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BIOMETRICS: AN OPPORTUNITY OR A THREAT FOR HUMANITARIANISM?

A consideration of what has driven UNHCR to adopt biometric technology, and Oxfam to prohibit it.

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Abstract

Biometric technology is increasingly implemented in public services, such as voting, law-enforcement and healthcare. The past decade has seen the technology introduced world-wide, coupled with a nascent regulatory environments on data protection and privacy in an ever-growing digitalised society. Concurrently, concerning reports of breaches to personal data dominate the headlines, e.g.: The Yahoo Data Hack (Dec, 2016) described as the biggest breach in history with one billion user's personal data stolen.

Concerns for data security and the societal impact of a digitalisation are growing, and biometrics plays its part in the question of how far innovative technology offers opportunity or threat to society. The technology has been adopted by international humanitarian organisations (IHOs) in the registration and verification of persons in need. However, how ethical and responsible it is for an IHO to use biometrics is debated.

This explanatory study considers the IHOs of UNHCR and Oxfam, that hold opposing positions on the use of biometrics. UNHCR is currently rolling-out biometrics world-wide, while Oxfam has prohibited its use. This thesis suggests four reasons for this difference, including organisational structure, directions of accountability, funding and a political agenda. It finds directions of accountability, that is the orientation to be more upward or downward-facing and the extent to which the IHO expresses a political agenda, to hold significance influence. Internal organisational culture is also significant to decision-making. This analysis contributes to an underdeveloped crop of literature discussing governance, humanitarianism and new technology.

Contents

1. Introduction

The biometric market has grown substantially over the past two decades, with an estimated market value of US$4.3 billion today, primarily fuelled by governments and law-enforcement agencies implementing the technology for identity-card programs[1]. Over 160 countries are now using biometrics to register its citizens, including 70 low-middle income countries[2]. Identity is a core human-right enabling an individual to access essential services. Currently only 65 percent of births are registered globally, and this figure is less than half in developing regions such as sub-Saharan Africa[3]. The lack of registered identity is often cited as the single, most critical failure of development in the past thirty years[4]. Biometric technology (hereafter, *biometrics*) has been hailed as a timely, potential solution to this pressing issue[5].

The United Nations Refugee Agency (UNHCR) and Oxfam, two of the largest international humanitarian organisations (IHOs) hold opposing positions on the use of biometrics in humanitarianism. According to UNHCR, the adoption of biometrics has increased their speed and accuracy in verifying vulnerable persons[6]. It is argued to be highly cost-efficient, secure and has allowed UNHCR to reach unprecedented numbers of vulnerable populations[7]. In recent years, public trust in IHOs has declined and scepticism of aid has increased the pressure to prove legitimacy through easily-communicated results[8]. Biometrics is used to support this demand to improve accountability measures. UNHCR is currently rolling-out a biometric identification programme, aiming to have every refugee on a single registry by the end of 2019.

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[1] Global Data. 2017. *Government Biometrics Market 2017-2027*. Retrieved online.

[2] Centre for Global Development. 2019. *Biometrics FAQs*. Retrieved online.

[3] UNDP. 2015. *Why birth and death registration really are "vital" statistics for development*. Retrieved online.

[4] Ibid.

[5] Biometrics refers to the "automatic recognition of individuals based on their physiological and/or behavioural characteristics". Jain, A. K., A. Ross, & S. Prabhakar. 2004. Introduction To Biometric Recognition. *IEEE Transactions on Circuits and Systems for Video Technology*. 14 (1) p.2

[6] UNHCR. 2015a. *Biometric Identity Management System*. Retrieved online.

[7] UNHCR. 2015a. Retrieved online.

[8] O'Donnell, M. 2016. *NGO face a slow-onset funding disaster - what can be done to avoid it?* Retrieved online.

However, Oxfam has spoken out against biometrics, reflecting a growing concern by academics and human-rights activists alike that the risks of biometrics are underestimated. Issues of data-security, physical harm by biometrics and its ethical implications have been cited. The New Humanitarian suggested the humanitarian-sector has has a "tendency towards 'a shiny new toy syndrome' which values novelty and sophistication…[leading to] an excessive habit of collecting the affected populations' data"[9]. In 2015, Oxfam imposed a self-moratorium on biometric use in its work.

The possible risks implied have received little attention by observers of UNHCR. This thesis will explore the tension between the conflicting, puzzling positions presented by UNHCR and Oxfam to contribute to a wider understanding of the drivers and deterrents of adopting biometrics by IHOs. It will first study existing literature that focuses on decision-making within international organisations (IOs) to understand the broader context in which a decision to adopt or reject biometrics is made. It will propose four hypotheses and taking a qualitative, comparative-case analysis, present its findings.

[9] Parker, B. 2018. *Aid agencies rethink personal data as new EU rules loom*. The New Humanitarian. Retrieved online.

2. Literature Review & Hypotheses

A study of relevant literature indicates several drivers that influence decision-making, which helps answer why an IHO may adopt or reject biometrics. An understanding of organisational governance will be used as a conceptual framework to understand governance of IHOs. Within this context, specific drivers and deterrents of biometrics will be discussed. The review will propose four hypotheses to analyse throughout this thesis.

A. The structure of an organisation

From a classical organisational theory perspective, the study of the organisation's structure is key to understanding decision-making. A focus on internal bureaucracy and the hierarchal structure of power has been useful to question both *why* an organisation might exist and *what* it actually does[10]. As Murdoch references in his work on the European Union (EU), it is useful to combine International Relations (IR) and Public Administration (PA) approaches to understand why an IO is created, as well as an analysis of its policy-making role and bureaucracy in day-to-day working[11].

Traditionally, IOs established by state governments were perceived as purely functional mechanisms that made impersonal decisions, relying upon prescribed rules. Through this lens, functionalist accounts emphasise the exogenous effects of processes such as Globalisation to explain the growth of IOs in both size and scope[12].

PA literature of the 1990s reflected a trend that saw IOs shift towards a structure of decentralisation during this period. As Martin suggests, decentralisation posed a solution for the increasing complexity of global issues for IOs[13]. This crop of literature questioned whether decentralising authority could increase efficiency for organisations. Fowler's work

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[10] Bauer, M. & Ege, J. In (Eds.) Bauer, M. W., C., Knill, & S. Eckhard. 2016. *International Bureaucracy: Challenges and Lessons for Public Administration Research*. Palgrave Macmillan. pp.13-15

[11] Murdoch, Z. 2015. Organization Theory and the Study of European Union Institutions: Lessons and Opportunities. *Organization Studies*. Sage Publications. 36(12) pp. 2-4

[12] Rodrik, D. 2012. *The Globalization Paradox: Democracy and the Future of the World Economy*. Oxford University Press, Oxford.

[13] Martin, L. 1995. *Decentralization and Regionalization: Trends and Analysis*. UNHCR Inspection and Evaluation Service. Retrieved online.

highlights the various levels to which authority in decision-making is either concentrated or spread downwards within an organisation, e.g.: delegation or devolution[14].

From an IR perspective, decentralisation processes are central to the Principal-Agent (P-A) analysis, e.g.: Bauer & Ege discuss the connection between chains of delegation and increased autonomy for international bureaucracies[15]. Hawkins *et al* also consider delegation in-depth. They argue the *principal* (whether that be the State or an IO) would choose to delegate for two primary reasons: specialisation and policy externalities. The former because the *agent* has more expertise, time, political ability and resources than the *principal*. The latter because if there is a risk of "distasteful outcomes", it is advantageous for the *principal,* that the *agent* takes responsibility[16].

There is a suggestible link then between delegated authority in a decentralised structure and the type of decision made by organisations. Applying this theory to IHOs, it is plausible that those that demonstrate decentralisation will also display delegated authority in areas requiring expertise and/or carrying high risk, e.g.: the introduction of biometrics.

The first hypothesis proposed is:

> *UNHCR has adopted biometrics while Oxfam has prohibited it because UNHCRs structure ensures decision-making authority is delegated, while Oxfam has more concentrated authority.*

B. The performance of an organisation

PA literature has long-focused on the tension between the necessity of delegated bureaucracies to justify legitimacy, and those that have sought autonomy from the *principal* control[17]. A study of the extent to which an organisation is accountable is critical to understanding why decisions are made.

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[14] Fowler, A. (1992). *Decentralisation for international NGOs*. Development in Practice, 2(2) p.121

[15] Bauer, M. & Ege, J. (2016). p.13

[16] (Eds.) Hawkins, D. G, D. A. Lake, D. L. Nielson, & M. J Tierney. 2006. *Delegation and Agency in International Organizations*. Cambridge University Press, Cambridge. p.15

[17] Barnett, M., & M. Finnemore. 1999. *International Organization Foundation*. International Organization, 53 (4).

As Grant & Keohane highlight, there are two main types of accountability: discretionary authority and instrumental agents. The former entrusts authority to others but does not expect to direct the organisation's power, and the latter directs the action of the organisations - demanding ex-ante and ex-post evidence[18]. Applying a traditional P-A approach, it would be expected that where there is delegated authority, there would be more instrumental mechanisms to demonstrate measurable results to the *principal*, e.g.: monitoring outputs against clear success and/or failure criteria.

Regarding IHOs, they sit in a sector often suggested as ad-hoc and reactive[19]. However the likes of Read, Taithe & McGinty show IHOs to be increasingly strategic, programmatic and corporate. They argue IHOs have faced a "technocratic turn" since the 1980s with an increased demand from donors for efficiency and transparency[20]. Further, Banks & Hulme suggest that many are challenged to live up to "ascribed grassroots orientation" because they have shifted from "broader goals of empowerment" to "measurable outputs"[21].

As Jain, Ross & Prabhakar suggest, biometrics acts as a tool to enforce accountability. Improvement of accountability measures, e.g.: the digitalisation of humanitarian delivery, that shows where, who and what funds are spent on, ensures an IHO can be transparent and inclusive to its donors[22]. A United Nations (UN) executive reported biometrics "reduce[d] costs...risks of sharing refugees' data, whilst simultaneously improving...control, flexibility, and accountability"[23].

However, Sandvik, Jacobson & McDonald argue that any improvement to upward-accountability - that is, to the *principal* - is at the expense of a human-rights-based approach. They discuss the mantra to "fail fast, fail often and fail early" as often emphasised without consideration of risks in innovation. The degree to which experimentation with technologies

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[18] Grant, R. & R. O. Keohane. 2005. *Accountability and Abuses of Power in World Politics*. 99(1) p. 31.

[19] E.g.: DuBois, M., C. Wake. 2015. *The Ebola Response in West Africa*. HPG Working Paper.

[20] Read, R., B. Taithe & R. MacGinty. 2016. Data hubris? Humanitarian information systems and the mirage of technology. *Third World Quarterly*. 37(8) p.1318.

[21] Banks, N. & D. Hulme. June, 2012. *The role of NGOs and civil society in development and poverty reduction*. BPWI Working Paper 171. p.13.

[22] Jain, A. K., A. Ross, & S. Prabhakar. 2004. p.4

[23] Juskalian, R. 2018. Inside the Jordan refugee camp that runs on blockchain. *MIT Technology Review*. Retrieved online.

becomes a question of a *good* or *bad* failure, distracts from the real risk on the people the organisations are meant to serve. They draw on the biometric failures of the UNHCR over the past decade, pointing to how little critical attention has been given. Further they highlight risks including data breaches, potential abuse of vulnerable populations (either directly, or through exclusion) and the inability to deliver humanitarian aid in the case of technical failures or inaccessibility[24]. It can be argued that such risks are overlooked by IHOs that have adopted biometrics. Instead, upward-accountability to the *principal*, has been prioritised.

Therefore, the second hypothesis proposed is:

> *UNHCR has adopted biometrics while Oxfam has prohibited it because UNHCR prioritises the demonstration of upward-accountability, while Oxfam prioritises downward-accountability.*

C. Funding an organisation

A significant amount of literature suggests external stakeholders' influence - both state governments and private donors - is key to understanding decision-making. Wallace suggests current practice tends to reflect an agenda heavily set by a few key players. She argues non-governmental organisations (NGOs) have limited the level of participation for civil society - albeit perhaps unwittingly - and instead power is given to larger donors of the organisations, e.g.: state governments and businesses[25].

Bauer & Ege highlight the role of earmarked donations on donor influence. Specifically looking at IHOs, they suggest certain decisions are adopted based on external stakeholder wishes[26]. Further, the work of Read *et al* argues public-sector organisations have increasingly prioritised the language and practices of the private-sector, reinforced by the growing pressure of earmarked donations. They suggest privatised IHOs are more likely to face external pressure to implement risky, experimental innovation in humanitarian work[27]. It

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[24]Sandvik, K. B., K. L. Jacobsen, & S. M. McDonald. 2017. Do no harm: A taxonomy of the challenges of humanitarian experimentation. *International Review of the Red Cross*. p.331

[25] Wallace, T. (2009) In (Eds.) Panitch, L. & C. Leys. 2009. *The New Imperialist Challenge*. Socialist Register 2004. Pp.208-210

[26] Bauer, M. & J. Ege. In (Eds.) Bauer, M. W. et al. 2016. p.131

[27] Read, R. et al. 2016. p.1319.

appears there is a causal connection between earmarked donations, donor participation and the adoption of new technologies.

Therefore, a third hypothesis for this research is:

> *UNHCR has adopted biometrics while Oxfam has prohibited it because a higher proportion of UNHCRs funding is earmarked, while Oxfam is less controlled by earmarked funding and donor wishes.*

D. The political agenda of organisations

As Dekker & Hansén suggest, when things in the public-sector go wrong, the state government is responsible and faces public scrutiny. Consequently, the State has a substantial degree of interest and control in public agencies - either directly through governance or indirectly in establishing regulations, requesting measurements of accountability or setting annual budgets[28]. Political interest in the sphere of humanitarianism and the IHO is demonstrated in the merging of national security frameworks and humanitarian issues. As Loescher considers, the US state "generosity of asylum towards refugees from Eastern Europe was in part motivated by a desire to "roll back" or at least contain Communism"[29]. Significant literature since the 1970s has focused on the politicisation within the IHO, and how principles are not necessarily driven by need[30]. Fox has considered the "New Humanitarian" of the twenty-first century, commenting that the principle of neutrality once guided by the Humanitarian Principles is remarkably different today as NGOs play a central-role in political emergencies[31].

Sandvik *et al* suggest the digitalisation of aid-giving highlights the politicisation of humanitarianism more than ever[32]. For Gelb & Metz, biometrics contributes to the bigger

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[28] Dekker, S., & D. Hansén. 2004. Learning under pressure: The effects of politicization on organizational learning in public bureaucracies. *Journal of Public Administration Research and Theory*. 14(2) pp.211-212

[29] Loescher, G. 2001. T*he UNHCR and World Politics, A Perilous Path*. Oxford University Press, Oxford. p.7

[30] See: Slim, H. 2010, Fox, F. 2001, De Waal, A. 2010.

[31] Fox, F. 2001. New Humanitarianism: Does it provide a moral banner for the 21st Century? *Disasters*. 25(4) pp. 277-78

[32] Sandvik, K. B. et al. 2017. p.339

humanitarian mandate of the Sustainable Development Goals (SDGs)[33]. Specifically, biometrics helps fulfil Target 16.9 "to provide legal identity for all, including birth registration". A lack of birth-registration is considered a key barrier to delivering humanitarian aid and supporting longer-term development[34]. The World Bank (WB) suggests by expanding participation through digital identities, it supports people to exercise basic human rights; it has "become an effective platform for secure bank transactions, voting, accessing social services, paying utility bills, and much more"[35].

However, the likes of Prakash *et al* question whether IHOs are assessing the appropriateness of their resources in relation to their policy ambitions[36]. Technology that was once seen as an apolitical opportunity for the sector, an "unquestionable good", has led to significant, unprecedented vulnerabilities[37]. Sandvik *et al* warn that biometrics raises a critical question about adherence to the Do No Harm imperative that shapes humanitarian law. They highlight the "ethical variance" of how harm is distributed with new technologies such as biometrics, because its implementation favours certain groups "prioritized by a technology's assumptions, but also by exposing recipients of humanitarian assistance to the new harms"[38]. It appears that the quest to fulfil large, state-driven political agendas may cloud the judgment of IHOs when it comes to consideration of risky, new technologies.

Therefore the final hypothesis proposed is:

> *UNHCR has adopted biometrics while Oxfam has prohibited it because UNHCRs primary function is to represent the interests of the state, while Oxfam presents independence and impartiality.*

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[33] Gelb, A., & A. D. Metz. 2017. *Identification revolution: Can digital ID be harnessed for development?* CDG. Retrieved online.

[34] Ibid., Retrieved online.

[35] World Bank. 2016. *Digital Dividends*. WB Publications. p.28

[36] Prakash, A., A, Héritier, B, Koremenos & E, Brousseau, E. 2015. Organizational Leadership and Collective Action in International Governance: An Introduction. *Global Policy*. 6(3) p.235

[37] Sandvik, K. B. et al. 2017. p.325

[38] Ibid., p.340

3. Methodology

A. Case Selection

Applying case study theory as outlined by Creswell, this study has chosen to apply an inductive, qualitative approach to explain the cause-of-effect through an in-depth analysis of two cases[39]. UNHCR was the first and remains the largest implementer of biometrics in the humanitarian sphere. Oxfam was the first and remains the only IHO to have officially declared its prohibition of the technology. Using Mill's Method of Difference, it is apparent that despite the cases having similar conditions, the outcome differs. As Appendix 1 presents, there are several comparative characteristics of UNHCR and Oxfam, described in more detail below.

i) UNHCR

Established in 1949, UNHCR is mandated by state governments party to UN obligations and international humanitarian laws. Its main functions are to provide international protection to persons of concern including refugees, asylum-seekers and internationally displaced persons. Over the decades, its work has expanded to 134 countries, and in 2018 it was responsible for over 21 million people. Its main donors are state governments (including the EU), the private-sector and pooled funding mechanisms with IHOs.

UNHCR began piloting biometrics in 2002, arguing it would help to combat low-level fraud. It continued to deploy biometrics in various refugee camps from 2004 with the support of technology company *Microsoft*. In 2010, it officially announced its policy on biometrics and verification use, and began to apply biometrics globally. In 2012, UNHCR established its 'Innovation Service' with the objective to "better capture, facilitate, and promote innovation", with the founding supporters of the service predominantly from the private-sector[40].

ii) Oxfam

In 1942, Oxfam was founded by a group of private individuals in Oxford, Britain. Its mission is to prevent and relieve poverty, protect vulnerable people, advance development and promote human rights. Today, Oxfam is one of the largest NGOs working in humanitarianism. Between 2013- 2018, on average Oxfam reached 20,525,00 people per

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[39] Creswell, John, W. 2014. *Research Design*. Sage Publications, Inc. p.41

[40] UNHCR. (2014). Update on Innovation. Standing Committee 59th meeting.

year, across 90 countries. It is funded by public institutions including state governments, pooled funding mechanisms and private donors. It established an Innovation Team in 2014 and demonstrates some progression in innovative methods e.g.: it is currently using the Last Mile Mobile Solutions (LMMS) digital-registration platform to register new recipients of its humanitarian aid (non-biometric). However amidst increased use of biometrics by other IHOs, Oxfam announced a two-year self-imposed moratorium of biometrics in 2015. It commissioned research by think-tank The Engine Room to examine the risks, and concluded that as it stands the impact of biometrics is too risky to adopt.

B. Variables, data sources and indicators

The following section will explain data collection, indicators and limitations of each hypothesis.

Figure 1: Hypotheses

Hypothesis	Independent Variable	Data Sources	Indicator
1	Concentration of authority	Organigrams, internal surveys, internal evaluations, UN and independent audits, annual reports, second source interviews.	UNHCR: Evidence of a longer chain-of-command from HQ to CPs. Delegated decision-making authority.
			Oxfam: Evidence of concentrated authority, shorter chains-of-command and decision-making without delegation.
2	Direction of accountability	Accountability policies, Evaluation strategies, Risk-Management policies. Ex-ante and ex-post requirements.	UNHCR: demonstrates performance indicators, and innovation with new technologies. Low level of risk-management in its decision-making on innovation work.
			Oxfam: Less performance indicator/outcome-type measurements in reporting. A high level of risk-management in its decision-making processes.
3	Flexibility of funding	Financial reports, partnership reports, figures from website data, evidence of innovation.	UNHCR: Significant funding earmarked for CPs. High participation rates from state governments and private sector.
			Oxfam: Low level of earmarked funding. Diversity of donors.
4	Serving a political agenda	Mandate and mission statements. Risk-management policies. Second source interviews. Independent action from state governments.	UNHCR: Mandate and policies explicitly represent state government wishes. High proportion of donors from state governments.
			Oxfam: Low proportion of donors from state governments. Risk-management policies developed to ensure brand, identity and decision-making is impartial and politically independent.

i) **H1:** will examine the extent to which UNHCR and Oxfam present concentrated forms of authority. An analysis of internal structures and length-of-delegation in decision-making will indicate where authority and accountability sits. Sources such as organigrams, accountability and decision-making policies will be used.

ii) **H2:** will examine the direction of accountability prioritised in UNHCR and Oxfam. It is unlikely that either IHO will admit to prioritising upward-accountability, (as this implies it is not serving its mission as it should), and so there will be a focus on the scope of demonstrable forms of accountability mechanisms, e.g.: required ex-ante and ex-post evidence. To assess downward-accountability, a consideration of the IHOs relationships with partnerships and alliances will be assessed. Downward-accountability would be seen through a genuine fostering of open relationships with local NGOs and civil-society groups.

iii) **H3:** will examine to what extent earmarked donations influence decision-making by UNHCR and Oxfam. First, an analysis of annual funding concerning diversity of stakeholder and proportion of earmarked donations will be assessed from financial reports. Further, an analysis of the level of participation given to donors by the organisation.

iv) **H4:** will examine the extent to which UNCHR and Oxfam are tied to a global political agenda of state governments. An assessment of the mandate and mission statements will be used to understand how the IHO perceives the Principles of impartiality and independence. Secondly, the objectives and criteria listed in both the decision to adopt biometrics and to prohibit it will be examined to understand its relation to larger-scale goals.

4. Results

A. Hypothesis 1 finding:

UNHCR demonstrates decentralisation and consequently long chains of delegation from headquarters (HQ) to country programmes (CPs), in its functions and responsibilities. However, this does not indicate that decisions are made at arms-length of the central organisation body. In fact, the decision to adopt biometrics was made by a centralised working group before delegating to CPs. Evidence suggests the decision was made without the full knowledge of its risks and in an environment that was not encouraging of individual accountability, showing part of H1 holds.

In contrast, Oxfam displays high levels of concentrated accountability and a centralised structure. When it comes to decision-making, it demonstrates a facilitative process which involves collaborating with experts in the CPs.

In summary - H1 partly holds. However, the extent to which the authority of the 'working group' facilitates an informed-decision appears to be of greater relevance than a decentralised structure.

i) Evidence: UNHCR

An examination of UNHCRs organigrams (2002-2019) present sub-divisions within departments. Further internal surveys and evaluations (1995-2018) were examined. A UN survey (1995) reported UNHCR to be highly decentralised and regionalised in comparison to other UN agencies at this time[41].

In 2004, the UN called for its agencies to adopt a "genuine devolution of decision-making powers" in a vertical chain of command[42]. Further, UNHCRs Global Reports of 2007, 2009, 2010, 2011, 2013 state a push toward delegation of decision-making in CPs[43]. There is indication that delegation caused a dispersion, and possible weakening, of authority. A report by Wigley (2006), undertook one-hundred internal interviews across thirteen CPs and

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[41] Martin, L. 1995. pp.1-2

[42] Ortiz, E. F., Gorita, I., & Vislykh, V. (2004). *Delegation of Authority and Accountability Framework*. Part II. Joint Inspection Unit. Geneva. p.2

[43] See bibliography.

concluded the organisational culture diffused accountability, slowed action and created a high degree of internal frustfration:

> *"The volume of frameworks, guidelines and reporting requirements imposed by HQ on the field in part represents a response to concern regarding the capabilities of staff and the magnitude of the task, and exacerbates conflict and distance between HQ and the field"*[44].

An internal report by Türk & Eyster (2010) - both senior employees at UNHCR in organisational development - suggested staff assumed they had no real authority. Decisions were made in working-groups and Boards which diffused accountability in decision-making. They concluded that the culture needed to empower its staff to discharge their function and authorities properly[45].

Further, the UN Office of Internal Oversight Services (OIOS) audited its first biometric programme 'Project Profile' during the period 2002-2005. It found several concerns in the lack of individual and team responsibility, and the absence of any technical experts. The Board responsible for decisions in relation to plans, objectives and resources "was more of a platform for information sharing"[46]. An internal audit of its Biometric Identity Management System (BIMS) a decade later (2012-2016) again concluded serious failures around accountability, including:

> *1) The Project Manager did not request project reviews (of previous pilots using BIMS).*
>
> *2) UNHCR established an ICT Governance Board and a Project Steering Committee to oversee the implementation of a biometrics system. However, the discussions and decisions of the Board and the Committee were not always sufficiently documented.*

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[44] Wigley, B. 2006. *The state of UNHCR's organization culture*. UNHCR Evaluation and Policy Analysis Unit. p.3

[45] Türk, V. & E. Eyster. 2010. *Strengthening UNHCR's System of Accountability*. UNHCR. p.6

[46] UN OIOS. 2006. In Lodinová, A. 2016. Application of biometrics as a means of refugee registration: focusing on UNHCR's strategy. *Development, Environment and Foresight* 2(2). p.91

3) No communication plan was implemented throughout the project. All five country operations reviewed during the audit referred to lack of awareness of BIMS objectives, targets and project status.

4) The annual planning exercises of country operations and BIMS deployments were implemented independently, and as a result, did not ensure proper budgeting, timely planning, and adequate allocation of resources[47].

It appears that despite its push for a decentralised structure, decision-making remained within a working-group that (a) did not work directly in CPs; (b) did not have technical expertise and; (c) were working in an organisational culture with reported low-levels of individual accountability.

ii) Evidence: Oxfam

Oxfam presents a centralised, single-management structure (SMS). This is exemplified by the establishment of Oxfam International in 1995 by a group of Oxfam NGOs signing to address issues together under one constitution. Evidence that it has concentrated its authority through its SMS was addressed again in 2010 when Oxfam launched a 'Becoming One Oxfam' initiative. In its annual accountability report (2011), the organisation reported:

"one Oxfam will now be in charge of a single strategy for each country that we work in. Each country-specific strategy will define our combined long-term development programming with partners, and our campaigning agenda, and our crisis emergency response"[48].

Within this report, it launched its Programme Standards Self-Assessment that all CPs complete every two- four years. A report in 2014 suggested 62 percent of CPs had completed the self-assessment. Although when questioned on how far staff felt CPs were aligned to the initiative, majority of answers indicated cautiousness - neither a strong or weak

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[47] UNHCR. *Standing Committee Meeting* 67th Meeting. Retrieved online.

[48] Oxfam. 2011. *Oxfam GB Accountability Report*. p.20

response[49]. There are however, more top-line indicators of Oxfam's concentrated way-of-working, e.g.: 2012 Global Brand Identity guidelines, 2013 Strategic Plan and 2014 Oxfam 2020 vision launch. Information on the latest changes to "simplify and streamline our ways of working" by 2020 are also noted in the Induction Pack (2014)[50].

However, Oxfam's centralisation does not seem to correlate with a concentrated form of decision-making authority. Oxfam's Accountability Policies indicate with decisions regarding policymaking, it is a consultative process involving all affiliates and expert Oxfam project teams. Despite a more centralised organisational structure, it appears that with regards to decision-making, it reaches out to a range of teams world-wide to produce an informed response. Each Oxfam affiliate has a designated sign-off person who must provide a system of checks and balances suggesting strong (albeit slow) accountable procedures in decision-making[51]. Further, Oxfam demonstrates high levels of risk-management and risk-aversion. An examination of its published internal and external policies shows over ten significant pieces of research on risk since 2000[52].

B. Hypothesis 2 finding:

UNHCR demonstrates significant upward-accountability measures for donors such as its member state governments. Firstly this is obvious from its inherent make-up as an *agent* of the *principal* state. Various evaluation mechanisms have shown the demand for measured outcomes, and it presents evidence-based and measured results. Additionally, there is some suggestion that internal organisational culture perceives its prioritisation to be upwards-facing.

In contrast, Oxfam mostly demonstrates a prioritisation of downward-accountability. It often criticises other IHOs for adhering to experimental, outcome-based indicators. The human-rights-based approach is emphasised heavily in many of Oxfam's sources and appears more frequently in its publications than UNHCR.

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[49] Rocha, J. 2014. *Improving Program Quality in International Development: Lessons from Oxfam's Program Standards Self-Assessment Year 1 main report*. Oxfam. p.12

[50] Oxfam. 2014a. *Oxfam 2020 Induction Pack*. Retrieved online.

[51] Oxfam. 2006, 2012. *Oxfam International Board Accountability Policies*. Retrieved online.

[52] See bibliography.

In summary, H2 holds but could be researched further to establish whether it is decisive. It appears that a driver to adopt biometrics for UNHCR is the improvement in oversight of projects. It is evident it prioritises upward-accountability suggesting the causal connection. It is apparent that Oxfam prioritises downward-accountability, and as the literature review suggested the benefits offered by biometrics do not outweigh the risks from a human-rights perspective. Further exploration, through interviews of staff could be useful to establish the extent to which downward-accountability played a part in Oxfam's decision.

i) Evidence: UNHCR

In 2008, UNHCR introduced a Results-Based Management system (RBM) and computer software, *Focus* for the purpose of monitoring and analysing trends as well as performance and impact assessments[53]. Türk & Eyster commented "Focus enables staff to relate their individual objectives and outputs with those of the operation in which they work"[54]. UNHCR continued to roll-out RBM, as evidenced in their integration of *Focus* in Programme and Analysis Support in 2011, the Global Strategy Plan 2012-3 and the Update on Global Strategic Priorities 2015.

The extent to which performance measurements are used for upward-accountability purposes is as expected, less explicit in evidence. Although, an interviewee in Wigley's report commented:

> *"Donors permanently require reports; it becomes a reporting organization for these reasons. It's an ongoing story and it's paralysing"*[55].

Additionally, the UN Organizational Integrity Survey (2004) and a commissioned research paper (2010), confirmed the nature of cooperation within the organisation is "mainly upwards

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[53] UNHCR. 2010. *Measure for measure: A field-based snapshot of the implementation of results based management in UNHCR*. PDES. Retrieved online.

[54] Türk, V. & E. Eyster. 2010. p.9

[55] Wigley, B. 2006. p.19

because of the importance placed on securing superiors' recognition"[56]. Furthermore, a report by the Multilateral Organisation Performance Assessment Network (2014) suggested that its "corporate results" needed to be more aligned to the strategic framework, suggesting that UNHCR collected information primarily for the donor[57].

The Global Compact Report (2016) references the need for "Reliable, comparable, and timely data" as it "will assist in the development of policies, investments and programmes"[58]. Further, the OIOS internal audit of BIMS (2016) outlined three main objectives for implementing biometrics: a) strengthen controls over project reviews; b) enhance oversight over key project decisions; and c) strengthen the benefits realisation review of ICT projects[59]. There is no explicit acknowledgement of ex-ante or ex-post agreements with hierarchal superiors, however it is assumed - as H4 will explore - that this is part of its function because of its inherent make-up, e.g.: the 1951 Convention Relating to the Status of Refugees indicates UNHCR "is charged with the task of supervising international conventions providing for the protection of refugees". It is then implied upward-accountability measures would be required in order to cooperate with states successfully.

ii) Evidence: Oxfam

Oxfam appears to have more diversity in its type of stakeholder than UNHCR - or at least prefers to highlight this more frequently in its reporting. Its Annual Report (2010) notes that 46 percent of its partners are non-funding, e..g: regulatory bodies and partnered NGOs[60], whereas there is no available figure for UNHCR for this category[61]. It launched its 'Working with Others, Partnership Policy' (2007), which outlined the rights and obligations of partners, decision-making responsibilities and accountability to all stakeholders"[62]. Further, Oxfam co-

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[56] Gottwald, M. 2010. *Competing in the humanitarian marketplace: UNHCR's organizational culture and decision-making processes*. Research Paper No. 190. UNHCR DIPS. Geneva. Retrieved online.

[57] MOPAN. 2014. *Assessment: UN High Commissioner for Refugees*. Retrieved online.

[58] UN Global Compact. 2018. *The UN Global Compact Final Draft, June 2018*. Retrieved online.

[59] UNHCR. *Standing Committee Meeting* 67th Meeting. Retrieved online.

[60] Oxfam. 2010, Oxfam Annual Report, 2010-2011. pp.10-12. Retrieved online.

[61] This is not to say that UNHCR does not work with non-funding partners, however reports highlight non-funding stakeholders as those NGOs or individuals that it gives money to, rather than works alongside.

[62] Oxfam. 2007. *Working with others, Oxfam GB Partnership Policy*. Retrieved online.

founded the NGOs' Accountability Charter in 2005 with other independent INGOs, which claims to ensure accountability for a range of stakeholders from "Peoples, including future generations, whose rights we seek to protect and advance" to "Ecosystems… the media… the general public" among others[63].

There is a strong push of the human rights-based, 'downward-accountability' direction evident in many sources, e.g.: most recently, the Feedback Evaluation Projects in Jordanian refugee camps (2015-6), its Resilience Framework Guide (2016) and calls for pro-poor outcomes in briefing papers (July 2019)[64].

Oxfam introduced a Global Performance Framework (GPF) in 2011. During the design of the GPF, a global outcome indicator approach was rejected because there was concern that requiring all Oxfam CPs to achieve a pre-set global outcome had the potential to distort programme design. Hughes and Hutchings, senior Oxfam researchers, suggest that despite "escalating debates on aid effectiveness…simply observing positive change in an outcome indicator… is insufficient to evidence that this intervention, in particular, was responsible for causing the change"[65]. They advised that Oxfam was not a "development lab" and could not use defining core impact and outcome indicators to measure specific improvements. Ultimately, they conclude:

> *"we can also be more effective if we pursue interventions whose effectiveness has already been demonstrated and, conversely, stay away from those whose effectiveness is suspect"*[66].

It would appear that firstly Oxfam have steered away from experimental forms of evaluation and measurable outcome reporting. This has, in turn, contributed to a risk-averse position.

It should be considered, there are also examples of extreme poor conduct and a lack of downward-accountability within Oxfam e.g.: sex abuse claims in Haiti (2011) which were covered extensively by the media in 2018. These have subsequently led to a large fall in the

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[63] Accountable Now. Dec, 20. 2005. I*NGO Accountability Charter.* Retrieved online.

[64] See bibliography.

[65] Hughes, K., & C. Hutchings, C. 2011. *Can we obtain the required rigour without randomisation? Oxfam GB's non-experimental Global Performance Framework*. 3ie. Working Paper 13. p.3

[66] Ibid., p.12

legitimacy and reputation of the 'grassroots' IHO[67]. An external inquiry (2019) found "Oxfam GB's handling of these matters was influenced by a desire to protect Oxfam GB's reputation, and to protect donor and stakeholder relationships"[68]. It would seem even the most human rights-based organisation is still challenged to retain a consistent downward-accountable reputation.

C. Hypothesis 3 finding:

UNHCR shows a high level of earmarked funding from state government and private donors. Analysis has built on evidence already suggesting strong state government influence (H2 and H4). It has also highlighted the pursuance of private interests in biometrics by private donors. Oxfam has shown similar results with an increasing amount of earmarked funding. Although it has tested innovative methods in its work, it ultimately takes a risk-averse position. In summary, H3 cannot hold because both cases show increased levels of earmarked funding yet UNHCR adopted biometrics and Oxfam prohibited it.

i) Evidence: UNHCR

The largest proportion of UNHCRs income is donated from state governments. Within this group, ten donors contribute 75 percent of all contributions. This level of contribution has been consistent from 2006-2018[69]. In the past two decades, there has been increasing interest in donors becoming more actively involved in the planning, objective-setting and budgeting of UNHCRs work - as touched upon in H2. The Global Appeal (2001) noted increased proximity of donors to humanitarian operations and decision-making, with donors seeking to control operations. At the time, UNHCR reported it "welcomed this trend as a means to garner more solid support for its budget"[70].

Wigley's report suggested that funding from state governments did not reflect equitable need, but rather operations in countries with particularly high currency[71]. Further, an evaluation of

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[67] See: The Guardian. Feb, 2018. BBC June, 2019. Retrieved online.

[68] Charity Commission for England and Wales. (2019). *Inquiry Report: Summary Findings and Conclusions Oxfam*. Retrieved online. p.10

[69] UNHCR. 2017. *Global Appeal,* 2018. p.41

[70] UNHCR. 2000. *Global Appeal 2001*. p.16

[71] Wigley, B. 2006. p.82

RBM (2010) concluded UNHCRs accountability resources were too dependent on the level of donor interest in the operation.[72]

Private-sector income has also grown during this period. The 2003 Global Appeal notes the launch of UNHCR 'Private Sector and Public Affairs Service' as a strategic move to diversify its sources of funding[73]. By 2005, the amount of funding from private donors increased to 20 percent of overall annual income, which has been sustained since[74]. Interest in refugee issues and UNHCRs work is generally correlated with an increase in funding from this group, e.g.: 2015 European Refugee Crisis[75]. 'Leadership Giving' (LG), ie: larger contributions from foundations, corporations and philanthropists, is most relevant to the causal connection between earmarked funds and donor influence[76]. As Figure 2 shows, from 2006-2016, LG increased significantly. LG is often tightly-earmarked to the thematic or geographic priorities of the partner making the contribution. Currently, UNHCR counts on only 30 percent of this income being 'planned', i,e.: unearmarked[77].

Figure 2

UNHCR private sector income 2006-2016, in millions of US$

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016*
Individual giving	16	21	23	32	46	65	77	111	137	194	200
Leadership giving	6	13	25	19	27	46	53	80	71	90	110
Total income	**22**	**34**	**48**	**51**	**73**	**111**	**130**	**191**	**208**	**284**	**310**

* 2016 forecast

Source: UNHCR, 2016, p.5.

[72] UNHCR. 2010. p.11

[73] UNHCR. 2002. *Global Appeal 2003*. p.25.

[74] UNHCR. 2004. *Global Appeal 2005*. p.23

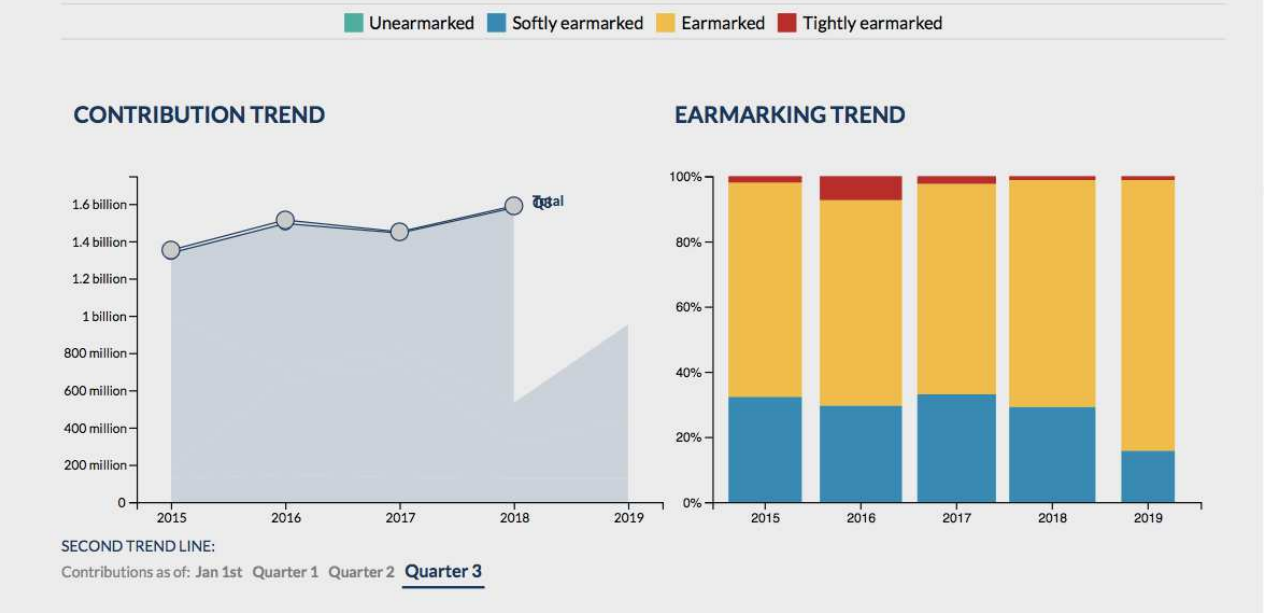
[75] UNHRC. 2016. *Private sector fundraising and partnerships*. p.4

[76] Individual Giving refers to small donations from individuals reached by face-to-face fundraising, digital outreach etc. This has been excluded from analysis because it is largely unearmarked and does not require a detailed level of financial accountability that is seen with Leadership Giving.

[77] UNHRC. 2016. p.5

Unfortunately, the data on the proportion of earmarked donations within private and public investors as separate categories is not publicly available. However, overall, earmarked funding has significantly increased. As Figure 3 demonstrates the highest proportion of annual income for UNHCR is earmarked - and growing year-on-year.

Figure 3



Source: (refworld.org)

There is evidence that closer alignment to donors comes hand-in-hand with a push for innovation, especially regarding new technologies. In 2012, UNHCR established its Innovation Service funded by private donors such as IKEA foundation and Hewlett-Packard[78]. In its latest report, the service suggests "there's no innovation without experimentation", and commenting on UNHCRs strategic move to incorporate experimentation into innovation processes[79]. The report summarises:

> *"We shouldn't be afraid of experiments as they help us gather necessary information and thus, to become more certain…you experience temporary mini-failures that provide you with a lot of information and thus, help you to avoid making significant*

[78] UNHCR. 2016. pp.5-6

[79] UNHCR Innovation Service. 2017. *Year in Review 2017*. Retrieved online.

failures that could get your (untested) projects failing disastrously."[80].

UNHCR has held a long-term relationship with software company *Microsoft* since 1999. Aforementioned, it has been involved in the adoption and implementation of biometric programmes through funding and donations of software[81]. Although *Microsoft* has often been criticised for overlooking its human rights obligations in order to tap into business markets[82]. Further, an examination of the private company *IrisGuard* which works with *Microsoft* to implement the biometric technology in UNHCRs BIMS, flags potential private interests and motives. Richard Dearlove - former director of MI6, and Frances Townsend ex-US government Internal Security and Homeland Security Advisor (2004-2008) sit on the supervisory board[83]. The involvement of such individuals in the core operation of UNHCRs CPs is interesting, and could suggest alternative agendas.

ii) Evidence: Oxfam

A study of its financial accounts since 2002 show two groups of donors: voluntary (public donations, fundraising events etc) and governmental institutions (EU, state governments etc). The Statements of Financial Activities available in the annual reports (2002 - 2014) present the split in income between these two groups, and whether the funds are earmarked for specific operations[84]. Data plotted from these statements - Figure 4 indicates - shows earmarked income has grown and at a faster rate than unearmarked income.

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[80] Ibid.

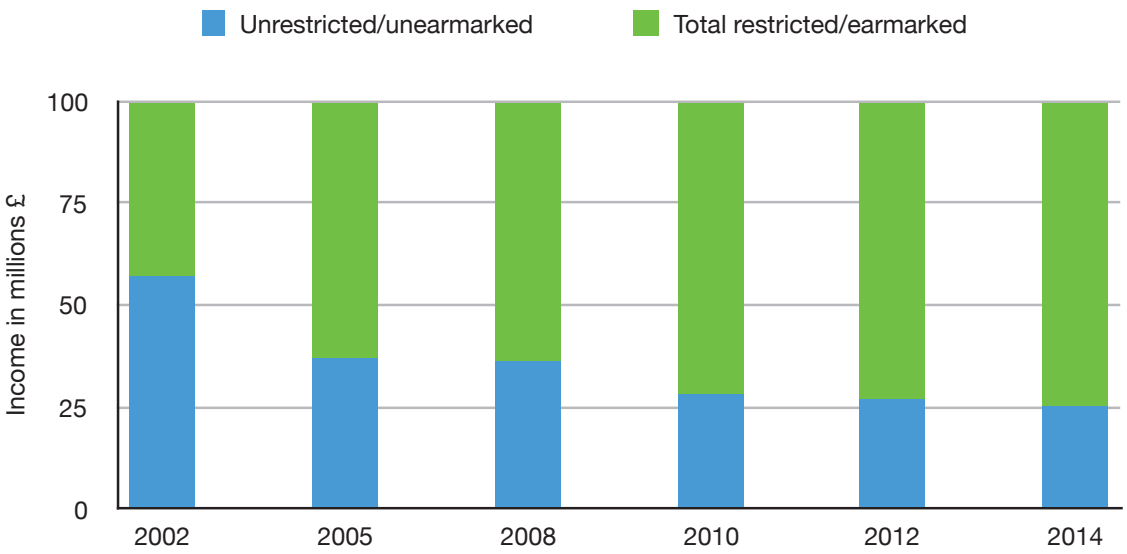
[81] Lodinová, A. 2016. p.93

[82] Helen Deresky. 2014. *International Management: Managing Across Borders and Cultures, Text and Cases*. 9th Edition. Pearson p.66.

[83] De Zeit & UNHCR blogs. December, 2017. *Tested on millions Non-volunteers*. English Version. Retrieved online.

[84] See bibliography

Figure 4



Source: Data plotted from Financial Statements, 2019.

A high level of earmarked income indicates Oxfam's budget is controlled by external donors, suggesting H3 does not hold. There is some evidence that Oxfam has attempted to work in more of a progressive, innovative fashion to be marketable to audiences, e.g: Its Innovation Lab launch (2014)[85]. However an examination of its policy papers available between 2000-19 concerning innovation, technology and ICT show Oxfam tends to assert a risk-averse position[86]. In 2018, Kondakhchyan & Eldon -policymakers at Oxfam - published a paper on the introduction of ICT into humanitarian settings. They argue ICTs can only ever "act as an enabler", and laid out some of the following principles for Oxfam's ICT use:

1. *ICTs are not an end in themselves, but need to be integrated into existing programmes.*

2. *…We will avoid bespoke solutions, but utilize common, existing tried and tested solutions.*

[85] Oxfam. 2014c. *Oxfam Innovation Lab*. Retrieved online. p.2

[86] Oxfam. N/D. *Policy and Practice. Results for Risk*. Retrieved online.

3. *Keep the technology simple: Low-tech or 'appropriate' solutions tend to reduce costs, improve reliability, and are easier to source and frequently easier to use*[87].

D. Hypothesis 4 Finding:

UNHCR has shown its mandate is aligned with state interests and global goals such as the SDGs. It is evident that the adoption of biometrics had clear purpose to contribute to a global objective, created and supported by state governments. In contrast, Oxfam purposefully brands itself as independent and impartial unrepresentative of states, removing this driver to adopt biometrics.

In summary, H4 mostly holds. The wider interests of states are represented through UNHCR and this influenced the decision to adopt biometrics. However, there needs to be further exploration on why the concept of independence has steered Oxfam towards a risk-averse position.

i) Evidence: UNHCR

A key element of UNHCRs mandate is the protection for persons within its responsibility. To achieve this, it is responsible for the Refugee Status Determination programme, supporting people to realise their rights under international law[88]. The right to identity has appeared in many documents that are aligned with this mandate, including Article 6 of the UN Declaration of Human Rights and the SDG 16.9[89]. Its latest Global Trends paper (2018) states the refugees UNHCR is now responsible for has doubled since 2012[90]. Further, at the 54th Standing Committee Meeting (2012), the need to continue mapping stateless populations was highlighted as critical[91].

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[87] Eldon, L. & A. Kondakhchyan. 2018. *Introducing Information Communication Technologies into Humanitarian Programming*. Oxfam Discussion Papers. Retrieved online.

[88] UNHCR. (N/D). *RSD*. Retrieved online.

[89] See bibliography

[90] UNHCR. 2018. *Global Trends 2018*. Retrieved online. p.4

[91] Türk, V. June, 2012. *Introductory Statement. 54th Meeting of the Standing Committee Meeting*. UNHCR. Retrieved online.

There is demonstrable evidence that the adoption of biometrics is in the interest of states that mandated UNHCR to carry out duties of protection. The aforementioned objective to improve mapping of stateless populations is referenced in the Internal Audit (2016-17) that focused on the implementation of BIMS, and again in the Global Programmes Report (2018). Both highlight how BIMS contributes to "overall savings in assistance and assurance that assistance is channelled and provided to legitimate beneficiaries"[92]. As the WB has highlighted, SDG 16.9 is a key attainment to achieving many other SDGs, and its main indicator is the number of birth registrations - also a top measurable indicator for the BIMS project[93]. UNHCRs website for the BIMS technology describes:

> *"the ultimate objective…is to empower refugees and other forcibly displaced persons: A recognized identity and close inter-operability with State population registries and CRVS systems will go a long way in ensuring inclusion into socio-economic life….including Goal 16 containing the target on providing legal identity for all, including birth registration"* [94].

ii) Evidence: Oxfam

In 2013, Oxfam published its thoughts on the Millennium Development Goals, and proposed SDGs. The framework highlighted the prime responsibility of these goals should be the State. It flagged existing accountability mechanisms were inadequate and stronger ones were needed to hold governments accountable. Finally, it recommended a new stand-alone goal of Risk, and notably did not discuss concerns around identity or protection[95].

With regards to their independence from states, Oxfam claims it complies with the Principles of independence and impartiality. Its Program Standards emphasise its collaborative work with community-based organisations and NGOs, and specifically states it will rely upon partners that are autonomous, independent and accountable[96]. It could even be argued that

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[92] UNHCR. Sept, 2018. *Update on Global Programmes. 69th Standing Committee Meeting*. Retrieved online.

[93] World Bank. 2016. *Identification for Development, Strategic Framework*. p.4

[94] UNHCR. N/D. *PRIMES*. Retrieved online.

[95] Oxfam. 2013. *Post-2015 Development Goals: Oxfam International Position*. Retrieved online. pp.1-15

[96] Oxfam. 2011. *Program Standards at Oxfam: Working Towards an Agreed Set of Standards Across Oxfam*. Oxfam SMS Tool Kit. Version 2.1. Retrieved online. pp.3-4

Oxfam is not an *agent* of state interests, but an influence on the state. Its campaigning work across the past two decades, such as the Campaign Against the Arms Trade and the Make Poverty History campaign had notable successes in changing state law[97]. It regularly comments, condemns and praises organisations and state initiatives, e.g.: reactions to Summits, G20 meetings, UN security resolutions, are found on publicly on their website.

[97] See bibliography

5. Conclusion

Through an analysis of UNHCR and Oxfam, this thesis has examined the driving and deterring forces behind why IHOs would choose to adopt biometrics and why they might prohibit it. This thesis suggested four key reasons behind the decision: organisational structure, directions of organisational accountability, funding and the political agenda.

As results have shown, the need to establish a strong reputation and sustain a level of legitimacy externally, plays a significant role in decisions made by an IHO. Both UNHCR and Oxfam chose to defend their core, most important values, as an upward-facing agent of state interests and a downward-facing, grassroots NGO, respectively. In future research, it would be useful to study the member state governments' use of biometrics in other state capacities to enhance the understanding of their external influence on UNHCR.

The second biggest factor determined in this thesis, is the importance of internal organisational culture. UNHCR and Oxfam differ on their expression of risk-management and accountability measures which impacts the way certain decisions are made. The decision to adopt biometrics appears to have been made without technical expertise, and in an environment that was not encouraging of individual or team accountability. Whereas Oxfam's decisions might be made with more 'informed' knowledge, they also tend to side on the side of caution and risk-aversion. Further research to explore what makes this organisation risk-averse would be a useful next step in this area of research, e.g.: the theory of path dependency could be interesting to consider.

As this exploratory study has indicated, the use of biometrics in the field of humanitarianism is both an opportunity and a threat. In a digitalised society, with the current advancements in data science and big data, the question of why an IHO would adopt biometrics is likely to (and should) be expanded to *how* an IHO can do so ethically and responsibly.

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Appendix 1: Method of Difference (part 1 of 2)

	UNHCR	Oxfam	Similar?	
Type of organisation	Multilateral intergovernmental international organisation (IGOs)	Non-Governmental international organisation	Both count as International Humanitarian Organisations	YES
History	Established 1949	Established 1942	Both have been around at least fifty years	YES
Mandate	*UNHCR is primarily mandated to provide international protection and humanitarian assistance,1 and to seek permanent solutions for persons within its core mandate responsibilities.*	*Our vision is a just world without poverty. We want a world where people are valued and treated equally, enjoy their rights as full citizens, and can influence decisions affecting their lives.*	Both provide assistance in response to humanitarian relief efforts. Primary objective to alleviate suffering	YES
Main functions	Protection and safeguarding work	Protection and safeguarding work	Both do this	YES
	Campaigning and advocacy	Campaigning and advocacy	Both do this	YES
	Humanitarian action	Humanitarian action	Both do this	YES
People	Refugees, Internally Displaced Persons (IDPs), Asylum Seekers and people of concern.	Anyone facing or vulnerable to poverty.	Both work with the objective to help those who are suffering, and requiring humanitarian assistance	YES
Size of mission				
Countries each works in	134 countries (2019)	90 countries (2019)	Both work with significant and substantial number of countries.	YES
Size of population each is responsible for (annually)	20.4million (2019)	22.2 million (2017-8)	Both work with similar number of people per year.	YES

Appendix 1: Method of Difference (Part 2 of 2)

Funding	Approx. US $671 million (Dec, 2018)	Approx. US $34, 594 million (Dec, 2018)		
Funded by state government institutions (inc. EU).	86% funded (2019)	49% (2018)	Both receive funding from state governments.	YES
Funded by private donors	10% funded (2019)	23% (2018) - Donations and legacies	Both receive funding from private donors.	YES
Other (pooled funding, IGOs, trade etc)	4 % (2019)	28 % (2018) - Trade, Gifts in Kind, DEC appeal income	Both receive funding from other sources.	YES
Politics	"Non-political and humanitarian" - Mandate	"Non political" - although there are many implicating sources suggesting they are left-leaning.	Both claim to be non-political, impartial and independent	YES
Demonstrates innovation	Innovation team set up in 2012	Innovation team set up in 2009	Both have shown interest in innovation in humanitarianism	YES
OUTCOME: Have adopted biometrics	Yes	No	UNHCR has adopted biometrics while Oxfam has not.	NO