



CONFLICT
MANAGEMENT
CONSULTING

Final Report – 6 November 2018

Real Time Evaluation of IOM's Response to the Rohingya Crisis

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Acronyms

AAP	Accountability to Affected Populations
CfW	Cash-for-Work
CiC	Camp-in-charge
CoM	Chief of Mission
CMC	Conflict Management Consulting
CSO	Civil Society Organization
CT	Counter-trafficking
CwC	Communicating with Communities
DEC	Disasters and Emergencies Committee (UK)
DPHE	Department of Public Health and Engineering
DRC	Danish Refugee Council
DRR	Disaster Risk Reduction
DTM	Displacement Tracking Matrix
FCM	Feedback and Complaints Mechanism(s)
FD	Foreign Donation
FDMN	Forcibly Displaced Myanmar Nationals
FGD	Focus Group Discussion
GBV	Gender Based Violence
GoB	Government of Bangladesh
GoM	Government of Myanmar
HCTT	Humanitarian Country Task Team
HoSO	Head of Sub-Office (Cox's Bazar)
HRP	Humanitarian Response Plan
INGO	International Non-Governmental Organization
IOM	International Organisation for Migration
ISCG	Inter- Sectoral Coordination Group
JRP	Joint Response Plan
KII	Key Informant Interview
MoWCA	Ministry of Women and Children Affairs
NFI	Non-Food Items
NGO	Non-Governmental Organization
NPM	Needs and Population Monitoring (local version of IOM's Displacement Tracking Matrix)
NTF	National Task Force
OCHA	Office for the Coordination of Humanitarian Affairs
OHCHR	Office of the United Nations High Commissioner for Human Rights
PSEA	Protection of Sexual Abuse and Exploitation
RTE	Real Time Evaluation
RRRC	Office of the Refugee Relief and Repatriation Commission
SEG	Senior Executive Group
SCI	Save the Children International
SEG	Senior Executive Group
ToR	Terms of Reference
UMN	Undocumented Myanmar Nationals
UN	United Nations
UNFPA	United Nations Population Fund
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Fund
WASH	Water, Sanitation and Hygiene
WFP	World Food Programme
WHO	World Health Organisation

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I. Summary

L3 Rohingya Response Summary

Within a few months after end of August 2017, some 670,000 Rohingya were forced to flee from Rakhine State to Cox's Bazar district. They arrived with few possessions, in poor physical and mental state, in an environment where sites with full infrastructure had to be carved out for forested hills in the Ukhia and Teknaf subdistricts. The response was equally massive, with the number of organisations and agencies involved increasing from some 15 to 135 over the following six months.

IOM has been one of the major contributors to that success. Present for many years, it massively scaled up, taking on four major responsibilities: a) Its own programmatic work, directly and with implementing partners, in site development, shelter & NFI, health, WASH, protection, Communicating with Communities (CwC) and site management, while also maintaining and expanding its local version of Displacement Tracking Matrix (DTM); b) sector lead or co-lead for site development and site management, shelter & NFI, and CwC; c) setting up and management a procurement and supply line for several agencies, notably for fuel and WASH products; d) leadership then co-leadership for the overall response, a situation it had never been in before. This is a particularly remarkable challenge as this was the 7th L3 IOM responded to in 2017. Noteworthy is also the constraining policy environment by the Government of Bangladesh, that wants this to be a 'temporary situation' only.

In October 2017, IOM appealed for US \$ 119.77 million. A second appeal, in March 2018 was for US \$ 182.1 million. As of June 2018, IOM's appeal was only 22% funded. The collective Joint Response Plan found itself equally severely underfunded in the same period.

This real-time evaluation (RTE)

The Terms of Reference state the purpose of this RTE to be *“a formative, forward-looking evaluation to improve ongoing decision making and management of IOM's emergency response to the humanitarian crisis in Cox Bazar as well as at a global level. (...) The RTE will provide IOM with real-time and practical recommendations to facilitate operational improvements to strengthen the emergency response during the period covered by the 2018 Joint Response Plan (JRP) and, if already applicable, the stabilisation and development focused interventions.”* (ToR p.2) Its audience is internal.

The ToR state three focus areas:

- Focus Area 1: Retrospective: *“A review of the IOM's Cox's Bazar humanitarian response to date, including the quality and relevance of IOM's ongoing interventions.”*
- Focus Area 2: Forward looking: *“Identification of opportunities for longer-term programming in Cox's Bazar and a review of IOM Cox's Bazar strategy to transition from what is primarily a humanitarian response to a more stable and development focused model as the situation allows.”*
- Focus Area 3: *“Implementation of IOM's internal L3 procedures in supporting IOM's response at HQ, RO, and country level to identify gaps and provide recommendations for improving procedures.”*

This RTE report covers Focus Areas 1 and 2. Focus Area 3 is the subject of a separate report.

The multiple sectoral activities and responsibilities of IOM in this setting, the complexity resulting from a large number of actors, the controversy over the leadership of the overall response, and the time frame under consideration that had to be taken back to 2013 and forward to end 2021, made this a

very challenging exercise. This RTE concentrates on Needs and Population Assessment, Protection, CwC/Accountability to Affected Populations (AAP), and coordination, and possible medium-term scenarios and attention points. References to site management are included inasmuch as they relate to the above topics. This RTE does not review IOM's huge contributions in site development and the delivery of basic services, such as shelter, NFIs, health and WASH. As per the intent of the ToR, the RTE gives more attention to the broader strategic level, and less to IOM's own response programming.

Field work in Dhaka and Cox's Bazar took place between 30 June and 12 July 2018 and was carried out by a two-person team, made up of Mr K. Van Brabant and Ms S. Patel. Even with a narrowed focus, this proved a very short time to cover much ground. By and large the report refers to the situation in July 2018 but, in successive drafts, more recent documentation has also been incorporated, and some developments.

The report draws on a variety of sources: interviews and group conversations with many colleagues from IOM and other agencies, as well as Rohingya and some individuals associated with the host community. The RTE team had a chance to conduct observations in Camp 1, Camp 18 and Camp 20 extension. That qualitative information is only partially complemented by the low number of responses to two out of the three surveys. On the other hand, the report draws on a broad range of IOM and non-IOM documents, including several that summarise relevant surveys.

Key conclusions and recommendations

a. Overall appreciation

The scale and speed of the refugee influx was overwhelming. The physical and mental condition they were in was poor. The sites where they eventually were located were forested hills without any existing infrastructure. That major morbidity and mortality were avoided is a huge, collective success. IOM has been one of the pillars and major contributors to this success, thanks to its presence on the ground, its good relations with the GoB, its establishment of an interagency coordination structure in the spring of 2017 and its ability to scale up rapidly. IOM is also very well placed to be a major actor in the transition to stabilisation, recovery and development-oriented programming.

The actions reviewed here (NPM, protection, CwC/AAP and coordination) are all highly relevant. NPM overall has provided great value in a data-scarce environment, with broad coverage, regular updates and maps that contribute to coordination effectiveness. IOM has a significant protection component in this response and may be leading in Gender-Based Violence. But the collective protection services are not, currently, able to meet the needs, in terms of coverage and effectiveness. This is partially a result of the surprising failure of service sectors to integrate some basic protection measures from the outset. CwC/AAP faces serious resource and contextual challenges, that have impacted on its effectiveness. Overall, there is a *major participation deficit*, that keeps the refugees disempowered beyond the restrictions imposed by the GoB.

While data are routinely gathered with sex and age disaggregation and with attention to vulnerability, this does not automatically lead to programming that addresses gender roles, admittedly not easy with a Rohingya population that for decades has been under stress. Overall, the affected populations, be they refugees or host communities, are also assumed to be fairly homogeneous social groups, an assumption that must be tested in further programming with and for both.

The strategic challenges for the overall Rohingya response are:

- Evolve from a life-saving and supply-oriented response to a people-centred one with substantive participation of the affected populations;
- Improve the interagency coordination to produce more cost-effective and integrated outcomes;
- Protect the refugees from forced repatriation;

- Evolve from emergency relief to transition, recovery and developmental programming that stimulates economic development in Cox's Bazar district, to the benefit of those residing there.

b. Needs and Population Monitoring (NPM)

A critical contribution to the collective response: The NPM regular site assessments have been the single most important source of comprehensive, and updated, information for the collective response. It can be complemented by other surveys and research data but none have the same coverage and are regularly updated. If NPM had not been there when a mega-response took shape, IOM or another agency would have had to set it up. That would have taken significant time and come at higher cost, compared to the actual expansion and adaptation of the already existing NPM to new circumstances. The maps are another crucial contribution to the collective response, also enabling more geographical coordination.

Separation between data gathering and data interpretation: While the division of roles between data gatherer (NPM) and data analyst and interpreter (sectors) is understandable, it also creates a potentially problematic disconnect. Data gathered (NPM products) are more widely available and easily accessible, than the analysis and interpretation, which can give rise to misinterpretation and misuse of data, by the very many who do not participate in the sector- or working group discussions. NPM sees itself as a service provider. As such, they can disagree with certain requests / questions that their 'clients' would like them to pursue in their research, but they do not feel authorised to challenge/correct their 'clients' on problems with the data they get from other sources, or on interpretational errors of NPM data. Here the division of labour between a qualified research entity and those who analyse and interpret creates room for error. The introduction now of more mixed methods may reduce this risk.

Beyond majhis: NPM acknowledges the limitations and possible biases of heavy reliance on male majhees. Women and children should have been deliberately included several months ago, as systematic source of information, particularly as IOM's own 'women's participation survey' of Jan. 2018 found evidence that women's needs were not being heard or answered. Several agencies had set up children, women and girl-friendly spaces in several sites months ago, and some Rohingya women have also been recruited by aid agencies. Concerns about how informed and 'representative' certain Rohingya women would be as KI, could have been tested without too much effort. Greater diversity of KI is now being introduced as of Round 12.

No comprehensive treatment of 'access': Different sectors propose access related questions for each NPM round but are not systematic or comprehensive in the factors they inquire about. This leads to variable treatment of the multiple factors that determine 'access'. That creates a risk of misinterpretation, notably an impression that people have more access than they do, e.g. when access is just considered as no more than 30 minutes' walk to a service point.

Information management problems in the collective response: The collective information management is said by IOM colleagues to have been negatively affected by the high turnover of Information Officers in different key agencies, and the apparent institutional reluctance of some, notably UNHCR, to share data.

Recommendations regarding Needs and Population Monitoring

R1: NPM: Urgently achieve the evolution to a mixed method and a more inclusive approach to key informants, ensuring that women and children are heard directly and consistently.

R2: NPM: Be systematic in conveying the methodological base and caveats of the report, and upfront explicit about who the KI are.

R3: NPM: Be proactive on the ‘access’ issue, rather than let sectors pick and choose some factors that determine access or not.

R4: CO, SEG: If obstacles to interagency data sharing persist, take the issue to the highest level (SEG, Agency HQ, donors), as a matter affecting the coordination abilities of the overall response.

c. Protection

Protection needs remain unmet: The refugees have many legal but also physical protection needs that remain unmet in the collective response. This is partially the result of lack of agencies with protection expertise, insufficient experienced staff among the agencies present, and insufficient funding. Partially however this also results from an unjustifiable lack of integration of protection from the outset and in basic services sectors, in contradiction with established good practice and guidance.

Law and order: To maintain the civilian character of the response, the aid community has encouraged a greater role for the Bangladesh police rather than the army. Attention remains required to the evolving sense of security of the refugees, who at times have expressed a higher degree of confidence in the army than the police.

Prevention: Relevant and competent efforts continue to be made to provide case management support to survivors of Gender Based Violence (GBV). IOM’s GBV work is setting the standard and has also provided training to others. But as a significant proportion of GBV happens in the camps and therefore seems to occur among refugees, prevention requires more active mobilisation of community leadership and community-based protection practices.

Information sharing: The sharing of protection data between agencies runs into similar problems as with population data. This needs to get resolved.

More organisational support: Not in the least because of the alarming levels of GBV and trafficking, the protection work can benefit from more attention and support from Dhaka and HQ for this response. The RTE found that IOM has at times been slow in deploying enough experienced people to fill key protection positions. Support is also needed in terms of wider advocacy and the pursuit of better funding. IOM protection colleagues in Cox’s Bazar regularly organise donor visits with a focus on protection and counter-trafficking and provide briefings. IOM is not seen, by other actors, as an agency with significant protection expertise. This response creates an opportunity to influence that perception. On the other hand, IOM institutionally is not set up for lobby/advocacy work, which has a different purpose and conveys issues differently than the Communications Department does.

Recommendations related to Protection

R1: HQ, CO: Highlight more, to donors and the GoB, the continuation of unmet protection needs, advocating for more funding and acceptance of more protection specialists.

R2: HQ: Deploy additional staff with solid protection, PSEA and CT experience to support the awareness raising and training of IOM staff, partners where needed and other agencies.

R3: Cox's Bazar emergency response: Ensure that protection (and AAP) are more strongly integrated in site management and technical sectors from the outset, formally via terms of references for sectors and working groups and their coordinators, and in practice via briefings to new recruits and ongoing monitoring of staff behaviours and operational outcomes.

R4: HQ: Integrate protection into the L3 procedures and expand the institutional capacity to rapidly deploy very experienced protection staff to multiple complex crises simultaneously, over time establishing IOM as an active player in protection.

d. Communicating with Communities/Accountability to Affected Population

Challenging conditions and appropriate initial priority: IOM has given appropriate attention to engaging the affected populations, e.g. via outreach workers, a participation survey, FGDs. The CwC WG, which it coordinates, is a valuable component of the overall response. Collaborating agencies like Translators without Borders, BBC Media Action and Internews, and more recently Fondation Hirondelle, are adding value through their efforts to reduce the translation challenges and initiate participatory community radio. IOM appropriately co-funds some of these, though delays in administrative and financial processing have at times reduced their efficiency. An initial emphasis on messaging to the affected populations, and its continuation for the monsoon and cyclone season, were appropriate. Throughout the first year of the crisis response, repeated efforts have been made to consult with refugees, assess their evolving information needs, and their use of Feedback and Complaints Mechanisms (FCMs). The operational challenges are significant however, and include language barriers, funding shortages, staff attitudes and Rohingya preferences for personal communication, particularly on more sensitive issues.

Confusion about the relationship of CwC, AAP and substantive participation: There can be excellent communication without accountability, and accountability without substantive participation in important decisions. There is conceptual but also institutional confusion over this -as noticeable e.g. in job descriptions- which needs to be clarified. There are also different understandings of whether IOM's practices for participation and accountability are limited to aid-programming issues over which IOM has direct control only, also take on those that concern the aid-programming of other agencies, and extend to issues of concern to a population that are not aid-related? As supporter of the CHS and the Grand Bargain, as a UN agency defending various human rights Charters and Conventions and, in this context, also as co-leader for the overall response, IOM's ambition and objective must be substantive participation and accountability, with a readiness to hear and respond to all issues raised. "CwC", with its connotations of 'communication', does not adequately express that ambition and obligation.

AAP not yet sufficiently mainstreamed: Notwithstanding many good initiatives, including within IOM programming, AAP, like protection, so far has not been fully mainstreamed into the different service delivery sectors of the overall response. There is a significant participation deficit in the overall response, even if some agencies do well in their circumscribed projects. This is the case in

relationship to service provision but even more striking with regard to broader concerns of notably the refugees. The absence of genuine participation of refugees in the current discussions about the reform of their governance is unacceptable. Contributing factors to this can be the multitude of sectors and working groups in the coordination set-up, the possible belief that this is not life-saving and hence not a priority, and the lack of self-awareness about the power than humanitarian actors wield. CwC, as a working group, also has no formal leverage over sectors.

Delayed shift from a needs-based to a rights-based and people-centred approach: Overall, the collective response still has to make the shift from a needs-based to a rights-based and people-centered approach. CwC, or rather ‘AAP’ understood as aiming for participation beyond FCMs, has a central role to play in this, within IOM and within the response as a whole. This is more than a technical-programmatic issue. It also requires a change in mindsets: The prolonged portrayal of a population as needy, vulnerable and even traumatised, and hence with reduced ‘agency’, de facto diminishing their ability to influence decisions over choices and actions supposed to be for their benefit. Many reports signal that the Rohingya now demand a greater say in what is being decided for them.

Recommendations on AAP-CwC

R1: IOM HQ/CO/RO: Clarify institutionally the practical understandings of CwC, AAP and participation, with the goal being substantive participation and accountability. The right of refugees (and affected populations) to have a say in matters that directly affect them, beyond basic services, is to be explicitly acknowledged. So too the responsibility to pass on issues that may not be within IOM’s remit, to those concerned.

R2: Rohingya response: Accelerate, within IOM programming, through the -renamed- AAP WG and the SEG, the AAP and participation objectives in the Rohingya response: e.g. through the fielding of additional experienced AAP staff with community mobilisation experience that can engage with the different affected populations; systematic inclusion of Rohingya from the outset in decision-processes that will affect them; more open listening without preset agenda; more extensive collaboration with Rohingya-based organisations such as the Centre for Social Integrity and interaction with other emerging Rohingya community organisations; collective advocacy to donors to better fund approaches to turn a needs-based into a more people-centred response, through IOM’s sectoral coordination roles and role as co-leadership position in the SEG.

R3: CwC WG: Change the heading to ‘AAP-participation WG’ and bring in (as per the WG ToR,) a local co-chair for the WG, to strengthen the engagement with the host community.

e. Coordination

A tolerant perspective: Those with a tolerant view of coordination challenges will see the ups and downs of the coordination story in the past year with leniency: “Any coordination system in the world takes time to develop and mature; key actors and stakeholders need to mature with it.”¹ An appreciate perspective will also underscore that the coordination today is better than it was three months ago, when it was already better than six months ago.

A critical perspective: Others on the other hand, especially NGOs but also donors, remain critical of what was widely perceived as excessive competition, especially among UN agencies. As one INGO aid worker, with extensive comparative experience put it: “the Rohingya crisis response has been one

¹ Interview with senior UN official.

of the most competitive environments I have ever seen”.² There is particular sensitivity about the perceived absence of accountability because of the leadership controversy. As one UN official put it to a donor representative: “where there is no clear leadership, there cannot be accountability!”.³ The argument can be made that the ultimate responsibility, and accountability is a collective one, of the Resident Coordinator and the two Co-chairs of UNHCR and IOM. Collective responsibility is acceptable, when it is indeed acknowledged and acted upon.

Form over function: The point must be made that the conversations around coordination seem to turn far more around ‘models’, ‘lead agency’, and ‘reputational risk’ than about its practical purposes: this should be to meet people’s needs, protect their fundamental rights, strengthen their capacities and resilience, as fast, comprehensively, equitable and cost-effectively as possible. Structures of ‘coordination’ do not automatically generate ‘collaborative’ attitudes. More focus is needed on behaviours around problem-solving, than formalistic models. An ICVA NGO support mission in July 2018 called for an inclusive process to design a coordination structure that will “ensure a principled, accountable and effective response now and in the future.”⁴

Coordination competencies: Leading the coordination of a sector, working group or totality of activities in a particular site, with a diversity of agencies and personalities, over which one has no formal authority, requires solid technical or thematic expertise, but also many soft skills. The quality of sector- and working group coordinators in the overall response has been variable, including among those deployed by IOM.

Recommendations regarding coordination

R1: CO, SEG: The coordination review: Continue to influence the main coordination review exercise to ensure that it is inclusive, and results in more (time and cost) efficient, effective and accountable inter-agency coordination, that links shorter-term relief with medium-term transition and recovery perspectives, and actively draws on input from the different affected populations. Effectiveness at outcome level is more important than models and agency leadership.

R2: HQ: Coordinator competencies: Ensure that IOM-deployed sector and working group coordinators have the experience and personal and professional competencies to foster collaborative practices among diverse actors with different views.

f. The medium-term

Medium-term planning is urgently needed but politically sensitive: The probability that most Rohingya refugees will return to Myanmar in the foreseeable future is extremely low. Medium-term planning is urgently needed, not in the least to determine where further infrastructural investments have to be made before the 2019 monsoon season, but officially not accepted by the GoB.

Key scenario determinants: Key determinant factors identified, that- in various combinations- will shape the medium-term scenario are: decongestion or not, particularly of the mega-camp; levels of aid funding sustained or declining; significant economic investment in Cox’s Bazar district or not. The announcement by the World Bank and the Asian Development Bank of significant development funds for the district, creates an opportunity to pursue the least bad scenario of decongestion with inclusive

² INGO senior staff member interviewed in February 2018.

³ Interview with donor representative in February 2018, but the point was reiterated by a senior UN official to the RTE team during an interview in the summer of 2018.

⁴ ICVA NGO Support Mission July 2018: Key recommendations: 2.

economic development. Towards donors, some of which have already lined up 3-year funding, this can be argued in terms of the humanitarian-development nexus.

More substantive engagement with host community needed: Notwithstanding significant negative environmental and economic impacts on the poorer sections of the host community, empathy for the Myanmar refugees remains fairly high. However, the host community currently does not get the information about the projects the aid community is already implementing for their benefit, and their ability to participate in what have to be tripartite discussions also with the local authorities, is too limited. CSOs, local to Cox’s Bazar rather than from other parts of Bangladesh, are well placed to be strategic players and allies in this regard.

Localisation as strategic objective: Localisation (and a participation revolution) is one of the Grand Bargain commitments IOM has endorsed. Whereas in practice, this tends to become an objective when the funding for international organisations declines, a more effective paradigm is to consider ‘reinforcing’ local capacities (also from at risk and affected populations) a strategic objective. To that effect, generalising prejudices about local CSOs need to be kept in check. Creative thinking about socio-economic development must be mobilised as fragmented projects rarely have a multiplier or cumulative impact effect.

Rohingya community development: The improved security of the Rohingya refugees creates an opportunity for this community to develop itself. This has equal value for successful repatriation as successful prolonged stay or integration in Bangladesh. This is currently not happening in a deliberate manner.

Recommendations on the Medium-Term Strategy
<p>R1: CO, SEG: Use informal channels of communication with GoB officials to discuss the approaching investment dilemma, the implications of likely decline in relief aid and the opportunities created by the promised development funding.</p>
<p>R2: CO, RO, HQ TRD: Start shaping IOM’s transition, recovery and development strategy, with active attention to projects and investments with economic multiplier effect, not just basic service delivery and disaster risk mitigation projects. Include the reinforcement of local capacities to the point where they can take over as a strategic objective.</p>
<p>R3: Cox’s Bazar emergency programme, sub-office, CO: Encourage the maturing of Rohingya community-based organisation, and open up space for their substantive participation, together with but also beyond ‘elected committees’.</p>
<p>R4: HQ, CO and Cox’s Bazar sub-office: The Transition and Recovery Unit in Cox’s Bazar, currently a bit in the shadow of the emergency response, needs to evolve to an equal level component, in terms of seniority and calibre of staff, and strategic and operational management attention. It needs to have the capacity to broaden and deepen the relational network with local authorities in the district, but also with Cox’s Bazar local CSOs and other influential social, economic and political actors in the district. These will be important channels for two-way communication, and citizen participation.</p>

II. The Setting

Cox's Bazar District: The operational environment for the current 'Rohingya' refugee response is Cox's Bazar District in the southeast tip of Bangladesh, notably the two sub-districts (upazila) of Ukhia and Teknaf, touching the border with Myanmar. The district is one of the poorer ones in Bangladesh, with significant income and food insecurity. It is vulnerable to cyclones and was hit three times by one in recent years, the last one Cyclone Mora in May 2017.

Rohingya refugees: The 'Rohingya'⁵ are the largest group of Muslims in Myanmar, overwhelmingly concentrated in Rakhine State across the border from Bangladesh. Successive military regimes in Myanmar have questioned their legitimacy, portraying them as illegal 'Bengali' immigrants and a threat to the 'Buddhist' nation.⁶ Structural discrimination and denial of citizenship, combined with violence, have sent successive waves of Rohingya to seek refuge in Bangladesh. The first came in 1978. A second major influx took place in 1991-1992, many - though not all - of which returned to Myanmar through an assisted repatriation process between 1994-1997. Renewed violence in Rakhine State in 2012 and 2016 again forced tens of thousands to flee to Cox's Bazar district, while an estimated 100,000 ended up in closed IDP camps in central Rakhine. By the spring of 2017, some 33,000 registered 'Undocumented Myanmar Nationals' (UMN) found themselves in two official camps there, jointly administered by the Government of Bangladesh (GoB) and UNHCR. However, there were another estimated 210-303,000 unregistered ones, living in make-shift settlements and/or mixed in with the host populations in Cox's Bazar town, or Ukhia and Teknaf districts. The Rohingya are the largest stateless population in the world.⁷

The latest 'Rohingya crisis' resulted from targeted and violent persecution in Rakhine State in what the OHCHR has called a "*textbook case of ethnic cleansing*".⁸ Within a few months following August 2017, it forced some 600,000 additional Rohingya to flee to Bangladesh, arriving there without many possessions and in poor physical and mental shape.

GoB policy: Bangladesh is not a signatory to the Refugee Convention. Over the years, the successive governments have largely been unwilling to grant 'Undocumented Myanmar Nationals' (UMN) or 'Forcibly Displaced Myanmar Nationals' (FDMN) formal refugee status, risking becoming seen as the duty-bearer for their rights that other countries in the world have denied them. Not until 2013 did the GoB establish a National Task Force (NTF) on 'Undocumented Myanmar Nationals and Refugees'. Chaired by the Ministry of Foreign Affairs, it brings together more than 22 Ministries and governmental authorities. Until then, it had severely restricted access for international relief agencies beyond the two registered camps. The NTF asked IOM to be the lead coordinating agency.

The crisis resulting from the large-scale influx in the last months of 2017, poses significant economic, political and security concerns for the Bangladesh Government. Though the GoB in September 2017 called for international assistance which led to a second major influx, this time of national, regional and international aid agencies, it has retained very tight control on particularly non-governmental organisations, via registration, visa for internationals and the requirement of a Foreign Donations type 7 (FD7) approval for short-term projects only. Its official policy is that the Forcibly Displaced

⁵ The name 'Rohingya' remains contested. The GoM refers to them as 'Bengali', the GoB as 'Undocumented Myanmar Nationals' or 'Forcibly Displaced Myanmar Nationals'. The population wishes to be identified as 'Rohingya'. Noting these political caveats, that name will be used in this report. However, some of the refugees are Hindus, who do not identify as 'Rohingya'. There may be small numbers of other social identity groups among them.

⁶ Wade, F. 2017 Myanmar's Enemy Within. London, Zed Books.

⁷ UNHCR 2017: This is our Home. Stateless Minorities and their Search for Citizenship.

⁸ UN High Commissioner for Human Rights to the UN Human Rights Council on 11 September 2017.

Myanmar Nationals (FDMN) will repatriate, and that their stay can only be temporary. Accordingly, the humanitarian assistance could not provide more permanent shelter, formal education, income-generating opportunities beyond casual labour, or use cash-programming. The refugees are also largely contained in the two sub-districts with tight movement control.

IOM in Myanmar and Cox's Bazar: Both Myanmar and Bangladesh are member states of IOM. IOM has programmes in both countries and is involved with Rohingya on both sides of the border. In Myanmar, IOM has been a major player in putting internal and external migration on the Government of Myanmar's (GoM) agenda, opening the conversation on how irregular migration can be turned into safe migration, and how migration can become more of an economic opportunity. IOM did not come to Rakhine State because of the orchestrated/communal violence of 2012. It works on issues important to all communities: Disaster Risk Reduction (DRR) and disaster response, irregular migration, community stabilisation etc. This is relevant as -perhaps- one day it will also be involved in supporting voluntary repatriation. How it is perceived by the GoM and Rakhine nationalists will then be important.

In Bangladesh, there is a strong and longstanding relationship with IOM based on Bangladesh's large diaspora, migrant workers and irregular migration. The expertise on irregular migration in both countries is important also for the Rohingya question. Rohingya used to irregularly migrate from Rakhine state, and at times became victims of trafficking. It can be expected that several will also try to irregularly migrate now from Cox's Bazar.

IOM has had projects in Cox's Bazar district since the early 2000's and opened a Sub-office there in 2014. Having been given the coordination leadership position in 2013 by the GoB, it used this role to create new space for other UN agencies and INGOs willing to work there. IOM itself provided services in various sectors, such as health, shelter/NFIs, WASH and protection from gender-based violence. For those purposes it had a small Sub-Office in the town.

Following criticism over how it handled the coordination at the time of a new influx of 87,000 FDMN in late 2016-early 2017, IOM reviewed the coordination structure in the spring of 2017. The result was the creation of the original Inter-Sectoral Coordination Group (ISCG), with a newly appointed IOM coordinator, taking up her position in July 2017. Overall, this addressed the concerns of other agencies. It needs to be noted that these developments took place also when Cyclone Mora hit the district. IOM started its NPM service at that time, with a first survey carried out in March 2017. In other words, the ISCG and the NPM predate the August 2017 crisis.

The 'Rohingya crisis' as of late August 2017: The scale and speed with which some 670,000 additional forcibly displaced people poured across the border into Bangladesh was overwhelming, all the more so because there was no suitable land available to 'settle' the new refugees and organise the provision of services. As of 14 September, the GoB made available a certain amount of hilly and forested land. The amount of 'earth moving' required for physical site development has been exceptional. Virtually all basic infrastructure (roads, drainage systems, culverts, electricity, phone coverage, and all basic services) also had to be created for now some 900,000 FDMN, some 600,000 of which are densely concentrated in the mega-camp of Kutupalong-Balukhali. While prior to this crisis there had been some 15 agencies (UN, INGOs, national/local NGOs) working in the area, by March 2018 that number has expanded to some 135-140, creating a no less overwhelming coordination challenge.

IOM response: IOM continued operating, directly (60%) and with implementers (40%) in site development, shelter, NFIs, health, WASH, site management, protection, and CwC, while scaling up massively. It also sustained its Needs and Population Monitoring (NPM, the report of Round 11 was published in July 2018). As part of the fund raising, IOM issued two Appeals of its own: one for the period September 2017-February 2018 for a total of US \$ 119.77 million, and a second one for the period March-December 2018 for a total of US \$ 182.1 million. Annex 7 provides a summary of the financial allocations per sector or theme of work as of 2 July 2018.

The first IOM appeal (Oct. 2017) positively mentioned the intent to set up “site governance structures, inclusive of both Rohingyas and host communities to assess needs, analyse conflicts, and jointly identify solutions.” Host communities are also mentioned, briefly, under CwC in terms of conflict reduction between them and Rohingya. This resonates with the Humanitarian Response Plan at the time, that IOM contributed to, and which contains more explicit references to the host community, at least in its crisis overview.

The second IOM appeal (March 2018) on the other hand explicitly envisages benefits for the host community via Quick Impact Projects and equitable access for both host and refugee populations to relevant services and protection. Host community benefits are also planned for under site management, alternative fuel provision, livelihoods, shelter-related cash-for-work etc.

Scaling up has also meant a large increase in staff numbers, as indicated by the following table. Relevant from an evaluative perspective, but not shown by these numbers, are the duration of assignments and the levels of turnover (and its cost or impact), the qualifications of staff for the task, and the quality of interaction and atmosphere among staff. As elaborated in the companion ‘L3’ report, this has impacts on overall cost-effectiveness, internal and external relationships, and interagency coordination efforts.

Description	National		International			Total
	IOM Staff	3rd Party	International Staff	TDY/STA/Secondment	Consultant	
Before August 2017	55		4	1	0	61
June 2018	269	669	56	30	25	1,049

Throughout this crisis response, IOM continued or assumed multiple responsibilities:

- Managing own programmatic interventions (directly or with and through other agencies);
- Sector co-lead (with Caritas) for Shelter & NFI and co-lead (with the Danish Refugee Council) of the Site Development & Site Management sectors. It also leads the CwC working group;
- Procurement and supply services for a number of agencies, notably for fuel and WASH;
- Unprecedented, IOM found itself in the coordination leadership role of one of the largest refugee crises in the world, with international media attention. A key feature of this response, so far, has been the public challenge to that leadership role, notably from UNHCR.

Relevant to the overall appreciation is that the Rohingya crisis was the seventh L3 that IOM responded to in 2017.

III. This Real Time Evaluation

3.1 Purpose, Focus Areas and Time Horizon

Purpose: Real-time evaluations (RTE) are utilisation-oriented exercises and provide an opportunity for learning-in-action and for adaptive management. They are conducted more rapidly and flexibly than end-of-action or ‘ex-post’ evaluations, and therefore will rely more on qualitative than quantitative approaches.⁹ Typically they are also interactive and participatory, feeding into a process of joint reflection and learning.¹⁰

The Terms of Reference for the Rohingya RTE state the purpose as “*a formative, forward-looking evaluation to improve ongoing decision making and management of IOM’s emergency response to the humanitarian crisis in Cox Bazar as well as at a global level.*” The forward-looking intent is subsequently emphasised: “*The RTE will provide IOM with real-time and practical recommendations to facilitate operational improvements to strengthen the emergency response during the period covered by the 2018 Joint Response Plan (JRP) and, if already applicable, the stabilisation and development focused interventions.*” (p.2)

Focus areas: The ToR specify three focus areas:

Focus Area 1: Retrospective: “*A review of the IOM’s Cox’s Bazar humanitarian response to date, including the quality and relevance of IOM’s ongoing interventions.*”

Focus Area 2: Forward looking: “*Identification of opportunities for longer-term programming in Cox’s Bazar and a review of IOM Cox’s Bazar strategy to transition from what is primarily a humanitarian response to a more stable and development focused model as the situation allows.*”

Focus Area 3: “*Implementation of IOM’s internal L3 procedures in supporting IOM’s response at HQ, RO, and country level to identify gaps and provide recommendations for improving procedures.*”

This RTE report covers Focus Areas 1 and 2. Focus Area 3 is the subject of a separate report. The audience for both reports is IOM internal – though donors interviewed have asked to be at least informed about major findings and recommendations.

The scale of the overall operation, the number of sectors/working groups IOM is actively involved in, the different roles it exercises, and the number of actors and key stakeholders in the situation, as well as the volume of documentation, make it impossible to review everything within a limited time.¹¹ As per the Inception Report, this RTE does not focus on the more ‘technical’, service delivery areas (health, WASH, shelter etc.), in which IOM has been a major player and contributor to the overall response. Instead, as per the Inception Report, it decided to focus on what are often more challenging aspects for an emergency response: protection, AAP/CwC interagency coordination; and income-generation, livelihoods and the relationships refugees-host communities. It also looks at the Needs and Population Monitoring component of IOM’s work, which is an important service to the collective

⁹ See e.g. Polastro, R. 2014: Evaluation Humanitarian Action in Real Time: Recent practices, challenges and innovations. Canadian Journal of Program Evaluation 29(1) 118-134.

¹⁰ For more detail on its purpose, and how it differs from regular monitoring and end-of-action evaluation, see Cosgrave, J. B. Ramalingam & T. Beck 2009: Real Time Evaluations of Humanitarian Action. Pilot version. London, ALNAP pp. 10-14

¹¹ The 2-person team conducting the 2014 RTE of IOM’s response in South Sudan spent 22-person days in country to review the implementation of the IOM L3 procedures and IOM’s performance as coordinator of two clusters. This RTE 2-person team had a combined total of 15-person days in Cox’s Bazar district and of 23 days in Bangladesh as a whole, in which to cover NPM, protection, CwC-AAP, and coordination, looking back to 2013 and forward to 2020-2021 and consult with refugees.

response. Overall, the RTE leans towards the strategic level and not the IOM specific projects and programmes, as per the intent of the ToR.

Time horizon: The ToR envisaged the period under review to be 25 August 2017 - 28 February 2018. In practice, the time horizon of this RTE goes from mid-2013 to end 2021.¹² This implied consulting also some documentation of the pre-L3 period, and scenario-thinking for the medium-term.

3.2 Methodological Challenges, Achievements and Constraints

Qualitative: The RTE team had qualitative conversations with several IOM colleagues in HQ, the CO, RO and emergency response in Cox's Bazar. It also had conversations with three donor representatives, two humanitarian advisors to the UN, UNICEF, UNHCR and WHO colleagues, several INGO people, the representatives of the Cox's Bazar CSO and NGO Forum (local Bangladeshi CSOs), a Rohingya-based CSO, four group conversations with Rohingya refugees, interviews with a few recently relocated Rohingya individuals or families, and a group meeting with local Bangladeshi actors in Ukhia upazila. While interesting, this does not cover the 'host population'. It regrets not having the time to meet with government officials or national IOM staff.

Surveys: The ToR envisaged one short survey of no more than 10 questions. There being many topics, and many potential interlocutors, three thematically focused surveys were prepared.

- **Survey 1:** *IOM L3 procedures and practice through the Rohingya response* (internal to IOM; 15 invitations - 7 responses). In retrospect, this should have been circulated more widely.
- **Survey 2:** *Coordination effectiveness in the Rohingya response* (60 invitations, to a full list of coordinators, focal points etc. from diverse agencies etc. - 11 responses);
- **Survey 3:** *Income and livelihoods support in Cox's Bazar*: This survey was supposed to be sent out by the coordinator of the Livelihoods sector¹³ to the active members of that sector-group but was not.
- The RTE team coded and triangulated interview data among each other, and with survey responses - considering their non-statistical validity. Interviews and group conversations were conducted under confidentiality rules, to encourage people to speak frankly. Some survey comments are also frank. To maintain the focus on the issues and not on personalities (or imagined sources of statements), these notes are kept confidential. Footnotes indicate the type of interlocutor.

Documentation: The RTE draws on various IOM or sector documents but also relevant documents and reports from the ISCG and other agencies. These are referenced in footnotes. Some of these are survey-based, but may have similar methodological weaknesses as the two surveys for this RTE. Through another mandate, it was also able to see 12 proposals for different types of projects in response to the Rohingya crisis, from 7 Swiss NGOs. All of these include situational assessments and refer to ISCG and NPM reports. They are one example of how ISCG and NPM reports are used.

Observation: IOM programming, past and present, takes place in many sites in Ukhia and Teknaf Upazilas. In theory, a selection of these must be visited, to observe first-hand the actual services and approaches. Time constraints made this impossible. The RTE team spent time in Camps 1, 18 and

¹² As the field work took place in late June and the first half of July 2018, the actual crisis response period under consideration was adjusted accordingly. Exchanges around the inception report confirmed that the history prior to the August 2017 crisis is relevant. Because the TOR also invite reflections related to a 'longer-term' stabilisation and recovery period, this RTE intentionally tries to look ahead beyond the current Joint Response Plan (originally until the end of December 2018, now extended to end of March 2019).

¹³ In February 2018, there was an attempt to initiate a working group on 'host populations', which did not activate due to differences about its scope of work. The topic then got subsumed under the 'Livelihoods' group.

Camp 20 extension. The choices for Camp 1 and 18 resulted from the locations where Rohingya were convened to speak with it but did include an older and established site (Camp 1) and a new one (Camp 18). Camp 20 extensions was chosen deliberately to get a proper appreciation of what it takes to establish a basic ‘settlement’ in a new location. With more time, Camps 19 and 20 would have been visited, as well as sites in Teknaf Upazila, where IOM has been working for many years, which would have given a better comparative perspective.

Balancing multiple inquiries: The RTE team therefore had to balance the allocation of its limited time in Bangladesh between attention to the retrospective (focus area 1) and the prospective (focus area 2) orientations; between attention to IOM’s own response programming and its leadership role for the overall response; between institutional and operational issues; and between the views of IOM colleagues and those of other actors and stakeholders. There are inevitable trade-offs between scope and depth and rigour of inquiry.

The efficiency question: Following the refugee crisis, IOM has multiplied its staff in Cox’s Bazar by at least a factor of 10¹⁴. What the overall increase figures do not show is the intensity of staff turnover, and delays related to internal functioning, two factors that can affect the efficiency of the response, both intra- and interagency. A ‘Management Review’ of the Rohingya response took place shortly before the RTE field work. Not having any insight about its finding, the RTE team cannot comment whether it may answer some of the efficiency questions. The cost-efficiency question however is highly relevant. Globally, the 2016 Report on Humanitarian Financing, a major reference for the World Humanitarian Summit a few months later, signalled an increasing gap between needs and finance. In Bangladesh, the local Bangladeshi CSOs by February 2018 were already warning that a lot of money was being spent on expensive internationals turning over rapidly, eating into the available funds while a drop in international funding for the crisis is to be anticipated.

Comparing notes of different reviews: The RTE team has consulted the public report of the RTE of the UK DEC response. It has interviewed the team leader of the more longitudinal RTE commissioned by UNHCR and received verbal insights into the draft review of protection in the response. It did not get any information on emerging findings of the CwC aspect of the response, or UNICEF’s RTE. Some see the separate UN agency RTE’s as (another) manifestation of the UN to work as one. The particularities of the Rohingya refugee situation, with its physical concentration and fragmentation among a multitude of agencies, certainly merits a ‘whole-of-response’ approach to RTEs. The other RTEs are planned to be in the public domain. Donors interviewed for this RTE have expressed a desire to see at least its major findings and recommendations.

¹⁴ The table on p. 11 indicates a pre-August crisis staffing of 61. The minutes of the L3 review meeting on 7 July, on the other hand record a figure of 190.

IV. Focus Area 1: Looking Back at Selected Programme Themes

4.1 Needs and Population Monitoring

a. Description

NPM is the Cox's Bazar version of what IOM globally calls the Displacement Tracking Matrix (DTM): Its central products are the regular 'site assessments'. Interestingly, the first such 'round' was undertaken in March 2017, following the influx of new refugees in late 2016. Four rounds were completed before the mega-influx after end August 2017. Currently the 12th round is nearing completion. Core information in these reports are the updates on population movements, and on the evolving needs of communities, i.e. the population at different sites. NPM currently has some 80 enumerators, all Bangladeshi. A good proportion of these are women, who also make up about 40% of the team leaders. The stated core methods are KII, FGD and observation. Before publishing, care is taken that no information remains included, that would allow the identification of individual KIIs.

The NPM unit of IOM conducted or conducts various other activities. A comprehensive overview was produced in September 2018. Among them are:

- Daily assessment (collation and mapping) of Category 1 incidents
- Provision of the GIS support to transition from a 'zone' to 'camp/site' system, in support of Site Management and the RRRC (December 2017-January 2018)
- Technical support to the mapping of 'paras' (groups of houses, typically in more mixed sites with refugees and host population in close proximity), undertaken by various site management partners – in Teknaf Upazila (April-May 2018)
- Preliminary assessment of land ownership types in areas with heavy refugee concentration
- Mapping of camp boundaries, majhee blocks and sub-blocks and the production of ad hoc maps responding to user demand. Helpful for this has been the use of 3D drone imagery (quicker to obtain than satellite imagery). The first drone flight took place in September 2017.

NPM's information, but also original data, can be accessed via a comprehensive portal.¹⁵ UNHCR on the other hand does not provide detailed, only aggregated, data, and does not share the original data. This is a point of friction.

In addition to its own work, NPM has been providing various types of technical support to other agencies such as REACH and Ground Truth Solutions, supported sectors like Site Management and Shelter/NFIs, and the Site Maintenance Engineering Project (SMEP). NPM staff also participate in various working groups.

b. Observations and Reflections

High relevance for aid agencies: For every round, sectors are invited to review the questionnaire for the issues of interest and concern to them. A balance is struck between maintaining some longitudinal coherence and remaining utilisation-oriented by addressing current questions. We also see NPM information used in e.g. INGO project proposals. The maps are in demand and used in the reports and communications of many agencies, other than IOM.

Accuracy of maps: The production of workable maps has required significant effort. Prior to the arrival of the refugees, these were mostly forested hills of which no reliable maps existed or were accessible. There was therefore no basis to work from. The drone images allowed the appreciation of the relief – very important in this setting. Extensive work-on-foot was carried out to map the boundaries of majhee blocks and of sites/camps – and update or correct these over time.

¹⁵ <http://iom.maps.arcgis.com/apps/MapSeries/index.html?appid=1eec7ad29df742938b6470d77c26575a>.

Notwithstanding, in early February, an experienced international aid worker walked a large site, to appreciate where health and nutrition services might be too far away from certain blocks, to be accessible. The person then informed the relevant sector, who had to correct its ‘mapping’ of services and increase its budget for additional service points. NPM colleagues explained that the mapping of service infrastructure is the primary responsibility of the sectors and not of NPM. At times the sectors or those mandated to do so for a sector failed to deliver. This has reportedly been the case with REACH, which was supposed to inventorise the WASH infrastructure in the latter months of 2017 but failed to do this comprehensively and ran into challenges keeping the information updated. ISCG eventually took the lead on this, working with the sectors and asking REACH and NPM for technical support. At times, NPM has informally stepped up to verify and if needed correct, service point mapping. Reportedly, maintaining an up-to-date map of service points remains a major challenge. The RTE team sees a relation here with the delay in complementing sectoral with geographical coordination, and a coordination structure with minimal Government presence, that lacked the formal authority to oblige aid providers to provide regularly updated information about their services.

Methodological questions: A few non-IOM actors interviewed, including a donor representative, expressed some reservations about the methodological underpinnings of the NPM data over time. These concerned:

- The discrepancy between 2017 refugee figures assessed in the first NPM rounds, and those mentioned before NPM started. By end 2017, aid agencies figures for pre-August refugees in Bangladesh turn around the 200-230,000 number. Prior to that, the smaller number of agencies present, including IOM, had been seeking funding from donors with a figure more in the order of 300,000 plus.¹⁶ That figure still appears in the Round 5 report and IOM’s first appeal.¹⁷
- Variable coverage of sites, making successive figures not necessarily comparable. When NPM started, prior to the mega-influx, it took a while to expand its coverage: Round 1 for example identified and assessed 44 sites. In round 2, an additional 18 sites were identified i.e. a total of 62 sites. Round 3 assessed 53 sites, and Round 4 57 sites.¹⁸ Quite surprisingly, the block (100 households) locations reportedly are also quite fluid, merging and splitting often.
- The reliance on majhees as central ‘key informants. This is questioned on two grounds: First, their power position as central interface between the refugees and the aid providers (and the known abuse of that power by several, recognised since a long time¹⁹) raises concerns about deliberate misinformation; second: they are almost exclusively men, who cannot be assumed to be accurate voices of regarding the needs and access of children and women – even less so in a highly conservative society. IOM’s own research on ‘women’s participation in camp life’ (Jan. 2018) had found “*evidence of women’s needs being unheard or unanswered.*”²⁰ The issue of power dynamics bias, though not of possible age and gender bias- is recognised in the fuller methodology note of February 2018. Acknowledgments that “*a level of bias should be*

¹⁶ This point was made by a donor representative as an irritation point about having been misled about actual numbers, till perhaps the spring of 2017. The RTE cannot do the historical inquiry into this issue. The 300.000 figure, according to NPM reports (e.g. Round 4 page 1) apparently derives from the GoB National Strategy on UMN, which dates from 2013. The question then would be where they got that figure from, particularly since the large majority of UMN is not registered. A proper historical inquiry would have to find out whether the GoB imposed restrictions on the surveying/estimating/counting of the unregistered UMN.

¹⁷ 21 September 2017, page 2.

¹⁸ Round 4 report of July 2017, pp. 1-2 Footnote 2 on page 3 signals that the assessed population does not account for all Rohingya and that subsequent assessments will seek to expand coverage. It does not explain why there are less sites in this round than in Round 2.

¹⁹ E.g. Draft minutes of an Emergency Coordination Meeting of 23 March 2017.

²⁰ IOM May 2018: Preliminary Report-Bangladesh. Women’s participation project. p. 9

*taken into account*²¹ are appreciated, but after many rounds NPM could have made a solid appreciation of the possible bias.²² NPM provides a pragmatic explanation for the heavy reliance till now on majhis: They constituted the only existing structure, that could also be used to get relatively accurate information, rapidly and repeatedly. The belated outreach to UNICEF and UNFPA to help identify good female KI, is also attributed to the heavy NPM workload during the first months of the response, that could not absorb qualitative interviews on top of the quantitative surveys. This is partially acceptable but note needs to be taken that, for comparable exercises in mixed sites, where host populations and refugees live in close proximity, multiple KI were routinely used. Positively, as of Round 12, NPM is moving to a mixed method approach. This will include systematic interviews with all site management focal points; systematic interviews with female KI by female staff and enumerators using open-ended questionnaires (identified thanks to cooperation with UNICEF and UNFPA); and systematic interviews with any existing governance system such as the aforementioned mixed sites with their ‘para-development committees’.

- Language precision:
 - *Estimates and accurate figures:* While it may be clear to the NPM colleagues that the data are collected through a form of rapid assessment and provide estimates, the use of very precise figures may give readers the impression that the data are underpinned by a detailed household or head count. In the Round 4 report, for example, population estimates are given for the makeshift settlements of Kutupalong, Balukhali and Leda, but the figures for households and individuals are then very precise, e.g. 3,705 HH and 20,016 individuals for Balukhali. Such precise figures cannot be derived from a combination of KII, FDGs and observation.²³ The RTE team found no indications however, to suggest that the NPM figures might be off the mark and agrees with IOM staff that ‘estimates’ are not necessarily an indicator of a flawed methodology.
 - *Focus group discussion:* RTE inquiry revealed that when majhees are interviewed, typically a number of other people come and listen in. The enumerators take the opportunity to check issues also with others present. This is sensible, but such ‘ad hoc’ group is not a ‘focus group’: focus groups have an intentionally chosen composition. This is made explicit in the methodology page of e.g. the Round 10 report (“spontaneous community group”). Moreover, given the power dynamics around majhees, the possibility cannot be ruled out that the ‘spontaneous listeners’ are in fact those who support him because of his patronage.
- ‘Access’:* Access can refer to physical but also to financial barriers to use of a service, and to security, social and cultural ones. RTE conversations clarified that ‘access’ in NPM terms mostly refers to physical access i.e. the time to walk to a service point, the cut-off point being ‘more than 30 minutes. Financial barriers in principle should not exist as services should be free. There is much anecdotal acknowledgement to security being a restrictor of access, even to toilets, especially at night and for women. This is recognised in NPM research questions

²¹ May 2018 Site assessment Round 10 report, p. 13.

²² A perception, mentioned by one donor representative, that (at times) the Rounds would rely to quite a degree on phone calls with majhis, rather than face-to-face conversations and physical presence in their areas. According to NPM colleagues, this never happened, as can be ascertained by the Geopoints of the Kobo devices used by the enumerators, which show they were physically on location. The only possible explanation can be a confusion with phone conversations held for a Joint Needs Assessment, which is a different NPM activity carried out for the ISCG only if a large-scale disaster event hits. The methodology for such an exercise relies on phone-calls to site managers focal points since access to the sites might be hampered.

²³ The fact that UNHCR-support household surveys generate figures that correspond very closely to NPM one does not invalidate the point made. A fairly accurate estimate remains still an ‘estimate’.

related to protection²⁴ but dissociated from the physical access data.²⁵ Furthermore, we don't know whether refugees are hampered by social or cultural barriers – a not unreasonable question given the restrictions on movement in public of adolescent girls and women in this conservative society. Interestingly, when it comes to 'access to education', NPM reports identify a diversity of factors, presumably because the education sector inserted such questions.²⁶ NPM recognises that other agencies, through their programming, may have better insight into this. The lack of precision about the limited reference of 'access' in NPM reports, may give an inaccurate picture that hides serious problems. The mixed method approach being introduced now, and particularly greater gender diversity among KI, should address this point – as could user access and satisfaction surveys for certain sectoral services. IOM did carry out a User Satisfaction Survey in June 2017; repeat exercises of this type are recommended.

In the two focus group discussions with Rohingya women, the participants described the same problems regarding access to health: long waiting times with occasionally being told to come back the next day; communication problems with the medical personnel; and prescription of some general medicine ('paracetamol') without real diagnosis. Not having looked at the health sector work of IOM or others in IOM co-managed camps, the RTE cannot comment on this. WHO interlocutors did confirm that more supervision and monitoring of the quality of health care in clinics is needed.

"Safety/security": NPM reports collect refugee perception's views on safety and security in the various locations. With high frequency children and women report safety and security incidents around latrines and bathing facilities, whereas men are more at-risk during firewood collection. Lack of lighting at latrines and bathing facilities is also often referred to. Unfortunately, no distinction is made between what tends to be called a 'safety' incident, such as stumbling into a latrine pit in the dark, and a 'security' incident, which would refer to harassment or assault by another person.

- *Methodological caveats*: NPM colleagues correctly point out that experienced researchers will pay attention to the methodological caveats in any document, but most ordinary users will not. This it cannot fully control. The RTE team observes however a shift in the location and detail of the methodological caveats over time. In the report of Round 4 (July 2017), a 'methodology' note appears at the bottom of page 1 and the top of page 2. In the report of Round 5 (September 2017), methodological observations about estimates and extrapolations appear on page 2, prior to data-filled graphs. A fuller methodological note appears on the end page, which also has a paragraph about the 'key informant network'. At the time a diversity of key informants is being used (the majhi system was not yet in place). Though mention is made of "UMN representative" as one category of KI, there is no detail who in practice this refers to. The reports of e.g. Site Assessments in Round 8 (Jan. 2018) and Round 10 (May 2018) contain one summary paragraph in the beginning. More recent Site Assessment reports tend to have a one pager on NPM at the end, but these no longer specify that the KI are mainly majhees. An extensive methodological note was published in February 2018 as separate document. This later appears as an annex to the Site Profiles of e.g. Round 9 (March 2018), Round 10 (May 2018) and Round 11 (July 2018) but not of Round 12 (September/October 2018). In it, majhees are not entirely accurately described as "*a community leader, belonging to the Rohingya refugee population*", though it subsequently says they were appointed by the army, not elected/selected by their community and that there is concern about the power they have. There is also a separate note from May 2018 on the Category 1 Incident Methodology.

²⁴ E.g. Round 8 report p. 9 and Round 10 report p. 11.

²⁵ Which in the reports of Round 8 and Round 10 can be found e.g. in the sections under Water, Sanitation and Hygiene for latrines and bathing facilities.

²⁶ See e.g. the reports of Round 8 page 10 and of Round 10 pp. 12-13.

- **Interpretation of data:** Data do not speak for themselves. Identifying e.g. a lack of bathing facilities in a certain site is relevant but doesn't explain why that is the case several months into a response. A decline in services or access to them, over two or more rounds, would also beg the question 'why'? From an NPM point of view, it is not their task to provide analysis and interpretation, that is the role of the sectors, who also see it as their prerogative. Occasionally, some broader contextual information and insight is pulled together in short reviews by the ACAPS-NPM Analysis Hub.²⁷ While this is understandable, the net result is that the basic data and successive assessment reports are widely available, and also used by policy and decision-makers remote from Cox's Bazar, while the analysis and interpretation by the sectors is not or not as easily accessible. This is a broader inter-agency problem, that does concern IOM as a co-lead for the overall response. Where IOM is a sector lead, e.g. in site development and site management, it is in a position to make the complementary analysis and interpretation of certain data equally available.

Wider data sharing and information management: Several problems were flagged up by NPM colleagues:

- Lack of interagency data and/or methodology sharing: UNHCR is collecting data but only provides aggregated ones, without detail. A data sharing agreement has been under discussion for several months now. The hope is to finalise it by the end of 2018. Other agencies have also conducted surveys, but do not necessarily provide methodological details or fuller data. From an NPM point of view, this makes it delicate to introduce such results into their reports, as NPM would help to publicise something under its name, the reliability of which it has not been able to assess;
- According to NPM colleagues, the issue of data sharing and collation has been part of the discussions of the Information Management groups since November 2017. These discussions continue to go back to 'start' with the constant turnover of Information Officers within different agencies – and because of the lack of consistent institutional positioning on this. The 'Information Management Working Group' continues to operate. An extension of it is the 'Needs Assessment Working Group' which will be conducting joint analysis, primarily for the JRP revision, by consulting the primary data providers, among them IOM NPM, WFP and UNHCR/REACH.

c. *Conclusions*

A critical contribution to the collective response: The NPM regular site assessments have been the single most important source of comprehensive, and updated, information for the collective response. It can be complemented by other surveys and research data but none have the same coverage and are regularly updated. If NPM had not been there when a mega-response took shape, IOM or another agency would have had to set it up. That would have taken significant time and come at higher cost, compared to the actual expansion and adaptation of the already existing NPM to new circumstances. The maps are another crucial contribution to the collective response. Having fairly reliable (and also periodically updated) maps, makes coordinated action much easier.

Problematic segregation between data collection and data interpretation: While the division of roles between data gatherer (NPM) and data analyst and interpreter (sectors) is understandable, it also creates a potentially problematic disconnect. Data gathered (NPM products) are more widely available and easily accessible, than the analysis and interpretation, which can give rise to misinterpretation and misuse of data, by the very many who do not participate in the sector- or working group discussions. The self-image of NPM colleagues is one of a service provider. As such, they can disagree with

²⁷ E.g. on 'Rohingya Influx since 1978'; 'Diphtheria', 'Host Communities Review', 'Rohingya governance and community', 'Cyclone Lessons Learned'.

certain requests / questions that their ‘clients’ would like them to pursue in their research, but they do not feel authorised to challenge/correct their ‘clients’ on problems with the data they get from other sources, or on interpretational errors of NPM data. Here the division of labour between a qualified research entity and those who analyse and interpret creates room for error.

Beyond majhis: NPM acknowledges the limitations and possible biases of such reliance on male majhees. Its methodology can easily be adapted to other governance set-ups e.g. an elected committee. From the RTE’s point of view however, women should have been deliberately included several months ago, as systematic source of information. Women and girl-friendly spaces have been set up in several sites months ago, and some Rohingya women have also been recruited by aid agencies. Where there would have been questions about their quality as key informant, this could have been tested without too much effort.

No comprehensive treatment of ‘access’: Segregating different factors that determine ‘access’, creates a significant risk of misinterpretation, notably an impression that people have more access than they actually do. It reproduces a problematic separation of protection from other services sectors such as WASH.

Information management problems in the collective response: The collective information management appears to have been negatively affected by the high turnover of Information Officers in different key agencies, and the apparent institutional reluctance of some, notably UNHCR, to share data.

Recommendations regarding Needs and Population Monitoring

R1: NPM: Urgently achieve the evolution to a mixed method and a more inclusive approach to key informants, ensuring that women and children are heard directly and consistently.

R2: NPM: Be systematic in conveying the methodological base and caveats of the report, and upfront explicit about who the KI are.

R3: NPM: Be proactive on the ‘access’ issue, rather than let sectors pick and choose some factors that determine access or not.

R4: CO, SEG: If obstacles to interagency data sharing persist, take the issue to the highest level (SEG. Agency HQ, donors), as a matter affecting the coordination abilities of the overall response.

4.2 Protection

a. Description

The protection concept: The concept of protection for the overall response evolved over time. The HRP (October 2017:25-26) refers to child protection and protection from Gender Based Violence (GBV, more in terms of referral and care of survivors than prevention), mental wellbeing, attention to people with specific needs and vulnerabilities, and peaceful coexistence with host communities. It identifies the need for camp security, provided by civilian (i.e. not the Bangladesh army) institutions. It sees timely registration and profiling of refugees as critical, “to include all family members and capture vulnerability and socio-economic indicators.” The JRP²⁸ reiterates these threats, but now also mentions the “absence of identity documentation and recognised legal status”. The JRP also picks up the issue of intra-community cohesion (p. 54), “insufficient community-based approaches” and “how important social and cultural norms of the community impact self-protection mechanisms.” (p. 55)

Local capacities: This is not an area of experience or expertise of Bangladeshi NGOs, even less so in refugee contexts.

IOM protection work: In line also with its IASC engagement, IOM is committed to protection being a central aspect of its humanitarian response. Protection in humanitarian response means safe, good and principled programme. The programme in Cox’s Bazar is one of its largest protection operations globally, integrating a rights-based approach into the operations. It provides direct services in Gender-Based Violence (GBV), child protection, civilian protection and counter-trafficking (CT).

The overall objective of the programme is to improve the living conditions and psycho-social wellbeing of vulnerable women, men, girls and boys among Rohingya and host communities. The GBV programme seeks to prevent gender-based violence and to enhance the access to a quality response of survivors. The CT pillar seeks to enhance the awareness of trafficking risks, capacitates local and national duty bearers, and ensures dedicated support and redress for victims of trafficking. The civilian protection pillar further promotes social cohesion and stronger community-based prevention and support.

The overall protection needs are and remain very high – including among the host population. Tracking and collecting statistics on protection threats, risks, and incidents is a major challenge. Those that have been collected, including by IOM, show an alarming rate of GBV. Various actors are also reporting incidents of trafficking to IOM. The refugees from Myanmar do not currently have the full spectrum of rights under the 1951 Refugee Convention. This leads, for example, to contradictions in the legal and justice sphere, where a Bangladeshi national can take a refugee to a Bangladeshi court, while an aggrieved refugee cannot do the reverse. Protection should be everyone’s responsibility. In practice, the current collective expertise and capacity to deal with protection issues is not sufficient.

IOM is one of the biggest protection actors in the Rohingya response. At the time of the RTE, it had almost 70 staff, as well as five partner agencies, with more envisaged.²⁹ It also has a non-funding partnership with DRC/IRC, who contribute to the monitoring in IOM managed sites. IOM has a solid protection policy and guidance from the Global Protection cluster, and a very good case management and follow-up system. Project staff have been actively working with national partners like PULSE, to strengthen their capacity in case management and follow-up. IOM’s protection programme also seeks to work closely together with site management.

IOM furthermore has a data protection policy, for media engagement, messaging, reporting to donors etc.

²⁸ Joint Response Plan March 2018:11/54-58

²⁹ The five received 45% of the available budget.

b. Observations and reflections

Legal aid: The legal assistance needs of Rohingya (and probably also sections of the host community) remain largely unmet. This is the result of a combination of factors: funding, expertise and capacities. IOM's current protection work has not been able to incorporate a full Information, Counselling and Legal Assistance (ICLA) service, for lack of funding. Legal assistance is provided to victims of trafficking though. The Rohingya also have a need to have births, marriages, deaths etc. officially recorded. There are not enough agencies with the required expertise.³⁰ There remains ambiguity about the remit (and capacities) of the Bangladesh judicial system to support cases from Myanmar refugees. UNHCR has been a strong advocate on the issue.³¹ As this is fundamentally an issue with and for the GoB, it needs to be taken up at Dhaka level.

Neglect of elementary protection concerns in the initial response: Protection in the overall Rohingya response has not had the centrality envisaged in the IASC 2013 policy on 'Protection in Humanitarian Action'.³² Admitting the overwhelming and chaotic nature of the initial situation, the prevalence of toilets and bathing facilities not being gender-segregated and many not having locks, and the prolonged shortage of public lighting, are indicators of the -collective- low attention to protection in the initial response. A UNHCR Protection report already drew attention to this in October 2017.³³ Problematically, a UNHCR protection support mission in June 2018 still notes these same issues.³⁴ That situation persists, as clearly confirmed by e.g. NPM Site assessments in Round 10 (May 2018) but also Round 12 (October 2018), where refugees keep mentioning the problem of non-segregated latrines and bathing facilities, the lack of lighting in public spaces (and their houses) and mention handheld torches/solar lamps as a much needed household item. There cannot be a convincing justification for this being neglected for so long, at the collective level. The RTE did not inquire whether this occurred within IOM's own programming, but it does relate to its overall role as (co-) lead of the overall response. It also raises the question of whether site management, WASH and protection sectors were linking closely enough from the very outset. Conversations at the internal L3 review meeting indicate this was not the case and that the integration of protection, as of AAP, still has some way to go. Coordination systems structured around sectors and not enough around sites, create such risk of siloed approaches. The section on 'coordination' elaborates on this point.

A specific protection measure: lighting in public spaces: Public lighting is systematically mentioned in good practice references such as Site planning guidance,³⁵ the Camp Management Toolkit³⁶ and

³⁰ Norwegian Refugee Council for example, with huge ICLA expertise, was not present in Bangladesh and has run into difficulties and delays of registering.

³¹ A Bangladeshi lawyer, consultant to UNDP, told the RTE team that UNDP has already conducted research on this, and may do further work.

³² http://www.globalprotectioncluster.org/assets/files/tools_and_guidance/IASC%20Guidance%20and%20Tools/iasc-policy-on-protection-in-humanitarian-action.pdf.

³³ <https://reliefweb.int/sites/reliefweb.int/files/resources/60854.pdf> The fact that UNHCR had little capacity on the ground and was slow in scaling up does not invalidate the concern that protection does not get enough attention.

³⁴ UNHCR June 2018: Protection Support Mission, Cox's Bazar, Bangladesh. It also observes "*a reflection needs to be undertaken by the responsible technical sectors about how these fundamental omissions took place, so corrective measures can be taken*", p. 2

³⁵ Site Planning – Guidance to Reduce the risk of Gender-Based Violence, Third edition, April 2018, pp. 34, 36, 39, 49, 51.

³⁶ The camp management toolkit, 2008, [https://www.dropbox.com/s/5ewbzkqf412zos2/NRC-Camp Management Toolkit-2008-lang_EN-ref044.pdf](https://www.dropbox.com/s/5ewbzkqf412zos2/NRC-Camp%20Management%20Toolkit-2008-lang_EN-ref044.pdf), page 207, 319, 320, 369,576. The issue remains an important attention point in the subsequent 2015 edition.

Minimum Standards in Humanitarian response (2011).³⁷ It is not normally dealt with under Shelter and NFIs as in this response.³⁸ It has much wider safety, security and protection implications, and is often associated with the responsibilities of camp/site management.³⁹ Its importance was already highlighted in the UNHCR protection report in October. A note “*Guidance on lighting at communal, household and individual level*”, with attention to gender issues and protection concerns, and recommending beneficiary involvement, is not dated but appears to be from December 2017. The issue has been recognised from the outset by IOM, which in its first appeal (Sept. 2017-Febr. 2018) envisaged the installation of 7000 solar street lamps at key service points and along roads and pathways. Yet a year after the influx, public lighting in many sites is still very inadequate.⁴⁰ This is an important protection measure, that the shelter and site management sectors, both co-led by IOM, should have been more effective on. Although one IOM colleague asserts that poorly implemented lighting can contribute to increased protection risks, the question is not whether it can, in certain circumstances, be counterproductive, but whether it is in this particular environment? The RTE team heard multiple comments from international aid workers about how insecure the camps become in the evening and at night (aid workers, certainly internationals, leave the sites around 16-17 h). More importantly, refugees continue to bring up the issue.

Prevention of sexual abuse and exploitation:

- **High risk:** A highly aid dependent refugee population, a fair number of women-headed households, thousands of new staff hired rapidly by a multitude of aid agencies, a reluctance of Rohingya to raise sensitive issues via impersonal FCM, and a history of smuggling and trafficking in the area, are factors contributing to a risk of sexual abuse and exploitation also by aid workers.
- **Insufficient staffing:** IOM is co-chairing the Cox’s Bazar network on Prevention of and Protection from Sexual Exploitation and Abuse (PSEA) with UNICEF.⁴¹ Its ToR were developed in November with a PSEA coordinator hosted by IOM. In the last few months, this role is filled by the IOM GBV specialist, as the post of PSEA network coordinator has remained vacant for several months. Seeing PSEA thus integrated with protection is very positive, however it is additional work to all the other tasks.⁴² A UNHCR Protection Support Mission (June 2018) acknowledges “*the limited number with established SGBV expertise, low capacity in newly recruited staff, and high staff turnover*” as part of the collective challenge.
- **Slow planning and procedures:** Developing its Standard Operating Procedures and getting them agreed by the Heads of Sub-Offices Group took a long time. There is now also an approved strategy for 2018-2019.
- **Staff awareness:** Raising awareness of PSEA to over 1,000 staff and volunteers, with turnover of staff, is obviously challenging. Positively, IOM has ensured that PSEA training is part of the induction of new staff. Trainings were organised repeatedly as the response, and staff numbers, scaled up. The challenge is that the person doing the trainings is also managing the

³⁷ Humanitarian Charter Minimum Standards in Humanitarian response, 2011, pp. 110, 243, 256, 275, <http://www.sphereproject.org/resources/?search=1&keywords=&language=English&category=22&subcat-22=23&subcat-29=0&subcat-31=0&subcat-35=0&subcat-49=0>.

³⁸ E.g. Site Assessment Round 8:6: Site Assessment Round 10, p. 6.

³⁹ Norwegian Refugee Council 2008: Camp Management Toolkit e.g. pp. 207, 319, 320, 369,576.

⁴⁰ See e.g. the July 2018 survey by Ground Truth Solutions Bulletin No. 3 Safety and Outlook. More lighting, and segregated washing facilities remain primary recommendations.

⁴¹ CXB Network on Protection from Sexual Exploitation and Abuse Terms of Reference.

⁴² RTE Interview with GBV coordinator.

GBV work and -ad interim- co-chairing the PSEA subgroup, in the absence of a dedicated coordinator. but the collective attention of the multitude of aid agencies to PSEA seems to have been low and slow.⁴³ It has also not been a priority attention point for CwC WG.⁴⁴ : In the RTE team conversation with some host community actors in Ukhia upazila, a participant brought up the use of drugs also by aid workers, and the abuse that can result from it. IOM colleagues confirmed they had heard the same.

- Sharing the code of conduct: It is vital that parts of code of conduct is shared widely with the affected populations. They should know what kind of behavior is expected from staff, what is power abuse and sexual exploitation and abuse and how to complain if there is a breach.
- Enabling complaints: IOM is reviewing its FCM and putting in place a few core, well-trained focal points within site management structures. These do awareness raising and training and will be available to report on behalf of an individual with a PSEA concern or experience, thus reducing writing and communication barriers. This is a good initiative.
- Case management: IOM women and girl safe spaces have one case manager and 2 caseworkers in each space who are trained to receive survivors of PSEA. Another area where this model could be useful is in child friendly spaces. The RTE team understands that IOM's GBV work acknowledges cases of abuse of boys and men. Resource constraints prevent the development of more safe spaces, also for males.

Counter-trafficking: CT is integrated within the broader protection work, which is sensible. Irregular migration and counter-trafficking are important components of IOM's overall programme in Bangladesh. Cox's Bazar has a history of smuggling of drugs and weapons but also of people. There are fears that the new refugee population is easy prey for the traffickers, also in women and children, all the more because they have virtually no income opportunities and no prospects for the future. Yet, there have been three different CT officers in 7 or 8 months, and with long delays in the HR process. Given the trafficking in the district, the reported lack of experience and expertise among the local police, and the possibility that Myanmar refugees, with no status or prospect, opt for risky coping strategies, Notwithstanding an IoM-UNHCR agreement in the spring of 2018 to work jointly on CT and drug awareness raising, CT seems insufficiently resourced⁴⁵ and is not getting enough attention from the CO.

Coverage: Protection services are slowly improving and expanding in coverage, but the collective capacity (in terms of numbers but also experience and expertise of staff) is still not enough to cover all sites. The GoB of Bangladesh not seeing protection as a 'life-saving' activity, and reportedly having been reluctant to register INGOs with 'refugee' in their name, may have been one contributing factor to this.

Law and order: The UN and other international agencies, as well as donors, have been anxious to establish the civilian character of the sites, i.e. not have the Bangladesh army remain a central player and the main source of security provision. The protection staff have been promoting civil-military guidelines in the camps and worked with the army on how to engage with civilians.⁴⁶ As a matter of general policy, the Bangladesh police is supported to establish and scale up its presence to provide

⁴³ See UNHCR June 2018: Protection Support Mission, Cox's Bazar-Bangladesh p. 6.

⁴⁴ Note is taken of the message that 'aid is free', but more is needed.

⁴⁵ This relates to numbers and depth and breadth of experience of the staff, and possibly funding. The IOM CO has significant experience on CT in Bangladesh, more of which may be mobilised in support of the Cox's Bazar situation.

⁴⁶ HCCT humanitarian advisors at Dhaka level have been working with the army on civil-military relations. Given its huge experience in peacekeeping, the Bangladesh army must also have in-house expertise on this.

security. There is a general tendency, however, to underestimate the difficulties Rohingya have, based on their long experience in Myanmar, in trusting any authority, and certainly people in uniform. Regular perception surveys, by trusted field workers, will be required to see whether Rohingya have an increased sense of security, or not – and why.

Rohingya social norms and values: The high level of GBV, including in the camps, presumably by other Rohingya, suggest it is an indicator of wider erosion of social and cultural norms. From that perspective, it should be connected to the issue of Rohingya (religious and secular) leadership (see section on CwC/AAP and participation in this report). Protection work also needs to expand to further promote, support and connect community-based approaches.⁴⁷

Information sharing: UNHCR coordinates the Protection Working Group, the only one it leads at the time of the RTE. Yet UNHCR has periodically failed to provide a full-time coordinator, which has impacted on the effectiveness of the Working Group.⁴⁸ IOM participates in the Working Group.⁴⁹ As for with population data (see section on NPM), there remain inter-agency obstacles to produce comprehensive and collated protection information from all involved. IOM has signed on to the GBV Information Management System platform and is developing standard operating procedures with UNHCR on sharing victims of trafficking data sets. IOM's information system on GBV is seen as of very high standard. UNHCR had started to set up a parallel system but subsequently agreed not to go ahead with that.⁵⁰ IOM also shares 5W information on a weekly basis as well as aggregated information. UNHCR does not share data with IOM. That lack of reciprocity gives IOM colleagues the feeling that IOM is not recognised as a key player on the issue.

Effectiveness: While senior IOM protection staff show a high degree of experience, expertise and dedication, IOM colleagues acknowledge that it has been challenging to get the right staff – and adequate funding- in place rapidly. There have also been instances when IOM did not provide the promised protection service, which attracted criticism and led to challenges about 'areas of responsibility'. Additional highly experienced staff are needed, partially also to strengthen the capacities of other agencies. There has been good collaboration between protection and site management, e.g. in the 'participatory site safety audit', for which IOM also trained staff of various other agencies. There have been instances of close collaboration between site management, protection and the GBV team e.g. in the Jan. 2018 'women's participation survey'. Yet IOM protection staff interviewed affirm that coordination with site management can be strengthened more,⁵¹ and more protection staff is needed to ensure adequate coverage. Protection also needs to be more deeply integrated with other IOM programmes.⁵²

A perception problem: Protection should be everybody's responsibility, a point made clear in various IASC documents and statements, though not all agencies (can) have the necessary expertise. Donor representatives interviewed in Dhaka indicated that they see protection as a UNHCR area of expertise,

⁴⁷ The IOM protection team is reportedly adapting modules from Syria to raise awareness of men and boys around GBV. The RTE team still believes that close involvement of well-selected Rohingya is vital.

⁴⁸ Conversation with international reviewer.

⁴⁹ INGO staff interviewed signalled that IOM at times does not show up or remains silent in the meeting. While possibly related to the atmosphere of the group, this was regretted as depriving the working group of valuable input and learning.

⁵⁰ Idem with IOM protection colleagues.

⁵¹ Internal L3 review meeting minutes. UNFPA Rohingya Humanitarian Response – monthly situation report March 2018:4 signals that UNPFA held a 'GBV and Site Planning' workshop for government, site management, protection and other actors, "to ensure GBV prevention is factored into the planning." This suggests that protection (GBV), at that time, was not yet sufficiently integrated with site planning.

⁵² Idem and notes from an internal L3 internal reflection and discussion day, 7 July 2018.

not one of IOM. This is (still) a wider perception, reinforced by IOM not being part of the global Strategic Advisory Group on protection. INGO people interviewed in Cox's Bazar opined that IOM's protection work in practice there is better than that of UNHCR. IOM colleagues feel that UNHCR quite intentionally denies IOM recognition for the relevance and quality of its protection work.

c. Conclusions

Protection needs remain unmet: The refugees have many legal but also physical protection need that remain unmet in the collective response. Partially this is the result of lack of enough agencies with protection expertise, insufficient experienced staff among the agencies present, and insufficient funding. Partially however also because of an unjustifiable lack of integration of protection from the outset and in basic services sectors, in contradiction with established good practice and guidance. Also the risks of PSEA and trafficking have not been rapidly and effectively addressed in the response as a whole.

Law and order: To maintain the civilian character of the response, the aid community has encouraged a greater role for the Bangladesh police rather than the army. Attention remains required to the evolving sense of security of the refugees, who at times have expressed a higher degree of confidence in the army than the police.

Prevention: Competent efforts are made to provide case management support to survivors of GBV. But as a significant proportion of GBV seems to occur among refugees, prevention requires more active mobilisation of community leadership and community-based protection practices.

Information sharing: The sharing of protection data between agencies runs into similar problems as with population data. This needs to get resolved.

More organisational support: Not in the least because of the alarming levels of GBV and trafficking, the protection work can benefit from more attention and support from Dhaka and HQ for this response. IOM has at times been slow in deploying enough experienced people to fill key protection positions. But support is also needed in terms of wider advocacy and the pursuit of better funding. IOM protection colleagues in Cox's Bazar regularly organise donor visits with a focus on protection and counter-trafficking and provide briefings. But the organisation is not currently widely perceived as one with significant protection expertise. The Rohingya response may be one experience on which to build to strengthen the institutional capacities and expertise on protection. IOM institutionally is also not set up for lobby/advocacy work, which has a different purpose and conveys issues differently than the Communications Department does.

Recommendations related to Protection

R1: HQ, CO: Highlight more, to donors and the GoB, the continuation of unmet protection needs, advocating for more funding and acceptance of more protection specialists.

R2: HQ: Deploy additional staff with solid protection, PSEA and CT experience to support the awareness raising and training of IOM staff, partners where needed and other agencies.

R3: Cox's Bazar emergency response: Ensure that protection (and AAP) are integrated in site management and technical sectors from the outset, formally via terms of references for sectors and working groups and their coordinators, and in practice via briefings to new recruits and ongoing monitoring of staff behaviours and operational outcomes.

R4: HQ: Integrate protection into the L3 procedures and expand the institutional capacity to rapidly deploy very experienced protection staff to multiple complex crises simultaneously, over time establishing IOM as an active player in protection.

4.3 Communicating with Communities/Accountability to Affected Populations

a. Description

IOM commitment: IOM endorsed the five Commitments on Accountability to Affected Populations (CAAP) as part of the framework for engagement with communities, agreed by the IASC in 2011. The revised version was developed and endorsed by the IASC Principles in November 2017. IOM is part of the IASC global task force on AAP and the Prevention and Protection from Sexual Exploitation and Abuse (PSEA). In 2017 it developed its own organisational framework on AAP, to mainstream this in all its humanitarian work. In Bangladesh, IOM has been an active collaborator in the Shongjog network.⁵³ IOM has also endorsed the 2016 Grand Bargain which includes a commitment to a ‘participation revolution’.

CwC Working Group: In March 2017, IOM initiated a Communicating with Communities (CwC) working group in Cox’s Bazar. The objective was a collective Community Response Mechanism that would serve to provide information to target populations, identify issues and act as a referral system to different service providers.⁵⁴ IOM maintains the Working Group coordination after the -influx since end August 2017.

In October 2017, there is an attempt to create an online ‘Community Response Map’⁵⁵ (managed by the media division in IOM HQ) to centralise information on the 4Ws (what, where, when and who). The initiative had mixed results, partially because of lack of buy in and not all agencies wanted to report into the common platform.

CwC/AAP in Appeals: In the first IOM Appeal (October 2017), US \$ 2.3 million is requested for CwC. The key activities detailed are messaging to the populations, helping people get access to information via information kiosks/posts and community outreach teams; seeking feedback through open air meetings, household visits and target community consultations; awareness raising and feedback on community stabilisation and conflict reduction between host community and refugees; and capacity-building of field staff.

This resonates closely with the HRP, (to which the CwC working group contributed) which also puts CwC rather than AAP as heading, acknowledges information needs of refugees (and the extra challenges women and girls, the vulnerable, extremely vulnerable and people with disabilities may face to access information), as well as the risk of tensions between ‘old’ and ‘new’ refugees and between both and the host community. The HRP envisages the same activities, brought together in a ‘common services model’, that the CwC working group is expected to implement. In a later phase, the HRP sees more in-depth community engagement training, and a shift towards more community-led communications activities.⁵⁶

IOM’s second appeal (March 2018:22) changes the heading from CwC to AAP, for which US \$ 1.2 million are requested. IOM now closely works with and part funds a consortium of BBC Media Action, Internews and Translators without Borders. It describes itself as “*at the forefront of ensuring that Accountability to Affected Populations remains at the core of the response in Cox’s Bazar and that its principles are incorporated into all programmatic interventions.*” Participation, information sharing and feedback and complaints mechanisms are presented as the three pillars. The stated

⁵³ www.shongjog.org.bd.

⁵⁴ ISCG/ emergency IACM meeting, Cox’s Bazaar, 30 March 2017, Meeting Notes, p. 1.

⁵⁵ CwC Working Group, November 2017, Meeting notes.

⁵⁶ CwC objectives in the HRP are stated as 1. A coordinated approach for communication with communities promotes life-saving behaviours and practices and improves access to services. 2. Consolidated approaches to feedback collection and data sharing ensures effective accountability to affected populations. HRP, p. 30.

objectives are 1. “*Mainstream all principles of accountability and community engagement across all of IOM activities, to ensure all affected populations have access to information to allow them to make well informed decisions **about their lives***” (emphasis added), with a target of 80% of all affected people; 2. Ensure that feedback and complaints mechanisms reach all members of the affected communities (...) and that complaints are acted upon, resolved and any programmatic adjustment is made in a timely manner.” The target is 50% of people in IOM and IOM implementing partner sites use available feedback and complaints mechanisms; 3. “*A (...) inclusive approach to communication that takes into account the language and literacy issues of this response to improve two-way engagement.*” The target is 80% of CwC WG partners using the collective service approach to make course corrections, plan responses and generally ‘close the loop’.

The JRP on the other hand continues to use CwC as major heading, because the CwC WG is represented in the JRP (p. 67). It acknowledges persistent information needs among all affected populations, and real challenges in communicating with Rohingya. It mentions the need to use a wide range of communication channels, and to get feedback through flash focus groups, key informants and community correspondents who will be trained for rumour tracking and fact checking with communities. As the monsoon and cyclone season are then approaching, an Emergency Communications Task Force will be established with the CwC WG. It envisages a “*common feedback mechanism to enhance accountability to affected populations*” (p. 32) Somewhat unusual, ‘accountability’, ‘do no harm’, and ‘participation and empowerment’ are presented as three of the four criteria of **protection** mainstreaming across all sectors and partners (p. 33).

Assessments: Between both sets of appeals, several surveys are conducted that become a reference for the collective response, such as Internews’ “Information Needs Assessment” (Nov. 2017), Christian Aid and GUK’s “Accountability Assessment” (Feb. 2018) and “Childhood Interrupted. Children’s Voices from the Rohingya refugee crisis” (Feb. 2018, by World Vision, Save the Children, Plan International). A “Humanitarian Feedback Bulletin: What Matters?”, in English and Bangla, starts being produced as of late Feb. 2018. Its monthly issues collate feedback from affected communities. Finally, also in February 2018, an ‘Accountability Subgroup’ produces an ‘Accountability Manifesto’.

Further CwC/AAP initiatives: As the monsoon and cyclone season approached, the CwC WG created an ‘Emergency Communications Taskforce’ and initiated an intersectoral project with the Emergency Telecommunications Sector. Also, site management focused on preparedness and early warning messaging, using outreach teams to communicate with households in high risk locations.⁵⁷ IOM conducted an extensive series of FGD on cyclone preparedness, monsoon impacts, landslides etc. Others, like BRAC and the IFRC, also conducted FGDs on people’s knowledge about extreme weather in Bangladesh, their perceptions of safety measures and whether they have a plan what to do.

In February 2018, Internews initiates its Rumour-Tracking methodology. Rumours will be picked up from Rohingya community correspondents, and agencies with field staff, and discussed in audio-programmes in Rohingya.

Also in February 2018, in line with its AAP commitments, IOM decides to create a role for an AAP focal point within its Rohingya response to integrate this more widely in programming. Due to delays in filling the post of the CwC WG coordinator, one person had to maintain the double responsibility. Consequently, AAP de facto received less attention. A new CwC WG coordinator was scheduled to start in August 2018, which should free up more time to devote to AAP in IOM programming. The IOM PSEA focal person is also co-chair of the PSEA Working Group. The PSEA focal point will work closely with the AAP focal point to provide staff training.

⁵⁷ ToR Emergency Communications Subgroup; March 2018: Intersectoral Project between ETS-CwC Working Group; Site Management Sector: Communication for Households at Risk.

In April, UNHCR started a discussion whether the CwC WG can influence the community leadership model.⁵⁸ There had been many complaints from the refugees about corruption in the majhi system. As one step to address the issue, the Site Management sector drafted a Code of Conduct to create more transparency about the responsibilities and accountabilities of majhis, for discussion.⁵⁹

By the summer of 2018, the CwC WG has a target of one Information Hub per 12,500 households in every camp, with the aspiration to open more, and add internet, projectors etc. to key hubs. They serve as referral centres to services within and beyond the camp and are one potential channel for feedback and complaints (other channels are Rohingya outreach and community mobilisation colleagues, e.g. in health and protection).⁶⁰ Information hubs are an important strategy to more clearly link CwC with site management. IOM in its own operations is exceeding this target with a Feedback and Information Centre (FIC) (in IOM terminology) per 10,000 households. For IOM the FIC are the formal channel for feedback and complaints mechanisms.⁶¹ The CwC WG has been working on a Joint Community Feedback System Protocol for (Feedback and) Information Hubs.⁶² The pre-final version of the document was circulated among the CwC WG partners three months previously, however at the time of the RTE this document was still not signed off.

Radio is a potentially powerful communication mechanism. The Emergency Technical Communications group works with the GoB to extend coverage. But improved coverage does not immediately resolve the language problem. It is not until June-July 2018 that Internews and Fondation Hirondelle (in Jamtoli camp) start producing their first narrowcasts, created with Rohingya involvement, and testing the approach with listener-discussion groups.

Recent Assessments: A Ground Truth Solutions survey, published in August 2018, indicates fair satisfaction levels among respondents about their relationship with aid providers, and the information they get. Still, about half felt they could not influence aid delivery decisions, one reason being that (mostly) only majhis are consulted. The survey again confirms that complaints (and suggestions) will mostly be made through personalised channels.

b. Observations and Reflections

A difficult challenge: An appreciation of what was achieved, or not, after 10-11 months, needs to take into account the tremendous site development and life-saving challenges, prolonged with the arrival of the monsoon and cyclone season. To this must be added language barriers, GoB restrictions, and the

⁵⁸ The CwC Working Group, Minutes of Meeting, Wednesday 4 April 18 mention that UNHCR produced a report in 2017 about the process of establishing a more democratic system to replace the majhi system.

⁵⁹ CwC Working Group, Minutes of Meeting, Wednesday 4 April 18. This was never mentioned to the RTE team during its field work, nor was such draft shared.

⁶⁰ One Information Hub visited by the RTE was well located next to a major throughway footpath, and with a Bangladesh and Rohingya woman situated in front of the structure, maximising physical and social accessibility. Still, as per their testimony, most people approaching them were Rohingya men.

⁶¹ Statement from IOM colleague. A survey published by Internews in June 2018 on Humanitarian Feedback Mechanisms here, indicates that aid agencies use a much wider range of feedback mechanisms (p. 13). The RTE team believes this to be the case also for IOM which in its own operations also conducts e.g. surveys and FGDs. The information hubs/helpdesks of many agencies are also multi-purpose, and not only to serve for feedback and complaints. Internews 2018:37

⁶² The rationale of the proposed collective protocol is “ensuring the feedback is collected, disseminated to the right people, and meaningful action and response given, it will contribute to a more efficient, relevant and localised response. In coordination with service referral pathways, this system will enable a mechanism that can assist in people being able to make informed and good decisions for themselves and their families.” Draft minutes, CwC WG, 11 July 2018.

general fear and distrust of authorities Rohingya carried with them from Rakhine State. By July 2018, IOM is also still facing difficulties to reach Rohingya women.⁶³

Early and active IOM engagement: Early in the response, 120 CwC field assistants (mostly with Chittagonian language skills) were employed and trained to be able to answer simple questions, give directions, hold information meetings and -initially- take and respond to simple complaints. In late December 2017 these were rolled in into site management as field assistants but maintained (if they chose) their CwC responsibilities. IOM has pursued engagement with the refugees also in several other ways: e.g. in its site management through a network of community mobilisers, house visits, a ‘women participation survey’⁶⁴ and a ‘participatory site safety audit’.⁶⁵ This also involved the training of staff of several other organisations, who would act as enumerators, in qualitative and quantitative data collection, GBV, and facilitation of FGDs. IOM has also organised multiple FGD on other issues and set up a growing number of Feedback and Information Centres. Notwithstanding, in July IOM colleagues still observe “*lower commitment of national staff to the process of AAP and of international staff to make the reasoning understood.*”⁶⁶ And the RTE team was not given any examples of corrective action resulting from feedback, other than related to reference-signs in the camps.

Relevant and positive actions: Through its CwC WG leadership, IOM has brought different actors together and created broader momentum for intentional engagement with the refugees. Life-saving messages and behavioural change message have been developed and, together with other resources, are available for download by all sectors. The CwC WG has added value by its attention to translation. On occasion, feedback revealed misunderstandings and led to corrective action. One example cited for this are directional signposts in the camps.⁶⁷

Appropriate initial emphasis on information needs and communicating to communities: In the initial chaotic months, this was the right priority. Understandable in the context, the emergency-within-emergency of the monsoon and cyclone season, prolonged the emphasis on messaging. The RTE team heard from some interlocutors that there was a lot of focus on messaging and a lot of effort had been expended on that in the CwC working group however, it was not always effective. This was further confirmed in the CwC working group meeting “*Communication resources are created by CwC but often not implemented and there is not yet a matrix to track who is using/distributing our materials. Feedback on knowledge gaps don’t get feedback to the group. CwC partners often are not successful in advocating within their own organisations for importance of communication with communities. It needs to be operationalized within agencies.*”⁶⁸

Collective initial failure: Complaints boxes and hotline phone numbers: It is hard to understand why many agencies, including IOM, used these as primary mechanisms, for a population whose high illiteracy rate they constantly refer to, and who is not entitled to a Bangladeshi SIM card (even if several Rohingya have acquired such). In February 2018, a system of telephone hotlines was still being discussed as a central pillar of FCMs, even though individuals in close contact with Rohingya already knew they would not comment on sensitive issues except directly and with a person they trust.⁶⁹ This is all the more disappointing, as problems with complaints boxes and the preference for

⁶³ L3 review meeting on 7 July.

⁶⁴ IOM May 2018: Preliminary report – Bangladesh. Women’s Participation Project.

⁶⁵ Communication from IOM colleague. The RTE team did not obtain the participatory safety audit report.

⁶⁶ L3 review meeting on 7 July.

⁶⁷ This begs the question, if Rohingya had been involved in creating the visual signposts from the outset, the initial inappropriateness could have been avoided?

⁶⁸ CwC WG minutes, 11 July 2018.

⁶⁹ Interviews in Cox’s Bazar by an RTE member under an earlier, different mandate.

face-to-face feedback were identified prior to the L3 crisis.⁷⁰ The June 2018 report of Internews still observes that “a lot of agencies depend on feedback boxes to engage with the community.”⁷¹

Information hubs as feedback and complaints mechanisms: In April, it was reported to CwC working group that “Despite significant explanation, FGDs did not know about info hubs.”⁷² Most participants in the RTE team conversations with Rohingya in July also did not know about the information hubs or rarely use them. Survey results published in August 2018 indicate that only 5% of men used an information desk for providing feedback.⁷³ Yet another survey of Sept. 2018 finds that “information hubs are being visited, and people who have been keep going back and would recommend them to others.”⁷⁴ This is in line with NPM which also indicate that over time the (Feedback and) Information Hubs become more important sources of information. Remarkable however is also the importance of the Bangladesh army as source of information for the refugees.⁷⁵

Radio: IOM has already distributed several tens of thousands of radios, but a recent survey found that radio listenership remains low in the camps.⁷⁶ If COAST Trust, a local CSO with experience in community radio and now working in partnership with the Fondation Hironnelle, can obtain a license for an FM frequency, this could become a meaningful expansion of the communication and information efforts to a different level, even if there remain GoB constraints on how much the Rohingya language can be used, and what can be discussed.

Slow integration of AAP in collective Site management and technical sectors: The need for IOM to integrate AAP into site management was pointed out in the 2014 RTE of the South Sudan crisis response. The RTE team understands that, within IOM’s own programming in the Rohingya response, an AAP focal point sits within its own site management, which is a very positive evolution. However, if AAP is not so structurally integrated in the Site Management sector, which IOM co-leads, then this raises the question why the difference? The cluster’s ‘Camp Management Tool Kit’ (already in its 2008 edition) is clear on *participatory* approaches from the outset.⁷⁷ Site management as a sector may, understandably, have been very absorbed for many months on the physical creation of sites, followed by risk reduction as the monsoon and cyclone season approached. But, as for protection, AAP (as more than messaging) has only very slowly come to be more connected to it, and to technical sectors such as shelter or WASH. This appears to have been a general problem in the response and may be partially related to the proliferation of sectors and Working Groups that several actors see as having been siloed for too long⁷⁸, and delayed site-based coordination. (see the section on Coordination).

Funding shortfalls – and funding delays: An IOM external update of early June 2018 indicates a funding gap of 84% for its US \$ 1.2 million requested. Such dramatic shortfall obviously affects

⁷⁰ E.g. Proaction Alliance 2017: Improving Access to Health, WASH services, education and freedom from violence in Cox’s Bazar. End of Project Evaluation: 4.2.1.

⁷¹ Internews June 2018: Humanitarian Feedback Mechanisms in the Rohingya Response p. 14

⁷² CWC Working Group Minutes of Meeting, Wednesday 18 April 2018.

⁷³ Ground Truth Solutions Bulletin 2 Feedback and Trust, August 2018.

⁷⁴ Bailey, N. et alii Sept. 2018: Evaluation of the Common Service for Community Engagement and Accountability for the Rohingya Response, p. 5

⁷⁵ See e.g. NPM Round 11 of July 2018, p.15

⁷⁶ Bailey, N. et alii September 2018: Evaluation of the Common Service for Community Engagement and Accountability for the Rohingya Refugee Response, p.18

⁷⁷ E.g. pages 22, 30, 31, 33, 34, 35, 36, 42, 44, 53.

⁷⁸ E.g. UNHCR June 2018: Protection Support Mission. Cox’s Bazar, Bangladesh p.2: “the overall response remains siloed by sectors, with a complicated coordination structure and unclear accountabilities for protection.”

performance. When funds were available however, IOM partners indicate lengthy delays in finalising the contracting and releasing of instalments.⁷⁹

Right to Participate – Commitment to a Participation Revolution

CHS Four: *Communities and people affected by crisis know their rights and entitlements, have access to information and participate in decisions that affect them.*

Grand Bargain Commitment 6: *“We need to include the people affected by humanitarian crises and their communities in our decisions to be certain that the humanitarian response is relevant, timely, effective and efficient. We need to provide accessible information, ensure that an effective process for participation and feedback is in place and that design and management decisions are responsive to the views of affected communities and people.”*

Confusion about CwC and AAP: The RTE team uses a particular understanding of these terms. In that understanding, CwC, as the name signals, is more a ‘communication effort’, that includes messaging to a community, getting messages back and ensuring that not too much gets lost in translation. AAP in a narrow sense is often understood to be FCM, followed by ‘response’ to ‘close the loop’. PSEA is normally integrated with AAP but is indeed also a protection issue. AAP in a deeper sense extends to substantive participation in decision-making, not only about aid services but also about non-aid related issues that affect the present and future of a population. This would correspond to the ‘interactive’ and ‘ownership’ degrees of participation in the table on page 36. It is possible to communicate very well without being very accountable, and to be accountable and responsive without enabling substantive participation in decision-making. Participation is pro-active, while FCM remain reactive. In that sense, CwC is only part of AAP – although it is sometimes confused with it.⁸⁰

FCM, even with the loop closed,⁸¹ does not equate to genuine participation, or the ‘participation revolution’ that signatories of the Grand Bargain, including IOM, have committed to.⁸² It is noteworthy that the ToR of the CwC WG maintain a focus on ‘services’ and do not mention ‘participation’. Participation requires active involvement of affected populations from the very outset, even in the problem identification, the weighing of different options, and the design of an intervention. As per the Core Humanitarian Standard: *“Communities and people affected by crisis know their rights and entitlements, have access to information and participate in decisions that affect them.”*⁸³ The original March 2017 job description for a national programme officer⁸⁴, to lead IOM’s CwC’s work

⁷⁹ RTE interviews.

⁸⁰ E.g. CwC Handbook for Greece, July 2016 (version 1.1.), p. 3.

⁸¹ Which cannot be taken for granted: The RTE team heard several comments about WFP staff not responding to people complaining they were not on a list or did not get rations, even when alerted by international staff from other agencies.

⁸² A review of AAP practices of Swiss NGOs to the Nepal earthquake response considers all relevant aspects: providing information, listening to affected people, complaints handling and responding to feedback, and engagement in decision-making. Routley, S. & S. Bogati 2018: AAP: A review of approaches and practices in the Swiss Solidarity funded response to the Nepal earthquake. <https://www.alnap.org/help-library/accountability-to-affected-people-a-review-of-approaches-and-practices-in-the-swiss>.

⁸³ Also referenced in the Christian Aid and GUK report “Accountability Assessment Rohingya Response Bangladesh”. Feb. 2018).

⁸⁴ Vacancy notice: “IOM is looking for a national programme officer (...) to be responsible for managing the ‘Communication with Communities’ (CwC) intervention for the IOM Cox’s Bazar intervention and providing leadership to the CwC working group in Cox’s Bazar district.

and the newly created CwC WG in March 2017, required both media and communications and community development skills. Few individuals will be equally experienced in both. The job description for IOM's CwC Technical Officer in Cox's Bazar (September 2018), envisages the post holder to work closely with the AAP advisor, but the task list covers community FCM, community participation and accountability. This is confusing. IOM needs to be consistent in its use of the terms, the practical meanings covered by each, and the core competencies required. A 'communications persons', in the sense of someone with media-related expertise, has and requires different skills from a 'participation expert'.

After an appropriate initial emphasis on CwC (and messaging, info provision and referrals), and notwithstanding the changed heading between both IOM Appeals, there is still a way to go, for IOM and the aid agencies, to deepen the engagement towards the narrower and broader understandings of AAP.⁸⁵ The same observations has been made in several recent reports (e.g. Internews June 2018, ICVA Mission Report and ODI HPG reports of August 2018, cited *infra*.)⁸⁶

This is an organisation-wide issue, not just a Rohingya response one. In several IOM country programmes, though not in Bangladesh,⁸⁷ CwC projects are currently supported and advised on by the Communication Division. In recognition of the need for a more consistent approach and to integrate AAP into IOM's humanitarian response, last year IOM commissioned the development of a framework for accountability to affected populations.

Signals that change is needed: By February 2018, various signals were emerging: The Christian Aid and GUK report signalled a low understanding of rights related to humanitarian assistance, and that current accountability mechanisms are largely ineffective. It also highlighted that Rohingya prefer verbal and face-to-face mechanisms and express a lot of concern about confidentiality – not surprising given the atmosphere they had to live in in Rakhine State. The 'Accountability Manifesto' sets out a series of actions in response to these findings. It signals that FCM need to be designed for a camp remit, and not per individual agencies, as Rohingya do not understand the complex humanitarian system.⁸⁸ In other words AAP, also in the narrow sense, is still not yet part of an integrated site management system. The overall shortcomings in AAP were also picked up in the RTE of the UK Disasters Emergency Committee agencies, which became public in March.⁸⁹ Pertinently, it puts the finger on "*an even more prominent gap (is) the lack of information for refugees regarding relevant scenarios for the near future*", and holds that "*information sharing with refugees should go beyond the context of the delivery of services,*" (p. 25) which leads to the next point.

The right to information: beyond aid services. Open conversations with Rohingya reveal that, now that their life is not under immediate threat, they are able and willing to comment and reflect on their whole experience and have concerns beyond access to basic services. Not surprisingly, for the world's largest stateless population, these include their rights, and major decisions that will affect their very uncertain future. Two significant issues of concerns, brought up with the RTE team, were the possible relocation to the Bhashan Char island and the nature of repatriation agreements.

⁸⁵ The ToR of the CwC WG (no date) refer to accountability. It is not clear why the WG is called 'CwC' and not e.g. the 'Accountability Working Group'. The IASC has an AAP Operational Framework, and IOM in 2017 commissioned an organisational AAP Framework, not a CwC Framework.

⁸⁶ The RTE team also heard comments about WFP staff not responding to people complaining they were not on a list or did not get rations, even when alerted by international staff from other agencies.

⁸⁷ One IOM colleague, with an important role in the early emergency response, indicated that the team in Cox's Bazar explicitly did not want a strong involvement of the HQ Communications Dpt.

⁸⁸ An observation also made in the Internews June 2018 report on Humanitarian Feedback Mechanisms p. 19

⁸⁹ Schenkenberg, E. & M. Thomas 2018: Real Time Response Review of the DEC Emergency Appeal for People fleeing from Myanmar, p. 25.

Relocating tens of thousands of refugees to an island was a proposal already floated by the GoB in 2015, with Thenghar Char in mind. It has persisted, now with Bhashan Char as target location, notwithstanding expressions of concern during 2017 and 2018. Recent reports indicate that the GoB plans to implement this before the next monsoon season. Speaking with ordinary Rohingya and community leaders in July 2018, the RTE noted they had heard rumours about it, but not received any clear information, if only that aid agencies are concerned about it and in discussion with the GoB. The question is whether respected Rohingya will be invited to participate in any assessment visit, that the UN in any case wants to conduct – or will have to rely on descriptions from GoB and UN officials only?

The non-disclosure of the content of the June 2018 MoU between UNHCR, UNDP and the GoM certainly undermined trust among the Rohingya. UNHCR’s perspective is that it was up to the GoM to release the agreement.⁹⁰ In the end, it only became available to Rohingya because it was leaked. This does not seem in accordance with the stated principle that “*any future decision affecting the refugees should include the refugees themselves*”, or that any negotiations with a state will “*always take into account the concerns of the refugees*”.⁹¹ Two July 2018 surveys conducted by Ground Truth Solutions (Bulletin 2 & 3), supported by IOM, NPM, Internews and Translators without Borders, confirm the importance of the issue for the refugees to feel optimistic about the future.

⁹⁰ Interview with UNHCR official.

⁹¹ Idem.

The ‘Smart Card’

Recently, the Government of Bangladesh and UNHCR have started issuing identity cards to Rohingya refugees. UNHCR sees this as major progress: A year ago, only some 33,000 Rohingya were officially registered in Bangladesh, though there were an estimated 200-250,000 ‘Undocumented Myanmar Nationals’. Now over 900,000 people get official recognition of their existence in Bangladesh. Aid agencies also appreciate as very significant, the statement on the card that its bearer cannot be forcibly returned to Myanmar.

Rohingya leaders on the other hand are upset that their new cards do not acknowledge them as refugees and particularly do not mention their Rohingya identity. From their perspective, this is the same denial of their identity as that of the Government of Myanmar. As Myanmar gives rights only to recognised ‘ethnic identities’, and ‘Rohingya’ is not one of those, this is directly relevant for them in light of a possible repatriation. International actors hold that mention of an ‘ethnic identity’ is against common international practice, as rights are not and should not be dependent on such. They will also point out that there is a small number of Hindus among the refugees, who do not identify as ‘Rohingya’.

Rohingya also express frustration that they have not been consulted prior to the launch of the registration exercise. For them it evokes the annual ‘family information collection’ campaigns by the Rakhine State authorities, which historically has served their structural marginalization. They are very concerned about especially the biometric data. It remains unclear what data will be shared with the GoB and eventually come in the hands of the GoM. The possibility for Rohingya to provide ‘informed consent’ is practically speaking non-existent.

Claims are made by some key players that major communication efforts are underway to explain what the text on the identity card means and does not mean. Other assistant providers deny this, and even see signs of reluctance among aid providers to engage with Rohingya on issues that go beyond the provision of material goods and services.

The point is not whose interpretation of the ‘Smartcard’ is ‘right’ or ‘wrong’, but that there are very different interpretations of this important issue, that cannot be addressed with ‘messaging explanations’. They require extensive small group and public conversations, and patient and honest answering of questions. That is a significant shift from the prevailing transactional relationship so far between Rohingya and those who are there to help them.

They also expressed deep upset over the ‘identity’ cards that the GoB and UNHCR have started introducing, a point picked up by the same Ground Truth Solutions surveys. The text box summarises the issue.

Some IOM colleagues consider the repatriation agreement and the registration card to be issues for the GoB, UNHCR and the GoM. As they are outside the control and mandate responsibility of IOM, they argue it is not their concern.⁹² The RTE team disagrees with this for two reasons: First, if we are serious about communicating with communities and substantive participation, we need to be ready to hear all issues they raise and not just those for which we have direct responsibility. Even if it is not up to IOM to enter into conversation with the refugees about the MoU and the Smart Card, it has a clear obligation to raise these concerns and complaints to the agencies directly concerned, and to ensure they are properly addressed. The INGOs did not hesitate to do so, in a July 2018 letter to UNHCR. Secondly, IOM co-chairs the SEG, the leadership of which shares a collective accountability for the overall response.

⁹² Comments on the first and second drafts of this RTE.

The right to participate: Aid agencies struggle with questions of great importance to the Rohingya, such as:

- Is everybody able to access the services they need and are entitled to?
- How can we reduce the levels of gender-based violence among refugees?
- What does ‘access’ mean in practice, on what terms is that access gained?
- If we do not have the budget to maintain the same level of service, where do we cut?
- What can we do to reduce tensions between the refugees and the host population?
- How do we change the Rohingya role in the settlement governance, without future manipulation and obstruction by disgruntled majhis? And how do we ensure that elected representatives maintain their integrity and do not abuse their power?

Involving respected Rohingya in these reflections would have multiple benefits: They may bring ideas and options that we have not thought about; they will share with us the responsibility for difficult decisions; they will help explain to their population why certain decisions were made. It will also signal that they are recognised as a community and as people with a right to a voice and a say in what is decided about them. It will build trust between a population in distress and those who have come to help them.

The table on the next page⁹³ indicates degrees of ‘participation’.⁹⁴ The RTE team’s impression is that - generally speaking- after one year the overall response operates mostly in the lower three tiers: passive, information transfer, consultation.

An ICVA NGO support mission (July 2018:4) concludes: *“After 10 months, the lack of an overall, coordinated approach to community engagement and accountability in the response has raised concerns amongst many stakeholders. In particular, it has been noted that the ISCG Communicating with Communities (CwC) Working Group has not had a dedicated coordinator in place for almost 6 months. Although some good examples of communication with, and accountability to, refugee and host communities are emerging in the response, these appear to be being developed by NGOs at individual-camp level and do not seem to be well connected.”*

An ongoing collective challenge was also identified in an ODI report of the same period: *“many pointed to communication as an area where there was a big gap between need and response, with the main challenge mentioned being issues of language and translation. (...) At a deeper level, communication opens a channel for aid agencies to start to understand trends, priorities and concerns as articulated by Rohingya themselves. Developing an understanding of broader issues is not always easy, however, as many agencies tend to pose narrow questions and guide answers, designed to extract feedback from beneficiaries about particular projects. As one respondent from a communications agency said: ‘We haven’t been asking the right questions, and we’ve been satisfied with answers without probing.’ (...) The key innovation here is ‘the difference between listening to what people want to tell us or just focusing on what we want to ask people’.*⁹⁵

⁹³ Camp Management 2015: 46, co-produced by IOM

⁹⁴ IOM colleagues are familiar with it, as the levels are used in slide 12 of the PPT of 30 Jan. 2018, sharing the findings of the “Study on Women’s Participation in Camp Life”.

⁹⁵ K. Holloway & L. Fan August 2018: Dignity and the Displaced Rohingya in Bangladesh. ODI, HPG Working paper pp. 12-13

Degree of Participation	Definition
Ownership	Communities control decision-making and other partners facilitate their ability to utilise resources. There is therefore greater ownership and a stronger sense of belonging and responsibility.
Interactive	Communities are completely involved in decision-making with other partners.
Functional	Communities are involved in one or more activities, but they have limited decision making power and other partners continue to have a part to play.
Consultation	Communities are asked for their opinions, but they do not decide on what to do and the way to accomplish it.
Information Transfer	Information is gathered from communities, but they are not taking part in discussions leading to informed decisions.
Passive	Knowledge is shared with communities, but they have no authority on decisions and actions taken.

In conversations with the RTE team, Rohingya expressed their feeling disempowered, in concerning terms: *We may be illiterate, but we have life experience!*”, *“We are being treated as objects, not as subjects.”* *“The situation here is not radically different from our experience in Myanmar.”*⁹⁶ The JRP⁹⁷ recognised this: *“Rohingya refugees have been stripped of power and control, over even the most intimate aspects of their lives.”* The current prevailing operating modalities of the aid agencies do not fundamentally reverse this.

The humanitarian discourse and paradigm inadvertently contribute to this: The constant framing of the most affected population as ‘vulnerable’ and ‘in need’, and in the case of the Rohingya also as ‘traumatised’, reproduces an image of a population without capacities, without an ability to make thoughtful choices in situations of dilemma, and generally without ‘agency’. For some, this reinforces negative

stereotypes of the Rohingya.⁹⁸ The large Rohingya demonstrations, during World Refugee day (20 June) and on the anniversary of the latest refugee crisis (25 August), signal their intent to reclaim ‘agency’, and that there are other Rohingya leaders than only majhis.

Allowing refugees more meaningful participation in issues that directly affect them, could be a significant contributing factor to reducing some of the mental health problems that are currently so prevalent.

All this raises the question of who can credibly speak for the Rohingya – and takes us to the planned governance reform.

The right to participate in one’s own governance reform: A worrying example of the denial of this right is the lack of information to Rohingya about the planned ‘governance reform’. The purpose is to replace nominated majhis with elected people as a site or ‘camp’ committee.⁹⁹ Site management, led by IOM and the DRC, are actively involved in the ‘governance working group’.¹⁰⁰ The issue has fed into the inter-agency tensions, as UNHCR has been perceived or portrayed as supporting the elected system and IOM as wanting to stay with the majhi one.¹⁰¹ To the RTE team, IOM expressed a more

⁹⁶ Different Rohingya interviewed during the RTE field mission.

⁹⁷ March 2018, p. 12/55.

⁹⁸ The Humanitarian Response Plan acknowledged the presence of social stereotyping, as well as tensions between ‘old’ and ‘new’ refugees. Oct. 2017: 30. The CwC WG’s discussions about “the lack of social shame”, also signal a judgmental mindset that is not conducive to understanding why forms of fraud and corruption happen, and how to reduce the incentives.

⁹⁹ The choice of the word ‘camp’, ‘settlement’ or ‘site’ matters. ‘Camp’ can feed into a future scenario of ‘internment’ of the refugees. ‘Camp Committees’ suggest that they can only speak for the refugees concerning matters related to services, denying them a ‘political’ voice. The RTE team supports the systematic use of the neutral term ‘site’.

¹⁰⁰ IOM can also bring in its experience with ‘para development committees’ (collective sites with also host community members, or neighbourhoods where host communities and refugees live side by side).

¹⁰¹ Interview with senior IOM colleague in Dhaka.

nuanced view¹⁰², but it may not have been able to communicate this then more widely and effectively. A survey published in September 2018 notes that majhis are the main and now the most trusted source of information for the refugees.¹⁰³ This is an observation to be taken serious but also with caution: The aid agencies have turned the majhees into the principal interface with the refugees, who therefore tend to have privileged access to information and become an important channel for feedback. But information control is also a source of power.

RTE team conversations in July 2018 with a group of 25 informal Rohingya leaders from ten different camps, and which included an imam and a majhi, revealed none of them had heard about the governance reform process and working group, even though first elections had been organised in a camp in Teknaf in that period. More importantly, no Rohingya were invited to be part of that working group, or actively contribute to it. A CSO that is strongly embedded in the Rohingya community requested to be a member of the working group: The request was denied.

A UNHCR document '*Proposed Guidelines for Uniform Camp Committees*', undated but with a version possibly already in existence since early 2018, was not widely available in July, not even among international agencies. Its first sentence is: "*Meaningful participation of refugees in all aspects of their lives is important in helping them regain their dignity and civic engagement.*" The document makes no reference to the governance experiences of Rohingya communities in Rakhine State, nor to what could or has been learned from governance changes in the two officially recognised refugee camps prior to this latest crisis. IOM colleagues claim to have strongly, but unsuccessfully, advocated for community representation and agency accountability to communities in the elaboration of these guidelines. The RTE team cannot verify this, but would expect all aid agencies to provide the refugees with periodically updated information about the process, even if the refugees are not allowed to participate.

From an empowering community participation perspective, the run up to site/camp elections should not only be a time to provide refugees information about the electoral process, but also to reflect on what types of leaders they need. Relevant questions they could usefully discuss among each other, with only process/methodological support from outsiders are captured in the text box.

¹⁰² That not all majhis should be portrayed as corrupt and abusing their power, and that the conversation should focus more on the purpose and process needed to make the change, not just on positions about one option or the other.

¹⁰³ Bailey, N. et alii Sept. 2018: Evaluation of the Common Service for Community Engagement and Accountability for the Rohingya Response, p. 5.

The Conversation about ‘Leadership’ Rohingya Need to Have Among Each Other

Four questions that the Rohingya can be encouraged and supported to discuss among each other, with strong involvement also of women and youth, are:

- a. *What are our social norms and values, and how do we protect and promote respect and adherence to them, in the face of so much hardship and violence, including among ourselves?*
- b. *How can we more constructively interface with the aid agencies that are here to help us, and work with them to rapidly and effectively solve problems and find acceptable solutions to difficult challenges?*
- c. *How do we position ourselves towards different possible scenarios for our own collective future, how do we deal with different views within our own community, where do we need to be heard and how do we articulate our views and proposals?*
- d. *What leaders do we need to deal with these different challenges, and how do we ensure that they will effectively represent our community, and remain accountable to us? What process will put such leaders forward, without major backlash from those who currently hold power?*

It is unlikely that single Rohingya individuals will have the competencies to be an effective interface and connector in these different areas. A combination of individuals, of different gender and age, might be a better option.

The absence of substantive involvement of Rohingya in the discussions about how to create a more representative and accountable governance structure is in direct contradiction of established good practice, as set out e.g. in the Camp Management Toolkit (2008:77).

“Participation and involvement is part of any social group and fundamental to developing and strengthening a well-functioning community. The dynamics of a particular participatory structure are determined by the culture(s) of the group, and their beliefs, norms, values and power relationships. Best practice for a Camp Management Agency is to observe and understand existing or developing participatory structures and dynamics in the camp, and to use, support and strengthen them, in order to ensure a well-functioning, living and working environment which respects local culture and maximises local skills and capacities.

The aim of participation in camp settings is not just to ensure that different groups have a voice, but that they are heard and able to take part in making crucial decisions which affect their lives. There is a fundamental difference between consultation and participation. Whilst there may be considerable frustrations if a Camp Management Agency does not consult the community, it can be even worse to consult, but then not act on, or simply ignore the recommendations.”¹⁰⁴

c. Conclusions

Challenging conditions and appropriate initial priority: IOM has given appropriate attention to engaging the affected populations, e.g. via outreach workers, a participation survey, FGDs. The CwC WG, which it coordinates, is a valuable component of the overall response. Collaborating agencies like Translators without Borders, BBC Media Action and Internews, and more recently Fondation Hirondelle, are adding value through their efforts to reduce the translation challenges and initiate participatory community radio. IOM appropriately co-funds some of these, though delays in administrative and financial processing have at times reduced their efficiency. An initial emphasis on messaging to the affected populations, and its continuation for the monsoon and cyclone season, were

¹⁰⁴ The chapter continues with comments about the practical limitations of what degree of participation is possible but is firm that in circumstances where this is less than optimal, this has to be discussed and explained, to ensure convergent expectations among all stakeholders.

appropriate. Throughout the first year of the crisis response, repeated efforts have been made to consult with refugees, assess their evolving information needs, and their use of Feedback and Complaints Mechanisms (FCMs). The operational challenges are significant however, and include language barriers, funding shortages and Rohingya preferences for personal communication, particularly on more sensitive issues.

Confusion about the relationship of CwC, AAP and substantive participation: There can be excellent communication without accountability, and accountability without substantive participation in important decisions. There is conceptual but also institutional confusion over this -as noticeable e.g. in job descriptions- which needs to be clarified. There are also different understandings of whether IOM's practices for participation and accountability are limited to aid-programming issues over which IOM has direct control only, also take on those that concern the aid-programming of other agencies, and extend to issues of concern to a population that are not aid-related? As supporter of the CHS and the Grand Bargain, as a UN agency defending various human rights Charters and Conventions and, in this context, also as co-leader for the overall response, IOM's ambition and objective must be substantive participation and accountability, with a readiness to hear and respond to all issues raised. CwC, with its connotations of 'communication', does not adequately express that ambition and obligation.

AAP not mainstreamed: Notwithstanding many good initiatives, including within IOM programming, AAP, like protection, so far has not been fully mainstreamed into the different service delivery sectors of the overall response. There is a multitude of individual agency FCM within the same sites, that are not integrated in a coherent system. Documentation of corrective actions taken would show that 'the loop has been closed' but has not been offered to the RTE team. Most concerning however is the significant participation deficit in the overall response, even if some agencies do well in their circumscribed projects. This is the case in relationship to service provision but even more striking with regard to broader concerns of notably the refugees. The absence of genuine participation of refugees in the current discussions about the reform of their governance is unacceptable. Contributing factors to this can be the multitude of sectors and working groups in the coordination set-up, the possible belief that this is not life-saving and hence not a priority, and the lack of self-awareness about the power that humanitarian actors wield. CwC, as a working group, also has no formal leverage over sectors.

Delayed shift from a needs-based to a rights-based and people-centred approach: Overall, the collective response still has to make the shift from a needs-based to a rights-based and people-centered approach. CwC, or rather 'AAP' understood as aiming for participation beyond FCMs, has a central role to play in this, within IOM and within the response as a whole. This is more than a technical-programmatic issue. It also requires a change in mindsets: The prolonged portrayal of a population as needy, vulnerable and even traumatised, and hence with reduced 'agency', de facto diminishing their ability to influence decisions over choices and actions supposed to be for their benefit. Many reports signal that the Rohingya now demand a greater say in what is being decided for them.

Recommendations on AAP-CwC

R1: IOM HQ/CO/RO: Clarify institutionally the practical understandings of CwC, AAP and participation, with the goal being substantive participation and accountability. The right of refugees (and affected populations) to have a say in matters that directly affect them, beyond basic services, is to be explicitly acknowledged. So too the responsibility to pass on issues that may not be within IOM's remit, to those concerned.

R2: Rohingya response: Accelerate, within IOM programming, through the -renamed- AAP WG and the SEG, the AAP and participation objectives in the Rohingya response: e.g. through the fielding of additional experienced AAP staff with community mobilisation experience that can engage with the different affected populations; systematic inclusion of Rohingya from the outset in decision-processes that will affect them; more open listening without preset agenda; more extensive collaboration with Rohingya-based organisations such as the Centre for Social Integrity and interaction with other emerging Rohingya community organisations; collective advocacy to donors to better fund approaches to turn a needs-based into a more people-centred response, through IOM's sectoral coordination roles and role as co-leadership position in the SEG.

R3: CwC WG: Change the heading to '*AAP-participation WG*' and bring in (as per the WG ToR,) a local co-chair for the WG, to strengthen the engagement with the host community.

4.4 Coordination

a. Description

Summarising, we can identify five phases of evolution of the coordination set-up.¹⁰⁵

Phase 1: Late 2013-late 2016: The development of a ‘National Strategy on Undocumented Myanmar Nationals’ (UMN) by the GoB leads to the creation of National and District Task Forces, chaired by the MoFA and District Commissioner respectively. The Strategy also mandates IOM to lead the coordination of humanitarian assistance to the UMN. The RRRC is under the Ministry of Disaster Management, has a mandate only for the registered refugees, and is very dependent on UNHCR funding. The unregistered refugees (an estimated 200,000+) and the host population, come under the District Commissioner’s Office and the upazila administrations.

Phase 2: Late 2016-summer 2017: At the time of a new influx of 74,000 Rohingya refugees in late 2016, IOM comes under criticism from other agencies over how it exercises that coordination mandate. IOM responds appropriately, deploying extra staff from HQ who consult and design a new coordination structure in March-April 2017. This becomes the foundation of the Inter-Sectoral Coordination Group (ISCG)¹⁰⁶. Responsibility for different sectors is now delegated to sector-lead agencies, and the new set-up is quickly tested, fairly successfully, during Cyclone Mora in May 2017. The new structure is adopted by the GoB and the UN/NGO/Donor Policy Group in Dhaka. IOM subsequently deploys a new Coordinator (in Cox’s Bazar since July 2017).

Phase 3: Late August 2017-end January 2018: The rapid influx of hundreds of thousands of new refugees, followed by tens of national and international aid agencies, massively challenges the existing coordination mechanism. New sectoral and thematic working groups came into being, the ISCG secretariat had to be expanded to bolster or take on additional functions. But more staff with extensive coordination experience was also required. In the first months after the crisis, OCHA seconded several such, including in the form of a Senior Coordinator as of end September 2017. In early November 2017, the strategic response coordination at Dhaka level was reorganised into the Senior Executive Group (SEG), consisting of the UN, donors, the Red Cross and Red Crescent Movement, and NGOs.¹⁰⁷ The SEG is co-chaired by the Resident Coordinator, UNHCR and IOM. At the same time, changes were also taking place on the government side, with the deployment of the Bangladesh military to support the large-scale immediate relief operation, the extension of the overall mandate to the RRRC¹⁰⁸, but also an expanded role for the Ministry of Disaster Management and Relief.

While the ISCG and SEG are supposed to be the pillars of the coordination for the aid agencies, additional platforms and spaces exist, particularly at Cox’s Bazar level, with the Head of Sub-Offices Group, the Inter-Sector Coordination Group, an INGO Forum and a Cox’s Bazar CSO and NGO Forum of local non-governmental organisations. Also on the GoB side there are different spaces for discussion and decision-making.

Phase 4: Late January 2018-late 2018: Out of recognition that this is a clear ‘refugee situation’, for which UNHCR has the central mandate and expertise, the Senior Coordinator position now gets filled by UNHCR, to lead the ISCG and the HoSOG in Cox’s Bazar. The incumbent reports directly to the SEG Co-chairs in Dhaka. The IOM coordinator becomes the ISCG Secretariat Manager, reporting to

¹⁰⁵ A good description of the coordination structure history can be found in Annex 4 (the ToR) of the Independent Review Report of the ISCG Secretariat (January 2018).

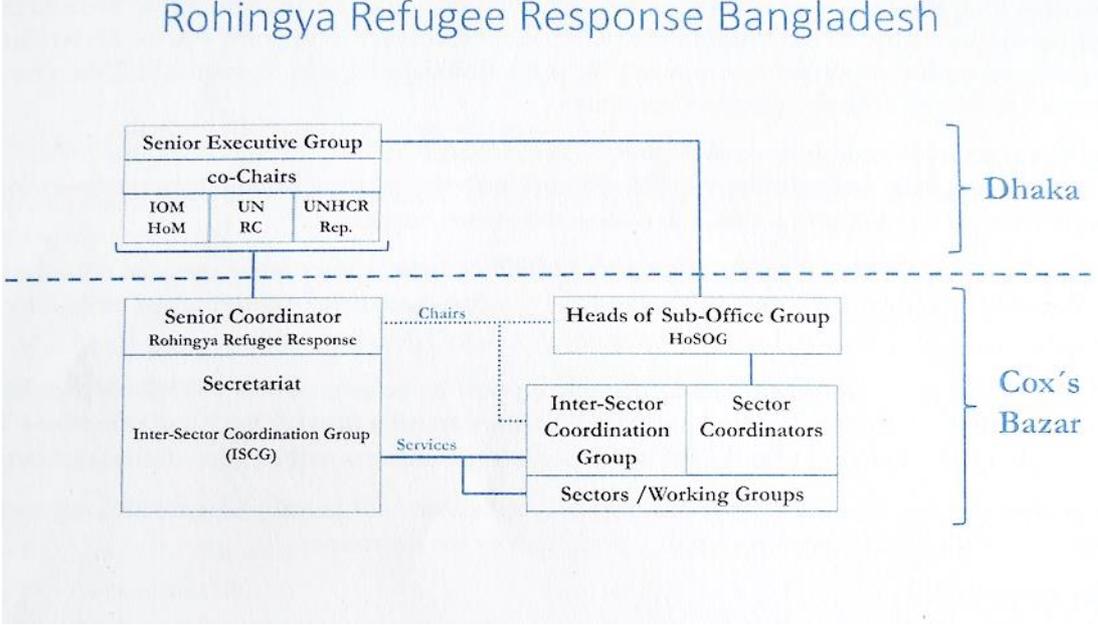
¹⁰⁶ Powerpoints from the period show both the use of the term ‘cluster’ and ‘sector’.

¹⁰⁷ Local/national NGOs were brought in belatedly, and after their active lobbying and campaigning.

¹⁰⁸ Which however only deployed one senior person to Cox’s Bazar.

the Senior Coordinator. The ISCG Secretariat is now also staffed with individuals from other UN agencies and NGOs, with notably OCHA staff phasing out and UNHCR staff coming in.

There have been continuing calls for further changes to the coordination set-up. The counter-argument has been that the emergency-within-an-emergency situation during the 2018 monsoon and cyclone season are not the right time for such.



Phase 5: Late 2018- : The idea is to have the coordination reviewed again, after the monsoon and cyclone season. Meanwhile, the significant development funds that the World Bank and Asian Development Bank are making available for Cox’s Bazar District, will expand and alter the coordination challenges. The views we heard favoured that the coordination around these funds be integrated in the existing structures, and not lead to a separate mechanism.

The risk is that it will be ‘light review’ that seeks to improve the past, but will lead to a continuation of the short-term, service delivery-oriented humanitarian coordination framework. For the future, which starts now, a coordination set up is needed that will support and enable a medium-term, social and economic recovery & development vision.¹⁰⁹

b. Observations and Reflections

There is general recognition that the coordination set-up has improved over the past several months. At the same time the overall structure is still seen as an “ambiguous space”, or “chunky”, with “all pieces of the puzzle” not yet neatly fitting.¹¹⁰

Following is the list of issues related to coordination. Some were more salient in the first months of the response, others are more so now.

The ‘model’: The existing coordination model is criticised for not corresponding to the existing coordination models for either refugee or non-refugee situations. The views on this vary, but fall largely into two categories:

¹⁰⁹ See later in the RTE report section, looking forward, for more on this.

¹¹⁰ Interview with senior UN officials in Dhaka.

- “An interesting experiment, but don’t let it ever happen again”.
- “An interesting alternative to how the UN can work together, adapted to this particular context. Perhaps this is a practical example of what we may see more of in the future.”¹¹¹

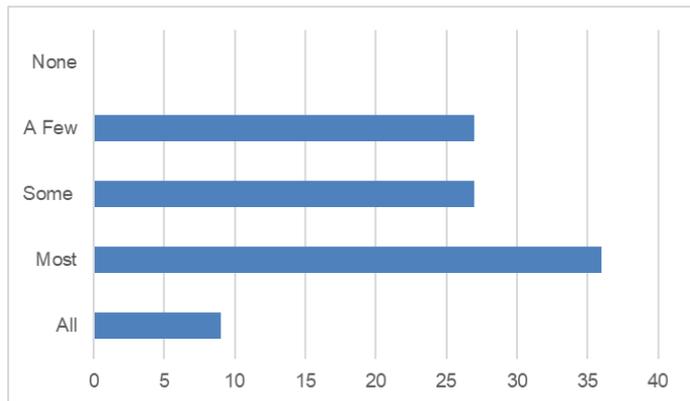
Discussions about models continue to take time and energy.

Branding: Some interviewees questioned why the ISCG has its own logo, while it is de facto a UN coordination structure.¹¹² They expressed concern that, if the overall coordination fails, the different logo will allow the UN to avoid responsibility.

Information management: The reviews of NPM and of the protection work, suggest that there are persistent weaknesses in the collective information management, resulting from different institutional (and perhaps individuals’) attitudes to sharing detailed data and specifics on the methodologies used to gather them.

Connectedness between sectors and working group: Around October 2017, there were nine sectors and two working groups.¹¹³ By March 2018, this has expanded to ten sectors and eight working groups.¹¹⁴ Critical views on this point at:

- The time investment required to contribute to or simply follow the discussions and decisions/guidance from so many groups. Smaller agencies in particular report not being able to devote so much staff time to this. Even larger ones complained about far too many meetings. Local CSOs the RTE team interviewed also criticise the large number of coordination meetings as overtly expensive;
- The disconnects between related sectors and topics: International health and nutrition specialists for example, already in February 2018, felt that ‘health’, ‘nutrition’ and ‘WASH’ should be integrated, as all are interrelated aspects of physical wellbeing.¹¹⁵ There are also connections to be made between CwC, AAP, PSEA and protection, which is rendered more difficult if each is treated as a topic in itself. As signalled in the earlier section on NPM, the sector-focus has created a problematic segregation between different factors that can influence ‘access’ to services. The earlier section on ‘protection’, suggests that it is still not fully mainstreamed into all service-oriented sectors. The section on CwC/AAP signals that a thematic Working Group cannot be made accountable for the overall uptake of its guidance on good practices. The chart shows the answers of 11 respondents to the statement: “Decisions and recommendations from thematic working groups get well integrated into sectoral planning



¹¹¹ Interview with senior UN official in Dhaka.

¹¹² Group interview with staff from several agencies present & two individual interviews with staff from other agencies.

¹¹³ IOM Sept.17-March 18 Appeal, p. 5.

¹¹⁴ JRP 2018, p. 35.

¹¹⁵ The Intersectoral Coordinators Group meeting, chaired by the Senior Coordinator, is supposed to ensure the linkages are made.

and practices.” The perceptions about uptake are balanced, and deeper inquiry would be needed to understand why some get taken up and others not. But uptake is not a given.

- Too many focal points: In practice, were new sites come into being e.g. Camp 4 and Camp 20 extensions, field-based site managers now need to communicate with or rely on the communications between too many different sectoral and thematic working group focal points, for essential services that ideally should be in place simultaneously (e.g. shelter, health, water, child-friendly spaces...). In at least one site visited, this did not work in practice, which shows failings at outcome level.¹¹⁶

Impartiality and competencies of sector leads: A few interlocutors questioned whether individuals that are staff of a certain agency, and whose office is located within their contracting agency, can be truly impartial/neutral sector- (and working groups) coordinators? This perception or concern about conflict of interest obviously applies also to the regular cluster set-up. The perception could be mitigated by having the offices of all sector-leads together in neutral premises. However, ultimately it will be the behaviour of the coordinators that shows their impartiality or lack thereof.

Several interlocutors, separately, mentioned that sector or working group coordinators did not all have the quality of experience, the coordination skills and interpersonal skills that gain respect for one’s leadership, that are required. This is probably applicable to coordinators deployed by different agencies, but the observations did include references to IOM coordinators.¹¹⁷ As our interlocutors did not want to be specific, even about the time when this may have occurred, the RTE cannot be so either.¹¹⁸

The implication however is for IOM to look at the person requirements: this requires a mix of technical expertise, inter-cultural competencies and the ability to manage inter-agency or multi-actor processes without strong formal authority or ‘hard power’. This would also be an attention area for a future review of the coordination set-up.

Connecting sectoral and geographical coordination: Possibly because sites continued to be developed, the geographical coordination seems to have lagged quite long behind the sectoral and thematic one. This is still somewhat surprising given the small geographical space in which this crisis plays out. In addition, the GoB had created a geographical structure that initially did not correspond to that emerging among the aid agencies. Another factor complicating geographical coordination has been the delays for NGOs to get FD7 approvals from the NGO Affairs Bureau for proposed activities. By the time these finally came through, another agency might already have set up the service infrastructure in the location.

By July 2018, a stronger geographical coordination seems to have emerged, with a government-appointed ‘Camp-in-Charge’, typically assisted by a UN agency and an NGO for the overall site management. Their work is much facilitated by the mapping provided by the NPM service. The question poses itself if, once the technical standards and guidance for this context are all agreed, whether a geographical coordination focus, still supported by thematic working groups, would become more important than a sectoral one? This would certainly benefit a stronger AAP/participation practice.

There is now also recognition that the operational coordination needs to be further ‘decentralised’, to greater proximity of the settlements/camps and the more local governmental authorities (Upazila

¹¹⁶ Interview with IOM colleague.

¹¹⁷ Who is responsible for the quality of a coordinator’s performance, where a person is paid for by IOM but has been seconded from one of its Stand-By Partners?

¹¹⁸ A senior IOM official, interviewed in HQ, made a strong point of the shortage of organisational investment in developing the necessary competencies for coordinators.

level). That may mean that the structure and roles of those operating out of Cox's Bazar may have to evolve.

Inclusiveness of the coordination: As recent as February 2018, Bangladeshi NGOs and CSOs were largely absent from the ISCG meetings. It took 5-6 months before international agencies acknowledged the issue, but then proceeded to invite a few Bangladeshi NGOs they knew and worked with, without process to ensure some form of 'representation'.¹¹⁹ Bangladeshi CSO understand that there can only be a limited number of them present in any given meeting: but want a proper process of selecting who represents them.

Bangladeshi CSOs have also been very clear about what makes the coordination environment so disabling for them: multitude of English accents, fast spoken; too much jargon and acronyms; people coming to talk but not to listen; too fast without time for reflection or consultation. They want an '*enabling coordination environment*'. Like many internationals, they have noticed the very competitive spirit among aid agencies, though the same occurs also among them. The INGO Forum has invited Bangladeshi NGOs and CSOs to join into one NGO platform. The 'Cox's Bazar CSO and NGO Forum' of local organisations has declined that invitation. It wants to work and closely coordinate with the international agencies, but also maintain its autonomy, as its member organisations have a different time perspective and hence view on their relationship with Cox's Bazar and its populations. They also want to maintain control over their own relationships with local and national authorities. With regard to INGOs, they see themselves as "*with you but not like you*".¹²⁰

Input from affected populations in decisions: From an accountability and 'participation revolution' perspective¹²¹, it is imperative that coordination meetings receive regular quantitative but also qualitative feedback and input from the affected populations, who are intended to benefit.

Authority of the ISCG coordination: In interviews with the evaluators, Bangladeshi NGOs point out that the only formal authority is that of Government. Interviewed internationals, even those who accept the validity of the ISCG coordination effort, observe that -certainly in the first few months after August 2017- there were several instances of key international agencies not following the agreements arrived at in the sectoral and thematic groups. Reportedly, there have been instances (or the perception thereof) that may even have been the case for agencies that employ the coordinator. As one senior UN figure put it "*when coordination is not right, everyone goes on their own*".

Eleven months into the response, confusion persists between the ISCG Sector Coordination and the Head of Sub-Offices Group (HoSo) in Cox's Bazar. One view holds that the HoSo is the representation in Cox's Bazar of the Humanitarian Coordination Team, whose national level equivalent is the SEG. In that view, sectors (and working groups) make technical recommendations for the HoSo to decide upon. From this perspective, sector coordinators need to be careful not to "*assume more authority than normal*".¹²² Others interviewed wondered why sectors and working groups would spend hours to reach a consensus that can then be overridden by the HoSo? In that perspective, the HoSo is seen as reintroducing an inter-agency dynamic that the ISCG had managed to overcome. That may not be the case given that the HoSo group, reportedly, includes all sector lead agencies, several of which are NGOs. That then raises the question what the value is of the Intersectoral Coordinators Group? There is obvious confusion between these three entities. And so

¹¹⁹ Interview with donor representative, February 2018.

¹²⁰ Conversations with the co-chairs of the Cox's Bazar CSO and NGO Forum.

¹²¹ The Core Humanitarian Standard and the Grand Bargain, both of which IOM publicly supports, are relevant references here.

¹²² Interview with UN agency staff member.

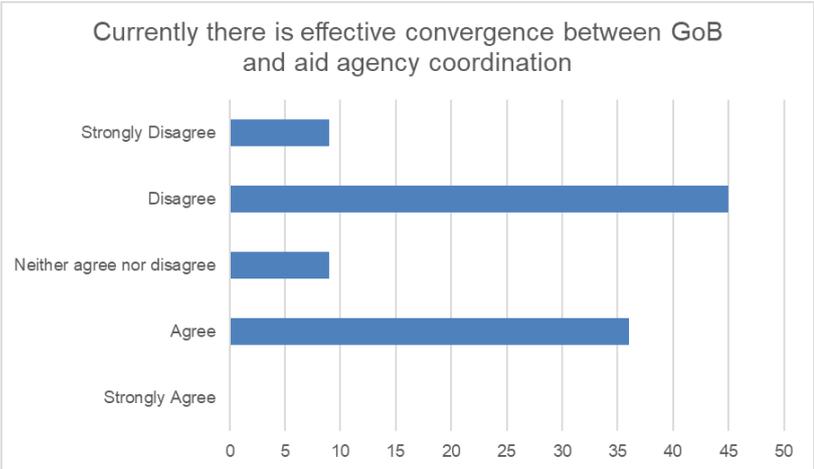
many discussion platforms must raise the question whether this significantly slows down decision making?

Team functioning of the Secretariat: The ISCG Secretariat is not always functioning as a cohesive team. This may partially be the natural occurrence in any setting where human beings have to work together. Reportedly however, individual agency loyalties may still override common purpose responsibilities. Occasionally, the difference in formal ‘rank’ (within the UN system) can also become a factor. Addressing this requires an engagement that goes beyond the formalities of job descriptions, places in an organigram and procedures, to the deeper dynamics of teams.¹²³

Interface between the ISCG and the SEG: One central actor in the ISCG expressed discomfort with the relationship between the ISCG and the SEG: the SEG was said to be too large with too many different interests, and too disconnected from the realities and the nuances in Cox’s Bazar. It was felt that SEG members should be much more tuned-in to the realities on the ground, listen more and dictate less.

Coherence between the aid agency and GoB coordination: In many though not all contexts, coordination spaces tend to be co-chaired between a government official and a senior UN one. With some exceptions, such as the MoH and the MoPHE, government officials for a long time were not present at the coordination meetings. A variety of reasons is invoked for this, among them:

- The deliberate policy of the GoB to keep a distance from a ‘refugee situation’ for which it did not want to become a major duty-bearer;¹²⁴
- The overall lead of the National Task Force with the Ministry of Foreign Affairs, which is not the operationally most appropriate governmental lead agency. Normally a major crisis response is coordinated by the Ministry of Disaster Management and Relief;
- The need for the overall GoB machinery to find its own coordination solution for an unprecedented situation;
- The absence of a corresponding GoB institution for certain issues;
- Lack of enough (senior) staff in Cox’s Bazar (e.g. the RRRC);
- International agency or agency staff insensitivity in dealing with GoB officials, expecting them to come to the international meeting spaces, or to respond to the international agencies’ time tables and priorities, rather than the other way around.



The graph shows variable perceptions among the 11 respondents to the survey on coordination convergence between the GoB and the aid community.

¹²³ In other words, should this be seen as important enough to address, then a new ‘technical’ revision along the lines of the Jan. 2018 Secretariat Review, would not be enough: approaches grounded in ‘team building’ and ‘team coaching’ will be needed as well.

¹²⁴ The GoB did not formally ‘endorse’ the Humanitarian Response Plan nor the Joint Response Plan. There were more prior consultations with Government before the JRP however, and the GoB acknowledges the JRP as the plan the international community will work with.

There remain significant sensitivities in the overall agency interactions with government. The GoB remains reluctant to formally acknowledge the situation as one of refugees, which have refugee rights. Conversations about long-term planning and certainly ‘integration’ remain taboo, at least at formal level. As a result, internationals have criticised the internationally dominated response (and the UN leading it) as one that treats the biggest refugee crisis in the world as a “*natural disaster*” or a “*logistics challenge*”. The UN Secretary General, the President of the ICRC, and the Director-General of UNHCR speaking explicitly about ‘refugees’ is significant. Interestingly, between February and July 2018, there has been a shift among a number of Bangladeshi CSOs who some months ago did not want to speak publicly against their government’s policy, yet now do talk more openly about refugees and refugee rights, with even a social media campaign on World Refugee Day in 2018.

Key Informants who have been involved with the Cox’s Bazar situation for a year or longer, see however significant positive changes, from a GoB that was largely disengaged prior to August 2017, to one that is increasingly present and engaging with a growing number of ministries and other governmental entities. They see this as a vindication of the quiet and gradual approach of influencing the GoB at a pace it could tolerate, avoiding a confrontation that could again have led to a severe reduction of access.

c. Conclusions

A tolerant perspective: Those with a tolerant view of coordination challenges will see the ups and downs of the coordination story in the past year with leniency: “*Any coordination system in the world takes time to develop and mature; key actors and stakeholders need to mature with it.*”¹²⁵ An appreciative perspective will also underscore that the coordination today is better than it was three months ago, when it was already better than six months ago.

A critical perspective: Others on the other hand, especially NGOs but also donors, remain critical of what was widely perceived as excessive competition, especially among UN agencies. As one INGO aid worker, with extensive comparative experience put it: “*the Rohingya crisis response has been one of the most competitive environments I have ever seen.*”¹²⁶ There is particular sensitivity about the perceived absence of accountability because of the leadership controversy. As one UN official put it to a donor representative: “*where there is no clear leadership, there cannot be accountability!*”¹²⁷ The argument can be made that the ultimate responsibility, and accountability is a collective one, of the Resident Coordinator and the two Co-chairs of UNHCR and IOM. Collective responsibility is acceptable, when it is indeed acknowledged and acted upon.

Form over function: The point must be made that the conversations around coordination seem to turn far more around ‘models’, ‘lead agency’, and ‘reputational risk’ than about its practical purposes: this should be to meet people’s needs, protect their fundamental rights, strengthen their capacities and resilience, as fast, comprehensively, equitable and cost-effectively as possible. Structures of ‘coordination’ do not automatically generate ‘collaborative’ attitudes. More focus is needed on behaviours around problem-solving, than formalistic models. An ICVA NGO support mission in July 2018 called for an inclusive process to design a coordination structure that will “ensure a principled, accountable and effective response now and in the future.”¹²⁸

Coordination competencies: Leading the coordination of a sector, working group or totality of activities in a particular site, with a diversity of agencies and personalities, over which one has no

¹²⁵ Interview with senior UN official.

¹²⁶ INGO senior staff member interviewed in February 2018.

¹²⁷ Interview with donor representative in February 2018, but the point was reiterated by a senior UN official to the RTE team during an interview in the summer of 2018.

¹²⁸ ICVA NGO Support Mission July 2016: Key recommendations: 2.

formal authority, requires solid technical or thematic expertise, but also many soft skills. The quality of sector- and working group coordinators in the overall response has been variable, including among those deployed by IOM.

The late 2018 Coordination Structure Review

The post-monsoon review of the coordination structure is now being activated. The ToR correspond to the recommendations of the RTE (draft 1), as following excerpts show.

The objective of the review is to make recommendations that aim toward a coordination approach that will enable the different national and international stakeholders in the Bangladesh refugee operation to work together more effectively in pursuit of common goals in the areas of protection, humanitarian assistance, development, resilience, and support to the host communities. The recommendations following the review exercise should result in:

- *Clarity of accountability for the refugee response;*
- *Maximum efficiency and effectiveness in the provision of assistance and protection, and in ultimately finding solutions for refugees;*
- *Optimal engagement toward the medium-term nature of the response, including in risk management and development activities that address the negative impacts of the crisis and appropriately covers both the refugee and host communities.*

The main review mission will take place in October 2018. Its planned composition includes UNHCR and IOM, as well as one UNDP and one INGO member. A preliminary lessons-learned workshop took place in Cox's Bazar on 12 September, with presence of the UNHCR Director of Asia and Pacific Bureau. Though the stated objective is "to bring together humanitarian actors in Cox's Bazar", the participation is limited to SEG Co-chairs, ISCG, Sector coordinators and Heads of Sub-office Group. Insufficient inclusion of INGOs and Bangladeshi and Rohingya CSOs, may render the review vulnerable to criticism. At least one sector coordinator also questioned the ability of UNHCR and IOM to review the effectiveness of a structure they have been leading. It is not clear if and how the GoB will be involved in the review.

Recommendations on Coordination

R1: CO, SEG: *The coordination review:* Continue to influence the main coordination review exercise to ensure that it is inclusive, and results in more (time and cost) efficient, effective and accountable inter-agency coordination, that links shorter-term relief with medium-term transition and recovery perspectives, and actively draws on input from the different affected populations. Effectiveness at outcome level is more important than models and agency leadership.

R2: HQ: *Coordinator competencies:* Ensure that IOM-deployed sector and working group coordinators have the experience and personal and professional competencies to foster collaborative practices among diverse actors with different views.

V. Focus Area 2: Looking Forward (autumn 2018-end 2021)

a. Observations and reflections

A historical foundation: Prior to the August 2017 influx, IOM already had several programme activities that benefitted not only Myanmar refugees but also members of the Cox's Bazar host population. Examples mentioned also by non-IOM (international) interviewees are the health facility in Teknaf Upazila, and the increase of water supply to that Upazila through dams in riverbeds. Of a very different nature is the 'digital island' initiative, to increase internet connectivity in Cox's Bazar and enable more e-commerce. IOM has long-standing and close relationships with the Cox's Bazar District administration, which is another enabling factor.

Emergency response takes centre-stage and is prolonged: Since the August 2017 refugee crisis, understandably attention has been heavily devoted to the emergency response. This continues because of the 'emergency-within-an-emergency' of the monsoon and cyclone season. The extension of the JRP, from end December 2018 to end March 2019, is likely to contribute to a continuation of the emergency response mode.

Not yet a clear medium-term strategy: Though there has been conversation among senior IOM managers, and there is a Transition and Recovery Unit in Cox's Bazar, there is not -as yet- a 'stabilisation' or 'transition and recovery' strategy or any coordinated analysis and planning to that effect with other agencies.

Political sensitivities over of medium-term planning: The donors interviewed all signalled they saw this as a longer-term situation and several had mid-term funding (3 years) committed. Three points came up repeatedly in their conversations: the current cost of the response is unsustainably high; one contributing factor to the high cost is the crowdedness of the mega-camp of Kutapalong-Bathakali which can partially be addressed by decongesting. However, medium-term thinking and planning is currently not politically possible for the Government. This is expected to continue, not only till the elections have taken place, but till the results are 'accepted'. Beyond that there is hope, but no certainty, that the Government will engage in medium-term planning.

Emerging dilemma: The aid community may be facing a major dilemma in the next few months: If there is no decongestion of the mega-camp, major costly investments will be required next year as well, to continue to build what is effectively the basic infrastructure of a medium-sized city. If some decongestion is possible (which will require the GoB to allocate more land), then some infrastructure investment has to be directed to another site.

Opportunity? The announcement by the World Bank and the Asian Development Bank, in July 2018, that they are making available US \$ 480 million for investment in Cox's Bazar district, creates an opportunity for medium-term analysis and planning to be initiated. Looking at how Cox's Bazar district fits within the Bangladesh UNDAF might also be relevant.

b. Scenario thinking

Understandably, many actors in Cox's Bazar, faced with ongoing life-saving and immediate protection needs and funding constraints, remain focused on the next 3-9 months (the next monsoon season in 2019). To complement that, the RTE team has asked more medium-term questions:

- What are possible scenarios for the next 3-4 years?
- What actors may have greatest influence over what scenario materialises, and what factors?
- What can we do (collectively) to ensure that the 'most desirable' or 'least bad' scenario materialises?

The repatriation scenario

Even though agreements have been signed with the Myanmar authorities, large-scale voluntary repatriation, as it took place between 1994-1997, seems highly unlikely.¹²⁹ In Rakhine State, Rohingya villages have been raised to the ground, and their names are changed. Rohingya now in Bangladesh suspect that the GoM would resettle any returnees in dispersed, remote and inhospitable locations. Tens of thousands of Rohingya, displaced after the 2012 violence, also remain in virtual ‘internment camps’ in central Rakhine State. In light of the recent report from the UN fact finding mission¹³⁰ and the call for ICC action it is unlikely that repatriation will go ahead any time soon. International pressure, if not supported by the regional super-powers, is unlikely to sway the authorities in Myanmar, and so far has been used to fuel the nationalist propaganda that enabled the large-scale violence against Rohingya in the first place.¹³¹

The resettlement to a third country scenario

With the current anti-refugee/immigrant climate in Western countries (including Australia), and the obvious reluctance of wealthy Muslim countries to take in any significant number of refugees, and the fear of radicalised individuals and groups, this scenario seems equally improbable. Even if a small number might get resettled, this will be insignificant for a total of some 900,000.

The protracted stay in Bangladesh scenario

Even though this is not the wish of the GoB, and probably not of part of its population, by default it seems the Myanmar refugees will be there for several years to come.¹³² Within that overall situation, very different scenarios could evolve, as visualised on the following page.

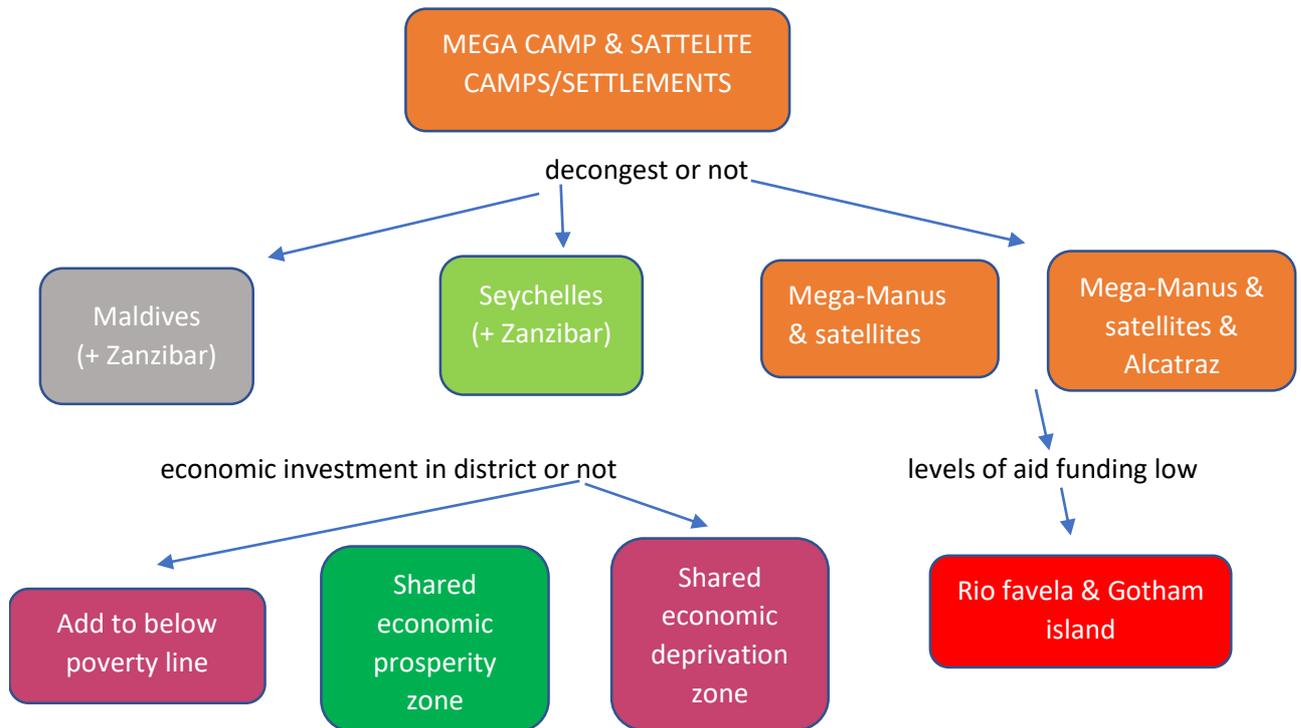
¹²⁹ The RTE team takes note of the alleged agreement between the Governments of Bangladesh and Myanmar, announced in late October 2018, to start repatriation of several thousand Rohingya before the end of 2018. The UN has not been involved in this and asserts that the conditions for safe repatriation to Rakhine State do not exist.

¹³⁰ <https://news.un.org/en/story/2018/08/1017802>.

¹³¹ See Wade, F. 2017 Myanmar’s Enemy Within. London, Zed Books.

¹³² This is also the view of C. Wake & B. Yu 2018: The Rohingya Crisis. Making the transition from emergency to longer-term development. London, ODI, HPG Policy Brief 71.

COX'S BAZAR SCENARIO THINKING



The scenarios single out three determining factors: decongestion notably of the mega-camp of Kutupalong-Balukali; levels of international aid funding and economic investment in Cox's Bazar district or not. Sub-scenarios are given names for ease of reference. Other names can be chosen. The centrality of the decongestion factor has been brought up repeatedly, including by donors, who see the mega-camp as far too costly.

- **No decongestion:** A key issue is the willingness and ability of the GoB to make more land available – which may be to the detriment of the host population. No decongestion would result in two options: 'mega-Manus' and satellite settlements with or without an additional 'Alcatraz'. This is the 'internment' situation. Manus refers to the internment camp for irregular migrants and refugees created by the Government of Australia on the island of the same name, but now on a vast scale (some 600,000 people) and 'Alcatraz' to the prison-centre on an island off the shore of San Francisco. The 'Alcatraz' version could arise if some 100,000 Rohingya were moved to the new island of Bhashan Char. There are Bangladeshi who support the 'internment' option, of a 'camp' with walls and a tight security cordon around it, as we heard from an elected local level official in Ukha. This would be no different from the current 'camps' in central Rakhine State. A discourse with many references to 'camps' contributes to this scenario. Any significant economic investment in Cox's Bazar district, would not spread to include the Myanmar refugees. This scenario will require ongoing, expensive, infrastructure works to create what in effect will be a new city in Ukha Upazila.
- **No decongestion and low levels of relief funding:** The situation is not just one of totally restricted movement, but now of deeply impoverished mega-slums, where social norms have

totally broken down, and large parts of which are, ‘favela’ or ‘Gotham city’, controlled by violent gangs. Parts of the camps and settlements have become too dangerous for aid workers to go to, even with police or army protection. The ‘large slum’ argument may not weigh in heavily in Bangladesh where there are others, including in Dhaka. The security argument could be more effective – a point on which Bangladeshis are best placed to advise.

- ***Decongestion of the mega-camp in Cox’s Bazar district:*** The GoB allows the breakup of at least the mega-camp. This leads to a series of ‘Seychelles’ style islands of camps and settlements, not too far from each other within what remains a small part of Bangladesh. In principle, this should enable more mixing of Rohingya and host-populations while still allowing the Rohingya to remain in touch and protect a shared identity and shared demands for their future.
- ***Decongestion of the mega-camp across the national territory of Bangladesh:*** The GoB allows the breakup of at least the mega-camp but disperses the Myanmar refugees in small groups across the national territory. This reduces the pressure on Cox’s Bazar district but breaks up the Rohingya as a shared identity group, puts many of them in an absolute minority position, surrounded by Bangla speakers they struggle to communicate with. A very unlikely scenario, as it would be interpreted that the Rohingya will indeed eventually settle in Bangladesh.
- ***Decongestion with significant economic investment in the area or not:*** This only seems a realistic option for the ‘Seychelles’ scenario i.e. investment within Cox’s Bazar district. If there is significant investment that brings new and better economic opportunities for most residents in the district (including perhaps those now on Bhashan Char island), then the outcome might be a shared economic prosperity zone. If there is no significant economic investment, or not enough, or it is not sufficiently well managed, then the situation might be one of an additional 600-700,000 people in a shared economic deprivation zone.

The main decision-maker for the decongestion factor is the Government of Bangladesh. For the relief aid, it is the humanitarian budget-holders of the bilateral and multilateral back-donors. For the economic investment factor, the World Bank and regional banks, the development budget holders of the back-donors, but also the GoB, who will be the main contractual party and decide how the money is spend.

There may be other scenarios possible. But based on these speculations, the most desirable one would be decongestion with effective economic investment the benefits of which are shared. If that is the case, what can different actors do, collectively or separately but with a common purpose, to bring that scenario into being?

A factor not taken into account here as a potentially major influence, is sentiment towards the refugees among the host communities.

c. Host Community: Observations and reflections

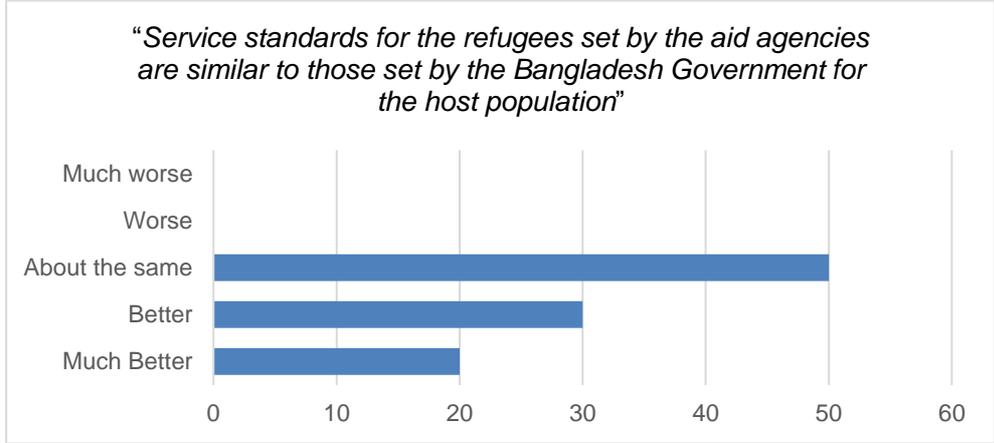
New minority: The ‘host community’ in Ukhia and Teknaf has now become a minority in their own areas. Many continue to show great empathy and hospitality¹³³, others draw attention to the negative impacts, some are deliberately stirring up anti-Rohingya sentiment.

Focus on negative impacts: There is understanding, in the aid community, of the multiple negative impacts of another 670,000 refugees, on the environment, on market prices, traffic congestion and

¹³³ The RTE team heard several examples of this, and also interviewed a host family in the mega-camp whose house is now surrounded by thousands of refugee shelters, on what used to be their agricultural and horticultural land.

accidents etc.¹³⁴ The Cox’s Bazar CSO and NGO Forum (CCNF) has actively campaigned for more attention to and quality engagement with the host communities, and for the mitigation, among other issues, of the environmental impacts.¹³⁵ There is some recognition, but comparably less understanding of how members of the host community have also benefitted from the business opportunities created, and who? Noteworthy in this regard is that many host community respondents to a relevant survey indicated their preference was to start a small business, and that their greatest support need is for capital.¹³⁶

Standards for refugees and host populations: Better standards for refugees than for the host population are a known recipe for tensions and conflict. The 11 who responded to the survey question “Service standards for the refugees set by the aid agencies are similar to those set by the Bangladesh Government for the host population” perceived that to be currently the case. That signals an emerging risk situation.



Mandatory share: To our knowledge, so far the GoB has not established a mandatory percentage of international aid mobilised for the crisis, that would have to benefit the host communities – as the Government of Jordan has done for example. The JRP 2018 also does not set a particular percentage. Reportedly, there is a common understanding this would be about 25%.¹³⁷

Communicating with host communities: The knowledge among the host communities of the various projects already being done for their benefit, at the moment seems very limited. The aid community needs to communicate better what it is doing and where, to avoid a persistent perception that it is totally neglecting the host community.¹³⁸

¹³⁴ Attention to the host communities started a few months into the response e.g. in Dec. 2017 UNDP and UN Women brought out two short notes with preliminary observations from a rapid environmental assessment and a social impact assessment. In January 2018, the ACAPS NPM Analysis Hub produced a ‘Host Communities Review’ summarising the situation and needs of host communities. The JRP 2018 equally devotes attention to them.

¹³⁵ A ‘public dialogue’ was organised in Cox’s Bazar town on 31 March 2018, where UNHCR, IOM and the ISCG Senior Coordinator were panel speakers next to high level GoB officials. COAST-Trust and the Cox’s Bazar CSO-NGO Forum (CCNF) in July 2018 also published ‘Crisis within a Crisis. A study on impact of Rohingya influx on the host community.’ The CCNF has also taken other opportunities, such as during the visit of the UN SG and the President of the World Bank Group, to stress this point.

¹³⁶ Save the Children, BRAC, World Vision, WFP and UNHCR Jan. 2018: Self-Reliance assessment (powerpoint) This of course would need to be tied with equipment, skill development, market linkages etc.

¹³⁷ Interviews and confirming comment on draft 1 of this report.

¹³⁸ ISCG documents, such as the May 2018 “Response Highlights” on support to Bangladesh host communities and institutions, do not disseminate widely, and hence do not affect perceptions. The ToR of the CwC WG state

Broader Relationship and Dialogues with the Host Communities

The delivery of basic services to host or mixed communities will happen in close cooperation and dialogue between IOM and the various components of the District Administration, also at its lower levels. While respecting and supporting the role of government, IOM also needs to engage more broadly with sections of local society, as this is part of the broader political economy and governance relationship.

There are in any case the varying sentiments among the host community, and its opinion-shapers, about the Rohingya refugees. One view heard, from an elected official at the Union Panisad level, is that the refugees should be kept in closed camps, fenced in and with a security cordon around. That person also reiterated a narrative also well-known from elsewhere in the world: that the refugees are the cause of impoverishment and the source of rising crime. Such situation requires facilitators or other participants who can foster deeper reflection with questions such as: *Why then was the District already in comparably worse socio-economic shape before the arrival of large refugee numbers? Or 'Are those involved in the drug, arms and people trafficking in the District then all refugees only?'*

The same person also queried why the aid agencies were not investing in widening the roads they are now congesting? A useful point to make in such situation is that expropriation of private property along the road, and compensation, are the responsibility of government.

These are dialogues and debates that need to take place between Bangladeshi citizens. A number of local CSOs have been actively engaging the host community to protect and promote a perception of the refugees that they are not there of their own volition. They also have experience with community radio (the first community radio in Bangladesh originated in Cox's Bazar, which can be a valuable channel here. They have also been training a number of local reporters and journalists on 'responsible journalism'.

But staff members, certainly national staff members involved in outreach, should have some ability to at least invite deeper reflection by asking good questions.

What lens on host communities? In February 2018, discussions took place to start a new working group on host communities. This did not materialise as those invited could not agree on the purpose for such group, and the added value given that "*host community programming is coordinated under the sectors and respective technical working groups.*"¹³⁹ The RTE team considers this a tactical and potentially strategic mistake: Considering the 'host community' only through the lens of material needs is a dangerously limiting perspective. There is an -untested and possibly mistaken- assumption that it is largely homogeneous. Cox's Bazar district has a complex social, economic and political history, that is very much part of living memory for its inhabitants.¹⁴⁰ Those aspects of the operating environment need to be understood. A pure 'needs' perspective will also fail to catch the broader economic dynamics – and developmental opportunities- for the district. The result would be disconnected small projects – Quick Impact or not- that address basic services needs in different sites, but do not catalyse any structural changes that could provide economic opportunities at scale. Local

that "In line with the Grand Bargain, the WG will work closely with Bangladeshi civil societies by proactively reaching out to representatives of the host community (...); also by identifying a local co-chair for the WG, by liaising with the host community and local government bodies."

¹³⁹ Communication, ISCG focal point host communities.

¹⁴⁰ Which includes not always smooth relationships between its Muslim majority and now Hindu and Buddhist minorities.

CSOs in Cox’s Bazar have spent years campaigning for a railroad link to the town, work on which reportedly is now starting. They are also considering the creation of one or more technical colleges. Hopefully the involvement of the WB and ADB will catalyse a change from thinking in terms of ‘projects’ to ‘*how we do turn the presence of an additional 900,000 labourers and consumers into an economic opportunity?*’

Refugee-host community relations: A multi-faceted issue that the RTE team could not explore adequately within the time constraints. As mentioned, while many host community members have suffered negative impacts, not all blame the refugees for this. Plenty of anecdotes can be heard of local families still hosting refugees in their home or allowing them to occupy land without rent.¹⁴¹ In the refugee sites, Bangladeshi aid agency staff and locally recruited Rohingya have also been reported to developed closer understanding and relations. There is however also animosity, deliberately incited or not, and some local Bangladeshi CSOs have stepped up to engage their fellow citizens, pointing out that the refugees are not there of their own choice. Rohingya refugees interviewed expressed concern over the burden they impose and demanded an opportunity to be economically productive, so they can contribute. There is a rich experience from the pre-August 2017 years, that must be tapped into.

d. Stabilisation, Transition and Recovery, Humanitarian-Development Nexus

Terminology: The choice of words, in IOM internal and external communications, but also in inter-agency communications, needs to be considered. For donors, the ‘humanitarian-development nexus’ concept, which relates to Commitment 10 of the Grand Bargain, may be attractive. It also resonates well with the World Bank and Asian Development Bank engagement. IOM will need to see what works best in communications with national and local GoB authorities, host populations and refugees. Internally, institutional dynamics involving the Transition and Recovery Division (at HQ and Cox’s Bazar level) should be enabling.

IOM comparative advantage: IOM is very well placed to be a leading agency in recovery and developmental planning and programming. This is also recognised by donors the RTE team spoke with. It has some relevant programming history, including training for Para-Development Committees in Leda,¹⁴² has good relationships with the District Administration also at lower levels, has in the past done some capacity-building for local NGOs¹⁴³ and also around the Rohingya refugee crisis has had contacts with local Bangladeshi CSOs,¹⁴⁴ and has relevant in-house expertise such as in disaster risk reduction, and community stabilisation. Irregular migration and counter-trafficking are also an important component of its national programme in Bangladesh. Cox’s Bazar has a history of smuggling (particularly drugs, to a lesser degree arms and people), and we must anticipate that Rohingya will seek to get to Malaysia, Indonesia and other places by boat from Cox’s Bazar as they did previously from Rakhine State.

Localisation: Commitment 2 of the 2016 Grand Bargain is to ‘reinforce’ rather than ‘replace’ local and national actors, and to channel more (and better quality) funding to them. The promise to build on

¹⁴¹ Others do ask rent for land and/or a house. The report of the Xchange Foundation: “The Rohingya amongst us”. Bangladeshi perspectives on the Rohingya crisis survey.” August 2018 shows clearly the mixed feelings.

¹⁴² IOM Rohingya Refugee Crisis Response, External update 19-25 January 2018.

¹⁴³ The RTE team heard two conflicting perspective on this, from individuals with a longer-term presence: one saw this as very positive, the other as having been poorly designed and with limited impact. The broader issue here, beyond the remit of this RTE, is how to effectively support organisational development, of individual organisations, but also sectors and networks. This is a specialist field in itself, better known and access in development than in humanitarian circles.

¹⁴⁴ Who express appreciation for this, but also note the at times very slow responsiveness of IOM to a communication request and delays in payments.

‘existing capacities’ is much older however.¹⁴⁵ The influence of the humanitarian financing gap¹⁴⁶ on the Grand Bargain quite unfortunately suggests that ‘localisation’ should only be pursued because local/national actors are cheaper. A healthier way of considering this would be to see strengthened local and national, governmental and non-governmental (and eco-system) capacities as a strategic objective. Planning then also takes place informed by the question: *What legacy of strengthened local/national capacities do we want to leave behind here?* Some donors, such as ECHO or the Swiss Solidarity Foundation, are already intentionally encouraging international agencies directly implementing their Rohingya response projects, to advance on localisation.

The text box on the next page gives a more balanced perspective on local Bangladeshi CSOs, that must be part of the introductory briefing of further international staff, new to this environment.

Rohingya community development: For the Rohingya these are not ‘local’. The Rohingya community for the past three decades has not been allowed to develop. Even within the confines of the current policy, the current situation is an opportunity to give many of them that chance, individually and as a community. That can also be framed as investments to increase the likelihood of a successful repatriation. This could include active engagement of Rohingya youth around social norms and values and positive social roles, expanding listening and discussion groups around radio programmes and social media to encourage critical thinking, briefing them about Bangladeshi and international legal frameworks that are relevant for them, explaining to a broader section of Rohingya how the international aid community works, supporting them in conversations about what leadership they need, but also more widely by recording their oral history, perhaps even taking the opportunity to create a script for the Rohingya language.¹⁴⁷ This is all the more relevant as the Rohingya are not only vulnerable legally and physically, but also as a ‘community’.

¹⁴⁵ It has been a constantly mentioned commitment in the Red Cross and INGO Code of Conduct, the Sphere Handbook, the Humanitarian Accountability, now the Common Humanitarian Standard etc.

¹⁴⁶ UN 2016: Too Important to Fail – Addressing the humanitarian financing gap. Report of the High-Level Panel on Humanitarian Financing to the Secretary-General, New York.

¹⁴⁷ Somali was not written until the early 1920s and did not spread widely as a written language until the adoption of the Latin alphabet in 1972.

Attitudes to Bangladeshi and Local CSOs

Bangladesh has a big and diverse ‘civil society’ of NGOs. As elsewhere, there are variations in competencies, capacities and integrity. There are also internal tensions, sometimes resulting from interpersonal differences, sometimes from very different visions for society.

As elsewhere, the Rohingya response too has brought its share of internationals with a generalised negative perception of local and national NGOs and a more or less explicit attitude of superiority. This is badly received. The fact that big national but particularly the international agencies have hired away sometimes significant numbers of the best staff of these NGOs, without notice, created salary inflation and drove up prices for meeting and conference facilities, rental cars, office space etc. is largely ignored.

An introductory briefing should point out that:

- Bangladesh may still be poor but has made enormous strides in the past 30 years. Non-governmental organisations have been a major part of that. There is justified pride and confidence because of that;
- There are Bangladeshi organisations with annual budgets larger than those of mid-sized INGOs. There is tight oversight regulation by Government;
- International donors have directly funded several Bangladeshi NGOs, often for development work, or have put money in a pooled fund, managed by a Bangladeshi non-governmental organisation;
- Some Bangladeshi CSOs are CHS-certified, and have measures of transparency to various stakeholders beyond those of some INGOs;
- Bangladeshi CSOs are used to working closely with local and national government;
- Bangladeshi CSOs can learn from international agencies, especially about approaches that are particular to a large-scale refugee situation, which has not been part of their experience or prior ‘capacity building’. But there also has to be recognition that they have been innovative and have relevant experiences. There have been instances where they have rejected offers of ‘training’, not because they believe they have nothing to learn, but because they assessed the offer as contextually inappropriate.

As for the Cox’s Bazar local CSOs: Some interlocutors seem to dismiss them in general as ‘politicised’ (which may mean: perceived as linked to a political party, or with a CSO director who has political ambitions etc.). This may or may not be the case. But distinction is required between CSOs that build political networks and connections in order to further their cause, and those who are under the influence of political interests.

The first community radios in Bangladesh originated in Cox’s Bazar. Local CSOs have been campaigning nationally to connect the district to the national rail network, reportedly successfully. They are also envisaging now the creation of several technical colleges in the district, as another contribution to more structural economic investment.

The Cox’s Bazar CCNF over the past eleven months has campaigned on successive issues: First, the right for local CSOs to be ‘at the table’ in the spaces in Cox and Dhaka where the Rohingya crisis but also Cox’s Bazar’s future, are being discussed; secondly, about the need for greater engagement with and recovery support for the host communities, sections of which have been heavily impacted; third, (particularly around World Refugee Day 2018) for recognition of the Rohingya as unwilling ‘refugees’ who have rights and should not be blamed for causing such negative impacts. Some international actors have only noticed one or the other topics of these successive campaigns, which gives a wrong impression. These CSOs, with long experience and strong connections in Cox’s Bazar can be approached as potential allies to try and make the more desirable scenario of decongestion and shared development, materialise.

d. Conclusions

Medium-term planning is urgently needed but politically sensitive: The probability that most Rohingya refugees will return to Myanmar in the foreseeable future is extremely low. Medium-term planning is urgently needed, not in the least to determine where further infrastructural investments have to be made before the 2019 monsoon season, but officially not accepted by the GoB.

Key scenario determinants: Key determinant factors identified, that- in various combinations- will shape the medium-term scenario are: decongestion or not, particularly of the mega-camp; levels of aid funding sustained or declining; significant economic investment in Cox's Bazar district or not. The announcement by the World Bank and the Asian Development Bank of significant development funds for the district creates an opportunity to pursue the least bad scenario of decongestion with inclusive economic development. Towards donors, some of which have already lined up 3-year funding, this can be argued in terms of the humanitarian-development nexus.

More substantive engagement with host community needed: Notwithstanding significant negative environmental and economic impacts on the poorer sections of the host community, empathy for the Myanmar refugees remains fairly high. However, the host community currently does not get the information about the projects the aid community is already implementing for their benefit, and their ability to participate in what have to be tripartite discussions also with the local authorities, is too limited. CSOs, local to Cox's Bazar rather than from other parts of Bangladesh, are well placed to be strategic players and allies in this regard.

Localisation as strategic objective: Localisation (and a participation revolution) is one of the Grand Bargain commitments IOM has endorsed. Conversations with aid agencies in the Rohingya response show that this tends to become an objective when the funding for international organisations declines. 'Reinforcing' local capacities (also from at risk and affected populations) is not yet seen as a strategic objective. To that effect, generalising prejudices about local CSOs need to be kept in check. Creative thinking about socio-economic development must be mobilised as fragmented projects rarely have a multiplier or cumulative impact effect.

Rohingya community development: The improved security of the Rohingya refugees creates an opportunity for this community to develop itself. This has equal value for successful repatriation as successful prolonged stay or integration in Bangladesh. This is currently not happening in a deliberate manner.

Recommendations on the Medium-Term Strategy

R1: CO, SEG: Use informal channels of communication with GoB officials to discuss the approaching investment dilemma, the implications of likely decline in relief aid and the opportunities created by the promised development funding.

R2: CO, RO, HQ TRD: Start shaping IOM's transition, recovery and development strategy, with active attention to projects and investments with economic multiplier effect, not just basic service delivery and disaster risk mitigation projects. Include the reinforcement of local capacities to the point where they can take over as a strategic objective.

R3: Cox's Bazar emergency programme, sub-office, CO: Encourage the maturing of Rohingya community-based organisation, and open up space for their substantive participation, together with but also beyond 'elected committees'.

R4: HQ, CO and Cox's Bazar sub-office: The Transition and Recovery Unit in Cox's Bazar, currently a bit in the shadow of the emergency response, needs to evolve to an equal level component, in terms of seniority and calibre of staff, and strategic and operational management attention. It needs to have the capacity to broaden and deepen the relational network with local authorities in the district, but also with Cox's Bazar local CSOs and other influential social, economic and political actors in the district. These will be important channels for two-way communication, and citizen participation.

VI. Appreciation

Strong appreciation: That no major morbidity and mortality has occurred is a major, collective achievement. So too is the creation of settlements, however imperfect still, for hundreds of thousands of people, in unsuitable terrain with no pre-existing infrastructure. Across informed sources interviewed, there is recognition that IOM has been a major contributor in all this. Though other agencies have also played critical roles (e.g. the Bangladesh army, ACF, MSF, Save the Children...), IOM's ability to scale up, fast, in multiple sectors, and to deliver at scale, has been one of the major pillars of this response. A strong L3 mobilisation was entirely appropriate for this crisis. While there are weaknesses and shortcomings, and adjustments now required, all other agencies have had or also would have had the same.

In addition, IOM deserves recognition for its pre-August crisis role, which delivered services to unregistered people from Myanmar, helped to open up access and space for other agencies, responded constructively to criticism of how it handled the coordination by creating the ISCG, and initiated the NPM service. IOM's constructive use of its relationship with the GoB merits recognition.

Worth mentioning are also the expressions of appreciation, from others, of IOM's comparative openness to critical comment and conversations.

As per the choices made, this RTE did not focus on the many areas of service delivery in IOM's response. There is no doubt that IOM's was highly relevant and delivered at scale. The RTE team did pick up areas of appreciation (e.g. for IOM's overall role in health, the quality of the Leda clinic, the restoration of water in Teknaf by creating dams in the riverbeds, the bamboo treatment plant to extend the lifespan of shelter materials etc.) and of concern: lack of oversight of implementing partners which eventually forced IOM to take back control (site management), significant delays with the collective pipeline on fuel etc.)

The collective preparedness for the monsoon and cyclone season appears to have come late. As late as July, relocations from hazardous areas are still fully ongoing. Fortunately, the 2018 monsoon season started late and not with heavy rainfall

Relevance, coverage and effectiveness: The NPM, protection and CwC/AAP areas of work are all highly relevant.

The NPM has extensive coverage, produces regular updates of relevant data, and contributes to coordination effectiveness e.g. through the production of site images and maps. For the first year after the large-scale influx, it has remained the best source of regularly updated information. Its enumerators are also called upon by other agencies for smaller-scale surveys.

IOM's own work on GBV in this response has been of high relevance and quality, and standard-setting. At the same time, the coverage of IOM's and the collective protection services remains insufficient to deal with the protection threats and needs. Protection actions could have had more coverage and been more effective than they have been so far, because of the problematic neglect of basic protection measures in service sectors such as WASH, shelter and site planning. Greater effectiveness will require rapid integration of protection measures in all sectors, additional experienced protection staff within IOM and/or other agencies, but also stronger community leadership mobilisation and community protection mechanisms to prevent and reduce the incidence of GBV, possibly sexual exploitation and abuse by aid workers and trafficking.

The CwC/AAP working group has been an important catalyst for meaningful engagement with the affected populations but finds itself at the heart of the challenge to evolve a life-saving and supply-oriented response into a more people-centred and participatory one. . It has made valuable contributions e.g. with messaging and the attention to and investments in translation. The RTE team cannot comment on its coverage but CwC meeting minutes acknowledge the struggle to be effective. The collective response is still struggling with effective FCM that close the loop with responses, and which need to be site- and not only agency-based and adjusted to Rohingya preference for face-to-face

conversations with known people when it comes to sensitive issues. It is appropriate now to change the heading from 'CwC' to 'accountability' and 'participation', to signal that the objective now is not 'communication' but realising 'the right to participation'.

Participation: Has the affected population been involved by IOM (and in the overall response) in the design, implementation and monitoring of its response? To this question, the RTE's answer is clearly 'not sufficiently', and the interviewed Rohingya expressed a sense of disempowerment through the way aid so far has been provided. There are acceptable contextual reasons for this, but also deep-seated intrinsic obstacles among relief workers and in the incentives-structure of emergency relief. IOM has decent experience with 'community-stabilisation' (although sometimes with much focus on hardware). Different skills are needed here, also at scale. IOM may have to mobilise more agencies with strong expertise in participatory approaches.

Social identity-sensitive programming: Have data been disaggregated by sex, age, disability and ethnicity, and have gender, disability and ethnicity issues been included in the planning of interventions? Data are produced, including by IOM, that disaggregate by sex and age, and identify numbers or percentages of 'vulnerability' or 'households'. Some data e.g. related to 'access' risk leading to wrong interpretations because of the generally narrow definition with which 'access' is surveyed.

The RTE found that 'gender' -which goes beyond inclusion of 'men' and 'women' to e.g. social constructs of masculine and feminine behaviour- is inadequately paid attention to, although more conversations with e.g. UN Women and other organisations may alter that. If other comparable situations are anything to go by, we would, for example, expect Rohingya men to struggle with their inability to provide for and protect their families, possibly leading to negative behaviours (domestic violence, suicidal tendencies, engaging in criminal activity...). While there are child-friendly and women & girls' friendly spaces, it is not clear where men can express themselves in this regard.

The issue of 'ethnicity' or 'social identity' is not adequately paid attention to (across the collective response, not just by IOM). There is an untested assumption that the 'Rohingya' are a homogenous 'community'. It is not clear whether 'Bamar Muslims' from Myanmar find themselves among the refugees, and the small number of Hindu refugees among them is virtually never mentioned. There is also a general lack of appreciation of the not always smooth relationships between 'old' Rohingya refugees and 'new' ones, and especially between Bangladeshi nationals and Rohingya.

For future work in Cox's Bazar district, it may also be necessary to get a better understanding of the history of social identity changes in the district. Reportedly, it used to have a bigger Hindu and Buddhist population, which have now become minorities. Even if the real motivations behind the 2012 violence between social identity groups in the district were not religious, conflict entrepreneurs framed it in those terms. Ongoing confrontations between religious identity groups in neighbouring countries (Myanmar, Sri Lanka, India) could also stir up emotions here.

Transition and recovery/development: Thanks to its history, IOM is very well placed to also play a major role in the strategic shift to a more recovery/developmental approach. The challenge will be to go beyond service delivery projects, to pursue a deeper economic-investment-for-district-development approach.

Coordination: IOM's sector leadership -as that of others- has been of variable quality, at times affected by the lack of substantive experience of 'coordinators', and the personal maturity and competencies to gain respect for one's leadership in encouraging collaborative behaviours among formally independent agencies. IOM's overall response leadership has been 'good enough', particularly given that this is an unusual role for the organisation and in light of the intensive and prolonged challenge by other agencies. In the first months of the response however, IOM's positioning was also partially influenced by considerations of 'growth' and 'occupying terrain'. The willingness since, to bring UNHCR more into the coordination structure, deserves appreciation. Reportedly, the UN Resident Coordinator has played a very positive role in mitigating some of the overall tensions.

Admittedly, effective collaboration cannot be achieved by IOM alone, as the problems of data and information sharing show.

Connectedness: Although there have been some preliminary discussions among senior IOM management, the RTE has not identified a clear and intentional connection between the emergency response and the regular longer-term country programming. A major country-programme focus such as ‘irregular migration and counter-trafficking’ is highly relevant in Cox’s Bazar district, but currently under-resourced in terms of calibre and numbers of staff.

VII. Annexes

Annex 1: ToR and Inception Report

Terms of Reference

The Terms of Reference for the Rohingya RTE state the purpose as “*a formative, forward-looking evaluation to improve ongoing decision making and management of IOM’s emergency response to the humanitarian crisis in Cox Bazar as well as at a global level.*” The forward-looking intent is subsequently emphasised: “*The RTE will provide IOM with real-time and practical recommendations to facilitate operational improvements to strengthen the emergency response during the period covered by the 2018 Joint Response Plan (JRP) and, if already applicable, the stabilisation and development focused interventions.*” (p.2).

The ToR specific three focus areas:¹⁴⁸

- **Focus Area 1:** Retrospective: “*A review of the IOM’s Cox’s Bazar humanitarian response to date, including the quality and relevance of IOM’s ongoing interventions.*”
- **Focus Area 2:** Forward looking: “*Identification of opportunities for longer-term programming in Cox’s Bazar and a review of IOM Cox’s Bazar strategy to transition from what is primarily a humanitarian response to a more stable and development focused model as the situation allows.*”
- **Focus Area 3:** “*Implementation of IOM’s internal L3 procedures in supporting IOM’s response at HQ, RO, and country level to identify gaps and provide recommendations for improving procedures.*” This is the subject of a separate report.

The ToR suggest that the focus areas are examined for their relevance/appropriateness, effectiveness, coverage, coordination and connectedness, and/or others appropriate for the task at hand.

Process: In order to help IOM gather as much insight as possible with a light footprint on the country missions and IOM’s partners, the TOR envisage the RTE following a phased approach, allowing time for reflection and real-time feedback. The RTE will be participatory in its approach, to ensure ownership and promote interaction with the IOM team in the country office/sub-office in Bangladesh, selected staff in the Regional Office in Bangkok and IOM HQ, and relevant IOM partners.

Affected population: In keeping with the IASC Transformative Agenda, the RTE will make special efforts to consult the affected population to help inform the on-going response and promote accountability.

Target audience(s)

The ToR signals the RTE will be internal, with primary end users only the management team at IOM HQ and field staff.

Inception Report

IOM colleagues were conscious that the ToR were very encompassing, allowing interested review teams to determine their own take on them. It was clear however that the RTE had to take a strategic perspective, beyond projects or programmes.

¹⁴⁸ A RTE in 2014 of IOM’s response to the South Sudan crisis had only two, much more narrowly defined, focus areas: IOM’s implementation of its L3 procedures (similar to Focus area 3 of this RTE) and the CO coordination and implementation of two clusters, notably CCCM and Shelter/NFI.

The scale of the overall operation, the number of sectors/working groups IOM is actively involved in, the different roles it exercises, and the number of actors and key stakeholders in the situation, as well as the volume of documentation, make it impossible to review everything within a limited time.¹⁴⁹ As per the Inception Report, this RTE does not focus on the more ‘technical’, service delivery areas (health, WASH, shelter etc.). The challenges, problems, and achievements of these are relatively well known by IOM and collectively, and this RTE would probably not have added many new insights or recommendations.

The Inception Report signals the intent to focus the RTE on what are often more challenging aspects for an emergency response: protection, AAP/CwC and site management; interagency coordination; and income-generation, livelihoods and the relationships refugees-host communities (p. 17) As well as the Needs and Population Monitoring component of IOM’s work, which is an important service to the collective response. (p.19)

The Inception Report also proposes that the RTE look at a possible scenario of a significant decrease of international funding for the Myanmar refugees.

a. RTE opportunities, constraints and limitations

The actual RTE succeeds largely in meeting the objectives of the Inception Report, but also acknowledges limitations and constraints.

Time span: The ToR envisaged the period under review to be 25 August 2017 - 28 February 2018. The ToR do not specify a time horizon for the forward-looking aspect of the RTE. In practice, the time horizon of this RTE became from mid-2013 to end 2021.¹⁵⁰

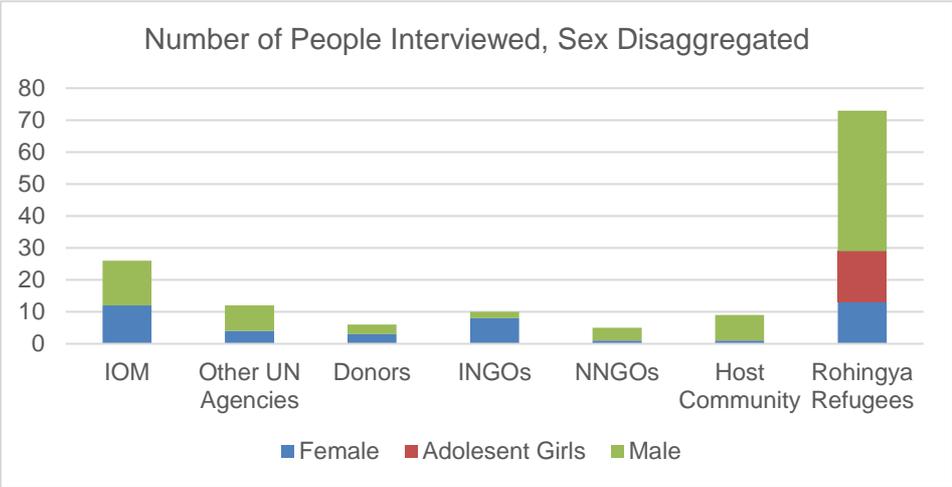
Balancing multiple attention areas within a limited time span: The RTE team had to balance the allocation of its limited time in Bangladesh between attention to the retrospective (focus area 1) and the prospective (focus area 2) orientations; between attention to IOM’s own response programming and its leadership role for the overall response; between institutional and operational issues; and between the views of IOM colleagues and those of other actors and stakeholders. There are inevitable trade-offs between scope and depth and rigour of inquiry. The choice of attention to the overall coordination challenge and the medium-term prospects inevitably orient the exercise towards the ‘larger picture’, just as the companion report to this one, on IOM’s practices in the Rohingya response in light of its L3 procedures, raises broader institutional questions. IOM’s own programming therefore received less detailed attention than might have been expected.

¹⁴⁹ The 2014 RTE of IOM’s response in South Sudan also selected some focus areas. This RTE 2-person team had a combined total of 15 days in Cox’s Bazar district and of 23 days in Bangladesh.

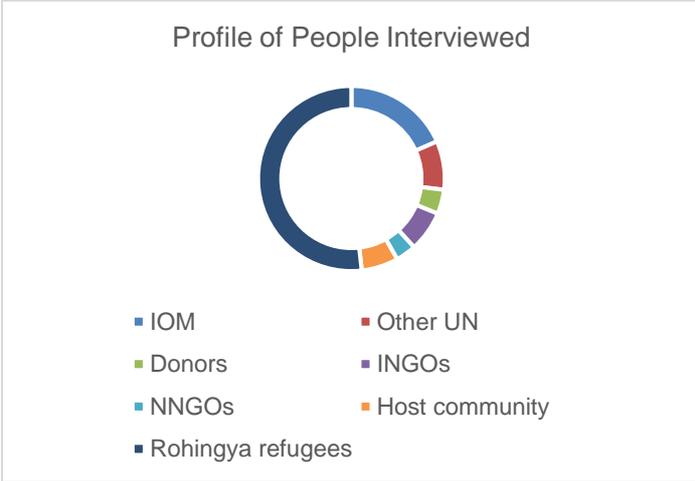
¹⁵⁰ As the field work took place in late June and the first half of July 2018, the actual crisis response period under consideration was adjusted accordingly. Exchanges around the inception report confirmed that the history prior to the August 2017 crisis is relevant. Because the TOR also invite reflections related to a ‘longer-term’ stabilisation and recovery period, this RTE intentionally tries to look ahead beyond the current Joint Response Plan (originally until the end of December 2018, now extended to end of March 2019)

Qualitative conversations: Annex 4 lists the individuals the RTE team was able to interview. Significantly missing are any GoB interlocutors, for which there was no time left. The RTE team met with representatives of DFID, ECHO and the Canadian aid section. But due to staff changes, no well-informed USAID officials were available at the time of their presence in Bangladesh. Staff changes in Dhaka also meant that no senior UNHCR officials were available, but some UNHCR colleagues were subsequently interviewed by remote calls. The evaluators only spoke with a few INGOs and local CSOs.

During earlier, non-IOM nor CMC-related work around the Rohingya response (February 2018), the RTE team members spoke with senior officials from the Refugee Relief and Repatriation Commission (RRRC), the Disasters and Relief Ministry, the NGO Affairs Bureau and the army. They also spoke with more international and Bangladeshi NGOs (including the Bangladeshi Red Crescent and SwisRed Cross societies), as well as with the head of the Swiss government’s aid section, and other humanitarian advisors (Swiss, DFID). This meant the RTE team had already some familiarity with an very complex context which, it was told, was one factor for which it was selected. The RTE team holds that the attention points identified during earlier work, insofar as the relate to the collective Rohingya response, are relevant and valid, if they are updated for a snapshot 5 months later.



Affected populations: The RTE team differentiates between three types of affected population: the ‘new’ refugees from Myanmar, the ‘old’ refugees from Myanmar, and the ‘host population’.¹⁵¹ In line with the IASC Transformative Agenda and the ToR, the evaluators did make a special effort to consult that population. The evaluators held four FGDs (two in the old Kutupalong camp of registered refugees and two in the new site ‘Camp 18’) and conversations with a few recently relocated individuals in



‘Camp 20 extension’. While compared with many other RTEs and evaluation¹⁵², listening to more than 70 refugees is not bad, it is also not enough for a total population of over 900,000. The evaluators also

¹⁵¹ There is a similar assumption of ‘homogeneity’ of the host population, as of the Rohingya community – both of which may be wrong.

¹⁵² Engagements with other evaluations indicate that often they reach no more than 15-35 members of an affected population. All depends of course on the scope of an evaluation, the size of the team and the time available on-the-ground.

sought to get together a number of well informed and possibly influential opinion makers from the host population. As this had to be organised on a Friday afternoon, the evaluators did not get the numbers and calibre of interlocutors they had hoped for. This affects particularly the inquiry into the area of livelihoods and refugee-host community relationships.

Surveys: The ToR envisaged one short survey of no more than 10 questions. There being too many topics, and too many potential interlocutors, the evaluators developed three thematically focused surveys.

- **Survey 1:** *IOM L3 procedures and practice through the Rohingya response* (internal to IOM; 15 invitations - 7 responses). In retrospect, this should have been circulated more widely.
- **Survey 2:** *Coordination effectiveness in the Rohingya response* (60 invitations, to a full list of coordinators, focal points etc. from diverse agencies etc. - 11 responses);
- **Survey 3:** *Income and livelihoods support in Cox's Bazar*: This survey was supposed to be sent out by the coordinator of the Livelihoods sector¹⁵³ to the active members of that sector-group, as the person did not want to give the RTE team the email address of the active members of that group. But it was never circulated.

Annex 5 lists the questions for the surveys on 'coordination effectiveness' and 'income and livelihoods support'. The separate L3 report lists the questions of the third survey. For Survey 1 and 2, two reminders were sent to the targeted individuals who had not yet responded, with several days interval, with little effect. A better response rate, especially for the second and third questionnaire, would have compensated for some of the missing interlocutors.

Several survey questions invited the respondents to elaborate narratively. This RTE report draws on these comments but does not publish them for two reasons: The number of respondents is not large and representative enough to make the data statistically relevant. Several comments are also strongly worded and could lead to unnecessary irritations.

Documents: The amount written about the Rohingya response is huge already. The RTE draws on IOM documentation and reports of various other agencies, several of which are survey based (though the RTE team cannot establish the methodological soundness of all surveys). Through another mandate, it was also able to see 12 proposals for different types of projects in response to the Rohingya crisis, from 7 Swiss NGOs. All of these include situational assessments and make reference to ISCG and NPM reports. They are one example of how ISCG and NPM reports are used.

Direct observation: IOM programming, past and present, takes place in many sites in Ukhia and Teknaf Upazilas. In theory, a selection of these must be visited, to observe first-hand the actual services and approaches. Time constraints made this impossible. The RTE team spent time in Camps 1, 18 and Camp 20 extension. The choices for Camp 1 and 18 resulted from the locations where Rohingya were convened to speak with it but did include an older and established site (Camp 1) and a new one (Camp 18). Camp 20 extensions was chosen deliberately to get a proper appreciation of what it takes to establish a basic 'settlement' in a new location. With more time, Camps 19 and 20 would have been visited, as well as sites in Teknaf Upazila, where IOM has been working for many years, which would have given a better comparative perspective.¹⁵⁴

Controversy: Every major crisis-response comes with a degree of controversy, among international and among national agencies, and between them. The controversy, particularly about the overall leadership and effectiveness of coordination, has been more intense in the Rohingya crisis response

¹⁵³ In February 2018, there was an attempt to initiate a working group on 'host populations', which did not activate due to differences about its scope of work. The topic then got subsumed under the 'Livelihoods' group.

¹⁵⁴ In February 2018, the members of the current RTE team were able to sit in and observe several sectors and working group meetings.

than average. There are and remain conflicting narratives about this, certainly about the period end August 2017-February 2018. This can result from lack of individual or institutional knowledge, or as part of ongoing disagreements. An RTE, unless much more focused, cannot do the forensic inquiry to identify and verify the more factual evidence. For the forward-looking purpose of this RTE, it captures what was heard about this, without trying to judge who is right or to what degree.

Simultaneous reviews: Due to circumstances, the evaluation team's field work followed shortly after an internal management review and coincided with an L3 review weekend. Senior colleagues from the Country Office, Regional Office and HQ were present at the latter, as well as the former CoM in Bangladesh. The RTE team is grateful for having been allowed to sit in on the first day of the L3 review. Presumably there is some overlap between the three exercises, with possibly converging but also diverging conclusions and recommendations. Not being privy to many of those, this report draws only on what the RTE team could cover.

Various RTEs, commissioned by others, have been conducted or are simultaneously ongoing. The RTE team would have benefitted from greater access to their findings and recommendations, to assess the degree of convergence or not with its own. It did have the RTE report of the response of the INGOs funded through the UK Disasters and Emergencies Committee (DEC); It spoke with the team leader of a more iterative/longitudinal RTE, commissioned by UNHCR. It did not have access to (draft) findings or recommendations of a UNICEF-commissioned RTE, or reviews of the 'protection' and 'communicating with communities' work. Undoubtedly some NGOs have also already conducted reviews or RTEs.¹⁵⁵

Responsibility: An RTE seeks to contribute to learning and adaptive management, it is not an accountability exercise. This RTE raises issues, some of which relate to aspects of IOM's own programme (e.g. NPM), and others for which it also carries some direct responsibility (e.g. the competencies of IOM recruited sector and working group coordinators). Other challenges (e.g. an evolution of a more needs-based to a more people-oriented approach, or the governance reform question) may or may not be perceived as part of IOM's mandate. Because of its role in the overall leadership of the collective response however, it shares at least part of the responsibility. The focus on learning and adaptive management also means that the RTE does not attempt to do a more rigorous contribution-, let alone attribution, analysis. This would in any case have required a much narrower scope and more time.

¹⁵⁵ The fact that UN agencies, in this case UNICEF, UNHCR and IOM, conduct their own separate reviews, is perceived by some other organizations working in the same field as (another) indicator of the inability of the UN to act 'as one'. The inter-agency coordination should do a comparative review of the respective findings and recommendations and make this available also to the donors.

Annex 2: RTE Team Profile

Koenraad Van Brabant (team leader): A humanitarian and peacebuilding professional with 30 years of experience, in crisis situations -overwhelmingly conflict-related- in over 20 countries. Mr Van Brabant has held progressive managerial positions, from project to directorate level, in various organisations. His practical experiences include:

Crisis and displacement management: Management of different programmes with different sectoral components. Specifically, also the senior management of an INGO's response to a very rapid and large scale (400,000 people) internal displacement in a politically and militarily very challenging context, and managing the then largest project in the world of another INGO in a prolonged refugee situation (200,000 people).

Coordination and collaboration: Within humanitarian contexts, he was twice elected to the Steering Committee of the NGO coordinating body for Afghanistan and in Sri Lanka led the transformation of an ineffective into a much better performing coordination body. He has also published on coordination practices. He has furthermore been the coordinator of several multi-country research projects and been the global focal point for NGO engagement with the "International Dialogue on Peacebuilding and Statebuilding". For six years he was co-director of an executive course on 'Collaborative Leadership for Peacebuilding', with the Geneva Centre for Security Policy.

Facilitation/collaboration: He is a very experienced facilitator of multi-actor events and processes, and currently pursuing further professional development as a partnership broker and in organisational and team coaching.

Quality and accountability: For several years he was a Research Fellow with the Humanitarian Policy Group at the Overseas Development Institute, being involved in the emergence of ALNAP and the Humanitarian Accountability Partnership (now the CHS Alliance). He currently chairs a multi-stakeholder commission that evaluates proposals for humanitarian action, submitted to a grant-making Foundation.

Evaluation: He has conducted several (real-time) evaluations and strategic reviews, typically in volatile and challenging environments and on request of the Dutch Ministry of Foreign Affairs, served on the Steering Committee of the performance evaluation of a large humanitarian Consortium. He is currently also an advisor to a reputed INGO to help develop their internal evaluation and evaluative thinking capacity.

Learning: For six years he was the Head of Knowledge Management in a leading peacebuilding NGO. He has consulted for a wide range of clients, which includes several UN agencies and donor governments, as well as a variety of international and a few national NGOs.

Prior engagements with IOM and in Bangladesh: In 2017, he produced comprehensive conflict-sensitivity guidance for IOM, and supported the IOM CO in Myanmar on the issue. As of mid-2018 he is part of a two-person Conflict Sensitivity Resource Facility, contracted by the EU Trust Fund, to support agencies that programme in Libya with its funding. This includes IOM. His first work in Bangladesh occurred in early 2018, under (separate) mandates from the Start Network's 'Disasters and Emergencies Preparedness Programme', and the Swiss Solidarity Foundation.

The original team consisted of K. Van Brabant and Dr. Sarah Kokhar. Ms Kokhar contributed substantively to the Inception Report. As she was not able to obtain visa for Bangladesh on time, she had to be replaced, a few days before the initiation of the field work. A Bangladeshi female researcher was considered but turned out not to be sufficiently available. Mrs Patel was then chosen because of her availability, prior exposure to the Cox's Bazar situation and to IOM

Smruti Patel (team member): A humanitarian professional with 20 years of experience in different roles and countries, at field level and in HQ of different organisations. She has worked with UN, the IFRC, INGOs and local/national NGOs. Her areas of expertise include quality management, community consultation, accountability to affected populations (AAP), prevention and protection of sexual abuse and exploitation (PSEA) and the ‘localisation’ and ‘participation revolution’ commitments of the Grand Bargain.

Crisis and displacement management: Management and/or support to different programmes in violence-related contexts such as Thailand (Myanmar refugees), Chechnya and Afghanistan, as well as responses to natural disasters (Gujarat India, Myanmar, Indian Ocean).

AAP and PSEA: For five years, she was Head of Membership and Certification Services of the Humanitarian Accountability Partnership (HAP), now the CHS Alliance, promoting greater accountability of relief agencies to affected populations. In that capacity she worked extensively with a variety of INGOs as well as several of their local and national partners, in Africa, Asia and the Middle East, putting in place or strengthening accountability practices. As a certified accountability auditor, she advised and accompanied various agencies in their process to HAP certification. She is also a certified investigator who oversaw and conducted training on PSEA and safe guarding and led several investigations. She is a member of the IASC AAP/PSEA Task team. As of September 2018, she started a new role as PSEA expert for Crown Agents’ HARP programme in Myanmar. She has also facilitated discussions for the ‘Listening Project’ (CDA Inc.) to document the experiences and views of people who have been impacted by international aid.

Localisation: In 2014, she conducted a Swiss Development Cooperation- commissioned capacity assessment of Syrian organisations operating out of southern Turkey. This confirmed that a different approach to organizational development was required, as well as more transparent principles on equitable partnership and funding for national and local organisations. In 2015 and 2016, she led the engagements with local and national NGOs in Asia, Africa and the Middle East to create a global network to raise the profile of their role in humanitarian and development work and demand an equal voice in the global policy debates and increased funding. She was Interim Executive Director of the network (NEAR), which was launched at the World Humanitarian Summit in May 2016. She has carried out reviews on localization for the Start Network and is currently member of the Start Network hub advisory group. She is also a member of the Charter 4 Change coordination group.

Evaluation: Graduate of an evaluation of humanitarian action course. One of the lead evaluators and authors of the ground-breaking Tsunami Evaluation Consortium's study on the “*Impact of the international relief response on local and national capacities*”.

Prior engagements with IOM and in Bangladesh: Consulted for IOM between March 2017 – March 2018, to develop its framework for accountability to affected populations. For this purpose, she carried out extensive consultations at HQ and some country offices (including IOM in Myanmar and South Sudan, south Turkey and Greece) to get a realistic idea about the accountability measures in place. She has been engaging with international, national and local NGOs in Bangladesh since 2008, particularly around AAP and PSEA standards, and localization practices, mostly for HAP and the Start Network.

Annex 3: Schedule

12 June 2018	Survey L3 procedures and practices sent out
18 June 2018	Interviews at IOM HQ
26 June 2018	Survey coordination effectiveness sent out
Friday 29 June	Arrival in Dhaka
Saturday 30 June	- Mia Seppo & Giorgi Gigauri
Sunday 1 July	- Edouard Beigbeder
Monday 2 July	- Alexandra McLean - Kazi Shahidur Rahman - Phedra Moon Morris & Mir Mhd. Saifur Rahman - Luc Soenen & Molit Billah
Tuesday 3 July	<i>Flight to Cox's Bazar</i> - Lewis Sida
Wednesday 4 July	- Hani Chatila - Takero Suzuki - Oriane Bataille - Sumbul Rizvi - Group meeting INGOs (Elisabeth Hallinan, Dominika Arseniuk; Philippa Beale, Florian Monnerie, Audrey Brenot, Save the Children) - Viviane Fluck – Internews - Dr. Chawla (Health Sector) – WHO
Thursday 5 July	- Focus group meetings with Rohingya men and women (separate) in Camp 18 - Short visit to Ukhia health centre – supported by IOM
Friday 6 July	- Ian - Group meeting with 11 Ukhia upazila stakeholders - Confirming camp location visit
Saturday 7 July	- Listening in to first day of internal L3 review meeting - Sarat Dash - Virginia Moncrieff
Sunday 8 July	Cassie Briggs Briefing with translator and confirmation of field trip Document review Note structuring
Monday 9 July	- Walk to Camp 20 Extension – conversation with Mirno Pasquali, conversations with newly relocated refugees – conversation with staff of Information Hub in (Camp 18) - Focus group Rohingya women in Camp 1 - Meeting with community leaders in Camp 1 - Jessica Olney - Internews director and 9 staff
Tuesday 10 July	- Audrey Brenot - Suranga Mallawa - Sanjukta Sahany - Margo Baars - Rahul Pandit - Richard Lacey - Country Director, Bangladesh at BBC Media Action - Protection Project Coordinator - PULSE – Protection Partner – NNGO - Executive Director – PULSE – Protection Partners – NNGO - Megan Smith & Emmie Sjarijono

Wednesday 11 July	<ul style="list-style-type: none"> - PSEA coordination meeting - Debrief IOM CXB <i>Return flight Dhaka</i> <ul style="list-style-type: none"> - Henry Glorieux
Thursday 12 July	<ul style="list-style-type: none"> - Debrief IOM CO: Giorgi Gigauri, Peppi Siddiq + Lane Krainyk - Rezaul Chowdhury, co-chair Cox's Bazar CSO and NGO Forum
Friday 13 July	Early morning departure from Dhaka
22 July	Kevin Allen, Head of Sub-office UNHCR, CXB
8 August	Edward Benson, UNHCR Bangkok
30 August	John McCue
7 September	Lewis Sida, team leader UNHCR RTE
10 September	Benedetta Cordaro
September	Draft 1 and comments
October	Draft 2 and comments
19 October	John McCue & Lauren Pearson
6 November	Final draft

Annex 4: People Interviewed

IOM Headquarters

Vincent Houver – Deputy Director - DoE
John McCue – Emergency Coordinator L3
Jean-Philippe Antolin – CCCM Rapid Response Officer, DOE
Tristan Burnett – Head of Preparedness and Response Division
Géraldine Ansart- Coordinator (Syria)
Wan Sophonpanich – CCCM Consultant, DOE
Alberto Piccioli - Former Shelter Sector Coordinator

IOM Regional Office

Andrew Lind, Regional Technical Advisor
Maria Moita, Regional Technical Advisor

IOM Country Office

Giorgi Gigauri CoM (co-chair of Strategic Executive Group)
Peppi Siddiq – Refugee Cell coordinator

IOM Cox's Bazar

Manuel Pereira - Emergency Coordinator and Head of Sub-Office
Clémentine Favier: Site development and Site management - IOM
Megan Denise Smith - GVB Operations Officer/ PSEA Focal Point
Emmy Nurmila Sjarijono – Counter Trafficking Officer
Benedetta Cordaro, Needs and Population Monitoring Coordinator
Takeru Suzuki - Needs and Population Monitoring, Information management officer
Sanjukta Sahany - Head of Transition and Recovery – CXB
Rahul Pandit - Transition and Recovery -CXB
Virginia Moncrieff – Acting CwC Coordinator
Iain McLellan – Head of Project support office
Site Manager – Camp 20 extension
Female volunteers – Information hub, Camp 18
Female supervisor – Information hub, Camp 18

IOM Yemen

Sarat Das: former Chief of Mission in Bangladesh

Other UN Agencies

Mia Seppo: Resident Coordinator and Chair of the Strategic Executive Group
Lane Krainyk, Humanitarian Affairs Advisor, Rohingya Refugee Response, OCHA
Edouard Beigbede, UNICEF Resident Coordinator
Kazi Shahidur Rahman – Humanitarian Affairs Specialist – Office of the UN Resident Coordinator
Henry Glorieux – Humanitarian Affairs Adviser – Office of the UN Resident Coordinator
Kevin Allen, Head of Sub-office Cox's Bazar – UNHCR
Edward Benson- UNHCR regional office Bangkok
Dr. Chawla: Health Sector coordinator – WHO
Head of WHO Sub-office in Cox's Bazar

Donor representatives

Luc Soenen – Regional WASH & Shelter expert, European Commission – ECHO Regional office Bangkok
Molit Billah – Programme assistant – European Commission (Dhaka)
Suranga Mallawa, Surge Response Expert ECHO - CXB
Phedra Moon Morris – Head of Aid – Canadian High Commission
Mir Mhd. Saifur Rahman, Development advisor - Canadian High Commission
Alexandra Maclean – DFID Bangladesh – Team leader – humanitarian

Coordination

Sumbul Rizvi, Senior Coordinator of the Intersectoral Coordination Group
Margo Baars, ISCG Secretariat Manager
Hani Chatilla, Shelter/NFI sector coordinator - IOM
Oriane Bataile, Site Management sector coordinator – DRC

International NGOs

Richard Lace - Country Director, Bangladesh at BBC Media Action

Viviane Fluck - Internews

Save the Children – no name

Audrey Brenot, Fondation Terre des Hommes

Cassie Biggs, Fondation Hirondelle

Elisabeth Hallinan – outgoing coordinator of the INGO Forum

Dominika Arseniuk – incoming coordinator of the INGO Forum

Jessica Olney - Centre for Social Integrity

Philippa Beale - Regional Head of Programmes, DRC

Florian Monnerie - Senior Protection Manager, DRC

Ernesto Lorda, Medair – shelter partner

Bangladesh Civil Society Organisations

Abu Murshed Chowdhury & Rezaul Karim Chowdhury: co-chairs of the Cox's Bazar CSO and NGO Forum

A.H. Rahman, Executive director BNNRC Bangladesh NGOs Network for Radio and Communication

Protection Project Coordinator - PULSE – Protection partner

Executive Director – PULSE – Protection partner

Other

Lewis Sida, team leader UNHCR evaluation

Community Consultations**Host community/Ukhia social organisations**

7 people from Ukhia upazila local social organisations, a businessman and a journalist from Ukhia, and an elected Union Parisad councillor, also from Ukhia

Rohinya refugees

Rohingya women – 9 Women camp 18

Rohingya men – 15 men camp 18

Rohingya leaders – 25 men, camp 1

Rohingya adolescent girls 16 and women 2 volunteers – 18, camp 1

Family 1 – Camp 20 Extension- 1 adult female, 3 girls 4 boys, 1 adult male

Family 2 – Camp 20 Extension – 1 adult female, 1 adult male, 1 adolescent girl, 1 girl and two boys

Elderly man – Camp 20 Extension

Male Labourers – 3 Camp 20 Extension

Annex 5: Survey Questions for this Report

Coordination effectiveness in Rohingya response (broader target audience)

1. How do you rate the current effectiveness of the sector or Thematic/ Technical Working Group you most frequently participate in?
 - Extremely effective
 - Very effective
 - Somewhat effective
 - Not so effective
 - Not at all effective

2. Decision and recommendations from Thematic Working Groups get well integrated into sectorial planning and practices.
 - All
 - Most
 - Some
 - A few
 - None

3. How do you rate the current coordination effectiveness in the primary camp or settlement location your agency is operating in?
 - Extremely effective
 - Very effective
 - Somewhat effective
 - Not so effective
 - Not at all effective

4. Currently there is effective convergence between GoB coordination and the aid agencies coordination.
 - Strongly Agree
 - Agree
 - Neither agree nor disagree
 - Disagree
 - Strongly disagree

5. Currently coordination at camp/ settlement level actively takes into account feedback from the refugees.
 - Always
 - Usually
 - Sometimes
 - Rarely
 - Never

6. Service standards for the refugees set by the aid agencies are similar to those set by the Bangladesh Government for the host population.
 - Much better
 - Better
 - Almost the same
 - Worse
 - Much worse

7. What are the most significant changes in coordination practices that you have observed?

8. There is currently a strong connection between the strategic and operational coordination.
 - Strongly agree
 - Agree
 - Neither agree or disagree
 - Disagree
 - Strongly disagree
9. What is currently the most significant weakness in the coordination structure or practices?
10. What do you recommend to improve coordination effectiveness?

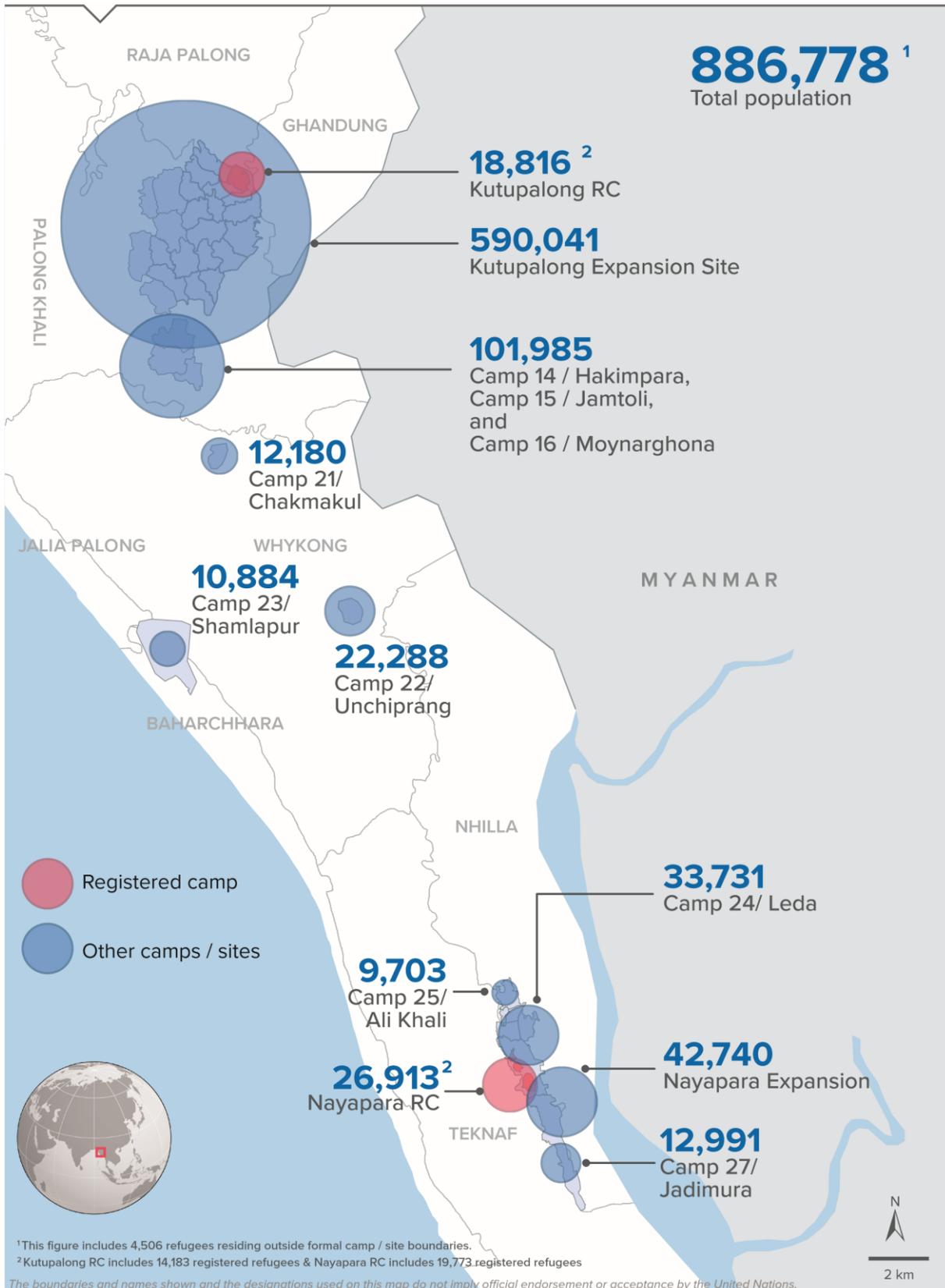
Income and Livelihoods support in Cox's Bazar (target group, active members of Livelihoods working group)

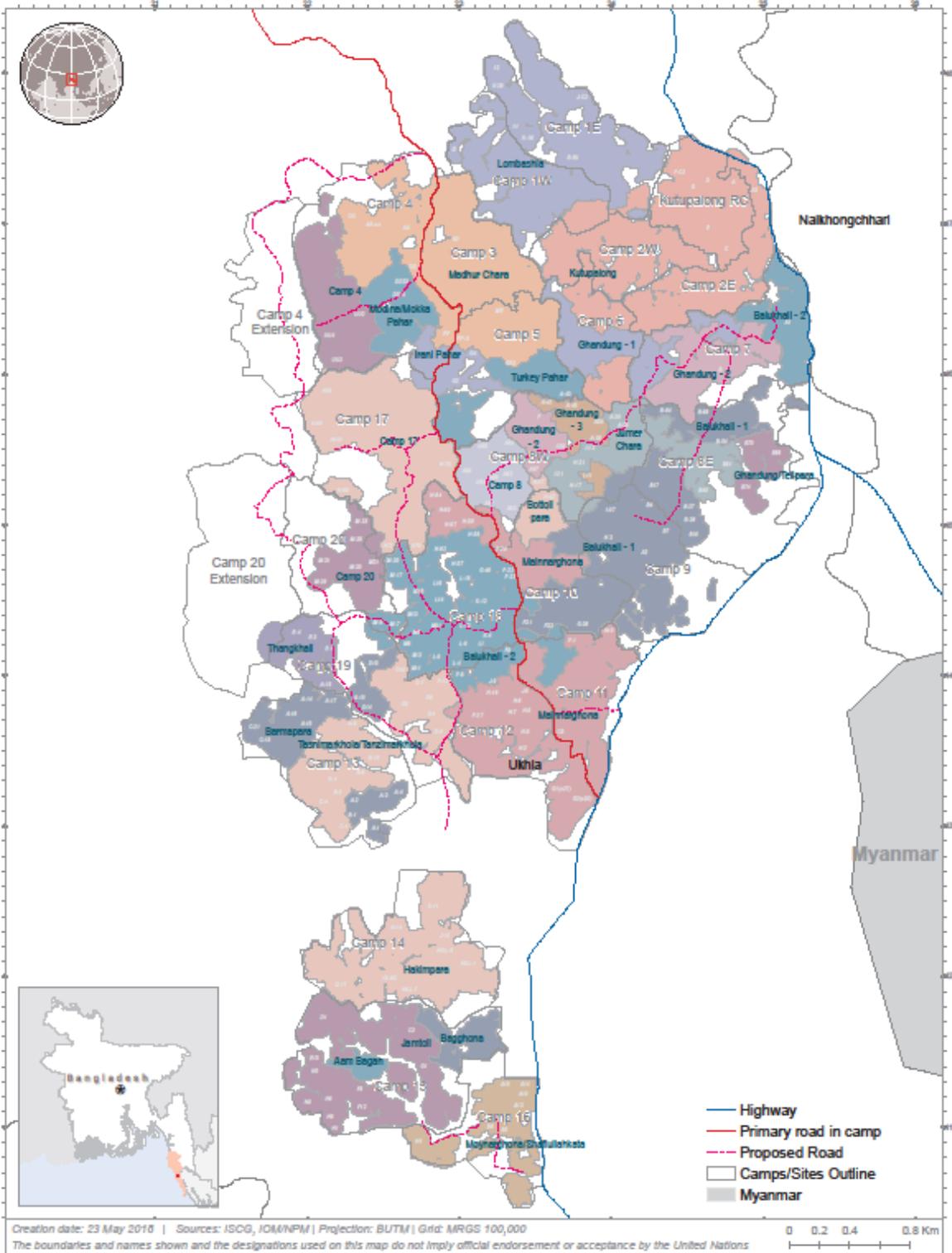
1. What are the most important aid agency approaches to stimulate income-generation and livelihoods for refugees?
2. What are the most important aid agency approaches to stimulate income-generation and livelihoods for the host community?
3. Food production and dietary diversity within the refugee camps can be increased
 - Great deal
 - A lot
 - A moderate amount
 - A little
 - None at all
4. Research has focused on Ukha and Teknaf. We currently also understand the economic impacts on the population in the town of Cox's Bazar.
 - Great deal
 - A lot
 - Somewhat
 - A little
 - Not at all
5. Bangladeshi employing cheaper Rohingya casual labour are criticised by their fellow Bangladeshis.
 - A great deal
 - A lot
 - A moderate amount
 - A little
 - Not at all

Please explain your answer
6. Much is made of the negative economic impacts of the refugees on the host community livelihoods. Is the statistical evidence used to nuance that perception among the host community?
 - A great deal
 - A lot
 - A moderate amount
 - A little
 - Not at all

Please explain your answer

7. The inter-agency self-reliance survey of Jan 2018 identifies a strong demand in the host community for access to capital. How is the aid community responding to this?
8. Active use is made of existing Bangladeshi public and private resource centres (research, financing, relevant training etc) to stimulate income generation and livelihood provision among the host community.
 - A great deal
 - A lot
 - A moderate amount
 - A little
 - Not at allPlease explain your answer
9. The experience and expertise of local and national CSOs with micro-finance is mobilised to support income-generation and livelihood development among the host population.
 - A great deal
 - A lot
 - A moderate amount
 - A little
 - Not at allPlease explain your answer
10. Who is thinking how to turn the presence of an extra 700,000 labourers and consumers into an economic opportunity for Cox's Bazar?





Annex 7: Summary Overview of Financial Allocations per Sector/Theme

Sector	Appeal 2018	Outside appeal 2018	Appeal 2017-2018	TOTAL
Overhead	2,676,591	106,029	4,538,179	7,320,799
S&O	7,325,366	366,030	8,559,045	16,250,441
Shelter/NFI	9,887,539	0	18,031,184	27,918,723
SMSD	10,711,621	0	5,817,588	16,529,209
WASH	2,421,715	0	10,710,174	13,131,889
Health	1,762,233	355,678	6,728,528	8,846,439
TRD	3,524,039	928,420	3,100,000	7,552,459
Protection	1,002,812	594,586	2,180,935	3,778,333
Coordination	1,064,472	0	1,670,078	2,734,550
CwC	150,328	0	805,075	955,403
NPM	350,000	0	164,205	514,205

