more significant effects of the activities in question.⁴⁵ This suggestion highlights another obvious problem, however, concerning whether potential contributors would have sufficient reason to trust any such material NGOs made available, whether evaluations themselves, or interpretations of those evaluations, for NGOs may of course be tempted to select and interpret the available evaluations in ways that give a rosy view of their activities. And it will be hard for outsiders to tell whether or not this has happened if there is no independent body advising them about such matters.

Even if these worries were put aside, moreover, making such material available may still be insufficient to deal with the Epistemic Problem. For what the potential contributor presumably requires, in order to reach a well-informed decision about whether or not to give to a certain NGO, is some idea of the effects of that NGO's activities as a whole, or at least of the typical or average effects of such activities. And it is far from clear whether reading interpretations or summaries of stray evaluations of this or that activity would enable one to form such an idea.

The obvious response to *this* problem would be for the agency, or some other body, to put together a synthesis or meta-evaluation of all of the agency's evaluations, or of a representative sample of those evaluations. Might this be enough to give one a tolerably clear idea of how good or bad the effects are? That would depend on a number of factors. One would be whether the NGO in question conducts or commissions enough evaluations of sufficient quality to enable any such conclusion to be drawn with any confidence. Another would concern the type of activities the NGO in question did.

⁴⁵ Some NGOs have started to publish summaries of evaluations on the websites, though the ones I have seen do not tend to be written in a form that enables one to form a very clear idea about the effects of the relevant activities.

It might be relatively straightforward for agencies that focus on just one type of activity to produce a meaningful synthesis, especially if the activity in question were of a kind that lends itself relatively easily to measurement. It would be much harder for agencies that do a range of different activities, especially if some of those activities are of a kind that is hard to evaluate.⁴⁶ And a third factor would concern the objectivity of such reports, even if they are conducted by independent consultants. (Do critical consultants get invited back?)

For all of these reasons, it is not clear how much impact taking such measures – publishing more evaluations, or summaries and syntheses of evaluations – would have on the Epistemic Problem. There are also a number of reasons why NGOs may have reservations about publishing such information on a significant scale. Doing so would use resources that could be used on aid activities, for one thing. This would be unfortunate in itself, and may also put off those potential contributors who disapprove of spending on ‘overheads’. Of course, if it were merely a matter of publishing or

⁴⁶ This is because of the difficulties involved in aggregating information derived from evaluations of different activities into meaningful overall measures. One common response to this problem is to treat whether activities have met their objectives as a kind of common factor. Unfortunately, though, it is often difficult to know how to interpret such assessments. This problem is illustrated in the nearest thing to such publicly available meta-evaluations that I am aware of, published by CARE on its website (see <http://care.ca/libraries/dme/>). The most recent is ‘The Mega 2002 Evaluation’, based on 65 evaluation reports (Goldenberg 2003). This document says that 82% of those evaluations ‘reported that projects had achieved most of their intermediate objectives’ (p. 5). It is difficult, though, for an outsider to know what to make of this, in part because the report does not explain what is meant by ‘intermediate objectives’. It does contrast ‘intermediate objectives’ with ‘final goals’, though, which presumably are matters of real importance. Unfortunately, though, the report does not give any data (so far as I can see) concerning what proportion of projects achieved their final goals.

interpreting or synthesising evaluations that the agency already had available, then the resources used would presumably be fairly small. If new evaluations had to be commissioned, however, then the exercise could become much more expensive.

Even if the exercise were relatively cheap, moreover, it would nonetheless constitute a salient example of resources not being spent on aid activities, which would not go down well with some contributors.⁴⁷ Unless they were heavily massaged, for example, such evaluations would be likely to reveal more about the negative aspects of aid than many agencies have been ready to admit to publicly up to now,⁴⁸ and NGOs might fear that those negative aspects would loom larger in people's minds than any positive findings.⁴⁹

As a result of these factors, agencies that took such measures might lose out in relation to agencies that did not. The obvious way to prevent such unfortunate consequences is to introduce forms of regulation that give all agencies an effective

⁴⁷ Evidence for this claim may be found in Oxfam GB's 'Stakeholder Surveys Reports', based on responses to questionnaires concerning Oxfam's performance by different groups such as donors, staff, volunteers, and 'beneficiaries'. These reports were set up precisely in an effort to respond to concerns about accountability. But there appears to be little enthusiasm for such initiatives among Oxfam's supporters. In the latest report (2003), for example, only 12% of financial supporters bothered to return the questionnaire, and many who did so expressed the view that the money spent on the survey should instead have been spent directly on projects (Oxfam 2003, 5, 35).

⁴⁸ According to Riddell (2007, p.268), 'There are only a handful of NGOs today which put information into the public domain which draws attention to failures and problems as well as successes'.

⁴⁹ It is a further question how well-grounded such fears would be. If the figures cited by Riddell apparently showing that many people are happy to fund aid even though they believe it to be ineffective are reliable (see n. 42 above), it might be that NGOs would have little to fear from revealing more about the negative aspects of aid.

motive to follow the same measures.⁵⁰ Though this may prevent opportunistic agencies from profiting at the expense of their more scrupulous fellows, however, there remains the danger that *all* agencies, or aid agencies taken as a whole, might receive less funds as a result of taking such measures. For *all* agencies would then be spending more money on such measures that could be spent directly on aid activities, and revealing more about the problems of aid, and for the reasons given above this might be off-putting to some potential contributors. There is also the danger that the media would tend to focus on any negative findings, rather than seeking to give a balanced view, which would help to foster an unfairly negative view of the work NGOs do.⁵¹ And similarly, organisations ideologically opposed to NGOs might also pounce on any negative findings and use them in their campaigns against NGOs.

Of course, if publishing more evaluations and related material made a significant impact on the Epistemic Problem, and if in particular doing so provided strong evidence that the effects were good enough, then for the reasons given in section 3 any reductions in donations resulting from such factors might be more than compensated for by extra donations given by people willing to give, or to give more, as a result of this new evidence being available. NGOs that are unsure whether these conditions are met, though, or that doubt whether making it easier for people to find out that the effects are

⁵⁰ This is also the natural solution to danger that less scrupulous agencies might outcompete more scrupulous ones (see 2.3 above). NGOs have been slow, however, to set up such forms of regulation. For discussion of some of the initiatives that have been set up, see Roche in this volume and 4.4 below.

⁵¹ This danger is illustrated by the experience of the Disasters Emergency Committee (DEC) in the UK, an umbrella organisation representing 13 UK aid agencies. For several years, DEC made publicly available independent evaluations of the work of their agencies. The media tended to focus exclusively on the negative elements of such reports, however, and in response DEC now commission two reports, one for public consumption and the other for insiders only.

good enough would lead them to give more, may believe that the net effects on donations of a policy of publishing more evaluations and related material would be negative. And if so, this may lead them to resist such a policy, whatever its merits.

A policy of publishing evaluations might also have other negative consequences. If NGOs know that their evaluations will not be published, they need not be inhibited from evaluating their own work critically, or from focusing on problem activities.⁵² If they know that their evaluations will be published, by contrast, they might be tempted to try to ensure that the only projects that are evaluated are the ones most likely to be judged successful, and that all projects are evaluated in a ‘friendly’ manner.

A policy of publishing more evaluations, then, might have negative consequences. It is difficult to assess how significant these consequences would be, but in any case the risk of such consequences may lead NGOs to think twice about adopting such a policy. Given that it is also unclear how much impact adopting such a policy would have on the Epistemic Problem, it seems a good idea to turn to other responses to that problem.

4.2: An independent body could be set up to evaluate the work of NGOs and report back to contributors

As I have said, one reason why the kinds of measures discussed in 4.1 might be insufficient to solve the Epistemic Problem is that contributors may be unsure whether to trust data supplied by NGOs. The obvious solution to this problem is to set up a body

⁵² There is some evidence that this happens at present, for those who have access to the relevant material often say that evaluations conducted by NGOs themselves tend to be more critical than evaluations conducted by other parties (see e.g. Kruse et al. 1997, 2.3, 4.1). And it seems plausible that one reason for this is that evaluations conducted by NGOs tend not to be made publicly available.

of experts to advise contributors, a body that is genuinely independent of NGOs, and (as far as possible) free from any other pressures that might distract it from the task of providing clear and honest advice to the general public. If such a body were able to access or collect sufficient data to support well-based assessments about the effects of the work aid agencies do, it could then convey those assessments to contributors, and non-experts could simply trust those assessments. And thus, as I said in 2.1, the Epistemic Problem would be solved.

One could imagine more or less ambitious versions of such a body. The most ambitious would be one with sufficient resources to do its own evaluations of the activities of NGOs. Despite calls from aid specialists from time to time for such a body,⁵³ however, few steps in this direction have been made.⁵⁴ Are significant further steps in this direction a realistic prospect? One major issue would be funding. It would not be cheap to set up such a body and finance its evaluations, and who would pay? Contributors may generally be unwilling to fund such a body, given the widespread preference that all their money is spent on projects. NGOs themselves might have mixed attitudes, in part for the reasons given below. The best hope, then, may be UN or other intergovernmental bodies, or private foundations.

If funding could be provided, then the other major issue would be that of getting permission from NGOs to evaluate their activities and report back to the public on their

⁵³ Michael Maren (1997, p.269) writes, for example, ‘What is really required is a truly independent agency . . . to look after the interests of the targets of development and relief, a.k.a. the needy. The organization should be staffed by professionals who have the time and resources to produce detailed analyses of what these organizations [NGOs] are doing for the poor of the Third World. Those that do effective work should be singled out so that “customers” know where to spend their money’.

⁵⁴ I briefly discuss some of most significant ventures of this kind – all set up by NGOs themselves, rather than by an external body – in 4.4.

findings. For there are a number of reasons why NGOs might feel uncomfortable about such a process. One obvious reason would be the fear of a negative report. As far as this consideration goes, one would expect NGOs' decisions about whether to sign up to such a scheme to be determined by the degree of confidence they have about their work. If that is right, then a two-tier system might develop, with some NGOs taking part in the process and others not. And on the face of it, such a two-tier system would not be a bad thing, as long as the NGOs that signed up tended to be the ones whose activities had the best effects. It would be good for contributors, keen to give in ways that would do the most good, for they could direct their funds to those NGOs that were confident enough to take part in the process and which received positive reports. And it would be good for the system as a whole, as the more effective NGOs would presumably receive more funds while the less effective would receive less.

Matters may not be quite as simple as that, though, for there are also a number of reasons why even the more confident NGOs might have reservations about taking part in such a process. Even if the overall findings of such a review were positive, for one thing, it would again inevitably reveal more about the negative aspects of aid than most NGOs have been willing to be open about publicly so far. And as I said in 4.1, this might have a number of consequences that NGOs would not welcome. Despite the competitive tendencies mentioned in 2.2, moreover, it appears that NGOs will go to great lengths to present a united front in public, and this too may discourage them from a process that would lead to a two-tier system.

Again, if the findings of such a review were sufficient (in combination with other sources of evidence) to show that the effects were good enough, then any such deterrent effects on donations might be more than compensated for by new donations. I discussed this issue in section 3 and in 4.1 and will not do so again here. For now, I

shall just say that if NGOs suspect that the kind of process I am discussing would lead to fewer donations they might refuse to sign up to it, which would undermine its feasibility.

Setting up a body which conducted evaluations of NGO activities and reported back to the general public on the findings would in effect give a greater importance to evaluations, and this might provide further reasons why some NGOs would resist it., for there are a number of concerns about giving evaluations such a significant role (Riddell 1999, pp.223-7; Isbister in this volume). One such concern is that evaluations may lead to a temptation to focus more on achieving the kinds of indicators that will ensure a good evaluation than on what would really do most good. Relatedly, a focus on evaluations might affect the kind of work that gets funded, and consequently the kind of work that aid agencies tend to concentrate on, in negative ways. There may be a temptation to focus on activities that lend themselves better to evidence of concrete results, for example, rather than less tangible work that may in fact be more important.⁵⁵ And a further concern that is often mentioned is that focusing on evaluation may engender moves away from innovation and experiment.

This issue is further complicated by the fact, noted in 2.2, that rather than implementing projects themselves, many Northern NGOs now work largely or wholly through local 'partners', such as Southern NGOs and Community Based Organisations. In order to evaluate the activities of such a Northern NGO, then, one would presumably need to evaluate the work of its local partners. This, however, raises thorny issues

⁵⁵ It is often claimed, in particular, that development is complex, non-linear and hard to measure, and that therefore an insistence on measurement leads to activities that are anti-developmental. Rondinelli 1983 is often cited in this context.

concerning surveillance and lack of trust. More broadly, there is what Alan Fowler (2000, pp.23-4) calls the ‘sustainability-accountability paradox’:

On the one hand, sustainability requires progressive integration of the products and effects of interventions into the ongoing processes of economic, social, political and cultural life that surround them. . . . On the other hand, to demonstrate and be accountable for performance, the effects of NGDO interventions must be visible and attributable. In attempting to make this possible—to satisfy donors—NGDOs often deliberately or unconsciously “ring-fence” projects to show differences resulting from specific inputs. Where this phenomenon occurs—irrespective of the “integration” that project documents call for—it acts as a constraint to linking, embedding and sustainability.

Such factors, then, provide another set of reasons why some NGOs might resist having their work evaluated in the kind of way I am considering here. Are they sufficiently strong reasons to justify refusing to do so? As a non-expert, it is again difficult for me to judge, but I have to say that I am somewhat skeptical. For one thing, it seems reasonable to hope that ways of conducting evaluations could be developed which would reduce the kinds of risks just sketched to manageable levels. If so, then those risks would not present very strong objections to giving evaluations a greater role. If not, then as far as I can see the issue would depend largely on whether it is possible to gain sufficient knowledge of the effects of aid activities without conducting such evaluations. To the extent that it *is* possible to do so, it may be better not to do more evaluations, if the disadvantages of conducting such evaluations are sufficiently serious. To the extent that it is *not* possible to do so, however, it would seem hard to justify not conducting more evaluations, even if doing so had the kinds of unfortunate consequences just sketched, for it seems highly irresponsible to conduct activities with

such vulnerable people if one really has little reliable evidence about the effects of those activities.⁵⁶ This is mainly due to the risk of significant negative effects. Good intentions would provide no excuse for conducting activities that had such effects, if all reasonable steps had not been taken to find out how great the risks of such effects were. And if (more) evaluations would have helped, but have been resisted, then this condition would not be met.⁵⁷

In any case, whatever the rights and wrongs are, concerns about the potential negative consequences of giving a greater role to evaluations may provide further reasons why some NGOs would resist taking part in the kind of process I am considering here, and thus undermine its feasibility.⁵⁸

4.3: Less ambitious bodies

If it would not be feasible to set up the kind of body described in 4.2 – and at least in the meantime, while such a body does not exist – one might consider less ambitious alternatives. One such alternative would be a body with a similar remit of reporting to the general public about the work of NGOs, but which restricted itself to data that was

⁵⁶ A lot depends here on what forms of evaluation are able to provide sufficiently reliable information about the effects. This is a complex and somewhat technical matter, though, and aid experts themselves seem to be divided about it. For relevant discussion, see Cracknell 2000; Banerjee 2007; and Roche in this volume.

⁵⁷ As Savedoff et al. (2006, ch.3) write, ‘No responsible physician would consider prescribing medications without properly evaluating their impact or potential side-effects. Yet in social development programs, where large sums of money are spent to modify population behaviours, change economic livelihoods, and potentially alter cultures or family structure, no such standard has been adopted’.

⁵⁸ For more on why NGOs (and other organisations) tend to be so resistant to evaluation, see Biekart 1999, pp.104f and Pritchett 2002.

already available, rather than conducting its own evaluations. Such a body would of course be a great deal cheaper than one that also conducted evaluations. Could it still make a significant impact on the Epistemic Problem? That would depend on the degree to which there is already enough reliable data on the work aid agencies do (whether publicly available or not) to enable such a body to come to well-based judgements about the effects of their work. To the degree to which there is enough data, we would already be tantalisingly close to a solution to the Epistemic Problem. All that would be necessary is for a suitable group of experts to get access to that data, draw relevant judgements based on it, and then pass on those judgements to the general public.

Is there already enough data of this kind? As an outsider it is again difficult to judge, and the issue is complicated both by the fact that it concerns a matter of degree, rather than an all or nothing matter, and that the answer might be different for different forms of aid. At the time the DAC Study was produced (in 1997), the authors evidently didn't feel that they had sufficient reliable data to make any judgement about the overall effects of the development work NGOs do. And though more attention has been given to evaluation over the last ten years, it still seems unlikely that there is currently sufficient data for such a body to make such a judgement with any confidence (Riddell 2007, chs.16-19). Even if this is right, though, there might be sufficient data for such a body to offer at least certain kinds of estimates about certain kinds of aid. There might be some NGOs which already ensure that their own activities are evaluated with sufficient rigour and objectivity to allow those who know how to interpret such data to make reasonably reliable estimates of their effects, for example. In such cases, an independent body might merely have to play the role of an honest broker between these NGOs and the public, interpreting the data in question and reassuring the public of its reliability. And similarly, there might already be enough data about certain sectors or

types of activity for such a body to offer reasonably confident judgements concerning them.⁵⁹

Even such partial information might be of decisive import to potential contributors, if such a body were able to report with sufficient confidence that at least certain forms of aid had effects that were judged to be good enough. For as I said in section 3, it might follow that individuals should fund that particular form, whether or not they should give to aid agencies in general. And if so, this would solve the key practical question for potential contributors: ‘Is there *something* in this area that it is relatively clear I ought to do?’⁶⁰

Publishing just such information might also have other positive consequences. If the body in question were able to identify certain forms of aid had relatively good effects, then the general public would presumably respond by giving more to those forms, which on the face of it at least would be a good thing.⁶¹ It would also reward

⁵⁹ The authors of the DAC Study reported that both the quality of the data and the substantive findings were better in relation to certain of the activities evaluated, in particular certain child survival and microenterprise programmes (Kruse et al. 1997, ch.5).

⁶⁰ Providing such information would also provide a strong sincerity test for people who say, ‘I would give to an aid agency if I had sufficient reason to believe that the effects of its work were good enough’. (If, on the other hand, it turns out that no kind of aid has effects that are good enough, then it would of course also be helpful to be told that.)

⁶¹ ‘On the face of it’, because such a tendency may also have certain negative consequences. If a lot of people supported the forms of aid in question, those forms may become swamped with more resources than they can profitably use, while other equally good or better forms of aid are neglected. Such problems would be compounded, moreover, if there was a mismatch between the forms of aid that it is easiest to confirm have good enough effects, on the one hand, and the forms of aid that have the *best* effects, on the other. For if so, the forms of aid that people would tend to gravitate to when they follow this strategy would not be those that have the best effects.

those agencies that have conducted or commissioned evaluations of their own activities rigorous and objective enough to enable an independent body to make reasonably confident judgements about the effects of their work. And it would also provide an incentive to other NGOs to follow their example.

What about negative consequences? A number of the considerations from 4.2 would be relevant again. The effect of setting up such a body would be to give evaluations more importance, and this may have negative effects as well as positive ones. It is also possible that publishing more information about the effects would deter some contributors from giving, even if that information showed that at least certain forms of aid had effects that were good enough. For the reasons given in 4.2, though, such concerns do not seem to me to give sufficient reason not to go ahead, at least absent any alternative serious attempt to tackle the Epistemic Problem. Even if this is correct, though, such factors might again provide some reasons why some NGOs would think twice about signing up.⁶²

The body I have had in mind so far in this section, like that considered in 4.2, would aim to provide as comprehensive information about NGOs and the effects of their work as possible, though of course it might have to be much more selective in practice, if few NGOs signed up, or if there were insufficient data to enable such a body to form judgements about certain forms of aid. An even less ambitious alternative would be a body that did not even aim to provide such comprehensive information, but focused instead on sifting through the available data in order to find forms of aid that it was able to say with some confidence have good enough effects, in order to alert the general public to their existence. As long as the reports of such a body were sufficiently

⁶² Again, I focus on the more ‘respectable’ reasons. Other more questionable reasons may of course also play a role, such as the fear of being ‘found out’, or of losing ‘market share’.

reliable, they too would be able to resolve the key practical question for potential contributors, and could therefore make a big difference.

Interestingly, certain potential models for such a body have recently emerged in the world of philanthropy, in response to a more uptown version of the Epistemic Problem. *The Economist* (2006) quotes Gavyn Davies, ex-Goldman Sachs banker, as saying that when he and a colleague decided they wanted to do some philanthropy, ‘We found there wasn’t enough information produced in a hard-headed, independent, high quality way, made available to all’. In response, they created an organisation called New Philanthropy Capital, with the remit of producing such information, and in particular information about effective organisations and projects/alerting philanthropists about effective organisations and projects. Their hope was the same as the one that informs this paper: that providing such information might lead to more donations, both in total, and especially to the best organisations. As Davies puts it (ibid.):

This was an investment designed to have a levered effects on other people’s giving. We wanted to increase giving by enabling donors to be more confident that they were having an impact on people’s lives.

Perhaps other philanthropists, or foundations, or other agents or agencies with sufficient resources might consider setting up similar organisations for people who lack the resources to be philanthropists on any significant scale.⁶³⁶⁴

⁶³ As this paper goes to press, I read in Singer 2009 that such an organisation has in fact been created, called ‘GiveWell’ (see the relevant website and Singer 2009, ch. 6).

⁶⁴ A further possibility, suggested to me by Chris Roche, is that AusAID and the Committee for Development Cooperation could make public the accreditation studies (or elements thereof) that they undertake for every accredited agency every 5 years. (Naturally, similar bodies in other countries could

4.4: Initiatives to improve accountability and standards

In recent years, a number of initiatives have been set up by groups of NGOs to improve accountability and standards in the field of humanitarian aid. These include Sphere, which has developed a set of ‘Minimum Standards in Disaster Response’ that ‘sets out for the first time what people affected by disasters have a right to expect from humanitarian assistance’; the Active Learning Network for Accountability and Performance in Humanitarian Action (ALNAP), which is ‘dedicated to improving humanitarian performance through increased learning and accountability’; and the Humanitarian Accountability Partnership (HAP), which aims ‘to make humanitarian action accountable to its intended beneficiaries through self-regulation, compliance verification and quality assurance certification’.⁶⁵

In principle at least, such initiatives might be able to have a significant impact on the Epistemic Problem. One way in which could do so simply is by increasing the quality or quantity of evaluations available in some form to the general public.⁶⁶ But the standards developed by certain of these initiatives might also be able to provide a useful or alternative or supplement to such evaluations. If, in particular, following such standards were reliably correlated with achieving good enough effects, then by checking whether the relevant activities have met those standards it may be possible to judge

do the same.) Indeed, one could argue that it would be very much in line with AusAID’s accountability to the taxpayer to do this.

⁶⁵ All the quotations are from the relevant websites. For more discussion of these developments, see Roche in this volume.

⁶⁶ ALNAP in particular focuses on issues concerning evaluation – see <http://www.alnap.org/themes/evaluation.htm>.

whether those activities have achieved such effects *without* having to conduct the kind of evaluations that attempt to measure the effects more directly.⁶⁷ Given the current undersupply of rigorous evaluations,⁶⁸ and the apparent obstacles to conducting more of them, such a substitute or supplement may prove very useful indeed.

In practice, though, it is less clear how much of an impact such initiatives might have on the Epistemic Problem. By its own account, ALNAP seems to have had little success so far in improving the quality of evaluations so far.⁶⁹ The development of auditable standards is currently in its infancy even in the field of humanitarian aid, moreover, and there is to my knowledge nothing comparable in relation to other forms of aid.⁷⁰ Furthermore, it is unclear whether following such standards is in fact sufficiently strongly correlated with achieving good enough effects as to be able constitute a substitute for more standard evaluations. Those who are not experts on aid will not of course be in a position to judge this matter, and there appears to be little

⁶⁷ The set of standards developed so far that would appear most likely to be able to play that role is that of the Humanitarian Accountability Partnership, which employs a certification system that measures performance against a set of apparently tough-minded auditable benchmarks; see <http://www.hapinternational.org/projects/certification.aspx>. For discussion, see again Roche in this volume.

⁶⁸ This apparently applies to official aid as well as NGO aid. To quote from a World Bank study of evaluation, for example, ‘Despite the billions of dollars spent on development assistance each year, there is still very little known about the actual impact of projects on poor people’ (Baker 2000, cited in Easterly 2006, p.194). See also Savedoff et al. 2006.

⁶⁹ See its annual meta-evaluations, available at <http://www.alnap.org/themes/evaluation.htm>.

⁷⁰ See Roche in this volume, though, for a sketch of how some of the initiatives developed in the humanitarian field might be extended to other forms of aid.

consensus among the experts about such issues concerning accountability and evaluation.⁷¹

It is unclear at present, then, how much impact such initiatives might have on the Epistemic Problem. Nevertheless, they are surely positive development. As long as the relevant standards are suitably gauged, the fact that an NGO had met those standards would certainly give some reason for reassurance to contributors, whether not doing so is able on its own to provide sufficient evidence that the effects are good enough. The fact that these initiatives have been set up by NGOs themselves is, moreover, an encouraging sign that (at least some) NGOs are serious about improving their practice, and also an indication that such initiatives may encounter fewer feasibility problems than some of the other measures considered in this section.⁷² Such initiatives, then, seem to offer some hope for the future whatever their impact on the Epistemic Problem now.

4.5: Experts can simply offer their personal judgements

The final way I will consider here to make it easier for non-experts to find out how good or bad the effects are is simply for those with relevant expertise to offer their judgements in print about this matter. Potential contributors may not be able to rely on such judgements as confidently as they could rely on the findings of the kinds of bodies considered in 4.2 and 4.3, for while it would presumably be clear that such findings were based on a thorough, impartial review of the available evidence, it would be harder

⁷¹ See the references given in n. 56 above.

⁷² At least in part, this may be because such measures are focused mainly on improving practice and increasing accountability to recipients, for generally NGOs seem to be more motivated by those goals than by the goal of providing more reliable information to contributors.

to determine how this or that expert had arrived at their judgements. In the absence of any such body, however, or any other way of making it easier for non-experts to find out how good or bad the effects are, such informal judgements made by experts might be a lot better than nothing. Indeed, if such judgements were sufficiently positive, and were taken to be sufficiently reliable, then they might again be decisive for certain potential contributors, willing to give only if they receive sufficient assurance about the effects.

On the conception of expertise that I have in mind here, one is an expert in a certain field to the degree that one is well-placed to make reliable judgements about that field. The relevant judgements here are generalisations about the effects of NGO aid, and so the experts would be those well-placed to make such generalisations. And that would typically reflect such factors as relevant training and experience, familiarity with the relevant literature and data, as well more general traits such as intelligence, insight, and so on.⁷³

Chris Roche asked me why I focus particularly on the judgements of experts here. Can't one also draw on the views of other people who may not qualify as experts, such as the recipients of aid, and aid workers with limited experience and knowledge? In reply, I would say that such views may indeed be helpful, but much less helpful for current purposes than the judgements of experts. Recipients and aid workers would be able to offer their views about the particular activity or activities they had experience of. It would be rash, though, to base a judgement about the effects on such accounts. It would be hard to tell whether such views are representative, for one thing. And in

⁷³ I fear that the use of term 'experts' may set off alarm bells among certain readers; if so, one may substitute the term 'aid specialists' instead. The important point is of course not the label, but what the label denotes: those who are relatively well-placed to make generalisations about the effects of NGO aid.

addition, such people may not know much about the long-term or systemic effects of the relevant activities, or about their effects on those apart from recipients.

In order to arrive at an overall view that one has much reason for confidence in, then, one would at the least need to take account of a wide range of such personal accounts, and also of whatever data is available on non-immediate effects. And this would be a time-consuming and demanding task. What I am seeking here is precisely a way in which non-experts can form judgements about the effects that they have some reason for confidence in *without* having to take on such a task. Even those who are willing to do so, moreover, are presumably less likely to reach a correct judgement than those who have years of experience and training in the relevant field, as well as a thorough grip on the relevant data – that is, the experts.

If experts were willing to offer their judgements, then, that could save non-experts a lot of labour, as well as providing judgements that would probably be more reliable than anything non-experts could come up with on their own. As I said in section 2.1, though, experts seem very reluctant to do so.⁷⁴ Why might this be? A variety of factors may have some influence. Like experts in many other fields, aid experts may simply tend to prefer communicating with other experts than with the general public. Some may not realise the full extent of the Epistemic Problem, or its unfortunate consequences, and thus not appreciate how helpful to non-experts such judgements

⁷⁴ There are of course a number of books and articles on NGO aid by experts, such as those I cited in section 2, many of which offer helpful information, and some of which are aimed at least in part at the general reader. None of those I am aware of offer the kind of estimates of the effects potential contributors need to determine whether they should give to aid agencies, though.

would be. And some may think that it is more important to highlight problems with aid, in an attempt to prompt reform, than to attempt estimates concerning the effects.⁷⁵

None of these factors constitutes reasons of principle not to offer such judgements, and so none of them would prevent experts who did appreciate the importance of offering such judgements from doing so. Are there any other factors that do constitute such reasons? One obvious candidate would simply be the fact that experts too find it very difficult to make such judgements with much reason for confidence, given the complexity of the issues, the variability of the effects in different circumstances, and the lack of reliable data. The decisive response to this, however, is to point out that however difficult experts might find it to make such judgements, it would still be easier for them to do so than for those of us who are *not* experts. Given that we need such judgements in order to determine whether we should give, then, it would still be very helpful if they told us – tentatively, perhaps, with whatever qualifications are necessary – what they think.⁷⁶ Even if the experts felt unable to offer a judgement about

⁷⁵ On an optimistic reading, this factor would help to explain why so much of the literature on NGOs is so negative.

⁷⁶ Riddell (2007, p.444, n.23) writes that ‘it is neither possible, nor particularly helpful, to try to draw simple and sweeping across-the-board conclusions about the impact of NGO development interventions’. He does not address the obvious reply: that even if ‘simple and sweeping across-the-board conclusions’ are not possible, complex conclusions, or estimates concerning particular forms of aid, might be. Similarly, Chris Roche has put it to me that because they of the very fact that they recognise the complexity of the relevant issues, experts will not be willing to provide a ‘simple homogenising answer which would contradict what they know to be true – i.e. that success and failure are very context-specific’ (private communication). But again, let me emphasise that I am not assuming that the relevant judgements need to take this form. Such a judgement might, for example, be so qualified and nuanced that it takes thousands of words even to state. For an example of such a complex judgement – though not, unfortunately, from an expert – see Horton 2009.

the effects of the work aid agencies do as a whole, moreover, it seems wildly implausible that *none* of them is able to offer *any* informed guesstimate about *any* form of aid.

The collective failure by aid specialists to offer any such help to potential contributors – ideally, by putting together some kind of review or handbook, but failing that by simply offering their own judgements – seems to me a serious failing. Since they are the people best-placed to make the relevant estimates, such experts are uniquely able to play the key intermediary role of helping non-experts to form judgements about the effects that are more reliable than any they could form on their own. Given that non-experts need to make such judgements in order to make well-informed decisions about whether to give to aid agencies, and given the potential consequences of making the wrong decision (as set out in section 3 above), this role is an absolutely crucial one. So far, though, the experts have failed to engage with it.

Given certain not entirely implausible premises, the consequences of such neglect would be momentous indeed. If, in particular, we (non-experts) should not give to aid agencies unless we have sufficient reason to believe that the effects are good enough, it is impossible for us to arrive at sufficient reason to believe this on our own, those effects (or at least the effects of certain forms of aid) are in fact good enough, it is possible for aid experts to find this out (to the appropriate degree of confidence), and we would have sufficient reason to believe this too if those experts told us so in a suitable fashion, then those experts would be in possession of a kind of awesome normative power – the power to make it the case that we should or should not give to aid agencies. For given those premises, if such experts did tell us that the effects were good enough, that would make it the case that we should give. And if they did not, that would make it the case (given that we shouldn't give unless we have sufficient reason to believe that

the effects are good enough, and that we can't arrive at such reason on our own) that we should not.

If this argument is sound, then, the relevant experts have made it the case that we should not give, since they have not in fact told us whether the effects are good enough. What a tragedy that would be if the effects are good enough! Now in fact, I do not think that all of the premises in the little argument sketched above are quite correct.⁷⁷ And so I do not think that experts have quite this much normative power. I do think, nonetheless, that those premises are close enough to the truth to bring out how crucial the position experts occupy is, and how important it therefore is for them to provide the general public more assistance in making judgements about the effects.⁷⁸

5: REVIEW

⁷⁷ For one thing, I think that it is probably difficult rather than impossible for non-experts to come to a judgement about the effects that they have sufficient reason to feel confident about on their own.

⁷⁸ In response to this argument, one expert at the workshop where a draft of this paper was discussed offered his view that the effects were indeed good enough. This individual has a lot of professional experience with such NGOs, including evaluation of their activities, but has never worked for an NGO himself, and so is presumably relatively unlikely to feel institutional or personal pressures to give a positive verdict. (Indeed, he emphasised how much it pained him to give this verdict, which I take to be a reflection of how focused on the deficiencies of aid such experts tend to be.) For these reasons, among others, his judgement seems likely to me to be a relatively reliable one (though of course one does not know how good this expert believes the effects need to be in order to be 'good enough' (see n. 14 above)). Another expert expressed the same view to me privately after the workshop, and added that in his view 8 out of 10 'key informants' would agree. Though this is again encouraging, it should be said that this individual has spent his life working for an NGO, which might mean that the risk of bias is higher in his case.

In section 2, I explained why I think it is very difficult for non-experts to find out how good or bad the effects of the work aid agencies do are. In section 3, I showed that this state of affairs may have certain very bad consequences. And accordingly, in section 4, I articulated and discussed several measures that might be taken to make it easier to find out how good or bad the effects are.⁷⁹ This exercise turned out to be even more complicated than I had anticipated, and I am aware that I have barely scratched the surface of many of the issues. I am also aware that the fact that I am not an expert on aid means that I am hardly the person best-placed to write about these issues. I hope, though, that this attempt will at least be enough to stimulate others – including others with more knowledge of NGOs and their work than I have – to do so. For the potential reward of doing so is very great. If, in particular, what I said in section 3 is correct, then reforms that made it easier for non-experts to find out how good or bad the effects are might lead to major benefits for the global poor.

⁷⁹ There are other measures which I lack space to discuss here. One would be for NGOs to change their activities in ways which would make it easier for potential contributors to find out more about the effects, for example by selecting activities that lend themselves relatively easily to measurement, and then providing such measurements. Obviously, such a suggestion would raise several of the concerns mentioned towards the end of 4.2.

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