

RESEARCH PAPER



Time for Change: The Normalization of Corruption and Diversion in the Humanitarian Sector



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Executive Summary

This paper explores aid diversion and corruption. It argues that, although the aid sector often treats corruption and diversion as an anomaly, they are pervasive, systemic and often unwittingly perpetuated by standard aid sector practices. Drawing primarily on evidence from Somalia and Afghanistan (with reference to other contexts), this paper explores the specific aid practices that enable and perpetuate corruption and diversion, and what donors and implementers should be doing differently.

Key Practices

Through the lens of Somalia and Afghanistan, we examine how the application of five key practices in these (and other) contexts can create perverse incentives and inadvertently further diversion and corruption.

- 1. Targeting:** While targeting aims to ensure aid reaches those who need it most, the ways it is practiced are vulnerable to external pressures, hidden agendas or subversion. As we illustrate in Somalia and Afghanistan, targeting practices can also unwittingly exacerbate conflict dynamics, underlying inequalities or opportunities for exploitation. Part of the problem is that aid workers tend to treat targeting as a technical exercise, when it is in reality profoundly subjective and politicised. One cannot ensure aid reaches those who need it most without engaging with local politics, norms and agendas.
- 2. Rapid scale up:** The short funding cycles that characterise humanitarian response create inefficiencies and incentivise diversion. In rapid scale-ups in particular, aid actors are pressured to quickly expand, hire new staff (who may be inexperienced, requiring mentorship and training to work ethically and effectively), and spend funds according to unrealistically short timelines (which disincentivises pausing operations or reporting issues when problems arise). In reality, entering new areas – or even expanding in existing areas – takes significant time and resources. Such rapid scale-ups often prioritise timeliness over quality, in part due to the incentives to mobilise resources. Providing longer funding horizons could, in principle, limit opportunities for diversion and corruption, and generally improve the efficiency of such responses.

- 3. Subcontracting:** In volatile contexts, the aid system is characterised by onion-like layers of subcontracting, with primary funding going to UN agencies, who then subcontract the work onto various international and national NGOs. Overall, this increases risks of diversion and corruption, depriving frontline implementers of the decision-making power required to implement appropriately. It often creates a 'don't ask, don't tell' mindset, pressuring implementers to deliver at all costs. Greater investment in credible local organisations and real partnerships could counteract some of this, but progress on enacting the structural changes required to localise has been extremely limited in Afghanistan, Somalia and other chronic conflicts.
- 4. Armed protection:** Armed protection and armed escorts, once seen as last resorts, are now standard practice across many contexts. The use of armed escorts can unintentionally facilitate aid diversion, manipulation of assessments, and influence aid distributions. This practice also tends to empower criminal or armed groups and fuel war economies, violating the long-standing principle of do no harm and emboldening those who would seek to divert or capture aid.
- 5. Third-party Monitoring (TPMs) and the manipulation of information:** TPMs, also once seen as a last resort, are now an entrenched practice. They are often seen by donors as essential to mitigating corruption, but they can also act as another entry point to enable corruption and diversion. Monitors' lack of experience and ability to negotiate external pressures can result in collusion. TPMs often provide a tick-box approach to monitoring, increasingly focused on remote methods (such as call centres). They also face pressure to report that things are being implemented properly – regardless of the reality. TPMs can be part of a wider political economy of aid information in protracted conflicts.

Barriers to Change

Few of the problems outlined in the report will surprise aid workers or donors. Indeed, numerous studies have documented the various issues this report raises. Yet the problems discussed, and the harm they create, continue largely unaddressed. This paper is written with the hope that more honest discussions about the internal drivers of diversion and corruption may lead to concrete changes to the incentive structures driving these practices.

The roots of the issue are structural. The emphasis on technical approaches to diversion and corruption, without appropriate contextualisation, is a common theme. Again, this is not a new dynamic. However, aid diversion and corruption cannot be understood outside of the historical, social, and political contexts in which they occur. As with targeting, the focus on technical standards and one-size-fits all approaches tends to obscure how they may be subverted by the underlying politics and political economy of aid. 'Bunkerisation', frequent rotation of staff and poor institutional memory also mitigate against learning and change.

A more alarming aspect is the growing reliance on practices first employed as imperfect, last resort options in hostile environments, such as TPM, subcontracting and armed escorts. These coping mechanisms are now the status quo. It is perhaps not surprising then that their normalisation has created such dysfunctional outcomes and perverse incentive structures.

There is a growing sense that the frameworks meant to guard against corruption and diversion and uphold common principles are falling short. The aid system has reached a crisis point, yet many donors and aid workers are reluctant to admit this. This has arisen, in part, because governments deploy humanitarian aid as a bandaid for political and military failures. This puts aid actors in impossibly precarious situations with little bargaining power or leverage over those who wish to manipulate their work. Part of the way forward undoubtedly lies in aid implementers saying no or stopping work when aid cannot be delivered in an appropriate or ethical way.

The trouble is that the current incentive structure of the aid economy strongly discourages and even punishes such action. With the professionalisation of the aid sector, a mentality of corporate growth over do no harm principles and longer-term deleterious impact, has come to dominate the larger UN agencies and international NGOs. This becomes problematic when donor contracts and organisational metrics of success prioritise volume of aid delivered and money spent over impact and quality. In the current environment, to admit you cannot deliver without doing some degree of harm is likely to result in a loss of funding and credibility.

Ways Forward

There is no tick-box approach to addressing the often structural drivers of this crisis. But the analysis in the paper suggests several entry points to changing the incentive structures:

- ▶ Greater investment in harder accountability measures, such as independent accountability mechanisms, investigations, and disciplinary consequences, starting with a focus on international agencies (too often, local actors become the scapegoats for wider systemic problems).
- ▶ Consolidation of the multi-layered implementation modality e.g., UN-International NGO-Local NGO-TPM would improve efficiency, empower frontline implementers, and reduce entry points for corruption and manipulation of information.
- ▶ Investment in credible local/national actors would help reduce implementation layers, increase efficiencies and support the localisation agenda.
- ▶ Prioritisation of strategic analysis and decision-making that considers the longer-term impact of aid on conflict dynamics, societal harm and the integrity of international aid itself.
- ▶ The humanitarian sector needs to be more willing to suspend and reduce aid operations and to shrink budgets, based on more realistic analyses of the political economy of aid operations in national and local contexts.

1. Introduction

Aid diversion and corruption (further discussed and defined in Section 2) are causing growing concerns within the aid community. Several donors and aid agencies paused aid to Ethiopia in early 2023 after large-scale aid corruption and theft were uncovered.¹ The following September, the European Union (EU) temporarily suspended some food aid programming to Somalia after widespread theft and post-distribution kickbacks were revealed.² In October, the United States Agency for International Development (USAID) paused some of its Yemen funding to push back on entrenched Houthi control over aid delivery in its areas of control.³ In Afghanistan, there is increasing concern about the Taliban's growing interference in aid operations, with a new caveat in the budget appropriations bill meant to guard against the government benefiting from foreign aid.⁴ Again, none of these issues or concerns is particularly new. But these cascading scandals across several highly aid-dependent contexts, amid cuts to global humanitarian funding, present an opportunity to discuss what should be done differently.

Our starting point is to acknowledge that aid diversion and corruption are not an aberration but are a long-standing norm within international aid operations. They are both driven by and sustained by certain practices and decisions within the aid system. Based primarily on the authors' combined decades of research on aid corruption, diversion and related issues, this paper explores how the systems set up to ensure aid reaches those who need it the most can unwittingly further diversion, entrench corruption, and discourage accountability. The paper begins with a discussion of the aid sector terminology and related issues around diversion and corruption, and the role that contextual drivers and historical patterns play. The paper then discusses five key aid system practices which enable diversion and sustain corruption, before concluding with a discussion of the barriers to change.

1.1 Scope and Approach

While primarily focusing on Afghanistan and Somalia, this paper addresses issues prevalent in aid operations globally, not just within these two countries. The choice of these particular contexts stems from the authors' expertise and the historical and contextual parallels between them. Both countries have experienced prolonged crises and have been recipients of substantial aid since the late 1970s, offering insights into the evolution of patterns and drivers of aid diversion. Additionally, the paper draws on experiences with diversion in other crises, including Sudan, Yemen, and Ethiopia, to illustrate the systemic nature of these challenges. While acknowledging the contextual differences, the paper emphasises the need for the aid community to approach these issues systematically and holistically.

While this paper primarily examines the humanitarian sector, it refers to other funding streams because many of the dynamics and practices discussed are also found in development and other sectors. In particular, the dominant role of the UN in managing and subcontracting funds, and concerns of its limited transparency and accountability, is a recurring theme. Furthermore, many conflict-affected areas receive a blend of humanitarian and development funding and other types of financial support reflecting the intersection of corruption and diversion issues across all forms of aid. The criteria for determining the kind of funding provided are often influenced by a complex interplay of factors, including needs but also donor political objectives and constraints. For instance, following the Taliban's takeover in Afghanistan, there was a notable shift from primarily development aid to almost exclusively humanitarian aid (partly to avoid support to the government and circumvent counterterrorism laws and sanctions). In contrast, Somalia has seen a steady increase in development funds in recent years, although about half of all Official Development Assistance (ODA) remains humanitarian in nature.⁵

2. Understanding Aid Diversion and Corruption

Discourses around aid diversion and corruption are multi-layered, complex and often confused, with different actors seeing and labelling the problem differently. The EU defines **aid diversion** as “aid taken, stolen or damaged by any governmental or local authority, armed group or any other similar actor.”⁶ Simply put, diversion happens when aid does not reach those aid actors the donors intend it to. This can result from a wide range of factors and practices, including bribes and kickbacks, aid theft, bad weather, and other kinds of disruption or delivery delays. Insurgencies or militias may seek to capture aid to enhance their own legitimacy, and fund their war efforts. That said, aid diversion is not always driven by greed or other nefarious motives. Community members may, for example, disagree with how aid agencies have distributed aid, and then proceed to seize or subvert aid so that it may be distributed in ways they deem fairer or more appropriate.⁷

So while aid diversion is often conflated with corruption, they are not necessarily the same thing. Transparency International defines **corruption** as “the abuse of entrusted power for private gain.”⁸ Corruption, unlike aid diversion, is by definition, self-serving. For example, when armed groups loot warehouses full of food and supplies, that is aid diversion. When an UN employee solicits a bribe in exchange for granting a contract to local NGO, that is corruption. Some instances may constitute both diversion and corruption. For instance, when internally displaced people are forced give a third of the aid they receive to local authorities and another third to aid agency staff.

The trouble is that different motives can overlap or be otherwise difficult for an outsider to discern. External actors (armed groups, government officials, community members), as well as internal actors (aid workers), may be the culprits or collude with one another. Nevertheless, understanding motive and the complex relationships at play helps us differentiate between diversion patterns, distinguish the particular factors that drive them, and – most importantly – figure out how to effectively address the problems.

Two additional issues often get muddled in discourses around aid diversion and corruption. The first is the extent to which a governing authority can, or should, have a say in how humanitarian or other forms of aid are programmed and delivered. UN General Assembly Resolution 42/182 states that aid should be provided “with consent of the affected country” and “in principle on the basis of an appeal by the affected country.” This **right of control** is vague and contentious.

Nevertheless, it allows national governments to deny aid workers access to areas within their territory and to regulate their work within it. This becomes particularly problematic in pariah states like Afghanistan (where the government isn't internationally recognised but is the de facto authority responsible for overseeing aid), in areas beyond state control such as in Yemen (where the Houthis exercise de facto authority) and in states like Pakistan and Sudan (where the government is seen as obstructing aid access for political purposes). Conversely, in states like Somalia, because the government does not exist in certain places or has only limited reach, it has very limited ability to exert control or influence over aid in practice.

The second issue pertains to the **unintended benefits of aid**. This is often muddled up with diversion in contexts where donor governments are politically opposed to the government or de facto authority, and do not want their aid efforts to further empower them. This is evident in aid responses to the Taliban in Afghanistan or in Houthi-controlled areas of Yemen, for example, where diversion might be tolerated or highlighted depending on political expedience.

The issue of **fungibility** is linked to this. Fungibility pertains to whether aid interventions relieve such governing authorities of the burden of providing essential services, allowing these actors to devote their resources to other priorities. In state-building contexts, fungibility tends to be less of an issue. In Somalia, for example, donors tend to see support to the government that allows it to do more with its resources as a good thing. But it is seen as more problematic in contexts where providing healthcare frees up a pariah state to devote more of its resources to military expenditures.

As this suggests, aid diversion and corruption are, to some extent, relational. Much depends on the underlying context, historical patterns and precedents, and the geopolitical positions of donors. While donors and aid organisations may proclaim that there are clear red lines, ground realities are not always so black and white. Additionally, some contexts receive more scrutiny than others, and the standards applied to diversion and corruption in one place or time may not be the same as those applied elsewhere.

3. Understanding Context

Aid diversion and corruption cannot be understood in isolation from the political, economic, and historical context in which they occur. There are three essential elements of this context to consider: conflict dynamics, geopolitical alignments, and historical patterns of aid diversion and corruption.

It has been long acknowledged by aid workers that certain practices may unintentionally exacerbate or perpetuate **conflict dynamics** and the wider war economy. Amid violent conflict, the distribution of aid becomes yet another arena for power struggles. Various factors, such as political agendas and identity politics, shape how aid is controlled and distributed. The manipulation of aid serves multiple purposes: it can be a tool for groups to expand their influence, control territories or people, and manage resources. Conversely, withholding aid can be strategically used to inflict suffering on 'enemy' populations, undermining their morale, and to harm or manipulate civilians. This is further explored below, with particular emphasis in the section on targeting (Section 4.1).

Alongside this, **geopolitical alignments** shape patterns of diversion, how it is perceived, and how much of it will be tolerated by donors and aid organisations. One should be careful in conflating commonalities across different contexts. But in many other chronic crises – including Ethiopia, Nigeria, South Sudan, Sudan and Yemen – present day dynamics around aid politicisation, corruption and diversion can be traced back to the Cold War. In the late 1970s and 1980s, Afghanistan and Somalia found themselves embroiled in conflicts deeply influenced by Cold War politics. Aid as soft power was thrown behind factions that the US or their allies wanted to empower in the guise of humanitarianism. In Afghanistan, aid openly went to mujahedeen factions both in refugee camps in Pakistan and in cross border operations. Aid frequently disappeared (40% by one estimate), and diversion was typically either covered up or ignored.⁹ In Somalia, corruption on a vast scale was tolerated, with the national government, whose President was skilled at exploiting geopolitical divisions and using the threat of state collapse to inhibit the withdrawal of aid.¹⁰

The War on Terror was in some ways a variation on this, with massive flows of aid devoted to propping up or strengthening fragile and corrupt allied governments in foreign countries. The past two decades have been characterised by the use of aid as a band-aid for intractable political dilemmas and as a tool for propping up friendly governments. This has been accompanied by an implicit tolerance for significant levels of aid diversion, corruption and waste in donor contexts where the primary donor aim is state-building or counterterrorism (or some combination of the two).

In contemporary Somalia, concerns about aid reaching Al Shabaab are given much greater attention than corruption and aid diversion in Government-held areas. Similarly, donors tolerated widespread corruption in Republic-era Afghanistan, justifying this as the cost of delivering state-building and security. Support to the Sudan People's Liberation Army (SPLA) in southern Sudan during the civil war, prior to independence, is another example of how political expediency entrenched corruption.

As demonstrated by the Taliban takeover of Afghanistan, however, this tolerance can rapidly disappear as politics shift. Given the non-recognition of the Taliban government and the general antipathy toward their stance on human rights, donors and aid organisations feel immense pressure to insist that no aid is being diverted to or otherwise benefits the Taliban government. Meanwhile, deeply suspicious of aid workers, the Taliban government is increasingly seeking to control aid organisations and programming.¹¹ Ironically, corruption and aid capture is likely lower than it was under the Republic. Aid workers nevertheless find themselves caught between donor restrictions and Taliban government demands.

At the same time, shifting geopolitics tend to mask the fact that certain **historical patterns and practices** persist. Unchecked diversion and corruption create a precedent for further manipulation, as evidenced by the deeply ingrained cultures of aid corruption and diversion in both Somalia and Afghanistan. It should be no surprise then that, despite various technical attempts to mitigate this damage, they remain deeply entrenched. One respondent to a 2016 Somalia corruption study pointed out that addressing corruption in Somalia is not merely a question of "monitoring it away," while another used the analogy of a balloon: "If you squeeze it, it will pop out somewhere else. If you want to, you can always outsmart the mitigation system we've put in place."¹² (One caveat here is that micro-level histories and dynamics are also important to consider. In Afghanistan, the patterns of collusion and capture of food aid in certain districts under the Taliban look remarkably similar to patterns of capture and collusion in those districts under the Republic.)

To help make sense of the complex drivers of aid diversion, it is useful to think about two separate but linked categories: **structural drivers of diversion**, and **drivers of ad hoc diversion**.¹³ As discussed above, structural drivers of diversion are a by-product of the broader politicisation of aid efforts and underlying drivers within aid programming itself. While some cases of diversion are essentially ingrained in the politics, practices, and foundations of how aid is delivered, others emerge in ad hoc ways at the local level. Especially in conflict contexts, where authority is often fragmented, the dynamics of aid allocation and delivery are heavily influenced by hyper-local dynamics, personalities, and politics.

4. Entry Points

The crux of the matter is that diversion and corruption happen at various scales and through different avenues—be it funding sources, operational methods, or specific programs. Moreover, the system set up to administer and manage aid at times unwittingly supports and abets corruption and mismanagement, from modes of delivery to oversight and monitoring. These are the entry points that our study aims to explore in depth.

4.1 Targeting

One of the most common corruption-related risk areas concerns the selection, registration and targeting of aid recipients.¹⁴ Humanitarian targeting should, in theory, be undertaken on the basis of need. Targeting manuals and associated training programmes tend to be based on generic and technical language and notions, neglecting political and social factors.¹⁵ But these 'technical' criteria are more subjective than most aid workers like to admit, and can be grounds for contention and capture by local authorities, armed groups, community members and even aid workers themselves. Attempts to manipulate targeting are widespread in crisis contexts, and the degree to which they are mitigated is highly variable.

Appropriate targeting initiated by aid workers may be diverted to certain geographic areas or population groups (e.g., tribes or clans) by local forms of authority thereby excluding others. Local authorities (government or customary) may put pressure on aid workers to favour their supporters. But the problem can also arise internally, with the social identities and affiliations of particular agencies or their staff resulting in the capture or diversion of distributions and programming. Greed and self-interest can also play a role, especially where aid workers demand kickbacks to skew the results of assessments or to profit from aid programmes. In Somalia, the aid sector essentially replicates and may even intensify underlying socio-political inequalities and power hierarchies. These societal inequalities reflect historical processes of urbanisation, education and migration, where members of more powerful groups (i.e., clans) have disproportionately benefited from such processes and opportunities. These clans tend to dominate employment in the aid sector, including in the ownership of local NGOs. While this has been increasingly recognised as problematic, limited concrete action has been taken to address the issue.¹⁶

In Afghanistan, interviewees often described assessments as competitions, with people using their connections to get themselves and their family members onto the beneficiary list. Historically, targeting – and, more specifically, how these processes have been captured – have reinforced inequalities. During the Republic era, mujahedeen figures and other political actors, such as governors or chiefs of police, co-opted assessment processes and redirected them to their constituents. These dynamics have continued under the Taliban, albeit to a lesser degree. The resulting exclusion stoked local resentment and tensions. In some instances, targeting vulnerable groups (e.g., targeting widows instead of just giving food to everyone, via blanket distributions) has inadvertently created opportunities for abuses of power, including sexual exploitation.

Community councils or community members may assist in some aspects of aid targeting, programming selection and/or implementation and distribution but these measures are not unproblematic. Aid organisations often refer uncritically to their longstanding relationships with 'local communities,' which tends to obscure complex power dynamics. In some instances, communities are instrumentalised by aid organisations into 'community-led' approaches (ultimately designed by aid organisations). They typically have little say in the method or approach to targeting that aid workers apply; they are merely expected to cooperate in things like assessments. Consequently, community members often find the rules on who gets aid and who doesn't to be opaque and out of step with local norms (recognizing that some local norms do need to be challenged where, for example, they favour powerful interests).¹⁷

This can lead to misunderstandings and conflict. A common practice in both Afghanistan and Somalia is redistributions, whereby aid distributed to targeted individuals or families is later collected by the community leaders and distributed on the principle that everyone should have an equal share. Selecting a few families for aid is perceived to undermine the collective responsibility of the community to care for one another, and threatens to create tensions and jealousy. "The traditional system stops fights in the community over humanitarian aid and is accepted by the whole district," explained one Afghan elder in an area where redistribution was the norm.¹⁸

The French Africanist scholar, Olivier de Sardon, introduced the idea of the 'development broker', described as "social actors implanted in a local arena (in whose politics they are directly or indirectly involved) and who serve as intermediaries who drain off external resources in the form of development aid."¹⁹ Such a broker has been described as a 'humanitarian entrepreneur' in the context of Somalia,²⁰ or may be referred to as a 'gatekeeper', a category of local actor that has come to prominence again in Somalia in relation to corruption and aid diversion.²¹ These brokers or entrepreneurs may include customary or governmental authorities, UN or International NGO staff or owners of local NGOs or indeed other local actors. Yet aid workers and aid systems tend to continue to rely on these actors or be unable to assess and more constructively manage their role, despite a growing awareness of these issues. One Afghan elder summed it up as, "Wakil Guzars [local elders] are very corrupt, but most of the NGOs use these Wakil Guzars for aid distribution."²² In some instances, with the Taliban government in Afghanistan and the Houthis in Yemen, community councils or traditional actors have been co-opted by the de facto authorities, and gatekeep on their behalf.

Gatekeeping can be particularly problematic with respect to marginalised populations. IDPs are especially vulnerable, as they are dislocated and (in Somalia at least) primarily belong to structurally marginalised groups. This has created an IDP political economy, comprising a chain of actors (gatekeepers) who aim to profit from the projects and resources aimed at supporting displaced people. This chain of actors can include landowners (or those claiming rights over the land), local authorities, aid organisations and IDP camp managers.²³ In Somalia, this has resulted in a pervasive business economy around IDPs, where it is common for gatekeepers to take up to 50% of cash/voucher entitlements from an IDP.²⁴ While humanitarian actors have been known about these exploitative practices for some time they have been extremely slow to develop and implement effective mitigating measures.

4.2 Rapid Scale Up

The short-term funding cycles that characterise humanitarian aid also create and sometimes incentivise diversion. It has long been acknowledged that responding to long-term needs in chronic crises with short-term funding is highly problematic.²⁵ It keeps the focus of programming on responding to immediate needs to the neglect of addressing the underlying drivers and can prevent joined-up and more effective responses. But the boom and bust nature of humanitarian appeals in chronic conflicts creates perverse incentives.

An extreme example of this is the 2022 humanitarian appeal in Afghanistan, at the time, the largest-ever single-country appeal made by UNOCHA. Humanitarian aid increased from 2.1 billion USD to 3.9 billion USD. This required organisations to rapidly scale up programming. Most major NGOs doubled or tripled the number of their staff, almost overnight. New staff were typically not trained or supported to deal with pressures from authorities and communities, and did not know what to do when the usual dilemmas around diversion arose. Donors and the government alike pressured NGOs to expand their reach into 'newly accessible' areas (those that had received little aid under the Republic because of insecurity, but which were now safe to access). Establishing programming in new areas or communities can take the better part of a year. Organisations need that time to train staff, properly assess need, establish trust, and ensure activities are running as planned. In large humanitarian scale ups, they are asked to do this in a matter of weeks or months. As one aid worker in Afghanistan said,

The need is enormous and everyone is saying 'take the money', so it's not easy to say no but how can you double your staff, add new districts, and ensure program quality?...we measure our success in dollar amounts but rarely in terms of what is most impactful.²⁶

While humanitarian needs in Afghanistan have not changed, funding is now drying up, meaning organisations are contracting just as quickly as they expanded. In some instances, this had led to a loss of trust from communities and anger towards NGOs for withdrawing. As is often the case, the root causes of the crisis remain profound and humanitarian actors are left picking up the pieces.

In Somalia, humanitarian scale-ups have manifested slightly differently. There have been several major rapid scale-ups in the last 12 years, first in response to the 2011 famine, then to the 2015-16 risk of famine, and again most recently, in response to the risk of famine in 2022.²⁷ Many of the issues found in Afghanistan are evident in a review of the current humanitarian response in Somalia.²⁸ The 2011 and 2022 responses have both been associated with corruption and aid diversion issues. However, the 'scandals' associated with these scale-ups only serve to make visible what are entrenched practices. It is the lack of systemic attention to corruption and aid diversion risks in between elevated crises that is the real problem – it should not be a surprise when it emerges.

Rapid scale-ups inevitably attract predatory individuals and groups. They also raise the same questions about the capacity of the system to deliver effectively and ethically at such scale in complex, insecure environments. More modest, but more strategic and impactful expansion might well be more desirable. Yet the fragmented, competitive funding environment mitigates against this, with incentives directed toward getting more funds rather than delivering smarter programming. Scale ups ideally would be accompanied by a common set of minimum requirements regarding aid diversion awareness and mitigation.

4.3 Subcontracting and 'Partnerships'

Subcontracting donor-funded projects has become the norm in volatile operating environments, particularly (but not only) for UN agencies. Donor funding may trickle through multiple, onion-like layers of contracts, with only a fraction left for implementation. The current approach to subcontracting is deeply problematic. Risks are passed down the implementation and contracting chain. This leaves local subcontractors carrying the risks they do not necessarily have the systems in place to handle. It can also inadvertently increase the overall risks of diversion.²⁹ It also tends to deprive implementers of the flexibility to adapt to local challenges and decision-making power that could enable them to better combat diversion and corruption.

Current approaches to subcontracting tend to create perverse incentives to deliver at all costs, driving a 'don't ask, don't tell' rationale.³⁰ While the UN gets the lion's share of humanitarian aid directly from donors, most UN agencies do not deliver programming. Instead, they act as pass-throughs to implementers (NGOs or contractors). This means that they have little incentive to stop the flow of funding when problems arise. Their implementing partners bear much of the pressure to deliver projects or funds and can be easily replaced if they fail to deliver. This hits local NGOs particularly hard, as they tend to rely on project funding and lack the kind of core funding that would help them sustain operations if they were forced to suspend programming over diversion concerns.³¹ This also means that decisions about programming and budgets are made at the top rather than led by those on the ground, directly dealing with implementation pressures and constraints. As one Afghan NGO director said, "Our donors – the UN agencies – decide where we implement and how."

In Afghanistan, these tensions came to a crisis point with the ban on Afghan women working for aid organisations issued in late 2022 and early 2023. NGOs, national and international alike, mostly wanted to take a hard line, pausing operations until the ban was reversed. Most international and national NGOs advocated for a collective pause, and many UN agencies – who were not yet subject to the ban and controlled a significant portion of the humanitarian funding pool as front donors, who relied on NGOs to carry out this work – wanted to carry on. In the end, operations carried on, with significant exemptions for health and education. For many UN agencies, Afghanistan was their largest or second-largest country program, with programme funding significantly contributing to global headquarters costs (in the case of one agency, reportedly as much as 17%). One national NGO director referred to Afghanistan as “a cash cow for the UN,” reflecting a widely held sentiment.³² These dynamics reduce incentives for cooperation, contribute to mistrust and resentment, and make system-level coordination even more fraught.

One of the repercussions of being at the bottom of the sub-contracting chain is the lack of overhead funding.³³ In the case of Somalia, some local NGOs have been forced to, for example, ask staff to work for no or reduced pay and borrow from local businesspeople (whom they then may be obliged to favour in later contracts).³⁴ Overhead costs for international organisations, UN or NGOs, include a proportion for headquarters costs, which in turn supports capacity building and acts as a corporate financial buffer in difficult times, a luxury not available to local NGOs. This (combined with ‘corporate growth’ mentalities of some UN agencies) creates incentives to keep the money flowing and hide problems.

Subcontracting also opens up opportunities for new forms collusion and corruption. In Kenya and Somalia, for instance, this has created a kind of shell game whereby brokers and insiders are able to navigate competitive contracting processes. As one director of a large private company reported,

One of the brokers I use regularly is Kenyan who works for the procurement department of one of the main UN agencies... The network is big and runs deep into the agencies. It is true that you normally don't expect to win a contract without paying.³⁵

Localisation, the drive to strengthen local organisations' capacity and resources to respond to crises and promote long-term sustainability, aims to counteract some of these negative trends. The 2016 World Humanitarian Summit formally committed to provide greater support to this layer of civil society/implementation, articulated as the Grand Bargain. By the end of the 2025 financial year, USAID has committed to provide at least a quarter of all program funds directly to local partners.

Yet progress on localisation has lagged sorely behind the promises and rhetoric.³⁶ The localisation rhetoric has also been co-opted. Some UN and international NGOs have claimed to be supporting localisation but are, in reality, simply subcontracting (thereby enabling them to keep control of key resources and funds and block systemic change). Afghanistan offers a stark example of localisation in reverse, as the proportion of direct funding to implementers has declined over time.³⁷ Due to sanctions, cuts to development aid, donor risk aversion and other issues, Afghan NGOs have all but lost whatever advances in capacity or decision-making they had under the Republic. Without direct donor funding or the global or core funds that many international organisations have, national NGO survival depends on project funding. Banking restrictions and the sudden severing of development funds after August 2021, upon which many relied, had devastating consequences.

Reliance on short-term humanitarian project funding also perpetuates a vicious cycle of limited capacity. With little money and staff time to spare, they tend not to invest money or time in training or coordination. And because they feel they can be easily replaced as subcontractors, they may feel they have little leverage to push back on diversionary demands.

4.4 Armed Protection

Armed protection escorts can unwittingly create opportunities for aid diversion manipulation. In theory, humanitarian agencies only use armed escorts as a last resort.³⁸ In practice, their use is standard practice across a number of contexts – so much so that global and localised protection rackets have sprung up around their use. Widely used by the UN in Afghanistan under the Republic (but less so by NGOs), the Taliban government has required the UN to continue using them. In some instances, armed escorts have engaged in protection racketeering, enabling the authorities to manipulate and forcibly subvert aid assessments and distributions. In one instance, armed escorts acting on behalf of the provincial governor coerced a UN agency into conducting an assessment of one district instead of another, thereby potentially depriving the population in the originally selected district of aid. Similar patterns have also been observed in Yemen.³⁹

Moreover, the UN pays for these armed escorts, as they did under the Republic, providing income to the Taliban government. The UN, in Afghanistan but also elsewhere, also pays a 'per diem' involving significant funds to the government to provide armed escorts and armed security for their compounds. This creates an incentive for the practice to continue, despite the fact that violence against aid workers is markedly lower than under the Republic. In other contexts, armed escorts may have exaggerated threats or even staged attacks in order to extend their contracts.⁴⁰

There is a broader risk that these security actors, whether state security forces or private companies, enable diversion and corruption. Aid actors regularly contract smaller and local security providers, about which they often know very little. Time and again, these smaller companies are connected with criminal, political or armed actors.⁴¹ In fact, these links are often required for them to gain contracts, making them the norm rather than the exception. Thus, UN and NGOs contracts inadvertently empower criminal or armed groups, further fuelling war economies. This then heightens the risks to aid workers. In Sudan, some aid workers argue that the practice has exacerbated diversion, as well as increased the risk of attack on aid convoys.⁴² More widely, aid workers understand that reliance on armed protection is problematic. One survey of WFP reported that 70% of staff found the use of armed escorts either highly or somewhat problematic, for many of the reasons outlined above.⁴³

Norman argues, for the case of Mogadishu, that the Private Military Security Companies (PMSCs) whom provide protection services including armed escorts, are 'gatekeepers' for the international community operating within a political marketplace for security services with little regulation, and where there is an interest in maintaining high rates for security services, amplifying levels of risk and expanding business interests into hospitality, logistics and recreation. He further suggests that "institutional self-preservation, financial gain or personal vanity" are motives for the international community in these spaces.⁴⁴ In a recent briefing note by the same author, he points to tensions between the increasing embeddedness of security managers within humanitarian organisations with long-term consequences for increasing security budgets which he argues needs further scrutiny.⁴⁵

That suggests an inability to negotiate safe access in line with humanitarian principles at a systemic scale, and a need to revisit alternatives. This paper takes no position on whether armed escorts or protection should or should not be used. But there is a clear need to rethink how and when they are used. That requires an honest assessment of how their use may further entrench corruption and create other compound risks. With specific regard to diversion and corruption, two main problems deserve attention. First, armed guards and armoured vehicles create a nearly impenetrable layer between beneficiaries and the main grant holders, usually UN agencies. It can make it difficult for beneficiaries to complain. Secondly, it contributes to bunkerisation in ways that make it difficult for aid workers to understand what is truly happening on the ground. Finally, it tends to also go hand-in-hand with a reliance on subcontracting and third-party monitoring (TPM).⁴⁶

4.5 Third-Party Monitoring (TPMs)

As a result of the imprint of aid actors and networks in countries such as Afghanistan and Somalia along with the rise of remote programming, the privatisation and commodification of aid information has emerged in recent years. Data for baseline assessments, monitoring and mid and end of project evaluations is collected by a plethora of actors, some contracted out and some generated internally by agencies. TPMs have become prominent within this space, where a range of data collection methods and practices are used, including overt and covert approaches, qualitative and quantitative methods, and in-person and telephone-based methods (e.g., call centres run by some TPMs).

We focus on TPMs here as they have come to be seen by donors and implementers as integral to mitigating corruption and aid diversion. Some TPMs indeed play an important role in aid programme monitoring, but they can also enable corruption and diversion. For instance, the degree of local integration of a TPM field monitor may influence their likelihood to report critical issues concerning corruption, as this may later affect their future access or personal security. Additionally, where field monitors are sent to the same project sites on a repeated basis, which may lead to their independence being compromised.⁴⁷

In Somalia, difficulties associated with TPMs include the prominence of staff unfamiliar with the context or lacking appropriate skills. Assessing the integrity of staff is not well incorporated into HR processes, and collusion between implementing agency and TPM staff is common. One TPM monitor explained,

A few of the NGOs said to me that I should write a good report about them. They always frighten you when you are going to the villages. In the end it was very clear for me that the two agencies [National NGOs] had an insider in both [the UN and INGO]. They were also connected to the third-party monitor. The agencies themselves create third-party monitoring companies. I talked to a woman I know who worked with one of the NGOs and she told me that she left them because she could no longer bear watching the amount of fraud these people commit. She also warned me that they are dangerous and could get me shot.⁴⁸

A recent discussion paper, focused on Somalia, reported that,

At each link [in the contracting chain], pretty much everyone is incentivised to report positive information and to not report or deny negative information.⁴⁹

Linked to this, interview fatigue and instrumentalist attitudes towards research tend to undermine TPM effectiveness. "Beneficiary" responses" often reflect a calculus of attracting more external assistance, which distorts the information given, regardless of who collects it."⁵⁰ 'Coaching' of respondents/beneficiaries is another practice, where project staff, wary of any negative reporting, coach local populations to give positive feedback in advance of monitoring visits or processes.⁵¹

There is a general tendency or culture of reporting success alongside an aversion to reporting problems, including corruption, within the aid sector, which typically undermines TPMs (and other forms of monitoring and research). The pressure to do this arguably emanates from the Western headquarters of aid donors and agencies as much as from the in-country implementers. Generally speaking, reports of corruption often encounter pushback and those reporting risk negative consequences.⁵²

The TPM sector now consists of a significant number of international and national organisations. Some are considered innovative and staffed by extremely able people with a great deal of experience in navigating a complex information environment such as Somalia or Afghanistan, and with the personal and organisational integrity to bring out sensitive findings to the client, including corrupt practices. However, the underlying drivers to minimise problems and keep operations going are considerable. To the authors' knowledge, there is little quality assurance, consolidated learning or best practice within the TPM sector.⁵³ Part of the issue is that few TPMs make the information they gather public. This limits the understanding of corruption and diversion risks and the means to create a culture of greater transparency and accountability.

Third-party monitoring is less widespread in Afghanistan than Somalia, but still exists, much as a holdover from the highly insecure period under the Republic when aid agencies could not directly access some programme sites. Similar dynamics exist to those found in Somalia. A 2023 study of humanitarian principles found numerous instances where third-party monitors often knew full well the extent of concessions to local powerholders.⁵⁴ In one instance, an aid worker recounted how authorities chose 2000 out of the 5200 beneficiaries designated for assistance. Third-party monitors were told by multiple people what had happened and some monitors had witnessed instances of the interference themselves, but these were not reported. Aid workers involved assumed one of two things: third-party monitors did not report the challenges, or – if they did – the primary contracting agency simply ignored these reports. In another, aid workers were beaten by government officials when they refused to comply with their demands, and monitors were too afraid to report the incident. They feared for their physical safety, but also that the UN agencies who hired them would cut their contract if they reported it.

The same trends and dynamics have been found across other contexts. In Syria, one study found the same underlying incentives to report success and described TPM approaches as “tick box.”⁵⁵ In Yemen, the ability of TPMs to operate is dependent on their relationships with authorities, creating clear opportunities of coercion and bias, and inherently compromising the objectivity of the work they do.⁵⁶ In Houthi areas, people fear phones are tapped which inhibits people from using complaints mechanisms. Some TPMs are located in Jordan and simply do not know the local context. Monitors are also often inexperienced, and the same formulaic approach and focus on data output (rather than quality and integrity) was evident.

TPMs, initially seen as a complementary monitoring practice only employed as a 'last resort' in the most volatile conditions, are now an embedded practice in crises and conflicts.⁵⁷ Previous recommendations have suggested that the practice of TPMs needs to be regularly reassessed, and options for internalising monitoring (by implementing agencies) should be regularly re-evaluated.⁵⁸ The extent to which this is happening is not clear, especially given the entrenched nature of TPMs. In some countries, the TPM industry nets around a billion dollars annually, which provides a clear incentive to keep the practice going.⁵⁹

5. Barriers to Transparency and Corrective Action

Few aid workers will be surprised by the negative unintended effects and problematic practices outlined above. There have been numerous studies conducted, both publicly and privately, which document the pervasive nature of these dynamics.⁶⁰ There are nevertheless formidable barriers to speaking out – and most importantly – addressing these issues. One aspect is a pervasive fear that talking frankly about the problems will lead to or be used to justify aid cuts. This fear extends from agency headquarters to local populations – ‘beneficiaries’ themselves. Many feel caught between trying to do the right thing and the fear of bringing harm or depriving the Afghans or Somalis they are trying to help. Counterterrorism restrictions in Somalia, Afghanistan and beyond have further complicated aid worker calculations, and discouraged transparency. Still, other aid workers believe that some degree of corruption and diversion is the cost of doing business.

Meanwhile, many media outlets sensationalise the aid diversion, playing to domestic constituencies who do not understand why their governments give any aid to these places anyway. Often referred to by aid workers and donors as ‘the fear of the Daily Mail article,’ this can be used as a justification for hiding or suppressing conversations about and reports of diversion. Part of the problem lies in the gap between, on the one hand, how aid is portrayed and the overly ambitious claims as to what it can achieve, and the real-world complexities and compromises entailed in aid delivery, on the other. This is compounded by the seeming inability of aid actors to acknowledge the very real limits of aid in places like Afghanistan and Somalia. In a competitive global funding environment, ‘famine narratives’ and other similar rhetorical aid worker tactics tend to magnify the impact of aid and downplay risks and the coping mechanisms of local population themselves, which include help from their own private sector and diaspora populations.

Taken together, this has created a profoundly self-serving logic, justifying aid corruption beyond any reasonable level and with far-reaching harmful consequences for those aid workers claim to help. If aid organisations and donors were more transparent and forthcoming about the limits of what aid can achieve and the compromises required, there might be less fear of public scrutiny and accountability and thereby more learning and improvements.⁶¹

This, however, would require a change in the current incentive structure within the aid sector, where transparency is often punished, and concealment is often – perhaps unintentionally – rewarded with career advancement, continued funding, and further aid contracts.⁶² This leaves no safe space in which to have a practical discussion about these issues, and disincentivises any action that might rock the boat.

Humanitarian actors argue that the humanitarian imperative – the right to receive assistance when needed, and the right to provide it – may force them to compromise certain principles or bend certain rules to ensure those in need receive aid and protection. Adhering to the humanitarian imperative, however, demands that aid workers distinguish between what is immediately lifesaving and what is not. In practice, however, humanitarian actors are often reluctant to do this. Core principles and frameworks are falling short, as aid workers seem reticent to admit when they cannot deliver ethically. Volume delivered and corporate growth take precedence over quality and ethics, reflecting a profoundly short-termist outlook. The fact that humanitarian aid is often seen as a bandaid for political and military failures hardly helps matters. Many of the practices discussed above (e.g., subcontracting, TPMs, third party monitoring) were created as last resort options, deeply flawed but initiated as temporary coping mechanisms to enable aid delivery to those in desperate need. They were never meant to become normal approaches. It is perhaps not surprising then that their normalisation has created such dysfunctional outcomes and perverse incentive structures.⁶³

As one recent study of Afghanistan found, looking at aid actor responses to the ban on female Afghan aid workers, there was little evidence of humanitarian actors looking at program criticality at all when faced with tough ethical or operational decisions.⁶⁴ This has made it difficult to adhere to humanitarian and other ethical imperatives but also to make decisions about what can or should be paused or withdrawn. Part of this has to do with the consequences of making such tough choices. In some instances, interagency competition may interfere with clear assessments, and in others, suspending programming may have knock-on funding impacts (e.g., decreasing the amount of funding for overhead or global headquarters costs). In the aftermath of the Taliban ban on female aid workers, debates within the Humanitarian Country Team about programme criticality quickly turned into a competition to prove each agency's importance and relevance. Some aid workers argued that even activities like soap distribution and radio programs were lifesaving and could not even be temporarily paused.⁶⁵

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At the organisational level, there are apparent monetary and operational implications to acknowledging the limits of aid; to admit you cannot deliver without doing some degree of harm is likely to result in a loss of funding. But study after study has demonstrated that being able to stop and reassess the ethics of one's approach increases the legitimacy, safety and bargaining power of aid actors.⁶⁶ Perhaps unsurprisingly, donors and aid organisations that focus on how things are done, rather than how much money can be secured and how much can be done with it, tend to be better off in this regard. The principle of humanity is the overriding rationale for carrying on in difficult operating environments, where aid workers can do little to change the root causes of suffering or alter the constraints on alleviating it. But critical reflection on what it means to operate in this way is dangerously absent.

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