Naming Structural Harm in International Aid Organizations:
Institutional Responses to Dissent and Whistleblowing

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Introduction and Overview

International organizations—bilateral, multilateral, and non-governmental—along with partner and implementing organizations, have internal oversight policies and protocols for reporting fraud, abuse, and other forms of misconduct. The degree to which these channels are used or remedy problems or grievances varies across institutions and countries of operation. Many of these same organizations subscribe to and operate under the *Do No Harm* principle, particularly those involved in humanitarian, emergency, conflict, or security related operations. Harm can be interpreted broadly or narrowly, directly or indirectly, historically or as a projected consequence of some future action. Harm can be as specific as negligence at a single site and as broad as questions of sovereignty and structural violence. What constitutes harm, and what principled dissent accompanies it, is highly contested. Ambiguity, abstraction, and differing world views render specific technical or administrative channels for naming and addressing harm virtually impossible.

The 2018 revelations of widespread solicitation and exploitation of sex workers among Oxfam staff in Haiti amidst earthquake relief operations gained rapid and widespread global attention.[1] A series of events that only became scandalized seven years after they occurred, in the wake of the #metoo movement, caused a financial fallout for Oxfam. The charity announced nearly £16m in program cuts and layoffs.[2] While media stories sought to explain the depth of a cover-up and the paradoxical nature of sexual exploitation by a humanitarian organization during one of the most extreme humanitarian emergencies of the 21st century, to many Haitian civilians and aid workers worldwide, the story was less than exceptional. As one aid worker put it, "You stop thinking about it not because it doesn't bother you, but you stop feeling enraged because it's so common. [In general], there's no way to define good or bad practice in terms of *Do No Harm*.[3]" Global attention on Oxfam alone obscured questions about the broader cultural, economic, and operational conditions in humanitarian [and often development] aid contexts which enables, and often ignores, this behavior.

In the context of broader aid economies, the volume of small and large organizations alike operating in conflict and emergency situations has grown exponentially in the past 25 years, raising broader questions about where and how accountability relationships have emerged, in whose interest, and in what directions. Short of a #metoo moment, where do Oxfam Haiti stories end and how common are they? Are they the product of 'bad apples' or built in features of current aid architecture?

According to Eyal Weizman, conflict zones have seen an especially rapid increase in the presence of international organizations,[4] "while in 1980 there were about 40 NGOs dealing with the Ethiopian famine, a decade later 250 were operating during the Yugoslavian war; by 2004, 2,500 were involved in Afghanistan.[5]" Referring to the rate of increase in NGOs in the Middle East, Nahla Abdo points to a jump from, "…an estimated 175,000 in 1995 to about 225,000 in 2003—[which] has raised a number of issues and concerns among various scholars.[6]" The additional increase since 2003 is likely significant.[7] As one interviewee pointed out, "Younger Palestinians don't remember a time before donors." Even if numerically quantifiable, the vast landscape of international non-governmental organizations, multilateral organizations, bilateral organizations, and the network of their grant partners and recipients is, at best,

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[1] Gayle, Damien. "Timeline: Oxfam sexual exploitation scandal in Haiti," *The Guardian*, 15 June 2018.
[2] Hopkins, Nick. "Oxfam to axe jobs and aid programmes in £16m cuts after scandal." The Guardian, 15 June 2018.
[3] – JA
[4] International organizations here refers to any organization that receives even partial funding from or through international organizations, which may include small non-profit organizations based in one country or large multilateral organizations based in dozens of countries.
[5] Weizman, Eyal. *The Least of All Possible Evils: Humanitarian Violence from Arendt to Gaza*, Verso Books, 2012.
[6] Abdo, Nahla, 'Imperialism, the state, and NGOs: Middle Eastern contexts and contestations', in *Comparative Studies of South Asia, Africa and the Middle East* (Vol. 30, no. 2, 2010), pp. 238–49 (p. 245). Her source is: United Nations Development Fund for Women (UNIFEM), *Progress of Arab Women 2004* (Amman, Jordan: UNIFEM, Arab States Regional Office, 2004), www.unifem.org/materials/ item- detail.hp?ProductD=89. She does not specify which countries is/are'n't included in the lable of "the Middle East."
[7] The jump from international organizations to NGOs in this section is not a conflation of the two, but rather an assumption that at least partial funding for a vast number of these NGOs is derived from bilateral, multilateral or other IO sources, *de facto* incorporating them into a broader IO political economy.

partially understood. Their rapid proliferation in the post-Cold War period render a need for examination of changing dynamics in recent years, in order to understand the culture of daily operations within and across organizations, their impact on political, social, and economic life in host cities or countries, and ask how these norms are produced and on whose terms.

Given the rapid growth and ongoing presence of a growing network of international non-governmental, and semi-governmental organizations—this research examines a subset of internal accountability dynamics within and across organizations. It focuses specifically on the role of internal dissenters and whistleblowers, and organizational responses to them, to better understand how organizations operate internally and how accusations of harm are handled. This report is part of a longer-term research project focused on:

1. Understanding the role of development and humanitarian actors as political actors in complex political and economic contexts, emergencies or otherwise;
2. Clarifying the tradeoffs made in and by aid actors through the full cycle of humanitarian and development operations, and to;
3. Broadening the scope of problems addressed to include sector wide factors that enable and reproduce conditions of inequality in which humanitarian problem-solution narratives gain currency
4. Better understand how existing concepts of dissent and whistleblowing, as is understood within the context of states and nationally bound legal jurisdictions, do and do not apply to international organizations operating in and through aid contexts.

While it cannot address each of these goals in full, or even at all, in this paper, the hope is that the analysis which follows contributes to ongoing research and reporting on related topics.

Three core questions guide the following report:

(1) How do internal dissenters and whistleblowers name and seek to mitigate organizational dynamics of harm, violence, or inequality—structural or individual—that affect host populations?
(2) How do organizations respond to dissent and whistleblowing along these lines?
(3) Are there common patterns and strategies taken by dissenters, and by institutions in responding, across organizations, countries, and context?

More broadly, the aim of this paper is not to identify ways to improve humanitarian aid delivery or practice, development planning our outcomes. Nor is it to frame findings in terms of good aid or bad aid. It is to analyze and understand the ways in which international organizations, operating in a variety of governance capacities in conceiving and implementing aid programs —as semi-governmental, non-governmental, private, civil society, and/or public-sector organizations—respond to internal dissent which questions norms, names wrongdoing, or names structural harm which organizations, infrastructure, or projects may be contributing to or perpetuating. In better understanding why and how insiders dissent, along with how organizations respond, the aim is to bring more clarity to internal operations, the politics of information sharing, and the everyday practice of decision-making, representation, and accountability. In sharpening insight on these topics, researchers, practitioners, and policy-makers can better analyze the politics and power dynamics within and across the aid industry.

Rationale for Focusing on Insider-Dissenters

1. Why go beyond whistleblowing to include dissent?

In its *2018 Best Practice Guide for Whistleblowing Legislation*[8], Transparency International provides two definitions of whistleblowing. The first is a composite definition more commonly found in various state-level whistleblower protection legislation, along with definitions provided by and found on advocacy or legal aid websites: "the disclosure of information related to corrupt, illegal, fraudulent or hazardous activities being committed in or by public or private sector organizations—to individuals or entities believed to be able to effect action." For the purpose and question of understanding the ways in which international organizations respond to internal claims of wrongdoing, two central challenges emerge with this definition.

The first relates to the question of 'public interest'. International organizations are staffed by a combination of expatriates and nationals. Their funding sources often come from other countries and their declared constituencies are populations living in countries of operation. Which public, then, is the public of interest? Is it the public of the largest donor countries? The public of the country where expatriates are from? The public of the host country? Some combination of all three? Is it a global public? Is it a public of political elites? These abstract questions matter since jurisdiction, investigations, and oversight may be prompted formally or informally to institutions belonging to any of these publics, although several multilateral organizations including the United Nations, as supranational organizations, rely on their own internal policies, protocols, and jurisdiction. This dilemma is well-documented in other research, which posits that accountability statements are oriented toward host populations and accountability practices are oriented toward funding entities.

The second challenge with this definition is that wrongdoing, as named here, is weighted toward fraudulent action or corruption, while including more general references to other kinds of wrongdoing. For international organizations providing public services, intervening in ongoing conflicts, selecting criteria for post-disaster receipt of housing or baby formula, providing policy planning and resources to local governments, and making gendered determinations of space, trauma, or economic opportunity, the full range of questions related social, political, and economic harm or wrongdoing, is drastically limited by prioritizing fraud and corruption as the most specific [and egregious] examples of wrongdoing. Beyond principle, the definitions provided often correspond to associated channels for reporting, the possibility for remedying stated grievances or harm, and the degree to which external pressure is invoked to demand change or accountability. The entire process flows from what is thought to count, and what isn't.

This definition further implicitly assumes that existing rule arrangements are fair, just, or not subject to claims of violating the public's interest. However, where pay differentials are up to 900% between expatriates and nationals or where humanitarian organizations are requested to safeguard human rights during forced population transfers, one need not be a specialist to question the premise of fairness or justice in the rules themselves.[9] At times, it is precisely the norms and rules which sometimes earn

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[8] Terracol, Marie."A Best Practice Guide for Whistleblowing Legislation," *Transparency International*. 1 Mar 2018.
[9] Stuart C Carr and Ishbel McWha-Hermann, "Expat wages up to 900% higher than for local employees, research shows," The Guardian, 20 April 2016, and; Kingsley, Patrick."Refugee crisis: key aid agencies refuse any role in 'mass expulsion,'" The Guardian, 23 March 2016.

significant criticism for their facilitation of unequal power dynamics or inequality. As such, whistleblowing cannot adequately address these grievances as declarations of wrongdoing. None of these examples constituted whistleblowing

For these two reasons, among others, the term 'whistleblower' creates a vastly uneven playing field for naming, let alone reporting, a wide range of grievances, problematic norms, direct or structural forms of harm.

The TI report goes on to provide an expanded definition of whistleblowing, presumably to address some of the challenges and shortcomings of the previous definition:

> "whistleblowing is the disclosure or reporting of wrongdoing, including but not limited to corruption; criminal offences; breaches of legal obligation; miscarriages of justice; specific dangers to public health, safety or the environment; abuse of authority; unauthorized use of public funds or property; grows waste or mismanagement, conflict of interest, and acts to cover up any of these.[10]"

While this definition signals a more malleable understanding of harm, wrongdoing, and violations of public trust or interest, and those who play a role in it, it remains that systemic issues still may not have a place. what falls outside this definition may not count . Corresponding to specific channels for reporting each, with or without protection, this limited definition can serve to silence those who recognize systemic issues, X.[11] More broadly, in an industry where organizations partner with public, private, and non-government in the provision of critical public services, and in intervening in both vulnerable and violent situations, professionally defined forms of wrongdoing, while still extremely risky and difficult to address, inadvertently limit politically defined forms of wrongdoing.

Throughout this report, the term dissent and dissenter are used interchangeably with whistleblowing and whistleblower. This conflation is not to blur the conceptual and legal lines between the two, but to widen the scope of acts and observations aid insiders raise issue with, some of which are easily namable as wrongdoing, and many of which are not. The form it takes may include a range of actions, statements, and activities including whistleblowing, conscientious objection, or raising questions related to harmful outcomes associated with an organization's work or mere presence. It does not cover reports of rule-breaking more generally.

The word dissenter is also deployed here to highlight the paradoxes of representation, constituency, professional obligation, as aid workers are often described in role and function as playing a technical role in service delivery or program management. Describing dissent repoliticizes what is often described in apolitical terms.

Focusing on aid insiders raises one final, and central, oversight of this paper: *Why focus on insiders, often short-term expatriates in a country, rather than civilians and host populations, all long-term nationals and residents of a country?*

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[10] Terracol, Marie. "A Best Practice Guide for Whistleblowing Legislation," *Transparency International*. 1 Mar 2018, p. 7

2. Why focus on insiders and not host populations themselves?

This report is largely focused on people working inside the humanitarian and development system, hereafter called 'insiders,' 'interveners,' and 'dissenters' interchangeably. Aid organizations—and the state, multilateral, and private donors that fund and partner with them—name local populations as primary constituencies. In reality, as Tom Kirk states in his review of *Why We Lie About Aid: Development and the Messy Politics of Change*, "aid currently has no permanent electoral constituency past those that work in the sector and a small number of committed idealists.[12]" While international aid and development organizations lack clear constituencies in the countries where they operate in terms of accountability, there often *are* clear accountability protocols and pathways oriented toward donor states, headquarter states, and tax-paying publics in both. Aid insiders appear privy to the intermixing of politics and power dynamics within both, and the role of international organizations in implementing, mediating or shaping them. Further, the perspective of day-to-day aid operations surfaces a set of norms, a political economy, and a set of political realities not fully covered by state-to-state relations or civilian-state relations. These projects, programs, and organizations individually and collectively comprise an additional layer of local, regional, national, and transnational politics. As Raymond Apthorpe describes in *Aidland*, "aid workers inhabit a separate world with is own time, space, and economics."'[13] Severine Autissere builds on this research in *Peaceland*, in which she analyzes the narratives, practices, and habits—a set of informal rules, cultural, social, and professional routines—of peacekeepers and peacekeeping operations across conflicts, countries, and organizations. Civilian populations are most affected by these every day norms and their long-term outcomes, however, aid insiders are most privy to seeing them in their various manifestations.

A lack of focus on questions of civilian dissent, critique, or collective action regarding aid interventions may falsely imply there is little research on these questions, and in fact, quite the opposite is true. There is no shortage of examples, going back as far as anti-colonial struggles and continuing into the present of efforts to dissent and push back against specific projects or more abstract political dynamics enabled through and by international organizations' policies. There is a long and growing list, from every country and continent in the world, although analyses tend toward country or case specific analyses.

The long-term goal of employing the term 'dissent' beyond 'whistleblowing' here is precisely to develop a platform for research that centers on civilian actions and responses to aid norms or power structures that are present in daily life, policies, institutions, or otherwise.

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[12] Kirk, Tom. "Book Review: Why We Lie About Aid by Pablo Yanguas," From Poverty to Power, Oxfam Blogs. 2 May 2018. Original book citation is, Yanguas , Pablo. *Why We Lie About Aid: Development and the Messy Politics of Change*. Zed Books, 2018.
[13] Apthorpe 2005; and Fechter and Hindman 2011a, p. 13.

Methodology

Building on desk research in several areas listed below, twenty-four semi-structured, original, interviews have also been conducted with aid insiders, associated researchers, journalists, and legal experts. Interviewee profiles include: past or current whistleblowers, ethics and legal officers, journalists, researchers, and practitioners (who have dissented by not been deemed whistleblowers). Interviewees generously explained processes, experiences, and expertise in detail. All interviewees will remain anonymous due to fear of retaliation among practitioners.

As an ongoing, long-term project, several research questions frame the direction of findings shared in this paper. Areas highlighted in bold are the primary questions used to structure interviews and findings for the following analysis.

Core research questions:

1. How is dissent different from whistleblowing in the context of organizational decision-making in development or humanitarian aid, if at all?

2. At what levels of humanitarian and development aid is harm cited as a reason for dissent or whistleblowing by organizational insiders? Are some types of harm named more often than others? Who is most or least likely to raise concern, dissent, or blow the whistle in relation to different types of harm?

3. Within organizations, what institutional mechanisms exist for reporting different types of harm through organizational channels designed for whistleblowers? What external mechanisms exist for reporting these concerns, including national and international media?

4. **Calculating dissent: How do insiders weigh the decision to speak up?**

5. **How do organizations and institutions respond to staff that dissent on grounds of structural harm?**

The **first section** analyzes and explains the calculus and strategies undertaken by whistleblowers and dissenters.

The **second section** analyzes a series of institutional responses that appear to characterize organizational responses to dissent and whistleblowing, in three ways: actions taken in response to individual dissenters, administrative realities that explain or frame suppression of dissent, and organizational narratives which rationalize or explain responses as justified.

The **third and final section** names structural barriers to independent oversight or checks and balances that focus accountability mechanisms on the interests of host populations.

Throughout this research, while interviewees come from a range of multilateral, bilateral, transnational private voluntary, and membership-funded organizations, there is no distinction drawn between them, the type of issues reported, or the profile of dissenters and/or whistleblowers. Much further research is needed to draw out these causal relationships. As such, analysis provided is descriptive, aiming to surface the most common trends and behaviors, regardless of organization or context, drawing on Autessere's ethnography model of analyzing habits, narratives, and practices of peacekeeping intervenors and peacekeeping organizations.

Paired with 24 original interviews, this research draws on four areas of literature to inform analytical frame and interview design, including: (1) the political economy of international organizations; (2) whistleblowing and public interest; (3) ethnographies and organizational culture in international aid organizations; and (4) critical humanitarian and development studies.

Political economy of international organizations		Contrary to the prevailing theories that state actors are the primary drivers of IO behavior, this literature informs the segmentation of interests and incentives within IOs as driven by a combination of national politicians, IO bureaucrats and managers, and transnational civilian interest groups interest groups, and tax-paying, voters in donor countries.[14]
Whistleblowing and public interest		Whistleblower literature frames questions related to which publics of interest, and which legal and procedural jurisdictions come into conflict with one another in trying to establish whistleblower protection norms. This literature is drawn upon heavily throughout this research to highlight problems and dilemmas of designing whistleblower protection protocols, in addition to linking them to regulatory changes as a result. Whistleblowing literature additionally provides useful analytical tools with respect to checks and balances in holding powerful actors accountable. In this research, it is used to frames layers of organizational complexity that accompany dissent and whistleblowing claims in international organizations which do not occur or arise within states or private companies.
Ethnographies and organizational culture in international aid organizations		For this report, the literature on institutional ethnography in aid contexts is primarily grounded in Autessere's approach in *Peaceland* to analyze and document practices, habits, and narratives of intervenors. Additional literature for this section draws on the work of *Catherine Weaver's The Hypocrisy Trap*, which describes the difficulties of resolving hypocrisy in large complex international organizations, focused on the World Bank. This research assumes that both competing institutional and individual incentives, as well as unpredictable events, frame the context in which individual dissenters or whistleblowers are engaged.
Critical humanitarian and development studies		Literature drawn upon here includes post-colonial theories of development, most centrally, Samir Amin's concept of the Center and the Periphery and Fassin and Pandolfini's book on Contemporary States of Emergency. Amin's theory, developed to reframe debates of economic development in the Global South during decolonization, continues to be relevant for examining conditions of structural inequality are in/directly reproduced in and through international organizational norms, policies, and reporting practices. The latter draws on the notion that humanitarian expansion implies a permanent state of exception indistinguishable in form from other types of martial law, albeit different in substance of practice.

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[14] Dreher, Axel and Valentin Lang, "The Political Economy of International Organizations." CESifo Working Paper No. 6077. September 2016.

Tradeoffs, Paradoxes, and Challenges

Below are some of the limitations, risks, and challenges that frame this initial stage of research. As additional segments of research are conducted, risks and challenges will be mitigated, while limitations will be explored and discussed at length. Each remains an active, open question throughout.

There is an active tradeoff between focusing in depth on a single institution or sector, and alternatively, seeking to find more generalized patterns that apply more broadly. At this initial stage, research covers the latter, drawing on 24 original interviews to gain initial insight, and to provide the substance and content for longer-term research and methodological framing. A grassroots organization receiving 27% of its overall budget from the Norwegian Government is going to have vastly different knowledge of context and political stake than a 3-month long consultation with a national government by an international humanitarian advising team or a UN peacekeeping force deployed for an indeterminate amount of time in a country seized by war and a public health crisis. Cataloguing these differences and determining the extent to which dissent and whistleblowing are dealt with according to those differences would be an important next step for future research. However, in this report, little to no distinction or separation between different types of international organizations including: multilateral, bilateral, private voluntary, for-profit development sub-contractors, and local partner NGOs among other important distinctions. The goal is to bring clarity to how internal dissent is treated, most often from an administrative perspective.

Similarly, an absence of specific context renders broader analysis and discussion of political, economic, and social tradeoffs impossible. For example, when IO decision-makers rationalize gradations of harm as necessary to avoid greater harm, or to advance a host of benefits that outweigh the particular harm named, those go unnamed in this research. In other words, if it is politically expedient or necessary to take a certain decision—at least in the eyes of a decision-maker—there is no space or discussion to analyze those tradeoffs and considerations here.

One associated, and significant, risk of decontextualizing aid politics, actors, and decisions, is the blanket use of these findings by authoritarian or repressive regimes to reinforce restrictions on all civil society activity. The accusation that civil society, media, or activist organizations are agents of foreign interests is not entirely ahistorical, and nevertheless, has been weaponized in contemporary politics by several authoritarian regimes. Legacies of post-colonial and Cold War proxy arrangements render ongoing discomfort about the relationship between local civil society groups and international bodies or resources. However, in recent years, several governments have amplified these narratives to crack down on all civic and political opposition, including media or human rights groups. The Governments of Egypt and Hungary are two of many examples. While this research aims to examine the presence of dissent within and across international aid organizations, particularly those grounded in claims of direct or structural harm, there is a risk that its generality may be coopted by regimes to legitimize widespread crackdowns.

Finally, a variety of challenges related to the conceptual use of whistleblowing over other terms has already been addressed. An additional point that must be reinforced is the risk posed by focusing on existing IO accountability mechanisms, and breaches of them, as potentially exacerbating dynamics of structural inequality. If the normative frame for establishing accountability protocols is top-down, with little to no civilian representation, then seeking to uphold those protocols as just is ineffective at best, and harmful beyond that. Additionally, most existing oversight protocols provide for remedying problems at the level of an individual manager, project, or country office, while broader norms remain. Finally, centering grievance protocols and possible remedies on aid insiders reinforces the invisibility of many civilian populations who hold both grievances and optimism alike, but whose opinions are vastly absent outside those collected by organizations themselves. In doing so, it may inadvertently present aid insider concerns, considerations, and opinions as substitutes for those belonging to civilians.

Calculating Dissent: How Do Insiders Weigh the Decision to Speak Up?

Apart from those who had gone through official whistleblower channels, voluntarily or involuntarily, almost none of the practitioners interviewed for this research described themselves as dissenters or whistleblowers. Dissenter, they said, did not accurately describe their opinions and actions. Whistleblower meant something very specific in terms of reporting, and in terms of long-term career prospects. The introduction of both words also invited explanations from many interviewees to explain that they didn't think aid should be abolished and didn't want to be seen as dismissing the good parts to highlight the bad or dysfunctional ones. Other interviewees were very clear, naming aid as a purely political tool between and among governments or as an industry which depends on funds from external populations and donors and thus is designed to reinforce massive inequality as it claims to alleviate it.

Alongside institutional and organizational norms are the individual actors, decision-makers, and convergence of interests which frame decision-making within these institutional contexts.[15] Drawing on these two frames of analysis, the first part of this research asks how would-be dissenters weigh decisions to "speak up," and strategies they use for minimizing un/anticipated costs of doing so. Two guiding questions frame the analysis that follows:

1. What are the ethical, institutional, administrative, and personal calculations made by would-be dissenters in weighing the decision to "speak up" initially? How does that calculus change over time as institutional responses are sustained?
2. What strategies are used to minimize the cost of dissent in personal terms and to maximize the possibility of substantive change

Dissent and whistleblowing come in response to a wide range of perceived harm or wrongdoing. Among the most commonly recognized forms of wrongdoing, from an organizational perspective, are related to: (1) corruption, fraud, and waste, and increasingly; (2) sexual harassment or misconduct. The first of these narrowly construed areas of aid operation, architecture, and potential abuses of power relate to monetary expenditures as a gauge of aid integrity. The second relates to a globally recognized phenomena of sexualized power and abuse in the work place. It is difficult enough to report these forms of wrongdoing without the fear of retaliation or other consequences. However, a shared dilemma among aid insiders is represented by the lack of avenues for *even* naming most other forms of harm, let alone reporting them. These other categories, that remain nameless, are often structural, grounded in the violation of a principle and not the breach of a specific practice. They are often so widely practiced across organizations that they are legitimized by default.

As evidenced below, most internal reporting channels and protocols are construed around pre-defined types of wrongdoing and harm. Engaging these varied conceptions of harm, and what they entail substantively and procedurally, is the subject of another paper. Though to provide a brief sense of the ways in which different perceived forms of harm correspond to different reporting structures (as perceived by aid insiders), a matrix is presented lays below.[16] The x-axis lays out areas where dissent is perceived as an option by and among aid insiders.

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[15] In the article on the Political Economy of International Organizations, the main argument advanced is that the interests and preferences of states are not the only ones to consider as individual bureaucrats inside organizations, interest groups, and voters all shape decisions and actions taken inside international organizations. Perceptions of insiders whose interests may or may not align with states, are therefore, important to analyze more closely.

[16] The nature of what constitutes harm in the eyes of institutions, and in wider public perception, is the subject of a second part of this research, but is not able to be explored in detail here.

Reporting Structural Harm: Perceived Options and Limitations

	Options for Legitimate Dissent	Options for Protected Whistleblowing	Monitoring and Evaluation
Direct harm			
- Acts of violence (ex.)	Sometimes	Yes	Sometimes
- Report omissions (ex.)	No	No	Sometimes
- Trauma	Sometimes	No	Yes
Structural harm			
- Economic inequality (ex.	No	No	Yes
- Complicity with political repression (ex.)	Unclear	Unclear	
- Political or economic conditionalities that favor international communities over local communities	No	No	Sometimes
- Complicity with discriminatory clauses in bilateral or multilateral donor grants	Sometimes	No	No

Minimizing the harmful impacts of graft and corruption in aid delivery and expenditures is not the goal of this matrix. While there are plenty of risks and calculations undertaken to report direct harm or wrongdoing, there are virtually no options for even beginning the process as it relates to structural harm. This matrix opens up a series of questions related to how, where, and when these types of harm or inequality might be named and remedied.

Institutional, administrative and personal considerations

Calculations, consequences, costs, and a web of unknown possibilities are just a few of the ways aid insiders describe some of the deliberations on whether and when to take action related to perceived harm.

The three most common calculations are: (1) uncertainty about when, where, and how to act or report; (2) weighing tradeoffs, and; (3) gauging the integrity of individual decision-makers and institutional processes.

UNCERTAINTY ABOUT WHEN, WHERE, AND HOW TO ACT OR REPORT
- **If not related to fraud/corruption or sexual assault:** Regarding internal channels, most respondents expressed the procedural or administrative difficulty or ambiguity of reporting issues internally, including where to report them, for a number of situations they confronted outside those most standardly covered in international organizational ethics manuals: fraud, waste, corruption, and broad references to abuse, discrimination, and harassment. *Do Not Harm*, while an oft cited principle, appears no where as a prompt for triggering other formal procedures in the event of its violation. Even when concerns pertained to these areas, reporting chains and processes were sometimes unclear, including a combination of ethics offices, supervisors, and human resources employees in offices in different countries.
- **Where to go beyond supervisors?** A significant number of respondents explained that first mentions of concern often happened informally with supervisors. Some were reluctant to do this where supervisors may have also been implicated or whose jobs may be placed at risk based on substance of dissent (i.e. revealing harmful effects of quota-based fundraising in a particular program).
- **Media is a non-option at first:** Regarding external channels, no interviewees considered going to the external media as whistleblowers. A handful of interviewees published their grievances

anonymously through blogs or shared stories anonymously in social media groups designed for that purpose.

WEIGHING TRADEOFFS

- **Job in/security and future professional repercussions:** Fear of retaliation went beyond speculation and was cited as an expectation in situations of dissent or whistleblowing as the cost of taking such action. Every interviewee brought this up as a reality they had seen or experienced, and which must be realistically considered as part of this process. Beyond losing one's job, more subtle job considerations applied here too. For example, if future or additional funds for a project are tied to a particular kind of reporting, deviating from the norm may compromise organizational or programmatic funding. Alternatively, where host governments have placed tacit or overt boundaries for program operation, naming situations in which these boundaries are crossed may result in creating tension with host governments or influential actors.

- **Everything is a tradeoff, is it worse to act or not to act?** As an aid insider, many reported knowing something was wrong, but also expressed reluctance to move to judgement not knowing what else to consider. Would the cost of speaking up be borne by civilian populations? Who would a loss in funding harm the most? Sometimes considerations were less abstract and utilitarian, and had more to do with built in information barriers, "And the politics of donors also played out at the level of the war. Trying to speak out about, or talk about reform, during the war, were already dictated by higher politics. All the decisions were locked behind one person, and his disciples...and also you don't want to tear down all the good people who are working there...this is why most whistleblowers don't want to speak up (other than fear)."

- **Is it worth it if nothing is going to change?** Even those who distanced themselves from the terminology of *dissenter* and *whistleblower*, describing their actions as fairly mundane, explained deliberating on the question of whether anything would change. If not, some reasoned, what was the point of speaking up? Others had a different perspective. Six different profiles emerged with respect to how interviewees factored the likelihood of change into their decision to act raise concern.

  1. This aberration is such a clear violation of principle and practice that everyone will agree it needs to be named and addressed. *These respondents were often shocked when treated as whistleblowers*.
  2. As long as certain people are in charge, nothing will change, so why bother?
  3. Nothing will change through official channels, so I will try other ways.
  4. Remedying this one situation still leaves the culture, economic, and power dynamics intact. I'll lose my job and nothing of substance will change.
  5. The personal cost is too high, even if change is possible
  6. I don't care about the personal cost or possibility of change, I can't be complicit or sit quietly.

GAUGING INTEGRITY OF PROCESS AND KEY DECISION-MAKERS OR POLITICAL ACTORS

- **Deciphering informal discretion and formal protocols:** Interviewees reported knowledge of a wide variety of formal protocols for reporting wrongdoing, including but not limited to: human resources officers, confidential digital reporting channels to third party companies, internal ethics inspectors, spot checks or audits conducted by local government, and externally conducted monitoring and evaluation processes. Almost every interviewee also reported, whether perception or reality, that processes as written are often different than how they work in practice. According to the majority of interviewees, there is widely held discretion in how and when procedures and protocols are applied or upheld. This discretion sometimes relied on individual managers through

which information passed, other times it depended on higher level political or funding interests, and other times, it appeared to be a function of administrative decentralization within or across an organization. Uncertainty about the integrity of the reporting process, and weighing costs of potential retaliation against the possibility of information suppression (and thus, the invisibility of claims) factored significantly into individual decisions.

- **Informally mapping transnational gatekeepers in the organizational hierarchy:** The majority of interviewees explained that there are usually one or two country-level gatekeepers—whether organizational country directors or otherwise—who serve as the primary filter and decision-maker over information passing between field level operations, projects, or programs, and headquarters' or organizational secretariats. One interviewee stated, "I've been in a senior position for a long time. I have veto over any project in our region." Other ways of mapping gatekeepers and discretionary transnational bottlenecks include:
  - Whether there are any personal relationships among ethics and investigative bodies and people or teams named as complicit, contributing to, or driving harmful situations
  - Whether reporting and oversight bodies fall within the same reporting chain, or under, those that might be implicated by the substance of dissent
  - Using reputational cues shared about these gatekeepers. Do they "play by the rules"? Are they trustworthy? Are they vindictive?
  - For sub-contractors, navigating transnational gatekeepers is more complex as the number of intermediaries and decision-makers through which they must pass is significantly more than full-time employees, and often more distributed (as opposed to linear) across offices and countries. Sub-contractors similarly have fewer contractual rights and their jobs are more precarious at the outset.

- **Likelihood of omissions in reporting:** Several interviewees reported that it was far more common to leave out important information than to manipulate or insert false information. A common dilemma among aid insiders is how and where to name significant omissions from first drafts all the way through to final reports. There is editorial discretion at several points between the first draft of a program report and its final version. One interviewee delivered an even more casual explanation, "The basic Swiss army knife aid worker…this person is aware of some mismanagement that's happening at some camp. She includes it, she did the wise thing. The head of department then makes a decision – he might want to suppress it, nuance it, leave it as is, he might come to me and ask what I think. Maybe the program officer is aware of the abuse and doesn't want to put it in the report. It's so highly variable according to my observation relies on everyone doing the right thing."

Strategies for minimizing the costs and maximizing the possibility of change

As insiders navigate the intersection of transnational bureaucracy, institutional, national, and transnational politics, and entrenched norms, many describe active or passive strategies for engaging in acts or processes of dissent. These strategies most commonly aimed to minimize the personal and professional costs of dissenting or whistleblowing and/or to maximize the possibility that speaking up would lead to some sort of sustained change or remedy. Weighing personal costs factored into most interviewees' stated considerations, either at the outset or as protracted scenarios of retaliation or more subtle intimidation ensued. Apart from a few interviewees, strategies were more often described in passive terms, as the entire process often came as a series of surprises navigated through trial-and-error. For some, these processes became more familiar and navigable over time, much less so for others. They often described approaches that evolved through, and were shaped by, back-and-forth with a range of institutional actors over long periods of time.

Strategies can be described under four headings: (1) legal and procedural approaches; (2) raising advocacy and awareness; (3) collective action or alliance building, and/or; (4) flipping or subverting institutional paradigms. These four categories are not mutually exclusive, and quite the opposite, often overlapped or were pursued sequentially.

		Legal/ Procedural	Advocacy	Alliances or Collective Action	Subversion
Reliance on veterans and mentors	Whistleblowers become informal experts in organizational protocols through self-protection efforts exercised during and through whistleblower proceedings or multiple scenarios of dissent and response. They later become experts of a system few others understand in its complexity that others go to for advice and support.			X	
	Alternatively, there are long-term aid workers who learn through observation and remain precisely because they have developed skills to evade or avoid retaliatory processes, often through subversion or circumvention of unfair or unjust processes (rather than direct approaches). More junior colleagues frequently seek their advice as well.			X	X
Sequencing	**Speak up only after there is a visible, critical mass on the same topic, or in fora where stories can be shared anonymously and collectively:** Availability and visibility of digital social media groups that allow for collective, and often anonymous posting, has triggered documented storytelling on similar and new topics on an unprecedented scale. The #aidtoo phenomena represents this. One anonymous curator of these stories explained, "I was getting a steady stream of messages, Skypes, from colleagues inside the organization forwarding my own writing back to me saying things like, "dude, you have to check out…"		X	X	
	Media engagement tends to be a last resort: Whistleblowers engage in serious risks when they engage with the media. They have to establish relationships of trust. Journalists also have audience, editor, all issues to consider. There is a widespread reluctance to go to the media first, or even during processes. It is often described as a last resort or a non-option.		X		
	Leave first, report after: All former or current whistleblowers interviewed for this research said that they would advise current staff to find other jobs before blowing the whistle. There is a strong sentiment that the cards are overwhelmingly stacked against you due to a lack of independent or external oversight. However, when asked if the media should be an option early on, respondents were reluctant.	X			
Indirect or subversive approaches	**Redirecting accusations of harm or risk:** Converting external harm considerations into organizational risk considerations by citing an organization's bottom line or media reputation				X
	Redistributing power or resources within institutional boundaries: Redistribute funds captured by top ten contractors toward capacity and resources for orgs that will stay. Particular dilemmas that arise here in terms of bi-directional accusations of corruption.		X		X
	Circumventing conflicts of interest: More experienced dissenters had strategies for circumventing conflicts of interest or individuals they felt had too much discretion.				X
Flipping the focus of	**Create independent, grassroots, complaint and aid monitoring systems:** Revising metrics and standards from focusing on successes and failures in technical terms to focusing on presence and role of organization in economic, social and political terms. "The objective of that was to move the				

metrics onto institutions	community to a place where they had more effective rights claiming. They used to say things like my neighbor got a house and I didn't and that's not fair. It's an individual complaint, calling for fairness which is not a concept in aid. If they had said our community had been discriminated against in this aid distribution, that's a collective claim and can be held against IHL. Often recipients don't even know who they got something from.	X	X	X	X
Documentation and evidence-gathering	Those who are involved in protracted processes of formal proceedings or informal retaliation begin documenting exchanges far before overtly dissenting or raising questions. This includes recording conversations, taking prolific notes during and following meetings, and creating dual email inboxes to record email exchanges and other correspondence or documents.	X			
Finding state-level legal precedents, or international law, to apply	As a strategy, this was one of the few cited by practitioners, legal counsel, investigators, and social movement organizers as something they had considered or tried at some point. Several interviewees cited international humanitarian law to oppose accepting grant agreements that included anti-terrorism conditionalities. One interview cited a legal precedent held in several states in the United States which gave them legal protection for recording conversations without the other party's consent. A third interviewee saw this strategy used in their office to pass sweeping sexual harassment protections that were not mandated by the institution or national laws where operating.	X	X		
Soliciting international state and non-state actors directly	Soliciting support or protection from countries whose interests align with the substance of dissent. This sometimes entails citing national laws, and other times entails directly appealing to specific foreign policy interests, economic alliances, and national values, regardless of support for them in the host country.	X	X		
	Mobilizing support and alliances of INGOs in close physical proximity to international secretariats or headquarters		X	X	
	Going to interested [and often partisan] media in countries with strong political influence.		X		X
	Attending conferences and roundtables in international cities where high-level decision-makers are present, in order to bypass transnational reporting chains and overcome physical distance.		X		X

Organizational Responses to Principled Dissent

How do organizations and institutions respond administratively, narratively, and procedurally, to principled dissent among aid insiders?

There is wide variation in how, and on what terms, international organizations respond to perceived dissent, active challenges to operational or political norms, and/or to whistleblowing. It is far beyond the scope of this paper to make causal claims between certain types of harm, modes of dissent, organizations or contexts and the specific responses undertaken. Thus, the analysis below, akin to the previous section, is an overview of organizational responses across context. It aims to identify patterns of organizational response that appear more common across organizations, contexts, and modes of dissent. The different responses below were cited across bilateral, multilateral, and non-governmental organizations.

The responses below, narrated as processes and experiences of retaliation or suppression, are sometimes similar if not exactly the same as processes undertaken during legitimate investigations. Sharing the same features often renders it difficult to use these organizational responses as signals of retaliation without much further research.

Findings are organized into three thematic areas:
1. Organizational actions taken toward the individual;
2. Internal administrative complexity that obscures or dilutes strength of dissent, and;
3. Externally-facing organizational responses and explanations.

Organizational responses to individual employees or staff within organizations

Among the most common narrative that emerged was one of damage control or risk management. Nearly all interviewees described organizational responses as aimed at 'damage control, risk or liability management, "The way they responded to me was about minimizing damage, not about remedying what happened." If situations rose to the level of scandal, then it is dealt with as an exceptional case, while the culture that enabled it remains untouched, "The Pope comes and goes but the Cardinals stay," offered one interviewee. While some interviewees described incentives as part of organizational efforts to manage principled dissent, deterrents and punitive action appeared far more common. The most common incentive, or carrot, included promotion offers which interviewees felt would be in exchange for their silence. Deterrents and punitive measures are listed below.

IN/DIRECT REPRISAL OR PUNITIVE MEASURES
- **Non-renewal of contracts**: International organizations rely heavily on consultants or contractors, rather than full-time employees. Some of these contractors are otherwise employed on a full-time basis, though whose contracts require regular renewal. Others are hired for short-term positions or functions. Many interviewees described non-renewal of contracts, whether long-term or short-term, as a response to dissent. However, because these types of contracts are so common, the ability separate retaliatory non-renewals from legitimate non-renewals becomes difficult.
- **Place employee on probation or under investigation:** Conducting retaliatory investigations, often focused on procedural infractions or violations, came up frequently. Practitioners, legal counsel, and ethics officers all named this common, albeit often discretionary, response. Several respondents also explained that being under investigation also provided leverage for organizations to manage or suppress ongoing or past dissent, alternating between "carrots and sticks" based on compliance, or lack thereof.
- **Place employee on administrative leave:** Some interviewees described being placed on administrative leave, separated entirely from their teams and workloads within hours, once organizational managers suspected whistleblowing.

- Described as either **red-listing or black-listing,** this appears to be among the unwritten rules one can expect for speaking out of line or challenging institutional norms on ethical or principled grounds, even if and when citing direct contradictions or violations of an organization's stated values or mission. It was nearly always described as an informal consideration between and among colleagues in an industry where "everyone knows each other." Several respondents explained that they had been red-listed or blacklisted, or knew of others who had been, in response to questioning business-as-usual or reporting a particular kind of harm taking place. According to one interviewee, "Then what are the consequences for me? I am a troublemaker. I'm red-listed by several organizations. In South Sudan, I warned the donor that the Chief of Party who came after me was not going to be good. The contractor now won't hire me even 10 years later. The guy that I warned the donor about was bringing prostitutes to hotels for community consultations and was fired three months later. The penalty for me was that the company will no longer hire me."
- **Transfer to posts** that are isolate from organizational headquarters, high-level decision-makers, or distance dissenters from their everyday lives. Sometimes assigned posts even pose specific dangers. One interviewee was transferred to a post in a country which they previously criticized publicly and regularly for its poor human rights record during and following a military takeover, which was still in place at the time. The interviewee was told there would be a contract for them to sign upon arrival, with no guarantees of protection or clarity on what the contract entailed.

IN/FORMAL ISOLATION, PSYCHOLOGICAL MANIPULATION, AND INTIMIDATION
- **Subtle or rapid allegations of poor performance:** People who dissent or raise ethical questions related to harm, misrepresentation, are slowly or suddenly confronted with reports of poor performance.
- **Place employee on administrative leave:** Some interviewees described being placed on administrative leave, separated entirely from their teams and workloads within hours, once organizational managers suspected whistleblowing.
- **Last minute closed door meetings with no information or representation.** Perceived dissenters or whistleblowers are often invited, with little advance notice or information, to closed door meetings where they first sense they are 'in trouble': In these meetings, employees:
  - Were told they were under investigation for breaches of protocol
  - Entered a room with multiple senior officials and decision-makers and underwent what felt like an interrogation. It varied whether or not they knew what prompted the meeting.
  - Were told to sign additional confidentiality and non-disclosure agreements, beyond those signed as part of employment, with varying amounts of information. These agreements often prohibited them from discussing anything that followed with their colleagues, and sometimes even external counsel.
- **Seize or surveil employee communications:** Install email auditing to monitor all current and past work communications, including email and phone. Seize computer and work-related devices, including mobile phones, hard copies on desks, and anything that is considered property of the organization, "HR seized my computer and conducted a forensics scan. They thought they would find gambling or porn, which you could get fired for."
- **Stir personal and/or professional doubt among colleagues:** Creating conditions on teams where doubts about the problematic employee's capacity or judgement are questioned, often during mundane activities like staff meetings.
- **Promotion or reprimand of colleagues:** Colleagues of dissenter are either promoted to encourage distance or reprimanded to deter interaction. By promoting or investigating their close colleagues or people who may be sympathetic or share their views.
- **Avoidance by colleagues:** Several interviewees stated that other team members avoided them either because: (1) they were nervous about being implicated by association, or because; (2) they

felt morally judged [for their perceived silence or complicity] by their dissenting colleague.
- **If it is not documented, it doesn't exist:** People are sometimes told by supervisors or human resources representatives that they imagined entire conversations or misunderstood statements made (even when statements referenced decisions or actions discussed or repeated multiple times), "There are policies in place, but a lot of this is happening between people. The only way you last this long is by never doing anything wrong--having a lot of integrity, or nothing anyone else can 'use' on you--or by having information about other people." This response came frequently when employees challenged actions they were previously instructed to take.
- **Normalize actions to create employee self-doubt:** Individuals being told that actions or processes they describe as harmful or problematic as normal. Most interviewees responded that if this response was given, at first, it was ignored but over time self-doubt began to rise.
- **Lesser of two evils:** "Some people would say, 'would you rather we leave'? I would say, if you're offering bad aid or no aid, you should find a third option. We're not saying you should leave, but that you should be here in solidarity, not as colonizer. Int. aid system owes to people in South."
- **Use of paid medical leave to cope with stress:** Several interviewees needed to go on medical leave due to the stress of intimidation and retaliation.

DISTRACT AND REDIRECT
- **Shift emphasis of organization-employee interaction from substance of organizational harm raised by employee, and toward individual employee breach of administrative protocol:** Converting discussion about politics and principle into an administrative back-and-forth squarely puts the employee on the defensive and redirects attention away from a political or moral focus onto a procedural one. This pattern was named across all bilateral, multilateral, and non-governmental organizations. Common institutional responses were to accuse dissenter of violating confidentiality agreements or of poor performance, "The accusation that stuck was that I used harsh, vulgar, and offensive language online, and by so doing had misrepresented the agency. They said that if the donors saw it, what would they think? It would cost them money." In response to several anonymous blog posts written about widespread pandering to donors and the lack of ability to use resources for local populations needs as a result, one employee earned this response.
- **Create moral equivalency between administrative procedures and in/direct harm** that is raised. Building on the previous bullet, this is a narrative contortion which levels accusations of failure to comply with protocol with accusations of structural harm or violence.
- **Bury them in paper work:** By redirecting interactions toward administrative and procedural questions, organizations are able to then create thick administrative burdens with which employees must contend in order to merely maintain their job, or recover their job. It can create an unrealistic workload, once added onto the tasks required to fulfill duties outlined in a job description.

Internal/Administrative
While the previous list of organizational responses to a range of organizational responses taken toward individual dissenters or whistleblowers, the following section describes organizational explanations or administrative architecture which are cited in obscuring, overlooking, or suppressing avenues for dissent to arise in the first place. The previous section similarly outlines active actions taken, while this section combines both active strategies and structural realities that enable minimizing or obscuring the naming of harm.

- **Rationalize harm as inevitable tradeoff of both complexity and context:** "Indicators are usually very vague. It's almost impossible to find a causal relationship in any one organization's decision to the chaotic and/or harmful outcomes that ensue. Some examples are a culture of sub-contractors doing the most dangerous work, or everything being framed as counter-terrorism, or the year that all the project money dries up and there's an economic vacuum. Each project is one piece of a confluence of actors doing things. It makes it easy for individual organizations to explain their way out of a particular act, action, or role." As listed off by this interviewee, there is often an easy explanation about complexity and circumstance that explains actions.

- **"It's normal, this is how things work":** Cite norms of collective organizational culture to normalize questionable behavior. This response is given to explain that a single organization cannot be held accountable for dominant norms exercised by most/all organizations around them, or to draw equivalence between what is widely practiced and what is acceptable. As interviewees pointed to contradictions between principle and practice, they learned to anticipate this response.

- **Violation of a principle is not violation of a rule:** An early and ongoing organizational method of side-stepping the need to open an inquiry, or engaging a dissenter, involved stating that 'violation of a principle is not violation of a rule.' When principled dissent sought to name principles such as *Do No Harm*, or human rights in framing violations of organizational responsibility or mission, responses sometimes granted declared that since no specific rule had been broken, no accountability mechanisms could be triggered, "When I first went to HR and was told that just because someone might get killed, it didn't necessarily break the rules, they told me I had to cite a specific rule. That's the function of the Ethics Office, to make sure rules aren't being broken. When I tried to tie the action to the principles represented in the rules, it wasn't enough."

- **Organizational complexity obscures overlapping areas of dissent or complaint:** International organizations sometimes have dozens of offices, and two or three times as many projects in just as many countries. Departments or agencies under a single IO umbrella may invoke or adhere to different mandates, investigative, or ethics units, varied or even competing staff manuals and policies, and procurement processes. The states and general publics within those states to which they are supposed to be accountable are a patchwork on top of that. Among the most complex, "Several different parts of the UN each have their own investigations offices and departments/teams (totally separate bodies and entities from the others). The Secretary General, UNFPA, UNHCR, UNICEF, and UNDP all have separate bodies that investigate wrongdoing/misconduct," stated one interviewee, who then went on to explain that none is independent from the institutional interests they represent.

- **Mute or minimize questions as information moves up through org hierarchy:** There are two ways in which internal reporting allows for passive muting of principled dissent as [reports] are shared up through reporting chains. The first is more passive and appears highly institutionalized. The sheer number of people who see and have discretion over the way that reports are framed, what gets included or excluded, involves a matrix of points where minor individual editorializing translates into a widely muted message. The second is more active and appears more *ad hoc* than the former: actively blocking information, questions, concerns, reports or messages from moving forward. There are many points at which a single gatekeeper has this discretion. In both scenarios, the chain of command in reporting is long, and exacerbates individual tendencies to minimize or reduce, "The reporting process is another issue is that you have to report it to your supervisor, then someone more senior, then within the recruiting agency or organization. Once you have

exhausted all of these options, then you can go outside." Adding the widely perceived conflicts of interest that appear in reporting chains into the mix adds an additional set of barriers and risks.

- **Constant rotation, turnover, and lack of public information can often render continuity of dissent bureaucratically impossible:** The annual or semi-annual rotation of staff between and across countries and projects creates enormous decentralization in process, practice, and politics of country-level agendas or project-level activities. In some contexts, because the site or location is considered too dangerous, expatriate managerial staff are based in an entirely separate country. In Kenya for Somalia, in Tunisia for Libya, in Jordan for Syria. Apart from the openly neo-colonial characterization of these relationships, the rotation of staff in and out of the country renders continuous dissent almost impossible on a sustained basis, especially if and when it applies to the collective presence, impact, or dynamics of dozens or hundreds of organizations. One interviewee explained, "All of the aid that came (not enough) went to people that lost houses in 2014. If you had lost your house in 2012 or 2008, [you were]not eligible. Or if you lived in a tin shack or wooden shack, [you were] also not eligible. Really poor people [were not] not eligible to get houses while rich people who lost houses were getting houses. This kind of complaint has nowhere to go."

- **Citation of competing internal policies, protocols, or requirements:** When there are protocols and policies that can be cited by dissenters, there are often competing alternatives located in another office or part of the organization's internal protocols that can be cited by organizational administration or human resources. One interviewee was told that citation of job responsibilities outlined in their contract could not be cited as a justification for undertaking those very actions. In these situations, the burden of figuring out how to navigate administrative protocols becomes a circular exercise for the employee who has a choice between: (1) fulfilling duties as outlined in the contract, and which are at odds the professional obligation to follow the discretion of a supervisor; and even more so, which; (3) directly contradicting broader principles that claim to be the basis of the work being undertaken.

- **Denial of accusations based on lack of documented complaints:** Several interviewees described situations where supervising authorities, ethics officers, or investigators dismissed follow-up claims of wrongdoing or harm since no (or very few) documented complaints or citations had been registered. Documentation can be a deterrent from reporting unless guarantees of anonymity and protection accompany it, which sometimes appear to be impossible in practice. In the experience of several interviewees, prior to the #metoo scandals, this was a common response given regarding accusations of sexual assault and violence.

Organizational responses that signal reform

Whatever the trigger, the following is a list of ways in which signals toward organizational reform are made. These practices may lead to, or trigger, internal reform, though short of external oversight and practical analysis, it remains unclear. Interviewees described layered responses based on external pressure and audience. The following breaks down some of those different pressures and audiences, and corresponding observations from staff on how organizations responded differently to each.

- **Institutional reform triggered gradually by public scandals, not by internal reporting:** A common theme across interviews was the increased proclivity for organizations to take claims seriously and act to remedy them if media coverage was a possibility or had occurred. The more consistent the coverage, the more seriously claims were taken. This was true across non-governmental international orgs, multilateral, whether focused on human rights or economic development. One interviewee remarked, in the wake of #metoo, that managers were more eager

to hear a wide range of dissenter grievances, "There's an increased openness, not everyone is saying it in these words, but saying we need internal whistleblowers, so we can address it before it goes out. #Metoo caught a big response in terms of Oxfam because it caused donors embarrassment." Others commented that the media moment certainly transformed internal approaches to sexual harassment claims, or even insinuations, but left most other ethical grievances untouched.

- **Implement superficial accountability measures:** This might include increasing the volume of investigations, at lower levels of responsibility, "Since then, high level people are not the subject of investigations. It's pivoted to lower level things, 'the guy watching porn in the basement'. It's not taken seriously for tackling these things at the top anymore," or making public commitments to reform in international conferences, or creating new feedback or civilian consultation practices, "Looking at beneficiaries as clients, now. It's so much easier now to consult people and get their feedback. Beneficiary accountability norms have changed a lot of this."

- **Commit to reforms at/through conferences, roundtables, and working groups:** A simultaneous premise and outcome of the new conference economy is making commitments to change or actively engaging self- or sector-critique, reform, and improvement, "There are millions of dollars invested now in the superstructure of the industry…in conferences, agendas, planning, and learning. It ripples out and repeats." Conference attendance requires time, resources, and mobility—including visas, days of childcare or the ability to take off work—and language skills for interacting and participating. A high volume of conferences are concentrated in headquarter countries in the global North, far removed from day-to-day life or reach from not only civilians, but national staff. In these for a, raising and responding to critical conversations about aid architecture and practice does two things: (1) buffers organizations from the majority of civilians that interact with day-to-day projects and politics; and (2) reinforces the notion that accountability for things taking place in Nairobi can effectively be raised and addressed in Geneva, New York (or Johannesburg).

- **Convert systemic flaws into individualized project successes or failures:** Systemic problems are converted into project level failures or areas for learning. The rise of mandatory monitoring and evaluation at all levels of program and project activity has enabled a narrative of the project-level which stands apart from policies, decisions, resources, and politics at the top. The scientific nature of monitoring and evaluation initiatives promotes narratives that reform will follow detection of areas that need to change, "Monitoring and evaluation tools are set up are around good/bad practice, resilience, [and other] new buzz words. It takes concepts and quantifies them. Those at the forefront of the most updated terminology and rhetoric incorporate into proposals and reflect trends in donor preferences and framing of 'best practices.'"

- **Normative standards for external programming do not apply to internal operations:** The following grievance institutional response are quite common: "I was hired to evaluate a major international humanitarian organization's application of *Do No Harm* in one country. Through case studies, they were evaluating how they were doing. Does the driver follow the rules? Does the staff act privileged to local organizations? I was interviewing their staff, and the staff was actually applying *Do No Harm* within the organization. For example, why was there hundreds of dollars of salary for someone with a PhD versus $10K a month for someone who is 24? When the London representative came, I explained how they had applied it to the organization. The head cut me off and said, 'how is this relevant?' She said, 'we're looking at how it's applied in terms of impact, not whether it's practiced internally.' I was never hired again by them."

Beyond Self-Regulation and Structural Barriers to Change

In summary, several trends emerge on the calculations and strategies of both dissenters and international organizations in both naming and dealing with real or perceived structural harm or wrongdoing. Several factors and arrangements enable these dynamics, while others serve as structural barriers to accountability beyond institutional self-regulation. This report concludes by discussing core trends and calculations that characterize the back-and-forth between staff and organizational leadership, the dilemmas and tradeoffs in which individual and organizational decisions take place, and a list of structural barriers and enablers which perpetuate these norms even while individual cases may gain significant attention.

1) **Individualization of systemic issues: Emphasis on technical solutions to political problems**
   - Converting political problems into technical questions
   - Individualization of systemic problems
2) **Uneven/Inconsistent power dynamics in system design and rule arrangements**
   - Conflict of interest in/through investigative and decision-making roles
   - Vertical accountability, few horizontal processes
3) **Normalized self-regulation and lack of independent or grassroots oversight**
   - Sparse in-depth external media coverage apart from scandals
   - Decentralized or competing systems of protocols, and jurisdictions

INDIVIDUALIZATION OF SYSTEMIC ISSUES | EMPHASIS ON TECHNICAL SOLUTIONS TO POLITICAL PROBLEMS

The individualization of harm or wrongdoing has the effect of overlooking broader structural power dynamics, practices, and decision-making processes which both enable them, or alternatively, may be at odds with local interests or preferences even when not violating any particular rule. One interviewee had a straightforward response, "*Do No Harm* says you need to get the context right otherwise you may cause harm. In Palestine, we subsidize the Occupation, full stop." Another explained that NGOs in South Sudan informally had to pay a tax of several thousand dollars to operate there after independence. Was this the cost of doing humanitarian work? Was it exacerbating the conflict? Who gets to make those decisions? Dissent in these two scenarios is not only a matter of political risk, but even more, of administrative impossibility. Where do you go?

Individual dissenters are routinely isolated in their attempts to in/directly raise issues or questions about operational norms, resource politics, or aid cultures more broadly. Across borders and offices, isolation is practiced through discrediting their work or reputation, burdening them with paperwork, or even direct retaliation. It is common for cases of dissent and whistleblowing to become cases of harassment. Both these dynamics render aggregate examination of trends or collective action difficult and/or largely out of reach.

Alternatively, someone dissenting in relation to one project in one region of one country inside an organization that has a presence in dozens of countries with hundreds of projects, takes a somewhat blind leap in speaking out with little information on if and how common those practices are across borders, managers, and funding cycles. This pattern identification is further inhibited by internal organizational discretion for conducting such analysis or releasing data for others to conduct. Would-be dissenters have little information about what to expect if and when retaliation is experienced principled debates quickly become administrative competitions.

Across organizations, emphasis on individual organizational scandals often leaves broader aid cultures operating seamlessly for the most part. The individualization of wrongdoing and legalistic remedies of it leads to intense focus on single individuals or organizations as exceptions or deviants, while keeping

institutional norms and behaviors intact. Responses to the Oxfam Haiti scandal exemplified this tendency and conundrum.

"Where do we go," implored one aid worker turned researcher, to find out, "…how the political economy of aid interacts with the political economy of a country—in Niger or Mali." She went on to explain that international organizations and donor states don't have the will to do this kind of analysis: "It doesn't matter to them. You can see this in the history of 'change' in the industry. The rhetoric is different, but the processes continue to be the same. We repackage, repeat, and roll the dice." Monitoring and evaluation initiatives, designed to increase accountability and efficacy, often result in the creation of new terminology and rhetorical changes which help to address criticism, though which fail to name, let alone address how aid interventions interact with, change the dynamics of, and contribute to political and economic realities. Several interviewees named entirely grassroots processes of generating metrics to transfer the focus of assessments from top-down project-centered goals and outcomes to bottom-up perceptions of specific aid organizations, issues, or donors. Each of them followed by explaining that neither donors nor implementing organizations received these proposals enthusiastically. Another interviewee explained that the volume of organizations providing services buffered any of them individually from receiving general complaints or pushback, "Because we had so much experience with complaints, we anticipated that people's complaints were often not able to be directed at one organization, so there was nowhere to put them, and that most of responses to complaints would be unsatisfactory." In other words, what would potentially be pressure on public officials about general conditions, or dissatisfaction with a combination of services, literally has no equivalent in aid saturated areas due to the level of decentralization.

Uneven/Inconsistent power dynamics and Entrenched Self-Regulation

The limitations of whistleblower terminology and associated processes for naming and addressing systemic or structural forms of wrongdoing or harm have been investigated as a central question throughout this report. From issues related to sovereignty and self-determination to fairness in pay scales, a lack of terminology inhibits greater understanding of the full range of dissenting opinions and actions taken, on what issues, and their frequency.

Self-regulation is largely the norm, although scandals tend to trigger public-facing reform. Which public? Scandals that appeal to media consumers or tax-payers in donor countries, along with scandals that upset host governments, appear to be the two most common external pressures [and publics] that ignite top-down reform processes. Internal organizational checks and balances protocols or offices are often independent in theory, but not in practice. This includes investigations and ethics offices, along with monitoring and evaluation teams which are hired externally, but whose long-term interest remains with the hiring organization and not the community or project being evaluated.

At nearly every level of organizational decision-making, there are built in discretionary points. Individual gatekeepers may informally have authority over most documented information going in and out of a single country. There are official and unofficial rule arrangements, those written in organizational protocols and those which demarcate lines that should not be crossed with critical questions or challenging of norms or narratives. Official rule arrangements focus on quantifiable rule violations, for example, counting missing funds or naming exaggerated aid delivery figures (fraud). These are still difficult to report if the source of wrongdoing comes from within an organization, as opposed to an aid partner or recipient. There is almost no focus given to problems or grievances associated with [non-quantifiable] power relations in aid decision-making, resource distribution, and social or economic life. When dissenters present issue, the largely self-regulating machinery of different organizations sets in motion unless dissenters seek external support or find an executive ally.

Media may naturally fill a gap here, providing external coverage absent some of the challenges that accompany internal self-regulation. However, Journalists inside media organizations also face hurdles internally on three levels: (1) collecting sufficient documentation, sources, and evidence across extremely complex institutional arrangements in several countries, and; (2) convincing editors that stories are worthwhile, and; (3) how to make those stories relevant to the reading public. On that last point, a common theme among UK international aid reporting focuses on how responsibly tax-payer aid funds have been spent. While responsibility here has been interpreted in moral as well as fiscal terms, it remains that stories about humanitarian-military cooperation in Somalia may be less interesting unless there is a UK specific scandal or angle. Some reporters explained, "Part of the reason that more media doesn't shine critical light or cover UN critically is because the UN cuts of access when they do. The difference at the UN is that there are no voters to the UN. The institutions are at arm's length from constituents. Going back to the tax-payer issue, there are no voters to un-elect UN leadership, or vote them out of decisions, policies, actions, are not supported (or are in violation of values/norms held by those publics)." One whistleblower explained that sometimes there is a cost to reaching out to international media, *because* stories often appeal to some aspect of national partisan politics where media outlets are headquartered. When it comes to critical media coverage more generally, regarding the UN, they explained: "Media in the US is very partisan, reflects the divide in Congress and some. The Democrats want to preserve UN funding at all costs. The Republicans want to cut it. Whistleblowers are caught in the middle For this reason, the Democrats overlook corruption to protect support for UN budgets. The Republicans make mountains out of mole hills to lambast the UN."

Alternatively, authoritarian crackdowns often involve sweeping accusations of entire NGO and civil society sector as being foreign agents, and justify widespread closures, censorship, or even imprisonment, with this logic. Media and international civil society have expressed reluctance to raise a critical eye on international organizations in environments of severe political repression. Several journalists also stated quite directly that when you could be covering militias, counterinsurgencies, and impending humanitarian disaster, conducting critical investigations inside international organizations is just not a priority.

Would-be dissenters, then, often feel there is little recourse if internal processes appear to be sidelining or silencing them. Absent clear and consistent external pressures, or checks and balances, even when analysis is conducted on structural trends that may be harmful or damaging, it remains an open question what prompts change across organizations other than the threat of future funding. There are few mechanisms in international organizations, like nationally-bound Freedom of Information Acts, to request backlogs of internal documentation regarding specific cases or decisions.

As aid insiders get caught in or succumb to navigating the informal rules which dictate which norms can be questioned or which harm can be named, they remain in positions of power relative to civilians whose opinions and preferences often may not extend past the project-level, let alone make it to Geneva. As an industry which has grown exponentially by advancing technical proposals to solve poverty, war, economic collapse, and humanitarian crisis among many other areas; the day-to-day politics from top-to-bottom are still quite a mystery.

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