THE ROLE OF NATIONAL CIVIL SOCIETY AND MEDIA IN SUPPORTING ACCOUNTABILITY AROUND HUMANITARIAN INTERVENTIONS IN SOMALIA

SOMALI PUBLIC AGENDA RESEARCH REPORT NO. 16

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Acknowledgments

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Frequently used acronyms

IASC	–	Inter-Agency Standing Committee
CSOs	–	Civil Society Organizations
FMSs	–	Federal Member States
AAP	–	Accountability to Affected People
OCHA	-	United Nations Office for the Coordination of Humanitarian Affairs
IDPs	–	Internally Displaced People
UNICEF	–	United Nations International Children's Emergency Fund
FGS	–	Federal Government of Somalia
MoPIED	–	Ministry of Planning, Investment, Economic and Development
TPM	–	Third-Party Monitoring
NGOs	–	Non-Governmental Organisations
FGDs	–	Focus Group Discussions
UN	–	United Nations
SMSJ	–	Somali Mechanism for Safety of Journalists
SoDMA	–	Somali Disaster Management Agency
OAG	–	Office of the Auditor General
M&E	–	Monitoring and Evaluation
ACU	–	Office of the Prime Minister established the Aid Coordination Unit
NDP9	-	9th National Development Plan
MoIFAR	–	Ministry of Interior, Federal Affairs and Reconciliation
AIMS	–	Aid Management Information System
OPM	–	Office of Prime Minister

Executive summary

Over recent decades, accountability has become a key focus in the humanitarian sector, with increasing efforts to prioritize affected people. However, the sector has not fully achieved its goal of improving accountability to these communities. A core challenge is that much of the accountability discussion remains internal, among humanitarian agencies and donors, with limited attention to how accountability is understood and practiced locally in crisis-affected communities. The debate often excludes perspectives from local actors, such as national civil society, media, and advocacy organizations. Policy research has largely focused on the views of humanitarian agencies and donors, particularly from the Global North, while perspectives from the Global South have been overlooked.

This study aims to address this gap by examining how domestic actors in Somalia, including local media, civil society organizations, and government institutions, view and engage with accountability. It identifies overlooked perspectives, examines how local stakeholders attempt to improve accountability to their communities, analyses the political economy dynamics shaping these efforts, addresses main challenges and presents targeted recommendations to each stakeholder.

Key findings

The study reveals that there is a significant lack of awareness about humanitarian accountability as a concept and a right in Somalia, despite its recognized importance by local civil society and media. A gap exists between humanitarian agencies and affected communities in understanding this concept. While various stakeholders and organizations have differing views on accountability, efforts for implementation are visible but insufficient in practice. Humanitarian agencies and donors play the key role in shaping accountability initiatives, and affected communities and aid recipients remain unclear about its purpose and potential outcomes in the humanitarian context.

Further, Somali-based civil society organisations have a limited role in humanitarian accountability, and are mainly involved in providing third-party monitoring for agencies and donors. Their effectiveness is hampered by multiple factors, including lack of capacity, resources, understanding and instances of corruption. Local media's role is also minimal, primarily focused on crisis reporting and aid distribution, with no dedicated humanitarian outlets. Media operations also face many constraints, including political influence, skill gaps, financial difficulties, and restricted freedom. While government institutions have started contributing through policy initiatives, implementation and monitoring phases require improvement and clearer emphasis.

Collaboration between the government and humanitarian agencies is more common compared with CSOs and local media. However, greater coordination among all stakeholders, though recognized, has yet to see promising progress.

Analysing political economy dynamics, the study found that corruption and conflicts of interest within the humanitarian sector significantly hinder accountability initiatives in Somalia. Government contracts are often awarded to organizations linked to politicians, compromising fair procurement and accountability. Media outlets face restrictions, pressure, and insecurity, discouraging whistleblowers and journalists from exposing corruption. Humanitarian agencies tend to seek avoiding being impacted by domestic political economy dynamics, focusing on project delivery rather than accountability. The study highlights that financial dependence, personal interests, and a lack of enforceable policies are key factors limiting effective humanitarian accountability to affected populations.

The study highlights several challenges to promoting accountability: a poor understanding of accountability among affected communities and aid recipients, limited access to information on humanitarian projects by the government, media, and CSOs, and insufficient capacity, resources, and expertise in these institutions. The Somali media also faces job insecurity, and there is a lack of political commitment to advancing accountability. Other issues include the exclusion of community input in project implementation, gatekeeping of information by humanitarian agencies, unclear mandates among government bodies, government misuse of power over agencies and media, and conflicts of interest among stakeholders.

Notwithstanding these challenges, there is the recognition of the need for and importance of humanitarian accountability in Somalia among the CSOs, local media, affected communities and aid recipients. This is key for future efforts in promoting the accountability in this sector. There are instances of attempts and efforts to demand accountability from local stakeholders that can be further supported, improved and structurally directed.

Recommendations

The study finds there are opportunities for greater collaboration among CSOs and local media in Somalia to work together to combat corruption and enhance accountability, as well as with government, donors and implementing agencies. The following are the study's main recommendations for improving humanitarian accountability.

CSOs and media should collaborate to raise awareness on humanitarian accountability, focusing on importance of consent, mistreatment, and community rights. Radio is key for rural outreach. They must develop and enforce codes of conduct to prevent misconduct and corruption, promote impartiality, and protect whistleblowers. Local media outlets should strengthen internal policies to support journalistic freedom and increase coverage of humanitarian issues alongside hard news and politics. CSOs should amplify the perspectives of aid recipients and affected communities, using their monitoring role to promote accountability to the government and humanitarian agencies.

For Government, institutions must enforce policies on accountability, transparency, and corruption prevention. The FGS should clearly define the mandates of government bodies involved in humanitarian efforts to prevent mismanagement and confusion. Government institutions should publicly share project reports and stop censorship of media and pressure on CSOs regarding humanitarian issues. Government instituions should investigate procurement, contract awarding, and TPM hiring to eliminate corruption and conflicts of

interest, while allowing unhindered TPM field visits for unbiased reporting. Sufficient funds should be allocated for independent monitoring and evaluation of humanitarian projects to ensure transparency and prevent mismanagement.

Implementing agencies should share project information with affected communities, civil society, and media to foster collective accountability efforts. They must engage affected communities in meaningful consultations during project design and implementation, considering the local context and ensuring inclusive representation. Donors and AAP actors should actively investigate corruption and consult trusted Somali experts to ensure aid is relevant, effective, and avoids local conflicts, ensuring humanitarian efforts meet real community needs. International actors should expand capacity-building efforts to include CSOs, local media, and communities, equipping them for investigative journalism and accountability processes and ensure their financial independence for unbiased reporting. International actors and donors should transition from short-term humanitarian interventions to development-focused efforts, investing in infrastructure, institutions, and long-term sustainability in Somalia.

For future research, humanitarian accountability in Somalia is under-researched. Building on this study and limited existing literature can provide further insights to improve accountability practices. Further research should explore the political economy of aid distribution in Somalia to better understand stakeholder relationships and improve coordination and aid effectiveness. Awareness gaps and expectations for compensation among interviewees can hinder unbiased data collection.

Introduction

Over the past few decades, accountability has been a growing concern within humanitarian sector, with significant investment and constant references being made to 'putting people at the centre' of humanitarian activities. Alongside this widespread commitment to accountability, there is also a growing consensus and recognition amongst humanitarian agencies that progress towards strengthening its accountability to affected people has been limited (Sattler 2021). This has generated self-reflection within the sector about how humanitarians agencies might be able to 'do' accountability better, for example, from emphasising accountability to affected people, including two-way feedback, as part of the 2016 Grand Bargain Commitments (Metcalfe-Hough et al. 2021), and the formation of the Inter-Agency Standing Committee (IASC) Results Group on Accountability and Inclusion (which completed its mandate in March 2022).

As these discussions over improving accountability continue, there remains a core challenge: much of the debate over accountability remains within the sector, amongst humanitarian agencies and donors. There remains little attention within humanitarian research on views of accountability within communities in which crises occur, and how accountability is understood, contested and practiced by actors locally, in relation to, but also beyond, humanitarian intervention.

The tendency has been for humanitarian actors to discuss amongst themselves about how they can do better to be more accountable. There is little investigation into how ideas of accountability might compare or be connected to other initiatives to improve accountability across society as a whole and within the places they operate (e.g., including national civil society, media and advocacy organizations). Furthermore, this means much policy-focused research has focused on the perspectives and priorities of humanitarian agencies, donors and policy researchers based in the Global North, with much less attention to ideas and perspectives across the Global South.

This research report aims to help address this gap by situating perspectives of humanitarian accountability in relation to domestic factors, perspectives and actors involved in accountability initiatives in Somalia, a country that experiences long term, protracted humanitarian crises. Drawing on interviews in Mogadishu conducted in Spring 2024, the study explores how different actors in Somalia, including local radio and TV, civil society organizations (CSOs), and government institutions view and engage on accountability issues, and political economy dynamics that shape their activity and the options open to them.

The report is structured as follows. After a brief review of dominant narratives of accountability within the humanitarian sector in Somalia, the report unpacks how Somali-national civil society, local media and journalists understand accountability, drawing out similarities, differences and overlapping influences. Second, we review the ways that local stakeholder groups are attempting to enable greater accountability to local communities. With this, we

consider which understandings of accountability are given attention, and which are not. Third, we consider political economy factors that shape the power dynamics around accountability measures, and how this helps to explain what does and doesn't take place. Finally, we conclude with reflections on what humanitarian actors in Somalia and beyond can learn from considering perspectives and experiences of accountability within the communities in which they operate. It suggests possible ways forward for international humanitarian actors to engage and support more locally grounded approaches to accountability.

Box 1 Methodology and sources

A qualitative research methodology was employed in order to draw out how Somalia-based CSOs and media outlets perceive and approach humanitarian accountability, and what factors affect their own efforts to strengthen accountability to communities in Somalia. 15 in-depth interviews were conducted during early January to late February 2024 in Mogadishu, the capital city of Somalia. The selection of interviewees was conducted through a purposive, non-random sampling method, leveraging SPA's network and soliciting recommendations for additional potential interviewees from the key informants interviewed (snowball sampling). The key informants interviewed were representatives of different stakeholders within the humanitarian sector, including Somali civil society organisations, local media outlets, officials from pertinent government ministries including the FGS Ministry of Interior and the FGS Ministry of Planning, and individual experts familiar with the context. Subsequent to the data collection phase, the interviews were transcribed, organized, and analysed based on thematic coding. In addition, we also drew on qualitative research and a literature review conducted as part of a wider Overseas Development Institute (ODI) study on political economy challenges to accountability in the humanitarian sector (see Tindall, 2024; Diepeveen, Tindall, and Bryant 2023)

A principal limitation of this study was the relatively small sample size of interviewees, which may not be representative of the broader sectors. Second, due to time, budget and security constraints, interviews were conducted in Mogadishu, and we could not interview key informants from other cities within the Federal Member States (FMSs) where much humanitarian aid is implemented. This further restricts the study's scope and generalizability. The short study timeframe also limited some access to interviewees. The research team's prior research in Somalia on governance and accountability helped in addressing some of these limitations, drawing on existing networks and wider qualitative research insights. Still, findings should be approached as a starting point for further research and a more expansive discussion of the opportunities and challenges of approaching humanitarian accountability as part of a wider ecosystem of community- and nationally based accountability efforts.

Accountability narratives within the humanitarian sector in Somalia

Accountability is a difficult concept to define within the humanitarian sector. The idea of accountability to affected people raises questions about who is and should be responsible to whom in humanitarian action, on what basis, and for what aspects of intervention.

There is a shared acknowledgement among humanitarian actors that the sector has not achieved its collective aim to improve accountability to affected people (Knox Clarke 2018). Despite 'Accountability to Affected People (AAP)' gaining a concrete place in initiatives like the 2016 Grand Bargain Commitments (Metcalfe-Hough et al. 2021), and a diversity of ways that views of affected people are sought – from third party monitoring, to call centres and feedback platforms, to corruption-focused initiatives – progress has been slow. This has given way to some reflection about whether the sector has been taking the right approach to accountability in programming and policies (Diepeveen, Tindall, and Bryant 2023).

The AAP agenda reflects a commitment within the sector by 'taking account of, giving account to, and being held to account by the people humanitarian organisations seek to assist' (Sattler 2021, 5). This agenda is reflected in various initiatives including active participation in programming decisions, two-way communication between humanitarian actors and affected communities, information sharing with affected communities, and feedback mechanisms. UN OCHA's Flagship Initiative, launched in 2023, reaffirms the centrality of accountability to affected people in its underpinning aim to ensure 'the priorities of crisis-affected communities drive humanitarian initiatives' ("Flagship Initiative," n.d.). This translates into five perceived drivers of transformation: 1) Systematic and participatory community engagement; 2) Area-based decentralized coordination; 3) Funding Local Communities' Priorities and Capacities; 4) Community-prioritised humanitarian planning; and 5) Resident and Humanitarian Coordinators 'empowered' to drive a response that addresses community priorities. The narrative therefore around the Flagship Initiative reaffirms the importance of accountability through community engagement and participation, localized funding, and the centring of community priorities. To do this, it devolves coordination authority to the level of the Resident and Humanitarian Coordinators.

From here the AAP agenda has been limited in two keyways. First, existing initiatives often fail to achieve their aims. While there is a growing number of people being consulted in needs assessments and performance assessments, this is relatively low compared to other areas of progress in the sector (Sattler 2021). The 2020 Grand Bargain annual independent report found 'no evidence of a system-wide move towards a transformative approach that affords affected populations strategic influence over the aid they receive and how they receive it (Metcalfe-Hough et al. 2020).[1] The reasons for this are multiple and compounding. Information access amongst affected communities seems to remain insufficient. The format and timing of feedback is often detached from programme decision-making (Knox-Clarke et al. 2020, 44).

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1   As quoted in the Stuck in the Weeds report.

Local actors are also not necessarily involved throughout the programme cycle, limiting their influence (Holloway and Lough 2020). An ODI report on collective AAP measures further indicates efforts are constrained by lack of high-level buy-in and a shared understanding of what is involved, as well as insufficient funding (Holloway and Lough 2020).

Programmes like the Flagship Initiative indicate a recognition of these challenges and attempts to rebalance power within existing structures to help overcome some of these gaps in realizing accountability efforts in practice. However, second, in addition to challenges in implementation of accountability efforts, there are also deeper sets of issues about how accountability is defined. Is it sufficient to equate accountability with participation, feedback or two-way communication? The focus on feedback, for example, narrows what accountability might look like. The AAP agenda is often underpinned by assumptions about the value and importance of feedback (Madianou et al. 2016), for example, providing for better or more inclusive decision making (Diepeveen, Tindall, and Bryant 2023). However, feedback mechanisms are not necessarily aligned to programmatic timeframes or decision-making processes (Sattler 2021). Also, it can lead to, and/or reinforce forms of exclusion, depending on what cannot be represented or accounted for through feedback forms/other channels, or who is unable to engage (e.g. lower literacy levels, less connectivity and lack of access to mobile phones, more remote and insecure locations) (Diepeveen, Tindall, and Bryant 2023).

Further, there are multiple accountability relationships at stake within humanitarian interventions, again, which are not always aligned. Accountability up to donors, and to those who fund humanitarian intervention, can compete with accountability to the people who are affected by crises. Often, monitoring and evaluation activity is driven by the funders of interventions, concerned that activities are being implemented as planned. Even if this might be intended to meet the needs of those affected, their voices and priorities are secondary and driven by a primary concern for accountability to donors (Diepeveen, Tindall, and Bryant 2023).

Within Somalia, an ODI research study (Tindall 2024) finds both of these challenges around accountability in practice. Tindall (2024) similarly identified a focus on accountability as feedback, and a lack of attention to the power dynamics that complicate the realization of accountability relationships with affected communities. Tindall explains how humanitarian actors have often started from an assumption that accountability can be improved through more, and better, opportunities for affected communities to feed back to humanitarian actors. This has been reflected in the implementation of numerous initiatives to facilitate two-way communication and feedback with affected people in Somalia, including surveys and call centres (Diepeveen et al. 2022), perception surveys and analysis, and radio and other communication platforms. Humanitarian focused feedback channels are often detached from the political realities of the humanitarian intervention in Somalia, including the unequal power distributions that surround the protracted/long-term humanitarian intervention (Tindall 2024).

In summary, within the humanitarian sector, agencies and donors have reaffirmed their commitment to ensuring that crisis-affected communities and their priorities remain in the driver's seat. This is translated into high level commitments and a series of initiatives/efforts that often consider accountability from the perspective of improved feedback, participatory

engagement and two-way communication. Consistently, implementation of these initiatives faces challenges, linked to the political economy of humanitarian programming, including power dynamics, funding relationships and programmatic cycles.

Somali civil society and media perspectives on humanitarian accountability in Somalia

The challenges of defining humanitarian accountability become even more pronounced in Somalia when looking beyond international humanitarian discussions to the views among the Somali public, local media, civil society and government. This section considers perspectives on humanitarian accountability emerging from interviews with Somali-civil society and media professionals (e.g. journalists and radio stations) whose remit includes enabling 'accountability' to the Somali public. The aim is not to be representative, but to begin to explore intersections, commonality and divergences in how accountability is understood within Somalia and in relation to narratives of accountability in the humanitarian sector.

1. **There is a lack of awareness of humanitarian accountability as a concept and right in Somalia, even as local civil society and media actors see its importance**. Across media, civil society and government, interviewees consistently underscored that there are low levels of awareness and understanding about humanitarian accountability in Somalia. They attributed this to several reasons, not the least, a perspective that the constant need for humanitarian responses overrides any consideration about its accountability. They suggested that most Somali aid recipients are not aware there is, or should be, a relationship of accountability in which humanitarian agencies are accountable to them. Rather, interviewees commonly suggested that more often humanitarian assistance is viewed as generosity or charity, versus fulfilling a basic human right.

2. **Interviewees identified multiple values of existing approaches to accountability for humanitarian agencies**. Our interviewees consistently highlighted the importance of accountability in the humanitarian sector – especially *to* implementing agencies and donors. They suggested that accountability manifests in practice in ways that benefit humanitarian agencies in multiple ways – both in terms of giving assurance on the efficacy of their programming and to reinforce their legitimacy and credibility.

    First, interviewees suggested that accountability interventions are a means of assurance: assuring donors and implementing agencies that the intended people received the intended amount of assistance by humanitarian actors, thereby confirming that programmes were being implemented as funders intended. With this, some interviewees pointed to an emphasis among humanitarian implementing agencies to ensure that intended recipients receive the intended amount of assistance, seeking to eliminate aid diversion.[2]

    Second, they suggest accountability can form part of implementing agencies' appeal and credibility to donors. Transparency to affected people, they suggested, could help to build a strong reputation among donors and increase their perceived reliability to deliver future programmes. There was a sense among interviewees that accountability efforts had an instrumental value to humanitarian agencies: making assistance more effective and better targeted, as well as contributing to increased credibility upward to donors.

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2   Interview with CSOs representative, 24 January 2024.

Third, interviewees suggested that accountability functions as a guide for humanitarian agencies to ensure that their activities aligned with humanitarian standards and guidelines. Our interviews recognized that there should be a push in the sector to centre the needs of affected people. Interviewees suggested that humanitarian agencies should invest in accountability initiatives having high expectations. They could ensure projects did address community needs.[3] It could be a means to solve other challenges in humanitarian programming, including trust, and confidence building between humanitarian actors and affected communities.

3. **There is a gap in understanding between humanitarian agencies and affected communities.** Interviewees' observations showed that on one side, they saw a value in how accountability could be approached and what it can do in the humanitarian sector. As indicated in the above section, they articulated that existing approaches to accountability by humanitarian agencies in theory can push towards better targeted and more efficient programmes. Equally, while interviewees – who were from civil society, the media and local government – had a view of what humanitarian agencies meant by accountability, they suggested that the communities they engage with, including the urban poor and Internally Displaced People (IDPs), do not have a clear understanding.

    They suggested that this lack of understanding derives from a combination of inadequate access to education, experiences of conflict, and limited accountability structures in other sectors, including government. According to interviewees, many within communities affected by crises lack access to basic necessities including primary education. According to the (2024) United Nations International Children's Emergency Fund (UNICEF) annual report, around 4.8 million school-aged children in Somalia lack access to quality education. Internally displaced children are particularly affected, with about 63% of the estimated 1.7 million displaced children having no access to learning. The newly displaced face the greatest challenges in accessing education. This is complicated by armed violence in the country over the years, which have resulted in a state of exception whereby channels and practices of accountability were limited in wider society, including with nascent and weak public institutions. Further, interviewees suggested that from the view of affected communities, humanitarian interventions are complex, making it difficult for communities to unpick what forms and relations accountability do or should exist.

4. **Outside of the humanitarian sector, different perspectives on accountability exist among key stakeholders.** Interviewees suggested that in Somalia, there is no clear public consensus on what accountability means in relation to the humanitarian sector,[4] and what humanitarian actors and other stakeholders, including the Federal Government of Somalia (FGS), CSOs including local media and community groups, are trying to achieve when they engage in initiatives aimed at accountability.

    From our interviews, we identified an aligned understanding among Somali and humanitarian actors about what accountability means within a project structure. Generally, this was seen to include structured consultations and delivery within the context of funders'

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3   Interview with Media representative, 15 January 2024.

4   Interview with individual expert, 18 January 2024.

and implementing agencies' project aims. The FGS, CSOs and international humanitarian actors tend to hold meetings and consultations prior to project implementation to consult the views of a community around a particular programme or project plan. One interviewee suggested that accountability is needed in project implementation as the amount of assistance that reaches final recipients is reduced as layers of gatekeeping between humanitarian agencies and local communities extract portions of assistance.[5] However, outside of a specific set of project aims, there seems to be little understanding about what accountability could mean in the humanitarian sector.[6]

Further, among the interviewed Somali stakeholders who explicitly considered accountability in relation to their own work, their views of what is required to push for greater accountability differ. Government accountability was suggested to relate to a particular institution's mandate as described by law. As for the CSOs, accountability was seen to be towards the communities in which they operate. Accountability for the media is as the voice of public in general (and the affected communities in particular) in reporting the reality on the ground and exposing any wrongdoing. Local CSOs and media actors (e.g. journalists, local radio) also tend to be proximate to affected communities, living and working locally. A local presence and belonging further shapes how they approach accountability, and key issues and priorities.

Each group therefore operates within a slightly different set of power dynamics and views of what it means to be accountable to a local community. While each has the potential to push for the priorities and perspectives of affected communities, they do so from particular and partial perspectives. Further, these organisations also have power dynamics between them, meaning that in addition to accountability to communities, they also can potentially hold one another to account. For example, CSOs can seek to hold the government and humanitarian agencies to account. Interviewees discussed how CSOs could take on the role of holding the government to account for neglecting humanitarian issues or pressure government actors to hold humanitarian actors to account to their planned activities, thus indirectly contributing to holding humanitarian agencies accountable against their objectives and planned activities.[7] The government in Somalia plays a key coordinating role for humanitarian projects, thereby providing it with some capacity, information and power over humanitarian agencies versus CSOs.

Therefore, in addition to the lack of consensus among humanitarian actors about accountability, different reference points for accountability exist among media, government and CSOs. Each humanitarian agency tends to use its own framework and approach, which have been developed internally by the organization. Therefore, they are not initiated by the affected community. The immediate context for their approaches to accountability, and related initiatives, is the organization and its view of the community.[8]

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5   Interview with CSOs representative, 21 January 2024.

6   Interview with individual expert, 18 January 2024.

7   Interview with a government official, 22 January 2024.

8   Virtual interview with individual expert, 21 January 2024.

5. **Across diverse organisations' efforts, accountability initiatives are visible but insufficient in practice**. Shifting from their views on approaches to accountability to its implementation in practice, interviewees identified a gap in the level or state of accountability within Somalia's humanitarian landscape. While accountability measures are present, interviewees concluded that they are not being fully implemented to the desired standard. For example, several pieces of legislation designed to ensure that accountability exists, but they are not fully utilized, and some are only partially incorporated. Additionally, although Somalia's Ministry of Planning, Investment and Economic Development (MoPIED) has developed a monitoring and evaluation policy and framework, each humanitarian agency and donor has their own internally drafted policies and frameworks. Lastly, the affected communities and aid recipients' roles and input are missing in drafting these standards and measures whether they were directly engaged or represented by CSOs or the government. So, the absence of the majority of these elements shows that there is a huge gap in the expected and actual level of accountability.

6. **Humanitarian agencies and donors play a central role in shaping the landscape of accountability initiatives**. Consistently, our interviewees took the view that donors of humanitarian aid are the main shapers of accountability in Somalia. The policies of humanitarian agencies were determined by interviewees to also inform accountability relations.[9] Interviewees acknowledge that the FGS has begun to take on a bigger role in holding humanitarian agencies to account in recent years. For the CSOs and media outlets, their role remains limited.[10] Aid recipients and local communities were not seen to initiate any of the major programmatic accountability efforts.

    Respondents' observations describe the current state of accountability in Somalia. They underscore how it is dominated by the donors and the implementing agencies, both of whom they felt should be held accountable by local stakeholders. The dominance of humanitarian donors and implementing agencies also was seen to help explain why humanitarian accountability frameworks and approaches are not locally driven and do not reflect the local context. The FGS' rudimentary role in stepping up to fulfil its part in humanitarian accountability seems to be taking place alongside economic and security progress that is currently being made. The government's preoccupation with security means deprioritisation of other areas, including humanitarian accountability. Security still seems a key priority, but interviewees acknowledge there is more scope to focus on other key sectors.

7. **Affected communities and aid recipients don't have a clear idea on what accountability may achieve or entail in the humanitarian context**. Throughout the course of the study interviewees didn't state or explain an accountability process they would prefer to see being implemented instead of the current approaches. There were no indications given of any form of detailed approach to accountability that starts from the local affected community and goes up towards the humanitarian actors. The interviewees' observations

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9   Virtual interview with individual expert, 21 January 2024.

10   Interview with individual expert, 14 February 2024.

were limited to either explaining or critiquing the current existing accountability initiatives without the suggestion of alternative methods. This situation signifies the lack of understanding of humanitarian accountability and the absence of locally suggested humanitarian accountability initiatives among Somali actors. It also emphasises that it is indeed the donors and implementing agencies that shape and dominate the humanitarian accountability landscape and that existing frameworks are not derived locally.

In summary, although policies and regulations exist, there is no consensus on their application, and they are not fully utilized. Monitoring and evaluation phases are included in each aid process but are often treated as formalities and tick-box exercises. Moreover, accountability is not driven from the bottom up or locally, such as from CSOs or the government in general. The lack of consensus on accountability among humanitarian actors and Somali stakeholders, along with the other issues mentioned in this sector, contribute to poor understandings of accountability. Projects operate within different accountability frameworks and approaches, which vary by organization. This becomes even more confusing for the general public as these frameworks and approaches are communicated in ambiguous and unclear ways. With this, the accountability frameworks used by humanitarian organisations are not initiated by the affected communities, that are not locally initiated, which also shows the absence of the locally led initiatives. Furthermore, CSOs, local media, and government each have roles to play in promoting accountability to the Somali public, and to crisis-affected communities, but thus far they appear inactive in initiating efforts that enable holding humanitarian agencies to account. The rare cases that exist where this does occur seems to be within the context of accountability of humanitarian agencies to their donors. Finally, Interviewees critiqued current accountability processes but offered no alternatives, revealing the lack of local understanding and initiatives in humanitarian accountability and the dominance of international actors in the sector when it comes to accountability initiatives.

Accountability-related work of the different stakeholders

Box 2 Key Messages:

- CSOs have a limited role in humanitarian accountability, mainly involved as part of 'third-party' monitoring efforts to assess project implementation for humanitarian agencies and donors, along with a few other isolated efforts. Despite the limited capacity, resources, and understanding among CSOs, there are still some initiatives that can be further improved and supported.

- Local media contribute to humanitarian accountability by focusing mainly on reporting crises and aid distribution, while lack of media freedom, financial constraints and skill gaps further limits their role. Also, dedicated local humanitarian media outlets are required.

- Government institutions have started to play a greater role in humanitarian accountability through policy development and initiatives aimed at greater transparency. However, implementation requires improvement, and monitoring and evaluation processes need to be made stricter.

There are different roles and work related to accountability that different local stakeholders – the CSOs, media, and the government – are involved in to promote accountability. Focusing on the different roles they play, we separately analysed the work of civil society organizations, media, and the government.

Civil Society Organizations

CSO face multiple internal and external challenges that limit their effectiveness in accountability efforts. Still, we did identify some innovative efforts by CSOs to provide different channels for Somali communities to have a voice to policy makers about humanitarian activities. One of the notable CSOs' work we came across in enhancing accountability and community inclusion is the Daadihiye Citizen Engagement Program launched in May 2023. This initiative was designed to bridge the gap between policymakers and the Somali populace. By amplifying citizens' voices and providing them with a platform to participate in decision-making processes, the program seeks to reduce the distance between the governing elites and ordinary citizens, fostering a more inclusive approach to governance. The program uses several approaches and methods to engage with citizens, including field research, interactive radio talk shows, hotline numbers, dialogue/community forums, in-depth conversations with policymakers and practitioners, and online interactive dashboards (Raagsan 2023). The focus of this program's engagement with the community is to enable community oversight of the state of service delivery in Somalia. The FGS currently lacks the capacity and ability

to effectively deliver services across the country, with developmental and humanitarian organizations filling gaps in public service provision. The program also contributes to raising the citizens' awareness and understanding concerning their rights. The Daadihiye program serves to maintain a two-way communication structure, informing and educating the citizens while hearing and receiving feedback.[11]

A key aim of this program is to provide information to citizens about the state of public services. The information in Somalia is often limited and is in the hands of few individuals affiliated with institutions. They are present in almost every workshop or consultation meeting continuously and they are the only ones talking about recurrent issues all the time. So, the program aims to present these discussions in wider and larger circles instead of smaller and closed ones dominated by a few people. Lots of information comes out here, which is supposed to be used for pushing and demanding accountability.[12]

The interviewees talked about the complexity of the work involved in enhancing accountability. *"We utilize different tools which are verified by our contractors, and they are not happy with us using unconventional ways of trying to dig out problems and issues to enhance accountability,"* said one of the interviewees who works for a local organization that undertakes Third-Party Monitoring (TPM). He stated that they are advocating for the integration of two key initiatives into the TPM systems. The first initiative is a call centre designed to encourage communication from individuals hesitant to speak directly in front of the implementing agencies or local Non-Governmental Organisations (NGOs). This is part of what he called a '70/30 approach', in which 70% of work they do in person, with the remaining 30% conducted remotely to gather potentially differing insights due to reduced pressure from on-site factors.[13]

Alongside this, they have started organizing community forums, longer sessions held in a welcoming environment at their office, designed to make participants feel comfortable and more inclined to share their experiences throughout a 6 to 8-hour workshop instead of Focus Group Discussions (FGDs). The interviewee explained that FGDs are limited in their effectiveness in engaging vulnerable groups, who may lack the skills or confidence to express themselves in such settings. These community forums also circumvent the influence of implementing agencies and gatekeepers present in field settings, ensuring more genuine feedback. During these forums, illustrations are used to clarify concepts and processes, making the information more accessible to those unfamiliar with the system. This method aims to foster an open dialogue, enabling us to extract valuable insights from participants.[14]

Beyond more isolated examples such as the above efforts, we identified few, tangible and independent initiatives by CSOs to promote humanitarian accountability. Instead, more common, we found that CSOs are involved in accountability efforts as subcontracted entities involved in third party monitoring activities, in other words, monitoring and evaluation projects whereby humanitarian donors and agencies contract independent entities—private or NGO—to collect and analyse data, ensuring verification and accountability in program

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11   Interview with CSOs representative, 17 January 2024.

12   Ibid.

13   Ibid.

14   Ibid.

implementation in insecure environments. The aim is to use firms external to the humanitarian sector and/or project to provide an impartial, independent evaluation separate from both the implementers and funders of humanitarian activities (Diepeveen et al. 2022).

The community engagements in TPM are based on those particular humanitarian projects being evaluated, for instance, the community's expectation from the project and understanding as this is an important element when it comes to the implementation and evaluation of the humanitarian aid. The different engagements these CSOs have with communities working as TPMs are based on the projects they evaluate and specifically on promoting accountability. One of the respondents said *"We have different engagements with the local communities, and it depends on what we are working on at that time and not specifically on accountability. Mainly we interview them on their awareness and perception of that particular project."*[15] Other respondents stated that they don't work on promoting humanitarian accountability as it's currently missing from their work.[16]

The abovementioned example provides insights in ways that CSOs can be limited in promoting accountability. CSOs work in TPM for the donors or, in numerous cases, for the implementing agency as a way of making profit and running their organization. Their work has not necessarily centred on holding the humanitarian agencies to account on behalf of local communities. Instead, this example shows how they might operate under the rules of the donor's accountability policies to ensure that their funds are utilized accordingly. While holding humanitarian agencies to account as part of third-party monitoring creates a layer of accountability, e.g. as part of donors' evaluation efforts, the local element is missing from these efforts: CSOs are not representing the affected communities and aid recipients in this way but rather they are checking and verifying whether implementing agencies adhered to the donor's policies and fulfilled their requirements. They are bound to comply with the donors' objectives and methods. Moreover, a wider diversity of roles that CSOs can play in relation to accountability in society is missing, for instance, they have little space, capacity or resources to advocate, raise awareness, lobby, pressure, and hold humanitarian organizations accountable for the betterment of the aid and service for the wider community. The absence of such CSO roles is due to the lack of capacity, resources, and understanding of the humanitarian accountability concepts.

The Daadihiye program provides one approach to countering the neglecting of affected communities' – and the wider Somali public's - perspectives on the state of humanitarian intervention and accountability, as well as the government services in general for better community engagement and inclusion in the accountability processes. In this sense, the program could address the lack of local perspective in accountability processes as well as contribute to and strengthen the view that accountability should be initiated from grassroot levels. The programme was piloted in several districts in Mogadishu, but it's only limited to Raagsan consulting, and is not widely adopted elsewhere in Somalia. It also lacks the reach and access that a government-initiated programme might have. Also, without the introduction of such programs to the TPM methods as well as the accountability frameworks, it won't make much difference as it will need the support of the different actors in the humanitarian sector for it to be adopted and used as an engagement tool on a larger scale.

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15   Interview with CSOs representative, 21 January 2024.

16   Interview with CSOs representative, 27 January 2024.

These accountability practices by CSOs can be connected to the different perspectives and views on humanitarian accountability stated earlier. The Daadihiye program for example shows that there is an attempt on centring accountability initiatives on the affected communities and aid recipients similarly to the AAP agenda and the flagship initiative efforts. On the other hand, the CSOs' role as TPMs shows the existence of a layer of accountability that is serving primarily the donors or implementing agencies instead of the affected communities and aid recipients, which strengthens the argument that donors and implementing agencies are dominating in shaping the accountability landscape. Both examples indicate the existence of insufficient accountability initiatives. Ultimately, the absence of key CSOs roles to hold humanitarian actors accountable on behalf of the affected communities also signifies that there is lack of awareness and understanding in the CSOs when it comes to humanitarian accountability.

Media

During the military regime (1969-1990) led by Mohamed Siad Barre, media was under state control. However, after 1991, private media began to emerge. Many new media stations, especially radio stations, were established as business ventures and as means for political propaganda. In recent years, there have been modest efforts to regulate the media sector. However, obtaining reliable data on Somalia's media sector is still challenging due to the lack of a centralized database and updated information from authorities. Today's media environment is diverse in terms of formats, with radio remaining the most influential medium. Television is mainly limited to urban areas, while print media is declining. The last decade has also witnessed the rise of the internet, propelled by the widespread use of mobile phones, leading to a surge in social media usage, particularly among the youth. Despite this, internet access is still relatively limited among the Somali population, and greatest access is primarily in urban centres (Ahmed, Monzani, and Sustersic 2023).

The role of the Somali media including local radio stations, TVs and independent journalists in humanitarian accountability is almost non-existent, at least based on the responses from the study participants. One of the respondents said, "*Our Somali media outlets aren't prepared for the process to hold humanitarian organizations accountable*". Interviewees shared several reasons for this lack of presence. First, the local media outlets very heavily focus on reporting on the politics of the country at the expense of other important issues. Second, it's not in the objectives of media outlets to report on humanitarian issues as well as accountability matters. Thirdly, the staff of these media outlets don't have the capacity, training, and skills necessary to investigate humanitarian work and initiate efforts to hold these organizations accountable.[17] This is further backed by the Agency for Peacebuilding's report which points that the media's content is deeply influenced by politics, marked by competition and corruption. Politicians often own media outlets, using them to apply political pressure and mobilize constituents, with state media subsidies distributed opaquely, favouring pro-government outlets. The report further indicates that the financial instability in the sector forces many to leave the profession, compounded by a lack of professional training and capacity building due to the scarcity of institutions providing university-level degrees in media or journalism and most

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17   Interview with journalist expert, 28 January 2024.

professional training, typically short-term and offered by UN agencies or international NGOs depends on the availability of funding (Ahmed, Monzani, and Sustersic 2023).

There is a lack of journalists in Somalia who could report on humanitarian issues. The handful of journalists who were identified by interviewees as being open to discussing and reporting on humanitarian issues face challenges including limited information, a lack of focus in their reporting, and the need to work with the media outlets' priorities, which determine the extent to which they might cover humanitarian interventions. Often, also, journalists noted they do not receive approval and access from influential government contacts and owners of media outlets to report on these issues.[18] According to the Somali Mechanism for Safety of Journalists' (SMSJ) recent annual report (2023), there has been a rise in complaints from journalists, online reporters, and camerapersons regarding difficulties in accessing information. These challenges include obtaining access to key areas including government institutions, events, disasters including humanitarian flood coverage, explosion attack coverage, public protest and demonstrations against federal government and regional states in Somalia, including Somaliland. Additionally, from 2022 to 2023, there has been an increase in the number of detentions and media crackdowns (SMSJ 2023).

Humanitarian agencies were noted to have internal measures to ensure accountability, but often they excluded and prevented the involvement of local media outlets and journalists in these activities. Media outlets do not have the necessary and sufficient information on humanitarian issues to report on it and contribute to holding humanitarian agencies accountable, claimed one of the interviewees.[19]

Interviewees from local media further underscored that the media's contribution in shaping the public discourses on humanitarian accountability is limited by negligence saying that the Somali media had not reached that level of influence and effectiveness.[20] Local media outlets do contribute to humanitarian affairs in reporting on disasters, droughts, floods, and in general, the humanitarian need for support in areas where there are affected people. One respondent said, "*We go to the areas where the affected people settle and report on these people's situations, problems, and needs in the manner of telling stories*". After these stories are prepared and affected people are given the chance to amplify their voices, the media outlets release the stories to the public. The interviewee also said: "*The story goes public without naming the organization that is working there but only mentions that there is a humanitarian organization that shown negligence to these people, and we let the people name the organization*".[21]

The practices described above show that the media's role in humanitarian issues is not entirely absent. Reporting on disasters and the needs of affected communities through storytelling can offer a platform for amplifying the voices of those in need. Yet, it has been limited. Reluctance to name specific organizations involved in negligence dilutes the potential impact of these reports on accountability. This is shaped by wider political economy factors in Somalia, which will be further discussed in the following section. This practice also reflects a limitation on

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18   Interview with media representative, 20 January 2024.

19   Interview with independent journalist, 10 January 2024.

20   Interview with journalist expert, 28 January 2024.

21   Interview with media representative, 18 January 2024.

media influence and effectiveness in Somalia. Furthermore, the respondents believed that the media could make a lot of difference in humanitarian accountability.

However, there is a profound disconnection between the media's current role in humanitarian accountability, and the potential role they could have within the Somali context. Despite the critical importance of the media in scrutinizing and holding humanitarian organizations accountable, we didn't find any local media outlet that focuses mainly on humanitarian accountability. Several systemic barriers hinder this function. First, the emphasis on the political news aspect is due to the audience, as the Somali local media outlets are owned mostly by individuals and established for profit. This has resulted in a neglect of humanitarian accountability as it is believed that this won't attract a wide audience to tune in to listen or watch. Second, the capacity of local media outlets is limited to reporting hard news, and humanitarian accountability reporting needs more skills particularly in investigating hidden issues, fieldwork, and spending more time searching for information. Such skills are lacking among local media outlet staff and with that being the case, accessing information is an additional challenge.

In contrast to the presence of a few CSOs' existing accountability practices, interviewees attributed local media outlets' extremely limited role to the dominance of donors and implementing agencies in the sector who have a relationship with the government, whereby some officials are either owners of these media stations or have connections with the owners. This political economy dynamic is the major issue limiting the media's role coupled with lack of awareness and understanding of accountability.

Government

Somalia has struggled significantly in key aspects of good governance, including the rule of law, government effectiveness, political stability, public participation, accountability, and transparency. Since re-establishing the third republic in 2000, Somalia has made only marginal progress in promoting good governance. It consistently ranks among the most corrupt and least transparent nations globally, failing to foster a political environment conducive to accountability and public trust in governance (Muhumed, 2021).

Nonetheless, the government has played a more visible role in recent years in coordinating and leading responses through the Somali Disaster Management Agency (SoDMA) and the early appointment of a drought envoy. Additionally, specialized ministries and focal points have been established for critical areas such as durable solutions (for displacement), disaster management, and stabilization, with dedicated envoys for drought and stabilization also being appointed. Government presence at the state and district levels has increased. Nevertheless, ongoing political rivalries and competition over resource distribution between the government and certain federal member states continue to impact their involvement in crisis management (Hailey et al. 2023).

Despite the modest progress in the past decade and the creation of various public institutions, these public entities remain weak, insufficient, underperforming, and in need of enhancement. The country's fragile economic foundation and the poor leveraging of international aid further hinder resilience and governance improvement. Local capacities remain underdeveloped

("SJHR'S Position on Accountability in Somalia" 2016).

There are various government institutions involved in humanitarian accountability affairs. As well as some efforts aimed at enhancing the accountability around humanitarian intervention by the government. The study examined three relevant government institutions where the interviewees pointed out their work in humanitarian accountability.

All development and humanitarian projects are coordinated by the FGS's Ministry of Planning, Investment and Economic Development (MoPIED).[22] Alongside the MoPIED, the Office of the Auditor General (OAG) is tasked with ensuring that government expenditures of taxpayer money are justified and worthwhile. In the context of humanitarian efforts, however, this auditing role differs, as funds involved are not directly sourced from the public but rather from foreign donations or organizational contributions. There are two categories of such donations: those given to the government and managed through its ministries, for which the OAG is directly responsible for verifying their proper use, and those that bypass government channels, directed instead to the Somali people through local NGOs from international donors or executed by multilateral organizations with the initiatives and project designs being their own. The government's role in these instances is limited to coordination. Accountability for these latter types of donations presents a challenge since the government neither provided the funding nor have a hand in the project's design.[23]

The Independent Anti-Corruption Commission is another institution assigned with auditing of funding. However, it is a relatively new entity, having been established in 2021, and its operational capacity has been limited. Its commissioners were dissolved when President Hassan Sheikh Mohamud came to power, due to the flawed legal procedures under which commission was initially established. Despite its potential importance around auditing, it is not functioning, and many policies, rules, and regulations needed to tackle these issues are absent.[24]

In terms of the government's efforts to ensure humanitarian accountability, MoPIED have put in place several policies and frameworks to ensure coordination, transparency and accountability. MoPIED and the Office of the Prime Minister established the Aid Coordination Unit (ACU). It also developed the 9th National Development Plan (NDP9), Monitoring & Evaluation (M&E) policy, and M&E framework of the NDP9. The M&E policy outlines the duties and obligations of government institutions, humanitarian organizations, local NGOs, and CSOs in monitoring, evaluation, and accountability. The M&E framework of NDP9 outlines result indicators framework that assesses the humanitarian and development projects executed within the country, how they align with NDP9, their responsiveness to public needs, effectiveness and efficiency regarding outcomes and expenditures, the impact on the local population of the specific area, and the sustainability of their initiatives.[25]

Every organization operating within the country, whether foreign or domestic, is required to register with the MoPIED. However, local civil society organizations are registered by the

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22   Interview with government official, 11 January 2024.

23   Interview with government official, 22 January 2024.

24   Interview with government official, 16 January 2024.

25   Interview with government official, 11 January 2024.

Ministry of Interior, Federal Affairs and Reconciliation (MoIFAR) at federal level and Ministries of Planning at FMS level. There is a lack of clarity on how NGOs' work is coordinated at FGS level. Currently, the process is limited solely to registration, although it was supposed that each organization submit an annual activity report to facilitate coordination by providing insight into each entity's activities. This lack of a comprehensive reporting mechanism highlights a significant gap in the government's monitoring and accountability efforts. Adding to this, in contrast to other nations, the government does not have the authority to access the bank accounts of international and national NGOs within the country. Being an NGO does not exempt organisations from audits, monitoring, or taxation. A key requirement is determining tax compliance, as NGOs must present a tax compliance certificate quarterly to demonstrate their financial activities. However, this obligation often goes unfulfilled until there is a need to secure funding, at which point organizations navigate the system to obtain a clean record and the necessary tax compliance certificate, leveraging government connections. Consequently, the financial inflows and outflows of these organizations remain opaque.[26]

The government has scaled back its oversight. Funds solicited on its behalf are deposited into the government's treasury-single account and included in the budget for parliamentary approval. This represents a basic level of accountability. However, the practical aspect of verifying the completion and quality of the work is often overlooked, leading to gaps in the system. It is imperative to put more emphasis on the practical aspect of policies, beyond their existence on paper, because several policies remain ineffective and are left only on the shelves. Organizations may be simply unaware of these policies. Accountability should begin with informing organizations about their responsibilities, with penalties for violations, but such measures are not actively enforced.[27]

However, aside from policies and frameworks, MoPIED, in collaboration with development partners, launched the Aid Management Information System (AIMS), which contains information on over 1,000 projects, including project objectives, funding amounts, implementation areas, durations, and implementing agencies. This comprehensive system enables oversight of projects executed within the country. Development partners, embassies, and donors are granted access to monitor and stay updated on the projects they finance. The program is open to the public, fostering citizen engagement by providing visibility of ongoing projects. While the system encompasses most projects, there may be a few that are not listed.[28]

Moreover, the government has set up a coordination mechanism system functioning as a task force for M&E, integrating various levels of government from the FGS to the FMS. It is anticipated that development partners will also participate in this system. The primary objective of this coordination mechanism is to enhance its strength, which will lead to an increase in information and data output, as well as facilitate knowledge sharing among the stakeholders involved.[29]

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26   Interview with government official, 22 January 2024.

27   Ibid.

28   Interview with government official, 11 January 2024.

29   Ibid.

The government is contributing to enhance accountability at least in terms of the development of policies and frameworks rather than putting more focus and emphasis on their implementation. The proper implementation of these efforts is missing or at the very least isn't effective. It seems that these policies are developed for formalities and are often superficial. The government's limited capacity and resources also pose an obstacle to fulfilling their role and they remain focused on the security concerns, leaving the other sectors to the private companies and humanitarian and developmental organizations. Leaving such roles at the hands of different non-governmental entities limits the government's role in keeping up with what's going on and its ability to hold the humanitarian actors accountable for the work they do.

The AIMS can help in enhancing accountability by making ongoing projects transparent. Yet its success hangs on the proper actions taken based on the data it makes available. Also, the inclusion of the remaining projects is a prerequisite. The accuracy of the data it presents will be a major factor in detecting misuse of funds as it's crucial for this system to contain credible information. Currently, the systems are limited in tracking and transparency; the main users are the developmental partners, donors, and government. The AIMS access for the public is limited although it provides basic information on ongoing programmes and projects.

The government's work in humanitarian accountability, in general, is much more extensive than the CSOs and the media combined. This is not surprising given that the law mandates the government engage in some efforts. Further, the government has greater capacity, resources, and ability. Despite this, the government isn't at the desired level here due to expectations around what it could potentially deliver with proper action, political will and commitment.

Linking the government's efforts back to the views and perspectives on accountability initiatives we can conclude that there are some insufficient accountability efforts including the AIMS system and unimplemented laws, frameworks and policies. The dominance of donors and implementing agencies in the humanitarian accountability landscape is evidenced by the government's dependence on them for funding monitoring and evaluation processes. There is a lack of awareness and understanding of accountability, but the abovementioned issues are more influential factors.

Collaboration and coordination among stakeholders

> **Box 3 Key Messages:**
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> - The need for and importance of collaboration and coordination among different stakeholders was recognized across interviewees, but they could not identify any promising indications that such engagements will occur at the desired level soon.
> - Collaboration between government and humanitarian agencies is more prevalent relative to their engagement with CSOs and local media outlets.
> - Our interviewees suggested that collaborative arrangements across stakeholder groups to ensure and enhance accountability is limited within the projects and don't extend beyond them.
> - CSOs and local media outlets want to initiate collaborative engagements with the government and humanitarian agencies but in terms of capacity and authority they are unable to do this.

According to a CSO representative interviewed, their engagement with the government is focused on conducting monitoring, evaluation, and accountability of current projects on their behalf since these government institutions often lack the requisite capacity and resources. The focus of such collaboration varies depending on the program's emphasis and is not particularly focused on promoting humanitarian accountability. This is also applied in their interactions with implementing partners, agencies, and donors. Their engagements with the media are minimal, primarily focusing on providing them with capacity-building training. This engagement aims to use the media as a channel for information dissemination and to invite them to events.[30] Another CSO representative contributed and said: "The media is already part of us (CSO), but the other stakeholders with whom the direct engagement was required isn't established yet as there is a slowdown in that and lack of trust"[31] In this regard, there is a lack of collaboration and coordination among these stakeholders. The CSOs might be contracted to undertake monitoring and evaluation for the government or NGOs, representing a simple transaction of service and compensation for doing that work.

Collaboration and coordination among various stakeholders, including the media, government, and international organizations, regarding accountability in humanitarian interventions is virtually non-existent. The media is not equipped to handle accountability issues in this area and has not established cooperative relationships with other entities. Similarly, there has been no concerted effort from the government or international organizations to enhance

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30   Interview with CSOs representative, 21 January ,2024.

31   Interview with CSOs representative, 27 January 2024.

collaboration. The lack of preparation by the media, combined with the government and international organizations' failure to prioritize or plan such initiatives, means that potential feedback and accountability mechanisms involving different stakeholders have been overlooked and undeveloped.[32]

In line with this, one journalist said "*It seems that there is a missing role there. The media has a relationship with CSOs as they deal and talk with them on what they are doing. Also, the media deal with the government separately. But the missing role is the collaboration and coordination among all these actors collectively in promoting accountability in humanitarian related issues*".[33] Another media representative interviewed reiterated this from another point of view and said "*All of these stakeholders you mentioned fear the media because they think if media comes into the picture, there will be exposure and uncovering. So, there is no collaboration and coordination*".

The only time the media are engaged is when there is aid distribution, as the interviewee said:

> "*The humanitarian organizations and government may only call you when they are trying to deliver some aid as they want to be seen doing so but nothing about accountability we are contacted for or collaborated with. With the media, we work together to strategize on the best ways to report and communicate the issues and challenges faced by affected individuals to the public. Regarding CSOs, our interaction is limited to them seeing our outputs concerning the topics we address; beyond that, there is no direct collaboration among us.*[34]

Looking at the government's perspective, in the design phase of humanitarian projects, the role of CSOs in consultations is nominal and lacks genuine impact. Consultation reports are often pre-prepared, aligning with the preferences of humanitarian organizations rather than being influenced by CSO feedback. Objections raised during meetings do not lead to any real changes in project design, rendering these consultations superficial. As a result, these interactions do not yield significant policy or design modifications, essentially serving as procedural formalities and a ticked checklist without substantive collaboration.[35] "*The government has collaboration and coordination with international actors in comparison to the CSOs and media which most of the time don't exist*" claimed one of the interviewees as the media, which is part of the CSOs, lacks sufficient awareness about accountability in humanitarian efforts. While they might hold a minister to account, they do not apply the same scrutiny to humanitarian projects or activities.[36]

Based on these responses, we've found that there were no tangible collaboration and coordination efforts among stakeholders when it comes to accountability in general and humanitarian accountability in particular. There were some collaboration and coordination efforts among these stakeholders in other areas such as planning and implementation phases, at least on paper. However, these were also superficial. Having collaboration and coordination among these stakeholders depends on the improvement of each stakeholder's role and efforts in promoting accountability. The mechanisms and the avenues for such engagements aren't in

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32   Interview with expert journalist, 28 January 2024.

33   Interview with independent journalist, 10 January 2024.

34   Interview with media representative, 18 January 2024.

35   Interview with government official, 22 January 2024.

36   Interview with government official, 11 January 2024.

place or at the very least the ones that exist aren't effective. In the end, nothing can be expected when neither side bring much to the table.

However, in the course of the interviews, despite the apparent absence of effective collaboration and coordination, all the respondents underscored the importance and necessity of having collaboration among all these stakeholders and its contribution to promoting humanitarian accountability. This unanimous perspective itself is something that can be a foundation to build on since there's an awareness on the importance of the potential collaboration and coordination among the government, media and civil society on humanitarian accountability in Somalia. Despite this promising indication, in Somalia the pursuit of personal interests often prevails over the pursuit of the common or public interest. Unless each side sees their own interest and incentive in such collaboration and coordination, it would be hard to achieve a meaningful cooperation as the first question will likely be "what's in it for me?". This is evidenced by the widespread rampant corruption practice in the country, which is facilitated by the norm of kickbacks and collective collusion between politicians and their allies in other sectors including humanitarian and private actors. Unless the weak and corruptible governmental system in Somalia is repaired or dismantled and replaced with a more transparent system, anyone who finds themselves inside that system is likely to be compromised as it's unhealthy environment that has persisted through the years due to the culture of impunity in the country.

Political economy dynamics of potential humanitarian accountability initiatives in Somalia

Box 4 Key Messages:

- Our interviewees suggested that corruption and conflicts of interest within the humanitarian sector across different stakeholders hinders accountability initiatives.

- Interviewees indicated that government contracts tend to be awarded to organizations owned by former or current politicians, preventing fair procurement processes, and, subsequently, accountability.

- Media outlets face multiple restrictions and pressure. Widespread insecurity deters potential whistleblowers from exposing corruption, and a lack of job security compels journalists to comply with media owners' decisions. Also, a lack of information hinders investigations.

- Humanitarian agencies seem to seek to avoid being impacted by domestic political economy dynamics, aiming to implement their projects regardless of the nation's overall situation.

- Across the sector, financial dependence, personal interests, and the absence of robust enforceable policies and regulations are primary political economy factors limiting humanitarian accountability to crisis-affected people.

This section explores the political economy of humanitarian accountability, considering the ownership of humanitarian projects, relationships among people involved (including government officials, executives of implementing agencies, CSOs, media outlets, and TPMs) in terms of conflicts of interest, corruption, and conflict zone dynamics in the country. We assessed the influence and impact of this political economy on humanitarian accountability efforts of the different stakeholders in general and within the government, media, and CSOs in particular. Our interviews revealed the existence of these political economy dynamics and their significant and negative impact on the accountability initiatives in the humanitarian sector, and their hindrance or blocking of the different stakeholders' efforts to promote humanitarian accountability.

The relationships of CSOs with government and humanitarian agency institutions and their leadership significantly, and often negatively, impact accountability. One interviewee argued that they conducted research on the relationships within an organization, particularly in procurement departments and among directors of subcontracted local NGOs, which revealed familial ties, including relatives by marriage. These insiders establish local NGOs, assigning them to their relatives to secure contracts through insider information, leading to conflicts of interest. This practice raises the question of recourse for the communities served when they

have complaints, as they end up addressing their concerns to the very agencies connected to the local NGOs or companies involved, thereby undermining accountability.[37]

 In other instances, an individual running a project may have connections with influential figures such as ministers or members of the parliament, complicating accountability efforts. Exposing misconduct could jeopardize CSOs' freedom to operate within previously accessible environments. Additionally, instances have arisen where individuals associated with organizations were found to be engaging in corrupt practices and lacking accountability. However, through their connections within the government, these individuals have managed to circumvent repercussions, reappearing in functional roles or even gaining access to government institutions critical to the very CSO organization that reported to challenge them.[38]

 This cycle is driven by personal interests and a lack of responsible oversight, where institutions meant to enforce accountability were seen to be complicit in misconduct due to their vested interests, as further stated the interviewee.[39] One of the interviewees argued that CSOs in Somalia, who are expected to serve as a counterbalance to government power and advocate for the public, often act as government mouthpieces. Their effectiveness is diminished by their lack of independence and failure to represent broader community interests. This undermines their potential positive impact.[40] Another interviewee further argued that CSOs lack capacity, primarily due to poor leadership and interest to make money despite being non-profit institutions. Many individuals lead these CSOs for limited, profit-oriented reasons, without adequate resources. When seeking resources, interviewees explained that CSOs often turn to the very implementing agencies they are meant to hold accountable, representing a conflict of interest as they cannot criticize the sources of their funding. This compromises accountability. Additionally, the security issue and the overall situation in the country pose risks to outspoken members, deterring active engagement. While addressing these issues requires collective action from many actors, as the efforts of just a few individuals are unlikely to lead to meaningful change.[41]

 Shifting to the media, here, interviewees explained how private media outlets in Somalia often reflect the interests and agendas of their owners, who establish these platforms primarily for profit making or political ambitions as they use their platforms to establish themselves politically through maintaining relationships with politicians. When such media outlets attempt to undertake accountability measures that may challenge their owners' interests, the owners can swiftly intervene. They can prevent the publication of such content or remove it from their platforms shortly after it has been posted. The interests of nearly all locally owned media outlets are closely tied to maintaining good relationships with the government and various organizations. This reliance on connections means these media outlets are often unwilling to report on any misconduct, negligence, or corruption within these organizations. Whether these relationships are overt or covert, the priority is to protect their interests,

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37   Interview with CSOs representative, 17 January 2024.

38   Interview with CSOs representative, 21 January ,2024.

39   Ibid.

40   Interview with government official, 22 January 2024.

41   Interview with CSOs representative, 17 January 2024.

leading to a hesitancy to publish anything that could potentially damage these alliances.[42]

Interviewees stated instances where journalists have produced stories critical of the government only to be reprimanded by their superiors. Similarly, if a media owner has personal relationships with humanitarian organizations, coverage of issues related to these organizations is likely to be omitted. Journalists frequently express that their ability to report on accountability is hindered by the editorial control exercised by their superiors, who approve or veto their work based on their interests and affiliations. This issue is prevalent in media operating in Somalia, where there is a lack of established policies or strategies for media operations, leaving content decisions entirely in the hands of the editors and owners.[43]

A (2020) report by Amnesty International reveals that the Somali government was censoring the media by bribing media owners and directors to suppress and not publish negative stories. This bribery was aimed to secure favourable government coverage. Journalists interviewed by Amnesty revealed that this practice has severely limited their freedom to report on sensitive issues, as editors often discard such stories before they are aired or published. Editors reportedly admit to being paid off by the government to their subordinate journalists to enforce self-censorship. Consequently, several journalists had to resign to work for other uncompromised media outlets that were reportedly not on a government payroll, while others were fired by the media owners after they refused to self-censor. This is due to a demand from government officials to fire critical journalists from certain media outlets. Amnesty International documented four cases of journalists fired by their employers for defying censorship orders (Amnesty International 2020).

To navigate this, an interviewee said that their reports may vaguely reference the humanitarian agencies by saying "*a humanitarian agency working on area XYZ*" allowing individuals from the local community where that humanitarian agency was operating to specify names during their interviews. However, similar challenges to referencing and mentioning responsible entities arise even with this approach when dealing with both government and humanitarian entities. This issue significantly hinders journalistic freedom and accountability practices.[44]

Therefore, interviewees consistently provided a picture of the Somali media landscape as one that is shaped by political agendas, with outlets profiting from promoting politicians or discrediting their rivals, rather than from traditional advertising revenues. The sector also grapples with security risks and limited capacity to investigate large projects or organizations critically as journalists risk their safety and life. Even if they do and face challenges or conflicts, no one will help them. Also, necessary information for reporting these issues is deliberately kept from them by government and humanitarian organizations. Despite these challenges, there are still vocal individuals and groups committed to transparency and accountability. However, the gap between the current level of engagement and what is needed to effect meaningful change remains significant.[45]

In light of the local media outlets' political economy barriers, we looked into the role of

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42   Interview with expert journalist, 28 January 2024.

43   Interview with independent journalist, 10 January 2024.

44   Interview with media representative, 18 January 2024.

45   Interview with government official, 22 January 2024.

international media. The key advantage international media have over local ones is greater freedom, though both face similar security challenges.[46] Despite this advantage, international media do not play a significant role in holding humanitarian organizations accountable within Somalia. Although they have correspondents in the country, they have not conducted in-depth investigations into aid distribution to communities, suggesting a shared responsibility in the media's overall failure to scrutinize humanitarian operations closely.[47] Also, their coverage primarily focuses on major news rather than accountability issues related to humanitarian aid with them being able to cover stories that local outlets might avoid due to security concerns or other constraints.[48]

Looking into the political economy dynamics of Somalia government institutions, one interviewee claimed that numerous humanitarian projects contracted to private companies are owned by current or former MPs, ministers, and directors.[49] A (2022) report by Marqaati, a local anti-corruption NGO based in Mogadishu that advocates for government transparency in Somalia, supports the interviewee's claim. According to the Marqaati report, government contracts are often awarded to political cronies of those in power through a non-transparent procurement process. It was also noted that kickbacks were commonplace, and some officials had allegedly hidden ownership in the companies that received these contracts (Maqaati 2022). This creates a conflict of interest, especially when these officials use their government positions to influence outcomes in their favour, complicating accountability efforts. The irony lies in those responsible for overseeing accountability being the very individuals who should be held accountable, leading to a lack of self-regulation. For instance, a contractor and member of the Somali parliament demanded full payment for only partially completed work, leveraging political connections to pressure for unwarranted financial compensation.[50]

Since it doesn't have a budget for monitoring and evaluating humanitarian projects, the government plays only a coordination role, authorization role or sometimes joint monitoring and evaluation of projects with implementing agencies, using funds provided by these agencies. This approach raises concerns about the impartiality of the M&E findings. Since the agency being evaluated is also financing the evaluation process, there's a perceived bias toward favourable outcomes in the reports. This doesn't imply that all reports are inaccurate, but it suggests a potential conflict of interest where positive results may be expected due to the financial relationship. For true independence in M&E, the government needs to have its own budget for these activities to avoid conflicts of interest and ensure objective reporting.[51]

Furthermore, there is an absence of effective government policies and regulations that challenge project implementation and accountability across the FMS. The federal governance system lacks comprehensive control over the FMS, which prefers to manage its affairs independently. Consequently, entities implementing projects encounter opposition depending on their alignment with either the FGS or FMS, facing hurdles at even regional and district

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46   Interview with independent journalist, 10 January 2024.

47   Interview with expert journalist, 28 January 2024.

48   Interview with media representative, 18 January 2024.

49   Interview with government official, 22 January 2024.

50   Interview with government official, 22 January 2024.

51   Interview with government official, 11 January 2024.

levels. Conflicts and competition among FGS ministries due to unclear roles exacerbate these challenges.[52]

In light of these insights, an interviewee argued that humanitarian organizations operating within the country navigate and take advantage of the political economy dynamics that exist in the country to their advantage, focusing on engaging with influential individuals or clans within specific regions to facilitate project execution, often neglecting the actual needs or benefits to the intended beneficiaries. This approach is exemplified in different regions, where organizations work with dominant clans or influential figures, leading to a lack of genuine accountability within the system.[53]

Moreover, CSOs and the media find it challenging to address these issues due to lack of information, access, and potential repercussions for speaking out. The international media has the potential to spotlight these accountability issues but often prioritizes reporting on disasters over systemic problems.[54]

Ultimately, the widespread dynamics of political economy and conflicts of interest within various institutions in Somalia can be attributed to financial dependence and the pursuit of profit maximization by all parties involved. The issue of private ownership in the media sector stands out significantly, as these entities prioritize profit generation. CSOs are both contributors to and victims of the prevailing political economy and conflict of interest scenarios. They often act as proponents for government institutions and humanitarian agencies involved in these conflicts, yet they also face repercussions when attempting to unveil the malpractices of certain individuals or institutions. Furthermore, the government's lack of stringent rules and regulations to govern political economy and conflicts of interest, coupled with its financial reliance on humanitarian agencies, facilitates exploitation by government personnel. This exploitation encompasses profiting from projects and humanitarian aid, and highlights the need for systemic reform to address these critical issues effectively.

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52   Interview with CSO representative, 27 January 2024.

53   Virtual interview with individual expert, 21 January 2024.

54   Ibid.

The main challenges faced in promoting accountability

The study examines several issues that prevent the effective implementation of accountability initiatives in the country. Challenges are multifaceted and together affect all the different stakeholders in achieving genuine accountability. Here are the challenges inhibiting the accountability promotion:

- **Poor understanding and misunderstanding of accountability by affected communities and aid recipients:** Difficulties attributed to the local community might not necessarily be unsurmountable challenges; instead, they may stem from misunderstandings or a lack of information regarding the program's intended beneficiaries and objectives, which were not clearly understood initially.[55] Affected people often lack the understanding and means to articulate their problems effectively to the media. They question what immediate assistance they will receive in exchange for their interview, as their primary concern is obtaining aid rather than voicing their issues. They believe that sharing their stories will not lead to any significant change. Many also suspect that the media conducting the interviews benefit from their participation, increasing their reluctance to engage.[56]

- **Lack of access to necessary information on humanitarian projects by government, media and CSOs:** Project information is frequently kept confidential, limiting government access and contravening transparency principles. Information that is shared is often minimal and used for promotional rather than transparency purposes.[57] Critical data such as needs assessments, project proposals, budgets, and M&E or TPM reports are commonly withheld due to a general reluctance to disclose operational information. Government officials also struggle to access information in regions beyond their control, where safety risks complicate information gathering.[58] The media faces challenges accessing vital details on government and humanitarian operations due to limited capabilities and intentional information withholding. Despite expectations for humanitarian organizations to share such information for transparency, many fail to comply.[59] It's particularly difficult for the media to access information outside of Mogadishu, especially during disasters and aid delivery.[60] This scarcity of information undermines the effectiveness of government, CSOs, and media in their roles.

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55   Interview with CSOs representative, 17 January 2024.

56   Interview with media representative, 18 January 2024.

57   Interview with government official, 22 January 2024.

58   Interview with government official, 11 January 2024.

59   Interview with independent journalist, 10 January 2024.

60   Interview with media representative, 18 January 2024.

- **Limited capacity, resources, and expertise of government institutions, CSOs and local media outlets:** The government faces a shortage of technical M&E expertise and insufficient expert numbers for effective implementation. Adequate budgeting and mechanisms for M&E are lacking, limiting institutional capacity for comprehensive oversight.[61] Financial constraints limit the media's resources, leading to a lack of necessary equipment and infrastructure. Investigative journalism demands considerable time, resources, and expertise—assets that many media outlets in Somalia lack. This is compounded by the scarcity of journalists skilled in investigative techniques. Furthermore, the financial constraints of these outlets make it difficult to hire experienced journalists, who typically command higher salaries.[62] CSOs also encounter technical challenges and require capacity building to conduct accountability monitoring and effective oversight.

- **The absence of personal and job security in Somali media sector:** Media outlets often sideline humanitarian issues due to high-security risks and threats to employment. With the focus of privately owned media on profit, journalists are pressured to pursue stories that generate revenue, leaving less lucrative humanitarian topics unaddressed. Reporting on sensitive humanitarian affairs risks a backlash from influential figures, potentially leading to job loss for journalists due to complaints from report subjects to media owners. The combination of scarce employment opportunities, a struggling economy, and weak labour laws further discourages journalists from covering humanitarian affairs.[63] Journalists face significant risks, particularly from influential individuals within humanitarian agencies, their affiliates, or the government. These power dynamics create security threats for journalists who attempt to uncover and report on sensitive information.[64] This is because media journalists lack adequate protection.[65]

- **Lack of political commitment and will in promoting humanitarian accountability:** Collective political will is absent among senior government officials.[66] As a result, the government faces significant challenges in enforcing accountability among its institutions responsible for overseeing various projects. Officials often lack preparation, failing to review plans or research adequately, which compromises their capacity for effective oversight. True accountability is undercut by this shortfall in diligence, as officials typically acknowledge projects without critical assessment. Moreover, the commitment to thorough oversight is lacking.[67] Despite instances of fraud in humanitarian programs necessitating decisive actions like agency closures or legal actions, government responses often appear lacklustre, attributed

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61   Interview with government official, 11 January 2024.

62   Interview with independent journalist, 10 January 2024.

63   Interview with media representative, 20 January 2024.

64   Interview with independent journalist, 10 January 2024.

65   Interview with media representative, 15 January 2024.

66   Interview with government official, 11 January 2024.

67   Interview with government official, 22 January 2024.

to limitations in capacity and inadequate resources for thorough investigations and enforcement actions.[68]

- **Absence of Local Community Input and Perspective in the Implementation of Humanitarian Projects:** Government reliance on international bodies for project planning without local engagement leads to solutions that often miss the mark from a local perspective. This results in a disconnect, as projects designed without initial local input face criticism for not effectively addressing community needs. In many cases, the implementers may only attempt short field visits, engaging local communities solely during the implementation phase rather than from the outset. This approach limits the opportunity for meaningful local input and oversight, leaving international organizations as the primary holders of project information, knowledge about issues, actions taken, and their effectiveness.[69] This issue is a major contributor to the lack of access to information for local actors.

- **Humanitarian implementing agencies act as gatekeepers of information and this complicates monitoring and evaluation field visits:** Often, interviewees explained that humanitarian implementing agencies control access to aid recipients through their relationship with local authorities and gatekeepers. This can also cause aid recipients to potentially withhold true concerns due to fear of retaliation, such as losing aid or threats to their safety. This dynamic undermines genuine accountability and positions the implementing agency as an impediment. Additional accountability challenges arise from community power structures – the federal and state government, local authorities, and armed groups – which expect benefits from external entities. Discreet field visits for TPM are complicated by informants and the necessity of cooperating with humanitarian agencies, possibly in collusion with local authorities. Safety concerns further complicate direct engagement, requiring navigational strategies through bureaucratic and security obstacles, including obtaining permissions from local gatekeepers in IDP camps, to ensure monitoring activities can proceed without risking confrontations with local authorities.[70]

- **Overlapping and unclear mandates among various pertinent government institutions in dealing with humanitarian intervention:** There is confusion and conflict over mandates within various government ministries. Despite clear policy descriptions, overlapping claims of responsibility for certain agendas persist due to the country's fragile state. For instance, both the Office of the Prime Minister (OPM) and the MoIFAR consider themselves accountable for areas that have been officially assigned to the MoPIED. Although this conflict is recognized, these entities still partake in coordination meetings.[71] This issue exists due to the competition of these institutions to assert dominance and the economic factor of having multimillion projects under their coordination and supervision.

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68   Interview with CSOs representative, 17 January 2024.
69   Interview with government official, 22 January 2024.
70   Interview with CSOs representative, 17 January 2024.
71   Interview with government official, 11 January 2024.

- **Government's misuse of power over implementing agencies and media in the absence of clear policies and regulations:** Accountability measures are often leveraged for extortion rather than genuine oversight in government. This results in a scenario where institutions or organizations that fail to meet project expectations are coerced into "mutual agreements" as a means of resolving accountability, effectively sidelining genuine responsibility. Compounding these challenges is the absence of adequate legal frameworks and policies that clearly define standards for accountability.[72] Also, interference from the government and humanitarian actors further limits the media's independence. Attempts to control or manipulate the narrative undermine their freedom to report accurately and independently, particularly in urgent situations.[73]

- **A conflict of interest among different stakeholders in the humanitarian sector:** Organizations fund the government or local NGOs to perform M&E on the projects they implemented, leading to potential bias in the findings due to the conflict of interest; evaluators may hesitate to report negatively on those who finance their assessments. Additionally, the organization's familiarity with the local communities they assist allows them to selectively present beneficiaries who are more likely to provide positive feedback, skewing the M&E outcomes. This issue is exacerbated by minimal direct interaction between the government and local communities.[74]

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72   Interview with government official, 22 January 2024.

73   Interview with media representative, 15 January 2024.

74   Interview with government official, 11 January 2024.

The way forward

Reflections on the current state of affairs around humanitarian accountability

Taking into account the perspectives of local media, CSOs and government actors about humanitarian accountability, it is clear that there is no clear consensus about what is required or who should and can do what to improve accountability to affected people. In addition to challenges within the humanitarian sector around realising greater accountability to affected people, we find that local CSOs, local media actors and the wider public have differing understandings and experiences of working towards improved accountability. Ideally, the 'accountability to affected people' agenda affirms the centrality of affected communities as those who should benefit most from accountability efforts, given they are the intended recipients of humanitarian projects.

Ideally, different actors might contribute different means of orienting project design, implementation and outcomes to affected communities' interests and needs. For example, donors could ensure their funds are utilized effectively. Government actors could ensure that the aid is in line with their priorities in their jurisdiction areas. Yet, in practice, we find that a lack of shared understanding of what accountability could mean for affected communities, and political economy constraints facing CSOs and the media outlets, little bottom-up pressure exists in Somalia to push government and donors to fulfil these roles and hold humanitarian agencies to account to the communities they intend to benefit.

Further, a key underlying challenge seems to be the awareness of the general public in Somalia: interviewees identified a general desire for accountability in the humanitarian sector but uncertainty about how to demand it, who to ask, or if processes even exist to facilitate this.[75] Some suggested that aid recipients fear of missing out on the little entitlement they receive if they speak up or the lack of ability to articulate their concerns regarding the aid delivery.[76] This fear contributes to relative silence meaning the diversity of perspectives and priorities of the wider community are not voiced or listened to, and not incorporated in project implementation or design.[77] Even if consultation meetings are held, they are therefore constrained by both project structures and priorities, as well as limitations on what affected communities can, do and are willing to share.

Therefore, in sum, we find that affected communities have little chance to hold humanitarian agencies accountable, without the direct authority or capacity to voice their concerns and priorities, and limitations on the extent to which local media, CSOs and government help to bridge this gap. Government has tended to be more preoccupied with other issues, such

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75   Interview with CSOs representative, 27 January 2024.

76   Interview with CSOs representative, 17 January 2024.

77   Interview with Individual expert, 18 January 2024.

as security and political developments such as elections and constitutional amendment. Its capacity to oversee humanitarian interventions is also limited. Both CSOs and media outlets are also not actively working to promote accountability of humanitarian projects to affected communities, as their incentive-structures, resources and capacity are misaligned to prioritising humanitarian accountability. This paper has aimed to help shed light on how these challenges manifest for CSOs, local media and the government, bringing some clarity about why challenges to humanitarian accountability to affected communities persists and why local accountability actors fail to break out of this cycle of (un)accountability.

What next?

This report presents a challenging picture of current accountability efforts around humanitarian projects in Somalia, with the humanitarian sector focused more on accountability to donors and within project cycles, and with local actors – from government, CSOs to the media – operating within a political economy context that limits their efforts to shift this situation.

Still, we suggest there is scope for each actor to take steps to move towards breaking this cycle. This final section presents a series of recommendations aimed at addressing the study findings regarding the general state of humanitarian accountability and issues faced by different stakeholders in promoting this. The following suggestions separately address different stakeholders involved in the humanitarian intervention practices to promote accountability.

Recommendations for CSOs and local media outlets

1. CSOs and media outlets should seek out opportunities to collaborate and create dedicated time – while noting resource constraints - to raise awareness among affected communities, aid recipients and the wider Somali public about humanitarian accountability. This includes seeking out ways to collaborate to raise awareness about issues like the importance of consent, the unacceptability of mistreatment, and the rights of affected communities. Radio is likely to be a key channel here, as this is still the most accessed media in rural areas.

2. There is a need for progress towards codes of conduct within the media sector, to strengthen its role in promoting accountability. CSOs and local media should establish and enforce effective internal and external code of conduct that disallows any involvement in misconduct and corruption, and promotes principles of impartiality and neutrality – including with government officials and humanitarian agencies. Again, collaboration is likely to be important here, to achieve a stronger voice and capacity towards effective and enforceable codes of conduct, e.g. whistleblower protection policies that encourage staff to report misconduct or unethical behaviour without fear of retaliation.

3. In response to restrictions on journalistic freedom, we suggest that local media outlets can play a stronger role in developing and pushing for internal guidelines and policies to ensure journalists' freedom of reporting on humanitarian issues. Local media outlets should seek out ways to increase their emphasis and focus on covering humanitarian affairs and importance of humanitarian accountability. This means looking for any opportunity to expand attention from solely reporting hard news and politics to include

other important societal issues.

4. In line with their commitment to local communities, we recommend that CSOs increase their attention to incorporating the perspectives of aid recipients and affected communities across their activities, including third party monitoring reports. This requires CSOs to be proactive in advocating for accountability on behalf of affected communities and aid recipients, using their specific roles in monitoring to help in awareness-raising regarding accountability vis-à-vis the government and humanitarian agencies.

Recommendations for government institutions

1. Government institutions should review and ensure the enforcement and implementation of the various policies and regulations that ensure accountability and transparency, as well as addressing corruption that may prevent these policies being utilized. Top ranking officials should show commitment and will to address humanitarian issues effectively and ensure proper project execution.

2. The FGS should review and specify the mandates and responsibilities of the various government agencies, ministries, and FMS institutions that are involved in humanitarian interventions to prevent confusion and poor management due to multiple parties being involved without clear operational guidelines.

3. Government institutions should make public, disseminate and share humanitarian project information, M&E and assessment reports to CSOs, media outlets, and the public. Government institutions should cease media censorship and CSOs pressuring from reporting humanitarian issues. They should maintain open and constant communication with these stakeholders to enhance access to information.

4. Government institutions should investigate contract awarding, procurement, and TPM hiring processes of humanitarian-related projects to ensure a fair and legal procedure free from corruption, conflict of interest and unbiased evaluation. This is to avoid corruption and conflicts of interest, particularly the awarding of contracts to organizations and companies/hiring TPMs owned by current or former high-ranking government officials. The government should also investigate and stop local authorities from intervening and complicating TPM field visits to allow for comprehensive and unbiased reporting. Addressing these issues is crucial for enhancing transparency and accountability.

5. The government should allocate sufficient budget for monitoring and evaluation of humanitarian projects. While budgetary constraints are likely to be unavoidable, adequate and independent monitoring and evaluation is necessary to prevent conflicts of interest, mismanagement of funds, and wider mistrust in the impartiality of their reports.

Recommendations for implementing agencies, donors and AAP practitioners

1. In line with their commitment to AAP, implementing agencies must seek ways to open up access to project implementation information to affected communities and local civil society and media. This can help to build a multistakeholder effort pushing for greater accountability.

2. Implementing agencies should incorporate local perspectives and inputs of affected communities and aid recipients in the implementation stages of projects, working from a nuanced understanding of the local context, and with trusted and accessible means of engagement. This includes bringing representatives from affected communities into consultations throughout the project lifecycle in meaningful ways, e.g. informing design and early-stage decision making. Alongside this, donors and AAP practitioners need to be aware of the limits of consultations, and who might be present (and who is excluded), and investigate perceptions that consultation meetings with affected communities may only represent a partial view.

3. Donors and AAP actors should give greater attention to investigating corrupt practices and conflicts of interest around humanitarian implementation, helping to ensure sufficient resources for promoting transparent and accountable practices. There is an opportunity for them to collaborate with local actors (CSOs & local media) to understand the local context and recognize who holds power, influence, and who genuinely represents the local populace (versus those who are merely profiteering). This is a crucial aspect donors and AAP practitioners need to understand to ensure proper humanitarian intervention and accountability.

4. Donors and AAP practitioners should engage locally trusted Somali experts to advise on humanitarian aid relevance, timing, and effectiveness. This engagement would ensure that humanitarian efforts are truly responsive to the needs of the people, avoiding misallocated aid, resource wastage, increased local conflicts over aid distribution, and persistent regional disparities. Engaging local experts can bridge gaps, ensuring an accurate representation of on-the-ground realities and enhancement of international support.

5. International actors and donors should broaden their capacity-building efforts to include CSOs, local media, and community members and provide training initiatives focused on enhancing community awareness, investigative journalism and involvement in accountability processes. They should collaborate with CSOs, and media outlets to ensure their financial independence for unbiased investigative reporting. Equipping these groups with essential skills and knowledge enables stronger advocacy for community needs. This shift is crucial as training is predominantly focused on government civil servants, which is an area where donors and international actors have underperformed.

6. More fundamentally, our interviewees point to the need for international actors and donors to re-examine their aid approach to Somalia. After decades of humanitarian intervention, this approach appears unsustainable. International actors and donors should shift towards more development-focused efforts, including investing in infrastructure, building capable institutions, and capacity building for local people. Additionally, they should remodel the current humanitarian approach to contribute to the overall development and sustainability and introduce an integration phase in the humanitarian process where aided communities are fully integrated into their societies and contribute effectively.

Recommendations for further research

1. Humanitarian accountability in Somalia remains an under-researched theme compared to the other adequately researched themes/areas. Utilizing the findings of this study along with the limited existing literature as starting points is recommended to expand this theme. Further research would contribute to the development of additional insights that could improve humanitarian accountability practices.

2. Political economy dynamics play a significant role in the management and distribution of humanitarian aid in Somalia. A deeper understanding of these dynamics would facilitate comprehension of the relationships among the various stakeholders involved in humanitarian interventions and clarify each entity's role. This element should be examined more deeply in subsequent studies to enhance the effectiveness of aid distribution and stakeholder coordination.

3. The general lack of awareness and understanding of humanitarian accountability practices and processes among Somali society may present challenges during the data collection phase, particularly with affected communities, aid recipients, and some segments of the public. Additionally, the expectation of potential interviewees (affected communities and aid recipients) to receive compensation for their information may complicate the gathering of accurate and unbiased data. Addressing these issues is crucial for the integrity of research outcomes.

4. Insecurity in certain regions, coupled with gatekeeping by local actors, including local authorities and camp leaders—who often require payments—may hinder the collection of comprehensive data, limiting the conclusiveness of studies. Although partnering with local actors is an option to conduct the study, it does not necessarily guarantee access to accurate information from affected communities and aid recipients due to the aforementioned challenges.

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About Somali Public Agenda

Somali Public Agenda is a non-profit public policy and administration research organization based in Mogadishu. Its aim is to advance understanding and improvement of public administration and public services in Somalia through evidence-based research and analysis.

At Somali Public Agenda, we believe that all Somalis deserve better public services including access to affordable education, healthcare, housing, security and justice delivered via transparent and accountable authorities.

What We Do

Research: Somali Public Agenda contributes to the understanding and improvement of public administration in Somalia through research and analysis on various issues that affect public policies and the provision of public services. SPA regularly publishes research reports, governance briefs, and commentaries (always in both the Somali and English languages) on decentralization, public bureaucracy, and local administration; democratization and elections; financial governance; security, justice, and rule of law; urban planning and land administration; employment; and, education system and health services. These publications often inform citizens, policymakers, practitioners, and international actors on governance and public service issues in Somalia.

Dialogue: Public Agenda Forum is a platform and space for discussions on governance and public service issues in Somalia. The Forum (including Gaxwo & Gorfeyn monthly meet-ups) serves as an avenue for critical examinations of issues of public priorities. Different segments of society including researchers, policy-makers, and practitioners are invited to meet and discuss issues on equal terms. The Public Agenda Forum convenes dialogue with policy-makers and public figures and organizes workshops, policy design sessions, seminars, and book/report launches. Often the findings of the Forum discussions help inform Somali Public Agenda's governance briefs.

Public Service Design: Based on the findings and policy recommendations of our studies, we design public policies, programmes, and projects with the relevant authorities through our SPA Policy Lab. In collaboration with policymakers, public administrators, and the community, we design knowledge-based public services. Before the government invests resources in the policies, programmes, and projects designed, we envisage experimenting with the public service at a small-scale level to test the efficacy of the services designed.

Training: Based on the findings of our research and our co-designing work, Somali Public Agenda through its Center for Learning and Development offers short training courses to contribute to the building of administrative cadres that can deliver public policies and programmes to the community. The Center for Learning and Development's aim is to connect the civil servants, policymakers, and non-profit sector workers with communities and provide administrations with the technical skills necessary to formulate and implement solutions for public service challenges. Moreover, the center offers training to Somali professionals who have the desire and passion to join the public sector as well as professionals engaged in the civil service and non-profit sectors.