

## CHAPTER 4.2

# ACCOUNTABILITY IN PRACTICE

'Accountability is not just a "nice to have"; in situations of acute crisis and shrinking budgets, community voices must drive decisions more than ever before, or we are failing miserably to fulfil our basic humanitarian mandate.'

— International Council of Voluntary Agencies<sup>140</sup>

Emergency Relief Coordinator Tom Fletcher framed the goal of the Humanitarian Reset as 'cutting red tape and bringing decisions closer to households rather than agency headquarters'.<sup>141</sup> To achieve this goal, the humanitarian system needs to put its commitments to accountability to affected populations (AAP) into stronger practice.<sup>142</sup> This means enabling people to influence decisions that affect their lives, protecting their safety, rights and dignity, and preventing sexual exploitation and abuse (PSEA) and sexual harassment (PSEAH) by system actors.<sup>143</sup> During this study period, the system continued to strengthen its accountability architecture, investing in new frameworks, strategies and guidance and technical tools. However, the evidence suggests that these remained overly technical and process-driven. Community-based approaches and independent accountability mechanisms often generated more legitimacy, trust and responsiveness, but they remained peripheral, received comparatively limited investment and were among the initiatives most affected by funding cuts. Consultation with people affected by crisis, and opportunities for them to provide feedback (and receive responses), were consistently associated with more positive perceptions of dignity, relevance, targeting, quality and trust. Investments in PSEAH expanded considerably, yet implementation remained uneven, with persistent challenges around underreporting, weak enforcement, survivor support and organisational follow-through. Similarly, dignity remained the least well-defined element of AAP, despite emerging guidance and increasing recognition of its importance.



## Foundations of accountability

### Evolving frameworks and guidance

AAP is the commitment and process through which humanitarian actors use power responsibly: to take account of, give account to and be held accountable by people affected by crisis. Over the study period, Inter-Agency Standing Committee (IASC) principals reaffirmed AAP as a collective responsibility and committed to delivering on this 'historic commitment' through the implementation and monitoring of collective AAP.<sup>xiii</sup> Building on the work of the previous Results Group 2 on Accountability and Inclusion,<sup>144</sup> the IASC Task Force 2 on AAP (2022–24)<sup>145</sup> supported efforts to strengthen collective AAP, including through the IASC Collective AAP Framework (developed in December 2023)<sup>146</sup> and other practical tools.<sup>xiv</sup>

There were additional investments at the operational, agency and country levels.<sup>xv</sup> The United Nations Office for the Coordination of Humanitarian Affairs (OCHA) leveraged its pooled funds to advance collective AAP, supporting 16 initiatives with US\$8.5 million through Underfunded Window allocations from the Central Emergency Response Fund (CERF). Following the completion of the Task Force's mandate, OCHA established and facilitated a global interagency AAP Working Group to carry forward the work of the Task Force and maintain a focus on collective AAP in operations. However, as highlighted in the *The State of the Humanitarian System 2022* (SOHS), the effectiveness and practical implementation of such tools, initiatives and processes remained difficult to assess.<sup>147</sup>

Inter-Agency Humanitarian Evaluation (IAHE) synthesis findings covering 2021–25 noted AAP to be quite narrowly understood and one of the weakest aspects of IASC responses.<sup>148</sup> Evidence highlighted that large aid agencies often treated AAP as a standalone function and continued to 'mark their own homework';<sup>149</sup> efforts also became increasingly technocratic and siloed from broader humanitarian endeavours.<sup>150</sup>



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xiii The Collective AAP Framework is a tool developed by IASC to enable Resident/Humanitarian Coordinators, Humanitarian Country Teams and UN Country Teams to prioritise actions to strengthen response-wide AAP (see IASC (2024) [https://interagencystandingcommittee.org/sites/default/files/2024-01/IASC\\_Collective%20AAP%20Framework.pdf](https://interagencystandingcommittee.org/sites/default/files/2024-01/IASC_Collective%20AAP%20Framework.pdf); IASC (2022) <https://interagencystandingcommittee.org/accountability-and-inclusion/statement-principals-inter-agency-standing-committee-iasc-accountability-affected-people>).

xiv Other tools include the Results Tracker, Standard Operating Procedures for AAP Coordination and Resource Portal (featuring over 700 resources) (see IASC (2024) <https://interagencystandingcommittee.org/sites/default/files/2024-06/IASC%20Collective%20AAP%20Resources%20-%20overview%203-pager%2013-06-2024%20final.pdf>). IASC's Operational Guidance on Data Responsibility also reflected the increasing integration of AAP with digital systems, data protection and risk management (see OCHA (2023) <https://interagencystandingcommittee.org/operational-response/iasc-operational-guidance-data-responsibility-humanitarian-action>).

xv At the operational level, see: Global Health Cluster (2023) <https://healthcluster.who.int/resources/accountability-to-affected-populations>; and CERF (2024) [https://cerf.un.org/sites/default/files/resources/Guidance%20for%20CERF%20AAP%202024-1%20UFE%20envelope\\_with%20indicators\\_FINAL\\_1.pdf](https://cerf.un.org/sites/default/files/resources/Guidance%20for%20CERF%20AAP%202024-1%20UFE%20envelope_with%20indicators_FINAL_1.pdf). At the agency and country levels, new frameworks included the UN Population Fund's (UNFPA) AAP and Inclusion Framework in the Philippines and the International Organization for Migration (IOM) Yemen's AAP Framework (see UNFPA (2024) <https://reliefweb.int/report/world/unfpa-philippines-framework-accountability-affected-people-and-inclusion-version-july-2024>; and IOM (2024) [https://crisisresponse.iom.int/sites/g/files/tmzbd1481/files/appeal/documents/%5BEN%5D%20IOM%20Yemen%20AAP%202024-2025\\_1\\_0.pdf](https://crisisresponse.iom.int/sites/g/files/tmzbd1481/files/appeal/documents/%5BEN%5D%20IOM%20Yemen%20AAP%202024-2025_1_0.pdf)).



Similarly, OCHA's AAP evaluation found that AAP was reduced to its technical aspects, rather than driving strategic decision-making or course corrections based on community input,<sup>151</sup> and many staff within the UN High Commissioner for Refugees (UNHCR) understood AAP as a one-off annual participatory exercise.<sup>152</sup>

There was some progress on improving collective strategies for accountability. However, an initial attempt to build a collective AAP strategy in Yemen appeared to have lapsed,<sup>153</sup> interagency processes that aimed to strengthen AAP in Ethiopia 'had not produced tangible outcomes'<sup>154</sup> and the system 'took too long' to establish robust collective AAP in Afghanistan, which was weak over the period.<sup>155</sup> An interagency group noted that, time after time, the same barriers hindered progress on collective AAP, including colonial mindsets,<sup>xvi</sup> fear of feedback, threatened mandates, resource competition, power imbalance and tokenism that reduced participation to consultation without influence.<sup>156</sup>

### Community engagement, communication and transparency

The Flagship Initiative, proposed by the Emergency Relief Coordinator in November 2022 and launched in early 2023, piloted a people-centred, agile, locally driven response<sup>xvii</sup> and treated community engagement as a core pillar. Our aid-recipient survey found an improvement in aid providers' communication: 67% of respondents said agencies communicated effectively about plans and activities, compared to 36% in the previous survey for the 2022 SOHS. However, evidence from multiple contexts found inconsistent outcomes. Between one-third and half of people consulted in Ethiopia did not know what assistance they would receive, when, what the selection criteria for receiving aid were or how they could complain.<sup>157</sup> In several operations, people remained unclear about both the services UNHCR provided and the complaints mechanisms available to them.<sup>158</sup> In Ground Truth Solutions' aid perceptions survey in Haiti only 2% of respondents felt they knew how humanitarian money was spent in their community and just 13% understood how targeting criteria were decided.<sup>159</sup>

The 2025 funding cuts halted progress on initiatives intended to support community engagement. World Food Programme (WFP) country offices delayed sharing information about upcoming prioritisation exercises due to fear of

xvi There is no universally agreed or official definition of 'colonial mindset' in the humanitarian sector. Across the literature, however, the term is commonly used to describe attitudes, assumptions and practices rooted in longstanding colonial power relations that continue to shape humanitarian action. These include paternalistic approaches that privilege international actors, expertise and decision-making over the knowledge, agency and leadership of people affected by crisis and local actors, often resulting in the disempowerment of aid recipients and reinforcing unequal power relations embedded in the language, structures and practices of the aid system (see Boffey (2024) <https://www.theguardian.com/global-development/article/2024/may/07/colonial-mindset-global-aid-agencies-costs-localising-humanitarianism-ngo->; and Magendane and Goris (2021) <https://www.partos.nl/en/news/the-decolonisation-of-aid-a-road-of-responsibility-justice-and-democratisation/>).

xvii In November 2022, Emergency Relief Coordinator Martin Griffiths proposed an 'initiative to pilot a people-centred, agile, locally-driven response in a number of countries' to the IASC Principals (see IASC (2022) <https://interagencystandingcommittee.org/accountability-and-inclusion/statement-principals-inter-agency-standing-committee-iasc-accountability-affected-people>). The Flagship Initiative launched in early 2023 as a three-year humanitarian change process in four countries: Niger, South Sudan, the Philippines and Colombia. Somalia also recently joined the process (see Sida et al. (2025) <https://www.unocha.org/publications/report/world/flagship-initiative-second-year-learning-report-april-2025>).



stoking tensions, but this was ‘ultimately unhelpful’.<sup>160</sup> Community World Service Asia’s paper, which drew on the experiences of over 450 aid professionals, found that nearly two-thirds felt uncomfortable with how their organisations handled community communication during transitions, programme closures and staff reductions that resulted from the cuts, leading them to question who was held accountable when communities were left behind, especially in areas affected by conflict.<sup>161</sup> The International Council of Voluntary Agencies (ICVA) also found distrust and incomprehension among communities due to a lack of clear communication and transparency, which led communities to believe that the organisation was stealing the money – they could not understand that a donor could ‘take back’ funding.<sup>162</sup> Over two years, and across 12 countries, Ground Truth Solutions synthesised learning from more than 34,000 conversations and reflected on their findings in light of the Humanitarian Reset. Among many other priorities, people affected by crisis emphasised effective two-way communication, radical transparency and community engagement, and they argued that tokenistic feedback mechanisms and reducing AAP to ‘interagency feedback’ missed the point of letting communities drive tough decisions.<sup>163</sup>

In practice, AAP was frequently reduced to surveys, needs assessments or asking people to choose between pre-designed options with funding already secured.<sup>164</sup> Humanitarian organisations in the Central African Republic (CAR) treated community engagement as an add-on believed to be good practice ‘globally’, rather than practices that made sense for communities.<sup>165</sup> Evidence found a lack of basic infrastructure for aid providers to consistently listen to communities at the simplest level, and that community engagement and participation were not systematically integrated into processes such as Humanitarian Needs Overviews and Humanitarian Response Plans.<sup>166</sup>

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OCHA took steps to reflect community views in the Humanitarian Programme Cycle, producing guidance to ensure community consultations are part of joint needs assessments; conducting subnational consultations in Afghanistan, CAR and Chad; tracking joint AAP and perception indicators; and dedicating pages on community perspectives. However, the 2025 OCHA AAP evaluation found there were no processes in place to ensure these community inputs shaped OCHA’s decisions, strategies or workplans, nor to communicate back to communities.<sup>167</sup> Indeed, only 38% of OCHA’s partners were satisfied with its performance on including communities in response planning and decision-making.<sup>168</sup> Rapid timelines and implementation often constrained meaningful consultation and participatory design. In Colombia during the 2024 Humanitarian Needs and Response Plan



process, only 49% of agencies routinely consulted communities about their needs – and of these, only 37% (18% of agencies in total) said they adapted their programming based on what people told them.<sup>169</sup> Because interventions were largely predetermined, people had limited influence over programming.<sup>170</sup>

In the Democratic Republic of the Congo, only two in 10 respondents in Mweso (North Kivu) and three in 10 in Minova (South Kivu) felt they could participate in decision-making.<sup>171</sup> Similarly, the IAHE in Somalia<sup>172</sup> and the independent compendium review of the humanitarian response to internal displacement<sup>173</sup> noted that people were not involved in decisions and had limited understanding of how and why they were made, and that aid organisations largely overlooked people's agency and capacities. An internally displaced man in Sudan told us:



*'We as [internally displaced people] have not been involved in the decisions or consulted at all, they just deliver what they have, even when we raise concerns about the quantities provided and the items, they claim that this is what we can afford at this time.'*

This recurring exclusion of people affected by crisis from decisions, and the overlooking of their agency and capacities, also hinged on narratives about what communities are assumed to want and how these narratives may drive practice. Some interviewees pointed to a recurring assumption, in parts of the system, that agencies cannot always ask communities what they want because then 'people will ask for everything' – and agencies cannot provide everything. Interviewees working directly on community engagement challenged this framing; they argued that communities were typically clear and pragmatic about their priorities, which were often relatively focused rather than unlimited, and that they would not simply ask for 'everything'.

This aligns with Ground Truth Solution's finding that, even during acute crises, people prioritised support that helped them make long term plans, recover, return to their homes, rebuild and strengthen their livelihoods. In Ukraine, people strongly emphasised rebuilding educational and healthcare facilities, alongside upskilling and livelihood diversification; in Burkina Faso people expressed a need for agricultural support to regain autonomy; and in northeastern Nigeria and Somalia, people described humanitarian assistance and cash support as being extremely short lived amid severe inflation, leaving them quickly returning to the same needs.<sup>174</sup>



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Several positive examples showed the feasibility and value of a more accountable system. The International Rescue Committee's (IRC) Empower to Enable (E2E) project published a Learning Report and a toolkit (the latter in several languages).<sup>175</sup> In a five-month pilot in Iraq and DRC, the toolkit was tested to strengthen accountability by engaging frontline staff in decision-making and direct community engagement, and by integrating participation within organisational culture and strategy.<sup>176</sup> The UNFPA presented its interagency AAP system in northern Syria as a timely model for the Reset, since it built dialogue with communities into decision-making via SafeLine (a multichannel feedback mechanism, including an interagency hotline and receiving online complaints and feedback), rumour tracking (monitoring public social media to enable real-time responses to community perceptions),<sup>177</sup> and face-to-face engagement with a locally led community of practice. In 2025, more than 10,000 people used SafeLine, 500 volunteers supported in-person feedback and 1,285 rumours were logged (of which 10% were high-risk; that is, where people were at risk of immediate harm, requested urgent action, and expressed major dissatisfaction). Referrals led to concrete changes, including revisions to the Dignified Shelter Guidance.<sup>178</sup>

The International Federation of Red Cross and Red Crescent Societies' (IFRC) *Community Engagement and Accountability Strategy 2023–25* noted that impact research in Guinea, Malawi, Guatemala, Georgia and Indonesia found community engagement helped communities feel more resilient to tackle their problems in a durable way, and that community trust was critical to the success of their responses, including to Covid-19, Ebola and in Ukraine.<sup>179</sup> The Community Engagement Forum brought practitioners together to share practice and support community-led projects and complaint and feedback mechanisms, including via Community Coffee and Chat webinar series.<sup>xviii</sup> Our interviewees noted that the Forum was not prioritised in funding cuts, it was operating voluntarily at a 'skeleton level of activities' and was unable to follow-through on recommendations.

### Complaint and feedback mechanisms

An IAHE synthesis found that processes intended to ensure AAP – mainly feedback mechanisms – fell well short of expectations: people affected by crisis trusted neither these processes nor, more broadly, aid distribution itself.<sup>180</sup> Ground Truth Solutions, drawing on findings from the REACH 2024 Multisector Needs Assessment, showed that only 19% of households surveyed knew how to file a complaint with, or make a suggestion to, a humanitarian organisation; of those, only one-third had ever actually done so; and of those, fewer than half (43%) received a response.<sup>181</sup>

xviii The Community Engagement Forum, facilitated/managed by the Norwegian Refugee Council (NRC) and funded by UNHCR under the Global Camp Coordination and Camp Management Cluster, brought together humanitarian practitioners to share practice through knowledge exchanges, guidance materials, peer-to-peer learning and the promotion of best practices – including on community-led projects and complaints and feedback mechanisms. These activities were described as having improved AAP. It also ran the Community Coffee and Chat webinar series of 35 sessions at the time of the assessment (see Ndahimana (2025) <https://www.cccmcluster.org/resources/new-report-beyond-tokenism-displaced-persons-participation-cef-4>).



Our in-country teams told us that various local and international organisations established accountability systems in this SOHS period, including complaint and feedback mechanisms, hotlines, emails, boxes to receive suggestions, focal points and committees, but that their effectiveness was limited. Respondents in Sudan found that raising concerns seldom changed fundamental aspects of aid delivery, food rations, distribution timing or items provided. A cluster representative in Sudan highlighted multilayered communication chains in which complaints were forwarded across several offices and often lost:



*'100 requests I send, I get a proper resolution for two.'*

In Yemen, a lack of responsiveness to feedback created frustration, with people noting that their priority needs 'do not align with what is being provided by UN agencies'.<sup>182</sup> One senior humanitarian practitioner, who thought AAP had been 'slightly co-opted, slightly instrumentalised', said:



*'We need to have [complaint and feedback mechanisms], but very often [these] are used just to say: "Thank you for your complaint as to why you weren't included. Sorry, those are the rules". It's placating people; it's not opening a dialogue. Or: "Oh, I'm sorry the assistance didn't meet your liking, but that was the harmonised type that [it] was decided we were going to give". And so you're explaining why you've done what you've done.'*

Our aid-recipient survey found that 61% of people who gave their opinion, made a complaint or suggested changes were satisfied with how the aid provider responded. However, this differed from other findings that surfaced in this period. An evaluation in Somalia found that 65% of people who provided feedback or filed a complaint said they did not receive a response.<sup>183</sup> In Myanmar, international and local humanitarian organisations told us there was an absence of follow-up to community feedback and donor-driven priorities often prevented adaptation to that feedback. They also said participation was limited to enumeration only. In Afghanistan, according to OCHA's earthquake lessons, agencies reported having AAP systems in place (including Awaaz: the first nationwide inter-agency humanitarian call centre),<sup>184</sup> but there was limited clarity regarding how these systems were implemented or led to programmatic adjustments.<sup>185</sup> This was echoed by our respondents in Afghanistan, who reported having limited awareness of, or access to, clear channels through which they could raise concerns or suggestions; some were entirely unaware that such mechanisms existed.

The evaluation of the UN Children's Fund (UNICEF) Level 3 emergency response in northern Ethiopia found that early interventions focused on the immediate response; AAP was seen as limited to provision of suggestion boxes rather than



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being fully embraced for its strategic and ethical value.<sup>186</sup> Our team in Sudan similarly noted that, in emergency contexts with scarce resources and funding cuts, programmes were designed rapidly, leaving 'very limited room for feedback and suggestion' beyond surface-level consultation – and that even when UN agencies (like WFP) adjusted their activities, such adaptations were ad hoc rather than systematic.

Although changes were isolated, sporadic and the exception rather than the rule, practitioners told us of some examples of promising practice: In Ukraine, feedback helped to correct the exclusion of a mother who did not receive assistance; in a few cases in Palestine, satisfaction surveys helped to adjust the quality of food items and increase the amount of cash assistance; and in Poland, feedback led to improvements in collective accommodation centres, including better language support.

### Community and locally led accountability

Like the wider ecosystem (see [Chapter 4.1](#)), community and locally driven accountability practices often demonstrated stronger responses and legitimacy than formal systems. Internally displaced people in Sudan were too frightened or sceptical to use formal channels, preferring to complain informally to camp supervisors. In Myanmar, community accountability practices strengthened legitimacy where formal systems were weak. One interviewee said:



**Community and locally driven accountability practices often demonstrated stronger responses and legitimacy than formal systems**



*'Local volunteer groups are more responsive, better connected with the needs of affected households and able to act quickly. They often verify data in real time, distribute aid transparently and maintain trust with local residents. Their grassroots presence also makes them more accessible and accountable.'*

Evaluation evidence noted that communities preferred community-based channels due to cultural norms and a preference for resolving issues among themselves.<sup>187</sup> Humanitarian practitioners working directly with mutual-aid groups stressed the importance of community accountability measures. One interviewee, working for an international non-governmental organisation (INGO), provided examples from Palestine and Colombia on how communities created their own committees; each group had its own structure, and community members closely monitored one



another to ensure accountability. In Gaza, community-protection committees in every camp strengthened oversight and provided structured communication channels between camp managers, field staff and aid recipients, improving accountability, transparency and responsiveness to community needs.

One senior leader of a national NGO in the Philippines told us about the 'horizontal accountability' between their organisation, community-led groups and the wider community, which was grounded in communities' own assets, agency and social capital; community-led groups were entrusted with resources, and were responsible and very transparent with their constituencies. There were broader efforts to pilot locally led accountability, including the CHS Alliance programme, CHS LOCALED, which aimed to generate evidence on locally led accountability in the form of peer assessment in South Sudan, Ukraine, Nigeria and Bangladesh – and to fill a key AAP evidence gap. However, the programme was paused in January 2025 due to the cuts to the United States Agency for International Development (USAID).<sup>xix</sup>

## Advancing the prevention of sexual exploitation, abuse and harassment



***'We don't say it's not happening, it is happening a lot more than we think – or at least more than has been reported. Reporting is a big issue. There are trust issues, security issues, and many other factors. There's a lack of referral mechanisms; people don't feel safe to report, or they don't have access, or they would have to travel and spend money they don't have to go to a clinic or elsewhere. Funding is also very limited. So, we do what we can to raise awareness and monitor as much as possible.'***

**Aid practitioner, Myanmar<sup>188</sup>**

PSEAH<sup>xx</sup> remained a central institutional and reputational concern in this period – and a core part of AAP, dignity and the 'do no harm' principle. The 2022 SOHS noted that high-profile scandals generated momentum for new interagency mechanisms. Yet despite the proliferation of guidance and resources over this period, humanitarian actors acknowledged that many existing tools were either highly complex, technical and resource-intensive or too generic to support frontline implementation.<sup>189</sup> In response, a new wave of operational tools and initiatives were developed.

<sup>xix</sup> CHS LOCALED aimed to take a collective and localised approach, provide a comprehensive picture of aid effectiveness and drive improvements to close the gap in expectations between those providing assistance and those experiencing it (see CHS Alliance (n.d.) <https://www.chsalliance.org/chs-located-a-collective-solution-to-close-the-accountability-gap/>).

<sup>xx</sup> The terms 'sexual exploitation and abuse' (SEA), 'prevention of sexual exploitation and abuse' (PSEA), and 'protection from sexual exploitation, abuse and harassment' (PSEAH) are used differently across organisations and reports. They are used here as they appear in the original sources to preserve consistency with the cited material, rather than to imply interchangeable usage or confusion. Elsewhere in this report, PSEAH is used because it is broader and includes sexual harassment alongside sexual exploitation and abuse.



Under WFP's IASC PSEAH Championship (2024–25), WFP and the UN Food and Agriculture Organization (FAO) developed the Sexual Exploitation and Abuse (SEA) Risk Mapping Package to help humanitarian clusters directly address the risk of sexual exploitation and abuse within sectoral activities.<sup>190</sup> The IOM and WFP also launched *PSEA at the Frontline: Together We Say No* in 2022, combining training for frontline personnel with the co-creation of PSEA materials alongside community members.<sup>191</sup>

**Many existing tools were either highly complex, technical and resource-intensive or too generic to support frontline implementation**

Efforts to broaden participation included the establishment of a PSEA Advisory Group, composed of 12 women-led organisations operating in high-risk contexts, under the WFP 2024–25 IASC PSEAH Championship as a global platform.<sup>192</sup> PSEACap, established in 2023 by OCHA and NORCAP, deployed expert PSEA Coordinators to high-risk contexts as part of operationalising the IASC PSEAH Vision and Strategy 2022–26,<sup>193</sup> and it sought more than US\$9 million from donors in its 2025–26 appeal to support in-country activities, which are critical for strengthening interagency capacity and leadership in protecting against sexual exploitation and abuse.<sup>194</sup> ICVA assumed the IASC PSEAH Championship in January 2026, leading through an NGO coalition; it is focusing on strengthening evidence and learning, expanding support to frontline and local actors (through the PSEA Outreach Fund) and promoting the simplification of existing tools and coordination mechanisms.<sup>195</sup>

Investments continued to be made in PSEA staffing and structures throughout the period. By January 2024, 79% of WFP staff had completed mandatory PSEA training, although with limited follow-up and an overreliance on online modules.<sup>196</sup> However, a multiagency evaluation in Democratic Republic of Congo (DRC) showed that approximately 86% of volunteers involved in assisting people receiving aid were not briefed or trained on PSEA, and 80% of community organisations were not trained on PSEA and did not sign the relevant code of conduct.<sup>197</sup> Until the end of 2024, WFP's Ethics Office served as the organisation's PSEA focal point<sup>198</sup> and built WFP's PSEA capacity, though management lacked the confidence to proactively engage with PSEA.<sup>199</sup> WFP's evaluation found that PSEA was not systematically operationalised and data was primarily used for headquarters reporting rather than informing decision-making at regional and country levels, which made it difficult to track progress or identify trends across regions and types of intervention.<sup>200</sup>

Dedicated PSEA capacity expanded across UN agencies. In 2023, UNHCR maintained a seven-person headquarters team led by a director-level (D-1)



Senior Coordinator and supported by 400 focal points across 132 countries;<sup>201</sup> WFP maintained five fully dedicated PSEA staff and more than 500 focal points globally; and UNICEF maintained an established PSEAH unit led by a senior staff member (P-5) since 2019, with P-4 positions across all regional offices and networks of national and international PSEA specialists.<sup>202</sup> Many other organisations also relied on PSEAH focal points, reflecting the ‘trusted intermediary’ approach, whereby victims/survivors seek support through trusted intermediaries and community entry points.<sup>203</sup> However, these were usually staff members in existing substantive roles; focal-point duties comprised just 10–20% of their role, and short-term or rotating assignments constrained their ability to build trust or implement PSEAH measures.<sup>204</sup> There was limited evidence of the impact of these resources, nor analysis of costs relative to results, making it difficult to assess their value or establish which approaches delivered the best accountability outcomes.

The Misconduct Disclosure Scheme, implemented by over 380 organisations, aimed to prevent perpetrators of sexual misconduct from moving between organisations undetected.<sup>xxi</sup> Between 2019 and 2025, the scheme received 222,662 requests for misconduct data and responded to 196,368 of them, contributing to 677 rejected hires and zero upheld complaints or lawsuits. Although 2025 trends showed a decline in all these indicators compared with 2024, mainly due to cuts in the sector, the scheme continued to make good progress and participation grew.<sup>205</sup>

**Overall, our aid-practitioner survey suggested some progress since the previous SOHS study period**

Overall, our aid-practitioner survey suggested some progress since the previous SOHS study period. When asked how effective the humanitarian system had been in preventing and addressing exploitation and abuse of people affected by crisis, the proportion of respondents rating its performance as ‘excellent’ increased from 5.8% to 10.6%, while those rating it as ‘good’ increased from 34.6% to 40.4%. Qualitative responses, however, reflected a mixed picture. Respondents acknowledged greater investment in PSEA training, codes of conduct and reporting mechanisms, but continued to highlight underreporting, ineffective or poorly communicated reporting channels, limited consequences for perpetrators and concerns that organisations focused more on processes than action. Respondents observed:



***‘The sector asks the questions but does not adjust when there are problems.’***



***‘Report mechanisms are often ineffective and rarely shared with the communities of concern.’***

xxi See <https://misconduct-disclosure-scheme.org/introduction>



The CHS Alliance foundational paper identified a wealth of guidance materials; however, reparation and redress comprised one of the least understood and least addressed areas of PSEAH practice. Survivors of exploitation and abuse were often left to navigate and cope with adverse cultural, psychosocial, security and legal consequences alone.<sup>206</sup> One commentator argued that policy shifts and attention to PSEAH were largely reactive, driven by efforts to 'salvage credibility' following scandals and prioritising procedural accountability over prevention or meaningful redress for victims.<sup>207</sup>



**Comprehensive PSEAH measures were often in place, yet power dynamics, cultural stigma, fear of reprisal, weak judicial support and potential loss of assistance hindered progress**



Our in-country research and wider evidence found that comprehensive PSEAH measures were often in place, yet power dynamics, cultural stigma, fear of reprisal, weak judicial support and potential loss of assistance hindered progress. In addition, accessibility barriers, dense and confusing terminology, lack of trust in organisations and many mechanisms placing the burden to report on victims and survivors further constrained the effectiveness of these measures in situations of extreme vulnerability.<sup>208</sup> Concerns around anonymity and privacy posed another challenge. An evaluation of UNHCR's response to the L3 emergency in

Afghanistan raised concerns over pressures to share sensitive 'beneficiary' data and restrictions on female staff that constrained outreach to women and people with specific needs;<sup>xxii</sup> a strategic evaluation of WFP's PSEA framework identified breaches of confidentiality, inconsistent 'do no harm' practices and limited capacity to handle cases involving children and survivor referrals.<sup>209</sup>

The CHS Alliance's *Harmonised Reporting Scheme Snapshot (April–September 2025)* also highlighted power and accountability concerns.<sup>210</sup> Of 147 reported incidents of sexual exploitation, abuse and harassment, 62% involved aid recipients or affected community members, 44% of survivors were children and 97% were women. Managers accounted for 46% of alleged perpetrators in workplace-related incidents, with the proportion of senior managers increasing from 10% to 24% compared to the previous reporting cycle (October 2024–March 2025). Accountability also remained weak: substantiation rates (the proportion of allegations confirmed following investigation) remained at 31%, more than 20% of cases resulted in no action and 30% remained open. The snapshot further cautioned that declining incident

xxii According to UNHCR, 'persons with specific needs' (used interchangeably with 'person at heightened risk') are individuals who experience particular protection risks or barriers due to the intersection of their personal characteristics with their environment, and who therefore require targeted protection actions. In the Afghanistan L3 response, UNHCR developed Guidelines and Standard Operating Procedures for people with specific needs, with assistance targeting individuals requiring protection or life-saving interventions, such as single women without community support, survivors of gender-based violence, persons living with disabilities or those requiring medical or legal assistance (see UNHCR (2025) <https://www.unhcr.org/glossary>; UNHCR (2023) <https://www.unhcr.org/sites/default/files/2023-08/management-response-afghanistan-l3-evaluation.pdf>; UNICEF (2023) <https://www.unhcr.org/media/evo-2023-02-evaluation-unhcr-s-response-l3-emergency-afghanistan-2021-2022>).



numbers may reflect reduced reporting capacity and weakened safeguarding systems rather than a reduction in abuse. One respondent in Myanmar told us:



***'Because this sector deals with sensitive issues, "no report" doesn't mean "no incident".'***

Talk to Loop, an independent accountability platform, received 39,000 calls and processed 1,515 pieces of community feedback in Somalia and Somaliland between January and March 2025, including on PSEAH-related concerns. Use of this platform indicated growing community trust.<sup>xxiii</sup> During the same period, 79% of sensitive referrals received a response, although response rates varied considerably between INGOs (90%), NNGOs (89%) and UN agencies (57%).<sup>211</sup>

## Dignity under pressure



***'For me, a person has no dignity except in their own home.'***

Community leader, Palestine



***'We don't want to be made victims for a sack of rice.'***

Aid recipient, Haiti<sup>212</sup>

According to the SOHS evaluation synthesis, 'dignity' remained less well defined than 'accountability' and 'participation'.<sup>xxiv</sup> The updated Core Humanitarian Standard emphasised that all human beings are born free and equal in dignity and rights, linking this to three requirements: ethical communications (including in advocacy and fundraising), PSEAH, and protecting the safety and dignity of staff and volunteers.<sup>213</sup> The International Committee of the Red Cross (ICRC) mentioned dignity in relation to international humanitarian law,<sup>214</sup> while Catholic Relief Services provided new guidance, *Measuring Respect for Human Dignity*, to systematically track whether project activities and staff respect participants' dignity.<sup>215</sup>

Yet dignity is inherently subjective and context dependent – it cannot be easily standardised or captured through metrics or definitions. Beyond a small number of initiatives (such as the Catholic Relief Services' guidance), there was limited articulation of what 'dignified programming' looks like in practice or how to assess whether dignity was upheld. As a result, some major humanitarian evaluations and documents proceeded with no explicit mention of dignity at all, aside from references to a 'dignity kit'<sup>216</sup> or broad invocation of 'dignity and rights'.



**Dignity is inherently subjective and context dependent**



<sup>xxiii</sup> However, Talk to Loop closed in 2026, citing a difficult funding environment.

<sup>xxiv</sup> ALNAP commissioned evaluation synthesis. See [Methodology](#).



Dignity received the most positive assessment in our aid-recipient survey. When asked whether they were treated with respect and dignity by aid providers, 84% of respondents answered 'yes' compared to 73% in the 2022 SOHS, with slight variances between different types of organisations. Our in-country teams highlighted a perception gap whereby, for humanitarian actors, it may be enough for people to receive assistance and appear satisfied, whereas people affected by crisis see other factors – including barriers to accessing aid, injustices and their experiences and vulnerabilities – as affecting their dignity.

Across contexts, people told us they felt disrespected when they received poor-quality aid, such as spoiled goods, dirty clothing, expired items or irrelevant standardised kits. In Ukraine, focus group participants said:



*'Let it be smaller package, but with quality products ... It is so humiliating. There were pearl barley and 3 kg of oatmeal – and bugs were crawling in it.'*

This was echoed in Haiti in a Ground Truth Solutions survey: 'Even if people need aid, it's no reason to give them rubbish.'<sup>217</sup>

For many, dignity meant an individualised approach rather than prioritising quantity or efficiency, as a local authority representative from Gaza told us:



*'Dignity has been one of the hardest values to uphold. Our system is built for efficiency under siege, but efficiency often comes at the expense of people's sense of agency and respect.'*

People were concerned about not only the aid they received but also whether it was delivered respectfully and transparently. In DRC, respondents did not appreciate the IOM working at night to confirm the number of 'real' displaced people in a camp. In Palestine, respondents sometimes felt that aid providers acted as if they 'were giving from their own pockets', and that they used phrases considered disrespectful in Arabic, such as 'you are hungry'.

Our aid-recipient survey also suggested a strong association between communication and dignity: respondents who reported good communication from aid providers were 5.6 times more likely to report being treated with respect and dignity. Similarly, our Myanmar team found that transparent communication reinforced people's sense of dignity and helped reduce tension.



**Respondents who reported good communication from aid providers were 5.6 times more likely to report being treated with respect and dignity**





Across multiple contexts, distribution sites were described as unsafe, crowded and undignified, with long queues in harsh weather, unclear rules and a lack of safe spaces making people feel like ‘crowds’ rather than individuals.<sup>218</sup> In some cases, these conditions contributed to violence and injury. One participant in Haiti said a family member nearly lost an eye during a distribution.<sup>219</sup> In Sudan, people said:



***‘We walk through the whole of the state to get water ... it puts everyone in a humiliating situation and people experience bullying. Little children ... are bullied.’***

People living with disabilities, especially with reduced mobility or sensory impairments, noted that conditions at distribution sites often made aid inaccessible to them.<sup>220</sup> Respondents noted that most shelters lacked ramps, accessible toilets and assistance devices, and they told us that families had to carry relatives or leave them behind. One man living with a disability from Gaza said:



***‘I lost my house and then my dignity. In the shelter, I am a burden.’***

Several respondents cited privacy as key to protecting dignity. Others noted the physical and psychological toll of lacking privacy: some described intentionally going hungry so as to avoid using the bathrooms in crowded shelters, while women in Gaza were delivering babies on mattresses laid on the floor and one young pregnant mother prayed no would look at her when she gave birth. A displaced woman in Palestine said:



***‘I was displaced about six times. Our first displacement was to al-Nuseirat, to a school shelter. Around 120 people were crammed into one classroom of about 6 × 8 metres. At night we would step over each other to sleep, and we were families from different places. The classrooms were for women and children, while the men had to sleep outside, under the open sky, exposed to shrapnel from shelling, the danger from drones and bombardment, and the freezing cold and rain.’***



**The dignity of people affected by crisis was linked to them being treated as decision-makers**



Cash and voucher assistance gained significant momentum due to its flexibility and ability to uphold recipient dignity.<sup>221</sup> Sources variously referenced cash as ‘dignity in action’<sup>222</sup> and offering the ‘dignity of choice’.<sup>223</sup> Our in-country teams reiterated that the dignity of people affected by crisis was linked to them being treated as decision-makers; after the Kakhovka dam explosion in Ukraine, for example,

respondents appreciated cash and voucher schemes that allowed them to buy what they needed in a more dignified way. However, an evaluation for UNHCR/WFP of



multipurpose cash in Lebanon noted that refugees receiving cash reported cases of hostility, discrimination and verbal harassment from host communities, primarily due to deteriorated economic conditions<sup>224</sup> (See [Chapter 2.2](#) for further discussions of cash assistance).

The use of photos in the humanitarian sector has long been controversial and contested. Palestinian academic Yafa El Masri noted that photos used in humanitarian communications often strip people of their personhood, agency and dignity; she cited refugee communities referring to stock images of suffering (which often feature children) as 'UNICEF photos'.<sup>225</sup> One of our interviewees in Palestine also linked dignity to being photographed:



*'Because my sisters are disabled, they are the most exposed to being photographed as "special cases", but after they give them aid and photograph them, then [they] withdraw the aid. This is very harmful to them ... it is very offensive, annoying, and hurts their dignity.'*

Following widespread criticism for using a photo of a 16-year-old rape victim in its communications,<sup>226</sup> Médecins Sans Frontières (MSF) launched a review of its media archive – nearly 200,000 visual assets – in late 2021.<sup>227</sup> By the end of 2022, the review identified 10,000 potentially problematic images against ethical criteria including stereotypes, lack of dignity, protection of minors, security risks and disturbing or offensive content.<sup>228</sup>

In September 2025, VOICE Out Loud focused on the ethical challenges of humanitarian communications – such as narratives and photos – in fundraising, including colonial legacies, power dynamics and impacts on dignity.<sup>229</sup> Reflecting growing attention to locally led development, power, inequality and embedded coloniality and racism in the aid sector, Bond updated its ethical storytelling guidance in 2024. The guidance encouraged organisations to recognise contributors as partners rather than subjects; to move away from images and narratives that portray people as being in need of saving and that perpetuate racist stereotypes, instead recognising their capacities and agency; and to plan and budget for providing the final copies of photographs and stories to participants wherever possible.<sup>230</sup>

## Enabling accountability

### The value of accountability in a time of cuts

Emergency Relief Coordinator Tom Fletcher framed the Humanitarian Reset as 'cutting red tape and bringing decisions closer to households rather than agency headquarters'.<sup>231</sup> This will require the humanitarian system to commit and genuinely



invest in AAP, particularly in approaches that have demonstrated tangible progress and impact, and to exercise political will and pressure needed to sustain them. As ICVA's report *Lives on the Line* noted: 'accountability is not just a "nice to have"; in situations of acute crisis and shrinking budgets, community voices must drive decisions more than ever before, or we are failing miserably to fulfil our basic humanitarian mandate.'<sup>232</sup>

Cuts to assistance increased vulnerability to sexual exploitation and abuse, including through negative coping strategies such as transactional and survival sex.<sup>233</sup> In Mozambique, following cuts in food rations, displaced women reported that girls as young as 11 years engaged in these practices for as little as 50 metical (US\$0.25). In DRC, UNFPA described an 'epidemic of survival sex' linked to a lack of other livelihood options, and several displaced women and girls reported exploitation by community leaders and humanitarian staff.<sup>234</sup>

We found strong evidence, through our aid-recipient survey and wider research, that communication, consultation and the opportunity for people affected by crisis to provide feedback and receive responses all correlated significantly with more positive results on dignity, relevance, targeting and quality.<sup>xxv</sup> Several exercises and pilots during this period showed that genuine and meaningful community engagement in planning and decision-making led to responses that better reflected community priorities and strengthened trust.

**Genuine and meaningful community engagement in planning and decision-making led to responses that better reflected community priorities and strengthened trust**

In the Philippines, the Flagship Initiative developed and piloted the Listen, Discover, Enhance approach, which systematically engaged communities to identify their priorities, capacities and locally led solutions and to develop and fund action plans.<sup>235</sup> Following a cyclone in Caraga, the community developed an action plan cofinanced by a national NGO and the local government; they prioritised a new water system, with the community providing land and labour. Participatory community consultations in South Sudan helped around 10,000 internally displaced people across Unity, Upper Nile, Jonglei and Western Bahr el Ghazal gain access to farmland and resources, leading to improved harvests and

xxv For example, our aid-recipient survey found that communication was the strongest driver of positive perceptions. People who felt well-informed about the aid they received rated humanitarian performance much more positively across the board, especially dignity (about six times higher), targeting (about five times higher) and quality (about four times higher). In addition, twice as many people reported being consulted in this period compared to the previous SOHS period (55% of people who responded said they had been consulted on what they need prior to distribution; 45% said they had not), while feedback mechanisms showed the weakest performance (41% of people who responded said they were able to give their opinion, make complaints, or suggest changes to aid agencies; 42% said they were not). Consultation also had moderate positive associations with satisfaction with targeting, quantity, timeliness, relevance, quality and feeling treated with dignity. Providing feedback had smaller but consistent positive effects on the same outcomes.



reduced aid dependence.<sup>236</sup> In Wau, 2,700 internally displaced people were able to return to their villages after lengthy displacement following collective consultations and follow-up with authorities and partners.<sup>237</sup>

A recurring challenge that emerged was the limited external pressure on organisations to respond to feedback and follow through on accountability commitments, alongside a tendency to 'mark their own homework'. This points to the potential value of further exploring independent mechanisms and associations, which could help to connect communities affected by crisis with those who hold power, resources and decision-making authority. In this period, several independent accountability mechanisms and platforms – such as Talk to Loop, Ground Truth Solutions and CHS Alliance – tried to go beyond collecting feedback; however, they were often squeezed by funding cuts and the system's resistance to independent mechanisms.



**AAP and PSEAH systems are most trusted when they provide safeguards between communities affected by crisis and those responsible for decisions and resources**



Interviewees and wider evidence noted that such mechanisms could help to ensure that communities' perceptions, priorities and experiences inform decisions, rather than reducing AAP to a compliance exercise focused on reporting and tools. Effective accountability requires mechanisms that are sufficiently independent from those exercising power, whether UN agencies, INGOs, local and national actors, or community leaders. AAP and PSEAH systems are most trusted when they provide safeguards between communities affected by crisis and those responsible for decisions and resources. Political and reputational

sensitivities, particularly among larger humanitarian agencies and organisations, created reluctance in this period to share information, engage with independent scrutiny or support accountability mechanisms beyond their direct control.

### The role of donors

Donors can play a critical role and use their leverage to shape incentive structures around accountability and the enforcement of accountability commitments. Several humanitarian interviewees argued that organisations were often more responsive to donor scrutiny than to affected populations themselves. One interviewee explained that when donors required their grantees to follow up on complaints made by people affected by crisis to an independent platform, responsiveness to sensitive reports – such as protection concerns, PSEAH, fraud and corruption, or requests for mental-health support – increased substantially and to a greater rate than other forms of feedback.

Our in-country research in DRC noted similar dynamics: organisations that had reported no cases related to PSEAH for eight months subsequently reported more than 100% of expected cases after being informed that failure to report could affect future funding. As one practitioner working directly with these mechanisms put it:

 ***'The reality is the accountability follows the money.'***

 **Several humanitarian interviewees argued that organisations were often more responsive to donor scrutiny than to affected populations themselves** 

Donors and intermediaries could therefore play an important role by providing greater flexibility for programmes to adapt to community feedback and requests and changing contexts. As highlighted in the Collective AAP Advocacy brief released by OCHA, this requires shifting the focus from collecting feedback and imposing limited penalties to acting on feedback, and from rigid and process-driven requirements towards funding approaches that prioritise outcomes for people affected by crisis.<sup>238</sup>

### Improving trust

Some humanitarian leaders and commentators have argued that the humanitarian system is facing a crisis of trust and legitimacy.<sup>239</sup> Trust (or lack of trust) – a fundamental element of AAP – operates at multiple levels: relationships between communities and aid actors, between local and national actors and international organisations, and among international aid organisations themselves.

Our Myanmar team emphasised that communities' trust in humanitarian actors hinged on clarity, consistency and neutrality of operations, as well as transparent communication and visible follow-through. Communities trusted when agencies publicly shared donor information and budgets, and they expressed greater confidence in aid groups that returned regularly and kept their promises. In contrast, one-off visits without feedback from aid providers created scepticism. Evaluations in Türkiye, Lebanon and Somalia found that lack of transparency led to heightened mistrust and perceived politicisation and favouritism, among other impacts.<sup>240</sup>

ICVA similarly found that failing to respond to feedback undermined the credibility of, and people's trust in, the humanitarian system.<sup>241</sup> Further, when community-engagement exercises promised action but did not deliver it, this often led to 'disillusionment or even anger', particularly when projects diverged from jointly identified priorities. There were also challenges in translating these priorities into operational planning processes, such as for the Humanitarian Needs and Response Plan;<sup>242</sup> as the Flagship Initiative noted, the accountability of Humanitarian Coordinators and Humanitarian Country Teams needs to be measured by whether they deliver against the priorities of communities affected by crisis.<sup>243</sup>

Trust is also shaped by whether accountability systems are seen to generate consequences and enforcement. In Goma, DRC, one respondent noted that perpetrators of sexual exploitation, abuse and harassment were sometimes only relocated, limiting deterrence and leaving conditions for repeated abuse. Interviewees highlighted key accountability challenges, including weak enforcement and limited sanctions, which can enable impunity (especially in cases of exploitation and abuse), silence whistleblowers, fail to secure survivors' rights and contribute to the lack of political will to properly resource and institutionalise accountability.<sup>244</sup> These dynamics also undermine trust. Unlike in a business, humanitarian actors do not have to respond to signals and feedback from clients, since their 'clients' – people affected by crisis – have nowhere else to go.<sup>245</sup>

**Unlike in a business, humanitarian actors do not have to respond to signals and feedback from clients, since their 'clients' – people affected by crisis – have nowhere else to go**

## Conclusion

The evidence from this SOHS period suggests that strengthening accountability is one practical way for the humanitarian system to rebuild credibility and regain damaged trust. However, this is ultimately a question of political will and humanitarian leadership. There are several levers that can help. Independent mechanisms and platforms can provide safer channels and make responsiveness more credible. Donors and intermediaries can shape incentives – not only through what they fund, require and monitor, but also by providing greater flexibility for programmes to adapt to community priorities, feedback and changing contexts. Accountability is also strengthened when commitments are followed through, when there are consequences for inaction and misconduct, and when humanitarian organisations are prepared to explain difficult decisions transparently and demonstrate how community perspectives have influenced them.

As the humanitarian system navigates shrinking resources and increasingly difficult trade-offs, accountability becomes more, rather than less, important. The evidence from this period may suggest that rebuilding trust will depend less on making new commitments than on fulfilling existing ones, on demonstrating responsiveness in practice and on showing that people affected by crisis genuinely influence humanitarian decisions.

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