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NGO Accountability and Power Dynamics in Safeguarding:

The Core Humanitarian Standard in Theory and Practice

in Refugee Camps in Sudan

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For humanitarian aid workers

Abstract

The heightened exposure of sexual exploitation and abuse (SEA) by aid workers in 2018 resulted in watershed moment for the aid sector, in particular regarding accountability toward affected populations. Despite extensive efforts by aid providers, including establishing a range of complaint mechanisms, abuse continues and remains under-reported, leaving victims to suffer in silence. This thesis investigates NGO accountability and safeguarding failures in the humanitarian aid sector. It does so by focusing on the Core Humanitarian Standard of Quality and Accountability (CHS) and applying this to the case study of refugee camps in Sudan.

The thesis draws on in-depth qualitative research in two stages. Employing a "What's the problem represented to be?" approach, this research first deconstructs the CHS using 42 interviews and review of 128 documents to analyse how accountability is conceptualized and framed within the Standard. It identifies a conceptual gap in the CHS, particularly in its framing of accountability and its failure to recognise and address power imbalances. Secondly, a case study of refugee camps in Sudan is developed to examine the implementation of complaint mechanisms and inter-agency coordination within the displacement context. Through 63 in-depth interviews and 7 months of follow-up correspondence, the thesis exposes the widespread SEA committed by multiple types of stakeholders and analyses dynamics of power across spaces, levels, and forms using Gaventa's powercube approach. It also explores the responses of aid providers to encourage refugee populations to come forward with SEA concerns.

This research identifies gaps in current complaint mechanisms and argues that, although CHS has played a role in reinforcing policy development, a lack of explicit actionable indicators on power imbalance in the Standard has contributed to its limited ability to transform the 'closed' space of power to a 'claimed' one. Leveraging my distinctive positionality as an insider practitioner-researcher, the thesis goes beyond providing academic insights to offer actionable, practical recommendations to enhance NGO accountability, contributing to a safer aid sector.

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It is with deepest gratitude that I dedicate this endeavour not only to my family but also to the resilient individuals who have bravely shared their personal experiences with me: the world needs a system that hold every aid worker accountable for their actions and behaviours. I will continue to pursue this journey post-PhD.

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Acronyms and Abbreviations

AAP	Accountability to Affected Populations
CHS	Core Humanitarian Standard of Quality and Accountability
CHSA	CHS Alliance
COR	Commissioners of Refugees Sudan
HAP	Humanitarian Accountability Partnership
HQAI	Humanitarian Quality Assurance Initiatives
IASC	Inter-Agency Standing Committee
NGO	Non-Governmental Organisation
PSEA	Prevention of Sexual Exploitation and Abuse
SEA	Sexual Exploitation and Abuse
SCHR	Steering Committee for Humanitarian Response
FCDO	Foreign, Commonwealth & Development Office
UN	United Nations
UNHCR	United Nations High Commissioner for Refugees
UNOCHA	United Nations Office for the Coordination of Humanitarian Affairs

Chapter 1. Introduction - Doing harm in the name of doing good

1.1. NGO accountability failures in safeguarding

> *"Expatriate A has been threatening me in an aggressive and humiliating manner … I don't know where to ask for help …" (a local female aid worker).*[1]

I heard this during a phone call from the humanitarian response team on the ground three months after the onset of 9.0-magnitude earthquake in Latin America more than a decade ago. Sitting at the headquarters of a medium-sized international non-governmental organisation, I remember this moment vividly with an overwhelming sense of shock and frustration, on the one hand, and increasing sense of responsibility to protect this individual, on the other. At that time, a robbery case in which a local gang broke into the organisation's warehouse to steal tents had already occupied my mental space. Needs assessment from the week before indicated the desperate situation of populations affected by earthquake, with pictures of destroyed houses and piles of rubble on the roads. The subsequent conversations I had with the local aid worker led her to disclose that she was sexually abused by an expatriate, and this led to investigation. The case was swiftly reported to the Charity Commission by my organisation.

Two months later, another suspected case of sexual exploitation surfaced within the wider humanitarian response. At that time, I was based in the field to manage the emergency response operation. For three months, my daily tasks involved going to the field, conducting needs assessment to design projects, distributing life-saving items, and implementing emergency interventions at camps. Upon my visit to the camp, as I walked across the zone allocated to another NGO to get to my vehicle, I encountered a young female resident standing by the communal latrine, looking down with a sense of sadness. In my interactions with her at that time and engagement that followed as I returned to the camp daily, signs of abuse and exploitation were identified. I contacted the NGO responsible within the zone and shared my concerns, and initial acknowledgement was received. However, as my deployment ended and I left the

[1] Details cut out due to confidentiality

country, no further communication was received from the NGO despite two further follow up emails from me. It is still unclear if the NGO took appropriate actions to provide her with support.

A decade later in 2018, *The Times* newspaper published a front-page article under the headline: "Top Oxfam staff paid Haiti survivors for sex" (O'Neill 2018). The wave of major sex scandals quickly extended to World Health Organisation, Save the Children, the Catholic Fund for Overseas Development, World Vision, Caritas International, the International Committee of the Red Cross, Plan International, and Mercy Corps (Clark 2021). At the personal level, my memories of actual and suspected sexual exploitation and abuse witnessed in the field stirred my emotions. Reflecting from historical scandals back in 2002 in West Africa to contemporary ones, I was left with disappointment and frustration that nothing seemed to have improved since the SEA incident I witnessed a decade ago, rather the extent of the problem appears to be widespread.

Amid turmoil of severe scrutiny on safeguarding in 2018, as an accountability lead at an international NGO, I conducted a regional training on the humanitarian accountability standard in East Africa. Four months later, as part of a monitoring visit I visited the field and interviewed a group of female community members in East Africa. To my question concerning if and how they felt respected by NGO workers and if they knew how they could report their concerns, a mother with three children responded as below:

> *"Yes, I feel safe and respected by aid workers. More and more, I know I can ask them for help if I'm not happy about something with the projects. NGO recently met with us and asked us how we want to complain. I said I trust my group leader (of the project funded by the NGO) and like to talk on WhatsApp. Since then, NGO set up a number I can call via WhatsApp if I want, and I can also share my complaints through my leader" (Author's journal 2019).*

My conversation with her revealed her recent experience of reporting concerns and the timely response from the NGO. A similar sentiment was repeated across the different communities I visited. As I shared this observation with the country teams, they commented on effective application of Core Humanitarian Standard of Quality and Accountability (CHS) as one reason for this improvement. This provided a

moment of reassurance that NGOs can be held accountable through appropriate application of accountability with the guidance of the standard.

As the aid sector continued to face heightened global scrutiny, my professional experience in delivery of training on the accountability standard and direct engagements with affected populations, coupled with validation of progress from the annual CHS audit, proved to me the effectiveness of the standard in enhancing downward accountability.

1.2. NGO accountability in safeguarding

1.2.1. Shortcomings of downward accountability

Claimed by the accountability scholar Clark as "the greatest international scandal to affect the aid sector" (2021: 231), mushrooming exposure of sexual exploitation and abuse (SEA) in 2018 has exposed systematic failure of the aid sector to hold itself accountable to prevent and address SEA (Cooney 2019; Aaronson 2018). From earlier cases of abuse by UN peacekeepers in West Africa in 2002 to more recent cases involving Oxfam in 2018, the extent of the problem appears to be not only widespread but also persistent/chronic (Powell 2018). This was reflected at the Global Safeguarding Summit 2018 by the former UK Government International Development Secretary, Penny Mordaunt:

> *"How have we failed, for so long, not to do what we know to be right.*
> *How have we failed to protect…How have we failed to hold to account.*
> *How have we failed to put people first…No environment is so chaotic or complex.*
> *No disaster or crisis so horrific…*
>
> *Now is the time for action. The aid sector needs to ensure it is meeting its duty of care to the world's most vulnerable people" (UK Department for International Development 2018).*

While the scandals illuminate persistent shortcomings of accountability across the sector, they not only demonstrate imbalance of power dynamics embedded within the structure of the aid sector but also illustrate the impact of a lack of formal regulations and ineffectiveness of reporting processes, or so-

called complaint mechanisms. There are two reasons for this. Firstly, the deeply rooted unequal power dynamics across multiple levels of the aid sector have created a permissive environment in which those in positions of power can take advantage of others (Barnett & Duvall 2005; Eyben 2008). The culture of inadequate downward accountability leaves power asymmetries unchallenged and unquestioned. Taking a stance using the lens of power, this thesis takes inspirations from power scholars such as Dahl (1957), Morris (2002), and Gaventa (2006) and attempts to situate accountability within broader debates on power dynamics using a 'powercube' analysis to unpack root causes of skewed accountability.

Secondly, downward accountability is not mandated by law or any formal regulations within the aid sector (Keohane 2002; Kilby 2006). Despite widespread recognition of the need to introduce regulations as a rational response aimed at correcting and sanctioning non-compliant behaviours (Ebrahim 2003; Burger 2012; Gugerty and Prakash 2010), the aid sector is only equipped with self-regulations and peer regulations as instruments to make NGOs accountable (Jordan & van Tujl 2007; Carolei 2023). As alluded to in the Global Safeguarding Review published in 2019, a lack of vigorous regulations is likely to have contributed to under-reporting and widespread of SEA (Safeguarding Resource and Support Hub 2019).

In understanding root causes for under-reporting and widespread of SEA, the thesis seeks to answer the following research question:

> To what extent have accountability mechanisms, specifically complaint mechanisms, helped affected populations to report experiences of sexual exploitation and abuse?

The two sub-questions arise which help to answer my research questions are as follows:

1) To what extent does the CHS, in providing as sector-wide standard in accountability, maximize the opportunities for NGOs to respond to complaints of SEA?
2) What role have complaint mechanisms played in enhancing downward accountability and tackling SEA?

These questions are informed by theories from wider literature focused on accountability, safeguarding and the aid sector. In addition, building on my direct experiences grounded in practice in the field and

technical engagement to mainstream the CHS, the thesis aims to drill down to develop a robust, evidence-based account of why existing safeguarding practices have failed and a theoretically- and empirically-informed model of what more effective approaches could look like.

To introduce my thesis, in this chapter I first offer overview of accountability logics and practices to situate my thesis in the wider field of literature. I explain my focus on the global accountability standard, which serves as the framework through which the effectiveness of complaint mechanisms is analysed. The context of refugee camps in Sudan is also outlined to illustrate the specific setting of my study.

Acknowledging that all types of vulnerable groups face SEA, including men, boys, individuals with disabilities, lesbian, gay, bisexual, transgender (LGBT), this thesis focuses specifically on women and girls. This focus is justified by recognizing that women and girls disproportionately experience SEA in humanitarian settings due to entrenched gender inequalities and power imbalances. Abundant literature consistently shows that women and girls are at higher risk of SEA, often facing unique forms of exploitation and challenges in reporting incidents. By concentrating on their experiences, this thesis aims to highlight the systemic issues and barriers they encounter, contributing to a deeper understanding of how gendered dynamics influence SEA within refugee communities.

Furthermore, while the thesis centres on women and girls, it does not overlook the vulnerabilities of other groups such as men, boys, and individuals with disabilities. Their experiences are also critically important and will be acknowledged and analysed within the broader framework of understanding and addressing SEA in humanitarian contexts. This approach ensures a comprehensive examination of the diverse challenges faced by different vulnerable populations, aiming to inform more inclusive and effective safeguarding practices. I then explain my methodology and summarise the academic and professional contributions of the thesis. Finally, I offer an outline of each chapter in my thesis.

1.2.2. Accountability logics and practice

Accountability is an important and critical issue for civil society organisations, particularly for international NGOs. It is a complex, multi-dimensional concept which is interpreted differently in

various contexts (Giddens 1979; Roberts 1991; Sinclair 1995; Everett and Friesen 2010). NGO accountability traditionally has been debated across a wide spectrum with principal-agent (PA) theory (Gibelman and Gelman 2001; Ebrahim 2003; Burger and Owens 2010) on one end and constructivist theory (Anheier and Hawkes 2008; Crack 2018; Kennedy 2019) on the other.

Rooted in a political economy approach and responding to the demands of increasingly competitive funding markets, PA theory is characterised by the focus on narrow, short-term compliance (Burger and Owens 2010; Burger 2012). It originates from New Public Management, a market-driven model that categorises NGOs as agents who perform public services on behalf of principals such as funders and governments. PA accountability-based approaches "advocate designing mechanisms to constrain agents (NGOs)' self-interested behaviour and achieve the goals of their principals (donors)" (Deloffre 2016: 725). Similarly, in a context whereby examples of operational and ethical misconduct[2] were identified following severe scandals[3] and scrutiny, PA theorists have continued to advocate for regulations to strengthen codes of conduct and correct non-compliant behaviours of NGOs (Slim 2002; Gugerty et.al. 2021).

The evolution of PA theory has given rise to various approaches, such as 'hierarchical accountability' (O'Dwyer and Unerman 2008), 'functional accountability' (Najam 1996), and 'resource dependency theory' (Perera, 1997); as well as 'upward accountability' (Edwards and Hulme 1996; Crack 2013). Amongst these approaches, accountability club theory places distinct emphasis on standards and enforcement to "establish the amount of 'beyond guideline' behaviours required by donors" (Gugerty and Prakash 2010: 18). Acknowledging that NGOs have incentives to develop mechanisms that provide a reputational signal to donors, it aims to "defend against criticism of poor accountability" (Crack 2018: 420). This thesis builds on these insights and seeks to investigate empirically whether and to what extent

[2] Misconducts such as such as inefficient use of funds, ineffective programs, inappropriate aid, and redundant provision of goods or services including ineffective approach to obtain feedback from the communities (effectiveness of complaint mechanism).

[3] Some high-profile scandals include the case following the 1994 genocide in Rwanda, the 2004 tsunami in Indonesia, and the 2010 earthquake in Haiti.

standards provided by a widely adopted certification scheme strengthens NGO accountability and minimize safeguarding failures.

Another side of the accountability logic spectrum leans towards a more constructivist approach, whereby accountability is viewed as a process of negotiation and deliberation between NGOs and multiple stakeholders with varied accountability demands (Anheier and Hawkes 2008; Van Puyvelde et al. 2012; Brown 2017; Crack 2018; Kennedy 2019). Unlike PA approach, constructivist scholars recognise the prominence of mutuality and offer space for different types of relationships to exist among NGOs and various stakeholders, whereby cooperation is emphasized over competition (Deloffre 2016; Kennedy 2018). In order to learn "socially constructed shared understanding on what is 'rightful conduct,' the importance of collaboration among stakeholders is given more significance than pressure towards upward accountability" (Crack 2018: 421).

As will be discussed more in depth in Chapter 2, while prior research viewed the PA and constructivist approaches as rival ways to tackle questions of NGO accountability, my research suggests that the most promising way forward is to draw on both accountability club theory which falls under PA approach and constructivist approaches. In other words, the thesis argues that the two approaches can be merged to strengthen accountability and minimize safeguarding risks. This is one of the first studies that build on these combined insights and add empirical evidence as to what works and what does not in tackling SEA, using a particular global accountability standard as a point of reference and analysis.

1.2.3. The Global Accountability Standard

Over the past three decades, the aid sector has established several global regulation initiatives (Crack 2018). These initiatives are designed to promote NGOs' accountability (Lloyd 2005) and enhance prevention of misconduct and abuse, including SEA. One of the most widely known initiatives is the Core Humanitarian Standard of Quality and Accountability (CHS). Established in 2014, the CHS is the result of a global consultation process, replacing three of the largest quality and accountability initiatives in humanitarian assistance – Sphere, Humanitarian Accountability Partnership (HAP), and Red Cross Code of Conduct (Joint Standards Initiative, no date).

CHS is the only global accountability standard in the aid sector that is equipped with two distinct mechanisms – a regulative mechanism called Humanitarian Quality Assurance Initiative (HQAI) and a collaborative body called CHS Alliance (CHSA). This thesis undertakes an exploration of the CHS utilizing the lenses of accountability club theory and constructivist theory, as depicted in Figure 1 below.

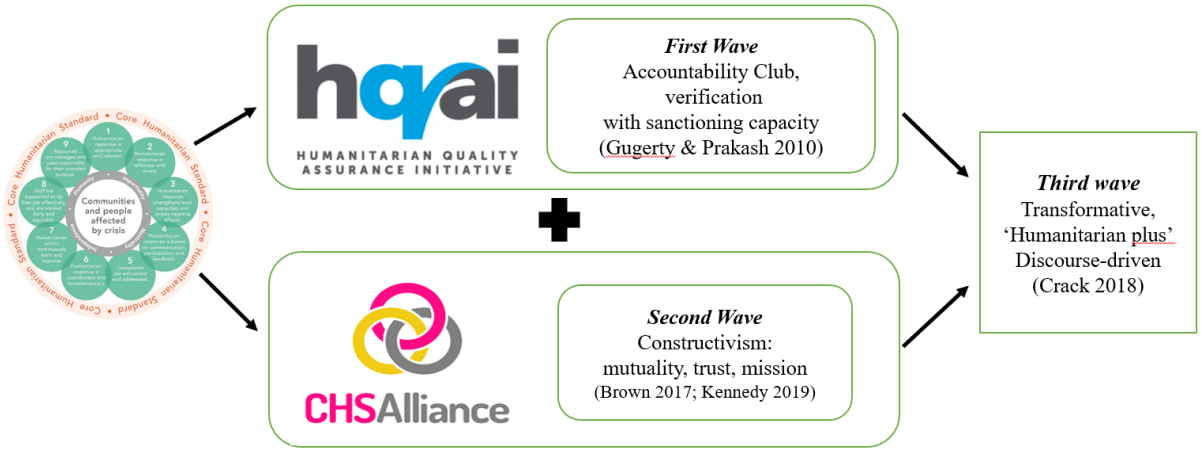


Figure 1. Accountability theoretical framework of the 'Humanitarian Plus' CHS

HQAI is an independent audit body that assesses NGOs' compliance against the CHS with strong verification mechanisms and sanctioning capacity (see Chapter 2 section 2.3). This approach reflects accountability club theory in that it imposes requirements beyond legal and donor guidelines using certification and sanctions. At the same time, CHSA facilitates sharing of best practices and promotes a culture of continuous improvement its members. The constructivist approach is demonstrated through the active role of sectoral learning and collaboration, "building a mutual understanding about their responsibilities in achieving joint goals (Berghmans et al. 2017: 1537). When the two approaches are merged in practice, the variety of accountability demands generates negotiation processes. For example, accountability between NGOs and donors is primarily based on a mechanism of *control* (PA approach), which aligns with the accountability logics of HQAI. On the other hand, accountability between NGOs and affected populations is based on democratic dialogues and *cooperation*, which aligns with the constructivist accountability logic of the CHS Alliance.

When accountability demands based on *control* and *cooperation* come together, they complement the effects from accountability club theory and constructivism theory. Firstly, they send signals to donors and governments from the mechanism of *control* that those NGOs that are compliant with CHS through HQAI annual audits are credible due to robust verification (Gugerty 2009). In a situation whereby breach of compliance against CHS is identified, HQAI – applying accountability club approach - utilises its authority to suspend the organisation's certification as a direct way of sanctions.

Simultaneously, CHS Alliance members can access and utilise sectoral good practices to enhance accountability to affected populations and safeguarding practices through participation in a collaborative Community of Practice, illustrating *corporation* logics signalling to peer agencies, donors, and internal staff. This logic in support of cooperation is reinforced by the drive towards upward accountability. In other words, because donors require standards like CHS that advocate for downward accountability, and because CHS compliance is explicitly incorporated within donors' reporting requirements, NGOs are required to shift the priority from upward accountability to donors towards accountability to affected populations. Through this process, the balance of NGOs competing logics is shifted towards downward accountability.

1.2.4. Downward accountability and complaint mechanisms

Despite longstanding rhetoric about the need for iNGOs to be more s accountable to affected populations (Wallace and Chapman 2003; Walsh 2014), delivering this in practice remains a challenge. As will be elaborated in Chapter 2 (See section 2.3), complaint mechanisms, a crucial component of downward accountability, serve as the initial step in empowering affected populations (Ebrahim 2003). These mechanisms are intended to offer a secure avenue for individuals to raise concerns based on a set of rules aligned with the values and commitments of NGOs. Their importance is reflected in the CHS which offers dedicated focus on complaint mechanisms throughout Commitment 5.

Despite the proliferation of guidelines on complaint mechanisms produced for and by practitioners (CHS Alliance 2018), Reddick (2010)'s global review on protection from SEA by United Nations and

NGOs finds[4] that the majority of SEA had gone undetected partly because no effective complaint mechanism was established through which those affected could safely report their concerns. Subsequent reviews also highlighted the continuing ineffectiveness of complaint mechanisms (Humanitarian Accountability Report 2018; Safeguarding Resource and Support Hub Global Evidence Review 2020; Office of Internal Oversight Services' Evaluation on PSEA by UN staff 2021). These reviews demonstrate that the proliferation of complaint mechanisms has not led to discernible change in SEA incidents and reporting (see Chapter 5). In order to understand why efforts to strengthen accountability using via complaint mechanisms have not resulted in increased reporting of SEA incidents, the thesis provides a specific case-study, presenting new empirical data to examine safeguarding failures and the effectiveness of complaint mechanisms in a specific context.

1.2.5. The refugee camp context

To enhance the focus on complaint mechanisms and safeguarding failures, I specifically chose to examine refugee camps over other humanitarian settings for several reasons. Refugee camps and displacement have long been a key focus of scholarly attention, with a notable prevalence of SEA reported in such settings compared to others, making them a critical context for my thesis (UNHCR; IASC AAP 2018). The particular vulnerabilities of refugees in these camps, marked by reduced access to basic needs, disrupted community structures, and limited social cohesion, creates an environment conducive to the flourishing of SEA (see Chapter 2 section 2.5). Notably, these vulnerabilities are highly gendered, with women and girls in particular facing the additional challenges of economic dependency, physical insecurity, and pervasive patriarchal norms (Mootz et.al. 2017). Because of this, while vulnerabilities of all types of populations including men and lesbian, gay, bisexual, transgender (LGBT) individuals who may face particular kinds of stigma and exclusion,

[4] Its methodology included self-assessments conducted by 14 UNs and NGOs guided by Reddick. The assessment consisted of reviews of policies and the extent of their directives and support to the field offices. This was followed by field research in two selected countries as well as desk research in five additional countries.

The unstable camp environment, coupled with the lack of enforcement of protective laws and policies, magnifies the risks of violence and protection concerns, especially for women who have already endured a traumatic journey to reach the camps (Murray 2000; detailed in Chapter 2 section 2.5). This thesis critically questions the effectiveness of complaint mechanisms within this challenging context, aiming to contribute to an under-researched area in the literature on accountability specific to displacement (Hilhurst et. al. 2021; Martin et.al. 2021).

1.2.6. Introducing Sudan

Being among the five countries with the highest populations of refugees and internally displaced people in the world, Sudan serves as an exemplary case (UNHCR Global Trends Report 2020). Its prolonged history of hosting refugees, owing to its strategic location as a source, transit, and destination state, especially for mixed movements across East Africa and the Middle East, adds complexity to the study (UNHCR & Refugee Consultation Forum 2022). Notably, before the 2023 civil war, Sudan is also recognized globally by the UN for its good practices, as evidenced by UNOCHA selecting it, along with Afghanistan, for effectively incorporating the Prevention of SEA in Humanitarian Response Plans. This recognition underscores Sudan's institutional coordination on PSEA, integrated with Accountability to Affected Populations, Protection, Child Protection, and Refugee Response Plan (UNOCHA 2020).

Um Rakuba Refugee Camp and Tunaydbah Settlement (formerly called Tunaydbah Refugee Camp) in East Sudan, serve as case study for understanding the complexity and challenges of accountability deficits and safeguarding failure in displacement context. Um Rakuba Camp and Tunaydbah Settlement are located in Gedaref State, sharing an international border with Ethiopia. Um Rakuba Refugee Camp, currently hosts 17,477 refugees, opened its door to Ethiopian refugees in December 2020 and quickly reached its full capacity. In January 2021, Tunaydbah Refugee Camp was established and now accommodates total of 23,094 refugees (UNHCR 2023a; 2023b). The overview maps of the camp and settlement can be found on the Appendix A.

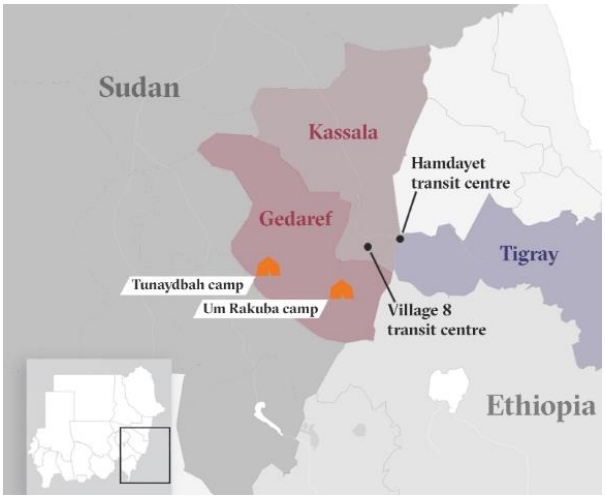


Figure 2. Map of Um Rakuba Camp and Tunaydbah Refugee Camp

During the course of this research, this region has experienced a significant influx of refugees, driven by the civil war in Ethiopia between the national government and the Tigray People's Liberation Front since November 2020, and the Sudanese civil war involving the Sudanese Armed Forces and Rapid Support Forces that began in April 2023. Um Rakuba Camp and Tunaydbah Refugee Camp have become shelters for refugees fleeing the Ethiopian civil war, particularly from the Tigray region, seeking safety and stability.

The selection of these camps for study is grounded on two pivotal reasons. Firstly, east Sudan reportedly has the highest SEA risks in the country due to ongoing internal tensions between the Sudanese government and the indigenous ethnic groups in the area (UNOCHA 2019). This was amplified by Ethiopian civil war that led to an influx of refugees from Tigray, Ethiopia to east Sudan. The ongoing Sudanese political turmoil has exacerbated the local situation, resulting in a significantly vulnerable and fragile context with high risks of SEA. Identifying a location with these characteristics was critical to examine safeguarding failures in a context whereby aid agencies intervene to recover livelihood of affected populations.

1.2.7. Power dynamics

In exploring shortcomings of downward accountability in safeguarding women in refugee camps in Sudan, it is imperative to examine the critical role of power dynamics in shaping accountability structures. Accountability cannot be adequately addressed without acknowledging and dissecting the power imbalances inherent in the relationship between those in positions of authority, namely aid workers, and the affected populations, namely refugees. This power asymmetry lays the foundation for safeguarding failures, notably evident in numerous scholarly works highlighting the misuse of power by aid workers, manifesting in exploitative actions such as the exchange of essential resources for sexual favours (Kovatch 2016; Lopez 2015; Shrestha 2011). The gendered nature of power relations further exacerbates power imbalances of men and women, perpetuating issues of SEA.

The implications of this power imbalance extend beyond a mere lack of accountability; they create an environment where affected populations feel disempowered and unable to articulate their concerns, particularly regarding sensitive issues such as SEA. The existing supply-demand dynamic not only perpetuates a culture of silence but also instils fear of retaliation and loss of vital aid. A gender-sensitive perspective highlights how these dynamics disproportionately affect women, who may face additional cultural and social barriers in reporting abuse.

To comprehensively understand the prevalence of SEA and safeguarding failures, it is essential to analyse the intricacies of power dynamics intertwined into accountability mechanisms more deeply at the theoretical as well as operational levels. Through the analysis of how CHS was developed and approaches to safeguarding in specific camp settings, this thesis thus endeavours to scrutinize both the discourse surrounding accountability standard of CHS and how their application affects reporting of SEA.

1.3. Methodology

In investigating the intention behind accountability standard and its application, I employ an interpretivist approach. As O'Reilly (2012) claims, "For interpretivists, it is essential to see humans as actors in the social world rather than as simply reacting as objects in the natural world…and human behaviour needs to be understood in the context of their particular society or culture" (O'Reilly 2012: 34). As I illustrate further in my literature review, accountability is 'chameleon-like' for its different meanings in different contexts, and this strengthens my belief that accountability is socially constructed and contextually shaped. An interpretivist approach creates free space in understanding of the meaning of accountability and its relationship to individuals and the professional, personal and wider contexts within which they are situated.

My use of an interpretivist framework, which highlights varying understandings of accountability and the importance of culture and context, naturally leads to qualitative research. de Gialdino (2009) suggests that "qualitative methods entail and manifest the assumptions of the interpretive approach, the grounds of which lie in the need to grasp the meaning of social action in the context of the lifeworld and from the actors' perspective" (27). This research is conducted to seek to understand social phenomena from a specific context and particular groups of aid workers and refugee populations

Given the sensitive nature of the topic, a qualitative approach was used to gather in-depth data from participants and this allowed me to develop necessary relations of trust with them (Oaskley 1981). Semi-structured interviews facilitate mutual knowledge which, in this research, was reinforced by my familiarity and experience in the field and the topic. Despite challenges that related to the Covid-19 pandemic, the barriers to accessing participants to conduct research on this sensitive topic, both for affected populations and NGO staff, was significantly mitigated through my professional networks. While acknowledging the benefits of in-person interviews, the Covid-19 pandemic made these impossible. Successful remote data collection heavily depended on my ability to connect with the participants over phone calls and where possible video calls. My approach to this was developed through my past experiences of working directly with refugees in the field and of conducting numerous

online interviews with affected populations for a consultancy assignment on safeguarding that I conducted immediately prior to my data collection phase.

The empirical data collection was broken down into two parts. First, I investigated CHS using Bacchi's 'What's the Problem Represented to be?' (WPR) approach, conducted 34 semi-structured interviews with stakeholders who took part in the CHS Consultation Process in 2014 and completing a review of 128 relevant documentations. I then undertook a case study of refugee camps in Sudan for the second stage and conducted semi-structured interviews with 31 aid workers in Sudan, 14 refugees based in the camps, and 12 safeguarding specialists who have experience working in the context of displacement and Africa. Across the thesis, triangulation of data has contributed to building a more robust and detailed overall understanding of the CHS in theory and in practice, as well as providing new data on the reality of SEA in my chosen camp settings. Due to the sensitive nature of the subject and the need for remote data collection, the use of various sources to establish patterns and trends was critical in strengthening and critically engaging with the claims made by interviewees. For instance, a substantial amount of effort and time was invested in understanding the context through reviewing media reports on the refugee crisis, as it was an ongoing humanitarian intervention that attracted high level of media attention during the course of my research. The findings are set out in Chapter and 4 and 5.

Chapter 4 examines the discourse on accountability standards, aiming to understand how accountability is represented as a problem within the CHS. Chapter 4 focuses on accountability standard discourses, seeking to understand the problem representation of SEA within CHS, for which complaint mechanisms are prescribed as a solution. The WPR approach offers a systematic way to study how a policy, in this case CHS, constructs problems. Guided by six questions, the approach provides tools to analyse the background to the Standard's creation and the consultation process leading up to its establishment in 2014. As part of WPR, I further undertook a systematic review of texts linked to CHS and its preceding standards to uncover changes in the way problems of accountability are represented and framed. This review reveals underlying assumptions about the lack of desirable conditions (i.e., a lack of effective complaint mechanisms). The findings were further explored through 34 semi-structured interviews with stakeholders who participated in the consultation process (see Chapter 3). Understanding how the

Standard came to shape accountability approaches, particularly the foregrounding of complaint mechanisms, helps answer the first sub-research question – to what extent does the CHS, providing as sector-wide standard in accountability, maximize the opportunities for NGOs to respond to complaints of SEA?

Following exploration of CHS using the WPR approach, a case study was employed to examine application of the CHS as the second stage of the research. Yin (2015) argues that "the distinctive need for case study research arises out of the desire to understand complex social contemporary phenomena…as it allows investigators to focus on a 'case' and retain a holistic and real-world perspective" (2015: 4). Complaint mechanisms are one of the key accountability mechanisms stressed within CHS to encourage more reporting of cases of sexual exploitation and abuse (SEA). I therefore chose to employ a case study method as it enabled me to gain better understanding of contextual factors that may affect behaviours of individuals who commit SEAs, as well to explore the responses of affected populations to such mechanisms. This is particularly important for my research as I endeavour to examine application of complaint mechanisms guided by CHS in one specific context in one country.

This second stage of the research seeks to answer the second sub-research question – what role have complaint mechanisms played in enhancing downward accountability and tackling SEA? This stage narrows the focus from CHS and complaint mechanisms in theory to its practical application. Based on a snapshot of the SEA situation in my selected refugee camps, the research identifies characteristics and patterns in SEA and highlights the specific vulnerabilities and risks facing women and girls, noting the key contributing factors which underpin widespread SEA within the camps (Chapter 5). Given that gender significantly influences unequal power dynamics across various levels and spaces, the powercube framework is used with a gender-sensitive perspective by examining how power and gender intersect across the powercube in addressing vulnerabilities and needs of women and girls. A gender sensitive approach to powercube analysis has been adopted by others seeking an in-depth understanding of specific power imbalance due to gender, for example in Buchy & Curtis (2005)'s study on donor strategy of Plan Guinea as well as Narayan-Parker's research on governance in rural India (2010). They

have both illuminated the interaction of gender and power relationships particularly with addition of household level of power.

The complaint mechanisms set up by individual aid agencies and collective approach are also examined to analyse accountability deficits that result from poor implementation of complaint mechanisms (Chapter 6). At the macro level, the second part of the research attempts to situate discussions on complaint mechanisms within the broader debates on downward accountability and power dynamics (Chapter 5) and explore how the accountability and safeguarding practices (See Chapter 6) are influenced by power imbalance where downward accountability to refugee populations is obstructed, creating more hurdles in encouraging reporting of SEA.

Due to the inability to travel as a result of the Covid-19 pandemic, I dedicated my efforts to nurturing trust with participants in order to obtain referral to other participants through snowballing approach, to access confidential documents and materials that are no longer in the public domain, and to gather insights into the sensitive situations and places where SEA occurs. In addition, secondary resources were widely consulted, including an emerging review from Safeguarding Resources and Support Hub on PSEA (2021) and Amnesty International reports on refugee populations from Tigray, Ethiopia who are the core group of my research participants (2021). Chapter 3 further illustrates how these methods interacted and built upon one another to strengthen data, taking considerations of research ethics and my positionality.

Finally, taking a continuously reflexive research approach, keeping journals and noting my reflections have helped me to constantly acknowledge and question my own biases and prior knowledge. This approach is reflected in my choice of qualitative, discourse analysis approach, which is detailed in Chapter 3 section 3.4. Names of aid providers and interviewees are kept strictly confidential to maintain anonymity of participants. Finally, it is important to note that this research is not written as a criticism of any specific interventions or organisation but is instead a discussion of humanitarian accountability and safeguarding within the aid sector more widely.

1.4. Key findings

Returning to my research questions, the thesis discovered that CHS has not fully harnessed the potential of complaint mechanisms to encourage affected populations to report SEAs. While complaint mechanisms have raised awareness of NGOs' intentions to engage proactively with affected populations and receive complaints, they do not fully address power imbalance and thus do not sufficiently enhance downward accountability to the refugee communities in preventing and tackling SEA within the context of refugee camps.

The first stage of the research reveals that CHS, which is currently widely used across the sector, can maximize the opportunities to respond to complaints of SEA if power imbalance is more explicitly addressed, with increased coverage of PSEA within the CHS. The second stage of the research unpacks the reality of SEA within the refugee camps, revealing widespread SEA by different groups of perpetrators exercising power over refugee communities. It identifies five types of complaint mechanisms commonly used across the camps, noting their varying levels of effectiveness to shift power.

Key findings indicate that a lack of explicit approach within the standard itself to address power dynamics of various forms, spaces and levels limits the extent to which CHS generates genuine opportunities for refugees to utilise complaint mechanisms. Power dynamics between aid providers, rights-holders, and other stakeholders need to be centred in accountability debates. In order to coherently tackle SEAs committed by stakeholders occupying all forms of power, prevention of SEA must be inclusive of all the stakeholders, as opposed to sole engagement between the two parties of NGOs and affected populations.

The thesis further utilises a 'Swiss Cheese' illustration to visualise the relationship between different complaint mechanisms in the refugee camps. I argue that while recognising that individual complaint mechanisms come with specific strengths and gaps, we must harness the complementary nature of diverse mechanisms to compensate for individual limitations but must also endeavour to transform the gaps into collective strengths, creating a mosaic of opportunities and platforms for reporting SEA

concerns. Exploring the intricacies of the 'Swiss Cheese' analogy as applied to the context of refugee camps in Sudan reveals a critical lens through which the gaps in the current complaint mechanisms are illuminated. It is imperative to recognize that not every individual mechanism is expected to surmount every challenge; rather, the collective array of mechanisms collaboratively offer a comprehensive spectrum of opportunities for reporting and compensate for each other's shortcomings.

1.5. Summary of contribution of the thesis

1.5.1. Academic contributions

The thesis makes unique contributions on both academic and practical grounds. From the academic perspective, the thesis contributes in two ways. Firstly, the thesis is one of the first studies to utilise the two contrasting approaches of principle-agent /accountability club theory and constructivist approach to comprehend the concept of downward accountability. While most prior research claims preference for one another, my thesis seeks to combine the strengths of the conflicting approaches. Due to the distinctive model in which CHS functions with regulative and collaborative bodies, this particular accountability initiative offers strengths of accountability club theory - with the use of enforcement and sanctions - as well as strengths of constructivist approach with emphasis on collaboration.

Secondly, many scholars have indicated a lack of empirical studies on downward accountability in safeguarding, particularly on the effectiveness of complaint mechanisms to report SEA cases. While a limited number of scholars (Kovach 2006; Brown 2008; Agyemang et al. 2009; Sinead 2014; Noor 2016; Berghmans et.al. 2017) have explored complaint mechanisms as one of a range of accountability instruments, no scholarship has primarily focused on complaint mechanisms. This indicates a remarkable disjuncture between the high levels of interest in complaint mechanisms amongst practitioners and inadequate attention afforded to the subject by researchers. It also alludes to faith that practitioners are placing on complaint mechanisms as a way to tackle SEA, despite the fact that the evidence as to whether and how they might do this is limited. Furthermore, it also suggests challenges

of accessibility for academic researchers as a reason for limited literature on complaint mechanisms. This is where I am uniquely well positioned to conduct research of this nature as a longstanding practitioner with wide professional networks to reach NGOs and affected populations.

1.5.2. Professional contributions

From the perspective of practitioners, the thesis provides significant contributions through new empirical evidence on accountability failures. It also offers in-depth analysis of the accountability standard and its influence on its application in relations to safeguarding. Building on my direct experiences grounded in practice in the field and my role in technical engagement to mainstream the CHS, the thesis has contributed to developing a robust, evidence-based account of why existing safeguarding practices have failed and a theoretically- and empirically-informed model of what more effective approaches could look like.

The research findings have played a role in shaping the CHS Revision Process that commenced in May 2022 and finished in late 2023, with the revised CHS launched in March 2024. The revised consultation process has incorporated gaps from the initial consultation process in 2014, which were identified in my research, particularly around realignment of the governance structure and consultation methodology highlighting power imbalance of various stakeholders involved in the process. Similarly, the findings on complaint mechanisms and CHS have influenced strategic discussions on the global safeguarding framework recently developed by FCDO and project methodology for the Closing the Accountability Gap in PSEAH in the Aid Sector Project managed by CHS Alliance.

Finally, a key contribution of my thesis lies in bringing together the two pools of research from scholars and practitioners, addressing the major gap in the literature on empirical evidence of enabling factors and barriers to downward accountability. Due to its attention to the global standard as well as local contexts of refugee camps, the research endeavours to enrich scholarly understanding of the interaction between policy levels and research communities, to generate practical insights that can apply to other humanitarian settings worldwide, specifically displacement settings.

1.6. Outline of the Thesis

Following this introduction, **Chapter 2. Framing accountability, safeguarding, and power dynamics**, provides a literature review of a diverse range of critical humanitarian and development studies scholarship on accountability, safeguarding, refugees/forced migration, and power. Thinking through questions such as - what is accountability? To whom are aid workers accountable to? For what? And how? the implications of these questions overlap one another due to intersections on accountability relationships and logics towards various stakeholders. While traditional approaches consistently view accountability from a principal-agent theory perspective, grounded in contractual relationships between principals and aid providers (Edwards and Hulme 1995; Ebrahim 2003; Gugerty and Prakash 2010), other scholars inspired by constructivist theory (Berghmans et al. 2017; Kennedy 2019) emphasise a broader range of accountability logics. As will be shown in the Chapter 2, this thesis seeks to set out a 'middle way', drawing on both principal-agent and constructivist approaches as its point of reference.

The multi-layered accountability mechanisms are unpacked in the context of refugee camps. This is done in consideration of how power relations between stakeholders are reflected in accountability mechanisms. Drawing on the work of John Gaventa, the 'powercube' is used to analyse the complexity of accountability and power in the context of displacement. The chapter thereby situates my research both within scholarly fields of accountability and safeguarding and within the context of the refugee camps.

Chapter 3. Methodology: Researching SEA without doing harm presents the approach used in this research. It begins by framing the research in the context of Covid-19 pandemic, illustrating the significant challenges that required constant flexible mindset and redesign of approaches throughout the course of research from 2019-2023. I set out the necessity to pivot the focus of my research from action-oriented to a more constructivist approach due to having no physical access to the field. Given my positionality and experience, taking a reflexibility approach remained a key consideration throughout my research and I discuss the implications of this in detail in the chapter.

As discussed earlier, due to the subjective nature of the concept of accountability, which is associated with different meanings in different contexts, the thesis adopts an interpretivist approach to embrace the socially constructed and contextually shaped culture. The chapter also sets out in detail how data was collected, analysed and triangulated, explaining and justifying the decisions taken during this research on a sensitive topic and involving groups who may be considered vulnerable in a number of different ways, both professionally and personally.

Having reviewed relevant literature and explained my research methodology, **Chapter 4. Problem representation of accountability within the CHS** presents data on the intention of the CHS. Through interviews, original analysis of documents and exploration of the process which led to the creation of CHS, including using documents previously not available to researchers, a set of themes, hidden assumptions and silences are identified to frame accountability to affected populations (AAP). The chapter examines where the PSEA debates sat within the wider humanitarian landscape at the time of consultation, leading through and up to the launch of the CHS in December 2014. The chapter concludes with my key claim that the CHS itself could maximize the opportunities to respond to complaints of SEA if it contained more explicit recognition of power imbalance and specific strategies to address this.

Chapter 5. Sexual exploitation and abuse in the Sudanese refugee camps then provides a snapshot of sexual exploitation and abuse in two refugee camps in East Sudan. Taking stock of accountability failures, based in interviews and document analysis, the chapter reveals drivers and types of SEA prevalent in the camps. It also identifies the various forms of power which different stakeholders committing SEA have and the spaces in which they operate. This chapter argues based on the original data that no aid providers currently take full duty-bearing responsibilities to protect and ensure the rights of refugee communities.

In the following **Chapter 6. Complaint mechanisms and power dynamics in refugee camps,** the focus turns to the identification and application of accountability mechanisms. It examines how the intention of CHS, outlined in Chapter 5, is applied in practice in the camp setting. This chapter presents the data on CHS and accountability mechanisms in practice, considering which

accountability/complaint mechanisms have worked and ones have not, and to what extent. Safeguarding failures identified in Chapter 5 are reflected on this chapter, and it argues that individual complaint mechanisms have created only limited opportunities for refugees to report SEA cases. However, it does also acknowledge that when collectively taken together with the wider protection interventions, complaint mechanisms have positively influenced the ways in which refugees share their concerns. The chapter therefore situates discussions on complaint mechanisms within the broader debates on downward accountability and power dynamics outlined in Chapter 5 and recognises their position within a wider spectrum of accountability mechanisms.

Finally, **Chapter 7. Conclusion: Lessons learnt to prevent past mistakes** reviews the main arguments and material presented in this thesis, followed by discussion on the theoretical and methodological limitation of my research. I then move on to policy implications and recommendations for aid providers. I conclude by sharing my main contribution to knowledge and opportunities for future research.

Chapter 2. Framing accountability, safeguarding, and power dynamics

2.1. Introduction

This chapter reviews the literature on accountability and safeguarding that are used to answer my research question on the extent to which complaint mechanisms have helped affected populations to report complaints on sexual exploitation and abuse. Firstly, accountability is examined from the broad perspective - what is accountability? To whom are aid workers accountable? For what, and how? The chapter then explores literature on downward accountability in general before narrowing to safeguarding and discussing SEA as the most malicious breach of accountability.

The chapter further sets out why refugee camps are hotspots for SEA, exploring specific characteristics that contribute to flourishing of SEA. Multiple accountability mechanisms that are present within this context are also examined along with the identification of a range of key stakeholders involved in safeguarding, including UNHCR, host state, NGOs, and the UN-led Inter-Agency Standing Committee on PSEA. Finally, the chapter sets out Gaventa's powercube to analyse the dynamics of power across spaces, levels and forms in the context of the refugee camps. The chapter thereby situates my research both within scholarly fields of accountability and safeguarding and within the context of the refugee camps, as well as setting out the analytical framework used in the thesis.

2.2. The role of non-governmental organisations (NGOs)

Non-governmental organisations (NGOs) have emerged as significant actors in international development and global politics. They operate in a wide array of fields including education, human rights, poverty alleviation, disaster relief and healthcare and play a crucial role in filling gaps in government services and protection (Hilhorst 2003). Acting as advocates for marginalised communities across the globe, NGOs strive to bring about positive change in the pursuit of a more equitable and sustainable world. While the term NGO compasses a wide range of organisations with different structures and sizes, they all share common characteristics. Firstly, they are mission-driven. Based on

shared values and interests for public benefit purposes, they engage with a wide range of stakeholders (Fisher 1997; Salamon & Anheier 1999; Kilby 2006). Secondly, they are established as a separate legal entity under the laws of the countries they operate in and thus are independent of government control and maintain their autonomy as self-governing independent bodies (Fowler 1996; Lloyd & Cases 2006). This registration provides them with certain rights and responsibilities, including the ability to manage their affairs independently under national law and regulatory bodies in a jurisdiction with their own governing structures.

As the aid sector continues to expand, there have been increasing criticisms about their work, and the call for greater NGO accountability has mushroomed for several reasons. First, as NGOs have become major players, the aid sector has continued to experience exponential growth since the mid-1970s (Zyl and Claeye 2018; Ghani 2020). Second, due to their significant dependence on resources in a competitive marketplace, NGOs must strive to convey a credible signal of the quality and effectiveness of their operations. This effort is essential to differentiate themselves from other peer agencies and secure funding from donors. The increasing global proliferation of NGOs also poses a challenge for donor governments, making it difficult to discern credible organizations. In response to this challenge, self-regulatory initiatives and accreditation within the NGO sector provide valuable tools. These mechanisms not only enable NGOs to enhance the quality of their interventions but also serve as signals to donors, indicating which NGOs adhere to the endorsed standards (Schmitz et al. 2012).

Furthermore, a series of high-profile sex scandals spanning from 2002 to more recent incidents in 2018, which shed light on alleged wrongdoing by NGOs, significantly impacted the public perception of and support for these organizations (Fremont-Smith and Kosaras 2003; Gibelman and Gelman 2004). Beginning with a report in 2002 from UNHCR and Save the Children, allegations of sexual exploitation and abuse (SEA) have prompted intense scrutiny of the aid sector (as will be discussed further in section 2.4). While these scandals bring attention to specific NGOs, they have also cast a shadow on the overall reputation of NGOs across the sector. Consequently, there is a growing demand from the public and policymakers for increased accountability (Gibelman and Gelman 2001; Ebrahim 2003). As observed by Knox and Mitchell (2011), there has subsequently been an accountability reform in humanitarianism,

with the sector embracing self-regulatory initiatives to showcase performance and transparency (2011: 3).

2.3. NGO accountability

2.3.1. Definitions of accountability

Accountability is a complex, multi-dimensional concept and broadly concerns processes of holding actors responsible for their actions. Its definition varies significantly depending on social, political, economic, cultural, and religious norms among others (Giddens 1979; Sirajuddin and Aslam 1995; Coker 2012). Historically, accountability has been considered the bedrock of social policy, representing the fundamental element in the implementation of service provisions (Brett 1933; Walsh 2014). Initially tied closely to financial accounts, reporting, and governance within the public sector for monitoring service provider performance (Munro and Hatherly 1993; Cochrane 1993), its scope expanded with the New Public Management in the 1980s. This management approach, emphasizing monitoring through performance indicators, facilitated the extension of accountability concepts and models from the public sector to the non-profit sectors (Goetz & Jenkins 2002).

In the context of the aid sector, NGO accountability has become more prominent over time (Edwards and Hulme 1994; Cornwall et.al. 2000). In his study of over 600 NGOs across the globe, Scholte (2003) demonstrated that accountability in the early 2000s was given little attention by NGOs and was seen as an ‘emergent language’. Intense public scrutiny of emergency responses, exemplified by the Southeast Asia Earthquake and Tsunami Response in 2004, has brought to light deficiencies in the accountability of NGOs to the populations they serve (Tong 2004; Crack 2014). This scrutiny prompted a notable shift in the 2000s, marked by the emergence of standards and accountability initiatives initiated by NGOs within the aid sector. Consequently, accountability has evolved into a more embedded practice, gaining prominence as a priority topic during the World Humanitarian Summit in 2016 and subsequent global summits led by the United Nations (Deloffre 2016; Carolei 2023).

The definition of accountability has however varied among scholars and practitioners. Two of the leading accountability scholars, Edwards and Hulme (1996) define it as "the means by which individuals and organisations report to a recognised authority and are held responsible for their actions" (967). Fox and Brown (1998) propose a similar definition: "the process of holding actors responsible for actions" (12). These definitions, however, narrowly focus on financial accounts and the need to demonstrate that resources have been used appropriately and transparently. Cornwall, Lucas, and Pasteur (2000) widen the perspective and highlight "the dual dimensions of being held responsible by others and taking responsibility for oneself" (3).

NGO practitioners also approach the concept of accountability using a similar lens with the expanded perspective by Cornwall et al (2000). Shah and Shah (1996), who conducted research on participatory methodologies to enhance accountability using a case study of Aga Khan in India, contend that practitioners view it as a concept that relates to the wider process of consultation, engagement, information exchange, and decision-making from the perspective of the communities. They argue that it places less emphasis on being held responsible by others through reporting. The focus on affected populations is also visible in the definitions by NGOs and practitioners. For instance, the Accountable Now (formerly known as the INGO Accountability Charter) defines accountability as "engaging key stakeholders in meaningful dialogue to enable continuous improvement for those we serve and using power responsibly and enabling stakeholders to hold us to account effectively" (Crack 2018: 420). Similarly, the United Nations collectively define accountability as "the obligation to demonstrate that work has been conducted in accordance with agreed rules and standards, and that performance results have been reported fairly and accurately" (UNDP Accountability Framework 2008). This range of definitions by scholars, practitioners and international organisations demonstrate that despite common features there are varying interpretations and different emphases. Thus, as Everett and Friesen put it: "accountability is 'chameleon-like' for its different meanings in different contexts" (2010: 469).

Spanning all definitions of accountability and informed by my own experience as a practitioner, I find the emphasis on 1) participatory processes, 2) responsible use of power, and 3) application across diverse levels to be pivotal aspects of accountability. Guided by these principles, the thesis adopts a

middle ground that bridges the perspectives of scholars and practitioners. Based on this, the thesis defines accountability as a participatory process that holds actors accountable to stakeholders at multiple levels while responsibly wielding power. This aims to enhance accountability specifically to affected populations.

2.3.2. Theoretical understandings: Waves of accountability

NGO accountability can be approached from multiple theoretical approaches. Traditionally, scholarship on NGO accountability has been predominated by principal-agent (PA) theory and constructivism theory (Gibelman and Gelman 2001; Ospina et al. 2002; Burger and Owens 2010). Drawn by Crack (2013), I view the two dominant accountability approaches as the first and second waves of accountability reforms. While the two approaches sit at different ends of spectrum of accountability approaches, my thesis draws upon Crack's insights to adopt 'third wave' approach. This approach takes a holistic perspective that harnesses advantages of the two approaches to foster a more refined and intricate approach to accountability practices.

First wave: Principle-agent theory

Driven by political economy approach highlighting legal and fiscal compliance, PA theorists emphasize financial relationships between principals (donors) and agents (NGOs), characterised by control and compliance to monitor performance (Alchian and Demsetz 1972; Edwards and Hulme 1995; Ebrahim 2003). Described by Crack (2013) as the first wave of accountability reforms, this approach views accountability as an externally motivated construct (Dhanani and Connolly 2015). Its underlying rationale is influenced by the power of donors in overseeing and directing agents - NGOs (Pallas and Guidero 2016). Actors adopting this approach focus on designing mechanisms to constrain NGOs' self-interested behaviours, with power to sanction a misbehaving or under-performing agent (Prakash and Gugerty 2010). For this reason, this framework is referred as 'system-control' and a compliance-based approach driven by the donors' desire to control how funds are to be spent and monitored (Coule 2015; Schmitz et al. 2012). Its implications are evident in the form of donors' statutory reporting requirements and NGO annual reports.

The discourse on accountability has been largely shaped by PA theory, attracting considerable attention from a diverse group of scholars. A well-established group of theorists have extended PA principles to 'hierarchical accountability' (O'Dwyer and Unerman 2008), 'functional accountability' (Najam 1996), 'resource dependency theory' (Perera 1997); and the more well-known 'upward accountability' (Edwards and Hulme 1996; Crack 2013). The common theme here is that all focus on narrow, short-term compliance-based approaches aimed at meeting the requirements of donors in order to ensure the survival of NGOs (Ebrahim 2003). Its intended outcome is rule conformity with *target-driven* approach (Crack 2013).

Voluntary accountability club theory under PA approach

Under this overarching PA perspective lies 'voluntary accountability club theory', which highlights the use of both standards and enforcement. While the club theory predominantly focuses on the private sector (Sandler and Tshirhart 1997; Cornes and Sandler 1996), the perspective has also been used by nonprofit and accountability scholars. Gugerty & Prakash (2010), the two prominent accountability scholars who explored the emergence of this club theory and its effectiveness, explain that accountability clubs are structured as rule-based institutions designed to generate collective advantages that are accessible only to their members, while non-members are excluded from these benefits. These clubs set standards that surpass legal obligations, providing reputational benefits to members who adhere to the specified policies of the club (Schmitz et al 2012).

This approach initially emerged in response to the challenge of information gaps between buyers (donors) and sellers (NGOs), arising from donors' inability to fully assess the quality of NGOs. The information deficit led to the development of a market for regulations and certifications, where buyers (NGOs) willing to pay an intermediary to signal the quality of their services to donors (Potoski and Prakash 2009). Similar to signalling theory (Traxler et al. 2018), the club framework emphasizes establishing high standards and fees to signal credibility to donors, with subsequent verification of compliance (Gugerty 2009).

The level of standard and the degree of monitoring and sanction vary among the clubs. Drawing insights from Deloffre (2010) and Anderson (1996; 2023), the standards are classified into two categories: the 'good enough' standard and 'humanitarian plus' standard. 'Good enough' standard centres around charitable efforts with emphasis on provision of basic necessities and services to reduce acute suffering of affected populations. Over time, the sector recognises the focus on output (number of shelters and water distributed etc) is insufficient to ensure accountability to affected populations as "many agencies learned that good intentions were no guarantee of quality" (HAP 2006: 8). Anderson (1996; 2023), an initiator of the Do No Harm Project in 1993, asserted the necessity that the aid given should not, itself, make things worse and should instead improve the connecting fabric of society. The concept of a 'humanitarian plus' standard was born out of this conviction. Unlike the 'good enough' standard, 'humanitarian plus' extends beyond short-term assistance and "requires NGOs to provide aid that is not only adequate and appropriate but also addresses the root-causes of humanitarian crises and does no harm" (Delofree 2010: 181).

The varying standards within voluntary accountability clubs stem from the 'good enough' and the 'humanitarian plus' approaches. These standards all serve as mechanisms by which NGOs signal their commitment and the quality of their interventions to their principles – donors. Delofree (2010), who explored the design of two voluntary accountability clubs – Sphere and COMPAS Qualite, asserts that a strong signal is likely to be sent to donors when accountability club standards align with the 'humanitarian plus' level. Such stringent requirements, exceeding donor guidelines, coupled with robust verification mechanisms and sanctioning capacities, contribute to a more effective and credible accountability framework. Critics however noted that this approach and the overarching PA theory primarily focus on accountability towards donors, neglecting accountability to affected populations.

Second wave: Constructivism framework

In contrast to PA theory and accountability club, constructivism theorists emphasize the pivotal role of social factors such as mutuality and trust in shaping accountability practices. This perspective aligns with the critiques of PA theory articulated by various scholars (Anheier and Hawkes 2008; Van Puyvelde et al. 2012; Brown 2017; Kennedy 2019). The pioneering contributions of Edwards and

Hulme (1996) initiated a trend of critique and caution against the adverse impacts arising from the prevalent emphasis on upward accountability to donors.

Unlike PA theory that has highlighted the 'economic' perspective of accountability, the constructivist approach is increasingly recognized as an alternative that values the significance of mutuality and the establishment of a shared understanding of responsibilities and missions in achieving common goals (Berghmans et al. 2017: 1537; Crack 2018). This approach acknowledges the complexity of relationships among NGOs and stakeholders, emphasizing cooperation over competition (Deloffre 2016; Kennedy 2018) as well as diversity of stakeholders such as peer agencies. Framed under the second wave of accountability reforms, as described by Crack (2013), it centres on placing affected populations at the core, providing a framework that facilitates the exploration and cultivation of various types of relationships within the accountability realm, promoting collaboration and shared objectives. Its intended outcome is to achieve missions informed by dialogue and cooperation, or "*discourse-informed*" as described by Crack (2018).

Recognising the complexity of accountability relationships, a mounting number of scholars has further proceeded the debate through the focus of 'stakeholders' (Clarkson 1995; Hyndman and McDonnel 2009), 'functional' (Najam 1996), 'mutual' (Litovsky and Mac Gillivray 2007; Brown 2008), and 'holistic' accountability (Williams and Taylor 2013). These approaches broaden the focus beyond control and compliance to the donors but instead encompass a wider range of accountability obligations that NGOs manage, extending to governments, staff, members, supporters, and peer agencies. These nuanced discussions reflect the evolving understanding of accountability, recognizing the diverse relationships and obligations that NGOs navigate in their interactions with various stakeholders.

Third wave: the potential for compatibility and complementarity between the first and second waves

Building on Crack's proposal (2013), the evolution into the 'third wave' of accountability in the aid sector represents a step forward in synthesising insights from both the principal-agent theory and constructivist approaches, aiming to address the complexities of accountability across diverse stakeholder. Crack (2013) finely posits that this wave does not merely combine the foundational

principles of the first two waves but rather leverages their respective strengths to cultivate a more sophisticated, nuanced understanding and application of accountability practices.

Empirical evidence, such as Johnson's (2001) study in southern Thailand and Walsh's (2014) investigation into downward accountability in Uganda, emphasises a shift towards prioritizing NGOs' commitment to downward accountability—a shift increasingly recognized by institutional donors like the Danish International Development Agency, Foreign Commonwealth and Development Office, and Disaster Emergency Committee as essential for funding (Humanitarian Quality Assurance Initiatives 2021). This evolving donor perspective signifies a departure from rigid interpretations of accountability, advocating for a holistic approach that values both principal-agent and constructivist theories.

Further exploration by Zibin et al. (2023) into the tensions between donor and beneficiary accountability through Crack's concepts of three waves, illustrates how disparities in power, legitimacy, and agendas exacerbate challenges in balancing upward and downward accountability. This is complemented by Hielscher et al. (2018) and Chu & Luke (2022), who collectively highlight a sector-wide trend towards prioritizing needs of affected populations and long-term objectives over strict donor compliance, signalling a broader acknowledgment of the necessity for a more inclusive and effective approach to accountability.

The third wave, therefore, is "reflective practice using discourse-driven approach to achieve missions" (Crack 2013: 304), stressing the focus on empowered affected populations. By advocating for this integration, this thesis contributes to a broader understanding of accountability that is adaptable and context-sensitive in its application. The novelty of this research lies in the practical application of the third wave of accountability reform, showcasing how synthesizing accountability club theory and constructivist approaches can result in a more holistic, inclusive, and effective accountability framework for NGOs.

2.3.3. Accountability to whom – for who and what?

Debates continue to evolve around to whom NGOs should be held accountable (Ebrahim 2003; Schmitz 2012; Crack 2014; Aijazi 2021; Wang 2021; Chu & Lukes 2023; Voorst et.al. 2023). With a wide range of stakeholders, NGOs manage various accountability logics and conflicting demands in four directions – upward, downward, horizontal, and internal (Edwards and Hulme 1996; Prakash and Gugerty 2010). NGOs are upwardly accountable to donors and governments who impose legal requirements with terms and conditions (Najam 1996; Fowler 1996). They are downwardly accountable to affected populations on moral basis (Tong 2004; Prakash and Gugerty 2010). Accountability also extends horizontally to peer NGOs as well as internally to NGO staff (Dwyer and Unerman 2008; Murnaza 2012).

The practical manifestation of various accountability demands raises questions about whether these dimensions operate in competition or synergy. Diverse theoretical perspectives and empirical studies consistently stress a significant disparity in the allocation of resources, with NGOs overwhelmingly prioritizing upward accountability over its downward counterpart and peer agencies (Dhanani and Connolly 2012; Najam, 1996; Ebrahim 2003a; Schmitz et al. 2012; Andrews 2014). Notably, Ebrahim's (2003) exploration of various accountability mechanisms in practice identified a predominant focus on upward accountability to donors. Similarly, Farmer (2006) and Bond et.al. (2002) found in their research that NGOs explicitly prioritize upward accountability to donors due to their reliance on funding for day-to-day operations.

This skewed accountability approach has impacted NGOs' capacity, abilities and incentives to improve downward accountability. Edwards and Hulme (1996), Shah and Shah (2003), and Kilby (2006) have all claimed that the time and resources spent by NGOs on enhancing upward accountability has reduced their capacity to invest in downward accountability to affected populations. As a consequence, this imbalance has given rise to what is referred to as an 'accountability gap' (Salamonet al. 2000: 9). Despite its theoretical priority, downward accountability remains the least developed in practice, creating a notable disparity (Crack 2013; Hilhurst et.al. 2021).

This context of a noticeable accountability gap highlights the critical need to scrutinize downward accountability, especially in the realm of safeguarding against sexual exploitation and abuse (SEA). Examining SEA instances where aid workers caused harm and failed in being accountable to affected populations becomes imperative. Acknowledging the scarcity of empirical evidence in this area, academic scholars consistently highlight downward accountability as one of the least developed research domains (Walsh 2014; Hilhurst et al 2022; Anderson 2023). This gap aligns with the persistent call to prioritize downward accountability, with scholars suggesting that paramount importance should be given to the accountability demands and needs of affected populations (Williams and Taylor 2013; Crack 2013). This nuanced examination of downward accountability is not only critical for understanding potential NGO shortcomings but also pivotal for developing effective safeguarding mechanisms that prioritize the well-being and rights of affected populations.

Insufficient accountability to affected populations presents a significant challenge, with some scholarly literature identifying one particularly critical impediment to enhancing downward accountability. These scholars argue that the primary obstacle lies in the absence of legal mandates or formal regulations governing downward accountability (Keohane 2002; Kilby 2006; Carolei 2023). It is an undefined empowerment process with no mechanisms outlined to demonstrate downward accountability (Ebrahim 2003; Schmitz et al. 2012; Kennedy 2019). This vagueness makes implementation and enforcement difficult. In contrast, authorities and powerful stakeholders, such as donors and governments, demand NGO accountability in the form of annual reports and financial documents with clear outlined formats, resulting in much stronger pressure for upward reporting to ensure their survival (Gent et.al 2015).

2.3.4. Accountability through NGO watchdog and regulations

Against the backdrop of safeguarding scandals, NGOs have come under intensified scrutiny from donors, governments, and the public, a scrutiny often amplified by media coverage (Clark 2019; Afrooz 2020; Daoust & Dyvik 2021). This heightened focus on severe downward accountability violations has prompted discussions about the entities to which NGOs should be accountable (discussed further below in section 2.4). Unsurprisingly, these conversations have gravitated towards creation of an oversight

body for charitable activities, commonly referred to as upward accountability. The following section examines the roles of an NGO regulatory body and narrows its focus down to discuss the Core Humanitarian Standard of Quality and Accountability.

NGO regulatory bodies

Regulatory bodies worldwide play a pivotal role in overseeing NGOs, ensuring their accountability, transparency, and adherence to legal standards. Despite a lack of legal authority under international law (International Law Commission 2001; McArdle & Shucksmith-Wesley 2021), regulatory bodies possess power to grant and revoke the charity status in case of misconduct and mismanagement of aid organisations. For the United Kingdom where the Haiti Oxfam sex scandal became the epicentre of the NGO safeguarding crisis in 2018, the Charity Commission (CC) acts as an institutional watchdog for UK-based NGOs, enforcing legal duties and safeguarding measures for trustees, staff, and stakeholders engaged with charities. Some possible actions include imposing penalties in response to safeguarding breaches, ranging from fines to the suspension or revocation of an NGO's registration. Notably, the Haiti Oxfam scandal triggered comprehensive inquiries by the CC, amplified by the UK Parliament International Development Committee's investigation into SEA within the aid sector (Daoust & Dyvik 2021; Carolei 2022). These investigations serve as tangible examples of regulatory bodies actively responding to misconduct, underlining the crucial watchdog role they play in upholding accountability and integrity within the aid sector.

Proliferation of NGO self-regulations

This backdrop of active regulatory oversight sets the stage for the growing trend towards self-regulation among NGOs. In recent years, there has been a proliferation of voluntary peer regulations as a means for NGOs to showcase their commitment to accountability (Omelicheva 2004; Jordan 2005; Lloyd et al. 2007; Walker-Simpson 2021; Carolei 2022). Table 1, below outlines emergence of global accountability and safeguarding standards, often triggered in response to high profile scandals.

Table 1 Timeline of emergence of global accountability and safeguarding standards

Year	Global accountability & safeguarding standards	Description
1994	Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Response developed	Voluntary with no monitoring requirements. Good enough standard.
1997	NGO Charter created by One World Trust	Voluntary code of conduct consisting of commitment to accountability and transparency. Annual reporting Good enough standard.
1998	First Sphere Handbook established	Voluntary, self-regulatory standard with no monitoring requirements Humanitarian Plus.
2002	Child Protection Standards published by Keeping Children Safe	Voluntary, self-regulatory. Humanitarian Plus.
2003	Humanitarian Accountability Partnership (HAP) launched	Voluntary, self-regulatory, with certification scheme. Humanitarian plus.
2003	People in Aid Code of Best Practice in the Management and Support of Aid Personnel developed	Voluntary, self-regulatory standard with no monitoring requirements
2004	Building Safer Organisation Handbook published	Voluntary, self-regulatory standard with no monitoring requirements
2006	INGO Accountability Charter	Peer regulatory, accountability initiative with annual reporting requirements. Humanitarian plus.
2011	Inter-Agency Standing Committee (IASC) Commitments to Accountability to Affected Populations	Voluntary. Signatory at global policy level with no monitoring requirements. Humanitarian plus.
2012	IASC PSEA Minimum Operating Standards published	Voluntary, self-regulatory with no monitoring requirements. Humanitarian plus.
2014	Core Humanitarian Standard of Quality and Accountability launched; Humanitarian Quality Assurance Initiative set up for third party assessment of CHS in 2005	Replaced People in Aid Code of Conduct, Sphere, and HAP. Voluntary, self-regulatory with certification scheme. Annual audits. Humanitarian plus.
2014	Child Safeguarding Standards replacing Child Protection Standard by Keeping Children Safe	Voluntary, self-regulatory with certification scheme. Humanitarian plus.
2017	IASC AAP commitments revised to align with the CHS	Voluntary. Signatory at global policy level with no monitoring.
2018	Quality and Accountability COMPASS revised by Groupe URD to align with the CHS	Voluntary.
2018	Sphere Handbook revised incorporating CHS	Voluntary, self- and peer-regulatory standard. Humanitarian plus.
2018	DFID Enhanced Due Diligence Standards for Safeguarding established	Standard created by the donor for its implementing partners. Humanitarian plus.
2020	Keeping Children Safe's International Child Safeguarding Standards revised	Voluntary, self-regulatory standard with certification scheme. Humanitarian plus.
2024	CHS revised	Voluntary, self-regulatory with certification scheme. Humanitarian plus.

At the organisational level, NGOs voluntarily subscribe to various regulatory frameworks as a way to establish their dedication to accountability (Telesetsky 2011; Crack 2018; CHS Alliance 2022). These frameworks, which range from 'good enough' to 'humanitarian plus' standards (see section 2.3), cover a broad spectrum of self-regulatory standards. They vary from codes of conduct that NGOs can endorse through self-proclamation, with minimal additional requirements and no monitoring or sanction capacities, to certification initiatives that include rigorous verification processes. These latter initiatives are part of the voluntary accountability club known as the 'humanitarian plus' standard. The latter involves standards accompanied by a certification scheme incorporating robust verification mechanisms, offering a concise and potent signal of quality that significantly enhances the NGO's brand reputation (Phillips 2019). A series of accountability club focused studies illustrate that the higher the level of rigorous verification, coupled with stringent adherence to standards, the stronger the perception among stakeholders that these NGOs are operating in an accountable and transparent manner (Brett 1993; Gugerty & Prakash 2010; Bowman 2010).

This diverse range of NGO self-regulation serves to signal reputable credibility to both donors and the public (Tremblay-Boire et al. 2016; Traxler et al. 2018), aiming to "defend against criticism of poor accountability from hostile parties" (Crack 2018: 420). This correlation between rigorous verification, strict standards, and enhanced accountability highlights the intrinsic value of maintaining and demonstrating these qualities within the aid sector. It emphasizes the importance of signalling a commitment to accountability as a strategic response to external scrutiny, safeguarding the NGO's reputation and credibility.

2.3.5. The *'Humanitarian plus'* Core Humanitarian Standard

The Core Humanitarian Standard of Quality and Accountability (CHS) stands as a prime example of the 'humanitarian plus' standard, setting itself apart from previous standards by encompassing a comprehensive range of verifications. This standard, currently recognized as the most widely adopted within the humanitarian sector (Gibbons 2018; Cuaton 2019; Daun 2020; Morais 2021), goes beyond

mere compliance by incorporating rigorous benchmarks, self-assessment mechanisms, external verification processes, and certification procedures.

CHS provides concrete and actionable guidelines equipped with measurable indicators, serving as a valuable resource for NGOs either as a voluntary standard or as a foundational framework for independent verification (CHS Alliance et al. 2014). This multifaceted approach extends beyond the conventional focus on measuring number of items distributed. What makes CHS step up to the status of a 'humanitarian plus' standard is its unparalleled scope of coverage. By addressing critical dimensions including the appropriateness, timeliness, and quality of aid, CHS goes beyond traditional metrics and positions itself as a ‘humanitarian plus ‘standard. Moreover, the robust verification system, coupled with sanction capacities, mirrors the characteristics of an accountability club, placing a distinct emphasis on both standard-setting and enforcement within the humanitarian landscape.

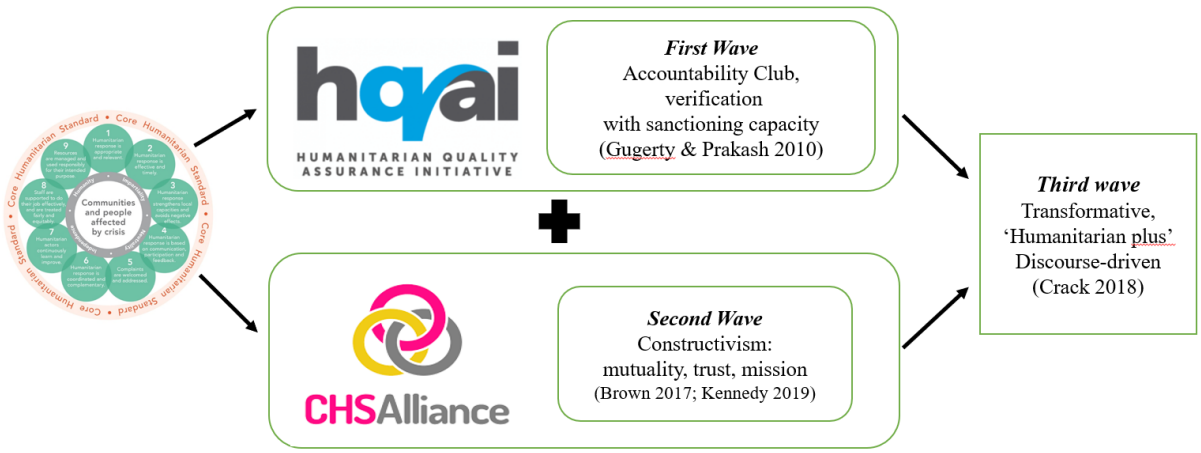


Figure 3. Accountability theoretical framework of the ‘Humanitarian Plus’ CHS

What sets CHS apart even further is its unique architecture, featuring the integration of the Humanitarian Quality Accountability Initiatives (HQAI) and CHS Alliance. As can be seen in Figure 3, the regulatory framework of CHS, through HQAI, conducts rigorous independent quality assurance audits to evaluate NGOs' adherence to the standard, exemplifying manifestation of a voluntary accountability club referred earlier in the chapter. Simultaneously, the collaborative aspect embodied by CHS Alliance fosters the exchange of best practices and cultivates a culture of continuous

improvement. CHS Alliance reflects a constructivist approach, fostering mutual trust and learning with a dedicated focus on missions.

While the prime focus of the standard lies on downward accountability to affected populations, this model of accountability not only injects momentum to prioritise accountability within NGOs and across peer networks, but it also signals improved performance and credibility to donors and the public. The combined approach of the accountability club, represented by HQAI, and the constructivist approach embodied by CHS Alliance, offers a holistic perspective on accountability. This dual mechanism contributes to a comprehensive framework that enhances accountability practices in the humanitarian sector, ensuring both rigorous evaluation and continuous learning and improvement.

Providing that the essence and focus of the CHS sits on downward accountability to affected populations, this ‘humanitarian plus’ standard can be used as an essential blueprint and guideline for aid providers to engage with affected populations. In essence, its emphasis on reflective practice as essential for achieving an organization's mission as well as its focus on prioritising voices and experiences of affected populations, exemplifies the 'third wave' of accountability's broader goals (refer back to section 2.3.2). The thesis now proceeds to explore complaint mechanisms.

2.3.6. Complaint mechanisms and their effectiveness

Central to the concept of downward accountability is the active engagement and responsiveness to the needs of affected populations. This thesis now explores the concept of creating safe spaces where affected populations, who are recipients of humanitarian aid, can freely express their concerns. Complaint mechanisms emerge as a formal means to express concerns and provide a safe avenue for communities to voice valid concerns (CHS Alliance 2018; Tearfund 2021). Recognized as integral to downward accountability, these mechanisms facilitate feedback and complaints about aid services, emphasizing power transfer to affected populations (Edwards and Hulme, 1996; Wood 2011; Karyn 2011; Ground Truth Solution 2021).

The concept of complaint mechanisms has a long history in other sectors. Notably, the public sector (Nel et.al. 2000; Brewer 2007; Harijanti 2020), education (Harrison 2007; Canning 2017; Burt 2018), governments (May 2014; Home Office 2015), and health sectors (Seelos & Adamson 1998; Tahir 2018) have been actively employing complaint mechanisms for many years. In the context of the UK, both the government and police have been subjects of scholarly engagement aimed at supporting the reform of complaint and disciplinary systems. These efforts are particularly concentrated on addressing threats arising from serious and organized crimes, prompted by high-profile scandals that shed light on failures within police forces (Hopkins 2011). This broader historical perspective highlights the universality and cross-sector applicability of complaint mechanisms as a crucial tool for addressing issues including those arising from scandals, enhancing accountability, and fostering improvements in diverse organizational contexts.

Within the aid sector, despite the steady uptake of complaint mechanisms in other sectors, complaint mechanisms are still regarded as an emerging concept with limited scholarly research focus in the aid sector (Berghmans et al. 2017). Through case studies, such as those examining Typhoon Haiyan (Madianou et al. 2016), Tanzanian NGOs (Assad & Goddard 2010), Concern and Mango (Jacobs & Wilford 2010), Action Aid (Walsh 2014), World Vision (McCollim 2019), and the Pakistan monsoon flood response in 2010 (Aijazi 2021), a broader understanding of complaint mechanisms as a part of wider accountability framework has been explored. However, none of these studies specifically address mechanisms designed to receive concerns related to SEA, highlighting a significant gap in the current literature.

The examination of complaint mechanisms of the INGO Accountability Charter (Hielscher et.al. 2022) is one of few studies that focuses directly on complaint mechanisms. This literature highlights gaps in its impact on accountability towards affected populations, particularly with no specific mention of SEA. Thus, the mechanisms through which to capture and address SEA concerns effectively have not been at the centre of scholarly research. This deficiency highlights the need for further exploration and understanding of complaint mechanisms, especially within the context of preventing and addressing SEA in the aid sector.

Complaint mechanisms vary across NGOs. As advised in CHS Commitment 4 and 5, examples include complaint boxes, feedback desks, complaint email addresses, hotlines, home visits, feedback through community leaders and faith leaders, monitoring visits, community reference groups, and radio call-in (Core Humanitarian Standard no date). Each tool offers different accessibility opportunities and challenges to different groups of affected populations (Aijazi 2021). For instance, complaint boxes and complaint email addresses are most accessible to those who are literate, while hotlines and radio call-in may be accessible to those with low literacy but would still exclude those with no access to phone/radio (Bonino & Warner 2014; BOND 2018). This wide variety of complaint mechanisms, while providing various channels for feedback, also raises questions about their overall effectiveness in addressing and mitigating incidents of SEA.

The ineffectiveness of complaint mechanisms within the aid sector has been increasingly documented, as evidenced by a series of NGO reports including the Humanitarian Accountability Report (2018), the Safeguarding Resource and Support Hub Global Evidence Review (2020), and the Office of Internal Oversight Services' Evaluation on PSEA by UN staff (2021). These reports collectively highlight a troubling observation: despite the widespread implementation of complaint mechanisms, there has been no significant reduction in incidents of SEA, nor a signifncant increase in reporting these incidents. This situation sheds light on a critical gap in the effectiveness of these mechanisms.

Shibaike et.al. (2013), who explore definition of effectiveness within the context of aid sector, highlight that effectiveness is merely a theoretical construct but a socially constructed measure of aid providers' tangile impact – in the case of my thesis - on addressing and mitigating SEA incidents through the use of complaint mechanisms. Effectiveness, in this thesis, means the capacity of complaint mechanisms to not only exist as a formalised channel for reporting sensitive concerns but also to function in a manner that is accessible, responsive, and trusted by affected populations. Thus, the effectiveness of complaint mecanism is assessed by their ability to ensure that concerns can be raised by affected populations and that they are adequately addressed, leading to corrective actions aligned with the values and commitments of aid providers.

2.4. NGO accountability for PSEA

2.4.1. Defining SEA and safeguarding

The varying definitions of SEA and safeguarding reflect the complex nature of addressing and preventing these issues. In the UK, statutes emphasize the prevention and appropriate response to the abuse and neglect of children and vulnerable adults (Charity Commission 2019). However, a broader perspective is adopted in this thesis, aligning with the UN's definition of SEA. According to the UN, SEA encompasses "any sexual exploitation, abuse, or harassment of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another" (BOND 2018).

A noteworthy focus of the thesis is on SEA committed by aid providers, including representatives of the host state, UNs and NGOs. This makes our focus distinct from broader sexual violence/gender-based violence which can include sexual violence committed by intimate partners within the context of marriage and practices such female genital mutilation that occur within the domestic sphere (UN Secretariat 2003). These wider examples are not within the scope of the thesis. The 'H' of the broader acronym SEAH – harassment – is also not included in this thesis. This is because it tends to be associated primarily with sexual misconduct committed by aid workers against other aid workers within their workplace, as opposed to misconduct committed by aid workers against members of the communities within which they operate.

Safeguarding, as defined by The UK Collaborative on Development Research (2020), is the collective effort and action to prevent and address SEA. By adopting this comprehensive definition, the thesis acknowledges the multifaceted nature of safeguarding efforts, emphasizing the need for a holistic approach to protect refugee communities and other affected populations.

2.4.2. Safeguarding scandals in 2018: Understanding the perfect storm

NGO accountability for the prevention of sexual exploitation and abuse (SEA) has gathered heightened scrutiny in recent years, particularly in the wake of watershed moments and key safeguarding scandals in 2018. Over the last decade, accountability in the context of SEA has been under intense scrutiny as an increasing number of cases, both historical and contemporary, have come to light. Within the aid sector, reports of SEA first surfaced in the context of peacekeeping missions in 1999, when SEA by peacekeepers during the UN Transitional Authority in Cambodia was exposed (Witworth 2004). The epidemic scale of SEA was globally recognised at the UN level in 2002 when UNHCR and Save the Children identified widespread SEA across their programmes in three West African countries (Defeis 2008; DFID 2018; Evans 2018). The report revealed systematic SEA by aid workers against refugees, including children (UNHCR & Save the Children 2002; Naik 2018).

Since 2002, there has been proliferation of accountability and safeguarding standards to ensure that NGOs 'do no harm' (CHS Alliance 2015; Simpson 2022), falling under the 'humanitarian plus' approach. The pivotal historical moment in 2018 marked a turning point for the aid sector when Oxfam, one of the most reputable NGOs, faced severe scrutiny with headlines such as 'Top Oxfam staff paid Haiti survivors for sex' making front-page news in The Times (O'Neill 2018). The allegations of SEA by Oxfam Haiti expatriate country director Roland van Hauwermeiren and the NGO's mishandling of the allegations soon became the epicentre of a wider sectoral crisis (Cooney 2019a; Aaronson 2018). A subsequent inquiry led by the UK Charity Commission exposed Oxfam's weaknesses and highlighted inadequate resourcing for its quality assurance and accountability systems (Charity Commission for England and Wales 2019).

As Oxfam navigated the overlapping accountability demands of various stakeholders following the SEA scandal, waves of similar allegations unfolded at Save the Children UK and Medecins Sans Frontier. In June in the same year, claims of SEA of local women by Médecins Sans Frontières' staff during the Ebola crisis were also exposed (Cooney 2018). The series of scandals demonstrate systematic challenges in holding aid workers accountable for their unethical, in some cases criminal behaviours.

These incidents have triggered widespread criticism and intense scrutiny from politicians, the public, and the media. They have highlighted significant shortcomings in the management and governance of SEA across the aid sector.

The consequences of a lack of accountability have become increasingly apparent and severe. The issue is no longer confined to hushed conversations at the headquarter offices of large international NGOs. As Doane (2021) notes:

> *"The issue was no longer merely whispered in the hallways of iNGO offices or Southern agencies; they are spoken about — even shouted about — almost anywhere civil society exists" (Doane 2021: 1).*

Critical analysis provided by Philips (2020), an accountability scholar, sheds light on how safeguarding issues have exposed systemic weaknesses in the operating environment of NGOs. He emphasizes the focus on protecting organizational reputations, which, in turn, exerts strong pressures and leads to improved risk management and limited transparency. Essentially, the key safeguarding scandals in 2018 have served as a stark reminder of the urgent need for reform in the aid sector's organizational structures, with inquiries into the incidents and how to avoid future recurrence emphasizing the importance of robust accountability mechanisms, transparent practices, and a cultural shift that prioritizes ethical conduct over reputational management.

2.4.3. Linking SEA and power in the aid sector: The importance of race and gender

The 2018 scandal, which brought to light systemic issues of SEA, prompted an inquiry by the UK Parliament International Development Committee. Their report suggested that SEA was caused/enabled? By deep rooted power imbalances connected to sexism (patriarchy) and racism (House of Commons Library 2020). Across the sector, the boards and leadership positions of UN agencies and influential international NGOs are largely dominated by white males, with women of colour particularly underrepresented in senior roles (Champion 2023). In contrast, the frontline aid workers delivering activities are mostly people of colour. This creates a stark contrast in the gender and racial

characteristics of those in leadership roles, with power imbalances reinforcing a deeply ingrained sexist and racist structure (Crewel & Fernando 2006; Turner 2020; Narayanaswamy 2024).

This cultural dynamic, as exposed by Riley's (2020) study following the Oxfam safeguarding scandal in 2018, facilitates an environment where abuse and exploitation can occur without consequences for the perpetrators. Riley (2020) emphasizes that the abusive behaviour of men in the sector is shaped and enabled by race, class and gender inequalities. Furthermore, Gillespie et al. (2019), who examined #MeToo and #AidToo from a feminist theory perspective, highlighted the patriarchal context that enables SEA to persist. They also argue that the dominant power hierarchies that prevent victims to speak out about their abuses as aid workers in power "are protected by their image as humanitarian saviours" (Riley 2021: 2). This specific interplay of racial and gender dynamics not only fosters an environment where SEA can persist but also instils a pervasive fear among victims that if they do make allegations then they may not be believed. In essence, the profound imbalance in power within the aid sector contributes significantly to perpetuating an atmosphere that tolerates and enables abusive practices.

UN Secretary-General's reports (2018; 2019; 2020) also stress power abuse and gender bias as both root causes and consequences of SEA (Harrington 2021). This view is not new and has long been advanced by activists and whistleblowers, whose knowledge and practice provide crucial insights into the theorisation of accountability and power in safeguarding. Alexia Pepper de Caires (Edward 2018), Shaista Aziz (2018), and Angela Bruce-Raeburn (2018) among many others, have repeatedly highlighted impacts of power imbalances and "systems of oppression (racism and sexism) and privilege structuring the aid system" (Daoust & Dyvik 2021: 5).

Abundant feminist scholarship has long demonstrated the central role gender constructs play in understanding causes and behaviours of SEA in relations to the performance of masculinity (Connel & Messerschmidt 2005; Higate 2007; Kirby 2005; Wilson 2013). Feminist researchers have also continued to highlight the gendered power structure that is embedded within the aid sector, reinforcing masculine principles and subordinating women (Kanter 1977). Lokot (2021), who conducted research

on gender mainstreaming and organisational culture in the aid sector using feminist approach, demonstrated how gendered power hierarchies shape organisational culture. Goetz (1997) points to the aid structures and norms that are reinforcing gender inequalities within NGOs while Rao and Kelleher (2000 2003) reveal unspoken norms and invisible power (discussed in more depth in section 2.6) that shape the 'deep structure' of NGOs. NGO reports, such as Oxfam research report (2021) with case studies of Myanmar, Iraq, and Ghana, offers empirical evidence of gender power dynamics perpetrating marginalisation of women and girls. Recent debates on intersectionality and race, particularly in the context of calls for localisation and decolonisation of aid, further illuminate these issues (Patel 2020; Miller 2020). This approach allows for a deeper analysis of how various forms of power, gender and race intersect and impact the experiences of different individuals and groups. By bringing to light the often-invisible power dynamics and unspoken norms, this approach emphasizes the need to dismantle entrenched power structures and promote a more equitable distribution of power that acknowledges and addresses both racial and gender-based inequalities (Krause 2021). By incorporating this lens, the aid sector can better address the diverse and interconnected forms of oppression that affect different groups.

In exploring the causes and characteristics of SEA in the aid sector, this thesis recognizes the importance of gendered and intersectional perspectives that highlight connections with a range of power hierarchies (Crenshaw 1991; Tariq & Syed 2017; Lokot 2022). However, it intentionally moves beyond attributing the reoccurrence of SEA solely to masculinity and gender norms manifested through individual perpetrators, as such an approach might inadvertently obscure the crucial aspects of individual and collective accountability. Instead, the thesis adopts a broader perspective from power scholarship to critically analyse the conceptualization and application of safeguarding and accountability (discussed further below in Chapter 2 section 2.6 and Chapter 4 section 4.3).

2.5. NGO accountability for PSEA in displacement settings

In exploring complaint mechanisms and safeguarding failures, the thesis focuses on refugee camps in displacement setting, for this fragile context exemplifies settings that create a permissive environment

whereby SEA flourishes (UNHCR; IASC AAP 2018). Firstly, this section briefly examines the definition of refugees and then explores characteristics of refugee camps that contribute to SEA. Then, following the same approach as the two previous sections, this section dives into the question of 'accountability to whom' in the context of refugee camps, detailing the multi-layered accountability mechanisms that have been adopted in such settings. Finally, the section discusses multiple dimensions of power manifested in this context.

The thesis employs the definition of refugees adopted by UNHCR as

> *"a person who is outside his or her country of nationality or habitual residence; has a well-founded fear of persecution because of his/her race, religion, nationality, membership in a particular social group or political opinion; and is unable or unwilling to avail himself/herself of the protection of that country, or to return there, for fear of persecution" (The 1951 Convention relating to the Status of Refugee).*

The thesis focuses on refugees as those who reside in refugee camps designated by the host states, as opposed to individual refugees who settle in urban settings or within host communities. In this particular context, a high level of accountability in prevention of SEA would be indicated by a situation whereby refugees are empowered to engage with aid providers (host states, UNs, and implementing NGOs) and utilise complaint mechanisms to report SEA cases.

2.5.1. Risks and vulnerabilities of refugees to SEA

Established by the host state with coordination led by UNHCR, refugee camps are places of refuge for people affected by forced migration. Despite the well-intended support from the host state, refugees remain highly vulnerable, including to SEA (Simon-Butler & McSherry 2019). With reduced access to basic needs, loss of community and family structures, lack of social cohesion and access to justice, refugees face multiple challenges to meet their basic needs and rebuild their lives (Wirtz et al. 2013). Aubone and Hernandez (2013) who assessed refugee camp characteristics and the occurrence of sexual violence in Dabaab camp, Kenya highlighted how refugees' living circumstances increase their vulnerability to sexual violence, especially when they leave the camp in search of necessary resources

such as fuel and construction materials. Kwiringira et.al.'s study (2018) also emphasized the poor set up of facilities such as public toilets with gender-segregated facilities, specifically that they do not accommodate needs of women and girls in the camps. Research undertaken in various locations including Syrian refugee camps in Jordan (Al Akash & Boswall 2016), Uganda (Kwiringira et al. 2018; Goodman & Mahmood 2019), and Ethiopia (Wirtz et al. 2013) have all come to similar conclusions.

The high vulnerability to SEA which affects female refugees has been widely researched and documented by numerous scholars (Walker 1995; Murray 2000; Olivius 2014; Nordby 2018; Goodman & Mahmood 2019; Pertek et al 2021). Gender plays an important role in this context as women and girls, in particular, are deeply affected by displacement and are considered one of the most vulnerable groups due to economic dependency, physical insecurity, and pervasive patriarchal culture and social norms (Mootz et.al. 2017). Displacement not only reduces fulfilment of basic needs but also causes disintegration of communities and families. Murray (2000), whose research examined human rights implications and accountability for SEA at refugee camps, highlighted that male family members are often killed in fighting, leaving female family members as heads of households. This not only results in the loss of financial stability for female-headed households but also increases the risk of exploitation as women may be forced to navigate such precarious situations by making them more vulnerable to various forms of exploitation in the challenging environment of refugee camps. This is a long-term concern raised by scholars, as evidenced by the work of Bulcha (1987), who conducted research on integration of refugees in Um Rakuba Camp, and found that lack of economic opportunities for women led to many resorting to undesirable means such as transactional sex out of necessity.

The Women's Refugee Commission (2010) further revealed that these vulnerabilities are intersectional. Women with disabilities have higher likelihood of experiencing SEA, highlighting the 'triple marginalisation' confronted by displaced women with disabilities due to their status, disability and gender. Murray argues that their ability to "remedy these problems through legal or other means is inhibited by impoverishment, inability to speak the local language where they have resettled, and fear of authorities, including the police and courts" (Murray 2000: 997). Such unstable environments reinforce patriarchal culture and aggravate women's existing cultural vulnerabilities to SEA (Farmer

2006). The International Rescue Committee (Wulbercq 2023) observed that unaccompanied children, lacking the safeguard of an adult, face increased vulnerability to exploitation, trafficking, and various forms of abuse. Moreover, the permissive environment is further reinforced by a lack of enforcement of laws or policies designed to protect refugees (Murray 2000). As a result, women and girls have long been vulnerable to physical and sexual violence and discrimination across their daily lives within refugee camps (Langlois et. al. 2016; Pertek et. al. 2022).

2.5.2. Fragmented patchwork of accountability mechanisms at refugee camps

Accountability mechanisms in the context of displacement are complex. As sites of refuge for displaced populations, refugee camps represent a critical intersection of human rights, international law, and humanitarian imperatives. Due to the presence of numerous stakeholders, each having their own set of demands and expectations, there is an obligation for all involved parties to maintain accountability towards a diverse group of stakeholders. Compared to other contexts whereby NGOs and local civil society have more direct relationships with communities affected by crisis, refugee camps offer a much more complicated patchwork of relations, creating a variety of implications for accountability mechanisms. The following sections therefore examine the web of accountability mechanisms established by the three key actors in refugee camps, namely the host state, the United Nations High Commissioner for Refugees (UNHCR) and implementing NGOs. The thesis argues that no single actor takes on complete duty-bearing responsibilities or accountability, and that this is due to both the dominant emphasis on upward accountability at all levels of the power structure within refugee camps, and to lack of enforcement of laws against the aid providers.

Host State

The accountability of host states within the context of refugee camps is a multidimensional and evolving issue of paramount significance as they hold an influential role in protection of refugees together with UNHCR and NGOs. The Handbook for the Protection of Displaced Persons by Global Protection Working Group states the following:

> *"States have a responsibility to ensure the full and equal enjoyment of human rights of all individuals on their territory or under their jurisdiction. This duty extends to all agents of the State, including the military and the police, and all public authorities, whether at the national, regional or local level" (2010: 24).*

As such, the host states are entrusted with the responsibility of providing a safe haven for refugees and are inherently accountable to a diverse array of stakeholders, including NGOs, refugees themselves, and the global community at large.

A wealth of academic literature has however showcased deficiencies in their accountability mechanisms, notably in terms of downward accountability toward refugee communities. These deficiencies include a lack of meaningful participation, limited information sharing, inadequate protection, and a disregard for refugees' voices and needs. For instance, Farmer's study (2006) which explored protection of refugee women in Guinea's refugee camps indicated that the Guinean government provided no practical protection for refugees. It found a lack of assurance that crimes are reported and laws enforced. Kivilcim (2016), who examined violence against Syrian female refugees in Turkey, also revealed that Turkish government persistently refused to provide necessary protection to refugees, arguing further that the Turkish government is no exception and similar to other governments. As a result, a lack of accountability for the persistent unethical behaviours of host states and their representatives towards refugee populations continues to be criticised.

Within this context, the accountability spectrum encompasses the host state's obligations as well as the role of UNHCR. While host states are entrusted with providing secure environments, UNHCR's accountability extends to coordinating assistance, fostering collaboration, and ensuring that the protection needs of refugees are met effectively, thereby forming a cohesive approach to safeguarding within these intricate settings.

UNHCR

The Office of the United Nations High Commissioner for Refugees, more commonly referred to as UNHCR, is another key actor who influences protection of refugees across the globe. UNHCR comes into play when the host state lacks the capacity to protect refugees' rights and dignity (Pallis 2005). The

agency has an operational role that encompasses full responsibility and accountability to the international community for all aspects of the complete life-cycle of a refugee situation (UNHCR Partnership). In practice, UNHCR is the first frontline agency that refugees encounter as they arrive at refugee camps and is in charge of refugee camp management, refugee status determinations and inter-agency coordination with implementing NGOs in order to ensure safety and livelihood of refugees (UNHCR 2004). In this sense, the agency has a quasi-state role – acting in a governmental capacity for camp management but also as a gatekeeper who determines who is entitled to protection (Farmers 2006; Pallis 2005).

Many scholars have investigated the roles of UNHCR and its implications in variety of arenas within displacement. Scholars such as Loescher (2001), Steiner et.al. (2003), and Betts et. al. (2012) highlight the institutional dynamics between the host states, donors, and UNHCR, which creates implication for accountability to refugees. Wilde (2005), Pallis (2006), and Lewis (2012) add a perspective of international law in examining UNHCR's accountability. Another key group of scholars contributes from refugee studies (Verdirame and Harrell-Bond 2005; Kagan 2006; Boeyink & Falisse 2022; Ekoh et al. 2023) identifying failures of UNCHR in protecting refugee rights from the beginning of refugee status determinations to their experiences during their lives in the camps. Meanwhile, scholars in migration studies explore the role of UNHCR from the perspective of global governance (Scheel & Ratfisch 2014; Fakhoury 2019; Pham & Luengo-Oroz 2023) and repatriation (Long 2012; Omata 2013; Hyndman and Giles 2016; Um 2023).

Due to its significant responsibilities that have direct impacts on the lives of refugees, UNHCR plays a critical role in accountability mechanisms of refugee camps (Crisp 2001; Pallis 2005). At the organisational level, the agency is equipped with three key accountability mechanisms, namely i) the Office of Internal Oversight Services, ii) the Inspector General's Office for the UNHCR, and iii) the Evaluation and Policy Unit. The three key formal accountability mechanisms above are designed to hold UNHCR accountable, however they are predominantly top-down tools which owe accountability to those who have delegated power – in other words, upward accountability. While the Office of Internal Oversight Services and the Evaluation & Policy Unit operate at the global, organisational level with no

direct engagement with refugees, the Inspector General's Office for the UNHCR engages with reported cases of allegations and occasionally follow up with complainants (United Nations General Assembly 2020). Its reporting channels are publicly available online with a clear case management process. Its policy clarifies that this complaint mechanism is to report concerns of "possible misconduct of any UNHCR staff member or other person/entities with a contractual relationship with UNHCR. Anyone can contact the IGO if they have reason to believe that a staff member or another person associated with UNHCR has not behaved correctly" (UNHCRa, no date). Separate from these mechanisms, UNHCR established the 'SpeakUp! Helpline' in 2018, dedicated to receiving concerns from UNHCR staff members who wish to report misconduct; however, this is not accessible by affected populations (UNHCRb, no date; UNHCRc no date).

Despite its sustained commitments and efforts on downward accountability, UNHCR continues to be criticized for its inadequate accountability in practice. In 2011, Dunlop (2011) argued that UNHCR had not developed an adequate theoretical underpinning, or relevant mechanisms and processes, for enhancing downward accountability. UNHCR's own internal accountability report (2014) builds on this finding and reveals that its system of accountability is not captured in a single tool or document but rather a messy, vast box of collection of policies, procedures, and guidelines (UNHCR 2014). Sandvik & Jacobsen (2016) subsequently reviewing UNHCR's policies and documentations within the arena, still claimed a lack of clarity in UNHCR's definition of 'downward accountability' and insufficient critical reflection on accountability for what and for whom. This persistent gap presents a significant risk of confusion as to how the internal system converges to create a consolidated and mutually reinforcing approach towards downward accountability.

Notably in practice, UNHCR is not adequately held accountable for failing to protect refugees from harms resulting from its own activities or those associated with its personnel (Sandvik & Jacobsen 2016). Going back decades, scholars who examine the lives of refugees have exposed unethical behaviours of UNHCR staff towards refugees and criticise the systematic lack of sanction for such misconduct (Hannan 1997; Verdirame 1998; Harrell-Bond 2000). More recently, Harrell-Bond (2022) argues that such incidents continue to be rarely reported via the existing accountability mechanisms.

Murray (2000) further critiqued the content of the downward accountability efforts, claiming that these mechanisms in 2000 offered limited opportunities for refugee participation. This was reinforced two decades later loud and clear by Mark Lowcock, Under-Secretary-General for Humanitarian Affairs and Emergency Relief, who proposed to establish an Independent Commission for Voices in Crisis in response to data that indicated systematic lack of downward accountability to affected populations including refugees (Wintour 2021).

From a legal perspective, while UNHCR is mandated to ensuring that states adhere to the principles outlined in the foremost key treaties - the 1951 Refugee Convention and its 1967 Protocol, it does not possess the authority or mandate to enforce international law or directly hold states accountable for their compliance with all aspects of international law outside of its specific mandate on refugees and stateless persons (United Nations 1967; Simeon 2013; Thimm-Braun 2020)[5]. Its existing accountability mechanisms, therefore, do not adequately contribute to accountability to refugees (Verdirame & Harrell-Bond 2005; Malkki 1996; Farmer 2006) and can only enforce existing policies designed to reduce SEA (Farmer 2006; Johansen 2020; Division of International Protection UNHCR 2022). Bender (2021) puts it bluntly that UNHCR is accountable to the donors and "to them, little matters other than the food per refugee ratio" (15).

Accountability goes beyond the responsibilities of the host state and UNHCR at refugee camps; it also encompasses the vital contributions of NGOs in ensuring safeguarding measures. While host states and UNHCR bear the legal duty of ensuring the safety and well-being of refugees, NGOs further contribute to accountability by actively implementing safeguarding measures and providing direct assistance. In doing so they are, at least in theory, collectively shaping and delivering a comprehensive framework for protection within these complex environments.

[5] The 1951 Refugee Convention relating to the Status of Refugees and its 1967 Protocol relating to the Status of Refugees are the foremost treaties dealing with international refugee law. The 1951 Convention and 1967 Protocol are the "global instruments setting out the core principles on which the international protection of refugees is built. They have a legal, political, and ethical significance" (Turk & Nicholson 2003). It provides a definition of who a refugee is and their rights and explains the mandate of UNHCR (Betts 2009).

NGO

NGOs hold significant operational roles in refugee camps and function as frontline agencies who organise and deliver aid distribution. While UNHCR manages the overall allocation of aid distribution within camps, such as designating particular sections of the camp to specific NGOs or assigning specific sectors to particular organizations, the responsibility for beneficiary selection and distribution itself lies with implementing NGOs. These NGOs, guided by their own criteria, exercise direct control and power over aid distribution, ensuring effective assistance to individual refugees. Recognizing their moral duty to protect and uphold the human rights of refugees, NGOs share a significant responsibility in safeguarding this vulnerable population (Bouchet-Saulnier 2003).

However, a growing body of literature continues to demonstrate a disjuncture between policy and practice on NGO accountability to refugee populations (Ebrahim 2003; Kilby 2005; Aijazi 2021). Anderson et.al. (2012), who analysed testimony from over 6,000 aid recipients across the globe, illuminated the distorted nature of accountability with robust evidence. They revealed that NGOs, to secure funding, must meet donor requirements but are not obligated to seek approval from refugees, creating an accountability gap. Martin & Brown's (2021) case study on Ugandan refugee camps further exposed the negative consequences of prioritizing upward accountability. Their empirical evidence on their focus for visibility and logos to fulfil donors' requirements revealed NGOs' priority towards upward accountability, neglecting downward accountability to and protection of refugee communities as well as peer and internal accountability. This empirical evidence demonstrates a pervasive gap between the rhetoric and practice of accountability within scholarships of forced migration and refugees.

This is highly detrimental in the context of safeguarding. The absence of refugees' voices in safeguarding mechanisms not only weakens the overall effectiveness of protection measures but also perpetuates a sense of disempowerment and mistrust among refugee communities. When refugees' voices go unheard, it creates a situation whereby perpetrators are not held responsible for their misconduct or actions towards refugees (Ferris 2007; Murray 2000; Human Rights Watch 2014). This lack of accountability fosters a sense of impunity among perpetrators, leading them to believe they can

act without facing any repercussions for their behaviour. Kwiringira et al. (2018), who studied experiences of gender-based violence among refugees across four refugee camps in Uganda, described a culture of silence, stressing the powerlessness of refugees and arguing that this resulted in a deficiency of accountability. This finding was repeated in the systematic review on gender-based violence among refugees across Sub-Saharan Africa (Fry et al 2019) as well as individual case studies of Ethiopian refugees (Tefera 2022), Syrian refugees (Al-Natour et al. 2019; Usta et al. 2019), and Burmese refugees (Jops et al. 2016) among many others.

While NGO accountability for PSEA involves safeguarding measures by individual NGOs, collective accountability extends beyond NGOs to encompass the efforts of the Inter-Agency Standing Committee PSEA Network. While NGOs play a critical role in implementing on-the-ground protection measures, the Inter-Agency Standing Committee contributes to accountability by setting overarching guidelines and standards. This collaborative approach ensures that the expertise and resources of various stakeholders, including NGOs and UNHCR, are channelled toward a cohesive and comprehensive safeguarding strategy. The role of the Committee is pivotal in upholding accountability across the spectrum of organizations involved, reinforcing the collective commitment to the safety and dignity of refugees within these complex environments.

Inter-Agency Standing Committee on PSEA

The Inter-Agency Standing Committee (IASC) is an inter-agency coordination forum for policy development and decision making among key UN agencies and NGOs under the leadership of the UN Emergency Relief Coordinator. Created by United Nations General Assembly Resolution 46/182 in 1991, the IASC is the highest-level and longest-standing humanitarian coordination forum of the UN system (IASC Homepage; Foran et. al. 2012). The objectives of the Task Force are “to foster accountability and protection at all levels of the humanitarian system; encourage institutionalisation of AAP and PSEA, and support operationalisation” (Inter-Agency Standing Committee). Within the Task Force there is a dedicated IASC PSEA Field Support Team who provides technical support at country level in order to deliver IASC PSEA priority outcomes at the field level. This section examines literature on this collective body, specifically in relation to its work around accountability in PSEA.

While there is vast amount of literature addressing the roles of the IASC as a collective policy response from the UN (Fraulin et.al. 2021), only a very limited body of scholarship specifically examines its PSEA Network. NGO practitioner-led reports such as IASC External Review: Global Report on PSEA (2010; 2021), shed light on progress and challenges of the work of IASC PSEA Network at the operational level; however, academic attention on this body has been extremely limited. This thesis seeks to address this gap, contributing further to the findings from Kihara-hunt (2017) on the significant inconsistencies and confusion on coordination and safeguarding case management from the lens of criminal accountability and the UN police.

The section above outlined the multi-layered accountability mechanisms involving host states, UNHCR, NGOs and IASC PSEA at refugee camps. This form of exploitation intersects intrinsically with the complex dynamics of power that are both inherent and prevalent within these environments. As discussed earlier, scholars have suggested through individual case studies and comparative analysis across cases that power dynamics between aid workers and affected populations influence the type, accessibility, use and ultimately the effectiveness of accountability mechanisms. As contended by one leading accountability scholar, accountability is about "relationships of power among multiple organizational actors…a system of multidirectional and contingent relations'' (Ebrahim 2005: 82). Distortion of power dynamics is particularly magnified when examining SEA within the refugee camps.

2.6. Power dynamics within the aid sector

The implications of power imbalances between refugees and those tasked with supporting them for accountability has attracted significant scholarly attention (Makuriwa 2006; Capjon 2007; Bondokji 2016). By drawing on insights from the power literature to analyse experiences of downward accountability, a deeper understanding of the intricate dynamics of accountability mechanisms emerges. Walsh's (2014) research, focusing on the practice of downward accountability using Action Aid as a case study, strongly asserts that achieving downward accountability is highly improbable without a fundamental shift in power dynamics away from donors and NGOs towards the affected populations.

Building on this argument, Harrell-Bond (2002) and Martin et.al. (2021) contend that the fundamental structure of the aid sector inherently skews accountability towards donors, shaping NGOs' primary sense of accountability to these funding entities. McGee's (2020) study on a marginalized, remote community's interactions with states and NGOs in the south-western Colombian Andes further supports this perspective, emphasizing the need to address accountability and power simultaneously.

This message was repeatedly trumpeted by practitioners who became whistleblowers on the systematic nature of power imbalance that exist within the aid sector. Helen Evans, the former UK Whistleblower of the Year and Global Head of Safeguarding at Oxfam (2023), asserts in her interview with the charity promoting the rights of whistleblowers, called Parrhesia Inc., for the episode on whistleblowing within the aid sector:

> *"Wherever you have people in positions of power, there's always going to be a risk of abuse and in the aid sector, and there will always be perpetrators attracted to it for that reason" (Parrhesia Inc 2023).*

This collective body of research reinforces the assertion, echoed by both scholars and practitioners (Peixoto and Fox 2016; McGee 2020; CHS Alliance 2022), that accountability is fundamentally intertwined with the responsible use of power.

This recognition has given rise to a societal movement within the community of practitioners, marked by the emergence of the 'Power Shift' movement. This movement, gaining traction among those actively engaged in the aid sector at the time of Global Summit of Community Philanthropy in 2016, advocates for a profound re-evaluation and redistribution of power structures within the realm of international aid and development. In this transformative movement, key activists and organizations, including Adeso, Peace Direct, Right CoLab, RINGO Project, Alliance for Peacebuilding, and Women of Colour Advancing Peace and Security and many others have played a pivotal part in shaping the discourse and advocating for tangible changes (van Selm 2023; Peace Direct 2023). By actively participating in the PowerShift movement, the like-minded organizations strive to dismantle existing structures that perpetuate power imbalances, pushing for a more equitable distribution of influence and

decision-making within the aid sector. This growing awareness among practitioners has highlighted the urgency of addressing distorted power dynamics as an integral part of fostering accountability in the realm of aid sector.

2.6.1. Power imbalance and SEA

The power imbalance between aid workers and affected populations has been long researched and these studies have generated disturbing findings. For instance, multiple studies (Kovatch 2016; Lopez 2015; Shrestha 2011) indicate the misuse of social and economic power by aid workers, based on "a supply-demand cycle whereby food or money is exchanged for sex" (van der Mark 2012: 8). One research study describes interactions between aid workers and affected populations as 'inhumane' (Harrell-Bond 2002) while another study exposed significant magnitude of abuse of power by aid workers over refugees documenting widespread instances sex in exchange for aid at camps in Greece (Digidiki & Bhabha 2017).

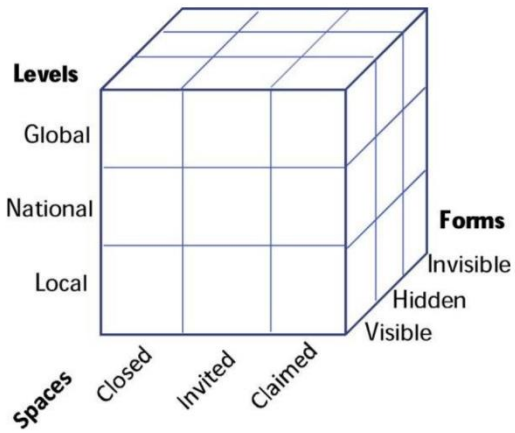
With fear of biting the hand that feeds them, affected populations often find themselves in a weak position to raise their voice and concerns, let alone disclose sensitive matters such as SEA. The aid journalist company, New Humanitarian, revealed in their examination of exploitation and abuse in the aid sector, that "the social and economic power that humanitarians have in comparison to the communities they serve creates circumstances in which transactional sex can become embedded in local economies" (Mednick & Craze 2022).

Similarly, the Humanitarian Accountability Report (CHS Alliance 2020) and Global Safeguarding Review (Safeguarding Support and Resource Hub 2019) acknowledge the challenges of limited bargaining or negotiating power that affected populations have over NGOs. This assertion is supported by the scholarly evidence. On the theoretical side, Harrell-Bond (2002), who examined accountability logics of NGOs as givers/helpers and refugees as receivers/recipients, argues that "anything that impedes the appearance of fully equivalent exchange…can result in the receiver ceding status or power to the giver" (2002: 2020). Ferris (2007) who conducted global research on abuse of power in SEA also elaborates on high vulnerabilities of the victims, resulting in hindrance for reporting.

In the context of imbalanced power dynamics present in humanitarian assistance, the act of engaging in the exchange of sexual favours for materials goods may obscure the reality that people facing these exploitative circumstances often lack meaningful choices (Spencer 2005). As a result, this fails to address power imbalance and inequality underpinning the wider structure of the aid sector, adversely creating a permissive environment in which those in power can take advantage, leaving communities feeling a sense of powerlessness and silencing those most vulnerable (Westendorf 2017; Daoust & Dyvik 2021).

2.6.2. Conceptual and analytical framework of power: Gaventa's powercube

It is widely recognised that power is a complex concept which was been widely theorised in depth from a wide variety of perspectives (Digeser 1992; Haugaard 2003; Gaventa & Barrett 2010; Luttrell et al. 2009). Traditionally, many power scholars including Lukes (1974) and Cornwall (2002) regard power as a form of agency – as the ability of one to dominate others against their interests and influence values and beliefs. Robert Dahl (1961), one of the early key influential power scholars, famously described that "A has power over B to the extent to which he can get B to do something that B would not otherwise do" (Dahl 1957: 202). His concept continues to underpin definitions of power by majority of power scholars. Drawing on his original theory, Lukes (1974) and Gaventa (1980) developed a more in-depth framework of power, including three faces of power (Mille at al. 2006), power as contested concept (Lukes 1974; 2005), and practical power theory (McGee 2020).



Source: Gaventa (2006)

Figure 4. Powercube

In the trajectory of power theories' development, from my perspective, the powercube framework appears to emerge as the culmination of accumulated knowledge, building upon the foundations laid by earlier scholars in the field. Recognizing the comprehensiveness of Gaventa's powercube in its analytical scope, this thesis aims to apply the powercube approach with gender sensitive perspective to examine logics and spaces of accountability in the context of safeguarding. This approach ensures that the analysis acknowledges and examines specific ways in which gender influences power dynamics and accountability structures, revealing the ways in which gendered power relations contribute to systematic safeguarding failure in refugee camps in Sudan (see Chapters 5 and 6). This perspective specifically highlights how women and men experience and navigate power differently, and how these experiences shape their vulnerability and agency within these settings. The gender-sensitive analysis thus provides insights into the intersection of gender with other social categories, such as age, ethnicity, and socio-economic status, to offer a comprehensive understanding of the complexities of safeguarding failures.

The powercube approach, influenced by the earlier work of Lukes (1974), is underpinned by belief that power manifests in multiple dimensions and operates in complex manners. It highlights three types of power – *forms* (visible, hidden and invisible), *spaces* (closed, invited, and claims), and *levels* (global, national, local, and household). Within *forms* of power, visible power involves authorities with procedures of formal decision-making which are easily observed (Bradley 2020). It is often seen as "closed, corrupt, and unrepresented" (Bradley 2020: 104) with significant gaps between laws and practices. Hidden power operates behind the scenes, shaping the agendas, issues and options available for decision-making (Gaventa 2002). In reality, it can lead to exclusion of the voices and concerns of other less powerful groups, effectively shaping the outcomes to favour established interests or the status quo. (VeneKlasen 2020).

Invisible form of power is deeply ingrained in social structures, norms, and institutions. Often identified as one of the more difficult forms of power to understand (Scott-Villiers and Oosterom 2016), it shapes the conditions under which decisions are made and influences people's behaviours and perceptions, often without their conscious awareness. VeneKlasen (2020) characterises invisible power as "psychological and ideological boundaries of change, including people's beliefs, acceptance of the

status quo, and sense of superiority or inferior as natural" (2020: 71). This invisible power relates closely to ideas of power debates widely used in feminist analysis (Rowlands 1997). In this research, the powercube analysis highlights the impact of hidden and invisible power dynamics in exploring violence against women (Pearce and Vela 2005). Thus, it is particularly useful for analysing the structure and inequalities that make women and girls more vulnerable to SEA within my case study of the refugee camps (see Chapter 5 for detailed analysis based on the powercube in the context of refugee camps in Sudan).

Spaces of power identified in the model are threefold: closed, invited, and claimed. Within closed space, decisions are made without consultation or participation. Invited space indicates the importance of involving marginalised groups of communities in consultation, however this often takes place within set boundaries (Gaventa 2002). Within claimed space of power, vulnerable groups are able to assert their agency and sense of autonomy. It represents an area where stakeholders create their space to shape their own agenda. Cornwall (2001) demonstrates in research on power analysis that exploration of spaces of power allows reflections of "a spectrum of possibilities that interact with one another, opening and closing the entry points for influence and transformation across different levels of power" (Gaventa 2020: 118). Furthermore, drawing from Bradly (2020)'s approach, the thesis recognises the concept of power as "dynamics, relational, multidimensional forms that can range from domination and resistance to collaboration and transformation" (Bradly 2020:103). It stresses the importance of spaces where power is exercised and maintained to shape decision-making, access resources, and influence society across boundaries and at different *levels*, from global, national, **and** local, **to** household.

The final dimension of power is a set of multiple *levels* of power – from global, national, and local. A traditional powercube model stresses of global (decision-making beyond the nation state); national (government and other forms of authorities at country level); and local (sub-national authorities). A household level is also added into this analysis to more explicitly highlight the micro level of gender relations often hidden from public spaces within household, domestic level (Pearce and Vela 2005; Gaventa 2019). This incorporation stresses the importance of examining power dynamics at all levels to achieve a comprehensive understanding of gendered power relations.

Using this framework, this thesis examines how power was exercised at the global level by stakeholders including executive board committees and those involved from the headquarters and country offices as the accountability standard (in this case CHS) was crafted and designed to understand framing of accountability. The gendered implications of decision-making were also manifested in the gender dynamics of the committee which was dominated by Western, White men. It also examines the power interplay of stakeholders within the refugee camps, to analyse the extent to which different forms and spaces of power are shifted by complaint mechanisms. This approach opens up possibilities for mobilising alternative forms of power and re-shaping deeply embedded social norms in order to improve the effectiveness of complaint mechanisms and improve downward accountability.

2.6.3. Applying the power cube to analyse SEA in refugee camps

Power dynamics within refugee camps have long been debated by scholars researching women's participation and empowerment (Turner 2001; Bakewell 2003; Kaiser 2004; Kreitzer 2002); gender-based violence (Abdi 2006; Behera 2006), and trafficking (Achvarina & Reich 2006) among others. This thesis builds on this literature by applying the powercube as its theoretical framework to analyse power dynamics in refugee camps.

The powercube offers a useful conceptual model that facilitates deeper analysis of the forms of power and its implications for preventing and tackling SEA. It has been widely utilised to analyse power as root causes to respective social issues. For example, Gaventa's powercube framework was used to analyse how local participation of refugees influences the national electoral leadership positions in Uganda (Baguma 2020). Larkin & Clark (2017)'s study on Dadaab refugee camp in Kenya utilised Gaventa's powercube framework to explore how refugees assert their agency within the limited confines of the camp in Dadaab Refugee Camp. Thus, the powercube has been widely adopted and adapted by researchers to analyse power structures and their implications.

The gender-sensitive powercube approach acknowledges that power is not only a central component of social structures but also pivotal in shaping gender identities and relations. By recognizing that power influences how gender is socially constructed, experienced, and exercised, the thesis delves deeper into

the ways gender intersects with various forms of power—visible, hidden, and invisible. This approach enables a comprehensive understanding of how entrenched gender inequalities are perpetuated and how they impact the lived experiences of refugees, particularly in relation to issues such as sexual exploitation and abuse (SEA). Through this lens, the analysis provides a nuanced perspective on the interplay between power and gender, highlighting the need for gender-responsive strategies to address and mitigate power imbalances within refugee camps.

Within the complex setting of refugee camps, power imbalances play a pivotal role in shaping the vulnerability of refugee populations to the grave threat of SEA. Visible power in the refugee camps is often held by the host states (Wilde 1998; Farmer 2006; Pallis 2005). Their power allows the host state to corrupt the law enforcement (Kinchin 2016) and unrepresentative (Verdirame 2011), creating gaps between law and practice (Lomo 2009). As validated by Harrell-Bond and Guglielo (2005), who conducted a long-term ethnographic study of violations of rights of refugees in Kenya and Uganda, visible power held by host states and UNHCR facilitates an environment where perpetrators exploit their positions of authority and influence to manipulate refugees with less power. Therefore, when host states and UNHCR do not exercise their visible power responsibly, vulnerabilities of refugees intensify, creating an environment where exploitation and abuse are more likely to occur. This was demonstrated in a study by Agier (2011) who examined refugee camps in Zambia and exposed that "violations of human rights, including sexual exploitation, were perpetrated with full impunity" (2011: 85). It validates the point above on the inadequate implementation of international refugee laws.

A focus on the hidden forms of power highlights the unseen influence that stakeholders have – in this case we are primarily concerned with the influence of UNHCR, NGOs (Miller et al. 2006), and sometimes community leaders (VeneLiasen 2020). It often occurs in the "backstage, away from the spotlight and outside of visible forums of decision-making" (Kamanzi 2012: 123). Although community leaders are intended to serve as representatives for refugee populations to ensure their voices are acknowledged, in practice, they often fail to accurately reflect the community's diverse needs, including addressing SEA.

Moreover, hidden power shapes cultural norms and expectations on acceptable behaviours, creating a culture where discussing SEA is stigmatised, perpetuating victims silencing and maintaining power imbalances. This environment fosters stigma, shame, and fear of reprisals or threats of rejection by families and communities, further compounding the challenges faced by survivors in speaking out and seeking justice (Aubone & Hernandez 2013; Hossain et.al. 2018; Muuo et.al. 2020). Muu et.al. (2020), who examined gender-based violence in Dadaab refugee camp, demonstrated how cultural norms can significantly influence the responses to, and the acknowledgment of abuse.

Lastly, the invisible form of power is crucial in the shaping of meaning and in determining what is considered acceptable, both behind closed doors and on the ground outside institutions of power. In the context of refugee camps, it encompasses the underlying social norms, cultural dynamics, and structural inequalities that shape the daily lives and interactions of refugee populations (Abdi 2006; Behera 2006). As illustrated by Bradly (2020) who analysed power for Just Associates, a feminist social movement, this form of power operates subtly and often unconsciously, shaping individuals' beliefs, behaviours, and perceptions in ways that perpetuate existing hierarchies. It therefore reinforces vulnerability of marginalized groups, such as refugees, to various forms of exploitation, including SEA. It does so by normalizing certain behaviours, perpetuating gender imbalances, and hindering refugees' ability to challenge entrenched systems of authority.

Refugees themselves are often in a closed space of power because they are excluded from the spaces where decisions that affect their lives are made (Arendt 2006; Griek 2009). However, some refugees are invited into the space of power in a limited fashion, putting them in a claimed space of power. As standard practice according to UNHCR’s refugee camp management handbook (UN Refugee Agency et al. 2015), a camp management committee is established as a platform to obtain the voice of refugee populations. These may also target sub-groups of refugees. For instance, CARE’s Vulnerable Women and Children programme discussed in the work of Horst (2006) developed a Women’s Representative Committee among female refugees to offer opportunities for refugees to give programmatic inputs.

Outside operational engagements, however refugees very rarely claim power by themselves (Crisp 2000; Napier-Moore 2005; Holzer 2013). Bender (2021) highlights a scenario involving female SEA refugee victims who were powerless to influence changes in the layout of refugee camps that placed them at risk, such as the absence of lighting near communal latrines. At refugee camps whereby perpetrators of SEA are the supposed 'protectors' of refugees, lack of accountability of aid workers and lack of power of refugees means they have no control over the conditions that govern their lives. Instead, these structures pose imminent dangers to them. Therefore, when those with any forms of power are not held accountable for using power responsibly, it facilitates an environment whereby SEA can flourish. Such misconduct goes unaddressed, leaving refugees without proper remedy and necessary support.

Synthesizing various types of power, collective power dynamics intertwine with the unique environment of camps, where confined spaces, limited resources, and dependence on external aid converge to create an environment conducive to spread of SEA. The empirical chapters that will follow (Chapters 4 – 6) will apply the power cube to analyse stakeholder engagement with refugee populations at the camps as well as using it to analyse the complaint mechanisms established within the camps. This will allow the thesis to dissect how power is reflected in the stakeholder interactions and complaint mechanisms. The next section examines how these skewed power dynamics have been shown by researchers to contribute to discouragement and under-reporting of safeguarding concerns and incidents, making an accurate picture of SEA extremely difficult to obtain.

2.7. Under-reporting of SEA cases

In environments where stakeholders with visible and invisible power exercise their power to hinder proactive participation, under-reporting of safeguarding concerns is increasingly recognised as a major challenge in tackling SEA in the aid sector. In the aftermath of the 2018 Oxfam SEA scandal, a proliferation of reports and assessments initiated by NGOs delved into the underlying factors contributing to this under-reporting trend and identified a range of formidable obstacles. These

endeavours collectively indicate an escalated level of emphasis accorded by practitioners (Humanitarian Accountability Report 2018 2020; Ground Truth Solutions 2021).

Safeguarding Resource and Support Hub's Global Evidence Review of SEAH in the Aid Sector, for instance, reveals multiple categories of barriers including structural factors (poverty and patriarchal norms among many others), organisational and community factors (2021). Oxfam's recent research (2020), which examines factors influencing sexual misconduct reporting conducted in Myanmar, Iraq, and Ghana, claim that organisational processes and systems play a crucial role in addressing reporting barriers. Studies conducted by NGOs and consultancy firms reveal empirical evidence of challenges of under-reporting from case studies– for example, Afghanistan (Ground Truth Solutions 2023), Sudan, Ethiopia, Kenya. and Syria (Islamic Relief Worldwide 2020a; 2020b).

A series of written submission to the International Development Committee Inquiry into SEA in the aid sector (from Oxfam GB, Red Cross and the UNHCR among many others) further validates and reinforces the prevailing concerns raised at the systematic level. Many NGOs have since undertaken revision of their complaint policies, incorporating mechanisms aimed at addressing the barriers (Islamic Relief Worldwide 2021; Danish Church Aid 2022; CAFOD 2023), indicating continuing attention from NGO communities to the concerns raised by the IDC inquiry and wider government and public scrutiny of NGO systems and practices.

Despite significant expansion of NGO-led literatures on barriers to reporting, academic scholarship remains limited. Smith (2017), who uncovered under-reporting of SEA cases in Timor-Leste, explored the institutional barriers in preventing SEA within the UN peacekeeping and criticises UN's lack of enforcement, claiming a significant lack of accountability of UN agencies in addressing SEA and the impunity of perpetrators. However, Smith's work primarily focuses on institutional shortcomings without fully addressing the cultural and systemic factors that perpetuate under-reporting within local contexts.

Davoren (2012), who conducted case study of international NGO namely GOAL in Haiti, examined the usage of complaint mechanisms with reference to the preceding standards – Sphere and HAP within the

urban context of internally displaced setting. While Davoren provides a valuable evaluation of complaint mechanisms, the study is limited by its narrow geographical focus and does not sufficiently address how these mechanisms function across different cultural and organizational settings.

Donnelley and Mazurana (2017), who explored sexual assault against aid workers, briefly covered key challenges that lesbian, gay, bisexual, and transgender (LGBT) aid workers face in reporting SEA concerns. They highlighted homophobia and anti-gay sentiment within the sector, contributing to abuse of LGBT aid workers. However, their study does not explore the abuse faced by LGBT individuals within the affected populations, missing a critical dimension of how intersecting vulnerabilities affect reporting and accountability.

Furthermore, long-standing accountability scholars such as Agyeman et al. (2009), Unerman and O'Dwyer (2010), and Hilhorst (2003; 2022) continue to emphasize lack of empirical evidence on the impact and effectiveness of accountability and complaint mechanisms in particular. Scholarly engagement on barriers to reporting, and more broadly on accountability with a specific focus on safeguarding, appears to be limited. This thesis seeks to contribute to scholarly debates on accountability interacting with safeguarding, which has started to be addressed by in emerging research by scholars such as Westendorf and Sandvik (2023) and Daoust and Dyvik (2020).

This thesis seeks to contribute to scholarly debates on accountability by addressing gaps identified in previous research. It aims to provide a more comprehensive analysis of the barriers to reporting SEA, considering both institutional and cultural factors. Additionally, this research will explore the interplay between accountability and safeguarding, particularly focusing on how these mechanisms function across diverse contexts and populations. By integrating perspectives from recent studies by Westendorf and Sandvik (2023) and Daoust and Dyvik (2020), this thesis will offer a nuanced understanding of accountability in humanitarian settings, challenging and complementing the existing body of scholarship.

2.8. Conclusion

In conclusion, this chapter has elucidated a comprehensive understanding of the dimensions of accountability and safeguarding within the context of refugee camps. Commencing with a broad examination of accountability, the chapter has navigated the intricate terrain of its conceptualization, stakeholders to whom aid workers are held accountable, the scope of their obligations, and the nature and range of complaint mechanisms. Moreover, the chapter has delved into the intricacies of downward accountability, particularly within the context of safeguarding whereby SEA is highlighted as a particularly acute violation of downward accountability.

The focus then narrowed down to the domain of refugee camps, identifying multilayered accountability systems comprised of pivotal stakeholders, namely the leading United Nations agency (UNHCR), the host state, NGOs, and the UN-led Inter-Agency Standing Committee on PSEA. The chapter then discussed the dynamics of power relations inherent in these accountability structures, using Gaventa's powercube, and applied this to consider some of the main barriers to reporting which have undermined PSEA in camps. Ultimately, this comprehensive review of scholarship not only contextualizes the research within the academic realms of accountability and safeguarding, but also situates it firmly within the specific context of refugee camps, thereby setting the stage for the subsequent investigative phases of this study.

Chapter 3. Methodology: Researching SEA without doing harm

3.1. Introduction

In this methodology chapter, a comprehensive exploration of the research framework employed to investigate accountability and safeguarding within the aid sector is provided, focusing on the interpretivist and qualitative methods that underlie the study of the CHS. The chapter outlines a two-staged research design, incorporating both theoretical analysis through 1) the 'What's the Problem Represented to be?' (WPR) approach for a critical discourse analysis of the CHS, and 2) an empirical investigation via a case study of refugee camps in Sudan to assess the practical effectiveness of complaint mechanisms. It highlights the adoption of relational interviewing to facilitate nuanced, ethical interactions with participants, and discusses the use of triangulation of data to enhance the study's robustness.

The chapter further discusses the researcher's positionality, power dynamics, and the importance of reflexivity in shaping the research process, and it highlights the ethical considerations pivotal in addressing the sensitive topic of SEA. Through this detailed exploration, the chapter aims to provide a transparent and rigorous account of the methodological approach, emphasizing the ethical and reflexive stance taken from the perspective of a critically engaged, practice-informed researcher.

3.2. Interpretivism and qualitative research

In order to investigate the intentions behind the Core Humanitarian Standard (CHS) and its practical implementation, I adopt an interpretivist approach in designing and carrying out my research. This methodology enables a comprehensive exploration of the CHS by focusing on the subjective and context-dependent aspects that profoundly influence its effectiveness. As O'Reilly (2012) aptly argues, interpretivists view humans as active participants in the social world, rather than mere objects in the natural world, emphasizing the need to understand human behaviour within the specific context of their society and culture (O'Reilly 2012: 34).

This approach resonates with my fundamental belief that individuals play a pivotal role in shaping society, leading to the existence of multiple, intersubjective social realities that the researcher interprets (Schwartz-Shea 2013: 12). As I discussed in Chapter 2, accountability is subject to diverse and context-specific interpretations. Hence, the interpretivist perspective aligns perfectly with my research objectives as it provides ample room for a thorough, nuanced, and holistic examination of this intricate subject matter.

My choice of an interpretivist approach naturally leads to a decision to conduct qualitative research. Qualitative approaches involve and reflect the underlying principles of the interpretive framework, which is rooted in the necessity to understand the significance of social behaviours within the context of the real world, as perceived by the individuals involved (de Gialdino 2009). This selection of methodology is motivated by the objective to extract insights from a particular contexts and individuals, to deepen understanding of social phenomena— in this case, sexual exploitation and abuse. The sensitive nature of this topic makes a qualitative approach especially appropriate for analysing the intricacies of social interactions, alongside examining matters of accountability and the failures in safeguarding mechanisms.

3.3. Overview of research design

Returning to my central research question – to what extent have complaint mechanisms helped affected populations to report complaints of sexual exploitation and abuse, the thesis seeks to answer the question by employing a two-fold approach, encompassing both theoretical and empirical perspectives.

The theoretical aspect involves examining the principles and concepts of accountability within the Core Humanitarian Standard of Quality and Accountability (CHS), a globally recognized self-regulatory standard within the humanitarian sector. Replacing the three major quality and accountability standards, CHS is distinctive in its structure, as it encompasses both a regulatory mechanism and a collaborative body. By combining these two complementary approaches - ensuring adherence to the standard (regulatory mechanism) and promoting continuous learning and improvement (collaborative approach)

- the CHS is designed to provide a comprehensive and effective set of guidelines for humanitarian organizations to follow, making the overall humanitarian response more accountable and effective, including to safeguard affected populations from potential exploitation and abuse.

The thesis research is organised in two stages as set out below. The first stage focuses on deconstructing the CHS to analyse its design, trace its origins, and reveal underlying problem representations. This encompasses a text analysis of the standard itself, conducted in conjunction with 34 interviews involving key stakeholders who contributed to the drafting of the standard in 2014. Furthermore, it involves a meticulous review of over 120 documents produced during the consultation process for designing the standard. The second stage of the research analyses the application of the CHS, exploring its effectiveness and examining the practical implementation, including the functioning of complaint mechanisms on the ground in refugee camps. This second stage involves interviews with 57 stakeholders. The breakdown of sources in each stage is summarised in the table below.

Table 2 Overview of research method

	Stage One: CHS in Theory	Stage Two: CHS in Practice
Approach	Critical discourse analysis of the standard – using 'What's the Problem Represented to be' approach	Case study of Um-Rakuba Camp and Tunaydba Camp in Gadaref state, East Sudan
Objectives	Answer the first sub-research question - To what extent does the CHS, in providing as sector-wide standard in accountability, maximize the opportunities for NGOs to respond to complaints of SEA?	Answer the second sub-research question - What role have complaint mechanisms played in enhancing downward accountability and preventing/tackling SEA?
	To analyse the way in which accountability is understood, framed and represented. To reveal hidden assumptions that were made by standard designers and silences behind the standard. This enables the research to examine if and how accountability has been framed in a manner that leads to decisive actions	To gain broad understanding of local context and challenges of SEA and examine the ways in which CHS and complaint mechanisms are implemented in the camp. To gain deeper understanding of refugees' experiences of living in the camp and on the use of complaint mechanisms set up by NGOs/coordination body.
Sources of data and primary methods	Text analysis of CHS standard 34 semi-structured interviews with stakeholders who contributed to drafting the standard in Consultation Process 2014 Review of 128 documents from the consultation process	57 semi-structured interviews: 31 with aid workers in Sudan 14 with refugees living in Um-Rakuba Camp and Tunaydba Camp in Gadaref state 12 with safeguarding consultants who have experience working in the context of displacement and/or Africa

As a whole, the thesis with its two-stage approach takes into account both the theoretical framework and practical application of the CHS in humanitarian operations to sheds light on the overall effectiveness and impact of the accountability mechanisms intended to safeguard affected populations from SEA. This approach enables the research to illuminate if and how accountability was framed/represented in order to bring about the required actions to prevent misconduct and behaviours that comprise or result in SEA. It also allows the thesis to examine if and how complaint mechanisms were developed and applied in a way that addresses accountability deficits failures and the under-reporting of SEA.

3.4. Stage One: The CHS and accountability in theory

In Stage 1 of the thesis, a critical discourse analysis approach known as the 'What's the Problem Represented to be?' (WPR) approach was employed. This method was developed by Carol Bacchi, a prominent critical policy analyst and is used to "facilitate critical interrogation of public policies" (Bletsas & Beasley 2012: 1). It begins with the fundamental assumption that the actions one intends to take in response to a situation reveal their perception of what needs to be changed or improved. Building on this notion, policies inherently incorporate underlying depictions of what is defined as the 'issue' or 'problem,' commonly referred to as 'problem representations.'

The primary objective of employing the WPR approach in this thesis is to examine how accountability is framed or depicted in language within the policy. Policies come in various forms, including official documents or statements produced by governments and institutions to address perceived issues, such as regulations, standards, or other measures designed to tackle these concerns (Bacchi 2002). In this thesis, the CHS, as an accountability standard, is regarded as a policy aimed at addressing an accountability deficit and combating exploitation and abuse.

The WPR approach distinguishes itself from traditional methodologies such as process tracing and other narrative and descriptive aspects of discourse analysis. Unlike these conventional approaches, the WPR method provides an innovative and systematic means of examining how policies actually construct

problems. It departs from the traditional perspective that policies primarily function as responses aimed at resolving social issues. Bacchi, in her work from 2011, asserts that the definition of problems within policies plays a critical role as a framing mechanism. This mechanism exerts influence over what aspects are deemed important and what is subsequently disregarded or, in some cases, deliberately silenced. In effect, policies themselves play a pivotal role in shaping the very 'problems' they purport to address.

The focus on problem representations played a pivotal role in addressing my research question. In the aid sector, there is a general awareness of the existing issues, but a distinct lack of understanding and tangible evidence on effective solutions to tackle and resolve these problems. The inquiry revolves around why SEAs persist in the aid sector and why NGOs encounter difficulties in handling such cases. This is the case even in the face of global commitments and substantial efforts to enhance accountability and complaint mechanisms across the aid sector (DFID 2019). This raises the critical consideration of whether current problem framing is conducive to taking effective actions. In other words, as highlighted by Bacchi (2009), the 'WPR' approach serves as a tool for ‘problem-questioning' within the policy itself, constituting a form of critical analysis, as opposed to simply aiming for straightforward ‘problem-solving' of the issue.

The WPR approach has been employed for a wide range of policy areas[6] , including drug addiction (Seear et al. 2014); disability mainstreaming and inclusive development (Marshall 2012); poverty (Angelique 2007); abortion (Alissar 2010); sex trafficking and prostitution (Carson & Edwards 2011); and infant mortality (Shapiro 1992). For example, Walker (1990) applied the WPR approach to analyse how the Canadian Conservative Party framed domestic violence in its national policy. Initially, it was seen as a public safety issue, directing resources to the police to protect female victims. However, WPR

[6] Examples of WPR approaches include Bletsas Angelique 'Contesting Representations of Poverty: Ethics and Evaluation' (2007) 26 (3) Policy and Society 63; Lisa Carson & Kathy Edwards (2011) Prostitution and Sex Trafficking: What are the Problems Represented to Be? A Discursive Analysis of Law and Policy in Sweden and Victoria, Australia, Australian Feminist Law Journal, 34:1, 63-87. Patterson Stephanie ‘What’s the Problem With Gender-based Analysis? Gender Mainstreaming Policy and Practice in Canada’ (2010) 53 (3) Canadian Public Administration 395; Marshall, Nina 2012. ‘Digging deeper: the challenge of problematising “inclusive development” and “disability mainstreaming”’, in A. Bletsas and C. Beasley (eds) Engaging with Carol Bacchi: Strategic Interventions and Exchanges. Adelaide, University of Adelaide Press. pp. 53-70. Seear, Kate and Fraser, Suzanne 2014. ‘The addict as victim: Producing the “problem” of addiction in Australian victims of crime compensation laws’, International Journal of Drug Policy 25: 826-835.

analysis revealed that this problematisation had silenced the need for women to enhance their self-confidence and sense of control. This critique led to a resource shift from the police to women's shelters, promoting mutual support among women and confidence building, indicating how a change in the way that the problem of domestic violence was framed in the policy led to a change of understanding and approaches to addressing it.

In similar manner, this constructivist approach facilitates exploration of how issues of accountability and safeguarding are framed and represented in the standard of CHS. It allows critical analysis on the root causes of accountability challenges, including consistent reluctance of survivors of SEA to report and a lack of awareness of complaint mechanisms among affected populations. Additionally, it uncovers what practices were considered status quo and unchallengeable at the time of consultation (Stephanie 2010). As will be shown in the following chapter, adopting this approach has exposed areas of silence, in other words what was regarded as non-important and thus was not explicitly addressed in the text of the standard.

3.4.1. Applying the 'What's the Problem Represented to be?' approach

In applying WPR approach, Bacchi (2009) recommends 'working backwards' from concrete policies, in my case the CHS, to reveal what is represented to be the 'problem' within them. This is done by going through a set of six guiding questions below.

1. What's the 'problem' represented to be in a specific policy?
2. What assumptions underpin this representation of the 'problem'?
3. How has this representation of the 'problem' come about?
4. What is left unproblematic in this problem representation? Where are the silences? Can the 'problem' be thought about differently?
5. What effects are produced by this representation of the 'problem'?
6. How/where has this representation of the 'problem' been produced, disseminated, or defended? How has it been (or could it be) questioned, disrupted or replaced?

Bacchi suggests that we apply as many or few of these as relevant in any particular case. These guiding questions aim to examine areas which are often unexplored– "how a policy offers a representation of the problem to be addressed, how these representations contain assumptions which often go unanalysed,

and how these representations shape an issue in ways which limit possibilities for change" (2009: 12). Following this section, I will move on to specific data collection tools and explain how I approached and carried out semi-structured interviews.

3.4.2. WPR Guiding Questions

Question 1 - What's the 'problem' represented to be in a specific policy?

Question 1 helps with clarifying implicit problem representation within the CHS. To do this, I began by reviewing the text of the CHS and publicly available secondary resources to gain insights on the design and consultation process of the CHS in 2014. This exercise laid groundwork for my understanding and explanation of how the CHS was designed. Notably, the online documents proved to be scarce, with a marked dearth in the depth of discussion regarding the process. Additionally, numerous hyperlinks in pivotal documents were broken, leading to inaccessible original documents[7]. To address these gaps, in parallel I conducted semi-structured interviews with key stakeholders who played a critical role in drafting the standard and driving the consultation process. Insights derived from Question 1 contributed to further understanding of how stakeholders perceive 'problems' of accountability.

Question 2 - What assumptions underpin this representation of the 'problem'?

Question 2 assists with uncovering assumptions that underpin how accountability is conceptualised as a 'problem' (Bacchi 2009). In order to reveal these assumptions, semi-structured interviews were conducted to explore 'local theory' (Whyte 1984) – how stakeholders make sense of accountability and how their perception of accountability has affected content of discussions in drafting the standard. The semi-structured interview method was particularly valuable in this context to extract soft element of data and a sense of the process which is not often evidenced in the documents (Grix 2004). As per the interview guidance and a list of interview questions (Annex), I conducted the interviews in a fairly flexible and exploratory manner with appropriately 10 prompt words listed in my interview notes such

[7] Examples include Core Humanitarian Standard (2014a-u). Since the CHS Revision Process has commenced in May 2022, all web pages and resources related to the original consultation process in 2014 disappeared. A new webpage called CHS Revision is created and is populated with new materials as Revision Process proceeds.

as accountability, safeguarding, power, and gender. Given that the consultation process took place more than eight years ago in 2014, I gave a brief overview of the process to remind them of and confirm their involvement before commencing with interview questions. Starting each interview with broad questions around the participants' background in accountability and their specific engagements during CHS Consultation Process in 2014 was helpful in steering discussions towards topics the participants were interested in, concerned about, and/or recalled the most. This approach not only revealed valuable insights but also allowed the participants to prioritize topics according to their significance.

In order to specifically uncover hidden assumptions that lie behind the standard, I asked questions such as what topics were prioritised during the consultation process, how they were prioritised, which areas were discarded, who decided which topics to de-prioritise, why safeguarding was not discussed more explicitly, who decided to silence safeguarding commitments, and so forth (Annex x: Interview Questions). Depending on their various roles and involvement in the process, I prepared a different set of questions as per their involvements in technical advice or actual write up of the standard. The participants encompassed a wide range of stakeholders with differing involvement, and the data therefore included a range of experiences and perspectives. I also took key issues and emerging findings from the interviews and grouped them by theme, as well as colour-coding within this by the category. This thematic grouping facilitated a deeper understanding of stakeholders' perceptions, experiences, and reflections on the evolution of accountability standards.

As part of the interview process, some participants shared confidential documentations along with their extensive insights. A total of 172 documents including reports, meetings minutes, presentation slides, and photos were shared or otherwise made accessible, giving detailed insights into content of discussions that took place while drafting the standard. Additionally, a YouTube video of the CHS Launch Event held in Copenhagen in January 2015 (Core Humanitarian Standard 2014) helped to build a fuller picture of the consultation process, including who were present, content of presentations, and room settings that influenced dynamics of discussions.

In order to understand how framing of the problem has shifted over the years, the terminology of accountability and safeguarding was reviewed within the CHS as well as its preceding standard - the Humanitarian Accountability Partnership (HAP) Guidelines published in 2004 and 2010. I developed a list of terminologies that have influenced how accountability was framed – including beneficiaries, communities and people affected by crisis, rightsholders; safeguarding and prevention of sexual exploitation and abuse. The terminologies were then compared across the standards to demonstrate evolution of problem representation of accountability. This comparative analysis across the different standards illuminated the shift of problem representation of accountability.

Question 3 - How has this representation of the 'problem' come about?

Question 3 seeks to examine how this understanding of the 'problem' has emerged (Bletsas & Beasley 2012). As such, once the document review had provided sufficient insights into how accountability was conceptualised as a problem within the CHS, I then moved on to investigate how these representations came about. The interviews with the stakeholders who participated in the CHS Consultation Process to draft the standard provided critical data on this process. Semi-structured interviews were again considered most appropriate to obtain soft data that does not get addressed on official documentation. It helps to explore and identify hidden assumptions and presuppositions that lie behind the standard. As they introduced themselves and their involvement in accountability work at the beginning of the interviews, the conversations naturally led to why they became interested in working in the area of accountability. I then prompted follow-up questions on their observations on the challenges of accountability within the sector, and this has opened up insightful exploration on how they viewed accountability deficits and how accountability has been conceptualised/framed.

Question 4 - What is left unproblematic in this problem representation? Where are the silences? Can the 'problem' be thought about differently?

Question 4 requires careful scrutiny of possible limitations in this representation of the 'problem' (Bletsas & Beasley 2012) and aims to expose what may have been left out of this process – what has not been explicitly stated in the CHS. This question creates a rare opportunity to allow critical analysis on what fundamental assumptions aid workers are taking for granted which need revisiting. In order to

enhance accountability to affected populations, what are we not looking that requires more attention? For instance, CHS Commitment 5 states "Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints" (Core Humanitarian Standard). This stated commitment implies that there is lack of this presumable desirable condition (i.e. lack of access to mechanisms; presence of mechanisms that are not safe and not responsive) and reveals underlying assumptions about what is problematic in the eyes of stakeholders who developed the standard.

Specific indicators within Commitment 5 can also be analysed to reveal underlying assumptions about what is problematic. Indicator 5.1 states that organisations will "consult with communities and people affected by crisis on the design, implementation and monitoring of complaints-handling processes" (Core Humanitarian Standard). The language here implies that communities are not always or routinely being consulted throughout these processes. But are we assuming that people affected by crisis will come forward if complaint handling processes are designed with more opportunities for consultation? How do we know that they will want to proactively report? What if people affected by crisis will never want to open up and share their concerns to NGOs, not least due to the deep-rooted power imbalance between them and aid workers, no matter what systems are put in place? Are we asking the right question? What mechanism are we putting in place to address the power dynamics and silent approval of misconducts? The WPR approach allows such critical scrutiny of how these problem representations influence the ways in which the CHS frames accountability and its effectiveness.

3.4.3. Semi-structured interviews

In order to capture data that would help answer the guiding questions, I conducted total of 34 semi-structured interviews for the first stage. The initial interviews with the two key stakeholders from my professional network (Pierre Hauselmann, the former Executive Director of HQAI, A1 and Aninia Nadig, the former Head of Policy and Practice at Sphere Association; Interview with A14) offered an overview and insights into the consultation process. They were selected as the first two to approach due to their long-standing engagements in accountability and standard setting since early 2000 and the fact they are still heavily engaged in the present. Through snowball sampling process, I then conducted 34

remote interviews from February to July 2021– all of these interviewees had participated in the CHS Consultation Process in 2014. The stakeholders were selected based on their membership of at least one of four categories: 1) stakeholders who participated in the CHS Consultation Process in 2014; 2) panellists who reflected on progress since the launch of CHS at the flagship annual CHS Exchange Event 2019; 3) those who led on development of CHS Alliance PSEA Handbook (2020); and 4) those spearheading the accountability standard setting initiatives and who have historically contributed directly to creation of the CHS. The locations of the participants varied - 27 participants from Global North (9 in Switzerland, 10 in UK, 4 in Australia, 2 in Denmark, 1 in France, 1 in USA) and 7 participants from Global South (2 in Bangladesh, 2 in Kenya, 1 in Ethiopia, 1 in Lebanon, and 1 in Syria).

The use of my existing professional network helped significantly in arranging and conducting interviews. My experience as a practitioner as well as knowledge of the current trends on accountability almost instantly helped create common ground and build rapport with the participants at the beginning of the interviews. Despite having no previous contact/engagements with the participants, having spoken with key actors in this field and been referred by the top leading practitioners also helped build credibility of my research among the participants and beyond. This chimes with Salmons' experience of remote interviewing:

In an online interview situation, particularly where the participants were recruited online and are unknown to the researcher in any face-to-face context, the researcher's insider role and his/her understanding gained from personal experience with the research phenomenon could make it easier to discuss issues . Illustrating this, one participant started the interview with a comment "I've kept hearing about this PhD student in Birmingham who is doing very important research so I'm glad to be in touch with you" (Interview with A31).

The participants were incredibly supportive of my research, and many offered me a long list of names when asked for further referral at the end of the interview. After 34 interviews, I reached what scholars including Grady (1998) and Sandelowski (2008) describe as 'data saturation.' Specifically, I started to

hear the same comments over and over, achieving what Sandelowski (2008: 875) calls 'informational redundancy'. For this reason, having covered two-thirds of the list of potential interviewees I ended this phase of data collection. Among the 34 key informants, I conducted subsequent interviews or exchanged follow-up email correspondence with those I believed would offer more in-depth insights on new topics that emerged during the data collection phase in order to reflect emerging avenues of inquiry such as aid decolonisation.

The vast majority - 32 out of 34 - interviews[8] at this stage were conducted using Zoom, a video-calling platform equipped with audio transcription function. Transcription was auto generated after the interviews and was checked for accuracy by comparing with my interview notes. The two interviews were conducted on Skype as per indicated as preference by the participants. Additionally, I took interview notes using touch typing to maintain eye contact and utilised the mute function to minimize the sound of typing to reduce possible distraction for the participants. Drawing on my professional experience conducting interviews online, including with aid workers, I relied on my own approach to interview notetaking. This involves manual typing on Microsoft Word with notes structured based on the emergent themes and the guiding questions as per my interview guidance note. This approach enables flexible data collection and analysis by developing and applying codes, categories and themes that are relevant and meaningful to my research questions as data collection progressed.

During the three months of data collection, time for personal reflection was allocated every Friday. This routine proved to be useful not only to absorb and organise the incoming data but also to reflect on my positionality. More importantly, as I discuss in the positionality section later in this chapter, this space became the point of constant reminder to challenge my bias and assumptions as I have already established knowledge on accountability deficits from my past experiences as a practitioner. In fact, emerging avenues of inquiry arose from this reflection period on Friday mornings as I asked myself why the interviews unfolded in a way that they did, why did my participants look distressed when we talked about particular issues, what were they not saying, what would I have said if I were in their shoes

[8] For the remaining two participants, one preferred to use Skype on Business and another on Teams. I respected their preferences and had them create the connection link as they wished.

as a participant wearing a hat of practitioner? Following the interviews, I allocated extra time and space to reflect on emerging trends and themes that popped up during the interviews and considered how new data could contribute to asking more in-depth questions in the upcoming interviews to enrich the quality of data and address gaps.

3.5. Stage Two: Case study – the CHS and accountability in practice

3.5.1. Rationale for case selection

Why use a case study?

In his introduction, Yin (2015) argues that "the distinctive need for case study research arises out of the desire to understand complex social contemporary phenomena…as it allows investigators to focus on a 'case' and retain a holistic and real-world perspective" (2015: 4). The second part of my thesis aims to unpack reality of how affected populations engage with aid workers in everyday life and navigate through the patchwork of accountability mechanisms at times of misconduct by aid providers.

With a view to study complaint mechanisms, as one of the accountability mechanisms included within the CHS framework to encourage more reporting of cases of sexual exploitation and abuse (SEA), I chose to employ the case study method as it enables me to gain better understanding of contextual factors that affect individual behaviours. This is particularly important for my research as I endeavour to examine the application of complaint mechanisms guided by CHS in one specific context in one country. In this section, I outline three reasons why I selected refugee camps in Sudan as my desired context to study.

Why refugee camps?

Firstly, as I undertook research, it was crucial for me to examine the application of accountability mechanisms guided by CHS in a context where there is evidence of significant occurrence of SEA. Extensive review of the literature on SEA drivers and vulnerabilities highlighted that refugee contexts are consistently reported to display the highest incidence of SEA among populations receiving aid

(Davey et al. 2010; Bramucci et al. 2015; Mazurana and Van Leuven 2016; Feather et al. 2021). While other contexts such as those characterised by general development assistance, natural disaster, and armed conflict were considered, the unique characteristics of the fragile environment within refugee camps exemplify conditions conducive to the proliferation of SEA. This is demonstrated well by Feather et al. (2021) who conducted a global evidence review of SEA in the aid sector. Their research argued that the strikingly increased risks of SEA in this particular context are due in large part to disruption of livelihoods.

The elevated risk of SEA connected to refugee camps is well-documented in research showing the increased vulnerabilities to and threats of sexual violence, especially when refugees venture outside the camps in search of basic necessities. The inadequacy of facilities that fail to cater to the needs of vulnerable groups has been extensively studied (Aubone and Hernandez 2013; Al Akash & Boswall 2016; Goodman & Mahmood 2019). I ruled out natural disaster and armed conflict contexts due to the challenging operational environments, a decision informed by my direct experience managing humanitarian responses. As an aid worker who has overseen emergency responses and hosted PhD students at the country office, I considered it inappropriate to place myself in a situation that could potentially burden humanitarian teams during intense response periods.

Further justifying the decision to focus on refugee camps, my literature review highlighted the dearth of empirical studies on accountability the in specific context of refugee camps (Hilhurst et.al. 2021; Martin et.al. 2021) while abundant attention has been given to accountability in more general development assistance settings and programmes (Walsh 2014). My thesis thus aims to fill this gap by bringing together contributions from leading scholars and practitioners in accountability, safeguarding, and refugee studies, to specifically examine accountability to prevent and tackle SEA in refugee camps.

Why Sudan?

Next, I outline the reasons why I chose Sudan. Firstly, due to its focus on the role that Inter-Agency Standing Committee (IASC) on PSEA plays in improving accountability and complaint mechanisms, it was critical to choose a country with presence of Inter-Agency Standing Committee (IASC) PSEA

Network. IASC (2021) indicates in its note on the status and practice of IASC coordination at national levels that Sudan is one of the three countries with largest dedicated capacity on PSEA. Its Global Dashboard also indicates steady progress on PSEA activities, including increase in the estimated percentage of affected populations who can access safe and accessible complaint channels. Therefore, by focusing on Sudan where the in-country IASC PSEA Network is actively promoting work of PSEA, this research takes the opportunity to deepen empirical knowledge of the network.

Secondly, while there are countries other than Sudan where IASC PSEA Network is present, including Jordan and Bangladesh where such research would be arguably of equal use, across multiple studies[9] by practitioners Sudan is identified as having good practices of accountability and complaint mechanisms. Danish Refugee Council for example includes its best practice from Sudan in its Global Community Feedback Mechanism Guidance and Toolkit (2022), while CHS Alliance picks an example from Sudan for its PSEAH Implementation Quick Reference Handbook on the management of accountability mechanisms (2020). Consultant-led thinktank guidelines, such as BOND's Toolkit for developing an organisation-wide safeguarding report handling mechanism (2018), also incorporate example of best practice of complaint mechanisms being adapted within the context in Sudan. Therefore, given the consistent recognition of the country's commendable accountability and complaint mechanisms in various NGO reports and practitioner studies, it is valuable to select Sudan as a case of best practice to extract valuable insights that the sector can benefit from.

Lastly, in selecting the country, implications of the Covid-19 pandemic needed to be taken into consideration. Firstly, my feasibility assessment considered Covid-related factors and risks including the country-level movement restrictions, logistical challenges in country, the security advice of the UK Foreign Commonwealth & Development Office (FCDO), and risks of travelling for myself, potential interpreter, and interviewees. This assessment also took account of possible impacts stemming from

[9] Danish Refugee Council. (2022). Global Community Feedback Mechanism Guidance and Toolkit; CHS Alliance (2020). PSEAH Implementation Quick Reference Handbook; Protexion (2018).Toolkit for developing an organisation-wide safeguarding report handling mechanism; UNICEF, USAID, UNFPA (2017). Inter-Agency Gender-Based Violence Case Management Guidelines; IASC PSEA Task Team (2016). Inter-agency cooperation in community-based complaint mechanisms: Global Standard Operating Procedure; Oxfam (2008) The Guide to the HAP Standard.

differential access to vaccines on risks and power dynamics between participants and myself. It led me to conclude that in-person fieldwork was not feasible on both practical and ethical grounds and this was confirmed by my university ethical review committee. Secondly, the decision to conduct remote fieldwork followed a thorough risk assessment. The risk assessment explored i) Covid adaptations and current working style of NGO staff, ii) the current situation of NGOs' programme implementation, iii) remote approach of communication with communities, and iv) language spoken by staff and communities. The exercise shaped my revised selection criteria for identifying a country for my case study, while also considering the extent and value of my existing professional networks in overcoming some of the practical barriers.

Why Um Rakuba Camp and Tunaydbah Settlement?

Finally, I explain the reason why I selected Um Rakuba Refugee Camp and Tunaydbah Refugee Camp in Sudan. As the two biggest Ethiopian refugee camps in East Sudan, these two camps were selected as they represent contemporary challenges that are affected by ongoing, live crisis - Ethiopian civil war and Sudanese political crisis, exacerbated by the impacts of the Covid pandemic. Markedly, among Sudan's refugee camps, these two were specifically highlighted by the media and UN updates such as The New Humanitarian, Relief Web, Devex, and UNHCR's Ethiopia Emergency Situation Profile. These sources provided live insights into the emerging challenges as the Ethiopian refugee crisis unfolded in 2021. These camps, witnessing a continuous influx of new arrivals since December 2020, stood out in providing a unique perspective on the unfolding challenges of the Ethiopian refugee crisis in 2021.

The risks of SEA, violence, and trafficking at the camps have been starkly illuminated by an independent non-profit news organization, The New Humanitarian, through its investigative report titled "EXCLUSIVE: Donors accuse UN of mismanaging Tigray refugee response. 'Lives may be lost.'"

> *"Addressed to the UN's refugee agency, UNHCR, the three-page letter dated 17 June accuses the organisation of a lack of leadership and failing to act on prior donor warnings about gaps and delays in providing aid at the camps… The alleged lack of services has left*

camp residents at risk of trafficking, armed recruitment, and sexual violence, according to the letter, which describes the situation as at a stage where the safety, security and dignity of refugees is at severe risk, and lives may be lost" (Kleinfeld 2021).

The letter articulates a dire narrative, positing the camp residents' vulnerability to trafficking, armed recruitment, and sexual violence as a consequence of the alleged lack of accountability. This letter with the stamp of two signatory governments illuminates the urgent need for in-depth inquiry into the newly established camps (December 2020). At the time of data collection in 2022, this location has received scarce attention for academic research.

To date, only two scholarly works have been published concerning Um Rakuba and Tunaydba camps, concentrating on climate change (Ahmed et al 2021) and health (Hassan & Nellums 2021) respectively, leaving a significant gap in the literature regarding accountability and safeguarding practices within these refugee communities.

3.5.2. Conducting interviews with vulnerable participants

Having outlined my rationales for choosing a case study approach and the specific locations for the case study, the following section details how I conducted interviews with two categories of key informants using i) remote and relational interviews, ii) document review, and iii) media monitoring from March to July 2022.

Remote interviews took place with two categories of stakeholders as below:

Table 3 The categories of the interviewees

Category One: International and national NGOs, and UNs	
Target participants Aid workers in Khartoum Aid workers in Gedaref	Objectives: - To gain broad understanding of local context of SEA and capture a snapshot of the scale of SEA in the camp. To examine the ways in which complaint mechanisms are designed and implemented at the community level in the camp. - To explore the extent to which the CHS maximizes opportunities to respond to complaints of SEA - To examine the extent to which NGOs and UNs coordinate on inter-agency complaint mechanisms and SEA.

Category 2: Refugee communities in the camp	
Target participants **2.1:** Refugees who are proficient in English **2.2:** Refugees who speak their local languages with support from an interpreter	Objective: - To capture their experiences of living in the camp and on the use of complaint mechanisms set up by NGOs/coordination body, as well as the wider perceptions of communities on SEA issues within and around the camps.

Interviews with aid workers in Sudan

Due to the sensitivity of the topic, establishing a foundation of trust with participants prior to and during interviews was imperative. The sensitive research topic presented anticipated challenges in encouraging participants to openly discuss issues within the field. Conducted amid a backdrop of safeguarding scandals (See Chapter 2 section 2.4), some organizations were cautious, and notably, some participants exhibited suspicion regarding the purpose of my sensitive research. Some interviewees raised inquiries about the research's commissioning, the target audience, and the intended use of the findings. Several participants sought clarification on whether they could express personal views, expressing the need for authorization from their head office in Khartoum if they were representing their organizations. Two individuals sought permission from their organisations to participate in the interviews, and one obtained approved from his organisation while the other was denied to participate. This hesitancy was evident not only in their verbal conversations with me but also in their written communication. However, this was all understandable, and I cautiously and delicately managed the trust building process. Once these concerns were addressed and the purpose and use of the data was clarified, many participants, initially reluctant, emerged as some of the most candid contributors, openly sharing their insights, including highly sensitive information.

The aid workers were requested to describe their organization's accountability and complaint mechanisms, providing insights into the aspects they deemed effective or ineffective. As they shared personal reflections and challenges, the interviews naturally shifted towards sectoral challenges related to exploitation and abuse, with a subsequent in-depth exploration of SEA as deemed relevant.

Additionally, participants were asked about their familiarity with the CHS and their awareness of the initiatives undertaken by the Inter-Agency Standing Committee on PSEA.

Interviews with refugees

Due to the Covid pandemic, the field location needed to have reliable internet connectivity. This criterion needed to be top priority in order to ensure remote access to my potential participants due to constantly changing Covid-19 restrictions in the United Kingdom as well as the country of my case study. At the initial stage of planning, in coordination with Islamic Relief Sudan with whom I established a research partnership agreement, I held multiple test calls to assess internet connectivity from my desk in the UK to the head office in Khartoum, the field office in Gedaref, as well as the base locations in Um Rakuba Camp and Tunaydbah Settlement.

Skype was identified as the most frequently used platform among aid workers in Sudan thus I adapted to use skype instead of WhatsApp. The test calls revealed unstable internet connectivity at the camps, thus alternative ways were explored. As I sought diverse methods for arranging the interviews, I found various direct communication channels to engage with my key informants. Initially, the Wi-Fi café situated in Tunaydbah Settlement served as a network access point for connecting with refugees. However, privacy posed a challenge in this setting. Secondly, a Wi-Fi tower positioned at the edge of Um Rakuba Camp provided connectivity, albeit with limitations. Lastly, the internet café in the adjacent town offered a stable and reliable connection for communication.

I began each interview by asking the interviewees fairly open questions about their general experience living in the camps. Many shared their journeys to the camps, how they are finding their lives, and the support they receive from the NGOs. While the interviews were guided by my interview guidance note with pre-fixed questions, as soon as I detected clues from their language and facial expression to dig deeper in certain topics from interviewees, I did not hesitate to ask further questions which then brought up more in-depth reflections.

Upon reflections, there were two categories of refugee populations I have interviewed – firstly, those who are in their 20-30s and are proficient in English; and secondly, those who are older with caring

responsibilities and who are not proficient in English. Informed by my direct experiences of conducting remote interviews with refugees in Lebanon from my recent consultancy work[10], I took different approaches to build rapport and conduct interviews.

With the refugees who are proficient in English, I was introduced via WhatsApp through snowballing sampling among refugee populations. As I made initial contact with them on WhatsApp messages, I introduced myself and explained briefly my research and the reasons why I wanted to speak to them. Thus, by the time we held online video WhatsApp calls, the participants were informed of my intention and objectives. I had also managed to build rapport online prior to the interviews, asking them to introduce themselves. Once remote interviews commenced, I repeated introducing my research and sought consent as per my ethics form. Over three weeks, I was able to hold multiple conversations with them, each lasting about thirty minutes and some twice or three times. They were able to call me at their convenient time, towards the end of their day or at the beginning of the day when internet connectivity appeared to stay stable. Over the course of my engagements, the refugee communities in the camp suffered from the impact of flood and unexpected fire within the camps during which they shared their challenges in obtaining basic needs of food and temporary shelters from aid agencies (Image on the right). As I acted as their listening ear, I obtained sufficient trust that they shared more sensitive experiences and concerns with me towards the end of data collection.

Figure 5 Image of Um Rakuba camp flooded, photo taken by a refugee participant (C9)

[10] My consultancy works offered timely insights on approaches to remote interviews during Covid pandemic. The audit consultancy assignment I undertook just before my PhD data collection started in 2022 involved online interviews with aid workers at the headquarters, country, and field levels as well as remote interviews with community members in Colombia, Iraq, and Sudan. This experience heavily influenced my data collection methodology and the decision to seek one-to-one remote interviews. I initially planned to conduct online focus group discussions following advice from IR Sudan. This reflected a concern that my participants would not feel comfortable talking one to one without any interactions with me beforehand. However, my consultancy experiences demonstrated that there were a number of challenges on ethics, logistics, and quality of data that came up when using online focus group discussions. Coupled with Covid considerations, it was deemed more appropriate to conduct one-to-one remote interviews with refugees than to bring groups of people together for purposes of my interviews.

With refugee interviewees who are either no proficient in English or have no access to mobile phones, a local interpreter was employed to help facilitate translation of my interviews between English and the local language of Ethiopian refugees, Tigrinya. In selecting interpreters, it is important to consider their background, gender, age, and social class as these factors can significantly influence the dynamics of interviews, particularly willingness of participants to engage in open and honest conversations (Shimpuku & Norr 2011; Miller-Cleary 2013; MacKenzie 2016). Given that the data collection period coincided with the Ethiopian civil war and the Sudanese political crisis, characterized by protests and road closures across the country, individuals identified with support from my safeguarding network were unable to travel to the refugee camps in East Sudan. This limitation highlights the challenges imposed by external events on the practical aspects of the research process.

Instead, leveraging my professional connections with NGO practitioners based in the UK, I identified a male refugee employed by an international NGO working within the refugee camps of my case study. Despite my initial preference for an interpreter who was both female and experienced in accountability and safeguarding, I encountered challenges in finding an individual with these specific qualifications within the geographical scope of the case study. To mitigate this constraint, I conducted regular meetings to establish rapport and familiarity and organized several online training sessions with the selected interpreter in advance of the data collection phase. Additionally, I facilitated a simulated interview whereby the interpreter assumed the role of an interviewee, enhancing his comprehension of the interviewee's perspective and the likely questions I would pose during the actual interviews.

This exercise served a dual purpose, allowing me to gain insights into the local context of safeguarding from the interpreter while offering the interpreter a practical understanding of the interview process. Through these engagements, a strong working relationship was established. Subsequent regular communication throughout the research period enabled the interpreter to develop a thorough understanding of my research objectives and methodologies, ensuring his effective support in accordance with the parameters I had established.

Employing a local interpreter from the community being studied presents several advantages and disadvantages. On the positive side, a local interpreter brings cultural competence to the research, possessing an intimate understanding of the community's cultural intricacies. This familiarity enhances the accuracy and cultural sensitivity of translations, ensuring that the researcher gains nuanced insights that might be challenging to capture through an outsider's lens (Temple & Edwards 2002). Moreover, having a local interpreter can contribute to building trust and rapport with research participants, as the shared cultural background establishes a sense of familiarity, potentially encouraging participants to share more openly and honestly. Furthermore, a local interpreter may adeptly navigate ethical challenges inherent in qualitative research, leveraging their understanding of local norms and customs to ensure that the research process respects the ethical considerations of the community (Ritchie et.al. 2014).

Conversely, drawbacks accompany the use of a local interpreter in qualitative research. One notable concern is the risk of introducing bias into the interpretation of data. The interpreter, being part of the community being studied, may inadvertently convey their own perspectives, beliefs, or experiences, leading to a subjective representation of participants' responses. This subjectivity can compromise the validity and objectivity of the research findings, hindering my ability to accurately capture the diversity of perspectives within the community. More importantly, participants may find it uncomfortable to disclose sensitive information and concerns. Participants may weigh the potential benefits of sharing information against concerns about privacy, judgment, or the unintended consequences of disclosure. Therefore, the decision to employ a local interpreter has involved a careful balancing act between the advantages and drawbacks inherent in such a choice. While a local interpreter brings invaluable cultural competence, fosters trust, and navigates ethical challenges with insight, the potential for introducing bias and hindering participant disclosure poses significant considerations.

3.5.3. The relational interviewing approach

Throughout data collection phase, relational interviewing approach was employed. In the introduction to her book on this approach, Lee Ann Fujii (2018) explains that relational interviewing allows

researchers to generate data through their interactions with interviewees based on ethical treatment of all participants. Due to the sensitivity of the research topic, I selected this approach to help me to develop an ethical sensibility to minimize harm to the participants. Relational interviewing emphasizes the significance of the researcher's capacity to effectively evaluate data when reflecting on the collaborative interactions occurring during a conversation. These interactions encompass various elements such as silent moments, instances of counter-questioning, sudden declines to discuss certain topics followed by subsequent discussion, and the potential influence on participants resulting from the manner in which questions are posed and the tone of communication (Fujii 2018). Understanding the limitations of remote interviews (as outlined above), it was crucial to detect even minor clues on the messages the participants were trying to send.

Relational interviewing offers no restrictions on time duration, quality, and characteristics of interviews – long or short, one-time or repeated, positive or negative, casual or formal, at different points in time as the research progresses. Its focus lies on interactions rooted in specific context established by the two parties of interviewer and interviewees. This factor was particularly relevant for my remote interview considering the challenges imposed by Covid pandemic. Therefore, this approach was more appropriate than others including ethnographic interviewing where researchers are expected to stay engaged with interviewees over a sustained period of time.

Relational interviewing approach also embraces mistakes as gifts. For instance, during one of the first few interviews which I conducted with my interpreter, I gained deeper insights from the mistakes that were made which I would not have otherwise. Due to poor internet connectivity at the camp in the early part of the data collection, my interpreter brought a mother with her youngest son to the corner of the camp where Wi-Fi tower is located. This location was remote from tents, with limited movement of people. As we started our interview on Skype and WhatsApp video call, I detected uneasiness from the participant’s face while I could also hear the voice of her son trying to get her attention as she spoke to my interpreter and myself.

Despite my briefing meeting with the interpreter prior to the interviews reiterating what to do and what not to do to ensure smooth conduct of interviews and do no harm to the participants, this particular interview was, in my view, a failed interaction. However, I reflected on what this failed interaction reveals, and both took lessons learnt as we reflected on our ethics, risk consideration, and discussed the concepts of do no harm. My interpreter also shared his insights from the perspective of refugees. Frequent WhatsApp calls and videos took place with the interpreter to ensure our intentions and purposes were aligned. From this experience, I learnt to turn moments of regret into gifts of valuable insights and to alter my approach according to this learning.

3.5.4. Building an argument with diverse data

Triangulation emerged as a critical approach in enhancing the credibility and validity of my research, particularly in light of the challenges posed by the Covid-19 pandemic, which restricted my physical access to the field. The strength of a case study lies in flexibility to obtain data from multiple sources over multiple points in time, which helps to build a more complete picture of underlying mechanisms and their interaction with the local context (Yin 2014; Gerring 2007; Smith & Elger 2014; Wynn & Williams 2020). As Noble and Heale (2019) claim, triangulation involves the use of multiple sources and methods to strengthen the reliability of research findings. In my study, triangulation took various forms, incorporating document analysis, semi-structured interviews, and media review. This multifaceted approach not only compensated for the limitations imposed by the pandemic but also enriched my understanding by providing diverse perspectives. For instance, some participants presented a positive image of accountability practices in refugee camps, prompting me to exercise caution due to the potential unreliability of such portrayals. I addressed this by triangulating the information with data from earlier interviews and drawing on my broader knowledge of refugee camps. Dean (2017) indicated the tendency of interviewees to present favourable perspectives, driven by concerns about reputational damage, especially in discussions about sensitive topics like SEA.

The reliance on secondary resources due to restricted physical access to the field was a notable aspect of my research. Due to high media to the Ethiopian refugee crisis on media, publicly available secondary

sources on the internet included news, press, blogs, and social media offering live data during the course of research. Abundant online resources particularly on ReliefWeb, the New Humanitarian, DevEx, and X (former Twitter)[11] helped to shape my knowledge of the local situation throughout the research period. This continuous access to real-time data complemented the triangulation process, ensuring the inclusion of up-to-date information in my analysis.

Furthermore, given the sensitive nature of the topic, establishing trust with participants and gaining access to confidential documents required diligence and commitment. Triangulation, therefore, not only became a methodological necessity but also a means of honouring the trust placed in me by various stakeholders. This integrative approach ensured that no single method or source dominated the research, preventing the omission of crucial aspects and providing a more holistic understanding of the complex and sensitive issues surrounding SEA and accountability.

3.6. Positionality, Power and Reflexivity

Positionality refers the unique viewpoint and approach an individual adopts in relation to research and its surrounding context. It encompasses their worldviews, underlying assumptions about reality and knowledge, and beliefs about human nature and action (Savin-Baden & Major 2013; Rowe 2014; Ormston et al. 2014; Grix 2019). Holmes (2020) defines a researcher's positionality as "an individual's world view and the position they adopt concerning a research task and its social and political context" (Holmes, 2020, p. 1), highlighting its critical role in shaping qualitative research. This concept, as elaborated by Savin-Baden and Major (2013), influences the researcher's perspective, methodology, and findings within a project. Rowe (2014) further emphasizes positionality's impact on research methodologies, outcomes, and interpretations. Thus, positionality is integral in determining the approach and insights gained in qualitative research studies. In the following section, I discuss

[11] Examples of useful online sources include but not limited to Relief Web Sudan Camp Profile, Relief Web Sudan Situation UNHCR External Updates, 'X' accounts such as @UNHCRinSudan, @ICRC_Sudan, @WillCarter_NRC, @TghatMedia, @tigrayyouthntwk, and @InsecurityInsig.

positionality from multiple angles – 1) 'insider' status as a practitioner-research; 2) researcher's power and positionality in relation to researched aid workers in Sudan; and 3) that in relation to researched refugees at refugee camps.

3.6.1. My 'insider' status as a practitioner researcher

My positionality and my understanding of it have evolved through an ongoing journey. At the onset of my research, I had worked within multiple NGOs on development and humanitarian response, encompassing field experiences across Asia, Africa, and Caribbean for 14 years. My work with an international, faith-based NGO led me to lead humanitarian response, manage external relations with institutional donors and peer NGOs, as well as placed me in an advisory role on accountability within a programme quality unit. During the course of my research, I took on a new role of leading global safeguarding across more than thirty country offices, followed by another senior role as head of quality and accountability, encompassing safeguarding remit at a medium-sized NGO. This diverse experience has provided me with three advantages, in terms of organizational support, established networks for data collection, and familiarity with aid worker perspectives. However, it also posed challenges of navigating an 'insider' role during data collection, which I further explore below.

As a researcher who maintained engagements within the NGOs throughout the research process, my sustained engagement and networks in accountability, NGO regulations, and safeguarding facilitated data collection by aiding in participant recruitment and rapport-building. Furthermore, my extensive experience in conducting interviews in the field enhanced the quality of online interactions with my interviewees. For interviews with aid workers in particular, the introduction explaining my practitioner background and reasons for pursuing PhD immediately acted as a magnet to connect with the participants. Comments such as "I look forward to reading your findings and having you back in NGO community so we can learn and improve" were made multiple times (Interviews with A21). My knowledge of current accountability trends also resonated significantly well with participants, fostering enthusiasm and allowing for a more focused exploration of key topics. For instance, one participant demonstrated enthusiasm when I commented on the latest development of accountability initiative that

the participant was leading on, by saying “Wow, that’s great! You are completely up to date. I will just go straight into the details” (Interview with A14). This positive reception streamlined the interview introductions, enabling a swift transition into the core issues. In this sense, the benefits of conducting research with ‘insider’ status contributed to effective data collection.

3.6.2. Power and positionality in relation to researched aid workers in Sudan

In my engagement with aid workers in Sudan, it was crucial that I was perceived as an independent and neutral researcher, a stance I affirmed at the outset of my interactions. Despite my explicit declaration of independence in my introduction, discussions during nearly all interviews with aid workers in Sudan invariably turned towards my prior experience in accountability and safeguarding at the headquarters level of an NGO. My experiences, where interviewees showed reluctance to openly discuss accountability issues I had previously overseen, highlighted the profound effect that power dynamics can exert on the openness of participants. Smith (2005) echoes my experience and argues that participant hesitance in the face of perceived power imbalances, can lead to a communication environment characterized by caution and reserve, especially in research involving sensitive subjects such as mine.

Referring back to Gaventa’s powercube framework, this describes the research in action within the ‘closed’ space (Gaventa 1980), which is intentionally or unintentionally influenced by identity and experience of the researcher, leading to power imbalance. In order to prevent participants from viewing me as an authoritative figure and create ‘invited’ space to involve participants in more equitable and inclusive manner, I adopted a neutral stance and reiterated my commitment to an independent and neutral approach. This deliberate positioning was designed to counteract any potential perceived power imbalances linked to my prior organizational role, which could unduly influence participant responses.

3.6.3. Power and positionality in relation to researched refugee participants in camps

Similarly, in engaging with refugee communities, particularly during the Covid-19 pandemic, the necessity to navigate complex and unequal power dynamics among the various stakeholders involved

in the research became paramount. These stakeholders included myself as the researcher, the interpreter serving as linguistic bridges, and the refugees who were the focal point of the study. The literature on refugee research (Guillemin and Gillam 2004; Vervliet et al. 2015; Krawczyk & Dieudonne 2023) provide an extensive discussion on the positionality challenges and complexities inherent in these relationships. Specifically, these literatures highlight the critical need for researchers to be acutely aware of how they might be perceived by refugee participants, potentially as figures of authority wielding significant power over the research context and outcomes.

Further complicating these dynamics was the shift to online interactions with refugees due to the constraints imposed by the Covid-19 pandemic. This highlighted the importance of critically examining my own positionality and the ways in which my identity and privileges could shape our interactions. The absence of physical cues in these virtual exchanges brought to the forefront how factors like race, nationality, and professional status might influence communication and power dynamics, echoing concerns raised by Podar (2024) in her participatory action research with refugee women during the same pandemic period.

By acknowledging my positionality, I aimed to cultivate empathy, mitigate power imbalance through considerate communication, and ensure an ethical, equitable research process. This awareness was crucial for fostering a respectful setting, allowing refugees to share their experiences, emphasizing my responsibility to conduct research that honours their voices and perspectives. For English-proficient refugees, I engaged early via WhatsApp, building rapport crucial for meaningful interactions. Those familiarized with me beforehand were more open during online interviews, seeing me as an advocate for their concerns through my research. Conversely, those without prior online interaction perceived me as an outsider, often resulting in communication barriers. Recognizing and navigating these perceptions was vital for establishing trust, ensuring fairness, and accurately capturing their experiences. Bilotta (2021) emphasizes the necessity of respectful and non-harmful interactions and advocates for cultural sensitivity in the researcher-participant relationship, a principle that guided my approach to engaging with the refugee communities.

As a result of adopting this ethical position, I interpreted reports of SEA on a case-by-case basis, and where necessary also consulted my supervisors for guidance, taking different action in different instances. Having discussed positionality and how it influences the research process, the next section covers reflexivity, an equally important key approach that guided my research in conducting research and engaging with the research participants in a respectful and sensitive manner while also being mindful of power dynamics among the researcher and researched at play.

3.6.4. Building reflexivity into research

Reflexivity, as defined by Malterud (2001), is the ongoing awareness of the researcher's influence on knowledge construction throughout the research process. Drawing from my extensive background as an aid worker with over 15 years of experience, my engagements with affected populations have profoundly informed my perspectives on accountability and safeguarding, embedding of the ethical nuances in research practices. This section elucidates the strategies I employed to ensure reflexivity, emphasizing the active challenge and reassessment of my preconceptions throughout my research.

As my research unfolded, continual reflection of the way in which I, as a critically engaged, practice-informed researcher, conduct the research increasingly became an important exercise. The study by Stirrat & Henkel (1997) showed that research can be compromised if the researcher fails to question their own biases and places too much emphasis on their personal interpretation of events, rather than understanding how those events are viewed and experienced by others. My reflective journal entries serve as tangible evidence of this reflective process. For instance, after an interview with a participant I had previously worked with, I noted:

> *"I feel like I know her answers before I ask her these questions. Am I assuming too much? She answered exactly how I expected her to answer. Did I ask misleading questions? Did I interpret her answers with my biases of working with this individual on accountability? Should I have pretended that I didn't understand her point and ask her for further clarification?" (Researcher's journal).*

Such reflections indicate the challenges posed by my familiarity with the subject matter, prompting me to critically evaluate my biases and pre-existing knowledge. To mitigate these risks, I embraced a conscientious approach to reflexivity, as delineated by Finlay & Gough (2003), who describe it as "an active mode of consciousness that necessitates an act of stepping back" (99).

This involved posing questions to interviewees where I presumed I knew the answers, which allowed me to uncover insights and viewpoints that differed from my initial assumptions. In some interviews, particularly with those I had worked with previously, the participants' assumptions of my knowledge often led them to omit explanations, by commenting "well, you know what I mean" (Interview with A7). This strategy was particularly pertinent in interviews with individuals I had previously collaborated with, where participants might assume my familiarity and consequently skip over details, remarking, "well, you know what I mean" (Interview with A7). In such instances, I actively sought clarifications, thereby prompting a more thorough and explicit articulation of their views.

This practice of active reflexivity was instrumental during the data collection phase, offering a framework to navigate the complexities inherent in conducting sensitive interviews. It fostered an environment conducive to critical reflection, allowing for a nuanced engagement with the research material and ensuring the ethical rigor of the research process. Through this lens, reflexivity emerged not merely as a methodological tool but as an ethical imperative, guiding the research towards a more authentic, responsible, and inclusive exploration of the lived experiences of refugee communities.

3.7. Ethics

3.7.1. 'Ethically important moments': The disclosure of safeguarding cases

In conducting research within communities, particularly those that are vulnerable or have experienced significant trauma, the concept of 'ethically important moments' as defined by Guillemin and Gillam (2004) becomes crucial. These moments refer to the challenging, often subtle, and unpredictable situations that arise during the practice of research, where there is a potential for harm or ethical

dilemmas. My approach to engaging with communities was deeply informed by a commitment to ethical integrity, which was demonstrated through the implementation of rigorous research protocols aimed at minimizing distress or harm to participants. This commitment was grounded in both my firsthand experience in safeguarding and emergency response and was further shaped by best practice guidance from the NGO community (UNHCR 2021) and academic researchers (The UK Collaborative on Development Research 2022; Orr et al. 2022).

Central to this ethical approach was the respect for respondents' privacy, values, and beliefs, formalized through mutual agreements on informed consent, confidentiality, and data protection. In the delicate process of participant selection, care was taken not to explicitly seek out individuals with specific experiences of SEA, nor to probe directly about personal encounters with abuse, adhering to ethical standards that prioritize participant well-being and prevent unnecessary distress.

Despite these precautions, several participants expressed a willingness to discuss the topic of SEA, highlighting the pervasive nature of the issue and the need for research and action. One participant highlighted the importance of addressing this subject:

> *"This is such a taboo topic, and nobody wants to talk about it but it's everywhere. It's good that you are looking into this topic because we need to take actions and stop pretending nothing is happening" (Interview with B16).*

This openness emphasizes the complexity of ethical engagement and the significance of creating a space where participants feel safe to share their experiences.

The ethical framework guiding this research was further tested when sensitive stories emerged during data collection, including instances that required immediate action due to concerns of ongoing harm. These situations exemplify the 'ethically important moments' where the researcher must navigate the delicate balance between confidentiality, the duty to report, and the imperative to 'do no harm' as explicitly emphasized within the guidance from both the UK Collaborative on Development Research and the International Association for the Study of Forced Migration Research Code of Ethics.

In confronting these ethical dilemmas, reflexivity—in the sense of being ethically sensitive and aware of the micro ethical dimensions of research practice—became essential.

> *"Being reflexive in an ethical sense means acknowledging and being sensitized to the micro ethical dimensions of research practice and in doing so, being alert to and prepared for ways of dealing with the ethical tensions that arise" (Guillemin and Gillam 2004: 278).*

This reflective practice and ethical considerations were particularly valuable during 'ethically important moments' when an interviewee shared sensitive issues and experiences. The disclosures fell into two main categories: i) general observations of SEA within the camps (outlined in Chapter 5 section 3), and ii) specific instances of SEA that led to suicide (referenced in Chapter 6 section 2.5). When participants conveyed their overall observations and showed signs of distress during the interviews, this prompted me to apply the ethical guidelines and reflexive practices I had previously outlined. Acknowledging the significant emotional impact of these disclosures, I ensured to proceed with empathy and caution, prioritizing the comfort and consent of my participants throughout. This included offering them control over the interview process, allowing them to pause or end the conversation at any point, and ensuring they were aware of support services available to them. Notably, all participants who shared sensitive information were English speakers, eliminating the need for an interpreter.

For disclosure of specific incidents of SEA (Chapter 6 section 6.2.5), the ethical considerations became even more paramount. In these instances, I took extra steps to assess if there was any ongoing harm. It required a careful assessment of the accuracy of the data, the ongoing nature of the misconduct, and the potential threat to the safety of the participant and the broader community. A subsequent interview, conducted as part of my ethical responsibility, provided reassurance that the misconduct was a historical concern, mitigating immediate safety concerns of the individual as well as the wider refugee community.

In such 'ethically important moment', Bilotta (2021) emphasizes the importance of extending ethical consideration beyond procedural compliance to encompass relational ethics, a principle that guided my approach to dealing with ethical tensions. This ethical reflexivity required not only adherence to

established ethical guidelines but also understanding of the specific contexts and needs of the participants, ensuring that research practices do not exacerbate harm and genuinely contribute to the well-being and empowerment of the communities involved.

3.7.2. Managing expectations and minimising harm

Managing participants' expectations during recruitment was crucial to minimize risks for harmful practice and ensure ethical conduct in my research. I became aware that two refugees had approached my interpreter, expressing a willingness to be interviewed in exchange for financial support. They were willing to share information on their lives in the camp in general as well as their personal experiences of SEA. In this situation, they held false expectation that help, or specific benefits may be offered to them following the interviews.

It is my ethical responsibility as a researcher to minimize risks for harmful practice within the local context. Therefore, to address these expectations, I took proactive measures by clearly outlining the benefits and risks in the participant information sheet distributed during the recruitment process and when obtaining informed consent. This involved conveying a transparent message that set ethical boundaries and providing a rationale rooted in reflexivity.

Recognizing the potential harm that proceeding with the interviews could cause, especially in re-traumatizing interviewees by discussing sensitive experiences, I refrained from conducting the interviews with these two individuals. Subsequently, in a meeting with my interpreter, I emphasized the importance of ethics and articulated my intention to adopt a survivor-centred approach. This approach aimed to prioritize the needs and well-being of the participants, avoiding exposure to further vulnerability or harm. In doing so, I sought to ensure that my research upheld ethical standards and prioritized the welfare of the participants.

3.8. Conclusion

In this chapter, I provided a detailed exploration of my interpretivist, qualitative research methodology, explaining how I divided the data collection for the study into two distinctive phases. The first phase involved a thorough investigation of the Core Humanitarian Standard (CHS), employing the 'What's the Problem Represented to be?' approach. This method aimed to uncover the CHS's origin, exposing power dynamics at the board level and throughout the consultation process. Through a systematic dissection, the goal was to reveal hidden assumptions and gaps within the CHS, fostering a nuanced understanding of its foundational structures. Moving to the subsequent stage, the research transitioned to a case study, focusing on refugee camps in Sudan, with a specific emphasis on two selected camps. I expounded on the rationale behind opting for a case study highlighting the importance of understanding the complexities of refugee camps to dig into context-specific insights.

Throughout this research endeavour, meticulous attention was given to my positionality as an insider, adopting a critically-engaged, practice-informed stance. Ethical considerations were paramount, guiding the research process to ensure its appropriateness and ethical integrity. Moreover, this research has reinforced the significance of reflexivity, an active and ongoing process that involves stepping back, critically examining assumptions, and maintaining a heightened awareness of my influence on knowledge construction. The engagement with aid workers in Sudan revealed the nuanced dynamics of participant responses, where acknowledgment of my awareness of sector challenges facilitated more critical perspectives.

In the following chapters, I will present the discussion and analysis of CHS and the processes behind its creation, before discussing the realities of complaint mechanisms on the ground in camps in chapters 5 and 6.

Chapter 4. Problem representation of accountability within the CHS

4.1. Introduction

Following Chapter 3 on my research design and methodology, the chapter will focus on the Core Humanitarian Standard (CHS), the most widely used humanitarian standard (Gibbons 2018; Cuaton 2019; Daun 2020). This chapter unpacks the CHS and identifies the themes, hidden core assumptions and silences behind the standard to reveal the original intent of accountability to affected populations (AAP). It examines where the PSEA debates sat within the wider humanitarian landscape at the time of consultation, leading up to the launch of the CHS in December 2014.

Using discourse analysis, exhaustive documentation reviews from the consultation, and drawing on 34 interviews with sector specialists, PSEA experts and stakeholders involved in the CHS consultation, the chapter argues that the CHS addresses the pressing issues in accountability at the time of Consultation Process in 2014. However, despite efforts to make it future-proof, due to the shifting humanitarian context and the evolution in discourse surrounding accountability, the CHS does not sufficiently address the root causes of accountability deficits which have surfaced since 2014. The chapter further stresses the impact of recent global societal movements on discussions surrounding accountability in context of safeguarding within the aid sector. I conclude the chapter by arguing that the CHS can maximize the opportunities to respond to complaints of SEA if power imbalance is more explicitly addressed with increased coverage of PSEA within the CHS.

The Chapter aims to answer my first research sub-question and is divided into two parts. In the first part, I introduce my case study of the Core Humanitarian Standard of Quality and Accountability (CHS). I present brief exploration of what has led to the creation of the CHS with particular focus on the Joint Standards Initiative. I further examine the CHS Consultation Process to reveal the methodological insights into how the Consultation Process was conducted. This section provides considerations on how the consultation methodology and process influenced the dynamics of stakeholders involved, the extent

to which consultation sought inputs from stakeholders at different levels from NGOs of diverse size and locations, as well as the use of language within the CHS.

Having laid the background of the CHS creation, I then proceed to the second part of the chapter which explores my first research sub-question:

> *To what extent does the CHS, in providing as sector-wide standard in accountability, maximize the opportunities for NGOs to respond to complaints of SEA?*

In order to answer my first sub-question, I deconstruct the CHS by digging deeper into core assumptions and presuppositions that lie behind the standard through the use of *'What's the Problem Represented to be'* Approach. The WPR approach uses a set of six questions to explore "discursive aspects of policy, including how problems are represented in policy and how policy subjects are constituted through problem representations" (Goodwin 2012: 67). It provides analytical lens to question what is taken for granted – assumptions that aid workers accept as they are without challenging or questioning. The second part of the chapter thus reveals the empirical findings from exhaustive examination of texts within the CHS itself, qualitative semi-structured interviews, as well as documentation review. Based on Gaventa's powercube approach, the Chapter further analyses how various dimensions of power were manifested within the CHS Consultation Process and also provides a separate analysis on the CHS standard itself, revealing hidden assumptions and silences that lie behind the standard. The chapter concludes with my key claim that the CHS itself can better enable the opportunities to respond to complaints of SEA if power imbalance is more explicitly addressed with increased coverage of PSEA within the CHS.

4.2. *Why* create the Core Humanitarian Standard?

4.2.1. The introduction of the Core Humanitarian Standard

Established in 2014, the Core Humanitarian Standard of Quality and Accountability (CHS) is an international humanitarian standard that aims to guide aid organisations to enhance quality and

accountability of their aid operations. Known to be the most widely used (Gibbons 2018; Cuaton 2019; Daun 2020), the CHS continues to be the notable leading standard for the sector, putting people affected by crisis at the centre of humanitarian actions. It is "both a voluntary and a verifiable standard, and agencies can opt to undergo third-party verification carried out by an independent organisation" (Hilhorst et. al 2019: 15). Underpinned by humanitarian principles, this 'humanitarian plus' standard offers concrete guidelines with nine commitments supported by measurable indicators that aid organisations and humanitarian workers can refer to as a voluntary standard or as a basis for verification of performance.

Drawing together essential components from a range of predecessor humanitarian standards, the CHS is the result of a global consultation process, replacing "three of the largest quality and accountability initiatives in humanitarian assistance" (Joint Standards Initiative: Terms of Reference for JSI Advisory Group on Standards and Organisations). These three standards are:

- *The 2010 Humanitarian Accountability Partnership Standard in Accountability and Quality Management (HAP);*
- *The People in Aid Code of Good Practice in the Management and Support of Aid Personnel (People in Aid);*
- *The Sphere Project.*

HAP is a self-regulatory international initiative to promote accountability to affected populations. As the successor to the failed Humanitarian Assistance Ombudsman (HAO) who was designed to police NGO accountability, it was considered to be "the most institutionalised self-regulatory accountability mechanism in the aid sector [as of 2016] and the best-known initiative advocating for downward accountability" (Deloffre 2016: 725). Kennedy (2019), who process traced the development of HAP until the birth of the CHS in 2014, claimed that HAP was the only standard in the sector that focused on compliance verification and certification before the establishment of CHS.

People in Aid, an aspirational standard which emerged as a result of crisis in the management and support of NGO staff during the 1994 Rwanda crisis, provides guidelines on human resources and

management for aid workers. The Sphere Project, the most frequently used among the three (The Joint Standards Initiative Global Stakeholder Consultation Report 2013), is a voluntary initiative that offers technical guidance and sets out minimum standards in the WASH, Food Security, Shelter, and Health sectors in the context of conflicts and disasters.

The three standard initiatives were established in parallel with clear unique characteristics and the same overarching goal of improving accountability to affected populations. While clear identity with distinctive objectives was important, significant overlap in constituency and duplication of efforts began to emerge among humanitarian organisations and workers, causing confusion over priority of standards and level of compliance to be applied in humanitarian actions (Purvis 2015; Sphere 2015; Humanitarian Quality Assurance Initiative 2020).

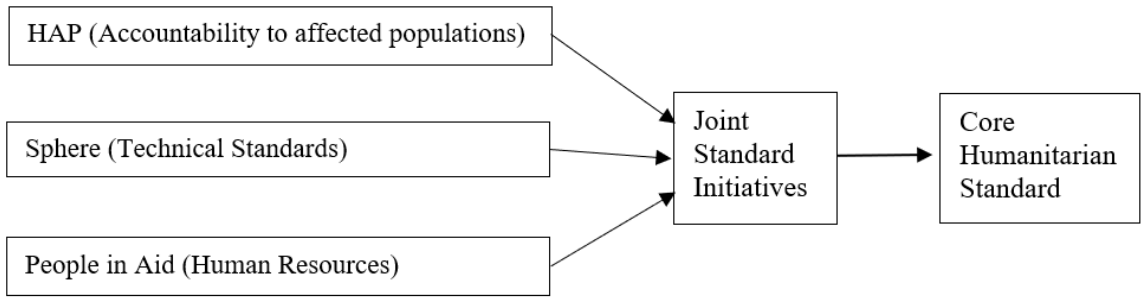


Figure 6. Revolution to the CHS

4.2.2. Demands for harmonisation of accountability standards

In response to the sectoral concerns regarding the multiplication of standards creating confusion and duplication of efforts, the three standard initiatives formed the Joint Standards Initiatives (JSI) in 2011 (The Joint Standards Initiative Terms of Reference for JSI Advisory Group on Standards and Organisations, no date). Its key objectives were to examine the extent of compliance against the three standards in the field and to explore options for uniting the three standards into a single coherent framework (JSI Global Consultation Report 2013). The JSI consulted with more than 2,000 stakeholders from 144 countries across the sector. Over 50 organisations hosted focus group discussions with 421 individuals from the affected populations at the field level; online surveys were conducted

with responses from 1,001 individual aid workers. 162 semi-structured stakeholder interviews were also conducted in Arabic, English, French and Spanish.

The resulting 72-page comprehensive global consultation report revealed strikingly high level of demands for harmonisation of the standards, as supported by 98% of survey respondents (CHS Launch Report 2015). There was a growing emphasis on the need to consistently highlight and amplify the voices of affected populations. This momentum was further complemented with compliance-based pressure for upward accountability for donors and regulators. The report identified the core problems as follows:

> *"The humanitarian landscape has been transformed and continues to evolve […] the growing role of the new/non-traditional actors, the multiplication of NGOs, the increased voice of affected populations, the weakening of 'principled' humanitarian action and the rapid uptake of communication technology in crises" (Launch of the CHS and Outcome of the SCHR Certification Review: 2).*

This illustrates the sector's need to adapt to a changing environment, where traditional models of humanitarian action are being challenged and the lines between humanitarian and development work are increasingly blurred.

4.2.3. The Joint Standards Initiative consultation and the visible form of power

The interplay of visible forms of power during the Joint Standards Initiative (JSI) consultation process presents a stark illustration of the dynamics of power within the humanitarian sector, as revealed through my interviews. Despite the broad scope of the global consultation, there was a pervasive sense of frustration among participants. This frustration stemmed from the speculations of key stakeholders who led on JSI that decisions regarding action plans had already been made prior to the dissemination of the JSI Consultation findings to the Boards of the three initiatives (Interview A17, A20). This scenario illustrates the exercise of visible power within closed spaces, a concept explored in depth in Chapter 2, Section 2.6 of this study. The decision-making process, conducted behind closed doors and

without broader stakeholder consultation, stresses a fundamental issue of power imbalance and lack of inclusivity in governance structures.

Further elaboration of the visible form of power is evident through the accounts of participants who described the process as “extremely whitewash, led by six Western males” (Interview with A28); and another participant described it as “Geneva-centric, dominated by white senior males” (Interview with A18). These descriptions highlight not only the geographical concentration of power but also the gendered and racial power imbalances at the global level.

The exclusion of diverse voices and the subsequent disillusionment among participants are evident in the actions of some who chose not to engage in the CHS Consultation Process that followed the JSI. They both felt that all their efforts put into JSI Consultation had been wasted (Interview with A34). This demonstrates a profound dissatisfaction with the integrity of the consultation process. The sentiment that their contributions to the JSI Consultation were ultimately disregarded highlights the concern that a range of voices and perspectives are undermined by the dominant power structures. The sentiment that contributions were disregarded exemplifies the visible exercise of power, where decisions are made and controlled by a select few, undermining the broader participatory intentions of the consultation.

As a result of JSI, the focus of the sector in the area of accountability narrowed to address the demand for a sectoral architecture that links multiple standards together for harmonisation and greater coherence while putting people affected by crisis at the centre of the standard (Interview with A4; CHS Launch Report, JSI Global Consultation Report 2013; and CHS Consultation Process 2014). The signing of a joint agreement by HAP, People in Aid, and Sphere to develop a common humanitarian standard reflects an aspiration towards greater coherence and unity. However, the process leading up to this agreement, as narrated by the participants, stresses the need for a more democratic and inclusive approach to decision-making and standard development.

4.3. The creation of the CHS

4.3.1. CHS Consultation: Methodology

Following the Joint Standard Initiatives, the HAP, People in Aid, and Sphere sustained the sectoral momentum towards harmonisation of standards. They spearheaded the development of a common accountability standard through a 12-month, three-stage consultation process. Building upon work on AAP from as early as 2004, when the earliest AAP work was started by Building Safer Organisations Handbook (2007), the CHS Consultation Process took consideration of lessons learnt from previous standard creations and involved a wide variety of stakeholders from diverse types and sizes of organisations in the Global South and North.

The 'Open Standard[12]' methodology which was utilised for this process, emphasised a broad consultative, inclusive approach and information sharing for widespread adoption. It created an open space for critical inputs and reservations to be addressed, as reiterated during my interviews with key informants involved in the CHS Consultation Process (Interviews with A9, A25). This approach addresses challenges raised during the Sphere consultation process by incorporating mechanisms for disagreement, debates and innovation to warrant the inclusion of critical voices from affected populations (Pym and Hooper 2017). The donors, government representatives and those from aid

Targets for Engagement

	Engagement target
NGO	An equal balance from small and large NGOs from the North and South, both development and humanitarian, is achieved, ensuring members of HAP and People In Aid and committed agencies of Sphere form part of groups 1 and 2
INGO	Representation from INGOs across the board is achieved, ensuring members of HAP and People In Aid and committed agencies of Sphere form part of groups 1 and 2
Governments	Representation from disaster prone contexts in group 1 and others in group 2 and 3.
UN	Representation from main agencies in Group 1
RC/RC	Representation from ICRC and IFRC in group 1 and 2 and partner National Societies in group 1. Other National Societies participate in Group 2.
Beneficiaries	Participation in group 2 and 3 and targeted feedback solicited for group 1.
Donors	Institutional donor participation in group 1 and 2. Foundations and other funding mechanisms engagement in groups 2 and 3.
Academics	Participation in group 1, 2 and 3
Private Sector	Participation in groups 2 and 3
General Public	Engagement in group 3

Figure 2: Engagement groups

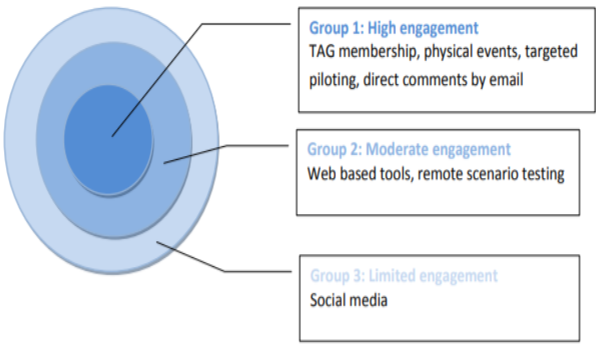


Figure 7 CHS consultation and decision-making process

[12] "Open Standards" are standards made available to the general public and are developed (or approved) and maintained via a collaborative and consensus driven process" – CHS Consolation and Decision Making Process. 2014.

organisations at leadership level highlighted the nature of open, collaborative engagements where they felt their inputs were taken into consideration throughout the consultation (Interviews with A6, A8, A9, A12). It also needs to be noted that some respondents expressed conflicting opinions to above and felt there was a dominant group of stakeholders – male and in senior leadership positions at international NGOs based in Geneva and London. Those interviewees in middle seniority indicated a sense of disappointment as they were excluded and "not allowed to join" (Interview with A11) at the consultation meetings although they were the frontline advisors who would mainstream the CHS to their country programmes.

At the beginning of the process, stakeholder mapping analysis was conducted to classify categories of stakeholders. This identified the following groups as engagement targets: national NGOs; international NGOs; governments; the United Nations; Red Cross and Red Crescent Movement; affected populations; donors; academics private sector and general public.

Based on the consensus-drive approach, around 1,000 contributions were received from aid organisations, networks, and individuals and two physical meetings were held in Geneva and London. A series of online surveys and IdeaScale[13] were deployed, reaching out to a wide range of stakeholders, and targeted interviews were undertaken with CHS stakeholders. This collaborative approach was intended to help ensure that the new harmonised standard was representative of collective intelligence and knowledge of aid organisations across the sector and the world, addressing specific challenges on AAP (CHS Consultation Process Overview 2014). As a result, three draft versions were produced, with each version offering opportunities for feedback. The final version of the CHS was approved and launched in December 2014.

[13] IdeaScale is an innovative tool to capture, develop, prioritise, and select ideas to connect ideas into outputs. It must be noted that although this tool was mentioned in the CHS Consultation Process Overview (2013), no subsequent reports referred to the IdeaScale to describe how this tool was utilised.

4.3.2. CHS Consultation: Governance structure

Throughout the consultation in 2014, the CHS Joint Board Committee oversaw the implementation of the process. As designated representatives of the Boards of HAP, People in Aid and Sphere, they acted as vocal, proactive project champions individually and collectively through their networks. According to its Terms of Reference (2014), their objectives were as follow:

"In order to ensure the final version of the Standard is developed in a transparent and inclusive manner,

- Provide oversight to ensure the project delivers on its objectives, remains within its scope, or where appropriate, approve scope changes;
- Act individually and collectively as a vocal and visible project champion through its representative organisations and networks;
- Consider recommendations from the Project Executive where there are cost, quality or time concerns about the project that may affect the reputation or mission of those involved; and help resolve policy decisions, political issues and risks; and,
- Approve the final version of the CHS at the end of the consultation process" (CHS Alliance 2014: 2).

All the official CHS Consultation Process documentations offered technical description of the role the Joint Board Committee had played. The process was accompanied by two Project Consultants who had extensive experience in consultation and management process. They acted as the principal link with the working groups and produced quarterly progress reports to the CHS Joint Board Committee.

Under the CHS Joint Board Committee, two sub-committees and a writing group were established to support the CHS consultation process - i) CHS Technical Advisory Committee; ii) CHS Technical Steering Committee; and iii) CHS Writing Up Group. CHS Technical Advisory Group (TAG) comprised 64 members representing a diverse range of technical expertise in humanitarian action and standards development from international NGOs, national NGOs across the five continents, donor governments, standard setting initiatives, academics, and United Nations agencies (CHS Alliance Terms of Reference 2014). The TAG contributed to the drafting of the standard, approving the scope, its objectives and verifiability of the standard. The Committee had decision-making authority to approve drafts ready for the wider consultation. CHS Technical Steering Committee (TSC) of 14 members was

mandated by the TAG to revise the standard based on the first round of consultation and produced the second draft for testing and piloting. Both committees were composed of individuals with experiences in development and use of standards within and outside the aid sector, as well as organisational structure and humanitarian actions.

4.3.3. CHS Consultation: Timeframe over the three staged-process

The CHS Consultation Process took place in three stages covering consultation, piloting and finalisation of the standard which lasted from December 2013 to December 2014.

Figure 4: Phases and Timing of the CHS Consultation Process

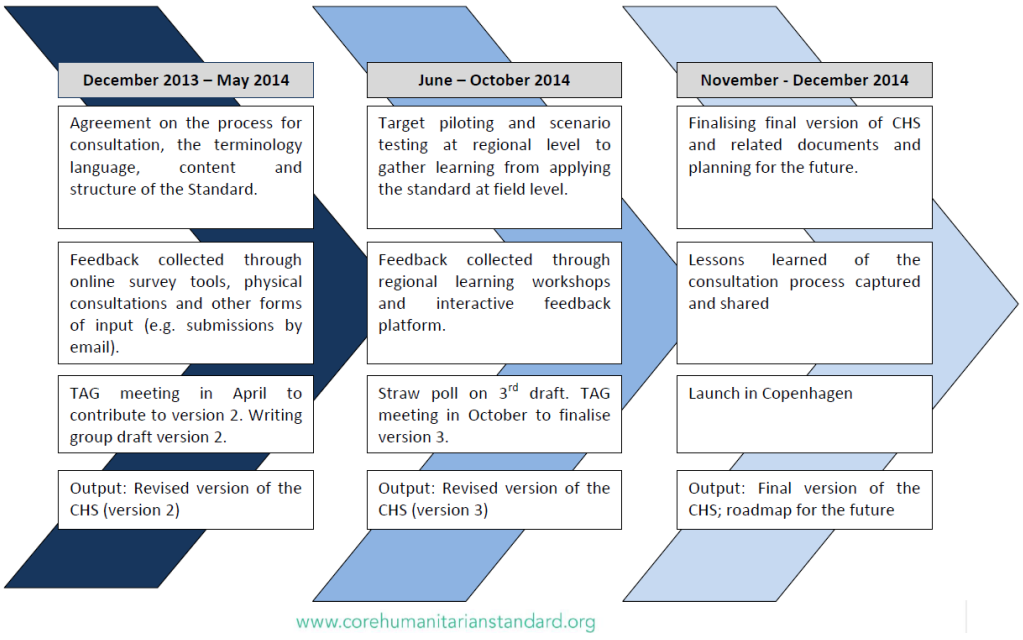


Figure 8. CHS consultation phases and timeframe

The first stage focused on coming to agreements on the language, structure, content and terminology of the standard. The interviews with key informants identify four common themes of discussions – i) humanitarian principles particularly around neutrality; ii) aspiration for standard harmonisation; iii) putting affected populations at the centre; and iv) addressing challenges of fulfilling conflicting upward

and downward accountability (CHS Consultation and Decision-Making Process Revised 31 July 2014). The analysis of key documents further highlighted strong emphasis on AAP and a clear ambition of TAG to ensure genuine empowerment of affected populations. A meeting note illustrates this as follows:

> *"The purpose of the CHS should reflect the notion that accountability is an empowerment process ... and put local organisations, front line staff, and communities affected by crisis as the principal concern of the CHS" (CHS Technical Advisory Group Meeting Minutes: 29-30 April 2014).*

Feedback in the first stage was collected through online survey from 142 agencies and via in-person consultation meetings in Kenya, Myanmar, Pakistan, South Sudan, and Zimbabwe to receive direct feedback from the staff in the field. More than 170 pages of feedback were provided to TSC. One of the stakeholders in TSC who was later involved in the Writing Group recalled that members had around 30 pages each to review and incorporate feedback into the second version of the draft (Interview with A25). TSG directly and repeatedly mentioned HAP's commission study on beneficiary perceptions of prevention of sexual exploitation and abuse (PSEA) activities (The HAP International 2010). A particular emphasis was placed on the usability and practicality of the standard as well as the four specific humanitarian principles (humanity, independence impartiality, and neutrality). At this point of consultation, overarching discussions on humanitarian principles and standard harmonisation could and should have inherently included a focus on establishing clear effect accountability mechanism to prevent harm including SEA.

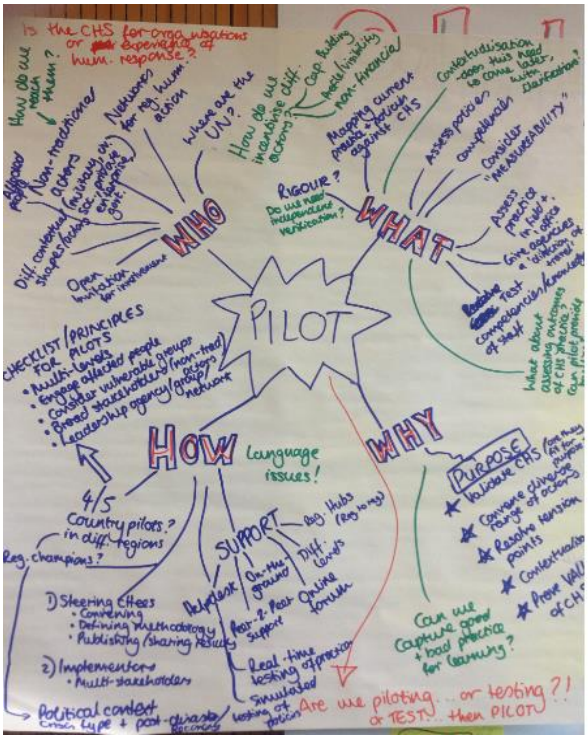


Figure 9. Mindmap at Technical Advisory Group meeting on April 2014

The second stage of the CHS Consultation Process focused on target piloting and scenario testing from June to September 2014. As can be seen from Figure 1, the mind map sketched at the TAG meeting in April 2014, extensive discussions took place to shape the objectives of this stage, exploring what the pilot testing should entail, for whom, for what purposes. The meeting minutes (Core Humanitarian Standard 2014i) indicates that the objectives were agreed to gauge the level of usability, relevancy, accessibility, and verifiability of the standard as a tool to enhance quality and accountability of aid programming. Feedback at this stage did not specifically include how the draft CHS could facilitate the implementation of complaint mechanisms and SEA prevention efforts in varied contexts. During this stage, the revised Standard was applied at the headquarters, programme and project levels, and feedback was collated from 29 agencies[14] across 14 countries[15] (Core Humanitarian Standard 2014e).

[14] The full list of agencies: Action Aid, Adra, CAFOD, Care, Christian Aid, COAST Trust, Concern, CRS, CWSPA, DanChurchAid South Asia, Development Action without Borders, EFICOR, Indo Global Social Service Society, IOM, Islamic Relief, Mavi Kalem Social Assistance and Charity Association, Mercy Malaysia, Muslim Hands UK, PGVS, Plan India, Plan International, Save the Children International, SEEDS, Sphere India, Strengthening Participatory Organization (SPO), Support to Life, Wetlands International, World Vision, and ZOA Relief.

[15] The full list of participating countries: Bangladesh, Colombia, Ethiopia, Switzerland, India, Jordan, Kenya, United Kingdom, Malaysia, Netherlands, Niger, Pakistan, Somalia, and Turkey.

The testing agencies also contributed to baseline data collection – scoring against each indicator to assess the level of compliance for their operations. Depending on the average level of compliance, TAG and TSC adjusted indicators to match the robustness of the indicator requirements. The testing exercises further helped generate concrete, tangible ideas, which informed Version 3 of the standard. A straw poll was then conducted to assess the level of acceptability of the standard by the aid organisations across the sector. A total of 369 individuals and 73 aid agencies completed the poll, with 79% of respondents approving the standard. The striking findings from the 'CHS Consultation Process: Analysis of Results from Version 3 Straw Poll' include high endorsement from national NGOs (86%) and international NGO represented individuals based in the Global South (86%). Despite this high endorsement, 38% of the government donors and 37% of NGO network secretariats indicated that they were not ready for finalisation of the standard.

The interviews with key informants, however, revealed a reluctance to provide open, honest feedback due to the non-anonymous nature of consultation (Interview with A13). This indicates the possibility of biased, incomplete analysis and results from the straw poll. The need to make it fit for smaller organisations and insufficient coverage of PSEA across the standard were also reoccurring feedback from many participants in the Straw Poll as well as from the key informants (Interviews with A4, A13, A25). Feedback from this stage could have been instrumental in refining the CHS to better support the design and implementation of complaint mechanisms.

The final stage was centred on finalisation of the standard, adoption of CHS by the three signatory initiatives (HAP, People in Aid and Sphere Project Boards), the CHS Launch Event, and development of future planning for periodic review of the standard. The CHS Launch Event was held in Copenhagen in December 2014 and was attended by high-level senior leaders of the sector. Its objective was to launch the CHS but also to review findings from the Steering Committee for Humanitarian Response (SCHR) Certification Review and explore implications of the CHS and potential certification scheme for the sector. The documentation review and data from interviews coupled with review of a video recording of the event (Core Humanitarian Standard 2015) revealed a significant appreciation for achievement to have developed a harmonised standard for the sector, reiterating that the CHS is to be

"owned collectively by the sector and as such ultimate accountability for the revision of the CHS will be collective and inclusive" (CHS Launch Event Master Presentation 2014). This is where HAP and People in Aid signed off to merge and form a new organisation (now called CHS Alliance), with the CHS at the centre of its mission and service provision.

Overall, the consultation process, while extensive, highlighted areas where stakeholder input on SEA prevention and the accessibility of complaint mechanisms could have been more thoroughly incorporated. The effectiveness of the CHS in protection affected populations from SEA and ensuring accountability is closely linked to its capacity to frame and address SEA. Having set the scene of CHS consultation process and its power struggle, the subsequent section will identify some key observations from the interviews, which help us to understand why the problems of SEA and potential of complaint mechanisms look the way they do in the CHS.

4.4. Manifestation of power within the CHS Consultation Process

4.4.1. Microcosm of sectoral power struggles

The documents reviewed for my analysis did not engage with a critical aspect that emerged as a consistent theme in interviews — the power frictions among the boards of HAP, Sphere, and People in Aid. Although JSI recommended harmonizing the standards and integrating the three into a single coherent framework, the organizations did not share a cohesive vision. One interviewee remarked on the inherent tensions:

> *"There were a lot of tensions between the three organisations. The part of the challenge was that the three organisations were in a way forced to not only work together to create one standard but also to merge. This has definitely created tension and made it much more difficult to work together because, of course, as one of the stakeholders puts it, you don't ask a turkey to vote for Christmas so asking three organisations to merge was a mistake" (Interview with A8).*

The tensions described by the interviewee highlight the complex dynamics that can occur when separate entities with their own distinct identities, cultures, and visions are pushed towards integration. In my documentation review, I specifically looked for formal evidence of the power dynamics that can arise when separate entities merge into one. Despite the interviewees highlighting tensions, I found no official consultation reports that made reference to this friction. This suggests a gap in the formal documentation of the integration process, where the interplay of power, resistance, and cultural differences among the entities was not captured or acknowledged in official records. This is a clear manifestation of power at play whereby three powerful institutions battled over to maintain their influence by controlling decision-making.

The rising political tension among the boards of the three standard initiatives was however clearly evident according to my interviewees who participated in the consultation meetings (Interviews with A4, A7, A15, A21). An interviewee shed light on the difficulties of the consultation process: "it was a challenging consultation process because each initiative had different ideas on what the new standard should look like; we all want the same thing but we had different philosophy on how accountability in the sector can be achieved" (Interview with A14).

Given the context above, the insights from the interviews revealed challenges from the beginning of the consultation process, highlighting disruptive nature of stakeholder participation at face-to-face meetings. A participant who contributed to the consultation process recalled as below:

> *"It started with a political crisis…I had never seen anything like this before. At the first technical advisory committee meeting, there were about 60 people – big donors, big NGOs you name them. By 11am, the disruptions in the room were just unbelievable. It was just so open, like people sniping at the table and I had to actually yell at some point to call the meeting to order. We could not do what we set out to do…that meeting became a group emotional debrief to rally them around the idea of why we are actually doing this" (Interview with A17).*

Multiple interviewees described this particular meeting as difficult and challenging consultation, and for a small number of stakeholders who took part in closed-door meetings among the board, it was

obvious that the political tensions hindered effectiveness of the consultation. All participants among my interviewees who attended the first consultation meeting stressed political tensions overriding the initial intent of the consultation process, one describing as "how the politics became toxic and sap a lot of energy out of people" (Interview with A16). The situation escalated to such a degree that it became necessary to appoint someone specifically to handle the political negotiations within the CHS Board Committee. In my interview with this individual, she confirmed the challenges of collaboration among the boards. Her role involved understanding tension points and mitigating conflicts. For those outside the CHS Board Committee, witnessing power battle was intriguing. One participant recalled the contradiction between the commitment to creating a standard to empower communities and the apparent consolidation of power for personal benefit, expressing:

> *"While we were all there to come up with a standard to empower communities but yet what it seemed to happen was that they worked to consolidate various power among themselves for their own benefits and not give back power to the communities" (Interview with A18).*

The data from wider stakeholders further exposed intensifying frictions particularly from the Sphere Board. One participant reiterated that

> *"Sphere was always the disrupting force … they were frequently pushing back during the consultation. It appeared that Sphere did not want to lose its identity and do not want to let go of their power…It reached the point where some people said that the best way to unite people was to find a common enemy" (Interview with A17).*

Moreover, the interviews further revealed a palpable tension, especially concerning Sphere's resistance, at times reaching the brink of disengagement. A respondent highlighted the gravity of the situation by stating, "there was a point that Sphere was going to completely disengage and tried to shut down the process, disrupting the discussions" (Interview with A17). Validating this fact from the perspective of Sphere, a news article on 29th November 2013 on its website confirmed the tension as follows:

> *"… However, the Sphere Board believes that the various stakeholders have learned from the harmonisation process that combining operational and organisational standards is not easy and might not be desirable, and that looking at complementarity of different approaches is a better way forward. Therefore, the Sphere Board has decided that the*

Sphere Project will discontinue its involvement in the development of CHS and related activities" (Sphere 2013).

The article further explains Sphere's stance on the need for further improvement on collaboration including "open, inclusive and transparent dialogue" (Sphere 2013). The documents linked to the article were no longer accessible, and those directly involved (Sphere Board members) offered no response to my request for interviews.

Board-level conflicts among the boards of the governing bodies illustrate a microcosm of broader sectoral power struggles. These power struggles not only diverted attention from critical discussions on the content and substance of the CHS, particularly around safeguarding measures but also lead to a misallocation of time and resources. The political strife resulting from these conflicts has resulted in protracted debates over governance and control, at the expense of focusing on enhancing the CHS's provisions for safeguarding and SEA prevention. The failure to explicitly address these dynamics within the CHS can be seen as a missed opportunity to foreground safeguarding as a fundamental aspect of accountability.

This power struggle reflects the dynamics seen in the merger between HAO and HAP in 2010, which was the preceding consolidation of standard initiatives before the transition from HAP to CHS. Kennedy, who process-traced the development of HAP, asserts that "various forces competed for control of the HO/HAP institution …the debates were very much on power plays about who should rule and resulted in a battle of positions" (2019: 1403). Kennedy dives deeper into the power tensions between the head office and board members and frictions among HAP's leadership team, similar to the observations made among the CHS Joint Board Committee. This investigation into the power dynamics at play, particularly between the head office and board members, as well as within HAP's leadership, mirrors the tensions observed within the CHS Joint Board Committee.

The similarities between these instances underscore a persistent theme: organizational power dynamics significantly impact collaborative efforts within the aid sector. Despite the absence of these political tensions in official records—a point emphasized by interviewees—their influence at the global level

critically shaped the direction of the consultation process. This influence aligns closely with the assertive direction taken by HAP's executive leadership during its inception in 2003, as noted by Kennedy (2019).

The subsequent analysis explores how such power dynamics were evident in the CHS consultation process, unveiling the mechanisms of invisible power among stakeholders—specifically, who gains access to decision-making platforms and what issues are prioritized on the agenda (Gaventa 2009: 15). This exploration aims to deepen the understanding of how power plays, both visible and invisible, navigate the course of consultations and collaborations within the humanitarian aid sector, highlighting the critical need for a nuanced approach to managing and mitigating power imbalances to foster more effective and inclusive decision-making processes.

4.4.2. Hidden power at play within CHS Technical Advisory and Steering Committees

CHS Technical Advisory and Steering Committees were designed with clear terms of reference to ensure the inclusion of affected populations. These committees were intended to comprise individuals with experience in the development and application of standards within and outside the aid sector, as well as those knowledgeable in organizational structure and humanitarian actions. However, interview data and document reviews suggest a significant discrepancy between this intention and actual practice. The findings reveal a significant dominance of HQ-based individuals in the Global North, many of whom were at senior management level, and the exclusion of accountability advisors who were instrumental in accountability mainstreaming (List of TSG and TAG Members; Interviews with A11, A18). A participant, who, despite not being part of the management team, played a crucial role in enhancing staff capacity for accountability within her organization (Interview with A11), expressed her frustration in my interview that her feedback, along with input from country offices, was overlooked. She highlighted that the consultation process failed to engage beyond the heads of accountability, limiting the diversity and inclusivity of perspectives considered.

> *"The process was very Geneva centric. I was not even invited to this consultation meeting that was hosted at my office where all the heads of other NGOs attended although I was*

the frontline person leading accountability with all our country offices" (Interview with A11).

The quote illustrates how junior staff members, who are often on the frontlines of implementing accountability measures and directly engaging with affected populations, have found their insights and experiences undervalued or overlooked. Feedback from frontline staff on the design of complaint mechanisms within CHS Commitment 4 and 5 would have led to more grounded and effective SEA prevention measures incorporated in indicators.

Similarly, concerns and observations about Western-centric engagements and discussions dominated by headquarters and directors in the Global North with limited representation of national and local NGOs from the Global South were revealed during interviews (Interviews with A17, A11, A18). These organizations are integral to the humanitarian response, possessing deep contextual knowledge and understanding of the communities they serve. Their marginalization from the consultation process not only diminishes the diversity of perspectives considered but also undermines the CHS's goal of fostering a standard that is truly reflective of and responsive to the needs and realities of affected populations across the globe.

This also brings to the forefront of the ongoing debate around colonization within the aid sector. The dominance of Global North perspectives and the marginalization of voices from the Global South reflect historical power imbalances rooted in colonialism. Escobar (1995) critiques the development discourse, arguing that it often perpetuates a colonial mindset by imposing Western values and priorities on the Global South. Similarly, Kapoor (2008) explores the postcolonial critique of development, emphasizing how the historical legacies of colonialism continue to shape global power relations and marginalize non-Western perspectives.

These imbalances are perpetuated when decision-making remains concentrated among a few powerful entities in the Global North, effectively sidelining those from the Global South who possess critical local insights and experiences (de Waal 2020). This mirrors the CHS Consultation Process although CHS Executive Board Committee members (anonymous) stressed the efforts put in to minimize this

tendency. Two interviewees who preferred to remain anonymous also shared reflections that mirror the observation from the JSI Consultation process (refer to Chapter 4.2.3). They both commented on dominance of white senior males with limited number of participants from non-Western countries, highlighting gendered power imbalance of the Global North and the Global South at global level. Another participant (anonymous) described that decision-making of what's actually going into the standard were solely handled by a few powerful individuals within the CHS Writing Group.

Addressing these entrenched disparities requires a conscious effort to decolonize humanitarian practices, ensuring that CHS consultation process and its governance structures are genuinely inclusive and representative. By actively engaging and valuing the contributions of Global South actors, the aid sector can move towards a more equitable and effective system that truly serves the diverse needs of affected populations.

4.5. Analysis of the CHS standard: Hidden assumptions and silences

The following section presents themes, hidden assumptions and silences that lie behind the standard. The 'What's the Problem Represented to be (WPR)' approach is deployed as a mode of thinking (Bacchi 2012). This approach "challenges the assumptions that lie behind policy research and shifts the analytical focus to destabilise the taken-for-granted knowledge involved, and opening up space for new ways of thinking" (Marshall 2013: 56). It also helps to critically interrogate the CHS and examine the way in which issues of accountability and specifically PSEA are addressed in the CHS. Assumptions are primarily made by policymakers and stakeholders involved in the policy formulation process, and thus in this case, those who participated in the CHS Consultation Process in 2014. They influence how problems are defined and addressed within the CHS.

In the process of applying the WPR approach to dig deeper into the way in which the CHS came about, trends emerged as additional insights were shared during the semi-structured interviews with stakeholders who were involved in the CHS Consultation Process. Through analysis of the interviews, I identified implicit themes and the following themes: 1) the stakeholders' recognition of evolution of

accountability; 2) the sectoral debates on framing of affected populations; and 3) the impact of global societal movements on sectoral debates on accountability and safeguarding, reshaping the narrative and policies within the aid sector. While the first theme was repeatedly highlighted across documentation as well as interviews, the two latter themes emerged as the interviewees reflected on the CHS process and argued that the themes were not explicitly discussed during the process in 2014.

The hidden assumption around the inherent goodness of aid workers by the public as well as aid workers themselves has influenced the ways in which accountability was framed and presented by the stakeholders who participated in the Consultation Process. Furthermore, silences also emerged from the interviews as the interviewees claimed 4) the insufficient focus on PSEA debates within the broad humanitarian landscape and 5) a lack of sectoral understanding on the direct linkage between PSEA and complaint mechanisms. The set of themes, assumptions and silences above has influenced how the ideas and language around accountability and PSEA were formulated and expressed in a way it has within the CHS. I argue that whilst evolution of accountability promotes and encourages application of accountability, shifting languages of power imbalance and how we ought to tackle the issue have hindered its emphasis in the consultation. The lack of emphasis on discussions surrounding PSEA, coupled with a limited comprehension of the connection between PSEA and complaint mechanisms, has consequently hindered the development and implementation of effective complaint mechanisms designed to prevent and address SEA.

4.5.1. The evolution and framing of accountability to affected populations

Recognition of accountability evolution

Data from the key informant interviews highlighted the broad recognition within the sector of the evolution of accountability. Interviewees emphasised necessary flexibility to shift focus of the standard from sectoral endorsement at the time of BSO, organisational system establishment at the time of HAP, and then towards the application of organisational policies at the field level at the time of CHS. There is a shared understanding that as accountability debates evolve, the focus of our attention on various aspects of accountability shifts and evolves. Similarly, the shift of focus on complaint mechanisms also

evolves from the policy level of establishing the systems to implementation of the mechanisms at the field level. To illustrate this, this section takes three key critical junctures of accountability initiatives to explain the evolution of accountability (See Figure 10).

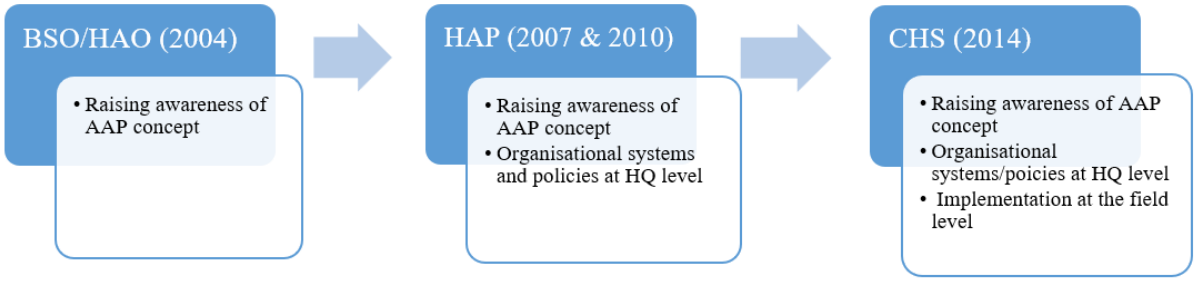


Figure 10. Evolution of humanitarian accountability standards

At the time of the Building Safer Organisation Guidebook (BSO) in 2004, the notion of accountability was described by one interviewee as 'non-existent' (Interview with A20), with many aid organisations opposing ideas on being held accountable despite rising demands for accountability and transparency following major scandals (Interview with A4; see also Chapter 2 section 2.4). NGOs faced with these scandals feared a loss of control, power and authority in humanitarian spaces (Abouassi and Trent 2016) and some expressed unwillingness to develop a series of standards or overarching requirements (Walker et.al 2010). A similar reluctance was shared by four key informants who have engaged in accountability over decades. A former HAP Executive Director (A20) and Monica Blagescu[16], (A4, former HAP Policy Director and former Director of Disaster Emergency Committee) both of whom were instrumental and leading practitioners in progressing the accountability agenda since early 2000, shared their challenges of working with NGOs. They described how some NGOs were initially supportive of the concept of an accountability standard however their initial enthusiasm took years to take hold as a reality. This resonates with Deloffre's findings on "the desire to maintain the autonomy of the sector from outside influence" (Deloffre 2010: 191), reflecting a lack of openness of NGOs to accountability standards.

[16] Monica Blagescu has contributed to the debate and practice on accountability to crisis-affected populations since 2002. This includes lead author of The Global Accountability Framework and Global Accountability Report, Policy Director at HAP International where she commissioned early series of Humanitarian Accountability Report 2008, 2009, 2010 and led The 2010 HAP Standard global consultation, and more recently Director of Programmes and Accountability at the UK Disasters Emergency Committee.

As HAP was established in 2007, the notion of accountability started to be more widely accepted. Deloffre (2016) revealed the overwhelming recognition of the need for accountability as many expressed concerns about "the inherent disorganisation in the humanitarian sector, the allocation of aid based on political preferences and not needs or principles" (Deloffre 2016: 734). The need for organisational systems and policies was highlighted as the main reason for the deficit of accountability to affected populations. Joint Deployment of Joint Standards Initiative (2008) further indicates the focus on establishing systems and processes, and HAP thus centres its attention on organisational systems and procedures. In response, the sector witnessed mushrooming growth in the number of accountability policies and frameworks by individual aid organisations (Humanitarian Practice Network 2011). For instance, CARE International published its first Humanitarian Accountability Framework in 2010 (CARE International 2010). The focus on organisational systems is further signalled in the introduction of specific donor requirements on PSEA. For instance, the US Department of State's Bureau of Population, Refugees and Migration updated its requirements for their implementing partners to incorporate IASC's core principles on PSEA into their key policy, namely staff codes of conduct (USAID 2019).

As HAP underwent revision in 2010, an increasing number of field testing and other engagements took place to proactively amplify the voice of affected populations. HAP Executive Directors (A6 and A20), in their interviews, both emphasized the extensive pilot studies at the field level which fed into the consultation process for HAP revision (Interviews with A17, A6). In her investigation on a rights-based approach through HAP, Jordan (2007) shared findings from HAP's three field deployments and revealed the need for different accountability mechanisms at multiple levels at the sector, organisations, and field. The revised HAP 2010, which incorporated feedback from the three field case studies mentioned above, therefore covers more in-depth aspects of accountability from the perspective of affected populations, including a range of abuse and exploitations.

At the time of CHS consultation in 2014, the broad consensus of systems and policies in place at the organisational level led to the subsequent focus on application of the standard at the field level. Nick Guttman, the former HAP Board Member, CHS TAG Member, and Head of Humanitarian Division at

Christian Aid, reiterated as follows: "we are starting to see how HAP has changed the way in which organisations operate and implement projects and how the program quality is improving. We now need to look at implementation and adaptation of policies at the field level" (Interview with A25). The importance of relevance and contextualisation in applying the standard systematically at the field level was also highlighted (Humanitarian Accountability Report 2013). The CHS PSEAH Handbook Introduction section clearly summarises this trend as follows:

> *"In recent times, the sector has become more aware of the issues of abuse of power within the workplace, as well as in the work we do with affected populations. The humanitarian community has had policies and measures in place for many years that are designed to create safe and productive workplaces which are free of abuse such as bullying, discrimination and sexual harassment. Since 2018, agencies have now been examining and strengthening these policies to implement them effectively at the field level" (CHS PSEAH Handbook 2020: 6).*

This shift of focus from organisational, policy level to application at the field level also challenged a prevailing narrow assumption that once policies are rolled out, then they are implemented automatically and the SEA behaviours would cease (CHS Alliance 2020). As early as 1999, there was recognition and awareness that aid organisations continue to put dominant focus on establishing internal policies and systems (Christoplos 1999). This has resulted in notorious outcome evidenced in scholarships as well as NGO evaluation reports on the disjuncture between policies and the realities of implementation (Mango 2010; Wash 2014; Noor 2015). Action Aid's Risk Management Report for 2011, for instance, admitted that "our rhetoric on accountability has not been matched with actions, which leaves the organisation vulnerable to accusations of not walking the talk" (ActionAid 2011: 4). Instead, aid organisations have developed a tendency to 'talk up' the policy, emphasising more on the stated intentions than the actual practice at the field level (CHS Alliance 2018). A number of respondents, in their interviews for my research, asserted that at the time of Consultation Process 2014, an emphasis was placed on narrowing the extent of the mismatch between policies and practice (Interviews with A7, A25). It was reflected in the second draft of the CHS produced by TAG in April 2014. One of the three pillars (which came to be called 'Commitments' on the final version) – Quality, Effectiveness and

Continuous Learning - dedicated its attention to the connectors that bridge internal policies and implementation on the ground, coupled with learning from implementation (Core Humanitarian Standard 2014p).

At the time of writing in 2021, CHS Alliance's independent commissions study (2020) revealed as follows:

> *"The uptake of the CHS has been steady, but modest, compared to the initial ambitions. More than 150 organisations have signed up as members of the CHSA as of April 2020, with more than 90 having undergone structured verifications" (CHS Alliance 2020: 2).*

The sector is moving towards the critical mass of CHS recognition. The empirical data clearly supports this account, as one of the key informants claimed that "the CHS has now become the norm within the sector" (Interview with A19), with CHS commitments and indicators embedded within NGOs' ways of working. For instance, Disaster Emergency Committee has upgraded their reporting templates incorporating CHS indicators since 2017 (CHS Alliance 2020). This means the 14 leading UK-based international NGOs are now required to apply the CHS across their global programming.

Examining the trends and shift of focus of accountability within the preceding standards as well as the CHS over the last two decades helps us to understand why it is taking a long time to first of all create opportunities to embed the CHS in the organisations to prevent and tackle SEA. Despite its slow progress (Wood 2021), the sector-wide standards in accountability – from BSO, HAP, and now CHS – are generating opportunities to respond to complaints of SEA. Just as it requires flexibility to shift focus within overarching accountability, the shift of focus of complaint mechanisms also evolves from the

policy level of establishing complaint handling policies to implementation of the mechanisms at the field level.

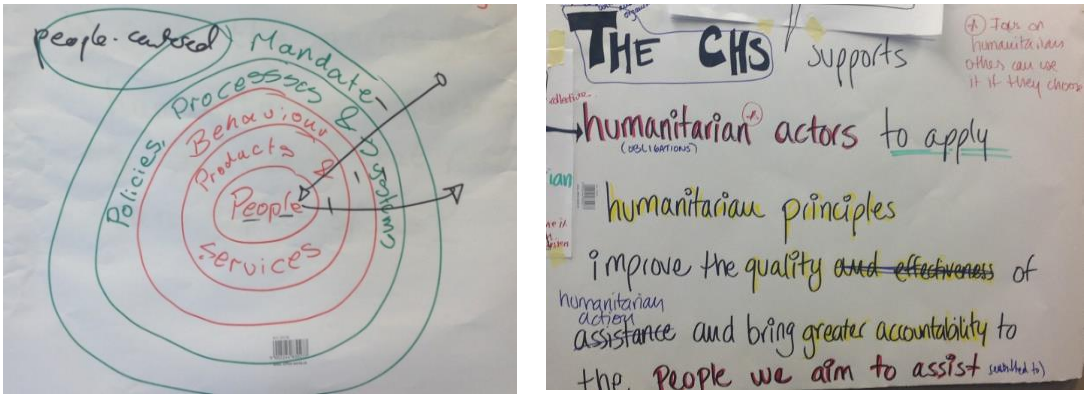


Figure 11. Focus on affected populations during the Consultation meeting

The data from the interviews showed another key trend on the representation and framing of affected populations within the CHS. In unpacking the language of 'affected populations', empirical data revealed unmissable aspiration and evidently clear intention from the stakeholders involved in the CHS Consultation Process to put affected populations at the centre of the standard. No interview ended without emphasis on AAP. This was also evident in multiple document reviews - TAG meeting minutes, consultation report, as well as photos taken at the physical meetings below (See Figure 11).

The reoccurring idea shared by all the TAG members I have spoken to was creating a one-page standard which could be printed and placed on the village hall wall or a tree in communities (Interviews with A1, A7, A25). The same reference was made in CHS TAG Meeting Minutes 29-30 October 2014 (p.10). This mirrors the acknowledgement of the sectoral aspirations on downward accountability to affected populations (Walsh 2014).

This intention is clearly evidenced in the language used within the CHS Commitments. In the CHS, every Commitment begins with 'communities and people affected by crisis'. The terminology is used 54 times across the standard guideline. The repetitive use of the language gives a strong consistent message to the users of the standard to put affected populations at the centre of the standard across aid programming. This is a significant change from the previous standards. This is reflected in Table

4**Error! Reference source not found.** below, which provides a comparison between the HAP benchmark and CHS commitment on complaint mechanisms. Agencies and organisations are markedly the focus of the HAP, whereas CHS places 'communities and people affected by crisis' at the centre. This indicates the sectoral efforts in shifting deep-rooted mentality over time, towards engaging with and listening to affected populations.

Table 4 Change of the terminologies over the preceding standards

HAP 2007	HAP 2010	CHS 2014
The ***agency*** shall establish and implement complaints-handling procedures that are effective, accessible and safe for intended beneficiaries, disaster-affected communities, agency staff, humanitarian partners and other specified bodies.	The ***organisation*** enables the people it aims to assist and other stakeholders to raise complaints and receive a response through an effective, accessible and safe process"	***Communities and people affected by crisis*** have access to safe and responsive mechanisms to handle complaints. Quality Criterion: Complaints are welcomed and addressed.
The ***agency*** shall ask intended beneficiaries and the host community about appropriate ways to handle complaints	The ***organisation*** shall ensure that the people it aims to assist, staff and other stakeholders understand the complaints procedure.	***Communities and people affected by crisis*** are consulted on the a) design, b) implementation, and c) monitoring of complaints handling processes
The ***agency*** shall ensure that intended beneficiaries, affected communities and its staff understand the complaints-handling procedures	The ***organisation*** shall identify and put in place complaints procedures that are based on the preferences of the people it aims to assist, staff and other stakeholders, after consulting them	Complaints are welcomed and accepted and information on how to access the mechanism and its scope is available

In order to represent them in a proactive and empowering manner, the aspiration to put affected populations at the centre was further accompanied by another collective voice, which I elaborate here. Within the wider discussion on the use of language to represent those whom NGOs purport to serve, there has been a prolonged debate on which terminology to employ. Across the semi-structured interviews, the term 'beneficiaries' was debated frequently. Those who engaged with this debate argued that the terminology of 'beneficiaries' offers unintended implication that they are passive recipients of aid and that they are not the principal agents in aid programming (Interviews with A2, A11, A12, A22). The former HAP Executive Director (A20) also stressed that communities affected by crisis are often viewed as the poor and vulnerable who are no longer capable of taking decisions in their best interests

and thus cannot be trusted to do what aid organisations are intended to do in the field. This passive approach echoes findings from Hilhorst et al. (2012). In their exploration of aid workers in Nepal, they revealed how NGOs label beneficiaries as vulnerable, "a label that renders people helpless and deprives them of agency" (2012: 1442). Brabant and Patel (2018) also argued that communities experience a prevailing type of relationship with aid providers in the form of superiority of knowledge on what the affected populations need and what should be offered to them. This perspective in turn reinforces the existing power dynamics and inequalities.

It is evident, from document review across the CHS consultation reports and feedback documents, that the terminology to describe affected populations was debated over multiple TAG meetings and further addressed in the online surveys. One participant in the Straw Poll commented that "the word 'beneficiaries' may cause some confusion in people's minds as to whether 'affected people' is just those served in a project, or if it is those served and not served within a location/situation. It also emphasised power imbalance" (Core Humanitarian Standard 2014d). While a small number of stakeholders recommended terminology such as 'people in vulnerable circumstances' and 'rights-holders' (Core Humanitarian Standard 2014c), the focus remained on ways to represent affected populations in a less hierarchical manner. The evolution of this debate is reflected across the standard development. The terminology of 'beneficiaries' was used 42 times in the Building Safer Organisation Guideline 2004; 51 times in HAP 2007; 7 times in HAP 2010; and none in the CHS.

The definition of 'communities and people affected by crisis' within the CHS guideline also reflects the clear intention to place affected populations as active participants of aid programming regardless of age, gender, and disabilities, leaving no one behind. It is defined as:

> *"The totality of women, men, girls and boys with different needs, vulnerabilities and capacities who are affected by disasters, conflict, poverty or other crises at a specific location" (CHS: 19).*

This deliberate use of terminology, with an emphasis on inclusion, challenges the assumption of monolithic communities, "prescribing one formula for all genders, classes or racialized, ethicised

groups, irrespective of differences, inequalities and tensions between and among these groups" (Kapoor 2004: 126). It addresses socioeconomic, cultural and patriarchal power and leads to positive framing of affected populations. It is reflected clearly within CHS Guidance Notes and Indicators, a supplementary document that offers further guidance on the CHS commitments and indicators and examines practical challenges when applying the CHS (CHS Guidance Notes and Indicators 2015). The Table 5 below, as an example, elaborates on a specific indicator on complaint mechanisms.

Table 5 CHS indicators on complaint mechanisms

5.1 Consult with communities and people affected by crisis on the design, implementation and monitoring of complaints-handling processes.	Disaggregate by sex, age and disability, as these criteria may influence people's views on access and obstacles to complaints mechanisms. Agree on how complaints can be submitted, what may prevent people and staff from complaining, and how they wish to receive the response to complaints. Consider how complaints will be recorded and tracked and how what is learned from them will be incorporated into future planning. Explore joint complaints mechanisms with other agencies, partners and third-party contractors. Train staff on the complaint mechanism.

Source CHS Guidance Notes and Indicators. Page 18.

The four additional guidance notes within Indicator 5.1 offer explicit guidance on the ways in which aid organisations should consult with affected populations through various means, including use of disaggregated data of affected populations and complaint handling processes – i.e. how complaints are submitted, recoded and monitored. With understanding that effective complaint mechanism is critical to address PSEA (Reddick 2010; Niland et.al. 2015), practical and succinct guidance as above on the table - with affected populations at the heart of the standard – seeks to increase the opportunities to prevent and tackle PSEA.

Recent societal movement that spurred actions in the aid sector

Across the interviews, a recurring theme has been the profound impact of recent worldwide social movements, including #MeToo, #AidToo, and Black Lives Matter, as well as the 2018 Haiti Oxfam scandal, on discussions surrounding accountability and the dialogue on sexual exploitation and abuse (SEA) within the aid sector. Prior to 2018, there was a consensus among interviewees that the ethos behind accountability was gradually being understood by the sector, and NGOs and humanitarian

workers had started to grasp the understanding of what it means to be accountable to the affected populations (Interview with A2, A32). This understanding led to the creation of more concrete guidelines for engaging communities and establishing complaint mechanisms across various organizations (Interview with A33).

As the Haiti Oxfam scandal impacted the sector, NGOs were compelled to realise that the price for not demonstrating accountability was becoming higher (Interview with A19). This realization triggered a sector-wide reassessment, with organizations enhancing safeguarding policies and fostering a culture of transparency and ethics to rebuild public trust and donor confidence. In addition, there was a notable shift in attitudes across generations within the sector, with practices previously deemed acceptable by older generations being rejected by the newer generation of aid workers (Interview with A19). Doane (2021) asserts as follows:

> *"The emerging generation of leaders and activists are unprepared to live with the status quo. Concerns are no longer merely whispered in the hallways of INGO offices or Southern CSOs; they are spoken about — even shouted about — almost anywhere civil society exists" (Doane 2021: 1).*

A Humanitarian Quality Assurance Initiative Senior Quality Assurance Advisor also observed the shift of culture from a value-driven ethos-based accountability culture to compliance culture whereby external pressure - to demonstrate the ongoing efforts on PSEA and to repair the reputational damage - surpassed the moral drive of AAP for NGOs to hold themselves accountable to the communities (Interview with A2). This is supported by Goncharenkoab's argument that the social movements and subsequent spotlight of public attention on SEA in the aid sector has "shifted the perception of sexual misconduct as an occasional, but inevitable, sectoral malfunction towards a widening debate over the moral basis of NGO activism and the impacts on the lives of vulnerable NGO beneficiaries" (2021: 1). The scandals continued to raise important questions as to why principled aid organisations behave in unprincipled ways (Prakash 2019). This suggests that "the #MeToo movement shifted public perception about the scale, significance and acceptability of sexual abuse in a way that suddenly meant media

stories on subjects that had largely been ignored when previously covered, were headline news" (HAR 2020: 76).

For NGOs, this shift raises a set of particular concerns. Two directors of international NGOs (A24, A25) admit that whilst they acknowledge the long-standing commitments to AAP, the overall sectoral approach has become more reactive, cyclical and driven by reputational and risk management at the leadership level (Interviews with A24, A25). Another respondent, a consultant independent from management of NGOs, further expressed his concerns that recent external pressures and scrutiny are driving NGOs to dedicate their attention to reputational management, creating passive, reactive culture of defence rather than transparent culture (Interview with A1). The sectoral flagship report, Humanitarian Accountability Report 2020, further reveals that NGOs were more concerned about protecting their organisations than the communities they claim to serve (2020: 73) and needed to be seen to be acting, which resulted in primarily introducing codes of conduct, training programmes, and setting up investigations (72).

This finding with tendency of policy development contradicts Goncharenkoab's claim. He argues that the recent shift of humanitarian landscape has strengthened the "escalated demand to transform approaches to NGO accountability from pragmatic procedures of increased control and demonstrable measures of quality assurance to more reflective methods of intellectual accountability and critical self-assessment" (2021: 1). Based on my interviews and analysis of documentation, I would instead argue that the recent shift in evolution of humanitarian landscape has in fact reversed the fundamental intent of accountability, leading to more compliance, risk management-led control. My claim resonates with Brown et.al (2014) and the Gender and Development Network (2019) who assert that public shaming and reputational risks became powerful motivators, "resulting in an increasingly risk-averse and 'bunkerised' posture by the humanitarian aid community" (2014: 18). It is, however, not evident and thus questionable if prioritisation driven in this way is actually resulting in transformative, meaningful change, in turn contributing to prevention of PSEA at the field level. It then raises a critical question if this approach might have encouraged actions that sound impressive but remain superficial and pay only lip service to the powerful authorities.

As a result of overwhelming pressure for upward accountability, one interviewee suggested that "the concept that was once embedded in progressive thinking has now weaponised the standard like CHS to prove their accountability" (Interview with A20). This claim aligns with Phillips's finding on the sectoral system "that put unduly strong pressures on protection of organisational reputations while encouraging limited transparency" (2019: 1). Thus, the reform that Crack (2013) calls for to strengthen the implementation of dialogic and peer accountability to empower affected populations seems to have become less of the focus for the troubled sector. The former HAP Director (A20) concluded her interview with reflection that "it took me decades of learning to realise that it needs much more than just having standards and adhering to standards. We need to recognise this has to be part of wider cultural change" (Interview with A17).

4.5.2. Hidden assumption: The inherent goodness of aid workers

The semi-structured interviews further highlighted a hidden assumption related to the public and self-perceptions of aid workers. The public as well as aid workers themselves hold an unquestionable presumption that aid workers are inherently good people, who care to help people affected by crisis (Humanitarian Accountability Report 2018; Interview KS, NG, MR). This perception has been taken for granted and has not been challenged. Professor Jon Dean from Sheffield Hallam University described the aid sector in his interview with Parrhesia, a UK-based registered charity whistleblowing think-tank:

> *"The charity sector is meant to be a nice space with full of nice people doing nice things for people who need help…we want to assume the best of the people who are spending money we've donated…it took a larger societal movement of #MeToo to realise that the charity sector isn't perfect and is not living in some sort of heaven above society. When we look more into the sector, we see large elements of abuse being ignored" (YouTube Parrhesia Inc. 2023).*

As such, the widespread and unchallenged belief in the inherent goodness of aid workers has led to a widespread failure neglecting the need for robust regulatory frameworks to oversee and penalize

perpetrators, a concern highlighted in the Humanitarian Accountability Report (2020). This has consequently led to the sectoral failure to recognise and confront the full extent of SEA.

Furthermore, insights from safeguarding experts interviewed for this study corroborate this argument. The safeguarding experts from my interviews have illuminated how this belief creates an environment that not only tolerates but also enables abusive behaviours to thrive, primarily due to organizational failures in tightening regulatory framework and investigating allegations (Interviews with A3, A5, A15). Jo Thomson, an independent safeguarding expert (2021) summarises it explicitly in my interview stating as follows:

> *"In whatever context you are in, if organisations are tolerating SEA behaviours, it gives a wrong message to their staff that SEA behaviours are acceptable, and SEA will flourish within the communities they work in" (Interview with A15).*

This tolerance allows perpetrators, especially males, to rationalize their misconduct as acceptable, exacerbating the challenge of combatting SEA within the sector (Interviews with A5, A15).

This claim is backed up by a wide range of research on SEA within and outside the aid sector. For instance, the International Centre for Research on Women (2018) revealed that organizations with more gender-balanced teams experienced lower rates of sexual harassment. In contrary, environments where men significantly outnumbered women were found to have higher instances of sexual harassment, as highlighted in the findings by Fraser and Muller (2018). This also echoes repetitive findings from the Violence against Women and Girls Helpdesk about organisational culture of some NGOs that "extends their understanding to abusers" (Zenck 2010).

The analysis reveals that while the CHS aims to establish accountability and safeguarding mechanisms, the underlying assumptions about the inherent goodness of aid workers and the organizational cultures that downplay the severity of SEA significantly impact its effectiveness. The evidence from various studies highlighting gender imbalances and lenient approaches towards misconduct within humanitarian organizations suggests that the CHS may not fully address the systemic issues that discourage reporting of SEA.

4.5.3. Silence of power dynamics across global to local levels

The WPR analysis revealed a significant flaw: a lack of focus on power dynamics, crucial for addressing SEA in humanitarian contexts. The inherent power imbalances between NGOs, aid workers, and the vulnerable populations they serve—central to the humanitarian missions—are not sufficiently tackled within the CHS.

Interviews with aid workers underscored the necessity for local NGOs to lead and for accountability to be multidimensional, challenging the existing hierarchy where international bodies dominate. This dynamic is evident across various levels of power, from global to local. A national aid worker in the Global South highlighted these disparities:

> *"Big international NGOs and local NGOs are like masters and slaves. We are often criticized by the UNs and big international NGOs because I say, look we don't need you. We (national, local NGOs) are the leader at the national level. Don't put us in the passenger seats. You have to put us in the drivers' seat. You have to respect my accountability to my people. Accountability should not be one dimensional" (Interview with A13).*

This statement articulates the issue of power disparity between international and local NGOs, emphasizing the need for respect and leadership recognition for local organisations. At the **global level**, international NGOs and UNs often dominate decision-making processes and resource allocation, marginalizing local voices. At the **national level**, local NGOs struggle to assert their leadership and influence policies effectively. At the **local level**, the power dynamics further complicate the relationship between aid providers and the communities they serve, often leading to a lack of genuine accountability and responsiveness to local needs. This critique reflects a broader critique of the aid sector as being top-down, dominated by the Global North, and supply-driven—a critique supported by scholars such as Gingerich and Cohen (2015), Spiegel (2017), and Clarke et al. (2019). These scholars highlight the sector's bureaucratic and patriarchal nature, noting the disproportionate representation of white and Western individuals in senior management roles despite the global expansion of employment within the sector.

Across 34 interview participants, the data showed divergent views on the readiness of the sector for a transformative shift in power dynamics. While some believe in the potential of CHS standards to address organizational and community-level power imbalances (Interviews with A4, A11, A12, A24, A25), others point out the limitations of these standards in challenging broader societal inequalities. For instance, HQAI auditors (A2, A5, A32) in my interviews acknowledge the potential of the CHS to influence and shift power relations between aid workers and communities, they also recognize the limitation in addressing broader societal power imbalances present within these communities.

The evidence from the flipchart below created at the consultation meeting on the 31st April 2014 demonstrates that there was recognition and discussion among participants about the importance and challenges of shifting power dynamics within the aid sector. Comments such as 'the sector is not ready for shifting power and something transformational' reflect the scepticism about the sector's readiness for a fundamental transformation in power relations across all levels.

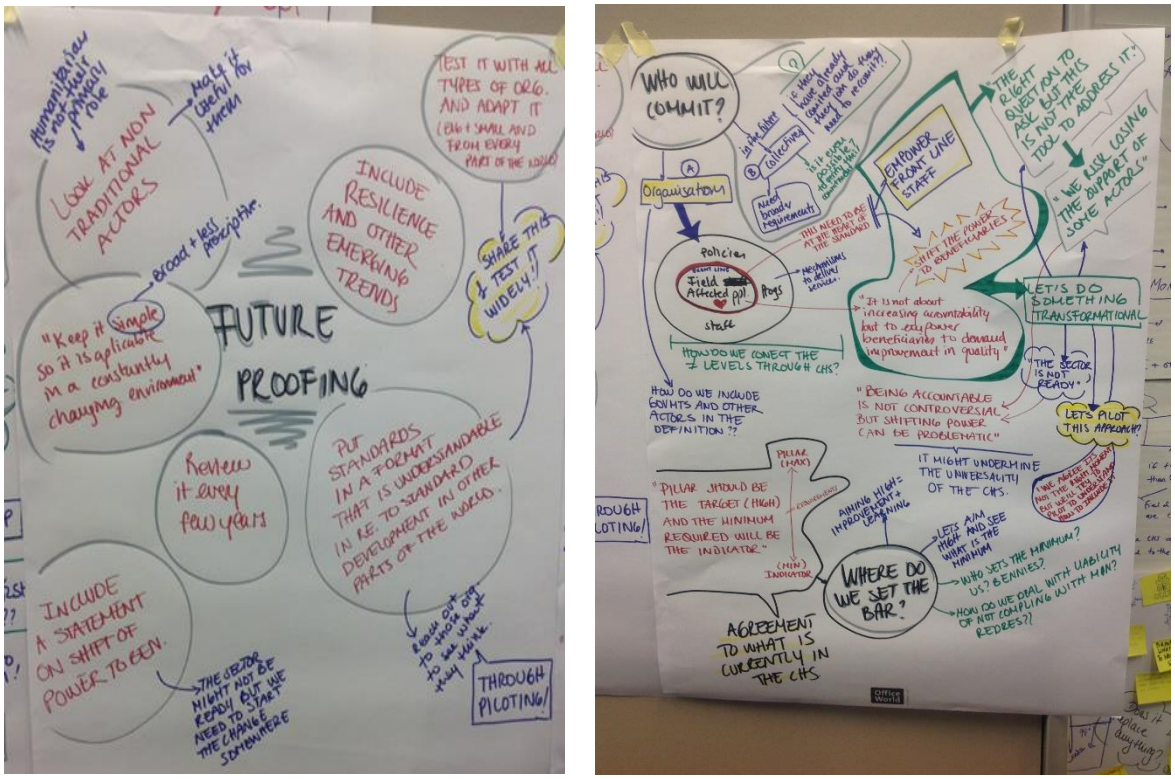


Figure 12. Flipcharts from the Consultation Meeting 31st April 2014

The discussion on shifting power indicates that participants were aware of the existing power imbalances and the need to address them to improve the effectiveness of humanitarian efforts. The statement on the left that "being accountable is not controversial but shifting power can be problematic" reflects a nuanced understanding of the perceived challenges by the participants. Similarly, a remark on the right image calls for the inclusion of a "statement on shift of power to beneficiaries," accompanied by an arrow leading to another comment: "the sector might not be ready but we need to start the change somewhere." This reveals that while there is agreement on the importance of accountability in humanitarian work, shifting power from powerful actors (e.g., international NGOs, donors) to local actors and affected populations is seen as more challenging.

Their conviction is reflected in the CHS itself, with specific indicators addressing power imbalance across the multiple layers – organisational, individual, and community levels. Table 6 below elaborates how CHS aims to influence changes that can contribute to dismantling power structure. However, these indicators are scattered throughout the commitments, lacking a dedicated focus on power imbalance. A HQAI Senior Auditor further commented that although the CHS attempts to shift power through multiple layers across multiple CHS Commitments, doing so takes “a broad level of analysis that none of us has experience or is trained to do systematically” (Interview with A2).

Table 6 CHS indicators on power imbalance

The level in which power imbalance is addressed		CHS Indicators
Power imbalance at organisational policy level	8.7	A code of conduct is in place that establishes, at a minimum, the obligation of staff not to exploit, abuse or otherwise discriminate against people
Power imbalance across different levels	3.6b	Identify and act upon potential or actual unintended negative effects in a timely and systematic manner, in the areas of b) sexual exploitation and abuse by staff
Power imbalance fundamentally embedded in the society	3.6c	Identify and act upon potential or actual unintended negative effects in a timely and systematic manner, in the areas of c) culture, gender and social and political relationships.

Power imbalance at programming level within coverage of NGO staff	5.6	Communities and people affected by crisis are fully aware of the expected behaviour of humanitarian staff, including organisational commitments made on the prevention of SEA
Power imbalance at programming level at intersection of NGO staff and communities	5.4	The complaints-handling processes for communities and people affected by crisis is documented and in place. The process should cover programming, sexual exploitation and abuse, and other abuses of power.

What stood out from the range of interviews (A2, A4, A25, A31, A33) is the clear consensus that the CHS is not intended or equipped to address more complex power imbalances rooted in the broader societal context, including those shaped by cultural and religious norms. These imbalances often involve invisible power as defined by Gaventa's powercube approach, where deep-seated beliefs, values, and social norms subtly shape perceptions and behaviours, reinforcing existing hierarchies and inequalities without being overtly recognized. This form of power perpetuates inequalities by embedding them within cultural and religious frameworks, making them difficult to challenge or change through formal standards alone. There were certainly critical voices from a small number of key informants, which cautioned that the standards are not expected to be the silver bullet that solves everything as Blasgcu (A4) comments as follows:

> *"When it comes to issues around SEA in particular, there are a lot of deep-seated inequalities and power issues that need to be addressed. The CHS can be used as a tool to help you manage risks around PSEA but we need to be aware that CHS is not designed to address deep-rooted issues" (Interview with A4).*

The findings from the SCHR Certification Review Project (People in Aid, HAP & SCHR 2014), shared at the CHS Launch Event in 2014, also indicated that the standards are not to be used as a solution to political or structural issues to address broader power structure. This perspective was reinforced in one of my interviews (Interview with A3), where there was a sense of hopelessness with regards to the limited capacity of NGOs and aid workers to confront societal power imbalance and ongoing abuses and exploitations. This is particularly true in settings where sexual abuse is culturally normalized (HAR

2020: 74), highlighting the challenges in effecting change in deeply ingrained societal issues through humanitarian standards alone.

This situation can be analysed through the lens of invisible power from Gaventa's powercube approach (Chapter 2 Section 2.6.2). Invisible power shapes societal norms and cultural values that perpetuate acceptance of such abuses, making them seem natural or inevitable. This form of power is deeply embedded in the social fabric, influencing people's beliefs and actions unconsciously and reinforcing systemic inequalities. Consequently, addressing these issues requires more than formal standards; it necessitates a fundamental shift in the underlying cultural and social norms that perpetuate these power imbalances.

Despite discussions on power imbalance during the CHS consultation process, the final CHS standard lacks explicit emphasis on shifting power to affected populations. Feedback suggesting the inclusion of language to address power dynamics was not adequately incorporated, leaving a gap in the standard's ability to challenge the status quo or significantly empower affected communities.

Using Gaventa's powercube approach, this oversight can be elaborated through the dimensions of visible, hidden and invisible power.

Forms of Power	Power dynamics during the CHS consultation
Visible Power	The formal structures and processes of the CHS consultation did not sufficiently incorporate mechanisms to redistribute power. The decision-making processes remained controlled by those already in positions of authority, thereby maintaining existing power hierarchies.
Hidden Power	Key issues and perspectives related to power dynamics were likely sidelined during the consultation process. The agenda-setting and prioritization of feedback were influenced by more dominant actors, potentially leading to the exclusion of critical discussions on power shifts.
Invisible Power	Deep-seated norms and beliefs about who holds authority in the humanitarian sector influenced the consultation outcomes. The cultural and ideological assumptions that international organizations are best positioned to lead humanitarian efforts perpetuated a lack of urgency in addressing power imbalances. This form of power operates subtly, shaping attitudes and decisions unconsciously, thus preventing the incorporation of transformative language and measures in the CHS standards.

This oversight complicates efforts to prevent and address SEA, as the CHS does not sufficiently highlight the need for aid workers to be vigilant of inequalities that heighten vulnerabilities to SEA. Without clear guidance on mitigating power imbalances and identifying risks stemming from these dynamics, the effectiveness of complaint mechanisms remains limited, despite the CHS's commitment to such mechanisms. The failure to explicitly address power dynamics leaves the CHS unable to challenge the entrenched power structures that contribute to SEA, thereby limiting its potential impact on creating a more accountable and safer humanitarian environment.

4.5.4. Silences of gendered power imbalance within the CHS

A series of individual interviews with safeguarding experts and 2 members of CHS TAG exposed a sense of disappointment at what they viewed as the inadequate focus on power imbalance in the context of SEA, especially around gender orders and constructs within the CHS. While they are cognizant that the CHS is an overarching humanitarian standard and not a dedicated PSEA standard, all safeguarding experts I've spoken to highlighted the necessity of addressing gender power dynamics as the most critical factor in enabling prevention of SEA (Interviews with A3, A5, A15). Westendorf and Searle (2017) argue that the sexual nature of SEA behaviours and "the fact that they are perpetrated predominantly by men, illustrate the central role gender constructs play in making the SEA a necessary or desirable element of the performance of masculinity" (365).

What makes SEA within the aid sector strikingly more challenging is the nature of opportunistic characteristics due to poverty and material deprivation, facilitating unequal power dynamics between aid workers and affected populations and thus creating "a permissive environment in which transactional sex economies can thrive" (Jennings 2019: 36). Despite widespread acknowledgement of the interlinkage between gender power imbalance and SEA, safeguarding experts agreed that there was "no space for free-flow discussion on gender power during CHS Consultation Process" (Interview with A3).

In the examination of the CHS itself, the only two indicators within the CHS which include specific mention of *gender* are as follows:

- CHS Commitment 3.6 – Programmes identify and act upon potential or actual unintended negative effects in a timely and systematic manner, including in the areas of a) people's safety, security, dignity and rights, b) sexual exploitation and abuse by staff, c) culture, *gender*, social and political relationships, d) livelihoods, e) the local economy, and the environment
- CHS Commitment 4.4 – Communities and people affected by crisis are encouraged to provide feedback on their level of satisfaction with the quality and effectiveness of assistance, paying particular attention to the *gender*, age and diversity of those giving feedback

Indicator 3.6 prompts risk identification around PSEA – including detection, assessment, mitigation and monitoring of risks which could exacerbate existing power dynamics at the project locations. Although the indicator intends to address gender power imbalance, it is often considered to be "the trickiest indicator to understand" (Interviews with A11, A2), as noted by accountability advisors at CHS certified agencies as well as HQAI auditors. Thus, its use of complex language and jargons is likely to hinder the level of understanding by the users and make it harder for the indicator to be translated into practice at the field level.

Furthermore, the Indicator 4.4 triggers attention of users on vulnerable groups (including women and girls) for community engagement and feedback and complaint mechanisms. Its guiding questions in the CHS Verification Framework further express the need for data disaggregation by age and gender. While the two indicators above encompass consideration of gendered power imbalance, there is no indicator within CHS Commitment 5 – Complaint Mechanism which would directly address gendered power imbalance in the context of PSEA to increase confidence of affected populations in accessing safe, confidential complaint mechanisms. As a result, I argue that due to the exclusion of safeguarding and gender expertise in the consultation process, a stronger focus on gendered power imbalance did not emerge. The practical effect of this is that insufficient consideration is given to the way complaint mechanisms address gendered power imbalance in order to prevent and tackle SEA.

4.5.5. Insufficient focus on PSEA debates during the Consultation Process

The findings from interviews further show that debates on the causes of abuse and exploitation and approaches to prevent and tackle the issue were not tailored and specific to SEA at the time of Consultation Process in 2014. Instead, the discussion took place within the broader context of exploitation and abuse as a whole. The sectoral thinking concentrated on how to welcome complaints of *all* types – including PSEA, fraud, and corruption (Interviews with A4, A5, A7, A20). As the concept of accountability was starting to gain traction towards acceptance, the sector (specifically HAP) was advocating for broader understanding of myriad forms of misconduct and abuse that negatively impacted communities, rather than PSEA on its own. The Guide to the HAP Standard explains that "inequality between provider and receiver means that the act of giving is often exercised without the consent of the person in need and relief occurs in a state of virtual judicial impunity" (HAP 2008: 3), devoting no further attention to PSEA.

Absence of emphasis on PSEA is also noticeable in the sectoral flagship report – the Humanitarian Accountability Report (2013). In Chapter One on the Overview of Humanitarian Accountability in 2011, consisting of 40 pages, only two pages were allocated for the section on PSEA. In Chapter 2, PSEA was not earmarked on the list of basic indicators for accountability, together with accountability framework, complaints & response mechanisms, and staff codes of conduct. This, however, may reflect inadequate understanding of abuse and exploitation. Sandvik (2019) points to the lack of a definition and the unwillingness to articulate and enforce robust norms for professional behaviour as the main reason for insufficient focus on PSEA.

The data from the interviews further confirmed that the terminology of safeguarding was not commonly used at the time of the CHS Consultation in 2014. This terminology was seen as UN oriented (Interviews with A6, A14) and only came to be used commonly since the Oxfam Haiti scandal in and the UK's government taking a global leadership role on safeguarding in 2018. Sandvik (2019) reveals that the terminology originated in the UK and asserts that "the UK government and large UK NGOs are the industry leaders institutionalizing the concept through contentious 'safeguarding summits'" (2019: 2).

This impression was corroborated by the UK Collaborative on Development Research (2020). In their report, Balch et. al (2020) state that 'safeguarding' has been seen as a Western notion in relation to legal and policy definitions. This resonates with the empirical data from the interviews, which suggested that the term 'safeguarding' was not understood in a global context (Interview with A5) and remains difficult to translate into other languages (BOND no date). This explains absence of the terminology across the CHS Consultation Process documents, as can be seen in the table below.

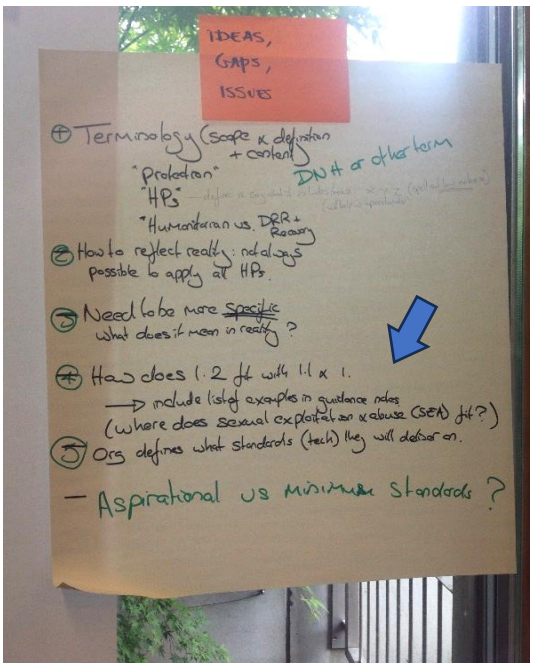
Table 7 How safeguarding and PSEA were discussed

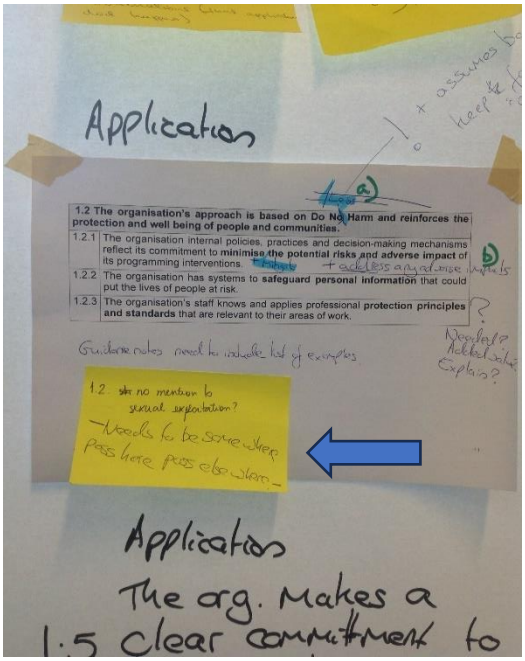
Date	Name of Document	Safeguarding	PSEA
9 Dec 2013	CHS Consultation Process: Compiled Feedback on the CHS Draft of 09 December 2013	No safeguarding mentioned	"Maybe we would need something a bit more specific on PSEA here, unless it is developed somewhere else" Include "prevention of child abuse and exploitation" or "child safeguarding" into "know and comply with staff procedures on Codes of Conduct which PSEA, fraud and corruption and abuse of power"
24 April 2014	Revised Draft for the TAG Workshop Version 1.5 - 24 April 2014	No safeguarding mentioned	No PSEA mentioned
Sep 2014.	CHS Consultation Process: Compiled Feedback on the V2 CHS Draft of 17.06.2014	No safeguarding mentioned	"This is the only place in the standard that PSEA is mentioned. Interestingly it is at the organisational level and not at the operational level. This seems a little light."
29-30 Oct 2014	Meeting report: Core Humanitarian Standard on Quality and Accountability TAG meeting	No safeguarding mentioned	"The key changes that were brought to this final version of the CHS include: Stronger inclusion of PSEA (Commitments 3, 5 and 8)"; "It was felt that PSEA is not getting enough attention throughout the document (as well as in this Commitment) so the TSC needs to check where else it should be included (inclusion in Commitments 3, 5 and 8)". "The issue of where to put PSEA in the Standard was raised (the issue was deferred to and resolved by the TSC who ensured its inclusion in Commitments 3, 5 and 8)".
Oct 2014	CHS Consultation Process: Analysis of Results from Version 3 Straw Poll		Protection against sexual abuse and exploitation is not covered sufficiently. In this standard, it's not expected for organisations to have a protection policy. In addition, the language around complying with Code of Conduct is not sufficient.
Nov 2014	Synthesis of How Straw Poll Comments Were Addressed	No safeguarding mentioned	"We are particularly concerned about the lack of a requirement for a child protection policy or reporting mechanism" (1 mention).

			"The weaker policy and procedural requirement for complaints and staff behaviour in version 2 into commitments and codes of conduct in version 3 is concerning" (1 mention). **"Protection against sexual abuse and exploitation is not covered sufficiently**. In addition, the language around complying with Code of Conduct is not sufficient" (1 mention).

Examining the definition of safeguarding also sheds light on the shift of language from SEA to 'safeguarding'. BOND defines safeguarding as "an umbrella term that covers PSEA, sexual harassment and is increasingly used, in the international humanitarian community, as a broad term that covers all forms of maltreatment or harm where survivors are affected populations and/or other staff members" (BOND no date). The Safeguarding Resource and Support Hub also defines safeguarding as a broad term to include all forms of SEA perpetrated against adults and/or children by or against anyone involved in the delivery or receipt of humanitarian aid (Feather et.al. 2020). This shift of language from SEA to safeguarding with a wider coverage of SEA reflects the growing recognition that "SEA behaviours are not limited purely to affected communities and is a much wider issue involving abuse of power within organisations as well as externally" (HAR 2020: 69).

The triangulation between review of contemporaneous documentation and the semi-structured interviews revealed a consistent concern throughout multiple consultation stages regarding the insufficient coverage of PSEA within the CHS. Stakeholders consistently highlighted this issue, as





demonstrated by the persistent feedback in the PSEA column of the Table 7 above as well as the images of the flipcharts used in the Consultation meeting in April 2020 below.

The initial compilation of feedback, dated December 2013, even raised the question: "Should PSEA be specifically addressed, and if so, how?" Despite the document titled "Synthesis of How Straw Poll Comments Were Addressed 01.11.2014" indicating how PSEA-related comments were addressed in the final version of the standard, referencing an annex, there remains ambiguity regarding whether the consultation process reached a conclusive consensus on addressing PSEA uniformly across the Nine Commitments. The lack of safeguarding experts in the CHS Technical Steering Committee and Advisory Group, evidenced by the list of the committee members, appears to have contributed to the challenge of articulating and addressing PSEA explicitly.

In a broader context, the observed lack of substantive commitment to recognize SEA as a distinct and prioritized topic implies a critical deficiency in addressing this issue comprehensively. Alternatively, if the integration of PSEA across the nine commitments was deemed more effective, there is insufficient evidence to support such approach. Having examined this trend emerging from my interviews and documents, I argue that, just as the UN SEA Policy was developed in isolation from the broader Women, Peace and Security agenda (Westendorf and Searle 2017), the CHS was similarly designed in the absence of PSEA experts from within the sector, hindering the effectiveness of the CHS in preventing and tackling SEA.

Having reflected on the progress since 2014, it is, however, worth noting that remarkable efforts have been undertaken since 2014, including to develop the PSEA Index in 2018 and PSEAH Handbook 2019 (revised in 2020) within the CHS. Produced by CHS Alliance, the CHS PSEAH Index is “an amalgamation of the CHS indicators that specifically relate to PSEAH and include specific PSEAH requirements” (CHS Alliance PSEAH Index 2020: 1). The CHS PSEAH Handbook is a supplementary document that takes key areas from the PSEA Index and provides practical examples with real-life case studies. As stated in the PSEAH Handbook,

> *"Since 2018 agencies have been analysing in more detail the issues of gender, diversity and power imbalance that are the root causes of these abuses of power, including SEA" (CHS PSEAH Handbook 2020: 7).*

CHS Alliance continues to endeavour to pivot greater attention to PSEA and its integration within complaint mechanisms. Developing practical guidelines like the ones above has increased the sector's willingness to enforce and implement robust complaint mechanisms that can encourage a growing number of SEA cases to be both reported and followed up (Interviews with A3, A5, A15, A27, A29).

4.6. Conclusion

This chapter has developed two main arguments. First, examination of the CHS Consultation Process has revealed that while far-reaching coverage of consultation helped ensure that the newly developed CHS represented collective knowledge of aid organisations across the sector, the consultation methodology did not take adequate consideration of power imbalance between stakeholders involved. Second, in spite of its success in addressing pressing issues around accountability that emerged in 2014, the CHS does not sufficiently address the root causes of accountability deficits, with a specific absence of dedicated focus on PSEA. Thus, I suggest that the CHS can maximize the opportunities to respond to complaints of SEA only if power imbalance is more explicitly addressed, and if there is increased specific coverage of PSEA within the CHS.

In conclusion, this section has illustrated how changes in the narrative around power imbalances and the emergence of movements challenging traditional notions of accountability have influenced the representation and operationalization of PSEA and complaint mechanisms within the CHS. This rigidity in the CHS limits its capacity to respond to and integrate new understandings of power imbalances and their relationship to SEA, as evidenced by the transformative influence of movements like #MeToo. The #MeToo movement has particularly challenged the aid sector by undermining the previously unexamined belief in the inherent benevolence of aid workers and NGOs. Analysing these dynamics through Gaventa's powercube approach has further illuminated the ways in which hidden and invisible forms across global, national and local levels have operated within the CHS consultation process.

The subsequent chapters will delve deeper into the practical implications of these limitations by examining a case study of two refugee camps in Sudan. This investigation will present new empirical data on the experiences and perspectives of NGO staff and refugee communities, shedding light on the real-world impacts of the CHS's approach to complaint mechanisms and its effectiveness in addressing SEA on the ground.

Chapter 5. Sexual exploitation and abuse in the Sudanese refugee camps

5.1. Introduction

This chapter speaks to the core of my research, accountability to affected populations (AAP) and the most extreme breach of safeguarding - sexual exploitation and abuse (SEA). The preceding chapters discussed what accountability is, to whom and for what NGOs are accountable within the wider context of aid sector, as well as within the context of SEA. I explored various types of NGO accountability and identified noticeable absence of empirical evidence on effectiveness of complaint mechanisms for preventing and tackling SEA. This has led me to firstly investigate how AAP has been understood and reflected in the development of the most widely adopted standard, the CHS. The first stage of the research exposed hidden core assumptions and silences behind the CHS, revealing that it does not sufficiently address the root causes of accountability deficits, particularly the power imbalance between various stakeholders, with limited coverage of PSEA within the standard itself.

Following the examination of the accountability standard in theory, this chapter addresses the second research sub-question and digs deeper into the practical application of the standard in relation to prevention of SEA. The chapter presents original primary data from the case study on the Um Rakuba Refugee Camp and Tunaydbah Refugee Camp in Gadaref, East Sudan. Based on 57 semi-structured interviews with aid workers, refugees, and safeguarding specialists that took place between February and October 2022, I capture a snapshot of the accountability gaps and identify two key risks and vulnerabilities around SEA particularly for women and girls (section 5.3). Then, based on the empirical data, I explore the multiple types of SEA occurring in the camps and examine the forms of power that influence the nature of SEAs, using Gaventa's powercube approach to support this analysis (section 5.4), as explained in Chapter 2 (see section 2.6). The interviews bring to light not only abuses committed by humanitarian aid workers but also by broader groups of stakeholders, including host communities, police officers, and the army. Chapter 6 then explores accountability mechanisms established by individual aid agencies, evaluating their intersection with one another. It also examines the implications of these inter-agency accountability mechanisms for the ways in which complaint mechanisms are implemented collectively in camp settings.

5.2. SEA risks across the refugee journey

The risks of SEA persist as deeply concerning aspects across the entirety of the refugee journey. As elaborated in Chapter 2, from the initial displacement to the journey itself and eventual settlement in refugee camps, refugees are vulnerable to various forms of exploitation (Olivius 2014; Nordby 2018; Goodman & Mahmood 2019; Pertek et al 2021). Prior to departure from their home country, ongoing civil war in Tigray led to violation of human rights by all parties in the forms of unlawful killings, death threats, torture, ethnic slurs, forced displacements of civilians, and widespread rape against women and girls (African Press Organisation 2021; Amnesty International 2022). A refugee interviewed for this research (C3) recalled as follows:

> "*When Eritrean Soldiers started bombing to our Humera town on the 9th September in 2020 (for) a full day, immediately we decided to move to Sudan the next day on the 10th. Because we need to save our life. At that time the journey was very hard. We travel on foot for 2 hours until we arrive to Hamdayt (refugee transit centre by the border)" (Interview with C3).*

Further interviews indicate devastating realities of physical harms and abuses including sexual violence by soldiers in Tigray and loss of family members (Interviews with C1, C4, C6). Once they commence their journey by road from Tigray to cross the border of Sudan, risks of SEA intensify along the migratory route (Warner 2013; Freedman 2016; Phillimore et al. 2022). One interviewee (B13) commented on numerous incidents of gender-based violence and highlighted the danger of human trafficking across the journey The experiences recounted in the interviews reflected the fact that poor border security creates a permissive environment where armed soldiers roam across borders to commit more violations of human rights (Interviews with B20, B19, B8). Furthermore, security personnel often collaborate with smugglers and traffickers from Egypt, Eritrea, and Libya (Human Rights Watch 2013; Malk 2016; Amnesty International 2022). These are exacerbated by the ongoing Ethiopian civil war. Refugees who I spoke to believe that physical security is better in the camp than in Ethiopia despite the high prevalence of sexual violence and gender-based violence (Interview with B13). One commented:

> *"Safety comes first – it is the basic human rights to be able to live in safety. But they have lost their livelihood and loved ones. Families are broken down" (Interview with B13).*

Another refugee also claimed:

> *"We decided to travel to Sudan not for the sake of politics but to save our vital lives. We had no choice" (Interview with C3).*

Similar accounts have been reported in international media such as Guardian (Davies 2022) and Telegraph (Collins 2022). Amnesty International's report *I don't know if they realised I was a person* (2021) powerfully illustrates the violence faced by those who fled.

For those who fled Ethiopia, violence did not end upon their arrival in the refugee camps. At the beginning of the crisis in the state of acute emergency, refugees fleeing from Ethiopia were allocated to Um Rakuba Refugee Camp regardless of their origin and their political affiliations (UNHCR 2021). Interviewees suggested that placing together civilians from tribes that are in conflict has resulted in violence within the camp itself (Interviews with B16, C2). The secondary data also suggested that this violence included beating, rape, and sexual abuse against refugees (ReliefWeb 2021; The Guardian 2021). A refugee who arrived in the camp on the 3rd December 2019 recalled in my interview as follows:

> *"It's terrible, very very terrible. Physical violence and rape were very common. Refugees from Eritrea – some of them escaped from Eritrean's prison – arrived in the camp. They took Tigray female refugees by force to the back of the mountain by the camp and raped them" (Interview with C2)*

Aid workers (B8, B14, 18) also echoed these reports of the severity of sexual violence. In response to this, UNHCR belatedly acted to address this issue by establishing two separate refugee camps: Um-Rakuba Camp for Tigray populations only and Tunaydba Camp for Eritreans only. This was a critical intervention as the two tribes continued to fight back in their country.

5.3. Vulnerabilities of women and girls in the refugee camps

High vulnerabilities to SEA faced by female refugees and girls have been widely researched and documented by numerous scholars (Walker 1995; Murray 2000; Olivius 2014; Nordby 2018; Goodman & Mahmood 2019). As elaborated in Chapter 2 section 2.5, the context of displacement further exaggerates their vulnerability (Kwiringira et al. 2018; Hilhurst et.al. 2021). The risks of SEA continue

to persist upon their arrival in the camps for female refugees and girls (Langlois et. al. 2016; Pertek et. al. 2022; Interviews with D2, B21, C5). A female refugee who currently works as a community volunteer (C1) shared her fear during our interview:

> *"No, I don't feel safe. So many strangers can hold knives and can harm us. Someone can come in anytime. I'm afraid people will come and steal things from my tent…You see, I used to be a computer engineer student back home. I really hate this place but I have no option. I've seen people being killed in front of us …" (Interview with C1)*

Another male refugee who works at an implementing NGO in the camp also commented:

> *"I keep hearing sad stories here and there, sister. But nobody talks about it to solve anything" (Interview with C6).*

These quotes serve as a stark testament to the profound severity of SEA within the refugee camps. Despite their intended role as sanctuaries offering refuge from the immediate perils of civil war and conflicts, these camps inadvertently engender a distinct set of vulnerabilities, particularly affecting the safety and well-being of women and girls. The interviews demonstrate that women travelling alone, women as single heads of families, children in child-headed households, and orphaned children have the highest vulnerabilities of all (Interviews with B13, B21, C3, C6, D1, D6).

The consequence of pervasive SEA includes a rise in unwanted pregnancies among female refugees, a situation confirmed by aid workers at the camp's protection desks and women's centres. They report a significant number of protection cases tied to unwanted pregnancies and a growing demand for abortion services (Interviews with C1, C9). Despite the lack of detailed records on perpetrators, protection desk managers indicate they encounter approximately 20 to 25 gender-based violence cases daily, including instances of forced pregnancy. This is corroborated by journalism (Jerving 2021) and reports from implementing NGOs like the Sudan Family Planning Association (International Planned Parenthood Federation 2022).

With these insights and based on interview data, the subsequent section investigates two primary factors that elevate the risks and vulnerabilities of SEA for women and girls in the Um Rakuba and Tunaydba

Camps: 1) physical environment and 2) community structures that exclude women and girls from decision making processes.

5.3.1. Neglected spaces: Women's unmet needs in the refugee camp environments

Many refugee camps are established with inadequately serviced facilities that overlook the unique needs of women and girls. This issue has been extensively documented in diverse settings, such as Syrian refugee camps in Jordan (Al Akash & Boswall 2016) and within refugee camps in Uganda (Kwiringira et al 2018). My case study further highlights the ongoing oversight in the planning of communal facilities, like latrines, in Um Rakuba Camp and Tenaydbah Camp, which disregards the safety and welfare of women and girls.

For instance, the absence of adequate lighting in and around latrine facilities increases the risks of SEA for women and girls. Testimonies from female refugees reveal the distressing reality, with incidents of harassment, violence, and invasion of privacy near the latrine:

> *"For a long time, it wasn't safe. There was no lighting around the toilet, and I did not like going to toilet at night because there were men around toilets. Sometimes they were drunk and violent. I used to go around the hill with my friends instead to stay safe. But the walk around the hill also didn't feel so safe too" (Interview with C1).*

Furthermore, the physical violation of the walls of female latrines through holes exacerbates the situation, rendering the facilities unusable without compromising the dignity and privacy of users. As highlighted by Bramucci et al. (2015), such inappropriate misconduct significantly contributes to higher incidents of SEA and increased harm. This is reinforced by the statement of a female refugee participant, who explained in my interview:

> *"Young men make holes on the wall of girls' toilets to see girls naked. It was really bad. So, we used to walk to another block in the camp. Before the toilets were built, we needed to go over the hill in the dark. It was scary at the beginning" (Interview with B10).*

The holes in the walls of female latrines have made it physically impossible to use the facilities without violation of dignity and privacy of the users (Interviews with C1, C4). These observations align with findings from an NGO Vulnerability Analysis (Norwegian Refugee Council Sudan 2021), indicating

that 73% of surveyed refugees in Um Rakuba Camp expressed serious concerns regarding safe and easy access to clean latrines. Interviews with aid workers further validate the frequent cases of sexual exploitation at night, which they attributed to the lack of visibility around the camps (Interview with B7, B20)[17].

Minutes from cluster meetings and interviews with aid workers highlighted a heightened vulnerability of women and girls when using toilets at night. In response, the cluster actively addressed this concern by implementing measures such as installing solar lighting and locks for latrines to enhance the safety of female refugees. Shelter Project Manager from international NGO, drawing on numerous talks with community leaders, consistently emphasized the dangers posed to women and girls by poor lighting. He noted that this was a widespread problem throughout the camp, not limited to the area under his supervision. These conversations led to the decision to install solar lighting near the communal toilets, a measure implemented around seven months after the camp's inception in December 2020. These concerted efforts illustrate the responsiveness of aid agencies to mitigate risks of SEA and prioritize the safety of vulnerable populations. Female refugees commented that they felt their safety had increased (Interview with B2, B5, B10).

Another issue of open defecation within the camps represents a critical challenge that intersects with cultural practices and gender dynamics. During consultation with community leaders on the location of latrines to be built, some groups of refugees refused to have latrines built in their zones. Community leaders, all of whom were males in this circumstance, insisted on their preference for open defecation (B6) in line with traditional norms (B6). This is explained by Beyene et.al. (2015)'s study that indicates that 52.1% of Ethiopian population practice open defecation. Due to this socioeconomic factor attached to their tradition and norms, some refugees asserted that they would not use communal latrines in the camps but instead prefer the outskirts or secluded areas for defecation, as depicted in Figure 13. Images of Um Rakuba Camp, taken by a refugee participant on December below, which illustrates the risky

[17] This aligns with my direct observations in Zaatari Refugee Camp, Jordan (2017-2018) and IDP camps in Port-au-Prince, Haiti (2010 – 2013) as an aid worker myself.

paths women and girls must navigate at night. Consequently, female refugees face heightened risks of SEA during their journeys from their tents to areas outside the camp, especially at night.

An aid worker (B6) corroborated these concerns, acknowledging that "we all know that SEA should not happen, but it happens often particularly when women go outside at night to hidden common areas" (Interview with B6). This echoes the scholarly findings of Hyndman (2000) and Williams et al. (2018) that camps designed for containment introduced new forms of vulnerabilities for women and girls.

Figure 13. Images of Um Rakuba Camp, taken by a refugee participant on December

While the physical environment of refugee camps serves as a crucial factor that shapes vulnerabilities for SEA, it is also important to recognise that these physical challenges are intertwined with broader social factors within the refugee camps. A key social factor includes the community structure in the camps, which perpetuate gender inequalities, as discussed in the next section on decision-making structures within the refugee community.

5.3.2. Exclusionary decision-making structures within the Ethiopian community

Another key factor contributing to high vulnerabilities of women and girls is the community structures that exclude women and girls from decision making within the camps. As scholars demonstrate through their studies (Bender 2021; Griek 2006; Wilde 1998), refugee camps develop their own social and economic community structures, distinct from those of the host states. In the case study camps, refugees have adapted an Ethiopian governance structure which consists of hierarchical levels of leadership called 'Woreda (Amharic: ወረዳ)' and 'Kebele'[18] (See Figure below).

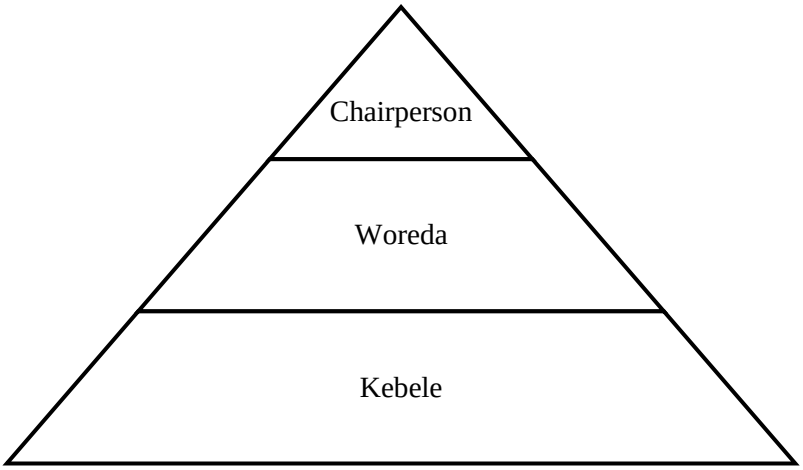


Figure 14. Community structure of the refugee camp, elaborated by the researcher.

The community structure is described by a refugee key informant as follows:

> *"In this camp, we have community leaders for the refugee in each block who are called Kebele, and we have also leaders in the Woreda level which they are leading all the block leaders. The leaders selected the five Development Agents which are the representatives of 33 tents. That means from each Block we have 75 persons representatives. Those 75 representatives make general Assembly then they selected the chair person and other sectors focal person like focal person for security, social affairs, economic affair, women affair, and youth affair etc" (Interview with C2).*

[18] Woreda in Amharic language refers to district tier below the regional level of government, and Kebele means neighbourhood referring to the lowest grassroots administrative unit after the Woreda, recognized by both federal and regional constitutions as lower level of local administration in urban and rural areas in Ethiopia (Bekele & Kjosavik 2016: 1-2)."

Seen as "the mediators or bridges of communication between aid agencies and communities" (Interview with C5), community leaders hold significant authority in this process. One refugee commented on this as follows:

> *"If there is anything, it comes through the community leaders. Everything to do with distribution of aid, security and safety, and hygiene standards. All messages go through community leaders" (Interviews with C2).*

In Um Rakuba Camp, Woreda takes the overall leadership across the camp and consists of 13 male community leaders with no female representation. Under Woreda, Kebele committee consists of a mixture of 76 male and female representatives from each block.

However, according to Bihon et.al. (2019) who examined the rural governance structure in Tigray, Ethiopia, Kebele committee holds limited authority over Woreda, aligning its decisions and actions with the interests of the Woreda committee. This dynamic, as reflected in my case study, underscores the restricted power at the Kebele level, revealing a hidden form of power.

Although the Kebele level is the platform where female refugees engage (Interviews with C3, C4), their influence on aid distribution decision-making is constrained, illustrating the prevalence of hidden power dynamics. A female refugee, appointed as a Kebele community leader four months before the interview, expressed frustration at being excluded from crucial NGO meetings where substantive decisions were made (Interview with C4). Despite her position, this dissatisfaction persisted at the time of the interview in April 2022. Empirical data further confirms the absence of women in the highest Woreda leadership committees (Interviews with C11, C2, C9), indicating a lack of influence from women in their decision-making process.

The prevalence of gender imbalance within community structures of refugee camps across Africa is a systemic issue emphasised by experienced safeguarding consultants (D1, D3, D4, D5) in my interviews. They highlight a significant discrepancy between the intended inclusive representation of these structures and the reality, where vulnerable groups, particularly women, are systematically excluded and marginalized. This situation is not an isolated phenomenon but a widespread characteristic that reveals deeper underlying issues related to gender dynamics within these communities. This validates

Baguma (2020)'s research that reveals that gender discrimination directly portrays and reflects power imbalance "between women and men due to the internalised cultural norms and patriarchal behaviours about women's subordinate role in society" (2020: 33).

Acknowledging this gender imbalance, some NGOs actively attempt to address this issue by making it mandatory to have at least 30% of female representation within the community leaders. A long-standing experienced aid worker who has worked on refugee interventions across Sudan shared in my interview that her NGO set a minimum threshold for female representatives, and that they also hold female-only meetings at women's centres to ensure voices of female populations are heard (Interview with B21). The impact of their contributions is much felt with the decision to implement projects that address specific needs of women, such as the establishment of safe spaces, provision of gender-sensitive protection desks. By prioritizing female representation and engagement, these NGOs are not only addressing the immediate needs of women and girls but are also contributing to the long-term goal of breaking down gender barriers and promoting equality within the camp's governance structures and beyond.

To conclude the section on vulnerabilities, the implications of poor physical environment and inadequate representation of women and girls within the community structure are detrimental in advancing efforts to enhance downward accountability and prevent SEA within the communities. My empirical data has demonstrated that women's insufficient representation leads to a lack of their inputs when planning refugee interventions. This leaves them with no agent to protect them against vulnerabilities and various forms of SEAs. This gender imbalance, therefore, illustrates a deeper structural inequality that affects the well-being and safety of women in refugee camps. Having explored vulnerabilities and risks of women and girls in the context of displacement, the subsequent section presents data on the various forms of SEA identified in my case study research.

5.4. The link between power dynamics of stakeholders and SEA

Accountability mechanisms that exist in the refugee camps are comprised of a diverse range of actors from the host state, UNHCR, and NGOs. This reflects the multi-layered accountability set up discussed in the literature review (see Chapter 2 section 2.5). They interact within a complex web of power relationships that significantly influence the establishment, implementation, and effectiveness of accountability mechanisms, including complaint mechanisms (Peixoto and Fox 2016). The power differentials inherent in these relationships often lead to unequal distribution of influence over decision-making processes and resource allocation (Capjon 2007; Bondokji 2016; McGee 2020). Consequently, vulnerable refugee populations particularly women, girls, and people with disabilities, find themselves marginalized from active participation and meaningful engagement in shaping the mechanisms designed to ensure their welfare. Drawing on Gaventa's powercube approach, this section attempts to analyse empirical data through exploration of visible, hidden, and invisible forms and spaces of power in relation to the accountability mechanisms that exist within this particular context.

In the context of Um Rakuba Camp, the empirical data demonstrates that the power dynamics among stakeholders reveal a complex interplay of authority and exploitation. The host state, represented by the Commissioners of Refugees (COR) in Sudan, and UNHCR hold significant visible power. Both have faced criticism for the way this power is used. COR is accused of allegedly abusing its authority to exploit refugees (Interview with B4, B7, B13, B20). UNHCR, despite its quasi-state role, is criticized for a perceived lack of regular engagement and accountability, with allegations of staff members leveraging their power for sexual favours (Interview with B2, B3, B5, B8, B15). Below this level, NGO aid workers, while supposedly accountable to affected populations, exhibit a stark gap between rhetoric and practice, engaging in exploitative relationships with refugees (Interviews with B16, B21, C7, C9). The unequal power dynamics that leave refugees vulnerable to SEA extend beyond aid workers, with opportunistic host communities contributing to the prevalence of SEA within and beyond the camp. The absence of strict rules and compliance mechanisms facilitates the exploitation of vulnerable refugees by individuals from host communities exercising invisible form of power in the closed space. The section below elaborates on the impact of various power possessed by each actor.

5.4.1. The host states' responsibility and abuse of power

The host states are entrusted with the responsibility of providing a safe haven for refugees and are legally and morally accountable to a diverse array of stakeholders, including NGOs, refugees themselves, and the global community at large (UNHCR 2004; 2010). In the case of Sudan, the Sudanese governmental department for protection of refugees, Commissioners of Refugees (COR) bears the primary responsibility for the protection of refugees. This includes refugee safety, access to asylum procedures, and enjoyment of basic human rights. Together with UNHCR, COR manages a transit centre where refugees are temporarily housed in reception centres for refugee status determination procedures, registration, health and nutrition screening (Refugee Consultation Forum 2022). COR relocate incoming refugees to a long-term settlement of Um Rakuba Camp or Tunaydbah Settlement, where they are provided with life-saving services in accordance with the humanitarian imperative (UN Partner Portal 2021).

A growing field of research (Wilde 1998; Farmer 2006; Pallis 2005; Verdirame 2011) reveals a stark contrast to the prevailing narrative, and empirical findings derived from my interviews also confirm that the host state wields its visible power in ways that exacerbate vulnerabilities of refugees and in turn facilitates an environment conducive to SEA. Four refugees (B4, B7, B13, B20) shared their direct experiences of interacting with COR. For instance, B4 claims:

> *"Some guys from COR are violating women's dignity … When female refugees go to COR to complaint, they always ask them for a favour. They use their power and money for sexual violence … Let's say, for example, when a woman came for complaining about tent, COR manipulate and abuse her some asks for money. This is I think normal in Africa" (Interview with B4).*

Another male refugee who lives with his younger sister and her baby (B13) asserts:

> *"If a member of COR decides to have sex with one woman … he does not give her shelter materials until she sleeps with him. He promises her to come tomorrow, tomorrow, tomorrow … a lot of tomorrow. Finally, the woman become tired and then in order to get a shelter she decides to sleep with him" (Interview with B13).*

These quotes echo findings from other scholarly literature as well as NGO reports (Williams et.al. 2018; Abdullah et.al. 2023). The practices described above are a manifestation of the *visible* power of COR, who exploit their positions of authority and influence to manipulate refugees with less power. Decisions on requests or complaints from refugees about materials necessary for survival are solely made by individual COR staff members with no consultation or participation, making it a *closed* space of power as demonstrated in the figure above. This echoes other scholarly findings such as Farmer (2006)'s study Guinea's refugee camps, which claimed a lack of effective oversight, transparency, and accountability mechanisms of the host states, resulting in abuse of power and incidents of SEA without repercussions or punishments for their actions.

5.4.2. UNHCR's quasi-state role

As the first frontline agency that refugees encounter upon arrival at refugee camps, UNHCR has a quasi-state role, acting in a governmental capacity for camp management but also as a gatekeeper that determines who is entitled to protection (Pallis 2005; Farmers 2006). Despite its clear responsibilities, it was commented by four refugees and six aid workers in the interviews (B9, B2, B6, B10, C1, C3, C4, C8, C9, C12) that they "only see UNHCR staff at the transition centre at the beginning but are never around at the refugee camps. They only visit camps when there is emergency like fire" (B5). The repeated observation from the interviews that UNHCR staff are primarily visible at the transition centre and seemingly absent from the camps unless faced with emergencies, such as fires, highlights a significant gap in regular, proactive engagement with the refugee community.

Furthermore, the testimonials of refugees (B2, B3, B5, B8, B15) indicate a perception of absolute power held by UNHCR staff, a power that seems immune to challenge. For example, five refugees (B2, B3, B5, B8, and B15) alluded to the absolute power UNHCR possesses, which they do not feel they can challenge. When asked about their direct interactions with UNHCR staff at the transition centre, they also shared their lack of confidence and trust in UNHCR's abilities to offer the protection they require. Two aid workers (C1 and C7) also claim that they are aware that UNHCR staff use their power and authority to get sexual favours from refugees and further comment on a lack of functional complaint mechanisms to address this issue. One refugee (C7) gave a disturbing comment as follows:

> *"When my friend approached UNHCR for a permission to move from one camp to another because of ethnic conflicts within the camp, UNHCR staff asks for a favour. If you are a boy, they ask for money. If you are a girl, they ask for sex. They are corrupted" (Interview with C7).*

This validates repeated scholarly findings that UNHCR is not held accountable for failing to protect refugees from harms (Sandvik & Jacobsen 2016). The agency continues to be criticised for absence of sanctions for their misconduct, a concern that has been consistently highlighted in the literature spanning from the early 2000s to more recent studies (Harrell-Bond 2000; Ferris 2007; Grady 2016; Brankamp 2019).

The same issues are found in the case of Um Rakuba Camp and Tunaydbah Settlement. One NGO aid worker (C5) described in the interview a specific situation whereby power of UNHCR was abused by UNCHR staff to take advantage over resource allocation which resulted in exploitations but with no sanctions towards their misconduct. Anam (2020), who theorised the presentation of refugee spaces, contended that "camps are transitional spaces in which refugees are treated as subjects of UNHCR with absolute power, rather than free citizens of that state" (412). This demonstrates that UNHCR holds visible form of power within the closed space, as per the figure above.

5.4.3. NGO aid workers and power: Rhetoric vs. practice discrepancies

NGOs hold significant operational roles in refugee camps and function as frontline agencies to organise and deliver aid distribution (Murray 2000). As illustrated in Chapter 2 section 2.4, NGOs are accountable to affected populations; however, the empirical evidence reveals a significant gap between rhetoric and practice, with striking findings on widespread SEAs committed by NGO aid workers. Refugee participants (C2, C7, C9, C10) frequently identified and commented on nominally consensual yet exploitative relationships between refugees and aid workers – describing them as 'boyfriends and girlfriends'. It is seen as widely accepted and common knowledge among refugees that those refugees who are engaged in a consensual relationship with aid workers as 'boyfriend' or 'girlfriend' greater quantity and/or better quality of aid (Interview with B11, B14).

As Ferris (2007) critically analyses, refugees are controlled by "moneyed elites – UN, aid workers, peacekeepers – whose resources are 10x, 100x, 1000x more than what the refugees have. They can afford to exploit this extreme disparity and pay for sex when they want and with whom they want" (2007: 586). In exploitative relationships, direct cash payments for sex may not always be the norm; instead, aid workers may wield their discretionary power to selectively distribute aid, providing benefits and preferential treatment to those engaged in such relationships. Aid workers essentially exercise discretion, using their hidden power to choose who gets what, in order to channel benefits to those being exploited in return for sex or preferential treatment.

Verbal sexual abuse is another common type of SEA that was disclosed during interviews. Inappropriate conversations such as "you are pretty, I will give you more supplies if you come with me" (Interview with B13) are frequently reported. One national aid worker who visits Tunaybah Camp daily described the situations in my interview as follows:

> *"Some NGO workers like to have chit chat with refugees. Through aid distribution, a relationship sparks between NGO worker and refugees. They start with getting to know each other's names, then catch up over coffee. They hug in the public and flirt with each other, but nobody cares. Then if you see alcohol and woman in provocative outfit in their hands, you know what happens next because of sexual conversations they are having" (Interview with B8).*

Such occurrences are often visible around cafes within the camps. The interviewees made general observations about uncomfortable social interactions and unwelcome remarks made by males on the appearance of female refugees selling tea (Interview with B3, B8, B9, B16, B21). For example, an aid worker described the experience of one female-headed household with two teenaged daughters (Interview with B16). When she was conducting a monitoring visit in the camp, she overheard a conversation whereby the mother asked her daughter to wear a provocative dress and serve coffee at their coffee shop to aid workers and workers subcontracted by NGOs – many of whom are from the host communities. Within a matter of five minutes, males surrounded the coffee shop while making compliments about the outfit of the female refugee. My interviewee, at that time, sensed uneasiness from the girl's facial expressions, but her mother welcomed the male customers by setting up chairs for them next to her daughter. Sexual remarks were made jokingly with laughter, and the aid worker

observed that as the two males finished drinking their coffee, they went inside the refugee's tent with the daughter.

Another example was provided by a second interviewee (B6), this time concerning a 17-year-old female refugee who works as a community incentive volunteer for NGO in the camp. She met an aid worker at the distribution point where she collected non-food items. Subsequently, the aid worker maintained friendly conversations with her whenever they saw each other on the camp. One day, the aid worker visited her tent. It was soon after her father and husband left the camp for work in the morning. The interviewee reported that the refugee felt afraid, and this was exacerbated by pressure from the aid worker to sleep with him in exchange for employment at his agency. As demonstrated above, women refugees are often left with limited materials and financial resources, increasing their vulnerability to exploitations. With no alternatives, they are coerced into "bartering their only remaining possessions: their bodies and their dignity" (Murray 2000: 1015).

The situations described above demonstrate gender roles and vulnerabilities of girls influenced by power at the household level. Female refugees' vulnerability was exacerbated by traditional gender roles and the lack of economic opportunities for women. Girls' sense of coercion and fear highlight the unequal power relations and the exploitative environment they navigate. On one hand, the absence of male family members, who might traditionally be seen as protectors, may leave women and girls more exposed to exploitation within the household. However, men can also pose threats, often exacerbated by the hidden and private nature of these spaces. Consequently, this situation results in heightened gendered vulnerabilities within displacement contexts, such as refugee camps.

These findings and analysis confirm that of the SEA risk assessment conducted within the two camps by Refugee Consultation Forum (2022). The study revealed that 50% of focus group discussion participants (104 out of 208 individuals) had had transactional sex with aid workers in exchange for employment, goods and services (Refugee Consultation Forum et.al. 2022). This is not unique in this refugee camp but is also reflected in many other displacement settings. Researchers report that economic vulnerabilities increased conditions for emergence of 'survival' sex to the extent that parents view their daughters' engagement with transactional sex as inevitable for their family's survival in Haiti

(Bartels 2021), Syria (Simon-Butler & McSherry 2019), Liberia, Sierra Leone, and Guinea (UNHCR & Save the Children 2002).

This is a clear manifestation of abuse of *visible* and *hidden* power of NGO staff over refugees as depicted in the Figure 14 under Chapter 5.4. The desperation of refugees to do anything to meet their basic needs underlines the profound impact of power differentials within these contexts. Aid workers, as revealed in my interviews, acknowledge these power dynamics, with one stating:

> *"We all know that that is the line – there is a line you cannot cross. It is not negotiable, in terms of power dynamics. Aid workers we have power so we need to be responsible" (Interview with B21).*

The issue of SEA committed by aid workers against vulnerable populations highlights a disturbing breach of trust and downward accountability, resulting in a grave violation of ethical principles of NGOs as well as a failure to comply with the CHS. The challenges within refugee camps, however, extend beyond aid workers, as the empirical evidence also sheds light on incidents of SEA within host communities, or SEA committed by host community members in the refugee camps. These camps, often characterized by cramped living conditions and scarce resources, can become breeding grounds for further misconduct by surrounding communities, including SEA.

5.4.4. Opportunistic host community and the neglect of compliance and ethics

Opportunistic host communities significantly contribute to the alarming prevalence of SEA within and beyond refugee camps, and this is reflected in my empirical data. The absence of rigorous rules and compliance mechanisms within the camp creates an environment where unrestricted entry is possible, heightening the risk of exploitation. A refugee participant described in my interview as follows:

> *"SEA perpetrated by the host communities happen often. A lot of times. It can be at the camp or at their village across the camp. The refugee camp is accessible from everywhere so anyone can enter the camp. There is no rule to follow, so nobody is compliant to anything. There is also no culture or understanding on protection…" (Interview with B15).*

Furthermore, the interviews reveal that individuals from host communities, particularly young women, exploit the vulnerable circumstances of refugees as another female refugee commented:

> *"Youngsters from host communities often come in (to the camp) with money, buy food and engage in exploitative relationships and prostitution. You see lots of hugging and hear sexual conversations. It is a comfortable environment to facilitate such behaviours" (Interview with B18).*

The lax environment and the absence of refugee protection contribute to the frequency of such exploitative interactions.

> *"The guys from the host (community) - they come to the camp at night and drink home-made alcohol, make some terrible inside the camp and there are also girls who go with them for secret business" (Interview with C4).*

Moreover, instances of violence and conflict, both within the refugee camps and in the host communities, are recurrent themes in the interviews (B8, B17, B18, C1, C5). Theft is described as commonplace, and the sense of fear among refugees when traversing host communities to purchase food is palpable. Several interviewees express concern about the potential danger and risk of violence and abuse. For instance, a male refugee (C5) voiced his apprehension about his sister's safety when going to the food market run by host communities as he commented as follows:

> *"Yes, it's not very safe particularly around the food market or on the way to the market in the host communities. I often don't feel it's safe for my sister so I often end up going with her" (C5).*

The insights provided by aid workers (Interview with B15, B18) further shed light on the socio-economic factors contributing to this permissive environment. Poverty, coupled with easy access to the refugee camps, fosters an environment where host communities exploit the vulnerability of female refugees, manifesting as an invisible form of power. As expounded in Chapter 2, deeply ingrained in social structures and norms, this invisible form of power influences people's acceptance of the status quo, normalizing violence. The act of being systematically left out from decision-making processes becomes internalized, shaping the perception that it is the inherent and accepted norm (Lukes 2003).

The absence of formal mechanisms to control access to refugee camps and establish norms for interaction significantly contributes to a permissive environment that facilitates exploitation. This situation is further exacerbated by the behaviours of some host community members, who exploit the

more lenient conditions within camps due to the lack of regulatory measures. Such exploitation brings attention to a wider issue of tensions between host communities and refugees, which, as highlighted by a growing body of literature, poses significant challenges to the social cohesion between these two groups (Putnam 2007; Kesler & Bloemraad 2010; Rüegger 2017). Compounding the issue is the host communities' limited awareness and understanding of the necessity for protective measures, thus aggravating the problem.

The described dynamics resonate with similar challenges faced in other refugee camps globally. Research by Aukot (2003) identified conflicts between the Kakuma refugee camp and its host communities in Kenya, arguing that these exposed refugees to higher risks of SEA. Fajth et al. (2019) also documented analogous dynamics between Congolese refugees and their host communities in Rwanda, indicating the pervasive nature of these issues on a global scale. These instances highlight how conflicts between refugees and host communities can significantly increase the vulnerability of refugees to SEA.

5.5. Deeply entrenched cultures of impunity

The analysis of interviews has exposed prevalence of SEA within and surrounding the refugee camps, revealing disturbing situation marked by the complicity of the host states, UNHCR, NGO aid workers, and host communities. The power dynamics inherent in these relationships highlight/illuminate a deeply entrenched culture of impunity, whereby perpetrators act with impunity and are shielded by a systematic lack of accountability. My interviews and review of wider research on the camps and similar settings suggest this is exacerbated by three factors: 1) corruption of law enforcement in the local context of Sudan, 2) culture of alcoholism, and 3) historical roots of the Um Rakuba Camp that resulted in flourishment of the prostitution hub. I discuss each of these in turn below.

5.5.1. The corruption of law enforcement

The legal and law enforcement framework in Sudan emerges as a critical factor contributing to the perpetuation of such abuses. The lack of clarity in the legal system creates a situation where victims

struggle to seek justice. A female refugee (C1) who works as a translator for the implementing NGO in the camp, elaborated on the failure of Sudanese law enforcement as follows:

> *"The legal system is not clear. The community do(es) not know where to go and who can guarantee them justice. So far, when women encounter any kind of violence, I see them confused and struggling to defend themselves legally. Because, when they report to Sudan polices, the perpetrators are not held accountable; rather they are easily released and threaten the victims back again. There is no law to protect refugees, and nobody can punish UNHCR or COR, or anyone with power. The justice system in Sudan is corrupted" (Interview with C1).*

The absence of accountability mechanisms and the perception of a corrupted justice system exacerbate the vulnerability of refugees. Even when incidents are reported to Sudanese authorities, perpetrators, including those from powerful actors like COR, are not held accountable, fostering an environment of impunity (Islam 2006; Equal Rights Trust and Sudanese Organisation for Research and Development 2014). This systemic weakness in enforcement of the legal framework not only fails to protect refugees but also allows those in positions of power to escape consequences for their actions, further deepening the challenges faced by the victims of SEA.

5.5.2. Alcohol use amidst economic and psychosocial desperation

The combination of economic hardship and psychosocial strain intensifies the issue of alcohol use within refugee camps and their adjacent host communities. Empirical evidence reveals a direct correlation between alcohol consumption and increased level of violence within the camps, directly tied to alcohol abuse, creating an environment where female refugees feel particularly vulnerable to SEA. Interviewees attest that this environment makes female refugees feel unsafe when navigating the camps, rendering them particularly vulnerable to SEA (Interviews with B3, B8, B20, C2, C4; Yigzaw et al. 2004; Dibaba et al. 2006).

> *"Whenever there is alcohol, there is often violence, or sexual activities. Nobody will report this because nothing will be done by reporting. We don't really need any mechanisms to pick up SEA cases as it's right in front of you. You can see it when you walk around the camp" (Interview with B8).*

The trade of alcohol between refugees and host communities, driven by limited educational and employment opportunities, further entrenches alcoholism. This unregulated environment sometimes leads individuals to commit theft to support their drinking habits (Interviews with B1, B7, B10, B13). The unique circumstances of displacement, marked by poor livelihoods, a dearth of economic opportunities, and the boredom of days devoid of education and employment, create a potent temptation for an excessive intake of alcohol (Interview with B18). The participant in my interview elaborated his thoughts on this topic as follows:

> *"They (refugees) get bored, they don't have anything to do. Many are also affected by the tragedy from back home. It is sort of their coping mechanism to drink alcohol and numb their feelings" (Interview with B18).*

> *"At the female focus group discussions I had with female refugees, I asked them - do you feel safe? They said no. There is too much alcohol and fighting. They are walking around tents drunk and abusing others. So, my organisation decided to create more vocational training and income generating activities to stop them going to alcohol" (Interview with B20).*

The burgeoning empirical evidence (Weaver & Roberts 2010; Horyniak et al. 2016; McCleary et al. 2016; Makoha 2021) also confirm that exposure to disasters, including civil war and refugee crisis that the key informants in this research have all experienced, can increase the level of alcohol consumed by all groups of refugee communities, particularly high among refugee youth, to cope with pre- and post-migration stress and trauma.

The detrimental impact of reliance on alcohol, manifests in negative consequences that foster an environment where power dynamics are distorted. This situation leaves vulnerable refugees, particularly women, at risk of exploitation. This concerning scenario is linked to the concept of invisible power, deeply ingrained in social culture and norms, operating as presuppositions that often go unchallenged that transactional sex is acceptable. As elaborated in Chapter 2 section 2.6.3 of alcoholism and prostitution, as will be discussed further below, perpetuate inequality by defining what is normal and acceptable, creating a false perceived acceptability in society.

5.5.3. The historical roots: Emergence of hub for transactional sex

The historical roots of the Um Rakuba Camp have played a pivotal role in shaping the current dynamics, particularly regarding the emergence of a well-known and persistent hub for transactional sex in the region. The empirical data reveals that development of prostitution, in other words transactional sex, is linked to the history of Um Rakuba Camp itself. The camp was initially established in response to the famine in 1983 and used to house refugees from Ethiopia between 1983-1985 (Bulcha 1987; Interview with B18). In desperation to flee from the hunger crisis that had caused more than one million deaths and widespread starvation (Vestal 1985), Ethiopians fled to Gadaref and restarted their lives in this location. Acting as a bridge between the two countries, Um Rakuba Camp witnessed the integration of Ethiopians into Sudanese society, with some even acquiring Sudanese citizenship (Interview with B18).

However, alongside this integration, an unofficial 'prostitution spot' emerged, catering to affluent Sudanese men and youth. This development aligns with findings from Bulcha's (1987) research, which highlighted the role of transactional sex and the production of alcoholic drinks as survival strategies for women during the initial refugee response in the 1980s. Bulcha (1987) further examined social and cultural integration for Ethiopian refugees in Sudan at the time of famine. His research illustrated that during the initial refugee response in 1980s, many women resorted to producing and selling alcoholic drinks and to transactional sex for survival. Attached to Um Rakuba Village (the host community), the camp soon became known as an unofficial area for prostitution and has continued to be used for sex work out of public view despite the official closure of that camp in 2000 (B18). This illustrates how new norms and expectations interact with a complex set of past practices that may not easily be shifted.

Fast forward to the current refugee response in 2022, the prostitution business appears to continue to thrive in an ad hoc manner without any regulations (B8). Although not officially reported, observations by aid workers point to a significant amount of cash injecting into prostitution businesses. A senior aid worker (B8) described his routine monitoring visits to the camps. He walked around the camps and conducted random observations of the tents. Among dozens of tents he observed, a couple of tents stood out due to the arrangement of their interior – one bed with abundant alcohols and empty bottles, with

revealing dresses on the floor. The key informant commented that it reminded him of a setup of brothels. Another interviewee described one instance as follows:

> *"There was a group of donors visiting our camp. The police took everyone around the camp and visited one household. There was alcohol, beds, and something else. Nobody said anything. One guy kept that in mind, approached agencies. What was going on in that room? That image has haunted for days and months…When he reached out to the agencies, everyone denied about his suspicion that it was a prostitution. It was catch catch situation" (Interview with B21).*

Other key informants also alluded to similar scenes within the camps, with one asserting that both host states and aid workers are aware of it but choose to turn a blind eye (Interview with B13). In a context with insufficient oversight and neglect of recurrent instances of SEA within and around refugee camps, the question arises as to how refugees, often marginalized and bereft of agency, can be expected to assert their rights and voice their sensitive concerns effectively.

5.5.4. The agency and rights of refugees engaging in transactional sex

When discussing the issue of transactional sex or prostitution by female refugees an important and difficult question arises: do female refugees engage in transactional sex out of necessity or as a social choice? In considering this in my specific research setting, examining the unique structure of the Ethiopian community managing the camp sheds light on the adoption of Ethiopian norms. Empirical evidence confirms the existence of a designated prostitution area within the camp, stemming from the frequent practice of transactional sex. A long-standing national aid worker (B8) vividly describes the exact location at the corner of the camp and further comments:

> *"It's impossible for you not to see. You come and walk around the camp. It's right in front of you – you can see how female refugees conduct themselves and explicitly asking for such interactions" (Interview with B8).*

This phenomenon is likely to be normalised due to the social norm from their home country, Ethiopia. Ethiopia is a country with widespread existence of prostitution (Ni Raghallaigh et. al. 2017; Lalor 2000), underpinned by extreme poverty with entry to prostitution often occurring at a young age. The Ethiopian Ministry of Health (2011) recognises "prostitutes as females who regularly or occasionally trade sex

for money in refugee camps, alongside night clubs, local drink houses, 'shisha' houses, on the street, around military, construction sites, red light districts, and at their homes" (Abebe 2016: 11)[19].

While not all interactions at or around the prostitution spot led to direct cash transaction for sex, ample evidence indicates frequent flirtatious exchanges with individuals possessing financial means, often in exchange for preferential treatment and benefits, as mentioned in section 5.4 where I examined power relations between NGO aid workers and refugees. At the region these refugees fled from in Tigray, Ethiopia, widespread prostitution has been reported (The Guardian 2022) as a means of survival due to extreme poverty. Similarly, at the refugee camps in Gadaref, the dire lack of food and materials, essentially poverty, has compelled refugees to turn to transactional sex.

Normalisation of transactional sex in the name of prostitution within this context reinforces this behaviour and outweigh its negative effects (Yemataw et al. 2011). A national senior aid worker observes as follows:

> *"Women are not reluctant to engage in act of prostitutions. For some women, it's part of their livelihood that brings in income. Do I tell them that this is wrong? Some are feeding their families with the income; some are having their social lives" (Interview with B21).*

Aid workers (B26, B19) who have long observed the circumstance refugees are put in suggest that there is also a need to eliminate activities that force refugees to make money to meet their basic needs and in doing so may force them into transactional sex. One (B26) explained that they believe transactional sex persists because NGOs are not meeting the needs of refugees:

> *"For example, we distribute sorghum that need to be grained. But refugees don't have grinders. They don't have money to grind. To get money, some inevitably put themselves into prostitution" (Interview with B26).*

This example illustrates the practical challenges and unintended consequences of aid delivery practice, falling short to be compliant on CHS Commitment 3.6 to identify and act upon potential or actual intended negative effects. The oversight in the sorghum distribution case reflects a failure to fully

[19] Surratt (2005) explores and identifies 25 types of sex work according to worksite, principal mode of soliciting clients, or sexual practices. These types of work are often grouped under the headings of 'direct' and 'indirect' prostitution, with the latter group less likely to be perceived or to perceive themselves as sex workers.

engage with the needs and capacities of the refugee population, suggesting a broader issue of insufficient accountability. They are then placed in positions where they must seek additional resources outside the aid received. It then exacerbates power imbalance between aid providers and affected populations, increasing their vulnerability to exploitation including SEA. The intersection revealed here between extreme poverty, transactional sex, and the practices of those managing and delivering goods and services in the camps highlights the harsh realities faced by those affected by civil war and trapped in cycles of vulnerabilities[20].

5.6. Conclusion

In conclusion, this chapter has presented a snapshot of accountability gaps in safeguarding and identified risks and vulnerabilities around SEA, particularly for women and girls. It has also begun to illuminate the complex ways in which power dynamics intersect with fragmented accountability mechanisms. The empirical evidence, sourced from aid workers and refugees, reveals the interplay of visible, hidden, and invisible forms of power, creating an environment conducive to various forms of SEA. These SEAs manifest as exploitative relationships, verbal sexual abuse, transactional sex, and forced pregnancy.

Furthermore, the intersection of gendered power dynamics across multiple levels profoundly impacts the lives of women and girls. Gendered power dynamics intersect with broader social and economic structures, heightening the vulnerabilities of women and girls. This intersectionality demonstrates that gendered power is not isolated but deeply interwoven with other systemic structures, leading to compounded disadvantages for women. These dynamics manifest in visible forms of power within formal decision-making processes, where women are often excluded or marginalized, and in hidden biases and cultural norms that perpetuate unequal relations and increase susceptibility to SEA. The interplay of these various power dynamics highlights the complex and multifaceted nature of gender

[20] For more in-depth discussion of prostitution and transactional sex, addressing challenges of terminology as well as their manifestation in different settings, examples can be found from refugee camps in South Africa (Hunter 2002; Kaufman & Stavrouv 2004), Rwanda (Williams et.al. 2012), Malawi (Swidler & Watkins 2007), and India (Mag 2006), and in the ‘Sugar Daddy’ phenomena in urban Kenya (Luke 2005).

inequality, making it essential to address all levels of power to mitigate the risks faced by women and girls.

Furthermore, by addressing invisible forms of power, the analysis reveals deep-seated societal attitudes and institutional practices that marginalize women. These ingrained beliefs and practices further entrench gender inequality and hinder women's access to protection and resources. The hidden power dynamics, such as biases and cultural norms, though less apparent, significantly impact women's lives by maintaining unequal relations and increasing their vulnerability to SEA. This gender-sensitive approach therefore stresses the compounded risks faced by women due to the pervasive and interconnected nature of power dynamics, emphasizing the need to dismantle these entrenched inequalities and promote gender equality.

The empirical evidence presented in this chapter demonstrates the significant deficiency in downward accountability to affected populations and highlights the weight of the consequences of SEA. The revelation of the scale and forms of SEAs committed by host states, UNHCR, aid workers, host communities and among refugee communities demonstrates the multiple power disparities at play and starkly illustrates the consequences of power imbalance and accountability gaps for the affected populations, particularly women and girls.

The combination of corrupt of law enforcement, widespread alcoholism, and the history of Um Rakuba Camp paint a bleak picture, emphasizing the critical need for targeted interventions and systemic reforms to dismantle the structures perpetuating exploitation and safeguard the rights and well-being of vulnerable individuals within and around refugee camps. Taking account of the SEA drivers, types, and groups of perpetrators identified in this chapter, the next chapter will investigate the complaint mechanisms that are intended to precisely address the accountability gaps identified so far. It explores implementation of complaint mechanisms established by individual agencies and analyses how the presence of, or lack of effective complaint mechanisms contributes to the likelihood of SEA cases being reported.

Chapter 6. Complaint mechanisms and power dynamics in refugee camps

6.1. Introduction

> *"Everyone knows that sexual exploitation and abuse (SEA) occurs in humanitarian response – we don't know the scale and frequency, but it happens. We continue to insist on zero tolerance to SEA within the organisations and across the sector but the problem does not seem to resolved. Instead, we are facing increasing number of scandals. How are we minimizing SEA risks to affected populations we serve?" (Anonymous 2019).*

An anonymous participant from the audience reflected during the panel discussion on 'Standard and God Safeguarding Practice' at BOND Safeguarding for Development in 2019. I've continued to hear this kind of sentiment so often for so many years among practitioners. Having examined the framing of accountability of the CHS in theory and unpacked hidden assumptions and silences that lie behind the standard (Chapter 4) and the reality of SEA in the two refugee camps (Chapter 5), this chapter explores accountability and CHS in action. In particular it focuses on the complaint mechanisms that aid providers have designed with an attempt to identify cases of SEA from affected populations. It attempts to answer the enduring question above, which aid workers have continued to asked themselves.

The thesis asserts that complaint mechanisms, positioned as a key commitment within the CHS, have inadequately facilitated the reporting of complaints related to SEA within refugee communities. This chapter endeavours to locate the discussion of complaint mechanisms within the broader discourses on downward accountability and power dynamics. It contends that the CHS, while acknowledging the importance of accountability, has provided limited avenues for refugees to articulate their concerns, and that the ability of complaint mechanisms to maximise such opportunities remains constrained by i) exclusion of vulnerable groups, ii) absence of safe, appropriate spaces for confidential reporting, and iii) failure to put complainants first throughout complaint reporting process.

The chapter draws on new empirical evidence to demonstrate the extent to which five distinct complaint mechanisms utilised in the camps have addressed accountability deficits and power imbalances. The empirical data illuminates the influence of stakeholders in the field wielding diverse forms of power in shaping the design and implementation of complaint mechanisms, as well as refugees' willingness and

ability to access them. The poor design of these mechanisms is further compounded by barriers to reporting (as also discussed in Chapter 5 and below in section 6.2). This chapter further analyses collective nature of complaint mechanisms that acknowledge the gaps of individual mechanisms but seek to minimize gaps by offering the layers of mechanisms that target refugee populations by different vulnerabilities. Finally, this analysis will be accompanied by in-depth inquiry on the role of IASC PSEA Network whole global mandate is to provide inter-agency coordination of all remits of PSEA activities, including complaint mechanisms at country level to deliver accountability at the field level (see Chapter 2 section 2.5.2).

6.2. Complaint mechanisms and how they are shaped by power dynamics

As discussed in Chapter 4, within the CHS, complaint mechanisms occupy the entirety of Commitment 5 "Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints" (Core Humanitarian Standard 2014), with the Standard including four indicators for policy level and three indicators for field level. Reflecting the discussions in my interviews and document analysis[21], the following section identifies complaint mechanisms that are widely utilised at the two refugee camps.

Table 8 Common complaint mechanisms identified at the refugee camps

Stakeholders	Type of complaint mechanisms
NGOs	Complaint boxes
	Hotlines
	Disclosure via community leaders
	Household visits
UNHCR	Office of Internal Oversight Services
Inter-agency	IASC Prevention of Sexual Exploitation and Abuse Network
	IASC Protection Desk

Source: Researcher's elaboration based on document review and interview data

Building on the scarce scholarship on complaint mechanisms (Burall and Neligan 2005; Agymang et. al. 2009; Lattu et al. 2008), this section analyses empirical data using the powercube framework, using

[21] Documents reviewed include but not limited to: The Danish Refugee Council Complaints Mechanisms Handbook 2008; Alight in Sudan Feedback, Complaints and Response Mechanism (F-CRM) Guide and Standard Operating Procedure (2020); Islamic Relief Worldwide Complaint Mechanism Guideline for Field Offices (2018); ACTED Policy against Sexual Exploitation, Abuse, and Harassment (2023); ACTED Policy on Grievances (2018); Norwegian Church Aid Complaints and Response Policy and Procedure for NCA's Programmes; IASC PSEA Network Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (2021).

the two dimensions of spaces (closed, invited, and claimed) and levels (global, national, local, and household). In doing so it intends to bring the debates on complaint mechanism from the margins to the centre. It seeks to offer a pivotal perspective on the potential and the actual impact of complaint mechanisms on the redistribution of power and the enhancement of downward accountability in the two camps.

6.2.1. NGO complaint boxes: Their inaccessibility and exclusion of vulnerable groups

A complaint box is one of the most common mechanisms utilised by aid providers to receive complaints and feedback from affected populations. The images of the camps shared by the interpreter and interview participants based in the camps show big signboards with a small complaint box such as the one shown below (Figure 17). The boxes are located by the office of aid providers in the camps, widely visible from anyone walking past the premise s. At the time of data collection, according to the interpreter, there were 19 signboards counted across Um Rakuba camp with 23 aid providers operating there at that time.

Figure 15 Images of complaint boxes set up by NGOs and UN agencies

Despite the intended purpose of complaint boxes to provide a platform for refugees to voice their concerns, their effectiveness is compromised by a combination of factors. Firstly, the prominently visible location of these boxes undermines the privacy essential for open and candid expression of concerns. The public and visible locations of the boxes may discourage refugees from utilizing this service, as they may be reluctant to be seen accessing these boxes, in case of questions or fear of reprisal from community members and/or perpetrators

Furthermore, the design and placement of these boxes do not fully consider the needs of individuals with disabilities or those who face mobility issues, making it difficult for them to physically access and utilize the complaint box. This lack of inclusivity further reduces the likelihood of refugees, particularly those belonging to vulnerable groups, making use of the complaint boxes as a means to communicate their concerns. The literature review on this topic consistently highlights that the elderly, disabled individuals, and children encounter challenges with the complaint box as a means of voicing their concerns (burger & Owens 2010; Johnson & Kumar 2019). These challenges may stem from physical limitations, cognitive barriers, or communication difficulties that are more prevalent in these demographic groups.

Wider research for instance that conducted by the Women's Refugee Commission (2010) discusses how individuals with disabilities may struggle to access and utilize complaint boxes effectively. Similarly, my interview with a refugee whose sister is disabled, supports this observation by emphasizing the limitations faced by disabled individuals in terms of physical access and the need for alternative communication methods (C8). With 3% of total populations in Um Rakuba Camp and 5% in Tunaydbah Settlement identified as having disabilities, this represents a significant barrier for using the mechanism. Moreover, findings from Save the Children (2020) stress that children, as a vulnerable demographic, encounter difficulties in articulating their complaints through a written format, which is a common feature of complaint boxes. This presents a significant gap in inclusivity, as it hinders the ability of these groups to fully engage with the complaint mechanism.

Furthermore, from the perspective of NGOs, the reporting figures of complaint boxes indicate that they are an ineffective mechanism. For instance, two participants from two different NGOs shared during my interviews that they had received no SEA complaints through complaint boxes – only non-sensitive, operational concerns around aid assistance since establishment of the camps in December 2019. Many aid workers repeatedly said "the box doesn't really work. Nobody uses it" (Interview with C3). Complaint boxes were also referred to by other NGO staff as tick-box exercises required to fulfil requirements for donors (Interview with B18, B7). The limited number of reported general complaints, let alone cases of SEA, suggests potential shortcomings in the design and implementation of complaint boxes. While aid providers aim to foster inclusivity in their formal functions, the current application of

this mechanism, in reality, may unintentionally exclude and undervalue the concerns of refugees with disabilities, children, and those who are illiterate.

This is a manifestation of aid providers exercising their hidden power that reveals who holds power and whose voices are prioritized based on factors such as accessibility and the organization's responsiveness. When a complaint mechanism is not readily accessible to all stakeholders such as disabled refugees or children in the camps, it contributes to the systematic exclusion of marginalized voices, highlighting a discrepancy between rhetoric and practice of downward accountability, and more specifically the proclaimed values of inclusivity and the reality of selective engagement. This design flaw not only undermines the trust in aid providers but also reinforces the barriers that prevent participation and accountability. In conclusion, given these shortcomings in design it is clear that complaint boxes have not helped all affected populations to report SEA cases.

6.2.2. NGO Hotline: Digital divide dilemmas

Alternative complaint mechanisms include hotlines, whose information can be found on 13 signboards across the camps (Figure 16 below). This method not only leverages the ease of mobile technology but also introduces an element of inclusivity by accommodating illiterate adults who can express their concerns effectively through verbal communication. The recognition of diverse communication abilities within the target population is a notable strength of the hotline mechanism. This acknowledgment aligns with the principles of inclusivity and ensures that individuals with varying literacy levels can participate in the complaint reporting process. By providing a platform for verbal communication, the hotline aims to bridge potential gaps in written communication skills, fostering a more inclusive environment for expressing complaints.

Figure 16. Images of a hotline number on the signboard at Tunaybah Camp

Nevertheless, the practical implementation of the hotline reveals a stark contrast. Data from Internews and Insight Strategy Partners (2021) reveal that 34% of refugees utilize phones without internet and only 28% access the internet on a daily basis, indicating a substantial portion of refugees lacking access to mobile phones, a prerequisite for utilizing the hotline service. This limitation is exacerbated by low literacy rates, which further challenge the assumption that hotlines alone can provide a universally accessible complaint mechanism. The stark reality is that a significant segment of the refugee population is inadvertently excluded from this communication channel due to the lack of mobile phone ownership and the broader issue of digital divide.

Moreover, the gender disparity in mobile phone ownership further complicates the accessibility of hotlines. Cultural and social norms, acting as forms of invisible power, influence access to technology and, by extension, the ability to seek help or report abuses. This dynamic is vividly illustrated in the context of refugee camps, where women are disproportionately affected by these barriers. The fear of using hotlines, compounded by concerns over privacy, safety, and misinformation regarding the cost of calls, highlights the multifaceted challenges that prevent women from fully engaging with this complaint mechanism. In addition, the absence of hotline services in local languages represents another critical barrier to accessibility, highlighting the need for culturally and linguistically sensitive communication approaches.

The challenges associated with the hotline mechanism reveal the profound impact of invisible power dynamics, particularly how deeply embedded social norms and cultural factors shape refugees' confidence and willingness to utilize such platforms. The reluctance to report sensitive concerns, including SEA, can be attributed to these underlying factors, which significantly influence refugees' perceptions and behaviours. Gender-sensitive powercube analysis illuminates the ways in which cultural and social norms act as invisible form of power, exacerbating gender disparities in access to technology and hindering women’s ability to seek help or report abuses. Based on these empirical data, it is evident that the hotline, while innovative in its approach to inclusivity, falls short of its promise to serve as an effective tool for upward accountability and the empowerment of affected populations to report SEA cases. This observation aligns with the findings of the Information Ecosystem Assessment

(Internews and Insight Strategy Partner 2021), which revealed that a mere 2% of participating refugees in the two camps (approximately 18 out of 947 refugees) considered hotlines useful.

These challenges not only highlight hindrance to achieving improved downward accountability but also reveal the impact of invisible power—specifically, the influence of deeply embedded social norms and cultural factors. The power dynamics inherent in these norms have played a crucial role in shaping the refugees' confidence levels when it comes to utilizing hotlines. The reluctance and hesitancy observed in reporting SEA cases can be attributed to this underlying invisible power, which affects the refugees' perceptions and behaviours within the context of the available complaint mechanisms.

In conclusion, while hotlines were introduced as a means to foster inclusivity and empower refugees to report SEA cases among other concerns, the reality is that they fall significantly short of this goal, particularly in reaching vulnerable groups within the camps. The multifaceted barriers—ranging from technological access, gender disparities, cultural and linguistic challenges, to concerns over privacy and safety—stress the complexities of implementing effective complaint mechanisms in refugee settings.

6.2.3. Community leaders as intermediaries: Paradox of inclusion?

Leveraging community leaders as intermediaries to report concerns proves effective within localized contexts. A growing body of scholars have validated the crucial roles of community leaders, acting as bridges between aid providers and communities at refugee camps (Affolter et.al. 2002; Griek 2006; Rapholo 2020; Oginni et.al. 2020; Bender 2021). Rooted in pre-existing community structures, these leaders capitalize on established relationships and hierarchies to streamline the reporting process, thereby fostering an environment of trust and familiarity conducive to open communication. This approach not only facilitates the expression of concerns by community members but also aligns with the broader literature emphasizing the importance of community-based approaches in humanitarian settings.

Empirical evidence from Um Rakuba and Tunaydbah Settlements further validates this approach, where regular consultations by ‘apela’ community leaders significantly enhance the articulation of community needs and concerns (UNHCR 2022; Interviews with B5, B10, B20). One aid worker gave an example

of good practice whereby community leaders are provided with basic mobile phones by the organisation to contact the aid worker when a community member approaches them with concerns (Interview with B21). This enabling a direct and culturally sensitive channel for complaint disclosure, relying on application of community dynamics in fostering a responsive and inclusive accountability mechanisms.

This mechanism, while it appears to be encouraging inclusion, in practice can reinforce hidden power structures within the community by determining who has a voice in decision-making processes and whose interests are represented. When complaints are channelled through community leaders, this mechanism can both reflect and reinforce hidden power structures within the community. Community leaders, by virtue of their position, act as gatekeepers of information and concerns. Their pivotal role in mediating between the community and aid providers means that they have the discretion to decide which complaints are voiced and which are suppressed, intentionally or unintentionally (CDAC, OCHA & UNHCR 2021; Interviews with C8). This discretion introduces a layer of hidden power, as it shapes the agenda of issues that are brought to light and those that remain in the shadows. Such a process can intentionally or otherwise prioritize certain concerns over others based on the leaders' perceptions, biases, or interests, thus influencing the decision-making process in a way that may not fully represent the community's diverse needs.

The reliance on community leaders for complaint disclosure inherently relies on pre-existing power dynamics and social hierarchies within the community. These leaders often emerge from or are reinforced by patriarchal structures, where power is traditionally held by a select few, usually male, members of the community. This acknowledges the patriarchal structures that often dominate such settings, where power is traditionally concentrated among men. These settings also include households as such spaces are hidden and private. By recognising the influence of gender dynamics, the analysis highlights how the endorsement of these individuals as the primary channel for voicing complaints reinforces existing hierarchical structures, marginalizing vulnerable groups, especially women. An example of this was provided by interviews with female refugees (C4, C7), who reported that some community leaders were diverting aid, specifically non-food item (NFI) kits, meant for community distribution to their personal networks. This act of exclusion was further investigated by an NGO following a complaint, confirming the misappropriation of aid by community leaders. Such instances

demonstrate that the decision-making authority granted to male community leaders can inadvertently transform into an exercise of hidden power.

The narrative of a refugee mother of three, elected as a community leader yet marginalized from participating in leadership meetings, illustrates the intricate interplay of hidden and invisible power within refugee camp settings. Despite her official status, the systemic exclusion she faces shed light on a broader pattern of gender-based marginalization, deeply embedded in the socio-cultural fabric of these communities. This exclusion is not merely an isolated incident but a reflection of pervasive patriarchal norms that limit women's roles and voices in decision-making processes.

This tendency is embedded in its local culture and social norms. Reiterated by Farmer (2006) who documented SEA in refugee camps in Guinea in 2002 and explored protection challenges faced by female refugees across the world, women in many cultures including in Sudan are accustomed to unfair treatment by male members of the society and are taught to suppress their frustration at their exclusion/marginalisation. Such observations shed light on the ‘nesting’ of invisible power within hidden power as described by Crawford and Andreassen (2015). In practical terms, this invisible power, encompassing norms, values, and attitudes, operates as an unchallenged presupposition and may not overtly manifest as domination (Cornwall & Nyamu-Musembi 2004; Kabeer 2005). Consequently, this nested power dynamic encourages individuals like the refugee mother in our example to internalize discriminatory situations. In conclusion, it is evident that community leaders have not sufficiently facilitated the empowerment of affected populations to report instances of SEA.

6.2.4. NGO household visits: Ensuring safe sparces for reporting

The practice of conducting household visits ensures a direct engagement with refugee populations individually, potentially uncovering concerns that might be overlooked through other approaches. Recognizing that the home environment provides a private and contextualised setting for expressing concerns, this method offers deeper insights into the refugees' daily experiences, cultural contexts, and economic conditions influencing their complaints. This immersive engagement allows for a more comprehensive interpretation of the challenges faced by individuals and families, making the complaint handling process more thorough and understanding. Within Gaventa’s powercube framework,

household visits allow aid workers to directly engage with power dynamics at the household, personal level, offering support and resources that can empower women and shift the balance of power within the home.

Despite the existence of various communication and reporting channels in the refugee camps, refugees overwhelmingly perceive household visits by aid workers as one of the few preferred platforms to report complaints. The aid worker (B20) revealed in my interview that the majority of sensitive concerns are predominantly shared during household visits, as opposed to utilizing other reporting mechanisms. 65% of my key informants who are refugees expressed their preference for household visits, however a lack of frequent visits was also commented on, indicating that they are rare opportunities. Although household visits are a common component of NGOs' monitoring and evaluation activities, the sheer number of beneficiaries and the random sample method employed make it unlikely that the same households will be visited on a regular basis.

Another aid worker, responsible for monitoring and evaluation (M&E) within the implementing NGO, elaborated during their interview on the challenges associated with frequent household visits. Despite his M&E activities incorporating weekly household visits, the extensive coverage of 530 households within the zone allocated to his NGO, coupled with having only one person dedicated to M&E activities, poses a considerable challenge of overstretching resources. This stresses the practical limitations and resource constraints that organizations may face in consistently conducting household visits, despite their acknowledged importance in fostering direct and meaningful engagement with refugee populations.

To validate this perspective, interviews with aid workers at head office in Khartoum further reveal that insufficient resources are allocated for M&E, making it challenging to engage with the communities sufficiently. This resonates with the findings from disaggregation of CHS scores across audited aid providers (CHS Alliance 2022), reflecting the impact of resource constraints on the quality of M&E efforts. It is further corroborated by my own experience of working within the programme department and an under-resourced M&E team. While the capacity for M&E poses significant challenges in terms of the frequency and quality of household visits, it's imperative to recognize the proactive nature of such

engagements. Engaging with refugees on a personal level, household visits embody a potential to shift invisible power dynamics towards transformative power within the claimed space, as conceptualized within the power cube framework (refer to Chapter 2, section 2.5 for an in-depth discussion).

Andreassen and Crawford (2015), who sought to transform invisible power in the context of human rights activism, argued the importance of invisible power in "shaping and precluding citizen voice, participation and action" (2015: 125). They highlight the strategic importance of recognizing and addressing invisible power to foster genuine participation and empowerment. Applying this perspective to the context of Sudanese refugee camps, household visits are strategically utilized to create an 'invited' space, aiming to amplify the voices of refugees. This direct engagement method is instrumental in building trust and rapport between aid workers and community members, laying the foundational stones for an open and receptive environment. Within such an environment, refugees are more inclined to share their concerns, knowing that their voices are heard and valued. For female refugees in particular who are often restricted in expressing their ideas and thoughts, creating a safe space for dialogue helps them to challenge the deeply embedded gender norms that limit their opportunities and rights.

In conclusion, household visits act as a transformative mechanism by directly challenging the invisible power dynamics that silence marginalized voices. Through the creation of safe spaces for dialogue, amplification of marginalized voices, building of trust, identification of underlying issues, and empowerment of individuals, these visits contribute to a shift towards more inclusive and participatory power relations within refugee camps.

6.2.5. UNHCR complaint mechanism: Limited engagement and unresponsiveness

Aside from complaint mechanisms established by individual NGOs, UNHCR also provides platforms to enable refugee populations to voice their concerns, even those of a sensitive nature such as SEAs. As elaborated in Chapter 2, UNHCR in theory acts in a government capacity for camp management as a key actor in refugee interventions and manages three accountability mechanisms, namely the Office of Internal Oversight Services, the Inspector General's Office for the UNHCR, and the Evaluation and Policy Unit. Notably, the Office of Internal Oversight Services stands out as the sole mechanism directly addressing ground-level complaints. This section presents data on refugees' and aid workers'

engagements with UNHCR's Office of Internal Oversight Services as they emerged from the interviews.

While aid workers across various NGOs exhibit awareness of these mechanisms, only two out of the 31 interviewed aid workers have actual experience utilizing the channels to report concerns, with one case pertaining to SEA and another concerning operational matters. Both participants conveyed a prevailing lack of confidence in the UNHCR complaint mechanism as they have received no response from logging the complaints. This raises concerns about the responsiveness and effectiveness of the UNHCR's complaint handling process.

The failings of this mechanism become more noticeable when we consider the disclosure of a historical SEA case which was made during my interview with an aid worker, who must remain anonymous in this thesis. The case involved the suicide of a female refugee, a tragic outcome of repeated SEA perpetrated by an army soldier at the outset of the Ethiopian civil war in late 2020. While this disclosure initially raised a red flag for me in line with my ethical commitments, leading me to seek advice and consider reporting the incident on behalf of my participant, my subsequent follow-up interview with this refugee indicated that this case had already been reported to UNCHR at the time of the incident, seventeen months before the interview.

Moreover, refugees' perceptions of UNHCR's presence and engagement within the camps reveal a broader issue of accessibility and visibility. Many refugees expressed dissatisfaction with limited engagement, noting that UNHCR staff are visible and present only at entry points during refugee determinations. Once in more permanent camps, engagements with UNHCR diminish, leaving refugees feeling overlooked and underserved. Many expressed their dissatisfaction against UNHCR due to their limited engagement as one participant commented:

> *"They are not based in the camp. They administer refugees at the transit centre. They (UNHCR staff) only come and show their faces when big donors come and visit. So, I think the problem is because there is only COR for all the refugees' complaints. I think here is the gap. We only see UNHCR staff when there is storm and if it caused damage to the tents" (Interview with C5).*

The limited engagement and visibility of UNHCR staff within the camps, as reported by refugees, illustrate a 'closed' space where opportunities for meaningful interaction and dialogue are scarce. The existence of a complaint hotline, albeit unknown to many refugees, represents an 'invited' space, theoretically designed to enable communication. Furthermore, the operational challenges at the local level, including the lack of responsiveness and actionable feedback following complaints, highlight a disconnect between policy intentions and ground realities.

The existence of a dedicated complaint hotline for Gedaref State (UNHCR Help Sudan no date), while potentially a valuable resource, is considered ineffective by the lack of awareness among refugees. This communication gap not only limits the accessibility of the complaint mechanism but also reflects a broader failure in outreach and information dissemination efforts by UNHCR. In conclusion, the challenges faced by the UNHCR complaint mechanism—ranging from a lack of responsiveness and feedback to issues of visibility, engagement, and communication—highlight the need for a more robust, transparent, and accessible approach to complaint management.

In the analysis of individual complaint mechanisms within humanitarian settings, the following discussion of the Inter-Agency Standing Committee (IASC) Protection from Sexual Exploitation and Abuse (PSEA) Network holds critical importance, even if it did not prominently feature in interview data. This significance is multifaceted, rooted in the Network's foundational role in establishing norms and standards for preventing and responding to SEA across the humanitarian sector at the global level. The Network plays a pivotal role in setting sector-wide standards, fostering inter-agency coordination, and bridging the gap between global policy formulation and local implementation.

6.2.6. Localising global SEA accountability: Challenges of the IASC PSEA Network

The challenges of individual complaint mechanisms within displacement contexts where multiple aid providers operate bring out necessity to establish inter-agency coordination body – such as the Inter-Agency Standing Committee (IASC) PSEA Network - to address the challenges revealed in the above section. Despite the limited visibility of the IASC PSEA Network in my interviews, the Network's role

is indispensable in shaping global norms and standards for countering SEA within the humanitarian sector. The IASC PSEA Network's contributions are critical for establishing sector-wide standards, enhancing inter-agency collaboration, and facilitating the transition from global policy formulation to localized implementation practices.

With a global mandate to provide inter-agency coordination and technical support at country level to deliver accountability and prevent SEA at the field level (see Chapter 2 section 2.5.2), IASC PSEA Network holds a position of institutional influence in the global, national, and local spheres. The empirical evidence however indicates its absence at the camp level, revealing a significant gap in the collective prevention and response to SEA. Although aid workers acknowledge the Network's organized meetings and training sessions, interviews reveal a lack of substantial engagement with the inter-agency complaint mechanism (Interview B9, B16, B29).

Figure 17. Images of PSEA flyer created by Sudan PSEA Network

This discrepancy raises critical concerns about the mechanism's reach and the specific obstacles impeding its effectiveness. Despite its global mandate for inter-agency coordination and technical support at the country level, the IASC PSEA Network faces challenges in exerting its institutional influence during crises, such as the initial phase of the 2020 Ethiopia refugee situation. This is supported by empirical evidence, including interviews and document reviews[22], which indicate a focus on policy

[22] The documents reviewed include those shared by the interview participants who attended IASC PSEA Network meetings including meeting minutes, the inter-agency PSEA Standard Operating Procedures. The publicly available documents on the IASC PSEA Network website validates the progress indicated in the interviews.

and training but limited practical engagement at the grassroots level. For instance, on the IASC PSEA Network Sudan page, the country dashboard highlights key achievements including PSEA and investigation training and development of inter-agency PSEA Standard Operating Procedures. Their policy work also extends to conducting PSEA training for aid workers, accompanied by the dissemination of the PSEA poster, as depicted in Figure 17. This image was taken by a refugee participant who works at the implementing NGO at his office base in the camp. The IASC PSEA Network coordinator, based in Khartoum, was also actively involved in delivering PSEA training to NGO aid workers in Gedaref, a short distance from the case study refugee camps.

Operational difficulties at both the country and local levels, compounded by the high turnover rate of frontline aid providers, significantly undermine the Network's effectiveness. This situation is exacerbated in challenging environments like East Sudan, where the transient nature of the workforce hinders the establishment of trust with communities—a crucial element for encouraging SEA reporting. In words of IASC PSEA Sudan Network Coordinator,

> *"We have bigger challenges at the country level of securing sufficient resources for PSEA network and local challenges of capacity of frontline aid providers due to high turnover rate of staff" (Interview with B17).*

This echoes comments from my other interviewees. One (B13) who completed her deployment mission and was in another country at the time of interview, shared the challenges she faced when working in Gedaref as a regional manager. She described these as follows:

> *"I have worked across Sudan but east Sudan is a tough place to work. There is such high staff turnover rate – people work for three to six months, and they move to another mission. Continuity is not there. I'm like that too. By the time people have come to trust me, it was time for me to move to another mission. So, the continuity of trust isn't there for the communities" (Interview with B13).*

Her quote highlights the ongoing challenge of building trust with communities to encourage SEA reporting. Numerous literatures highlight a lack of trust and confidence that hinders complainants to come forward (Gelb 2007; Ullman 2010; Safeguarding Resource and Support Hub 2022).

Moreover, the reliance on individuals for the successful implementation of safeguarding measures, as observed by independent safeguarding experts, points to a systemic issue. The secondary resources such as the review report by CDAC, OCHA and UNHCR (2021) also indicate no common approach for collecting complaints at inter-sectoral level in the refugee camps. Moira Reddick (D1), an independent safeguarding expert who conducts regular review of safeguarding on behalf of IASC PSEA Network, asserts that

> *"It comes down to naming individuals who are stationed at the project location for a period of time. They made it happen. But this trust goes away once they move on…My observation over many years is that when something is working, there is a committed individual. It's not the system or institution. It comes down to individuals" (Interview with D1).*

The effectiveness of complaint mechanisms often hinges on the presence and commitment of specific individuals, rather than the robustness of the system or institution itself. This dynamic leads to inconsistencies and confusion at the camp level regarding how complaints are reported and managed, diminishing the IASC PSEA Network's potential to harness its influence for streamlining and harmonizing complaint mechanisms. This lack of coordination results in missed opportunities for the IASC PSEA Network to leverage its intended power and influence.

As elaborated in Chapter 2, IASC Network is the highest-level and longest-standing humanitarian coordination forum of the UN system, with influential authority at the global level. Its potential to streamline and harmonize complaint mechanisms across agencies remains unrealized, contributing to a fragmented approach that hinders effective safeguarding efforts on the ground. Davoren (2012), who explored inter-agency complaint handling in Haiti, argued that different complaint mechanisms implemented by various NGOs have confused affected populations, leading to distrust of aid providers without inter-agency coordination. In conclusion, IASC PSEA Network has failed to 'claim' space to leverage its intended power and has not helped affected populations to report SEA cases.

6.2.7. Innovative – but rare – complaint mechanisms: What can we learn?

Within Um Rakuba Camp and Tunaydbah Camp, aid providers have developed other ad-hoc types of complaint mechanisms which are not systematically used across all aid providers but innovative. They

include learning survey, feedback mechanism, child friendly centre, SaferCall, referral, small platform – desk agents who can reply in different languages, clinics, and client centred approach.

Among these, child-friendly spaces stand out for its capacity to tackle the invisible and hidden forms of power by creating a safe, supportive environment tailored to be welcoming and accessible for children. This initiative helps to overcome the barriers that prevent children from engaging with traditional complaint mechanisms (Save the Children 2012; UNOCHA & Inter-Agency Coordination Lebanon 2023; Brown 2013; Werner et.al. 2021). It acknowledges the need to adapt physical and interpersonal spaces to ensure children's voices are heard and their rights are protected[23].

A programme manager (B31), in my interview, highlighted the situation faced by a group of female adolescents in the camp, who were left without activities due to barriers to higher education and employment. In response, her NGO initiated a gender-based violence campaign, incorporating various areas of activities. These activities encompassed awareness raising focused on adolescent sexual and reproductive health, environmental workshops through tree planting initiatives around the camp, and the establishment of a child-friendly space attached to recreational activities, including knitting which was requested by adolescents themselves. The aid worker praised this type of activities that empowered the adolescents to decide their activities, creating an environment that is conducive to openly share ideas as well as concerns. Through this series of activities, sensitive concerns such as SEA were reported, indicating effective mechanisms in place within the context of refugee camps.

This finding was corroborated by research focusing on the reporting mechanisms for violence against children in Tanzanian refugee camps (Fletcher et al. 2022). The study discovered that both children and their parents were more inclined to report incidents of sexual violence at specifically designed child-friendly spaces, compared to other areas within the camps. Other NGO reports reinforce these findings. UNICEF's evaluation on child protection programmes (2019) also echoed and stresses the significance of creating safe, structured environment to facilitate the reporting of sexual violence among displaced

[23] However, it must be noted that a significant body of scholarship continues to highlight the specific difficulties encountered by children in refugee camps when attempting to use reporting mechanisms. This indicates a pervasive issue where numerous concerns expressed by children remain unresolved (Williams et al., 2018; Binagwaho, 2012; Iyakaremye & Mukagatare, 2016).

populations while Save the Children (2020) further offers additional evidence on the effectiveness of child-friendly spaces using digital tools.

Together, these localized, ad-hoc approaches highlight the critical importance of listening, prompt actions and response, and nuanced understanding of power dynamics at play to ensure the voices of those most at risk are heard and acted upon effectively.

6.2.8. A rare outlier: Bottom-up practice of IASC Protection Desks

Returning to my central research question – to what extent have complaint mechanisms helped affected populations to report complaints on SEA, the above section illustrated a mixed effectiveness in these mechanisms, with some failing to significantly enhance downward accountability to address SEA, while others prove marginally more effective. Notably, a distinct outlier in this complex matrix is the bottom-up practice of IASC Protection Desks. Implemented at the inter-agency level, protection activities encompass a wide range of interventions aimed at safeguarding the safety and well-being of refugee communities, particularly those most vulnerable or at risk (UNHCR 2009). Although these activities fall outside the direct scope of complaint mechanisms, they inadvertently provide critical entry points for lodging protection concerns, including SEA. As stated in UN Partner Portal,

> *"The protection sector prioritises community-based approaches that prioritize identification of protection risks through proactive protection monitoring at individual and community levels; empowers, strengthen community capacity, and enhance community participation to build resilience and promote a violence free environment" (UN Partner Portal 2022: 1).*

The main protection activities take place at protection desks, women's centres, and psychosocial support centre. They serve as designated spaces for individuals to report a wide spectrum of protection issues within the community and are designed to prevent and respond to various forms of harm. Among the wide spectrum, safeguarding is a specific subset of protection narrowly focused on concerns of SEA (IASC PSEA Network).

Since the beginning of refugee crisis in 2020, many refugees have arrived at the camps after having experienced traumatic journeys from Ethiopia. As elaborated in Chapter 2, ongoing violation of human

rights in the forms of torture, ethnic slurs, forced displacement and sexual violence in Tigray have put refugees, particularly women and girls, most at risk at suffering from protection issues. As identified by UNHCR Country Refugee Response Plan 2022, protection has been categorised as one of the top priority of interventions at refugee camps in East Sudan since 2022, and the role of protection lead agencies has been assigned to Danish Refugee Council, Plan, International Rescue Committee, and Alight to coordinate inter-agency response to the overwhelming needs and leverage capacities on protection.

Table 9 Infrastructure of Protection Service Points as of March 2022

Protection service points	Um Rakuba Camp	Tunaydbah Settlement
Registration centre	1	1
Protection desk	3	9
Women centre	4	7
Child friendly space	4	5
Psychosocial support centre	1	1
Ethiopian orthodox churches	2	2
Milling point	2	2
Mosque	1	1
Community safe places	5	8
Total	22	

Source: UNHCR Ethiopia Emergency Situation Update (2022a; 2022b)

For instance, according to UNHCR (Table 9 above), Um Rakuba Camp alone has total of 22 protection service points, providing psychological services, counselling, health, and legal services, as well as rape kit and dignity kits (UNHCR 2022)[24]. At one protection desk, according to my interview, approximately 20-25 cases were filed daily (Interview with B5). A refugee participant who works at one of women centres managed by NGO shared as follows:

> *"People report concerns like gender-based violence, sexual abuse of women at risk, elderly who have nobody to take care of her, single mothers with no man supporting the families.*

[24] According to UNHCR (2022), protection sector has the highest number of programmes implemented at the refugee camps in Gedaref across all the sectors. For instance, Um Rakuba Camp alone has total of 22 protection service points. In the period of five working days from the 1st to the 6th January 2022, UNFPA and NCA served 442 women, 363 girls, and 79 men and boys in Tunaydbah and Um Rakuba camps (UNHCR and Refugee Consultation Forum. 2022). In March 2022, 392 refugees (130 men and 262 women) were provided with targeted assistance and referrals through the protection desks (Ethiopia Situation Operational Update #12/2022 1 – 31 May 2022).

> *The protection desks give appropriate support even things like responding to request for a separate shelter for women who experienced domestic violence and violence with neighbours" (Interview with C7).*

A regional manager of an NGO (Interview with B21) elaborated in my interview that protection support further includes provision of psychosocial support, counselling, and health support. It also offers support to relocate victims to safe houses to protect them from further harm from perpetrators. Safe houses are funded by UNHCR and run by Norwegian Refugee Council and Norwegian Church Aid. IASC Protection Cluster (2022) also added provision of legal assistance, dignity kits, and counselling for mental health, and they are supported and managed by social workers. The inter-agency coordination on protection also appears to be clear as a local aid worker in my interview described as follows:

> *"As far as I know, usually people go to organizations; and they refer you to protection desks. Or they may report to the community leaders. After this, the NGO with the protection desk or the community leaders will go to the police or to UNHCR for the legal proceedings" (Interview with C1).*

This comprehensive protection support illustrates community-based approach to enhance downward accountability and promote a violence-free environment. While protection activities play a crucial role in offering support and safeguarding to refugees, they primarily focus on providing immediate assistance without addressing resolution aspects intended in the functions of complaint mechanisms – to sanction perpetrators and ensure justice and accountability to those harmed. Consequently, individuals who do not engage with these systems due to a lack of confidence in the effectiveness of complaint mechanisms, may still fall through the cracks, leaving some victims without protection.

6.2.9. Reporting discrepancies

The section above illustrates how accountability deficits and power imbalance have hindered downward accountability, with refugees still disinclined to report SEA cases. Despite the mechanisms in place, there remains a palpable reluctance among refugees to report SEA incidents, leading to a substantial gap between the actual occurrences and the cases formally reported. Interviews with participants, such as B16 and B19, reveal a notable discrepancy between the reported figures and the broader narratives within the community about SEA.

For example, an interviewee (B16) remarked, "The reported figure is considerably low. Yet, within the community, there's widespread talk of incidents, including abuses by army personnel, border guards, and members of the host communities." This sentiment is echoed by another aid worker (B19), who noted a distinct disparity during his two-year deployment at the camp, encountering only a single safeguarding complaint. Further emphasizing the gravity of the situation, aid worker (B28) stated, "The evidence of SEA is palpable and visible within the camp itself, yet there's a prevailing belief among the community that reporting these incidents will not lead to any substantial action."

These observations corroborate findings from sectoral global reviews on PSEA, such as those conducted by Reddick (2021) and the Safeguarding Resource and Support Hub (2021), which both pointed out significant inconsistencies between the reported cases of SEA and the empirical evidence collected from communities (Feather et al., 2021). This understanding is widely recognized among safeguarding specialists (e.g., interviews with D1-4, D6, D8-10; Rohwerder 2022) and aligns with my direct field experiences, where the challenges of encouraging affected populations to come forward with complaints were personally witnessed and managed.

Thus, the underreporting of SEA cases highlights a critical need to address the barriers that prevent affected individuals from reporting, highlighting the importance of establishing a more effective, transparent, and responsive complaint mechanism that can bridge the gap between the actual occurrences of SEA and the instances that are formally acknowledged and addressed by humanitarian organizations.

6.3. CHS: Theory into practice

This section embarks on a detailed examination of the CHS in action within refugee camp setting, specifically focusing on how aid organizations design and manage complaint mechanisms for reporting SEA concerns. Through a critical lens, it scrutinizes the spectrum of complaint mechanisms rolled out by various aid providers, linking the effectiveness and comprehensiveness of these mechanisms to their respective levels of CHS affiliation. The following section discusses 1) the correlation at the organisational level between the level of CHS affiliation and the robustness of complaint mechanisms

implemented by aid providers; and 2) level of awareness on the CHS among aid workers across head office in Khartoum and frontline aid workers based at the camps.

6.3.1. Organisational level

At the organisational policy level, the empirical findings reveal a direct correlation: the higher the level of affiliation and compliance with CHS (CHS-certified being the highest and non-CHS being the lowest), the more comprehensive and robust the organizational responsibilities become in relation to complaint mechanisms. As highlighted in Table 10, all CHS-certified agencies examined have not only established policies but also implemented clear policy rollouts involving community consultations and the use of complaint registers – prerequisites for demonstrating CHS commitment on complaint mechanisms.

In contrast, aid providers lacking affiliation with the CHS verification scheme, referred to as ‘non-CHS NGOs,’ exhibit a noticeable gap in their emphasis on accountability and complaint mechanisms. As illustrated in the table, these organizations, especially national NGOs, demonstrate a limited focus on developing policies and their effective rollout of complaint mechanisms. Instead, they appear to prioritize the measurable outputs of their interventions, adhering to a 'Good Enough' standard, as discussed in Chapter 2 section 2.3. In essence, non-CHS NGOs position complaint mechanisms as marginal components within their downward accountability approach.

Table 10 Level of CHS affiliation and CHS compliance

		Policy	Policy rollout	Implementation	
Level of CHS affiliation		Complaint Mechanisms policy	Staff training on Complaint Mechanisms	Community consultation to design CM	Use of complaint register/log
CHS-certified	iNGO 5				
CHS-certified	iNGO 6				
CHS-certified	iNGO 7				
CHS-certified	iNGO 8				
CHS-certified	iNGO 9				
CHS-certified	iNGO 16				
CHS-certified	iNGO 17				
CHS-verified	iNGO 10				
CHS-verified	iNGO 11				
CHS-verified	iNGO 12				
CHS self-assessment	iNGO 3				
CHS self-assessment	iNGO 4				
CHS self-assessment	UN 1				
CHS Alliance member	iNGO 1				
CHS Alliance member	iNGO 2				
Non-CHS	iNGO 13				
Non-CHS	iNGO 14				
Non-CHS	iNGO 15				
Non-CHS	National NGO 1				
Non-CHS	National NGO 2				
Non-CHS	National NGO 3				
Non-CHS	National NGO 4				
Non-CHS	National NGO 5				
Non-CHS	National NGO 6				
Non-CHS	National NGO 7				
Non-CHS	UN 2				
Non-CHS	UN 3				
Non-CHS	UN 4				
Non-CHS	UN 5				

Empirical data generated from the interviews, document review, and secondary source

	document available
	absence of document
	insufficient data available to judge

There was, however, a distinctive exception within the category of national NGOs, where a profound commitment to accountability was discernible. This particular national non-CHS NGO had successfully integrated accountability practices by engaging regularly with the community and prioritizing active listening. Despite not being affiliated with the CHS verification scheme, the aid worker representing this NGO (B4) displayed an extensive understanding of CHS commitments. When questioned about his familiarity with the CHS, he shared that his previous employer was a CHS-certified agency and he played a vital role in delivering training to staff in his previous role. His passion for the CHS were palpable even through a remote Zoom interview, as he enthusiastically displayed the CHS poster in his office.

This exceptional case indicates the variation in knowledge and the development of relevant guidance on complaint mechanisms within the camp, emphasizing the potential for certain non-CHS-affiliated entities to still embody robust accountability practices. Furthermore, it emphasizes the significant impact of dedicated individuals designated to lead CHS initiatives with authority. This echoes the comment referred by the safeguarding expert in my interview about effectiveness of mechanisms determined by the dedication of individuals responsible for safeguarding (Chapter 6.2.6 IASC PSEA Network).

Another finding reveals high level of knowledge of CHS among aid workers based at head office in Khartoum but significantly varied level among frontline aid workers based in the camps. Senior aid workers in Khartoum express extensive knowledge on CHS and complaint mechanisms with many able to describe details of their complaint mechanisms. For instance, NGO A has a monthly tracker of complaints with categorisation by sensitivity and monitors the process cycle of complaint management. However, frontline workers particularly national staff and community volunteers who are refugees themselves, largely have limited knowledge of CHS.

Table 11 Aid providers' application of complaint mechanisms

		Types of complaint mechanisms			
Level of CHS affiliation	Type	Complaint box	Hotline	Household visits	Community leaders
CHS-certified	iNGO 1				
CHS-certified	iNGO 2				
CHS-certified	iNGO 3				
CHS-certified	iNGO 4				
CHS-certified	iNGO 5				
CHS-certified	iNGO 6				
CHS-certified	iNGO 7				
CHS-verified	iNGO 8				
CHS-verified	iNGO 9				
CHS-verified	iNGO 10				
CHS self-assessment	iNGO 11				
CHS self-assessment	iNGO 12				
CHS self-assessment	iNGO 13				
CHS Alliance member	iNGO 14				
CHS Alliance member	iNGO 15				
Non-CHS	UN 1				
Non-CHS	UN 2				
Non-CHS	UN 3				
Non-CHS	UN 4				
Non-CHS	UN 5				
Non-CHS	iNGO 16				
Non-CHS	iNGO 17				
Non-CHS	National NGO 1				
Non-CHS	National NGO 2				
Non-CHS	National NGO 3				
Non-CHS	National NGO 4				
Non-CHS	National NGO 5				
Non-CHS	National NGO 6				
Non-CHS	National NGO 7				

Empirical data generated from the interviews, document review, and secondary source

	document available
	absence of document
	insufficient data available to judge

6.3.2. Community level

At the community level, the application of the Core Humanitarian Standard (CHS) exhibits significant diversity, as indicated above. At minimum, regardless of affiliation to CHS verification scheme, all aid providers recognise the importance of community participation – one of the three pre-requisites for downward accountability as discussed in Chapter 2 section 2.2. This highlights a shared emphasis on consulting communities for the design of complaint mechanisms, with CHS-certified agencies implementing a broad spectrum of mechanisms for handling complaints.

As part of data analysis, the thesis further assessed the variety of complaint mechanisms implemented by different actors based on their CHS affiliation levels—ranging from those with no CHS affiliation to CHS Alliance members, CHS verified and certified agencies. The Table 12 below shows types of complaint mechanisms that each actor has designed and implemented categorised by the level of CHS affiliation. The data was provided by a total of 29 aid providers (17 international NGOs, 7 national NGOs, and 5 UNs) through my semi-structured interviews and email correspondences following the interviews.

Table 12 Correlation of the level of CHS affiliation and utilisation of complaint mechanisms

Actors	Total	Complaint box	Hotline	Community leaders	Household visits
CHS-certified actors (most robust; independent annual audits)	7	7 (100%)	7 (100%)	7 (100%)	7 (100%)
CHS verified actors (sufficiently robust, independent bi-annual audits)	3	3 (100%)	3 (100%)	3 (100%)	3 (100%)
Actors who have conducted CHS self-assessment (internal assessment with no external verification)	3	3 (100%)	3 (100%)	2 (67%)	3 (100%)
CHS Alliance members who have not undertaken verification scheme	2	2 (100%)	1 (50%)	1 (50%)	2 (100%)
Actors with no affiliation with CHS	14	11 (79%)	10 (71%)	8 (57%)	5 (36%)

The interviews with actors with no affiliation with CHS further revealed limited range of complaint mechanisms among them; however, actors, regardless of association and understanding of CHS, indicated high level of awareness on PSEA and camp-based referral systems for safeguarding and

protection concerns. Many referred the PSEA training which was conducted by IASC PSEA Network and could give specific names of actors who are assigned and responsible to manage protection concerns across the refugee camps. This understanding indicates effective awareness raising by IASC PSEA Network.

In conclusion, the empirical findings clearly demonstrate a direct correlation at the organizational policy level: organisations with higher CHS compliance—especially those that are CHS-certified—exhibit a stronger commitment to developing robust complaint mechanisms. The analysis also highlights a discrepancy in CHS awareness among aid workers at the headquarters in Khartoum compared to frontline aid workers based at the camps, highlighting the variation in the extent to which CHS is being applied. Despite this, a common thread across all levels of CHS affiliation is the recognition of community participation's critical role in designing effective complaint mechanisms. This is further evidenced by evaluation of the diverse complaint mechanisms across the spectrum of CHS affiliations, revealing that CHS-certified agencies implement a wider range of mechanisms, thereby affirming the value of CHS certification in strengthening the accountability and responsiveness of these systems. The following section takes this discussion further by extending and merging the analysis from the lens of CHS (with specific focus on Commitments 4 and 5) and powercube framework to answer my overall research question.

6.4. Applying the powercube lens to the CHS Commitments

This section further analyses complaint mechanisms by applying the powercube framework to analyse CHS Commitments 4 and 5. As elaborated in Chapter 2 section 2.5.6, CHS Commitments 4 and 5 are concerned with key components of complaint mechanisms. Commitment 4 focuses on communication, participation and feedback with affected populations to design accessible complaint mechanisms, while CHS Commitment 5 stresses the importance of establishing effective and safe complaint mechanisms. In the sections below, Gaventa’s powercube framework serves as an analytical tool for deeper analysis of how power relations impact the design, implementation, and effectiveness of complaint mechanisms which are guided by CHS Commitments 4 and 5.

6.4.1. Spaces of power and relevance to CHS Commitment 4

CHS Commitment 4 with focus on community participation champions the idea that affected communities must be central to decision-making processes, including the development of complaint mechanisms. Analysing spaces of power reveals how various power dynamics can support or obstruct meaningful community participation. As detailed in Chapter 6, Section 6.2, in-depth assessment of individual complaint mechanisms illuminates the nuanced ways in which these dynamics manifest.

While designed to offer reporting channels for concerns, complaint boxes (Chapter 6.2.1), hotlines (Chapter 6.2.2), and disclosure via community leaders (Chapter 6.2.3) all obstruct community participation due to lack of privacy, accessibility, and trust/power dynamics respectively. These mechanisms limit the direct engagement of the broader community in the complaint process, thereby restricting open dialogue and participation and reinforcing closed space of power.

In contrast, household visits and protection desks emerge as 'invited' or 'claimed' spaces that significantly enhance refugees' ability to voice concerns. These methods prioritize adapting engagement approaches to meet the diverse needs and capacities of refugee populations, thereby upholding the dignity and preferences of individuals. Protection desks, in particular, provide a secure and recognized venue for refugees to report sensitive issues, including SEA, within a protected and respectful environment. The impact of these approaches and the increase in reported SEA cases is illustrated by a refugee participant who works for a NGO as a community volunteer,

> *"Before, the community was afraid (feeling shy) to come to the protection centres but now because of different actors doing community campaign they start reporting according (to) the staff working in protection actors. So we have [an] increase[d] number of reported sexual exploitation cases" (Interview with C2).*

The power dynamics displayed in this coordinated response echoes the power shift that Syrian women refugees in Zaatari refugee camp experienced through their vocational training programme called 'Women and Girl's Oasis' in Jordan (Jabbar & Zaza 2016). While the programme offers 'cash for work' scheme, it also creates safe place for women to share their experiences of violence and abuse in the Syrian conflict, allowing them to re-build peer support system and self-confidence. At this 'safe

place', the women are able to exercise their invisible power to construct countervailing empowerment in displacement contexts. Similarly, the success of household visits and protection desks in Um Rakuba and Tunaybah Camps lies in the focus on fostering an environment where all individuals are empowered to participate, access information, and share complaints in a manner that is respectful, inclusive, and responsive to their needs.

6.4.2. Forms of power and reporting barriers

The findings from my empirical research highlight that the mechanisms for reporting complaints within the refugee camps are situated all across the domains of visible, hidden and invisible power. Firstly, the visible power held by aid providers and community leaders can impact the effectiveness of complaint mechanisms. How complaint mechanisms are designed (with or without consultation with refugees) and promoted through awareness raising and/or leaflets and posters, can either build trust or deter refugees from reporting. CHS Commitment 4 offers significant emphasis on this area. For example, complaint boxes are seen as a standard practice of putting a box near the NGO office as a tick box exercise (Interview with A29, B3, B15, D3). With no consultation with refugees on where to place this box, this mechanism fails to reach those who need service the most.

Secondly, the empirical data illuminates the problematic aspect of hidden power, particularly manifested through the actions of community leaders who hinder the reach and effectiveness of complaint mechanisms. Their actions, ranging from directing the flow of information on how to access and use these mechanisms, significantly restrict the accessibility and perceived safety of these reporting channels. Such practices not only lead to underreporting and mistrust in the mechanisms but also undermine the principles of accountability and inclusivity embedded in CHS Commitments 4 and 5.

Lastly, the invisible power manifesting through deeply embedded social norms and cultural beliefs, can discourage individuals from using complaint mechanisms. The mechanisms reveal significant digital and accessibility barriers that compromise their effectiveness. For instance, hotlines, while intended to provide a direct line for complaints, often remain underutilized due to a lack of access to necessary technology among certain groups, particularly among women and the elderly. This disparity is not merely a matter of resource distribution but is deeply influenced by gender norms and roles that dictate

technological access and literacy. Merry (2006), who examined human rights and gender violence in relations to technological access and literacy, highlights the critical role of gender norms that influences accessibility of technology.

Furthermore, fear of stigma within the communities and cultural taboos for challenging authority figures prevent refugees from reporting concerns. This dynamic disproportionately impacts vulnerable groups within the camps, who, due to societal expectations and cultural norms, may feel disempowered or fear repercussions for voicing their concerns. As elaborated by the aid worker in my interview:

> *"You know, it's a small world. Everyone knows what happens. Something happens one day; the next day, everyone knows. It's this culture you know, people don't want to report because they will then lose face in the community. I know one female refugee who had this situation, and she requested to move to another camp because she couldn't handle the stigma. It's very difficult, sister" (B17).*

This corroborates with the findings of Read-Hamilton et.al. (2016). Their study investigated UNICEF's project aimed at changing social norms to end violence against women and girls in displacement settings in Somalia and South Sudan. It highlighted how cultural barriers can silence voices that need to be heard especially among the most vulnerable groups in refugee camps. Although their study identified potential pathways for transforming cultural norms, the fear of stigmatisation acts as a powerful deterrent for reporting sensitive concerns such as SEA, thereby shedding the light to the complex interplay between invisible power and effectiveness of complaint mechanisms.

6.4.3. Levels of power: Gaps in local challenges and global aspirations

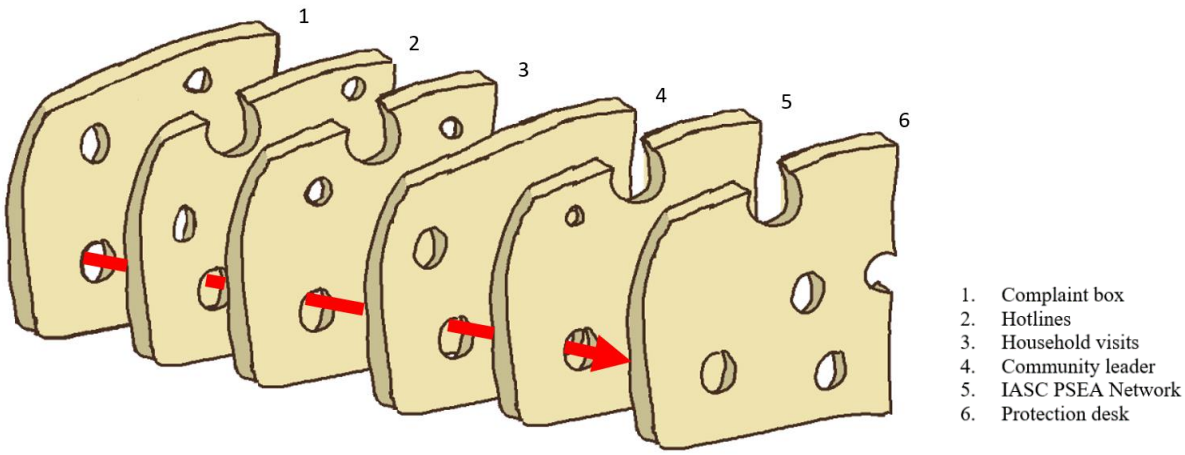
From the perspective of levels of power (local, national, and global), all complaint mechanisms explored in this thesis sit within local levels except IASC PSEA Network and UNHCR complaint mechanism. Complaint boxes, hotline, disclosure through community leaders, household visits, and protection desks are faced with local challenges such as limited telecommunication access, language barriers, and privacy concerns. This in turn creates barriers that restrict refugees' power and obstruct direct, meaningful engagement between refugees and aid providers.

At the global and national level, as elaborated in Chapter 6 section 6.2.5 and 6.2.6, the IASC PSEA Network and UNHCR complaint mechanism failed to encourage refugees to share their concerns primarily due to insufficient awareness of these mechanisms and a lack of timely and appropriate response to the issues raised. Despite their theoretical potential to enhance local-level complaint mechanisms through standard setting, capacity building, and provision of support, their impact has been limited. This discrepancy between the intended influence of these global networks and their actual effectiveness highlights a critical gap in the implementation and communication approaches employed by UNCHR and IASC PSEA Network.

Upon reevaluating the data through the lens of the CHS, a crucial observation emerges. The CHS appears to predominantly prioritize the establishment of mechanisms within closed spaces and invisible forms of power. This emphasis on closed spaces has, however, contributed to persistent challenges and a noticeable lack of substantial improvement in addressing the identified issues. This critical insight has brought attention to the need for reassessment of priorities within the aid sector to ensure a more effective and inclusive approach in safeguarding refugee populations, especially concerning instances of SEA.

6.5. Piecing together complexity: The ‘Swiss Cheese’ model illustration

The examination of various complaint mechanisms reveals a condition where each mechanism exhibits distinct strengths and limitations. On the surface, overall efforts around complaint mechanisms appear to be disorganised and lacking coordination, with a noticeable absence of central leadership to oversee inter-agency complaint management. Drawing inspiration from the ‘Swiss Cheese’ model, this approach acknowledges the inherent gaps within each individual mechanisms and provides a holistic view, aiming to illuminate specific aspects that might be overlooked, similar to identifying gaps in the metaphorical ‘Swiss cheese’ and thereby enhancing the overall effectiveness of the collective complaint mechanism.



Drawn by the researcher

Figure 18. 'Swiss Cheese' of collective complaint mechanisms

The 'Swiss Cheese' illustration in the Figure 18 above, illustrated by myself, symbolises the collective complaint mechanisms at the refugee camps. The six cheeses in the illustration represent different complaint mechanisms, and the holes within each cheese depict gaps and barriers inherent to these mechanisms. The presence of holes across the six cheeses indicates a collective failure, hindering the overall effectiveness of the complaint mechanisms.

As detailed in the previous section, six commonly utilized complaint mechanisms encourage reporting of concerns, including SEA among the refugee populations at Um Rakuba Camp and Tunaydbah Settlement. Examining each complaint mechanism in isolation reveals inherent limitations that may not comprehensively address the spectrum of challenges and reporting barriers. For instance, the hotline on its own offers reporting channels exclusively to adult refugees and those who are illiterate but can share concerns verbally with access to mobile phone; but it excludes those without access to phones and vulnerable groups such as children. Those without access to phone are however able to utilise disclosure through community leaders or at IASC protection desks. Similarly, those who are physically disabled and unable to reach a complaint box are able to utilise other alternative mechanisms such as household visits.

Recognizing that a single mechanism does not offer a comprehensive range of reporting channels, considering them as part of a wider system reveals that a diverse array of complaint mechanisms

collectively addresses and mitigates these limitations. This comprehensive approach acts as a buffer, closing off the holes in the 'Swiss cheese' to some extent, thus rendering the system more robust and effective.

As demonstrated above, the 'Swiss Cheese' analogy emphasizes that, similar to the distinctive holes in each slice of cheese, individual mechanisms possess specific strengths and weaknesses. The argument posited here transcends the pursuit of perfection within a singular mechanism; rather, it advocates for harnessing the complementary nature of diverse mechanisms. Therefore, the combination of diverse complaint mechanisms compensates for individual limitations, resulting in a more robust and comprehensive approach to handling complaints from refugee populations. In essence, the synergy derived from uniting these diverse mechanisms reflects a nuanced understanding of the complexities involved in addressing complaints, particularly on sensitive issues such as SEA cases. The collaborative nature of this approach acknowledges the imperfections within each mechanism and seeks to compensate for the gaps in other mechanisms. Collectively, the system offers a wide range of opportunities to report SEA concerns.

By acknowledging and incorporating the diverse strengths of individual mechanisms, this collective strategy not only amplifies the scope and effectiveness of the complaint-handling process but also demonstrates a commitment to providing a myriad of avenues for reporting sensitive issues. Therefore, it transforms the potential weaknesses of individual mechanisms into a cohesive and resilient system that stands better equipped to address the multifaceted nature of complaints within refugee populations.

The 'Swiss Cheese' analogy becomes a lens through which we recognize that not every mechanism needs to overcome every problem, but collectively they must offer a comprehensive range of opportunities to report which can be accessed by different groups with different characteristics and vulnerabilities. As we explore the context of refugee camps in Sudan, it becomes apparent that vulnerable groups, including individuals with disabilities, those with limited education, women and children, and the elderly, are especially at risk of being inadequately protected.

The identified gaps that exacerbate this risk include the followings: i) a lack of refugees' awareness of various types of complaint mechanisms, ii) exclusion of vulnerable groups, iii) inadequate safe,

appropriate spaces for sensitive dialogues, iv) not putting victims and complainants first during complaint management process, and v) a lack of sanctions against abusers.

6.5.1. Hole 1: Lack of refugees' awareness on the complaint mechanisms

The repeated findings from the data reveal refugees' limited knowledge and awareness of various types of complaint mechanisms. Across my interviews, all refugee participants acknowledged their knowledge of at least two complaint mechanisms, mainly complaint boxes; however, none of the refugee participants indicated their awareness of all six mechanisms under examination in this thesis. One female refugee who works at the women centres in the camp commented as follows:

> *"Not everyone knows about complaint mechanisms for sensitive cases. There are three protection clinics in the camp. Some people who are old don't know where the clinics are and where they can seek support for protection and complaints" (Interview with C1).*

9 refugee participants indicated their inability to understand the posters displayed in English. During my interviews on WhatsApp, I showed the printed poster obtained from the IASC PSEA Network website and asked the participants if they have seen this poster posted in the camps. Four participants recognised this poster in English; however, none have seen the poster in Tigrinya. The picture of the poster indicating zero tolerance against SEA was captured by one of my participants at the office of his NGO (Figure 21). As can be seen, it is in English and is not understandable to the majority of refugee populations in the camps.

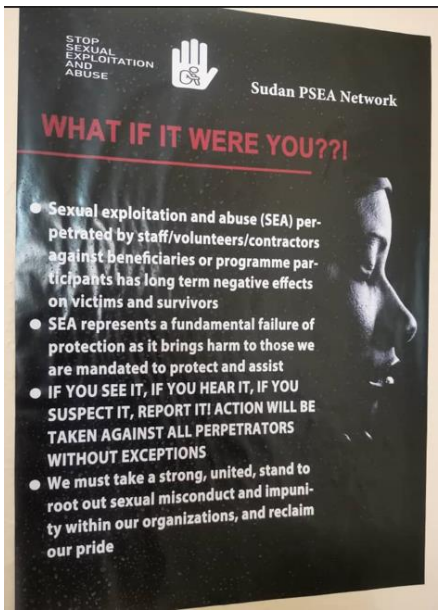


Figure 19. Posters produced by IASC PSEA Network

6.5.2. Hole 2: Exclusion of vulnerable populations

Heavily embedded within CHS, relevancy and appropriateness play a significant element in ensuring needs of diverse groups are considered in designing and implementing complaint mechanisms (Core Humanitarian Standard). Factors including gender, age, (dis)ability, culture, and national origin all influence the ways in which refugees are informed of, access and utilise complaint mechanisms (Collins 2017; Standke-Erdmann 2021; Hankivsky and Cormier 2011; Norwegian Refugee Council Sudan 2021). The current set up of complaint mechanisms excludes needs of approximately 1,429 refugees with disabilities and special needs[25] (8%) in Um Rakuba Camp and 1,760 refugees (19%) in Tunaydbah Settlement as of June 2022. One of the refugee participants who lives at the camp with his disabled sister described his challenges of neglect, stating:

> *"My sister is often one of the last persons to receive aid because it takes her a long time to walk to the distribution points. It's also not safe for her to walk around in the evening because some people from the host communities have threatened her in the past…" (Interview with C5).*

In this interview, when the interviewee was asked if he and his sister are aware of complaint mechanisms that accommodate his sister's disability needs, he elaborated on his perspective of ineffectiveness of complaint boxes. When prompted about household visits and community leaders, he showed his dissatisfaction of his and his sister's voice not being heard by aid providers and community leaders. Similarly, the study on refugees with disabilities in Um Rakuba Camp conducted by International Disability Alliance (2021) shared a quote from a disabled refugee as follows:

> *"Supervisors and managers of the camp hold negative attitudes towards persons with disabilities; when we tried to raise our concerns and voice our needs, we face ignorance and neglect and sometimes they were not willing to hear us" (2021: 23).*

[25] Um Rakuba Camp consists of 18,660 refugees as of October 2022 with 4% disabled (Islamic Relief Worldwide 2021) and 4% identified as those with special needs including unaccompanied children seeking asylum, women and older persons at risk and single parents (UNHCR 2022). Of 19,560 refugees in Tunaydbah Camp, 9% are persons with disabilities (Islamic Relief Worldwide 2021) and 10% are those with special needs (UNHCR 2022).

This sense of dissatisfaction was echoed in multiple interviews and validates findings from NGO reports and research by thinktanks (Plan International 2020; CHS Alliance 2020; CARE 2023; Ground Truth Solutions 2022). This correlates with my field experience of interacting with people affected by crisis. Such challenges on exclusion of disabled populations have been widely examined as key barriers to encourage reporting of SEA in other refugee settings. For instance, Koirala & Eshghavi (2017) who researched on Iranian refugee community in the United States and Yacob-Haliso (2016) claimed discrimination and threats of sexual violence and exploitation are exacerbated due to disabilities. As reflected in these studies, the intersecting forms of barriers and vulnerabilities that those with disabilities face are well documented.

Furthermore, out of six complaint mechanisms examined in this thesis, three hotlines offered by the host state, UNHCR, and individual NGOs, require refugees to use mobile phones to call the hotline numbers. As elaborated earlier in section 6.3, this overlooks those with no or limited to access to mobile technology. This stresses the importance of considering the socio-economic context and technological infrastructure within the refugee community when implementing a hotline-based complaint mechanism.

6.5.3. Hole 3: Absence of safe, appropriate spaces for sensitive conversations

Navigating the intricate landscape of addressing SEA within refugee camps reveals a critical gap in the form of inadequate and unsafe spaces for sensitive conversations. This third hole in the 'Swiss Cheese' model exposes multifaceted challenges that hinder the effectiveness of complaint mechanisms and discourage the reporting of SEA incidents. Language barriers emerge as a significant hurdle, with posters about complaint mechanisms predominantly available in English, and two aid workers in the interviews estimated that the vast majority of frontline aid workers based at the camps do not speak the local language of the refugee populations (Interviews with B3 and B). The deeply rooted norms and power dynamics within refugee communities create an environment where challenging the status quo is met with resistance. The fear of unintended repercussions, combined with a perceived lack of accountability for perpetrators and insufficient knowledge of complaint mechanisms, contributes to the underreporting of SEA incidents. In exploring this critical gap, we unveil the intricate interplay of

language, culture, and fear that undermines the creation of safe and appropriate spaces for refugees to voice their sensitive concerns.

Language

Language is a significant hurdle to maximize or hinder opportunities to respond to complaints of SEA. Currently, information about all types of complaint mechanisms as well as PSEA posters are distributed and posted on walls in public locations including Covid-19 centre, registration centre, markets, women's clinics and early childhood care and development centres (Gedaref Weekly Update by UNHCR/Refugee Consultation Forum 3 – 10 February 2022; Interview with B9). Despite the wide dissemination, many are written in English and some translated into local language Tigrinya, leaving a substantial portion of refugees unable to access and comprehend vital reporting channels. Aid workers (Interviews with B6, B7) estimate the vast majority of aid workers do not speak Tiringia and rely heavily on community volunteers from refugee communities for translation.

For those who were aware of the complaint mechanisms, access remains a persistent barrier. Translation services are unavailable, leading key informants (Interviews with C3, C5), proficient in English, to share their experiences:

> *"I often translate messages for my family and friends. I often have to be the middle man to solve problems. I do this for my family…" (Interview with C5).*

For this reason, while friends and families can help with translation of their concerns, due to sensitive nature, SEA concerns often do not get reported through this channel. This echoes wide range of literatures including scholarships, such as Footitt et. al (2018), Hileman & Burnett (2016), Ammerschuber & Schenk (2017), and practitioners-led reports such as Danish Refugee Council (2016), CHS Alliance (2020), and Safeguarding Resource and Support Hub (2022).

Invisible power of culture: little scope to challenge the status quo

Culture plays an influential role in the way which complaint mechanisms are perceived by the communities (Ammerschuber et al. 2017; Humanitarian Practice Network 2011; Ground Truth Solutions 2018; CHS Alliance 2018). The extent to which people feel comfortable in making complaints is heavily determined by culture. In some countries, there is lack of an established culture of

complaining, challenging authorities or status quo, and raising questions when something goes wrong (Gurung et al. 2017). A review of the UK's approach to safeguarding in the humanitarian sector by Independent Commission for Aid Impact (2023) asserts that "profound power disparities and gender inequality contribute to a culture that normalises exploitation and abuse and discourages reporting" (v). Similarly, my case study reveals that the forms of inequality and exclusion are normalised in culture of the refugee camps. For instance, two vocal refugees expressed their frustration in my interviews about the power of host states and police officers who hold control over the lives of refugees.

This concurs with other research findings such as the research of Murray (2012) who studied the accounts of female SEA victims in refugee and conflict settings. His findings claim that "culture conditions women to endure abuse from male members of the community, making it difficult to mobilize women to protect themselves from SEA" (2012: 998). Manifested as invisible power, culture and normalised way of thinking that host states, aid workers, and host communities are powerful and refugees themselves cannot challenge the status quo - contributes to increasing reluctance of refugees to share their concerns particularly if concerns are about behaviours of powerful actors, i.e. SEA.

These themes were echoed in my interviews with two whistleblowers (D10, D11) who exposed instances of SEA within the Red Cross and UNAID. They both emphasized the harmful effects of actions taken by senior male staff wielding power over their junior female staff, showcasing the widespread issues at both individual and systemic levels. It highlights the deep-seated inequalities and systemic normalization of exclusionary practices across diverse settings within the aid sector.

Fear of stigma and repercussions

Given the sensitive nature of SEA complaints, the fear of repercussions as well as prevailing stigma reinforces reluctance from the communities to report SEA complaints. This sense of fear stems from 1) the underlying hidden power of NGOs and 2) invisible power embedded within the refugee culture. Firstly, hidden power of NGO is exercised almost subconsciously, creating fear of possible retaliation. The perpetrator, leveraging their influence, may employ tactics such as withdrawing crucial aid from the complainant, thereby exploiting their vulnerability. A local aid worker in my interview elaborated as follows:

> *"Refugees are in weak position, no power. And they see NGO workers with power. First thing that comes to her mind when she thinks about reporting is, no she cannot report because if she does, she will lose her food for family. She will lose her employment" (Interview with |B19).*

My experience of supporting a complainant who lived in a camp after the Middle East crisis demonstrates this clearly. In fear of retaliation, she required repetitive reassurance that i) she would not be withdrawn from the beneficiary list for future aid provision and ii) she would be protected from potential harm from the alleged perpetrator before she formally filed a report of SEA case.

Secondly, invisible power embedded within the refugee culture can also reinforce silence of victims. As a female refugee in my interview commented,

> *"I would rather suffer than bring out this in the public – whichever way I will suffer anyway" (Interview with C7).*

In some cases where complainants received relevant support (medical, legal, and counselling) from NGOs, they faced stigma within their communities, resulting in more hardships in their daily lives. As commented by the aid worker in my interview,

> *"I was supporting this female refugee who was a victim of rape and obtained psychological and legal support. But people found out and came to her tent to abuse her to get money that she was going to use to travel to the court in Gedaref" (Interview with B11).*

The culture of tolerance and belief that underpins inequalities is perpetuated within camp communities. This is demonstrated by burgeoning body of scholarship in a wide range of displacement contexts including refugee camps in Northern Uganda (Westerhaus et.al. 2018), Sudan (Westerhaus et.al. 2007), Rwanda (Williams et.al. 2018), and Tanzania (Martin 2021). The recent AAP assessment (UNHCR Ethiopia 2022) also shows fear of retaliation as one of the top five barriers for not reporting SEA cases for refugees. Consequently, fear for such unintended consequences and repercussions, combined with a perceived lack of accountability for perpetrators and lack of knowledge of complaint mechanisms, suppress SEA reporting.

6.5.4. Hole 4: Failure to put victims and complainants first

Upon establishment of complaint mechanisms, aid providers are advised to monitor the mechanisms, to keep and track logs of complaints to ensure closing of the loop for reported complaints (Core Humanitarian Standard Commitment 5). The empirical data reveals that refugees who have filed complaints of different types to host states and aid providers all stress a lack of response on the complaints.

> *"I complained to COR (Commission of Refugees, host state) and NGO but [did not] hear from them" (Interview with C4).*

> *"I complained but nobody got back to me with response, so I don't know what's happening" (Interview with C5).*

Aid workers (B16) also points out the weakness of the referral system between agencies, that the cases are often missed and do not get followed through. This validates findings from IASC PSEA Task Force (2012) who claims that "complaint mechanisms constitute a 'black hole' into which complaints disappear forever without getting proper attention" (2012: 11). Similarly, Pallis (2005) who examined the operation of UNHCR's accountability mechanisms claims that refugees' lack confidence in UNHCR's ability to follow through complaints and subsequent investigations. This implies that although refugees are encouraged to report complaints – in other words, although they are given an *invited* space of power by NGOs - a lack of response back from NGOs signifies that refugees' transformative power is not acknowledged. Subsequently, if a complaint is collected but not responded to and incorporated into programming, trust in aid providers' ability to address clients' needs is compromised (CDAC 2021; Martin 2021). Therefore, it affects trust and quality of relationships with affected populations, creating more barriers for reporting and resulting in poor downward accountability.

6.5.5. Hole 5: No sanction and punishment to the abusers

One of the key incentives to report a complaint regardless of type and sensitivity is justice restoration (Torribe 2018; Walker 1997; Olivos et.al.2022). However, a range of research studies (Murray 2000; add a few more; Global Safeguarding Review 2021) has confirmed that reluctance of victims to report

and pursue complaints commonly results in alleged perpetrators not being punished. With a lack of access to the domestic justice system (Da Costa 2006; Bender 2021), refugees rely on either i) the camp-based legal system based on Ethiopian traditional community structure or ii) complaint mechanisms established by aid providers (Interview with B21).

As elaborated in Chapter 5 section 5.3, the traditional community structures are led by elected community leaders who exercise their invisible power to influence decision making. While most disputes within the camps are resolved by them based on Ethiopian justice system (Interview with C2; Grief 2006; McConnachie 2014), the empirical data revealed that community leaders are sometimes found unresponsive if the complaints were about their close ties or the complaints are reported by women (Interview with B20, C8). Bender (2021) further exposes regular abuse of power by community leaders who go unchecked and argues that "the lack of checks and balances of community leaders…often hurts the ones most vulnerable and results in the blatant absence of concern for refugees' rights and well-being" (Bender 2021: 12).

Similarly, complaint mechanisms set up by individual NGOs also offer no proof of justice restoration. While the majority of UN and NGO staff in my interviews refused to provide information on the specific number of SEA complaints received,[26] the empirical evidence indicates that aid providers frequently do not follow up with the complaints, leaving complainants in question about if their reports have resulted in positive outcomes such as justice for the complainants and victims. Practitioner-led reviews on safeguarding and PSEA (CHS Alliance 2022; Oxfam 2021; Save the Children 2019) indicate similar challenges due to limited resources to follow up through complaint management and investigation as necessary. This is validated by the recent SEA risk assessment (Consultation Refugee Forum et. al. 2022) revealing a "perception among refugees that disciplinary actions are not taken against perpetrators of SEA when reported" (2022: 7).

The failure to follow through complaints lies in the contestation of accountability – aid providers are prioritising resource investment in the mandatory areas such as donor reporting, focusing on upward

[26] Three aid providers shared number and types of complaints received in 2022; the figures are not disclosed due to confidentiality and requests from the participants.

accountability (Interview with B12, B6). In many cases, insufficient human resources are invested in safeguarding and protection capacity at the field level (Interview with B12, B121, B13). An aid worker in my interview admitted that his organisation should invest more in safeguarding and complaint mechanisms as culture of zero tolerance against PSEA is not embedded across the organisation (Interview with A4). While a lack of resources and time are acknowledged, high awareness of reporting challenges and commitments results in only a small number of complaints that have resulted in sanctions of alleged perpetrators[27]. This demonstrates that accountability is implemented in multiple dimensions, highlighting the negotiation process which NGOs navigate to construct a balance between competing accountability logics.

6.6. Conclusion

This chapter has undertaken a comprehensive examination of six complaint mechanisms within the framework of the CHS, scrutinizing their design and management through the lens of accountability and power dynamics. The intricate interplay of visible, hidden, and invisible forms of power has been demonstrated to profoundly influence the implementation of these mechanisms, exposing how gendered power dynamics and other intersecting inequalities exacerbate the challenges associated with these systems. Gendered power dynamics, alongside other forms of power asymmetries among actors in complex displacement contexts, contribute significantly to reporting barriers, hindering effective mechanisms for addressing SEA within refugee communities. The overarching power imbalance obstructs downward accountability to refugee populations, creating formidable obstacles to encouraging SEA reporting.

[27] One case was about a friend of a female refugee (B3) in my interview, who reported a case of sexual harassment by an aid worker at NGO. She went through investigation, and the alleged perpetrator was terminated after the investigation. The second case described by C15 was about a Tigray woman married a man from another tribe. After marriage, he started beating her. She filed a case of domestic violence against her husband. The case was transferred to the police who followed up and kept the baby safe. When she went back to her tent, her husband beat her again so the protection agency transferred her to another camp for her safety. The last complaint shared by C9 was reported by a refugee against a community leader in her zone for including his families and excluding women from the list of distribution to receive aid. The organisation investigated and handled the case with appropriate solutions.

The ‘Swiss Cheese’ framework further demonstrates that individual complaint mechanisms do not necessarily offer a comprehensive range of reporting channels; however, it acknowledges the potentials of collective mechanism working together as a buffer to mitigate barriers identified within the thesis. The limitations of existing mechanisms highlight the missed opportunities to cover the most vulnerable groups who have the highest risks to encounter SEA. This chapter therefore argues that existing complaint mechanisms have created limited opportunities for refugees to report SEA cases and have failed to address the deep-seated gendered power dynamics and other structural inequalities that perpetuate SEA, thereby leading to the poor application of CHS principles in practice and significant underreporting and failures to prevent SEA cases.

This analysis highlights the necessity for a coordinated, gender-sensitive, and multi-faceted approach that leverages the strengths of various complaint mechanisms. Such an approach must explicitly address gendered power dynamics and other intersecting forms of inequality, enhancing their collective effectiveness and inclusivity. By doing so, the aid sector can better navigate the complexities of power dynamics inherent in displacement contexts, thereby improving the overall robustness of the complaint-handling process. This approach is crucial for advancing the goals of accountability and protection within the aid sector, ensuring that all individuals, regardless of gender or other characteristics, have equitable access to safe and responsive mechanisms for reporting and addressing SEA.

Chapter 7. Conclusion: Lessons learned to prevent past mistakes

Safeguarding and accountability of NGOs has been a subject of much debate but to date there is little evidence regarding the effectiveness of the systems that have been implemented in terms of their ability to truly protect and prevent sexual exploitation and abuse (SEA) of vulnerable people. While complaint mechanisms, intended as a safe space for affected populations to voice their concerns, have increasingly become embedded in practice, sexual exploitation and abuse continue to occur even after high-profile scandals, media scrutiny, and tightening of safeguarding systems and procedures across the sector. The thesis has sought to dig deeper to understand why this is still the case by examining the potential of complaint mechanisms using in-depth analyses of downward accountability in theory and practice. This was done by using a discourse analysis approach called 'What's the Problem Represented to be' and a case study of refugee camps. It contributes to emerging literature by enriching scholarly understanding of how effective the mechanisms are in preventing and tackling SEA. The thesis links accountability literature with safeguarding, explores the dynamics of power between NGOs and affected population and in doing so, has uncovered a number of shortcomings in the current complaint mechanisms. It has also identified areas for improvement for the use of complaint mechanism to prevent SEA.

In this concluding chapter, I summarise the core findings revealed throughout this research and provide further analytical insights on complaint mechanisms as the key approach to tackle PSEA. Building on my direct experiences grounded in practice in the field and technical engagement to mainstream the CHS and safeguarding, the thesis ends with my academic and policy contributions, recommendations on what more effective safeguarding approaches could look like, such as integration of the 'Swiss Cheese' and powercube into the revised CHS.

7.1. NGO accountability and regulations in safeguarding

Accountability in the aid sector is a long-established and prominent issue. It is essential in shaping and influencing the ways in which aid is delivered to affected populations. Often described as 'chameleon-like' for its different meanings in different contexts (Everett & Friesen 2010; Pollitt and Hupe 2011), it is a multidirectional and highly complex concept. Drawn from the sectoral definitions provided by

scholars, policy makers, and practitioners, accountability in this thesis was defined as a participatory process in which actors exercising power, are held responsible for the stakeholders that they serve, i.e. there is genuine downward accountability.

Literature on accountability predominantly discusses how NGO's working in humanitarian settings experience and operationalise multiple types and directions of accountability, including to a variety of stakeholders (Ebrahim 2003; Obrecht 2012; Schmitz 2012; Crack 2014). In responding to the wide range of stakeholders, NGOs manage various accountability logics and conflicting demands in four directions – upward, downward, horizontal, and internal (Edwards and Hulme 1996; Prakash and Gugerty 2010). NGOs are upwardly accountable to donors and governments who impose legal requirements with terms and conditions (Najam 1996; Fowler 1996) while they are also downwardly accountable to affected populations on a moral and market basis (Tong 2004; Prakash and Gugerty 2010). Accountability also extends horizontally to peer NGOs as well as internally to NGO's board and staff (Dwyer and Unerman 2008; Murnaza 2012). These multidirectional accountability logics and demands have fuelled scholarly attentions for over two decades.

Across various theories and approaches on accountability, scholars have explored accountability from a wide range of spectrum – principle-agent theory on one hand and constructivist theory on the other. As elaborated in Chapter 2, PA theory, with its focus on narrow, short-term compliance, seeks to constrain or control NGOs' behaviours to achieve the goals of the donors. The voluntary accountability club framework that comes under PA theory highlights the use of standards and enforcement with sanction capacities. The constructivist approaches in contrast stresses mutuality and cooperation over competition and offers space for different types of relationships to exist among NGOs and various stakeholders.

As the concept of accountability has moved from an emerging language to become increasingly embedded in practice, more recent scholarship has considered whether accountability demands can be complementary to one another rather than competing; or whether a balance can be constructed between different accountability demands for multiple stakeholders (Nurul 2015; Berghmans et al. 2017). This

thesis builds on this perspective and argues that competing accountability demands can facilitate a mutual relationship with downward accountability to affected populations.

The 2018 Haiti Oxfam scandal marked a turning point, triggering heightened scrutiny of NGO accountability and safeguarding practices. In response to the crisis, Oxfam's accountability challenges unfolded on multiple fronts. Oxfam faced intensified accountability demands from regulators, as evidenced by inquiries from the Charity Commission and International Development Committee (IDC). The CC's 150-page report and the IDC's detailed scrutiny led to Oxfam's adoption of a comprehensive 100-point Action Plan for safeguarding improvements. An official warning from the Charity Commission prompted Oxfam to focus on enhancing safeguarding resources and capacity, meeting accountability demands from regulatory bodies. In the midst of the scandal, the actions of Oxfam expatriates were heavily condemned by the President of Haiti Jovenel Moïse (BBC 2018). Throughout the crisis, Oxfam grappled with dilemmas and trade-offs, navigating a complex negotiation process to address the varied accountability demands of different stakeholders.

At the organisational level, NGOs sign up to a range of regulatory frameworks as a means to establish their commitment to accountability. Regulations range from codes of conduct that NGOs register to self-proclaim with no further requirements, to certification initiatives with robust verification processes. Voluntary peer regulations have abundant in recent years as a way for NGOs to demonstrate accountability (Omelicheva 2004; Jordan 2005; Lloyd et al. 2007). They are used to send signal of reputable credibility to donors and the public (Tremblay-Boire et al. 2016; Traxler et.al.2018) in order to "defend against criticism of poor accountability from hostile parties" (Crack 2014: 420).

Among NGO accountability standards, CHS is more thorough than others, standing prominently as the sector-wide outcome of an extensive global consultation process, replacing the three largest quality and accountability initiatives across the aid sector. Not only that, it is the only global standard with two distinctive mechanisms – regulatory and collaborative bodies combine to produce a stringent verification process as well as mutual collaboration process. Drawn from theoretical and empirical literatures as well as my direct experience in accountability and safeguarding, the thesis has provided

an in-depth analysis of framing (knowledge production) through the CHS both in theory and application.

The thesis employed two methodological approaches to investigate CHS within theoretical and practical contexts. In the first phase, the 'What's the Problem Represented to be' (WPR) approach was employed to explore discursive aspects of CHS to reveal what is presented as the 'problem' within the standard. This approach helped assess how problems of accountability were framed, and how this influences interpretation of the standard by users when designing complaint mechanisms for implementation on the ground. Based on the set of six questions of WPR, this methodology involved thorough examination of the texts of the standard itself, followed by 34 semi-structured interviews with stakeholders who had participated in the CHS Consultation Process in 2014, along with review of 128 documents. This phase explored the discursive aspects and thus directly addresses the first sub-research question: To what extent does the CHS, in providing as sector-wide standard in accountability, maximize the opportunities for NGOs to respond to complaints of SEA?

The second phase focused on the application of CHS, and for this a case study was conducted in Um Rakuba Camp and Tunaybah Camp in Sudan. As shown in the literature review (Chapter 2 section 2.4), refugee camps exemplify humanitarian settings that create a permissive environment whereby SEA flourishes. Um Rakuba Camp and Tunaybah Camp therefore offered appropriate and revealing sites for this research to reveal the actual challenges pertaining to accountability and safeguarding. The location was suitable also to assess effectiveness of complaint mechanisms across multiple NGOs and to examine the effectiveness of an inter-agency coordination body on PSEA. This phase encompassed semi-structured interviews with 31 aid workers in Sudan, 14 refugees residing in the selected camps, and 12 safeguarding specialists with experience in displacement contexts or Africa. Follow-up correspondence with selected participants provided further insights. This was complemented by in-depth review of media and public documents, which was necessary in light of the pandemic-related restrictions which affected my research (see Chapter 3).

In undertaking research into accountability in the context of refugee camps, it was necessary to go beyond a narrow focus on CHS and acknowledge that in practice accountability is often implemented

through a complex web of mechanisms. These are established by three key actors in refugee camps, namely the host state, UNHCR, and implementing NGOs. Facing multiple stakeholders with conflicting demands, all players are obliged to be accountable to an array of stakeholders and ultimately to refugee populations. Within this matrix of accountability mechanisms, complex and shifting power dynamics influence ways in which accountability policy is applied. Using Gaventa's powercube approach (1980), the thesis analysed various dimensions of different types of power – forms (visible, hidden and invisible), spaces (closed, invited, and claims), and levels (global, national, and local to household).

With challenges arising from overlapping and contested areas of accountability, the mechanisms designed to identify and prevent SEA also vary considerably in terms of who can access them, what they are designed to capture, and the extent to which refugee voices have been included in their design and delivery. The intricate dynamics of power, encompassing various forms and sources, play a pivotal role in shaping the accessibility and reporting procedures of these mechanisms. A particularly troubling conclusion is that some of those most in need of protection - the disabled, less educated and poorer women, children, and the elderly - are particularly unlikely to be effectively covered. In this way, there is a risk that SEA reporting mechanisms are most effective for those who are least likely to need them.

7.2. Harnessing the CHS and complaint mechanism

Returning to my research questions, triangulating the outcome of the literature review, empirical data and secondary sources suggest that although CHS has reinforced policy development, it has not fully harnessed the potential of complaint mechanisms to encourage affected populations to report SEAs. This outcome is attributed to two key factors, as evidenced in Chapter 4 and 5. Firstly, at a theoretical level, the framing of the CHS itself has demonstrated an overemphasis on accountability to affected populations while downplaying the critical importance of explicitly addressing asymmetric power dynamics. This oversight is critical because the power imbalances between aid providers and affected populations are often at the core of SEA incidents.

The consultation process for the CHS reveals significant systemic issues, primarily due to power imbalances that influenced its development. Board-level conflicts and broader sectoral power struggles

led to a situation where the political battles of the most powerful stakeholders diverted essential focus from key topics such as safeguarding measures and SEA prevention (Chapter 4 section 4.3.2). This misallocation of attention, time and resources resulted in protracted debates on governance, overshadowing the need to enhance CHS provisions for safeguarding.

A gender-sensitive lens further reveals critical insights into the gendered and racialized dynamics of decision-making processes during the course of CHS consultation. The empirical evidence highlights that the CHS process is marked by a pronounced concentration of power among Western, white men, a demographic that dominates both international and local decision-making arenas. While an attempt was made to balance gender among the decision makers, it did not materialise; and this imbalance not only perpetuates systemic inequalities but also marginalizes diverse voices, particularly those of women and non-Western participants. The intersectionality of gender and race has shaped access to power and influenced outcomes within humanitarian governance.

Moreover, the process failed to sufficiently incorporate inputs from frontline staff and NGOs from the Global South, whose direct engagement with affected communities could have enriched the CHS with nuanced understandings of safeguarding and SEA issues. It reveals a significant gap at both the global and local levels, where important perspctives were excluded from the process. The methodology's inability to fully address power dominance and include diverse perspectives compromised the standard's potential to represent the collective knowledge of the aid sector effectively.

Further exacerbating the issue, the content of the CHS itself lacks an explicit framing of power dynamics, despite feedback urging the incorporation of language that encourages aid providers to think about shifting power towards affected populations (Chapter 4 section 4.4.2). The exclusion of safeguarding and gender expertise from the consultation process prevented a focus on gendered power imbalances, undermining the effectiveness of complaint mechanisms in addressing SEA. This oversight reflects a broader reluctance within NGOs to challenge existing power structures, perpetuating a status quo that sidelines the voices of affected populations. The ambition behind the CHS, while commendable, is significantly undermined by these shortcomings. This failure to integrate a power-

sensitive approach not only limits the CHS's capacity to drive transformative change but also highlights the systemic resistance to addressing the root causes of inequality and exploitation within the aid sector.

While the ambition to create a standard that embodies the collective wisdom of the aid sector is laudable, the flawed consultation methodology, characterized by unaddressed power imbalances and exclusionary practices, significantly undermines this goal. The board-level power struggles and the subsequent neglect of comprehensive discussions on safeguarding and SEA prevention highlight a critical gap in the CHS development process.

The thesis also explored characteristics and patterns of SEA to understand the root causes of safeguarding failures. The types of SEA committed within the refugee camps are diverse, encompassing exploitative relationships, verbal sexual abuse, and transactional sex. They are committed by a wide range of stakeholders including members of the host states, UNHCR, aid workers and host communities. The analysis of empirical data unveils profound power imbalances and distinctly highlights the particular vulnerabilities and risks that women and girls face. This includes overlooked aspects such as inadequate access to essential facilities with dignity, and systemic gender exclusion from community decision-making processes, which exemplify the dire consequences of power inequities and accountability vacuum on the affected populations, especially women and girls.

Turning to the empirical findings of the second phase, the thesis identified shortcomings of six individual complaint mechanisms. For instance, while complaint boxes may enable adult refugees to report misconduct, they systematically exclude numerous at-risk groups, including individuals with disabilities, the illiterate, and children. This exclusion reflects a failure in shifting the locus of power from a closed to an invited space, as conceptualized by the powercube framework. Additionally, the evaluation of hotlines exposes inclusionary deficits, and reliance on community leaders for disclosures does not address the need for transforming invisible power structures that perpetuate the status quo and entrenched patriarchal norms within camp settings. At the household level, gender-sensitive powercube analysis reveals that women, particularly those in female-headed households, face unique barriers due to societal norms and power imbalances that restrict their access to reporting mechanisms and amplify their vulnerability to SEA. With the Inter-Agency Standing Committee of the PSEA Network displaying

significant commitment for policy and training work, the Network suffers from a lack of organization and coordination across camps to manage inter-agency complaint mechanism.

Conversely, the implementation of protection desks, which are collaboratively managed by various organizations, stands out as a successful initiative. These desks have established a critical 'claimed' space, enabling refugees, particularly those with sensitive protection concerns, to voice their issues, thereby facilitating a degree of empowerment and engagement previously absent. By analysing the range of mechanisms across entities with varying levels of CHS affiliation, the thesis also reveals a direct link between the degree of CHS compliance and the effectiveness of complaint systems. Notably, higher CHS compliance correlates with more robust mechanisms. The analysis further uncovers disparities in CHS knowledge between headquarters and field staff, while emphasizing the universal recognition of community participation's importance in the design of these mechanisms. Ultimately, the research demonstrates that CHS certification significantly enhances the accountability and responsiveness of complaint mechanisms, showcasing the critical role of CHS standards in promoting effective humanitarian responses.

The thesis further concludes that while individual complaint mechanisms in isolation pose limitations and gaps, the potential for complaint mechanisms to encourage SEA reporting can be harnessed when mechanisms are collectively managed. The ‘Swiss Cheese’ analogy emphasizes that, while the wide range of different mechanisms increases the chance that instances of SEA will be reported, it nonetheless remains true that many of them are not feasible for the most vulnerable individuals. Moreover, individual complaint mechanisms on their own cannot address the power imbalances and lack of confidence that reports of abuse will be acted upon that so often undermine reporting.

While recognising the failure of expanding the boundaries of ‘closed’ space into ‘claimed’ space across visible, hidden and invisible forms of power, collective complaint mechanisms attempt to minimize the gaps to ensure that reporting barriers are reduced. The thesis has further dug deeper into understanding gaps in refugees’ awareness of the mechanisms; inadequate provision of safe space for sensitive dialogues; and failing to prioritise the needs of victims and complainants in the process. Lastly, it explores absence of penalties and sanctions for those engaging in abusive behaviours.

The thesis further discusses the deeply embedded invisible form of power manifested in social norms in the light of gender, disabilities and culture of male domination. Consequently, the thesis argues that accountability deficit and power imbalance have hindered accountability to affected populations, resulting in negative consequences that foster an environment where power dynamics are made left unchallenged, and vulnerable refugees, especially females, become targets for SEAs.

Based on this evidence-based account of why existing safeguarding practices through complaint mechanisms have fallen short in effectively addressing accountability deficits, the thesis reaches critical conclusion: the CHS does not provide a sufficiently rigorous framework for accountability that effectively tackles real-world power disparities. This inadequacy stems from the CHS's initial design, which lacked the foresight to address or challenge these imbalances directly. Consequently, this oversight has led to a limited progression of the standard, failing to fully capture and address the complexities of power dynamics. Thus, despite the CHS's notable achievements in enhancing policy frameworks, it has not achieved its potential in creating mechanisms that adequately empower affected populations to report incidents of SEA confidently.

The application of the CHS and complaint mechanisms have further highlighted that these mechanisms have primarily emphasized their predominant focus on visible power dynamics, while neglecting crucial dimensions of power, including hidden and invisible forms, especially at the local level and within closed spaces. This limitation stresses the pressing need for a more inclusive approach to framing accountability not only within the original CHS consultation process but also across broader implementation of accountability via complaint mechanisms.

The thesis further utilises a ‘Swiss Cheese’ illustration from risk management to visualise the relationship between different complaint mechanisms in the refugee camps. I argue that while recognising that individual complaint mechanisms come with specific strengths and gaps, we must harness the complementary nature of diverse mechanisms to compensate for individual limitations but must also endeavour to transform the gaps into collective strengths, creating a mosaic of opportunities and platforms for reporting SEA concerns. Exploring the intricacies of the ‘Swiss Cheese’ analogy as applied to the context of refugee camps in Sudan reveals a critical lens through which the gaps in the

current complaint mechanisms are illuminated. It is imperative to recognize that not every individual mechanism is expected to surmount every challenge; rather, the collective array of mechanisms collaboratively offer a comprehensive spectrum of opportunities for reporting and compensate for each other's shortcomings.

7.3. The limitations of this study

Acknowledging the valuable insights from this thesis, it is imperative to address certain limitations inherent in the research. First, the constraint imposed by the Covid-19 pandemic necessitated remote data collection, preventing in-person interactions. Second, the focus on an ongoing and dynamically evolving refugee crisis introduced complexities in identifying factors influencing the effectiveness of complaint mechanisms. Lastly, this research focuses exclusively on Sudan, indicating necessity for further research to understand the variation of key variables across different contexts. Future research should consider these constraints as opportunities for refinement to further enrich scholarly understanding of safeguarding and accountability within the aid sector.

7.3.1. Remote data collection due to Covid-19 pandemic

The Covid-19 pandemic significantly impacted the research process by necessitating remote data collection methods. The restrictions and safety concerns associated with the pandemic forced reliance on virtual means to gather information. This may have introduced potential biases and limitations in terms of data quality and depth. The inability to conduct in-person interviews, fieldwork, and on-site observations hindered my ability to build rapport with participants. As a result, the insights gathered through remote interactions may not fully capture the nuances and subtleties that could have been revealed in a more traditional research setting.

Moreover, remote data collection may have limited access to certain data sources or made it challenging to obtain certain types of information. For instance, access to physical records of complaint logs, on-site resources, or direct observations around the camps have been compromised. Future research would involve in-person data collection to overcome these limitations, enabling a deeper, more nuanced

understanding of the subject matter. Future research aims to incorporate in-person data collection to address these shortcomings, allowing for direct observations, detailed interviews, and access to physical resources, thereby enhancing the richness and authenticity of the findings for a more accurate and comprehensive understanding.

7.3.2. The focus on an ongoing refugee crisis

The specific focus of this thesis on an ongoing refugee crisis introduces unique challenges when it comes to drawing generalizable conclusions about the effectiveness of complaint mechanisms. As the situation is fluid and dynamic, the factors and influences on complaint mechanisms are likely to be evolving rapidly. While access to secondary resources including live updates via media reporting have helped shaped my understanding of the situation, the urgency and complexity of addressing an ongoing crisis may have made it difficult to conduct an in-depth examination of the subject. The research may have been influenced by time constraints, and some aspects of the complaint mechanisms may not have been fully explored due to changing situations on the ground.

Thirdly, this study did not sufficiently encompass the most vulnerable groups to achieve representative data coverage. These groups include individuals with disabilities, men and boys, lesbian, gay, bisexual, and transgender (LGBT) individuals who may face particular kinds of stigma and exclusion. These groups face unique challenges and exclusion, with their experiences potentially offering critical insights into systemic barriers and specific needs. The underrepresentation of these populations may have led to an incomplete understanding of the diverse vulnerabilities within the study's scope, highlighting the need for more inclusive research approaches.

7.3.3. The use of a single case study

This research presents a case study centred on refugee camps in Sudan, emphasizing its unique context. While single case study offers in-depth insights within specific context, it comes with inherent challenge of generalisability. This case study focuses on two specific refugee camps in East Sudan during the tumultuous period marked by the outbreak of civil war and the refugee crisis in Ethiopia that commenced in November 2021, alongside the civil unrest that erupted in April 2023. If the research

had been conducted in more stable, established refugee camps, the outcomes might have been diverged, offering insights with potentially broader applicability. The specific timing and location of this research provide its results with detailed insights, but more research should be conducted in other contexts to better understand the way that the intensity of conflict and stability in camps shapes key outcomes.

7.4. Implications for future research

7.4.1. Safeguarding prevention: Transformative power shift beyond accountability

The thesis argues that accountability to affected populations alone is insufficient for preventing safeguarding failures and SEA. Instead, it argues for a shift towards transforming power dynamics as a more effective means of safeguarding prevention. The empirical data that emerged across the CHS analysis (Chapter 4), the exploration of SEA realities in refugee camps (Chapter 5) and of complaint mechanisms (Chapter 6), consistently spotlight the pivotal role of power dynamics. These findings indicate that power either enables or obstructs the achievement of accountability and effective safeguarding.

In the light of this, future research should extend beyond evaluating existing initiatives to critically exploring a broad spectrum of community-level power-shifting interventions. The example of Read-Hamilton and Marsh (2016)'s study on UNICEF's Communities Care Programme illustrates a successful model of power transformation at the community level, aiming to mitigate violence against women and girls. This showcases a potential pathway for shifting power dynamics to empower affected populations to prevent and respond to safeguarding concerns.

This scholarly effort requires robust theoretical and analytical frameworks, such as Bradley's transformative power framework (2020), which advocates for "cultivating patterns of power rooted in equity, inclusion and liberation" (Bradley 2020: 107). By recognizing that power is not static but rather dynamic and transformative, this framework offers a valuable lens through which to examine and replicate successful interventions for safeguarding prevention through power transformation.

7.4.2. Safeguarding responses: Investigation and victim support

As identified in Chapter 6, significant gaps in safeguarding responses, specifically the inadequate focus on the needs of victims and complainants (Swiss Cheese hole 4) and the failure to effectively sanction perpetrators (Swiss Cheese hole 5), require the urgent need for further investigation. These issues directly impact what occurs post-reporting through complaint mechanisms, highlighting a critical area for future research. A lack of trust in complaint mechanisms stems from a prevailing low confidence in aid providers to thoroughly address complaints and ensure justice for complainants. It is as important to investigate complaints thoroughly and support complainants as it is to prevent misconduct and encourage reporting.

Despite much informal networks and knowledge exchange among safeguarding practitioners, a significant gap exists in rigorous research focusing on investigation processes and victim support, particularly from a victim-centred perspective. Due to delicate nature of investigation on sensitive topics which are generally all confidential and concerns over reputational management, NGOs may appear cautious about disclosing challenges and gaps publicly. For this reason, future research would require thorough research design to encourage transparency from NGOs. By identifying challenges post-reporting, the aid sector can significantly bolster its accountability and safeguarding practice, building trust and confidence of complaint mechanisms from affected populations.

7.5. Key academic contributions

This thesis makes significant contributions across multiple dimensions of academic research. The section below elaborates four specific contributions, namely i) conceptual framing of accountability; ii) new scholarship on CHS; iii) added value to empirical studies of downward accountability; and iv) safeguarding scholarship. Bridging the gap between theory and application, and enriching the scholarly understanding of the CHS and accountability mechanisms, the contributions collectively contribute towards addressing blind spots in NGO accountability measures in safeguarding, examining its impact on various aspects such as reputational management, legal considerations, and power dynamics within selected refugee camps. The examination of these measures encompasses various dimensions such as

reputational management, legal considerations, and power dynamics within selected refugee camps. Collectively, these contributions not only broaden the academic landscape but also offer valuable insights to practitioners, emphasizing the need for a more comprehensive and context-specific approach to NGO accountability in safeguarding.

7.5.1. The framing of accountability

Firstly, the thesis expands the existing literature on accountability by combining accountability club theory (first wave) and constructivist approach (second wave) to explore how accountability logics interact for both upward and downward accountability, leveraging their complementarity. CHS's unique accountability model consists of the regulative mechanisms (Humanitarian Quality Accountability Initiatives) that offer independent quality assurance, as well as the collaborative body of CHS Alliance to promote culture of continuous improvement (Fuchi 2022). The combination of the two mechanisms not only meets donors' requirements to sustain quality interventions but also initiates a more dialogical engagement process with a wide range of stakeholders. These features fit the characteristics of the third wave of accountability reform. As described by Crack (2016), the third wave "consolidates the progress of the second wave…and serves the intermediate end of satisfying the needs of donors, which in turn serves as a means to achieve the final end of living up to their moral mission" (1589). Thus, the thesis contributes to a broader understanding of accountability that is adaptable, context-sensitive, and aligned with the complex realities of NGO operations and stakeholder relationships.

The thesis also makes important contributions by going beyond research that narrowly focuses on particular NGOs (Agyemang et al. 2009). Instead, it brings new evidence on and analysis of inter-agency collaboration, shedding light on the collective efforts of aid agencies to promote the reporting of SEA. Moreover, responding to Hilhorst et al.'s (2022) call for research on highly under-discussed aspect of accountability on inter-agency coordination bodies, the research reveals insufficient accountability within the IASC PSEA Network due to inconsistencies and confusion regarding complaint management across humanitarian actors in refugee camps.

7.5.2. Added value to empirical studies of complaint mechanisms

This thesis significantly contributes to the empirical study of downward accountability, specifically by shedding light on the effectiveness of complaint mechanisms within the framework of the CHS. The historical dearth of empirical studies on this subject has left a considerable gap in scholarly understanding, particularly in assessing the practical applications and enhancements brought about by complaint mechanisms. This thesis stands out as a distinctive contribution, offering a comprehensive examination of complaint mechanisms. Only a handful of researchers (Kovach 2006; Brown 2008; Agyemang et al. 2009; Sinead 2014; Noor 2016; Berghmans et.al. 2017; Hielscher et.al. 2022) have discussed complaint mechanisms within the wider context of accountability mechanisms; and this thesis represents one of the first in-depth research dedicated to complaint mechanisms. No other literatures have combined power analysis into the framework of CHS and complaint mechanisms. The case study of Sudanese refugee camps further offers unique insights into implementation of complaint mechanisms in complex displacement contexts but also highlights the importance of contextual factors in its effectiveness. Therefore, this thesis contributes significantly to the empirical study of localised research and offers vital lessons for practitioners and policymakers alike.

7.5.3. Fresh contributions to academic scholarship on NGO regulations

The thesis contributes to the still relatively limited literature on the CHS. The standard has been increasingly referred to and signposted in qualitative research, particularly in case study research (Noor 2015; Awuah-Werekoh 2015; Bawole et al. 2016; Uddin et al. 2019; Berghmans 2022; Rahman 2023). However, very few research studies have focused on CHS as the standard itself, examining both its theory and application. The preceding global standards have received ample scholarly attention: for instance, *Sphere* (Salama el. at. 2001; Dufour 2004; Gostelow 1999; Ouyang et al. 2009; Christoplos 1999; Griekspoor & Collins 2001; Tong 2004; Crack 2016; Deloffre 2022); *People in Aid Code of Conduct* (Ahmad 2002); and *Humanitarian Accountability Partnership* (Callamard 1996; Kennedy 2019; Foran & Williams 2014; Everett & Friesen 2010; Arroyo 2014; Deloffre 2016; Crack 2016). CHS, however, has not yet received concerted scholarly engagement. While recent studies have signposted CHS as a mere reference within their research (Tesseur et.al. 2022; Saleh et.al. 2022;

Niederberger & Glanville-Wallis 2019; Hilhorst et. Al. 2021; Martin el.al. 2021; Lokot 2021; Tjitrawati & Romadhona 2023). Hilhorst et al. (2022) is the one other scholarly publication that dives deeper into how CHS plays out on the ground. The thesis uncovers the strengths and weaknesses of the CHS in theory and practice, bridging the gap between academia and practitioners in understanding this regulatory framework.

7.5.4. Safeguarding scholarship from the lens of accountability and power

This thesis significantly enriches the discourse on NGO safeguarding measures, addressing critical gaps in the existing literature. While scholarly focus since the implementation of the UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (SEA) in 2003 has predominantly centred around sexual misconduct by UN personnel and peacekeepers, as documented by Spencer (2005), Kent (2005), Quenivet (2007), Bartels et al. (2021), Connors (2019), and McGill (2014), the narrative began to shift following the Oxfam Haiti sex scandal. The scandal catalysed a broadening of research scope post-2018 to include sexual misconduct by NGO aid workers, prompting a deeper examination of its implications for NGO reputational management (Phillips 2019; Daoust and Dyvik 2020; Clarke 2019), law and regulations (Pascocello 2021; Wang 2021; Carolei 2023); NGO regulations (Afrooz 2020; Deloffre 2021); and the role of digital innovations in safeguarding practices (Westerndorf 2023; Sandvik & Lohne 2021; Peace Research Institute Oslo 2018). This thesis contributes to this expanded inquiry by not only corroborating Arroyo's (2014) assertion that power imbalances within the aid sector foster a culture of impunity conducive to SEA but also advancing the discourse through a nuanced analysis of the forms, spaces, and levels of power encountered by humanitarian actors in specific refugee camp settings.

By situating the research within the broader context of accountability and power dynamics, as explored by Sandvik & Westerndorf (2023), this work not only validates the critical link between power imbalances and the perpetuation of SEA but also enriches the dialogue by dissecting the multifaceted power dynamics at play within humanitarian environments. Through a detailed examination of the specific forms, spaces, and levels of power operative in refugee camps, the thesis uncovers the complex interplay between humanitarian actors and the communities they serve, highlighting how these power

dynamics contribute to the conditions that enable SEA. In doing so, it offers a comprehensive understanding that is essential for devising more effective safeguarding measures, thereby contributing to the ongoing efforts to mitigate SEA within the NGO sector and beyond.

7.6. Key policy contributions

From the perspective of policy, this thesis provides a novel source of empirical evidence highlighting accountability failures within the aid sector. Through a thorough analysis of the accountability standard, the thesis examines its impact on the practical application of safeguarding measures in depth. Leveraging my distinctive positionality as a practitioner, the thesis goes beyond enriching academic insights by providing actionable and context-specific practical implications and recommendations. This is particularly crucial given the intricate and multifaceted nature of the humanitarian landscape. By addressing the gap between theory and practice, the research contributes not only to academic discussions but also offers tangible guidance for policymakers and practitioners navigating the complex terrain of accountability within the realm of safeguarding.

7.6.1. The revision of CHS

My research contributed to the CHS revision process, aligning chronologically with the revision timeline as detailed in the Appendix. This synchronicity ensured that my contributions were both relevant and timely.

The reframing of affected populations

The revised CHS, set for release in March 2024, incorporates a significant terminological update, shifting from ‘communities and people affected by crisis’ to ‘people and communities in situations of crisis and vulnerability.’ It is defined in the revised standard as “the totality of women, men, girls and boys with different needs, vulnerabilities and capacities who are affected by disasters, conflict, poverty or other crises and challenges” (The CHS 2024 Edition). This change reflects a deeper understanding of the complex realities faced by affected populations. The intention to systematically address specific needs and priorities is explicitly framed and addressed, thereby enhancing the capacity of aid providers

for delivering targeted and effective humanitarian intervention. This change mirrors reflection of framing of affected populations as part of WPR exercise of deconstructing the original CHS.

Inclusion of Global South voices in the Consultation Process

The revised consultation methodology now deliberately focuses on addressing power disparities, a strategy influenced by the findings from my research. Throughout the Revision Consultation Process itself, the consultation report (Core Humanitarian Standard 2023) indicates that the voices of vulnerable people and communities, local and national actors, and current users of the Standard were prioritised throughout the different consultation phrases of the process although how they did so is not explained clearly in the report. My continuous engagements with CHS Revision Managers have highlighted the importance of this inclusive methodology, reinforcing the need for transparency in how these voices are integrated and how their contributions shape the final standards.

The revised content of the CHS

To be launched on the 21st March 2024, the revised CHS addresses critical gaps identified in the original CHS, identified as the 'holes of Swiss Cheese' (refer to Chapter 6 section 6.4). It offers a more robust and comprehensive commitments to make these 'holes' smaller and ensure a more effective and responsive humanitarian aid in following ways:

Table 13 How the revised CHS makes the Swiss Cheese holes smaller

Holes of 'Swiss Cheese'	Revised CHS
Lack of refugees' awareness on various types of complaint mechanisms	Commitment 1: Information sharing and communication has moved up to the first commitment as the top priority. This commitment not only emphasizes on information sharing but also participation in line with the priorities and preferences of affected population. Commitment 5 retains its focus solely on complaint mechanisms and stresses the importance of awareness raising of mechanisms.
Exclusion of vulnerable populations	Commitment 1.1 offers clear focus on considerations on diversity, equity and inclusion, with specific attention on the most marginalised groups. Commitment 2.6 focuses on support for affected populations recognising "the diverse capacities, vulnerabilities, needs and risks faced by different groups in the community" (2).

Absence of safe, appropriate spaces for sensitive conversations	Commitment 5.2 includes the implementation of safe, accessible and appropriate ways for all groups in a community to provide feedback, report concerns and complaints in line with recognised good practice. Commitment 8.5 highlights safe, confidential and accessible ways for reporting of misconduct.
Failure to put victims and complainants first	Commitment 4 as a whole highlights provision and access of support for complainants. Commitment 5.5 gives specific attention to appropriate victim/survivor-centred approaches. Commitment 8.5 now specifically has a focus on NGOs' provision of services to protect victims and complainants.
No sanctions and punishment to the abusers	Commitment 8 now has additional focus on whistleblowing and NGOs' responsibility to act in cases of misconduct, specifically to address misconduct in line with recognised good practice.

These revisions collectively represent a significant step towards a more inclusive, safe, and accountable humanitarian aid system.

7.7. Strategic contributions to policy making

Secondly, the contributions of the research detailed in Chapters 5 and 6 extend beyond academic discourse, significantly influencing strategic directions in policy-making arenas. Notably, the findings and policy recommendations have contributed to the strategic discussions and formulation of the Foreign, Commonwealth & Development Office's (FCDO) global safeguarding framework. The relevance and impact of this work are further highlighted by the inclusion of its insights both on the approach paper and review paper of the UK's approach to safeguarding in the aid sector (Independent Commission for Aid Impact 2021; 2022). This engagement illustrates the research's practical contributions to shaping high-level policy decisions.

Moreover, the research has played a significant role in advancing strategic discussions within the Closing the Accountability Gap in PSEAH (Prevention of Sexual Exploitation, Abuse, and Harassment) in the Aid Sector Project. Insights from the research have informed feedback during strategic discussions, as documented in confidential meeting minutes from the CHS Alliance. These discussions have focused on refining the project's implementation and monitoring strategies to ensure they align with the objectives outlined in the Terms of Reference.

These examples highlight the significant impact of the research on shaping policy discussions and strategic decisions within pertinent policy-making platforms. As one of a few pieces across academia and policy to offer practical recommendations on the revised CHS and the use of powercube framework, this research serves as a critical resource for donors and policymakers, guiding the development of frameworks and strategies that address key issues in the humanitarian sector, thereby demonstrating its tangible contributions to enhancing policy and practice in safeguarding and accountability.

7.8. Recommendations: Going beyond CHS and complaint mechanisms

Moving forward requires a proactive approach to bridge the existing accountability gap and transcend the limitations of both the CHS and individual complaint mechanisms. The thesis recognizes the complex, multidimensional nature of power dynamics in displacement context and aims to capitalize on opportunities for improvement. By examining the effectiveness of complaint mechanisms and the efforts of aid providers in preventing and addressing SEA, this section brings attention to the opportunities that exist to fill the gaps identified through this thesis.

The key recommendations below have emerged from the in-depth exploration of the CHS (Chapter 4), the reality of SEA within refugee camps (Chapter 5), and the practical aspects of accountability and complaint mechanisms (Chapter 6). Focused on the scenario of a local female community member from affected populations potentially experiencing exploitation and abuse, as introduced in the thesis's Introduction Chapter, the primary aim is to foster an environment where such individuals feel empowered to report concerns to NGOs. The ensuing policy recommendations are outlined below to facilitate the realization of this goal.

7.8.1. Applying the ‘Swiss cheese’ lens to the revised CHS

This research advocates for the integration of the 'Swiss Cheese' framework into the revised CHS to systematically enhance the accountability mechanisms within humanitarian interventions. The framework’s layers of protection from individual complaint mechanisms symbolize multiple safeguards that, even in the event of a failure within components of one complaint mechanism (represented as a

hole), subsequent mechanisms provide additional opportunities to prevent harm. This analogy highlights the potential of the framework to bolster effectiveness of complaint mechanisms guided by the CHS, ensuring a comprehensive strategy for affected populations to come forward with their concerns.

7.8.2. Shifting power balance using the Powercube and the ‘Swiss Cheese’ model

The incorporation of the Powercube framework, alongside the ‘Swiss Cheese’ model, takes the analysis and recommendation presented above further by scrutinizing the power dynamics that exacerbate vulnerability within the contexts where humanitarian actors operate in. The Powercube framework, with its examination of power in terms of spaces, levels, and forms, combined with the 'Swiss Cheese' model's approach serves as risk mitigation. This combination offers profound insights into transforming power imbalances. Initiatives such as the establishment of committees composed of female community leaders—including representatives from single female-headed households, pregnant women, mothers with children, and families with disabled children—serve to challenge traditional power structures. This allows diverse groups to directly voice their needs, ultimately enhancing downward accountability to affected populations.

The recent innovative initiatives directly aim to shift power dynamics. The Loop, for example, transforms closed spaces by providing platforms like Voice, SMS, WhatsApp, and Facebook, allowing vulnerable communities to share their feedback directly, which opens up previously exclusive decision-making environments. It enhances invited spaces by turning sporadic invitations to participate into regular, meaningful engagement through accessible digital channels. Additionally, the Loop empowers marginalized groups to create recognized and impactful communication spaces, transforming claimed spaces into more influential platforms. This digital platform challenges hidden power by bringing previously overlooked issues to the forefront, ensuring that the concerns of all community members are acknowledged and addressed. Furthermore, by promoting inclusive communication, the Loop shifts invisible power dynamics, fostering norms and values that emphasize greater inclusivity and respect for all voices. Through these changes, the Loop significantly enhances accessibility, inclusivity, and the impact of community voices on decision-making at all levels.

Reallocation of resources, such as UNHCR safeguarding budgets to the national level, would also empower NGOs to better address local challenges, enhancing aid delivery's responsiveness and accountability. This strategic reallocation ensures that resources are more effectively utilized where they are most needed, addressing specific local contexts and dynamics. According to Gaventa (2006), the Powercube framework facilitates an understanding of power relations in different arenas, allowing humanitarian actors to identify and challenge power inequalities that impede effective aid. By integrating this with the 'Swiss Cheese' model, which emphasizes multiple layers of defense against risk, humanitarian interventions can become more robust and comprehensive.

The 'Swiss Cheese' model, originally developed by James Reason (2000) for risk management in complex systems, posits that no single layer of defense is foolproof; rather, it is the alignment of multiple imperfect layers that creates a strong overall defense against risks. In the context of complaint mechanisms and safeguarding within humanitarian interventions, this means implementing a combination of measures such as regular training for staff on safeguarding policies, accessible and anonymous reporting channels, independent investigations, community engagement to build trust in the complaint system, and ongoing monitoring and evaluation to identify and address any gaps or weaknesses in the safeguarding process, all of which work together to create a comprehensive and effective protective environment.

7.8.3. Mandatory safeguarding budgets for all programmes

To build upon the initial recommendation and ensure the effective implementation of enhanced complaint mechanisms, it is crucial to allocate sufficient resources. To effectively minimize the holes in the 'Swiss Cheese', it is essential to enhance safeguarding budgets. Such an increase would support the reinforcement of safeguarding policies, the allocation of female personnel with a background in safeguarding for household visits, the provision of phone access and hotlines in local languages, the expansion of project budgets for awareness workshops, and the creation of secure spaces for

complainants and survivors. Additionally, it is vital to allocate resources for managing complaints and providing tailored support for vulnerable groups, including psychosocial, legal, and counselling services for victims. Activities particularly aimed at empowering female refugees are likely to contribute to tackling behaviours and norms that are embedded as invisible power and grounded in gendered and colonial power hierarchies inherent within the sector.

Due to the limited resourcing capacity of individual NGOs, it is recommended that institutional donors and governments allocate mandatory budget dedicated for safeguarding in every program and projects. Ensuring NGOs have resources for safeguarding from the beginning of interventions promotes a proactive approach, building a strong infrastructure to prevent, detect, and respond to exploitation and abuse. This approach underlines safeguarding as essential, emphasizing the sector's commitment to protect the vulnerable and ensuring funding is flexible to meet a wide range of needs.

Acknowledging the diverse stages of the safeguarding journey within each agency, it is imperative that donors afford a degree of flexibility in the utilization of safeguarding budgets by organizations. This flexibility ensures that organizations can tailor their safeguarding initiatives according to their specific context and requirements, fostering a more effective approach to safeguarding across the spectrum of global humanitarian interventions. For this to remain systematic, donors are recommended to allocate fixed percentage of budgets solely for safeguarding for every programme.

7.8.4. The creation of an independent ombudsman for accountability and oversight

Last but not least, safeguarding failures evidenced in the thesis indicate that internal accountability and safeguarding measures developed within the aid sector have not adequately responded to the reality of accountability deficits. Not only was the widespread scale of SEA exposed through the research, but also under-reporting of SEA cases was evident due to barriers such as lack of confidence in aid providers to follow through cases and achieve justice for victims. To bridge these substantial accountability gaps on a global scale, the aid sector should establish an external and independent authority.

To address the gap 5 – no sanction and punishment to the perpetrators – the thesis strongly advocates for the establishment of external, independent ombudsman. This recommendation stems from an in-

depth analysis of the root causes of under-reporting, particularly the imbalances of visible, hidden and invisible power that intersect among the key humanitarian actors – the host state, UNHCR, and NGOs (see more details on Chapter 6 section 6.4). Drawing on the International Ombudsman for Humanitarian and Development Aid proposed by the Dutch government in 2018 (Carolei 2021; Hilhorst et.al. 2018), this entity should maintain complete independence from any affiliated NGOs and international organizations, reinforcing on increased trust and confidence from affected populations on objective and confidential handling and management of SEA cases. Its primary role would involve receiving and referring complaint cases to the appropriate NGOs, thereby reinforcing the neutrality, impartiality, and objectivity of the complaint mechanisms. This body must also possess the necessary power and authority to recommend, and potentially enforce legal actions and sanctions on individual perpetrators as deemed essential for ensuring accountability and addressing safeguarding concerns effectively. The external body would collaborate with the Charity Commission which possesses authority to revoke the charity status against the aid organisations that perpetrators are employed with and issue disciplinary sanctions in case of misconduct (Carolei 2023).

This approach aligns with existing literature that highlights the potential benefits of an international NGO ombudsman and builds upon discussions among governments, institutional donors, accountability scholars, criminology departments within academic institutions, and thinktanks (MacLeod 2018; Carolei 2021; Sanvik and Westerndorf 2023). Initiatives include the International Sexual Exploitation of Children: Action project that seeks to identify perpetrators through DNA technology, Project Soteria that enhances information sharing between the sector and law enforcement, Interpol and the Misconduct Disclosure Scheme that promote safe recruitment to keep perpetrators from being re-hired within the sector, all of which contribute to sectoral efforts to create a more robust regulatory and accountability framework for NGOs. By instituting an independent ombudsman, the aid sector can make significant strides toward rectifying the current accountability deficits, thereby ensuring that safeguarding failures are addressed with the seriousness and diligence they deserve.

7.9. Maximising the impact by bridging research, policy and practice

In the evolving landscape of NGO accountability, there is a growing emphasis on academic scholarship led by practitioner-researchers. Building on the trend, this research has primarily focused on downward accountability through case studies of specific NGOs, with in-depth attention given to safeguarding and the Core Humanitarian Standard (CHS). Concurrently, practitioner-researchers are increasingly diving into safeguarding literature, reflecting a surge in reports by NGOs and consultants. This surge indicates heightened interest among practitioners and emphasizes the inadequate attention given to the topic by academics.

My unique position as a practitioner-researcher, coupled with an extensive professional network, has allowed me to conduct research that effectively bridges these two domains. Leveraging a snowball sampling approach and building rapport with key informants whom I have worked with in the past, I explored the intricacies of safeguarding, a highly sensitive subject. This approach represents the distinctive contribution of my thesis, bringing together research and knowledge from both scholars and practitioners. My operational frontline experience, during which time I have conceptualized and applied standards with affected populations in relevant contexts, further strengthens the thesis.

7.10. Conclusion: Empowering voices and transforming accountability

In conclusion, this thesis has made significant contributions to the understanding of SEA and accountability in humanitarian, displacement contexts, presenting critical insights and actionable recommendations. It exposes significant safeguarding failures within refugee camps, revealing systemic inadequacies in existing complaint mechanisms. However, it also identifies substantial opportunities for reinforcing collective efforts to transform the power asymmetries that perpetuate abuse across various stakeholders.

A central argument is the necessity of shifting the narrative from viewing affected populations as passive recipients of aid to recognizing them as active participants in shaping humanitarian responses. This is essential for fostering an environment where individuals feel safe to report SEA concerns and trust that their complaints will be addressed with dignity and respect. Empowering affected populations

to participate actively in safeguarding processes challenges entrenched power dynamics and promotes a more equitable humanitarian ecosystem.

The revised CHS, with its explicit focus on providing diverse, accessible complaint mechanisms and thereby addressing power dynamics, presents a significant step towards realizing a more accountable and safer humanitarian ecosystem. This approach stresses the importance of shifting the narrative from one that views affected populations as passive recipients of aid to active participants in shaping the humanitarian response. This shift is crucial for fostering an environment where individuals feel safe to report SEA concerns and trust that their concerns will be addressed with dignity and respect.

Moving beyond policy development to implementation and enforcement, the thesis, therefore, calls for a renewed commitment to accountability, where safeguarding practices are not only theoretical constructs but lived realities that uphold the dignity and rights of affected populations. This transformation requires collective and individual actions guided by the CHS principles, ensuring that humanitarian interventions are characterized by empowerment, participation, and justice for survivors of SEA. This commitment must be unwavering, grounded in continuous efforts to scrutinize, refine, and implement safeguarding measures that truly protect and empower those in need, turning policy into a lived reality that upholds the dignity of affected populations.

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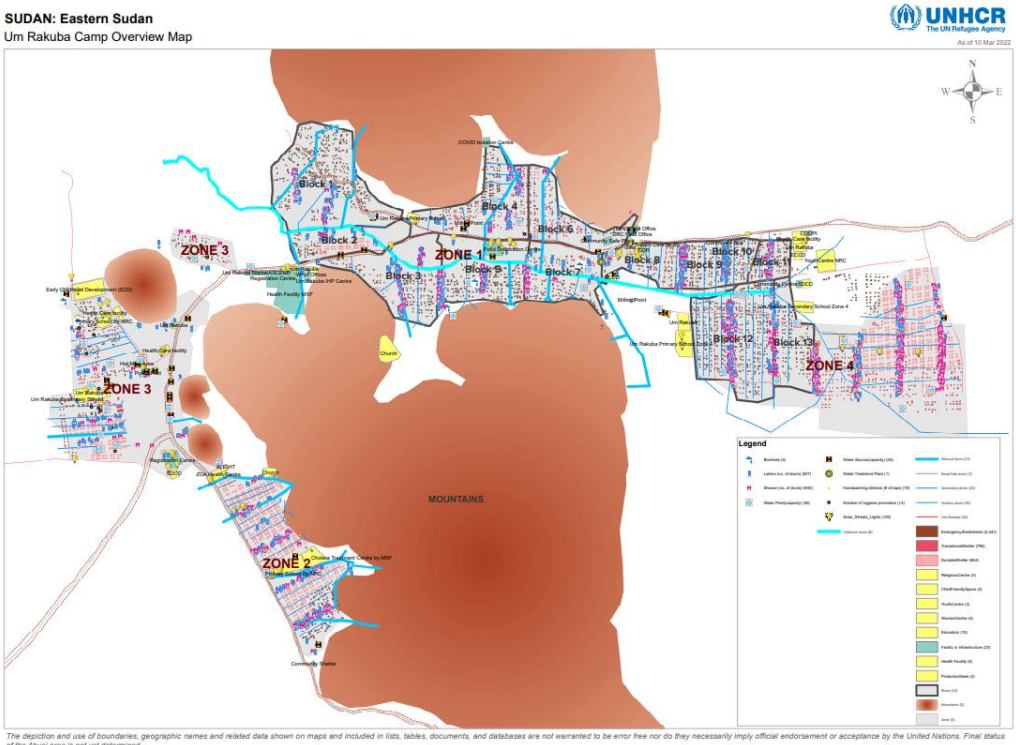
Appendices

Appendix A. Overview Map of Um Rakuba Camp and Tunaydbah Settlement



Source: UNHCR (2022c). Ethiopia Emergency Situation Profile – Um Rakuba Refugee Camp

Source: UNHCR (2022d). Ethiopia Emergency Situation Profile – Tunaydbah Settlement

Appendix B. List of Interviewees

Table 14 List of interviewees for Stage 1

	Name	Position	Gender	Interview Dates
A1	Pierre Hauselmann	HQAI Executive Director; CHS Writing Group	Male	12/02/2021
A2	Claire Goudsmit	HQAI Senior Quality Assurance Advisor; CHS verification development	Female	18/02/2021
A3	Lucy Heaven	Safeguarding expert; CHSA PSEA Handbook development & revision	Female	18/02/2021
A4	Monica Blagsco	Former DEC Programme Director; HAP consultation leads 2007 and 2010	Female	23/02/2021
A5	Anonymous	HQAI auditor	Female	24/02/2021
A6	Marian-Casey	Former HAP Executive Director in 2014; former CDAC Executive Director	Female	25/02/2021
A7	Anonymous	Aid worker	Male	04/03/2021
A8	Kate Halff	Head of IFRC & Chair/President of HQAI Board now; Executive Secretary of SCHR 2014	Female	06/03/2021
A9	Anonymous	DANIDA Department for Humanitarian Action	Female	08/03/2021
A10	Anonymous	Aid worker	Female	09/03/2021
A11	Catherine Skehan	Former Christian Aid and CAFOD Accountability Advisor	Female	10/03/2021
A12	Annie Devonport	Former DEC Programme Director, former HQAI senior auditor	Female	11/03/2021
A13	Anonymous	National NGO director	Male	13/03/2021
A14	Aninia Nagid	Former Sphere Policy and Practice Manager; former CHS Revision Manager	Female	15/03/2021
A15	Jo Thomson	Safeguarding expert, HQAI auditor	Female	16/03/2021
A16	Anonymous	Former head of Sub Office UNHCR Syria	Female	16/03/2021
A17	Anonymous	Aid worker	Male	18/03/2021
A18	Anonymous	Aid worker	Male	18/03/2021
A19	Anonymous	Aid worker	Female	23/03/2021

A20	Anonymous	Former HAP Executive Director	Female	23/03/2021
A21	Nigel Timmins	Oxfam	Male	24/03/2021
A22	Bonnaventure Sokpoh	CHS Alliance Head of Policy, Advocacy	Male	25/03/2021
A23	Anonymous	Oxfam	Male	18/04/2021
A24	Anonymous	Islamic Relief Worldwide	Male	20/04/2021
A25	Nick Guttman	Oxfam	Male	22/04/2021
A26	Anonymous	Christian Aid	Female	11/05/2021
A27	Anonymous	Independent consultant	Female	20/05/2021
A28	Anonymous	Aid worker	Male	24/05/2021
A29	Manisha Thomas	Independent consultant on complaint mechanism	Female	26/05/2021
A30	Anonymous	Independent consultant	Female	07/06/2021
A31	Tanya Wood	CHS Alliance Executive Director	Female	10/06/2021
A32	Anonymous	Aid worker	Female	21/06/2021
A33	Anonymous	Aid worker	Male	10/07/2021
A34	Anonymous	Aid worker	Female	13/09/2021

Table 15 List of Aid worker participants n Sudan

	Name	Category	Gender	Interview Dates
B1	Anonymous	International NGO aid worker based in Khartoum	Male	03/02/2022
B2	Anonymous	International NGO aid worker based in Khartoum	Male	03/02/2022
B3	Anonymous	International NGO aid worker based in Khartoum	Male	08/02/2022
B4	Anonymous	International NGO aid worker based in Gadaref	Male	08/02/2022
B5	Aisha Shatta	IOM Sudan based in Khartoum	Female	10/02/2022
B6	Anonymous	International NGO aid worker based in Gadaref	Female	14/02/2022
B7	Anonymous	International NGO aid worker based in Gadaref	Male	16/02/2022
B8	Anonymous	International NGO aid worker based in Khartoum	Male	17/02/2022
B9	Anonymous	NGO aid worker based in Gadaref	Male	01/03/2022
B10	Anonymous	International NGO aid worker based in Khartoum	Male	03/03/2022

B11	Anonymous	International NGO aid worker based in Khartoum	Male	07/03/2022
B12	Anonymous	International NGO aid worker based in Sudan	Female	07/03/2022
B13	Anonymous	International NGO aid worker based in Gadaref	Female	14/03/2022
B14	Anonymous	International NGO aid worker based in Gadaref	Male	16/03/2022
B15	Anonymous	International NGO aid worker based in Gadaref	Male	17/03/2022
B16	Anonymous	NGO aid worker based in Gadaref	Male	17/03/2022
B17	Anonymous	UN staff based in Khartoum	Female	18/03/2022
B18	Anonymous	International NGO aid worker based in Gadaref	Male	21/03/2022
B19	Anonymous	National NGO aid worker based in Gadaref	Male	24/03/2022
B20	Anonymous	National NGO aid worker based in Gadaref	Male	25/03/2022
B21	Anonymous	National NGO aid worker based in Gadaref	Female	25/03/2022
B22	Anonymous	UN staff based in Khartoum	Female	28/03/2022
B23	Anonymous	NGO aid worker based in Gadaref	Female	29/03/2022
B24	Anonymous	International NGO aid worker based in Gadaref	Male	29/03/2022
B25	Anonymous	National NGO aid worker based in Gadaref	Female	30/03/2022
B26	Anonymous	National NGO aid worker based in Gadaref	Male	05/04/2022
B27	Anonymous	International NGO aid worker based in Khartoum	Male	05/04/2022
B28	Anonymous	National NGO aid worker based in Gadaref	Female	03/08/2022
B29	Anonymous	UN staff based in Khartoum	Male	05/08/2022
B30	Anonymous	International NGO aid worker based in Gadaref	Female	09/09/2022
B31	Anonymous	National NGO aid worker based in Gadaref	Male	11/09/2022

Table 16 List of refugee participants in Um Rakuba Camp and Tunaydbah Settlement

	Name	Position	Gender	Interview Dates
C1	Anonymous	Refugee	Female	29/03/2022
C2	Anonymous	Refugee	Male	15/02/2022
C3	Anonymous	Refugee	Male	04/04/2022
C4	Anonymous	Refugee	Female	05/04/2022
C5	Anonymous	Refugee	Female	02/05/2022
C6	Anonymous	Refugee	Male	13/05/2022
C7	Anonymous	Refugee	Male	09/06/2022
C8	Anonymous	Refugee	Male	09/06/2022
C9	Anonymous	Refugee	Male	10/06/2022
C10	Anonymous	Refugee	Male	21/06/2022
C11	Anonymous	Refugee	Female	21/06/2022
C12	Anonymous	Refugee	Male	20/10/2022
C13	Anonymous	Refugee	Female	25/10/2022
C14	Anonymous	Refugee	Female	02/11/2022

Table 17 List of safeguarding specialists participated in the interviews

	Name	Position	Gender	Interview Dates
D1	Anonymous	Consultant	Female	17/02/2022
D2	Anonymous	Consultant	Female	02/03/2022
D3	Anonymous	Consultant	Female	10/03/2022
D4	Birgit Spiewok	Consultant	Female	17/03/2022
D5	Anonymous	Anonymous	Male	17/03/2022
D6	Anonymous	Consultant	Female	18/03/2022
D7	Anonymous	Consultant	Male	22/03/2022
D8	Anonymous	Consultant	Female	22/03/2022
D9	Anonymous	Consultant	Female	29/03/2022
D10	Nabila Nasir	Red Cross whistleblower	Female	04/04/2022
D11	Martina Brostrom	UNAID whistleblower	Female	03/05/2022
D12	Anonymous	Consultant	Male	05/05/2022