Do No *Structural* Harm?

Dissent in International & Non-Governmental Organizations (IOS and NGOs)

**SEPT 2018**

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This research was undertaken over a four-month period in 2018 and finalized in September of that year. In the three years between completion and publicly sharing these findings in September 2021, there have been enormous shifts and gains in the field of dissent and whistleblowing in international organizations and NGOs, including #aidtoo, the Somali Congress of Trade Unions documentation of structural racism among national staff at many United Nations agencies in the country, #DecolonizeMSF, the Facebook Papers leak, and the tidal wave of open, public reckonings with institutional racism and structural colonialism that pervade humanitarian and development institutions triggered by the Summer 2020 racial justice protests following the murders of George Floyd and Breonna Taylor by U.S. police. Additionally, since all research and final writing of this report took place more than a year before the first case of COVID-19 was documented anywhere in the world, hundreds of conversations about equity and public health, the ethics of private markets, and the politicization of science, among many other threads are similarly absent.

These events, conversations, collective actions, and unmediated public disclosures — among many others — took place following research completion in 2018, and while they remain unnamed below, their relevance could not be more central to the questions and findings posed here. Most importantly, they help contextualize and guide what transformation might look like in asking where to go from here. My hope is that the findings shared here might still offer some modest insight and contribution to the folks taking on the enormously challenging task of exposing internal dynamics that cause public harm in international organizations and/or NGOs, and who, both individually and collectively, move to change them.

- Anna Levy, report author and researcher

Acknowledgements
It is with great thanks to the Government Accountability Project for awarding me the Getulio P. Carvalho Fellowship grant, enabling this research to take place. Specific thanks is extended to Beatrice Edwards, for her commitment and encouragement.
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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 to 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 has many definitions and interpretations. 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, structural violence, or algorithmic manipulation. What constitutes harm, and what principled dissent accompanies it, is highly contested. Ambiguity, abstraction, imperial and colonial histories, and differing world views render specific technical or administrative channels for naming and addressing structural harm difficult at best and often administratively impossible beyond that.

The 2018 revelations of widespread solicitation and exploitation of sex workers among Oxfam staff in Haiti amidst 2010 earthquake relief operations gained rapid and widespread global attention. 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. 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 first decade of the 21st century. Yet to many Haitian civilians, and aid workers of all nationalities globally, 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,” further pointing out that most reporting and reforming in aid contexts must be tied to existing guidelines and policies. As a principle then, if every possible scenario which may result in harm isn’t already catalogued as such, “there’s no way to define good or bad practice in terms of Do No Harm.” Global attention on Oxfam alone obscured questions about broader cultural, normative, and operational conditions in humanitarian [and often development] aid contexts which may enable or even perpetuate these behaviors, rather focusing on the scandal of a single organization and country, and the shock of a few ‘bad apples’ that managed to evade accountability for so many years.

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, who they are accessible for, with what regulatory controls providing oversight, and in whose interest. Short of a #metoo moment, where do stories similar to those expressed by Oxfam Haiti staff [seven years prior to the moment of redress] get told? How common are they? Can they be explained by ‘bad apples’ or built-in features of current transnational organizational and aid architecture?

According to Eyal Weizman, conflict zones have seen an especially rapid increase in the presence of international organizations, “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.” 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

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3 Anonymous Interviewee, July 2018.
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.
and concerns. The increase since 2003 is undoubtedly significant, if not exponential. 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, 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 international non-governmental, multilateral, and local organizations have in emergency, conflict, and transitional settings—this research examines a narrow subset of internal accountability dynamics, processes, and cultures shared across transnational organizations. It focuses specifically on the role of would-be (or actual) internal dissenters and whistleblowers, and international organizations’ responses to them.

This paper forms the first part of a longer-term research project focused on:

1. Understanding the role of development and humanitarian actors as political actors in complex emergencies, political, or economic contexts;
2. Clarifying the tradeoffs made in and by aid actors through the full cycle of humanitarian and development operations and decision-making with respect to different conceptions of harm;
3. Broadening the scope of what constitutes harm to include sector wide norms or practices that enable and reproduce conditions of inequality or injustice—whether historic or at present, and to;
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.

It focuses specifically on three core questions:

1. How do internal dissenters and whistleblowers—organizational insiders—name and seek to mitigate organizational dynamics of harm, violence, or inequality that lead to or perpetuate structural or individual harm?
2. How do organizations respond to internal dissent and whistleblowing along these lines?
3. Are there common patterns and strategies taken by dissenters and by institutions responding to them, 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.

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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.jsp?ProductID=89. She does not specify which countries are/n’t included in the label 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.
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 to them, 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 within and across these organizations. In sharpening insight on these topics, the hope is that researchers, practitioners, and policy-makers can better analyze the politics and power dynamics within and across the aid industry specifically, but dissent and whistleblowing more generally within organizations operating in dozens or hundreds of different jurisdictions.

Rationale for focusing on Insider-Dissenters rather than civilians

1. Why go beyond whistleblowing to include dissent?

In its 2018 *Best Practice Guide for Whistleblowing Legislation*, 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 challenge relates to the question of the ‘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, often rely on their own internal policies, protocols, and jurisdiction in these situations. This dilemma is well-documented in other research, which posits that while accountability statements are oriented toward host populations, actual 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 merely 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, designing algorithms for monitoring disinformation, and/or 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, emblematic, and egregious examples of wrongdoing.

The entire process flows from what is already thought to count, and alternatively, 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.8

At times, it is precisely the norms and rules which sometimes earn significant criticism for their facilitation of unequal power dynamics or inequality. As such, whistleblowing cannot adequately address these grievances through channels designated for, and designed according to, largely pre-defined categories of wrongdoing. The result is a system where none of these previously named examples rise to constitute a harm official enough to warrant 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.9”

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 injustice or harm and attempt to ask about it (let alone remedy it).10

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 insiders raise issue with, some of which are easily namable as wrongdoing, and many of which are not. The form this dissent takes may include a range of actions, statements, and activities including whistleblowing, conscientious objection, or raising questions to one’s supervisor related to harmful outcomes associated with an organization’s work or mere presence. It does not cover reports of organizational rule-breaking more generally.

The word dissenter is also deployed here to highlight the paradoxes of representation, constituency, professional obligation, as development and humanitarian workers are often described in role and function as playing a technical role in service delivery or program management, rather than adjacent

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8Stuart C Carr & Ishbel McWha-Hermann. “Expat wages up to 900% higher than for local employees, research shows,” Guardian, 20 April 2016.
social, governance, or economic roles. 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?

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. Development and humanitarian organizations—and the state, multilateral, and private donors that fund and partner with them—name local populations as primary constituencies. As Tom Kirk states in his review of Why We Lie About Aid: Development and the Messy Politics of Change, the reality is that, “aid currently has no permanent electoral constituency past those that work in the sector and a small number of committed idealists.”

While international humanitarian 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. Organizational 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 its own time, space, and economics.”

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.

A lack of focus on questions of civilian dissent, critique, or collective action regarding humanitarian and development interventions may falsely imply there is little research (or little to research) on these questions. On the contrary, 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.

One of the central goals of employing the term ‘dissent’ beyond ‘whistleblowing’ in this paper is precisely to develop a platform for research that centers civilian actions and responses to aid norms or power structures that are present in daily life, policies, institutions, or otherwise—even while the findings here focus on the experiences of insiders.

Methodology

Building on desk research in several areas listed below, twenty-four semi-structured, original, interviews have been conducted with humanitarian and development organizational insiders, associated researchers, journalists, and issue- experts. Interviewee profiles include: past or current insider-dissenters or whistleblowers, ethics and legal officers, journalists, researchers, and practitioners. 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 planning or practices 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 citing 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: (1) actions taken in response to individual dissenters, (2) administrative realities that explain or frame suppression of dissent, and; (3) 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.

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<tr>
<th>Area</th>
<th>Description</th>
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<tr>
<td><strong>Political economy of international organizations</strong></td>
<td>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 taxpayers and/or voters in donor countries. 11</td>
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<tr>
<td><strong>Whistleblowing and public interest</strong></td>
<td>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. Literature on whistleblowing additionally provides useful analytical tools with respect to checks and balances in holding powerful actors accountable. In this research, it is used to frame layers of organizational complexity that accompany dissent and whistleblowing claims in international organizations which do not occur or arise within individual states or nationally-bound private companies.</td>
</tr>
<tr>
<td><strong>Ethnographies and organizational culture in international aid organizations</strong></td>
<td>For this report, the literature on institutional ethnography in aid contexts is primarily grounded in Autesserre’s approach in <em>Peaceland</em> to analyze and document practices, habits, and narratives of intervenors. Additional literature for this section draws on the work of Catherine Weaver’s <em>The Hypocrisy Trap</em>, 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.</td>
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<tr>
<td><strong>Critical humanitarian and development studies</strong></td>
<td>Literature drawn upon here includes post-colonial theories of development, most centrally, Samir Amin’s elaboration of uneven development through Center-Periphery economic models, and Fassin and Pandolfini’s book on <em>Contemporary States of Emergency</em>. 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 states of emergency, albeit different in substance of practice.</td>
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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 internal armed conflict during 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, in organizations that span dozens to hundreds of jurisdictions which subsequently shape organizational complexity in terms of governance, protocol, and implementation of programs.

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, this research does not weigh the merits of those arguments in specific scenarios. 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 development and humanitarian 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 authoritarian or populist 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 humanitarian and development 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 have 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 such is ineffective at best, and a harmful reproduction of many of the harms they claim to remedy 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 insider-dissenters reinforces the erasure of many civilian populations who hold both grievances and optimism alike, but whose opinions are vastly absent outside those collected and synthesized by organizations themselves. In doing so, it may inadvertently present insider-dissenter concerns, considerations, and opinions as substitutes for or representative of those belonging to civilians.

Calculating dissent: How Insider-Dissenters decide 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 (specifically, losing access to them). The introduction of both words also triggered explanations from many interviewees regarding the debate over whether criticism of humanitarian and development aid is equivalent to seeking its abolition. The majority wanted it to be understood that they do not see critique as advocacy for abolition. Other interviewees, however, were very clear, naming aid (and the organizations operationally delivering it) 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. 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 revealed or enacted?

(2) What strategies are used to minimize the cost of dissent in personal terms and to maximize the possibility of substantive change in general terms?

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, violence, or misconduct.

The first of these narrowly construed areas of malfeasance, 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 workplace *and* with respect to provision of services to

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12 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.
dependent populations. It is difficult enough to report these forms of wrongdoing without the fear of retaliation or other consequences. However, a shared dilemma among humanitarian and development 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. The x-axis lays out areas where dissent is perceived as an option by and among aid insiders.

**Reporting Structural Harm: Perceived Options and Limitations**

<table>
<thead>
<tr>
<th>Direct harm</th>
<th>Options for Legitimate Dissent</th>
<th>Options for Protected Whistleblowing</th>
<th>Monitoring and Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acts of physical or sexual violence</td>
<td>Sometimes</td>
<td>Yes</td>
<td>Sometimes</td>
</tr>
<tr>
<td>Omission of details from reports which minimize harmful dynamics or outcomes</td>
<td>No</td>
<td>No</td>
<td>Sometimes</td>
</tr>
<tr>
<td>Causation or reproduction of trauma</td>
<td>Sometimes</td>
<td>No</td>
<td>Yes</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Structural harm</th>
<th></th>
<th></th>
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</thead>
<tbody>
<tr>
<td>Perpetuation of economic inequality through aid architecture</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Complicity with political repression or marginalization (by host governments, donor government, or powerful non-state actors)</td>
<td>Unclear</td>
<td>Unclear</td>
<td></td>
</tr>
<tr>
<td>Political or economic conditionalities that favor international communities over local communities</td>
<td>No</td>
<td>No</td>
<td>Sometimes</td>
</tr>
<tr>
<td>Complicity with discriminatory clauses in bilateral or multilateral donor grants</td>
<td>Sometimes</td>
<td>No</td>
<td>No</td>
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</table>

Minimizing the harmful impacts of graft and corruption in humanitarian development operations 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 potential insider-dissenters describe some of the deliberations on whether and when to take action related to perceived harm.

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[13] 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.
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, can it be reported?* Regarding internal channels, most respondents expressed the procedural or administrative difficulty or ambiguity of reporting issues internally, including where to report them. This was true for a number of situations they confronted outside those most standardly covered in international organizations’ ethics manuals, including specific references fraud, waste, corruption, though with broad or non-existent references to abuse, discrimination, and harassment. *Do Not Harm*, an oft cited principle, appears nowhere as a prompt for triggering other formal procedures in the event of its violation.

*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). Beyond concerns about individual supervisors, reporting chains and processes were sometimes unclear, including a combination of ethics offices, supervisors, and human resources employees in offices in different countries.

*What will the consequences be if media is involved?* 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**

*How will this affect 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. Beyond losing one’s job, more subtle programmatic considerations also applied. For example, an individual raising questions of harm might have the effect of shutting down or compromising entire programmatic areas beyond those where harm is named. Alternatively, where host governments have placed tacit or overt boundaries for program operation, naming situations in which these boundaries are crossed may create or exacerbate undesirable tension with host governments or influential actors.

*If everything is a tradeoff, is it worse to act or not to act?* As insiders, most interviewees expressed reluctance to act when they identified various kinds of harm, citing uncertainty about additional information they may not have been able to fully consider as part of a broader harm-tradeoff calculation. 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, “The politics of donors also played out at the level of the war. All the decisions were locked behind one person, and his disciples... you don’t want to tear down all the good people who are working there by
speaking about the one causing problems...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, explained that they often deliberated on the question of whether anything would change if they did decide to pursue these issues more openly. 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.

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

Gauging integrity of process and key decision-makers or political actors

How do I know if informal or formal channels are better here? 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 in official organizational policy 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 reporting process integrity and weighing the costs of potential retaliation against the possibility of information suppression (and dismissal of claims) factored significantly into individual decisions.
**Who’s who 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 interviewees informally map 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 gatekeepers, and associated dissent considerations, the above informal mapping is significantly more complex as the number of intermediaries and decision-makers through which they must operate far surpasses full-time employees and is often more distributed (as opposed to linear) across offices and countries. Paired with fewer contractual rights and greater job precarity, sub-contractors engaging in informal complexity mapping do so with a slightly different set of calculations and agents in mind.

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**Likelihood of omissions in program, planning, or evaluation reporting:** Several interviewees reported that it was far more common to leave out important information than it was to manipulate or insert false information. A common dilemma among humanitarian and development 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 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, and according to my observation, relies on everyone doing the right thing.”

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**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 described active or passive strategies they used* 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 overt retaliation or more subtle intimidation ensued. Strategies undertaken were described mostly in passive terms, due to what interviewees described as a process filled with surprises and unexpected twists they often navigated through trial-and-error. Thus, the ‘strategy’ only felt like one in hindsight if it could be described that way at all.

Overall, strategies undertaken 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.

### Types of dissent strategies undertaken by humanitarian and development insiders

<table>
<thead>
<tr>
<th>Strategy</th>
<th>Legal/Procedural</th>
<th>Advocacy</th>
<th>Alliances or Collective Action</th>
<th>Subversion</th>
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</thead>
<tbody>
<tr>
<td><strong>Reliance on veterans and mentors</strong></td>
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<td>X</td>
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<tr>
<td>Internal dissenters and whistleblowers become informal experts in organizational 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 resources, advice, and support.</td>
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<td>Alternatively, there are long-term humanitarian and development workers who learn through observation and remain in their roles 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). In doing so, they also evade or bypass the title of dissenter or whistleblower. More junior colleagues frequently seek their advice as well.</td>
<td></td>
<td>X</td>
<td>X</td>
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<tr>
<td><strong>Sequencing</strong></td>
<td></td>
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<td>X</td>
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<td>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 and Skypes from colleagues inside the organization forwarding my own writing back to me saying things like, ‘You have to check out this other thing…”’</td>
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<td>Media engagement tends to be a last resort: Potential dissenters and whistleblowers feel they engage in serious risks</td>
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Sequences: In most cases, strategies unfolded over time; often, they happened sequentially, not all at once.
when they engage with the media. Unless they have an established trust relationship with a specific journalist, there is widespread reluctance to go to the media first, or even during internal processes—often described as a last resort or non-option.

**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 or ‘making too much noise’. There is a strong sentiment that the cards are overwhelmingly stacked against dissenters due to a lack of independent or external oversight.

<table>
<thead>
<tr>
<th>Indirect or subversive approaches</th>
<th>Legal/ Procedural</th>
<th>Advocacy</th>
<th>Alliances or Collective Action</th>
<th>Subversion</th>
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<tbody>
<tr>
<td>Redirecting accusations of harm or risk: Converting external harm considerations into organizational risk considerations by citing an organization’s bottom line or media reputation were common dissent strategies</td>
<td></td>
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<tr>
<td>Redirecting power or resources within institutional boundaries: For those with internal authority to do so, some named redistribution of funds, for example those normally captured by top ten contractors, toward capacity and resources for smaller organizations with long-term stake in a place or issue.</td>
<td>X</td>
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<td>Circumventing conflicts of interest: More experienced dissenters had strategies for circumventing conflicts of interest inherent in some aspects of organizational reporting channels or individuals they felt had too much discretion over specific issues.</td>
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<tr>
<th>Flipping the focus of metrics onto institutions</th>
<th>Legal/ Procedural</th>
<th>Advocacy</th>
<th>Alliances or Collective Action</th>
<th>Subversion</th>
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<tr>
<td>Create independent, grassroots complaint and dissent monitoring systems: Some dissenters revised metrics from those focused on technical successes and failures of individual projects, to metrics focused on an organization’s overall role in shaping or influencing economic, social, or political balances of power, “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.”</td>
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Those who pursue formal proceedings or experience informal retaliation began documenting exchanges far before overtly dissenting or raising questions. This includes recording
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<tr>
<th><strong>Documentation and evidence-gathering</strong></th>
<th>conversations, taking prolific notes during and following meetings, and creating dual email inboxes to record email exchanges and other correspondence or documents.</th>
<th>X</th>
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<tr>
<td><strong>Citing state-level legal precedents, or international law</strong></td>
<td>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, as one example. One interviewee 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.</td>
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<tr>
<td><strong>Soliciting international state and non-state actors directly</strong></td>
<td>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.</td>
<td>X</td>
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<td></td>
<td>Mobilizing support and alliances of INGOs in close physical proximity to international secretariats or headquarters</td>
<td>X</td>
<td>X</td>
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<td></td>
<td>Going to interested [and often partisan] media in countries with strong political influence.</td>
<td>X</td>
<td>X</td>
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<td></td>
<td>Attending conferences and roundtables in international cities where high-level decision-makers are present, in order to bypass transnational reporting chains, gatekeepers, or physical distance.</td>
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Organizational responses to principled dissent

How do organizations respond administratively, narratively, and procedurally, to principled dissent among humanitarian and development 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 as described by interviewees. 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 dissenter;
2. Internal administrative complexity that obscures or dilutes the strength to or clarity 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 become scandals, then they were dealt with as exceptional cases, while the culture that enabled them 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 and mitigate principled dissent, deterrents and punitive action appeared far more common. The most common incentive, or carrot, named by interviewees included offers of promotion—which most felt were offered in exchange for their silence. Deterrents and punitive measures named, greater both in variation and frequency, 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. While some of these contractors are employed on a full-time basis, their contracts require regular renewal and they often lack the same benefits and legal protections as full-time employees. Others are hired for short-term positions or functions. Many interviewees described the threat or reality of non-renewal of contracts—whether long-term or short-term contracts—as a response to dissent. However, the ability to separate retaliatory non-renewals from legitimate non-renewals was described as difficult due to the common use of contractors (along with their non-renewal as such) in international organizations.
Placing employee on probation or under investigation for procedural infractions: When insiders dissent, they named retaliatory investigations, often focused on procedural infractions or violations, as a common occurrence. Practitioners, legal counsel, and ethics officers interviewed for this research 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 by loosening or tightening the terms of investigation based on compliance.

Placing 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 internal dissent at a certain threshold, or whistleblowing.

Red-listing or black-listing: Among the unwritten rules one can expect for speaking out of line or challenging institutional norms on ethical grounds, even when citing direct contradictions or violations of an organization’s stated values or mission, is red-listing or black-listing of insider-dissenters. 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. In an industry where “everyone knows each other,” informal exclusion can happen seamlessly. According to one interviewee,

“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. I [became known as] a troublemaker. I’m red-listed by several organizations.”

Transfer to remote posts: Isolated from organizational headquarters, high-level decision-makers, or which distance dissenters from their everyday lives, transferring insider-dissenters was described by some interviewees as an organizational response they had seen or endured. Sometimes assigned posts even posed specific dangers. One interviewee was transferred to a post in a country which they had publicly and regularly criticized for its poor human rights record during and following a military takeover, 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, and under threat of state retaliation for their public comments.

**In/FORMAL ISOLATION, PSYCHOLOGICAL MANIPULATION, AND INTIMIDATION**

**Subtle or rapid allegations of poor performance:** People who dissent or raise ethical questions related to structural or specific harm are slowly or suddenly confronted with reports of poor performance by immediate supervisors.

Placing 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 internal dissent at a certain threshold, or whistleblowing.
Summoning dissenters to last-minute, closed-door meetings with no information, preparation, 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, insider-dissenters:

- 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.
- Had varied experiences in whether they knew or were told exactly what prompted the meeting.
- Were told to sign additional confidentiality and non-disclosure agreements, beyond those signed as part of initial employment contracts. These agreements often prohibited them from discussing anything from these meetings (or what followed) with their colleagues, and sometimes even prohibitions related to seeking external counsel.

Seizing or surveilling employee communications: Some interviewees noted that organizations installed digital auditing software to monitor all current and past work communications, including email and phone. A small group of interviewees explained that their computers and work-related devices were seized, including mobile phones, hard copies of reports in their physical workspaces, and anything that could be considered property of the organization. One interviewee explained, “Human resources seized my computer and conducted a forensic scan. They thought they would find gambling or porn, which you could get fired for.”

Instigating personal and/or professional doubt about insider-dissenters among their colleagues: Supervisors or other team members subtly (or directly) encouraged work cultures that cast doubt on the insider-dissenter’s capacity or judgement for being trusted or for being able to carry out competent work. This often took place in mundane spaces, 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.

Overt or indirect threats of blackmail: “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.

Active avoidance by insider-dissenter’s colleagues: Several interviewees stated that their colleagues started avoiding 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.

Overt or indirect gaslighting | ‘if it is not documented, it does not exist’: Insider-dissenters are sometimes told by supervisors or human resources representatives that they imagined entire
conversations or misunderstood previous statements, “Yes, there are policies in place, but a lot of their execution is happening just between people.”

Normalizing harmful actions or phenomena to create employee self-doubt: Insider-dissenters are told that actions or processes they describe as harmful or problematic are normal. Most interviewees responded that if this response was given, at first, it was ignored but over time their own self-doubt began to rise.

Arguing the 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 a colonizer. The international aid system owes to people in South.”

Using paid medical leave to cope with stress: Several interviewees needed to go on medical leave due to the stress of intimidation and retaliation. Some sought this option on their own while it was informally ‘prescribed’ to others.

DISTRACT AND REDIRECT

Organization or supervisor shifting emphasis of organization-employee interaction from substance of organizational harm raised by employee toward employee breach of administrative protocol: One tactic named repeatedly was organizational or supervisory conversion of conflict over principle or practice centering the organization’s (or one of its representatives) conduct into an administrative back-and-forth centering the employee’s conduct. This pattern of deflection was named across all bilateral, multilateral, and non-governmental organizations. Two repeatedly cited administrative accusations directed toward insider-dissenters included violating confidentiality clauses from contracts or accusations 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 by the respondent quoted above about widespread pandering to donors and the lack of ability to use resources for local populations needs as a result, the consequence was behavioral reprimand.

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 paperwork: 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 or recover their job.

Internal/Administrative
While the previous section highlighted organizational responses taken toward individual insider-dissenters or whistleblowers, the following section describes organizational explanations or administrative architecture which obscures, preempts, or suppresses avenues for dissent from arising in the first place. The previous section similarly outlines active actions taken by organizations, or individual human resource or supervisory representatives of those organizations, in response to perceived or actual internal dissenters. This following section highlights structural realities within organizational charts, and associated reporting or harm or liability reduction protocols, that enable minimizing or obscuring the naming of harm to begin with.

**DIFFUSION OF ADMINISTRATIVE PROCESS OR DEFLECTION OF ADMINISTRATIVE RESPONSIBILITY**

Rationalizing harm as an inevitable tradeoff (and cost) of doing good in complex situations with dozens of actors working toward or at odds with one another: Alternatively, this justification is rationalized by a stated diffusion of responsibility.

“Indicators are usually very vague. It’s almost impossible to find a causal relationship between any one organization’s decisions and 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 counterterrorism, 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 or removes individual organizations from direct responsibility for harmful outcomes.

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“**It’s normal, this is how things work**”: This response was regularly 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.

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**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 engage an insider-dissenter’s question or claim, involved stating that ‘violations of a principle are not violations of a rule.’ Therefore, no protocol could be activated without specific rule broken or nameable infraction committed. When principled dissent sought to invoke Do No Harm, insider-dissenters were sometimes told that no accountability mechanisms could be triggered,

“**When I first went to Human Resources 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.”**

---

**Bureaucratic and administrative complexity obscures clarity of and critical differences between channels for 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 procurement processes. The states and general publics within those states to which those IOs are supposed to be accountable are a patchwork overlaid onto the existing bureaucratic and administrative complexity. 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,”

This interviewee then went on to explain that none is independent from the institutional interests they represent.

**Muting or minimizing questions as information moves up through the organizational hierarchy or decision-making chain:** There are two ways in which internal reporting allows for passive muting of principled dissent as [reports] are shared up through reporting chains.

1. **Passive and 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 widely muted or diminished messages.

2. **Active and ad hoc.** This response involves 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 risks to organizational integrity or reputation, “First you have to report it to your supervisor, then someone more senior, then within the recruiting agency or organization. Once you have exhausted these options, only then can you go outside.”

Considering the widely perceived conflicts of interest that appear in reporting chains at every step of reporting, insider-dissenters often don’t see these chains as viable options for conveying their concerns.

**Regular staff turnover often renders continuity of internal 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-specific dangers, expatriate managerial staff are based in an entirely separate country. Expatriate and some national staff working ‘in Somalia’ are often based in Kenya. Expatriate and some national staff working ‘in Libya’ are often based in Tunisia. Expatriate and some national staff based ‘in Syria’ are often based in Jordan. Apart from the neocolonial arrangement, the constant rotation of staff in and out of each country renders sustained or continuous dissent almost impossible, especially if it applies to the delayed impact or aftermath of a single organization’s role, or alternatively, the cumulative impact 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 insider-dissenters in support of their questions or claims, there are often competing alternative policies located in another part of the organization’s internal protocols that can be counter-cited by organizational administration or human resources.

**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 on the same issue. 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 movement, 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 organizations signal reform. These practices may lead to, or trigger, internal reform, though short of external oversight and practical analysis, it remains unclear when, how, and on what terms these signals are accompanied by actual reform.

Interviewees described varied organizational public 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 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 organizations, multilateral organizations, and organizations focused both on development and humanitarian work. 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,
“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.”

Commit to reforms at/through conferences, roundtables, and working groups: *Mea culpas* and commitments to reform alike are increasingly common in conference arenas, far removed from the contexts in which they occur or in front of populations capable of validating or attesting that needed shifts are being honored. 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 as well.

“There are millions of dollars invested now in the superstructure of the industry…in conferences, agendas, planning, and learning. It ripples out and repeats.”

In these fora, raising and responding to critical conversations about international humanitarian and development 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 individual or 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 that ultimately drive, produce, and manage them. 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.’” What remains absent is linking project-level patterns with broader organizational norms, decision-making processes, or independent verification of findings which would allow for correction for systemic failures, particularly if and when they are masqueraded as project-level failures.

Double standard on norms applied to external program and internal operation: “I was hired to evaluate a major international humanitarian organization’s application of *Do No Harm* in one country. ‘Does the driver follow the rules? Does the staff act privileged to local organizations?’ The staff was actually applying *Do No Harm* within the organization. They were asking why salaries for people in country with PhDs were hundreds of dollars when 24-year-old expatriates had salaries of $10K. When the London representative came and I began explaining their approach, she cut me off and said, ‘How is this relevant? 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 vis a vis the calculations and strategies of both insider-dissenters and the international humanitarian and development organizations they work for -- both in naming and responding to real or perceived structural harm or wrongdoing.

This report concludes by discussing core trends and calculations that characterize the back-and-forth between insider-dissenters and organizational leadership, the dilemmas and tradeoffs in which individual and organizational decisions take place, and a list of institutional or political barriers and enablers which perpetuate these norms even while individual cases may gain significant attention.

Ultimately, the findings and conclusions below aim to highlight structural barriers to accountability and offer alternatives that go beyond de facto institutional self-regulation.

1) Individualization of systemic issues: Emphasis on technical solutions to political problems
   - Agenda and program design converts political problems into technical questions
   - Associated individualization of systemic problems as core to implementing ‘solutions’

2) Uneven/inconsistent power dynamics in system design and rule arrangements
   - Conflict of interest in/through investigative, oversight, and strategic decision-making roles
   - Highly concentrated vertical accountability, with few horizontal processes

3) Normalized self-regulation and lack of independent or grassroots oversight
   - Sparse in-depth and independent media coverage of humanitarian and development field or organizations across borders, apart from scandals
   - Decentralized or competing accountability protocols and jurisdictions enables highly individualized discretion by the person in/formally engaging the claim

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 may be, and frequently are, 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 humanitarian and development 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 use. Would-be dissenters have little information about what to expect if and when retaliation is experienced as principled debates quickly become administrative competitions, in which principled dissenters are immediately set up to fail.

Across organizations, emphasis on individual organizational scandals leaves organizational 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 humanitarian and development interventions interact with, change the dynamics of, and contribute to political and economic realities of everyday people.

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 these same organizations from receiving individual 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, 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 (commonly defined in terms of fraud).

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 insider-dissenters present or question these issues, the largely self-regulating machinery of different organizations is set in motion unless dissenters seek external support or quickly finds an executive ally.

Media may naturally fill a gap here, providing external coverage absent some of the challenges that accompany internal self-regulation.

Journalists inside media organizations, however, also face hurdles internally on three levels:

1. Collecting sufficient documentation, sources, and evidence across extremely complex institutional arrangements in several countries;
2. Convincing editors that stories are worthwhile, and;
3. How to make those stories relevant to the reading public they write for.

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. One reporter explained, "Part of the reason that more media doesn’t shine critical light on or cover the UN critically is because the UN cuts off access when they do. The difference at the UN is that there are no voters to the UN. These institutions are at arm’s length from constituents. Going back to the tax-payer issue since 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 regarding the UN, they explained, "Media in the US is very partisan. It reflects the divide in Congress and then 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 sectors in their countries as foreign agents, advanced to justify widespread closures, censorship, or
even imprisonment of activists, journalists, lawyers, and other civil society members exercising their civil and political rights of dissent in their own countries. Media and international civil society have expressed reluctance to raise a critical eye on international organizations in environments of severe political repression. Several journalists 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 or reputational integrity. 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 humanitarian and development insiders get caught in or succumb to navigating the informal rules that dictate which norms can be questioned or which harm can be named, they still remain in positions of relative power compared to civilians whose opinions and preferences often may not extend past the project-level, let alone make it to Geneva or to their own governments or national oversight bodies. 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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