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Alan Hudson

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What is This?

Advocacy by UK-Based Development NGOs

Alan Hudson
International Development Select Committee,
House of Commons

With Northern development nongovernmental organizations (NGOs) becoming more involved in advocacy and policy influence, they are increasingly being asked questions about their effectiveness, legitimacy, accountability, and governance. In an effort to contribute to these debates and to inform NGOs' thinking, this article provides an overview of the advocacy activities of UK-based NGOs. Using material from a recently completed research project, this study examines the growth of UK NGOs' advocacy; the ways in which NGOs actually do advocacy; the position of advocacy within NGOs; the efforts of NGOs to work together in advocacy in the face of pressures to differentiate themselves; the ways in which NGOs relate to donors; issues of legitimacy, representation, and accountability; and evaluation.

Over the past decade, development-focused nongovernmental organizations (NGOs) have become increasingly involved in advocacy and policy work in an effort to influence the behavior and policies of consumers, corporations, governments, and international organizations (see, for instance, Bryer & Magrath, 1999; de Senillosa, 1998; Simmons, 1998). Moving from a "development-as-delivery" to a "development-as-leverage" approach, many NGOs have altered the mix of their activities in recognition of the fact that traditional "operational" development activities are ineffective and unsustainable when poor communities find themselves in unfavorable policy environments that are beyond their control (Edwards, Hulme, & Wallace, 1999; Lewis & Wallace, 2000).

As NGOs have gained higher profiles through their efforts to influence the policies of international organizations such as the World Trade Organization (WTO), the World Bank, and the International Monetary Fund, a variety of

questions have been asked about NGOs and their advocacy. These questions concern the appropriate roles of NGOs, especially Northern NGOs, in the development of institutions of global governance and processes of international development, and have been couched in terms of issues of effectiveness, legitimacy, accountability, governance, and political responsibility (Bond, 2000; Brown & Moore, 2001; Chapman & Fisher, 2000; Edwards, 2000; Nelson, 1997).

In terms of effectiveness, questions have arisen about whether a shift into advocacy and influencing work will make more of a difference to the lives of poor and marginalized groups in the South and whether it is the most cost-effective use of NGO resources. Regarding their legitimacy, NGOs have increasingly encountered the criticism that they are not representative organizations in any obvious sense, bringing their credibility as advocates for the poor and marginalized South into question (Edwards, 1999; Nyamugasira, 1998). In a similar vein, it has been suggested that NGOs are poorly accountable to the people whose interests they claim to promote and that this undermines any claim to legitimacy. In relation to governance, it has been suggested that NGOs' existing governance structures may be poorly suited for organizations that are moving further into advocacy and policy influence (Foreman, 1999). Finally, providing a clearer framework for considering issues of legitimacy, accountability, and representation, NGOs working in transnational advocacy and development networks have been urged to embrace their political responsibilities to other actors in the network (Van Tuijl & Jordan, 1999).

Several commentators have concluded that the key to effective, legitimate, and accountable advocacy is to link the levels—from operational work, through national level advocacy, to advocacy to international organizations, and back again to the grassroots—and that international NGOs are well placed to develop such linkages (Edwards, 1993; Fowler, 1997; Madon, 2000). As Bryer and Magrath (1999) put it: "advocacy is most effective when it does two things well. It has to demonstrate the links between micro and macro, between conditions and causes, and it must itself operate at each different level as part of change processes" (p. 171).

In an effort to contribute to such debates and to inform NGOs' thinking, this article provides an overview of the advocacy activities of UK-based NGOs. It is hoped that the study will inform such thinking by allowing NGOs from the United Kingdom and elsewhere to compare their ways of doing advocacy with the NGOs that were involved in the research project from which this study has been developed. The paper summarizes the findings of the research project, examining the growth of UK NGOs' advocacy; the ways in which NGOs actually do advocacy; the position of advocacy within NGOs; the efforts of NGOs to work together in advocacy in the face of pressures to differentiate themselves; the ways in which NGOs relate to donors, specifically the UK Government's Department for International Development (DfID); issues of legitimacy, representation, and accountability; and evaluation.

RESEARCH METHODS

The initial aim of the research project was to understand the relationship between the organizational frameworks that UK-based NGOs adopt for their advocacy work and the effectiveness of such advocacy, to inform their advocacy activities and increase their effectiveness. Beginning with a simple conceptual framework that related "organizational framework" to "organizational effectiveness," the research project developed into a broader examination of the issues that NGOs face in organizing their international advocacy—including issues of governance, legitimacy, and accountability—and the various ways in which NGOs seek to deal with such issues.

Data collection took place over the summer of 1999. Forty-four hour-long semistructured research interviews with individuals from the UK NGO sector and DfID were arranged, conducted, taped, and transcribed. In addition, supplementary documents such as annual reports and mission statements were collected. Thirty-one NGOs were examined, ranging from household-name NGOs with complex international operations, budgets of up to £ 100m, and hundreds of staff members to tiny issue-specific NGOs with budgets of around £ 100,000 and a handful of staff members (see Table 1). The interviews and supplementary material were rigorously analyzed using software for qualitative data analysis.

RESEARCH FINDINGS: ADVOCACY
BY UK-BASED DEVELOPMENT NGOS

Advocacy has a wide range of meanings for NGOs. Most frequently, advocacy is seen as involving efforts to change institutions' policies in ways that are expected to favor the poor and marginalized. Confusion about the meaning of advocacy arises from the fact that its central meaning is often confused with the range of approaches to advocacy, the mixture of activities that can be part of advocacy, and the variety of target groups that advocacy can involve.

A SHIFT TO ADVOCACY?

Definitional problems, and the fact that some of the "growth" is a relabelling of pre-existing activities, make a clear assessment of the growth of advocacy problematic. That said, advocacy is definitely a growth area, with many of the NGOs describing themselves as "new to advocacy." As with other development trends—such as participation, micro-credit, and gender-sensitive analysis— advocacy has rapidly diffused through the NGO community, with only a few conservative NGOs opting out of the trend and seeing the shift to advocacy as an unhelpful bandwagon. As one experienced NGO worker commented: "There's a bit of development theology around the fact that unless

Table 1. Nongovernmental Organizations (NGOs) Involved in the Research Project

Generalist NGO	Aim	Income £ Million (1998)
Oxfam	To relieve poverty, distress, and suffering and to educate the public about the nature, causes, and effects of poverty	98
Save the Children Fund	To promote the rights of, and provide services for, children	86.5
Christian Aid	To help the poor, regardless of religion or race, to improve their lives and tackle causes of poverty and injustice	48.23
Action Aid	To work with the poor and marginalized to eradicate poverty and overcome injustice and inequality	42.4
Tearfund	To work in partnership to bring help and hope to communities in need around the world	33.7
Voluntary Service Overseas	To enable men and women to work alongside people in poorer countries, to share, build capacities, and promote understanding	25.46
CAFOD (Catholic Fund for Overseas Development)	To promote human development and social justice in witness to Christian faith and gospel values	19.9
World Vision	To work with the poor and oppressed to promote human transformation, seek justice, and bear witness	17.86
ACORD (Agency for Cooperation and Research in Development)	To reduce poverty and vulnerability and help people win their basic rights	10.53
CIIR (Catholic Institute for International Relations)	To tackle the causes of poverty and injustice internationally through advocacy and skill sharing	4.37
War on Want	To work toward the elimination of poverty	1.78
World Development Movement	To win policy changes that benefit the world's poor	0.5

Specialist NGO	Aim	Income £ Million (1998)
Marie Stopes International	To ensure the fundamental human right of all people to have children by choice, not by chance	21.32
Intermediate Technology Development Group	To enable poor people in the South to develop and use skills and technologies that give them more control over their lives and contribute to the sustainable development of their communities	8.37
Wateraid	To work toward a world in which all people have access to safe water and effective sanitation	8.19
Help Age International	To improve the quality of life for poor older people	7.53

(continued)

Table 1   Continued

Specialist NGO	Aim	Income £ Million (1998)
International HIV/AIDS Alliance	To enable communities in developing countries to play a full and active role in the global response to AIDS	5.21
Consumers International	To support and strengthen member organizations and the consumer movement	3
Population Concern	To advance the rights of all people to exercise free and informed reproduction health choice	2.52
Traidcraft Exchange	To fight poverty through fair trade	1.7
Action on Disability and Development	To promote and support grassroots disability groups	1.67
Healthlink Worldwide	To improve the health of poor and vulnerable communities by strengthening provision, use, and impact of information	1.56
Minority Rights Group International	To secure the rights of ethnic, religious, and linguistic minorities worldwide	1.09
Africa Resources Trust	To support the rights of rural communities to use their natural resources	0.92
Child Hope	To act as a voice on behalf of street children	0.7
Anti-Slavery International	To promote the eradication of slavery and slavery-like practices	0.55
Akina Mama wa Afrika	To enhance the leadership capacities of African women	0.36
Commonwealth Medical Association	To strengthen the capacity of national medical associations in developing countries to improve health and well-being of their communities	0.3
Banana Link	To promote sustainable trade and production in bananas	0.16
Babymilk Action	To protect and promote breastfeeding to save lives and avoid unnecessary suffering	0.15
Tourism Concern	To promote change in the tourist industry toward just, sustainable, and participatory tourism development	0.14

Note: Where the NGO is part of an international alliance or family, the income level given is for the UK component of the NGO—or, in the case of Oxfam, Great Britain and Ireland.

you have advocacy on your agenda, you're not a complete player" (director, large specialist NGO).

Some NGOs self-consciously situate their shift to advocacy in relation to debates about the role of Northern NGOs in an emerging global civil society. One interviewee explained that "you've got huge debates going on about the institutional infrastructure of global governance, the role of civil society, NGOs, third sector etc. . . . and the Northern NGOs see themselves as playing a role in that" (senior policy officer, large specialist NGO). Perhaps more concretely, many NGOs see their shift to advocacy as coming about in recognition

of the limited and short-term impacts of traditional operational development work and in an effort to "scale up" their impact. As one interviewee put it, "we used to understand poverty within narrowly defined geographical areas, and began to understand it as a national process, and then a global process. So I think influencing has to follow that understanding" (head of Northern affairs unit, large generalist NGO). More pithily, another interviewee asserted that "advocacy work can deliver a bigger bang for your buck" (senior policy officer, large generalist NGO).

PRACTICING ADVOCACY

NGOs' advocacy activities are based upon policy analysis, research, and the channeling of information. On these bases, they engage in a range of activities from awareness raising, through development education, networking, capacity building, lobbying, and campaigning to, in a few cases, direct action. The sorts of issues that NGOs advocate about range from general principles of inclusion and participation in decision making, through macro issues such as reform of the WTO, human rights, corporate responsibility, and the regulation of multinational corporations, to more specific issues such as education, debt, child labor, food security, biotechnology, and reproductive health. Many NGOs report that a tight focus on specific issues, perhaps as a way in to wider themes, is the key to successful advocacy.

NGOs' advocacy targets institutions at a variety of levels—international organizations, national governments and departments, corporations, trades unions, and other NGOs. Several interviewees argued that the selection of target groups ought to be issue driven. For such issue-driven NGOs, the key is to understand the processes through which policies are developed and then to advocate at the appropriate level or levels. Describing what goes on within his NGO, one interviewee explained that "having identified the major macro issues that we're going to work on we then go into a second phase of drawing up a strategy for each issue, which includes identifying the appropriate targets" (senior advocacy officer, medium-sized generalist NGO). In addition, NGO interviewees with long experience of advocacy reported that using a single advocacy tool or message for a range of targets was ineffective.

Approaches to advocacy—whether the NGO engages in quiet lobbying, awareness raising, or direct action—are shaped by understandings of what advocacy is, by the size and resources of the NGO, and by the issue and target group in question. Many NGOs, as well as DfID officials, value the diversity of approaches both within and between NGOs. Thirty percent of NGOs see themselves as technical specialists with a particular niche within the NGO landscape, a position that they feel lends them authority in their relations with DfID and other target groups. Whereas some of the NGOs prioritize flexibility, most of the NGOs extol the benefits of having clear advocacy strategies, even though very few NGOs have them.

POSITIONING ADVOCACY

Many staff members within NGOs do "advocacy" in its widest sense, but the explicitly named advocacy units are often made up of just a handful of staff members. In many cases, these people feel that the work of the advocacy unit is poorly understood and undervalued. A senior advocacy officer at one of the largest NGOs spoke of the unease with which her unit was regarded, saying that

> advocacy has, in the past, been regarded with some suspicion, particularly by those in programmes, that, "once you get an advocacy unit they go off, you can't control them and they're intergalactic, and they're working on issues which are nothing to do with us." (senior advocacy officer, large generalist NGO)

Questions about the legitimacy and value of advocacy work emanate from within NGOs as well as from outside, particularly in the case of NGOs that have traditionally been seen as "hands-on." As an interviewee from such an NGO put it, "There was always a sense among some people that this agency was not a campaigning organization, and advocacy was not really what we're about—'we're a hands on doing it organization' " (senior policy officer, large specialist NGO). Several of the interviewees stated that they felt, or had felt, under pressure to justify their advocacy work within their NGO. However, interviewees reported that their need to establish internal legitimacy reduced over time. One interviewee frankly stated that "I think now people have got more confidence because we've been going for a year and we haven't stuffed up yet and we've been quite useful" (senior advocacy officer, large generalist NGO).

Misunderstandings, marginalizations, and questions about the value of advocacy in some cases translate into uncertainty, lack of clarity, and tensions about the appropriate position of advocacy within NGOs. Organizationally, advocacy is variously positioned as part of policy and campaigns; closely linked with projects and programs; an off-shoot of fund-raising; and as a spin-off from education and awareness raising. Several of the interviewees mentioned tensions within their NGOs around the relationship between advocacy and marketing and profile raising. An interviewee from a specialist NGO declared that

> all the NGOs are using advocacy partly as a way of projecting the institution and profile raising. They're all doing the same. And they can't afford to lose that. So that marketing/advocacy [distinction], it's a very fine line to draw. (senior policy officer, large specialist NGO)

Other interviewees explained the importance of not having the advocacy unit and advocacy people as separate from the rest of the organization. As one interviewee put it,

> I think some NGOs are beginning to recognise that if they want to do real advocacy that there's a lot of time and energy that has to be spent on building capacity and raising the ability of people who are normally project planners and doers of things, to be able to think these things through. Otherwise you just have a caste system, where the advocacy is done by a few people. (director, large specialist NGO)

Several of the NGOs examined were reconsidering the position of advocacy and policy work, in an effort to "mainstream" advocacy. In several cases, this was about developing a closer link between programs and advocacy. An interviewee from a small NGO explained that "the principal thinking behind it is that the organization should try to come closer and should try to have greater synergy between its programme side, its operational side, and its policy work" (senior policy officer, small generalist NGO).

DIFFERENTIATION AND COLLABORATION

An important feature of the landscape of NGOs is that agencies have particular identities or niches and actively work to differentiate themselves from other NGOs. Some NGOs construct themselves in terms of their size, years of operation, and reputation (e.g., Oxfam, Christian Aid). Other NGOs differentiate themselves in terms of the ways they do advocacy and their willingness to be confrontational (e.g., World Development Movement); their technical specialism (e.g., Intermediate Technology Development Group, Water Aid); the activities they conduct (e.g., Voluntary Service Overseas); and, most commonly, the issues they advocate about (e.g., Action on Disability and Development, Banana Link, Child Hope, Consumers International, Help Age International, Save the Children Fund). Still other NGOs are differentiated in terms of who their supporters are (e.g., Catholic Fund for Overseas Development (CAFOD), Tearfund).

Such differentiation takes place for a variety of reasons. A first reason is to avoid duplication of effort and to carve out a niche as a "specialist." An interviewee from an NGO that is widely seen as a specialist, explained that

> there's plenty of people out there saying "poverty is bad." Christian Aid and Oxfam do it very well. There is no reason for us to waste our resources repeating their messages. We're not going to go out and campaign on general development issues or educate the public on general development questions, because that's not our role. (senior policy officer, large specialist NGO)

Relatedly, many NGOs feel that by being a specialist organization, they maximize their chances of being taken seriously by other development agencies. Additionally, NGOs are pushed to construct and maintain their distinctive identities because of a volatile and competitive funding environment. As an interviewee from one of the largest NGOs put it,

> I see that driven partly because of what is happening to donors and the debate about legitimacy. Because of this idea of competition . . . there is certainly pressure to define yourself in the market place. It is about having a clear identity in simple language. It is almost trying to say, "this is how we're distinct from other organizations." (policy officer, large generalist NGO)

Although differentiation contributes to a healthy diversity of NGOs and produces clear identities that can give a motivational focus to the work of staff members, it is important to remember that it can divert resources from advocacy and development work to image maintenance. As an experienced observer of the NGO world suggested, "Certainly international NGOs have almost compulsively—perhaps because of the fact that they need to raise funds—devoted a huge amount . . . of time and energy and, in some cases, resources, to profile building" (director, large generalist NGO). Differentiation may also limit the amount of cooperation that takes place between NGOs and result in unnecessary duplication of effort, particularly in terms of research and the development of ideas and methodologies.

Although NGOs work to differentiate themselves, they also appreciate the importance of working together to achieve their goals. When NGOs work together it is about two main things. First, it is about sharing information, technical expertise, research, and ideas. Second, it is about developing common advocacy positions. When NGOs work together in the sphere of advocacy, their relationships can be more or less institutionalized, ranging from "families," "alliances," and "federations" (e.g., Oxfam, Save the Children Fund, Help Age International), through temporary issue-specific consortia or coalitions (e.g., Jubilee 2000, Bretton Woods Project), to loose "networks" (e.g., UK Trade Network, UK Food Group, European Network on Debt and Development [EURODAD]). In addition, NGOs cooperate through national (British Overseas Aid Group, British Overseas NGOs for Development) or European (e.g., European Solidarity Toward Equal Parcipation of People [EUROSTEP], SOLIDAR) umbrella groups (see Fowler, 1997, chap. 5). Complementing these institutional relationships are the relationships between individuals within the NGO sector, a factor that is particularly important given the high turnover of NGO staff workers and the revolving door between many NGOs. A further and rather different institution of cooperation, if that is the right word, is subcontracting.

A first reason for NGOs to work together in their advocacy is to sort out the turf, to avoid duplication, and share the workload. A second motivation is to take advantage of the strengths or comparative advantages of different NGOs. A third, and perhaps most important reason, is the collective weight that such cooperation can provide. As well as providing greater weight to an advocacy message, when NGOs work together they can present a common front to policy makers. As one interviewee put it,

> It is quite clear that for advocacy to affect political outcomes, you need to have alliances that work, with everyone in the alliance saying more or less the same thing. Otherwise you give policy makers the choice of going with the CAFOD line or the Oxfam line or the Save the Children Fund line or whatever. (head of public policy, medium-sized generalist NGO)

Although displaying a common front is important, so too is the existence of a diversity of approaches. An interviewee from a tiny NGO argued that "you need the very radical organizations to highlight the issues, because nobody does it like they do, so you need them to start off with" (director, small specialist NGO). Regarding the subcontracting variant of working together, the motives are rather different. There are various reasons why an NGO might subcontract a piece of work, ranging from generating solidarity, to lack of expertise, and resource (both time and money) effectiveness. At the more cynical end of the spectrum, subcontracting is about exploiting the smaller NGO to get a piece of work done more cheaply.

Whereas many NGOs appreciate the benefits of working together, others see clear problems and limits. In general, these constraints are about competition between NGOs and their desire to retain their autonomy and identity. One of the most important sets of problems concerns differences in size and resources. Coming from a small NGO, one interviewee stated that "we try to [work together] in the UK, but we get the brush off sometimes. We're relatively small, so some organizations can feel that they're better off going it alone" (advocacy officer, medium-sized specialist NGO). Smaller NGOs also feel that when they do work with larger NGOs the relationship is unequal, particularly in terms of decision making, the seriousness of consultation, and the opportunities for policy input. Drawing an interesting parallel with North-South relations, a tiny NGO lamented that

> when a big organization does take it on, if they don't consult with us properly, or they work with you in such a way that they're in charge because they have the money and we don't, then there are a whole load of issues that come out about the difficulties of working with other organizations, which are really uncomfortable and not easy. There have been times during the years that I've worked here where we have worked

with larger organizations on campaign issues, where we have very much understood how it feels to be a third world country. (director, small specialist NGO)

RELATING TO DONORS

Interviewees often mentioned the importance of funding in shaping the activities and identity of NGOs. An interviewee with extensive experience in the NGO sector argued that "I think there's no doubt that whatever NGOs might say, if they're really honest, funding plays quite a big part in their whole psyche" (director, large specialist NGO). It is rare for NGOs to receive funding specifically for advocacy; rather they have to use other bits and pieces of money. A number of NGOs are beginning to ask their individual supporters to finance their advocacy, but this is a new thing. The NGOs' funding came from a variety of sources: multilateral donors (World Bank, United Nations); bilateral donors (European Union, DfID, and other countries); donations and appeals; regular donors/supporters and membership fees, including some child sponsorship (e.g., Action Aid, World Vision) and church-based groups (e.g., Christian Aid, CAFOD); trading activities; other trusts and NGOs (e.g., Agency for Cooperation and Research in Development (ACORD), Banana Link, Catholic Institute for International Relations (CIIR); the national lottery; and gifts and legacies.

Although many of the NGOs receive significant funding from DfID (see Table 2), many interviewees told me that they were, partly deliberately and partly due to an increasingly tight and competitive funding environment, receiving a smaller share of their finances from DfID. Several interviewees felt that overreliance on DfID might alter relations with DfID, adding a financial dimension to power relations between NGOs and one of their key target groups. First, financial dependence might lead to DfID calling the shots; second, it might discourage the NGO from speaking its mind.

It is often remarked that tensions may arise when an NGO receives funding from an institution that is also a target for the NGO's advocacy. For a limited number of interviewees, the dual role of DfID was clearly problematic. Most critically, contrasting his NGO with others, one interviewee complained that "We've been really struck by the sycophancy of certain large international NGOs as regards their advocacy work towards DfID. I think the reason why they've been reluctant to speak out has been because they are worried about their funding" (senior advocacy officer, large generalist NGO). Other interviewees recognized the potential problem but had no personal experience of it and doubted that it was often a real issue. For just over a third of the NGOs involved in my research, there was no tension created by DfID's being both target and donor. One NGO actually argued that funding from DfID was a positive thing for its advocacy as it gave them more opportunity to meet with, and advocate to, DfID. Of course, NGOs that do experience the donor/target

Table 2. Financial Dependence on the Department for International Development (DfID)

Nongovernmental Organization	*Percentage of Income From DfID (1997/1998 Data)*
Voluntary Service Overseas	76
Healthlink Worldwide	c. 45
Catholic Institute for International Relations	c. 44
Intermediate Technology Development Group	36
Population Concern	31
Childhope	20
Help Age International	12
Oxfam	12
Christian Aid	11
Marie Stopes International	10
International HIV/AIDS Alliance	5

tension are perhaps unlikely to disclose this in interviews. However, interviewees' responses do give some idea of the ways in which this potential tension plays itself out. Interestingly, from the DfID side of the funding relationship came the assertion that "we have genuinely never said 'Oh, that bloody [NGO name], are we giving it money? Let's stop it,' kind of thing. We would never do that, there would never be any direct connection" (senior DfID official).

There were a variety of explanations offered as to why the donor/target tension was not such a big issue as one might expect. A first set of reasons applies to those NGOs that don't receive funding for advocacy, or funding more generally, from the donor/target in question. Relatedly, other NGOs do receive funds from the target in question but they are for specific activities that are not directly related to advocacy. A second set of reasons, mentioned in terms of DfID, the European Union and the World Bank, is that the institutions are so complex that the person approving the funding would not be the person being targeted by advocacy. A third set of reasons given for the donor/target issue not being particularly problematic relates to the approach taken to advocacy. Several NGOs talked about their diplomatic approach to advocacy and felt that they could target a donor, as long as they did it in a constructive manner.

Although few NGOs felt that the donor/target issue was particularly important, this in itself does not make the issue go away. In fact, as relations between DfID, NGOs, and wider civil society are in such a period of transition the issue is likely to be of continuing importance. The possibility of tensions arising is appreciated by NGO workers, and there are some fears about (financial) dependency, the "over-cosy" relationships that some of the larger agencies are seen as having with DfID, and the implications of an emerging contract culture.

DEALING WITH ISSUES OF LEGITIMACY,
REPRESENTATION, AND ACCOUNTABILITY

As NGOs advocate about a range of issues, to a range of targets, and in a range of ways, questions of legitimacy are likely to come up in a variety of ways. For instance, NGOs advocating for a ban on landmines are in effect working with the grain of international opinion and are unlikely to be seriously questioned regarding their legitimacy. On the other hand, an NGO that is considering vocal opposition to a government's policy regarding arms exports to developing countries—and especially an NGO that receives funding from the exporting country's government—may well feel under pressure to avoid such contentious issues. It is in this sort of case that an NGO may find itself questioned regarding its legitimacy. This may suggest to some NGOs that their "legitimacy" is primarily questioned when they are challenging vested interests.

When the "legitimacy" of NGOs' advocacy is discussed, the word often stands in for issues of accountability, representation, effectiveness, credibility, authority, expertise, and comparative advantage. Legitimacy debates need clarifying and disaggregating into, at least, Legitimacy for what? Legitimacy to whom? and Legitimacy on what basis? A few interviewees did express surprise that their legitimacy wasn't challenged more, whereas others felt that legitimacy debates were little more than a Northern guilt-trip. However, although legitimacy debates are muddled, NGOs keenly feel the pressures—from target groups, Southern partners, and donors—to establish their right to express their views and to be taken seriously.

NGOs claim legitimacy for their advocacy on a variety of bases. Ten percent of the NGOs involved in the research project made modest claims that leave them less open to criticism or claim to avoid the practice of advocacy as they feel that it disempowers Southern communities. Fifteen percent of the NGOs examined stated that their legitimacy derives from, or is illustrated by, their history and institutional survival. Another 15% claimed legitimacy by arguing that the position being advocated was a basic right, was a moral or ethical principle or value, or had been agreed upon in an international code of conduct. Ten percent claimed legitimacy in terms of organizational structures—staffing, governance, and formally democratic membership structures. Fifty percent claimed legitimacy on the basis of links with the South, which provide them with expertise and experience, with only a fifth of these claiming to be "speaking for" the South. That said, rather more of the NGOs did describe what they do in terms of promoting values or interests that come out of their experience in the South. Such legitimacy claims were made forcefully by those NGOs that see themselves as specialist technical agencies.

Most NGOs see the quality of the relationship between their programs and advocacy work as crucial to their legitimacy and effectiveness, and many are actively working to improve this connection. One interviewee suggested that "the Holy Grail of all advocacy is to have an organization that has very good

operational grassroots work, and to use the experiences of that grassroots work to inform advocacy" (head of public policy, medium-sized generalist NGO). Work with Southern partner organizations is regarded as central, providing the evidence, legitimacy, and rationale for advocacy. However, NGOs do lack formal or substantive mechanisms of accountability to the intended beneficiaries for their advocacy work. NGOs are confused by questions about what they ought to be accountable for (inputs, outputs, outcomes, or impacts?); who they ought to be accountable to (trustees and board members, supporters, donors, partners, and intended beneficiaries); and how they ought to be accountable. In part, this is due to the complexity of advocacy work, involving a lengthy chain between the micro and the macro, which makes the tracing of connections of causality, responsibility, legitimacy, representation, and accountability extremely difficult (Hudson, 2000, 2001a). NGOs that were established for "hands-on" development work and the channeling of funds have not established organizational structures to ensure that they are accountable for their advocacy.

Micro-macro links are very important for the legitimacy and effectiveness of advocacy, but NGOs also argue that there are other bases for their legitimacy. In an emerging international division of labor, UK NGOs feel that they are able to add value on the basis of comparative advantages such as their skills in policy analysis and the ability to spot threats to, and opportunities for, Southern partners; access to and knowledge of Northern and international institutions; access to resources and information; experience of international policy debates; large UK constituencies; and their ability to raise awareness of international development issues in the North. Those NGOs that had consulted their Southern partners about the appropriate role of Northern NGOs had been told that they ought to take advantage of the potential benefits that their position in the North might confer.

Whereas NGOs centainly see continuing roles for themselves in international development, targeting Northern institutions and raising awareness about international development issues as part of UK civil society, but they are enthusiastically seeking to build the capacity of Southern NGOs and communities to undertake their own advocacy. Although some concern is expressed that direct funding of Southern NGOs might weaken the link between Northern NGOs' operational and advocacy work, DfID's role in strengthening Southern civil society is widely supported. An interviewee from one of the largest NGOs suggested that "if you are to address the issue of legitimacy . . . then much more effort and emphasis need to go into supporting Southern advocacy as opposed to advocacy done on behalf of Southern NGOs by Northern agencies" (advocacy officer, large generalist NGO).

EVALUATING ADVOCACY

In general, NGOs' evaluation of advocacy is very limited, with most NGOs struggling to come to grips with it. NGOs are beginning to respond to

increasing pressures to evaluate their advocacy, pressures that they see as coming from within individual NGOs, from funders, and from the wider NGO community. Several interviewees were resistant to the introduction of formal and mechanistic evaluation, but others talked of the relatively "cosy life" of advocacy units and a lack of pressure to evaluate advocacy.

NGOs consider evaluating advocacy for a variety of reasons. First, to learn to advocate more effectively next time, to develop advocacy skills and capacities, and to make more informed decisions about the allocation of resources. Second, to demonstrate the value of advocacy, both to external stakeholders and within the NGO. As one interviewee put it,

> If there is this debate about the degree to which advocacy needs to be prioritized, it's in the interests of those people arguing that it should be prioritized to be able to have good impact assessment mechanisms to show it's working. (head of Northern affairs unit, large generalist NGO)

Third, evaluation is considered a means to establishing just what it is that an NGO can be accountable for.

NGOs that certainly evaluate their advocacy tend to focus on activities/ inputs or outputs, less frequently considering outcomes, and very rarely looking at ultimate impacts on poverty (Hudson, 2001b; Roche, 1999). Evaluation activities tend to take the form of "counting the shots" (meetings held, letters written, column inches), collecting anecdotes, and recording changes in policy wording. Although NGOs are less opposed to the use of logframes than might be expected, there is some concern that their use might limit NGOs' ability to seriously involve partners in evaluation and constrain efforts to develop innovative evaluation methodologies.

The cutting edge of evaluating advocacy involves efforts to deal systematically with qualitative data and to map out the complex processes and multidimensional nature of advocacy with a view to developing indicators for different stages in the policy process and in relation to advocacy at various levels. NGOs at the forefront of evaluating advocacy recognize that the aims of evaluation and the nature of the specific advocacy campaign ought to shape the evaluation process, with some actively seeking to involve the intended beneficiaries of advocacy in their evaluation.

NGOs face a variety of problems in their efforts to evaluate advocacy, many of which stem from the fact that advocacy is such a different sort of development activity from operational activities. Outcome-related problems include the fact that advocacy tends to have multiple objectives and a lack of baseline data, the relatively intangible and long-term nature of impacts, the fact that it is not easy to know at the outset what indicators might be suitable, and the fact that targets are unlikely to acknowledge that policy change came about as a result of NGO pressure. Regarding processes, evaluating advocacy is rendered problematic because of the complex, gradual, and cumulative nature of advocacy for policy change, which makes the attribution of impact to

advocacy by a particular NGO extremely difficult. Finally, there is a paucity of methods for evaluating advocacy.

CONCLUSIONS

This article has provided an overview of the advocacy activities of UK-based development, with the intention of informing the thinking and activities of NGOs. The shift toward advocacy and a wider view of development are to be welcomed. However, as this research note has outlined, if NGOs are to become effective and legitimate advocates, they do need to consider a range of questions about how advocacy activities relate to their more traditional work. Such questions include the following:

- How can NGOs evaluate the impact of their advocacy?
- Is a shift to advocacy likely to maximize NGOs' impact?
- How can NGOs best integrate advocacy into their other development activities and clarify the relationship between their operational activities in the South and their advocacy work in the North and internationally?
- How can NGOs ensure that their advocacy—although no doubt increasing their institutional profile—contributes primarily to their developmental objectives (see Edwards, 1999, p. 264)?
- How can NGOs ensure that their relationships with donors do not compromise their independence as advocates for the poor?
- How can NGOs respond constructively to questions about their legitimacy?

If NGOs are to respond to these questions and to establish themselves as effective and legitimate advocates, they are likely to have to accept certain responsibilities as well as claiming rights (Edwards, 2000). This may involve taking the initiative to establish clearer mechanisms of accountability, building the capacities of Southern NGOs to do their own advocacy, and putting more effort into building Northern constituencies for international development (Malhotra, 2000).

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Alan Hudson is a researcher for the House of Commons Select Committee on International Development. This article was written while Alan was a research fellow at the Open University. His research—on NGOs, globalization, sovereignty and global governance—has been published in a variety of journals including Global Networks, Political Geography, *and the* Review of International Political Economy.