The Role of Gatekeepers in Somalia – Roundtable Reflections

February 2024

Following research on the role of gatekeepers in Somalia, conducted for the Somali Cash Consortium (SCC), the authors of this memo conducted a series of roundtable discussions, in Mogadishu and Nairobi, in January 2024, in order to share their preliminary findings and stimulate suggestions for potential responses by humanitarian actors.[1] The participants in the Mogadishu roundtables included separate groups of local NGOs, INGOs (in three different subgroups) and UN agencies. In Nairobi, a similar roundtable took place with donors. Collectively, over 50 people made up these roundtables and exchanges, which ranged in length from 1.5 to 3 hours, reflecting the current interest in this subject as well as the general level of openness and critical reflection expressed by participants.[2]

The aim of the study focused on CVA (Cash and Voucher Assistance) programmes was to deepen understanding of 'gatekeeping' in Somalia, identifying and documenting both positive and negative practices, as well as exploring means to improve the accountability of gatekeepers within the humanitarian system and, implicitly, to reduce exploitative behaviour towards displaced populations.

This memo summarises some of the key findings of the study along with the messages coming out of the roundtable discussions in Nairobi and Mogadishu. The purpose of releasing this memo soon after the roundtables is to contribute to the continuation of momentum on this subject, given its links to related processes underway within the aid system, notably through the PDAD (Post-Distribution Aid Diversion) process. A final report and learning brief/roadmap will follow this memo.

What do we mean by gatekeepers?

The term 'gatekeeper' means different things to different people. In the context of humanitarian crises in Somalia it is most closely associated with an individual who is considered the manager of an IDP camp. It is however important to recognise that such individuals act within a chain or network of actors that may all be considered gatekeepers involved in the management and/or control of aid resources.

In this study, our findings highlight two types of gatekeepers, one is the camp manager or camp owner (displaced people often use the word 'owner'), in what we identify as an IDP business model. This type of gatekeeper can also be described as a 'humanitarian entrepreneur', and acts as an interlocuter between displaced people and other actors in the gatekeeping chain. The second type of gatekeeper, that we associate with all other programming contexts (and specifically not the IDP business model described below), can be any individual or a combination of actors working together, that control or influence the distribution of aid resources. In some cases, a powerful District Commissioner might be the primary gatekeeper, in other cases the implementing NGO or contracting UN agency may be the primary gatekeeper (through specific staff). Local elders may also be important in these dynamics. Often it is a combination of these actors who work in a collusive relationship. The behaviour of these gatekeepers may change over time as local authorities change and agency staff change.

Key Messages from Roundtables

Engagement to discuss findings highly appreciated.

Feedback on the roundtables during and following the various sessions has been very positive. This is important to acknowledge given the deeply problematic picture presented at these sessions, not just in relation to the narrower gatekeeping phenomenon (i.e. the more exploitative business model) but also in relation to the wider business of aid and corruption of aid in Somalia. As one study respondent suggested, 'when you look at gatekeepers you open up the whole business of aid'. A focus on gatekeepers inevitably brings attention to the more exploitative and damaging aspects of the aid system and while some degree of resource loss is inevitable in contexts such as Somalia, what degree is 'acceptable' and how to mitigate excesses in order to support vulnerable populations should be at the forefront of our minds.

Many of the dynamics raised are not particular to Somalia but are also found in other contexts. Furthermore, many of the Somali staff who were part of the roundtables and who live and work in the country recognise many of these practices and find them upsetting and demoralising. They force many people to question the relative costs and benefits of providing aid in Somalia and whether it causes more harm than good.

Promoting discussions on sensitive and difficult issues such as gatekeeping, in safe environments, that allow participants to talk beyond narrow programming modalities, was pointed out as a useful contribution of the roundtables – this point was also highlighted in 2019, following an intense dissemination and engagement exercise, in which the authors of this study were involved – see 'Talking Food and Power in Somalia'.

We've been here before – repeating cycles in humanitarian response?

One of the themes raised in the roundtables was that of the potentially repeating cycles of: a) humanitarian crisis, b) humanitarian response, c) corruption scandals, d) reflection and learning, and e) return to the underlying status quo. For example, the following characteristics – a humanitarian malaise – within the aid system in Somalia were presented at the roundtables:

- fragmented humanitarian community;
- a competitive structure of funding that makes genuine information sharing difficult;
- a fear that admitting mistakes will lead to blame and stigmatization;
- high agency staff turnover meaning new people have to relearn the same lessons.
- diversion of aid has long been a problem in southern and central Somalia and the more "remote" that management has become, the more difficult the problem has become;
- the proliferation of third-party monitoring may have helped to increase accountability to donors in the short term but does little to build genuine trust among partners in the longer term—and may, in fact, be undermining it.

These factors, highlighted in a report in 2014 and repeated here, also suggested that the 'sum of these factors makes an honest discussion about operating in Somalia very difficult.'[3] Many participants in the roundtables recognised that these characteristics are still valid today. While these features apply across the humanitarian sector (and are similarly applicable in the development sector), in this light, a participant in the UN roundtable pointed out that the UN system does not act as one and appealed to those in the room to do so.

Raising these characteristics here is done to emphasise that addressing these issues is very difficult and requires systemic and sustained action in order that they are not equally valid in the next 5-10 years.

Control of and access to information on aid?

Many forms of research and information gathering in Somalia, particularly concerning the aid sector, have become incorporated into or affected by a deeply entrenched political economy of aid information. An important and recent study – see here – on this subject identified the different forms that this takes. The authors point out that there is a significant 'Interview fatigue and instrumentalist attitudes towards research by respondents.' This is supported by other sources, such as independent accountability mechanisms which have pointed out that 'Fear (among many barriers) keeps people from giving feedback'.[4]

The manipulation of data and information is manifest at all levels in the data/information collection and reporting chain, by so-called 'beneficiaries' themselves, as well as within the incentive structure of the aid system, where a recent discussion paper points out that 'At each

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[3] Maxwell, D., and Majid, N. 2014. "Another Humanitarian Crisis in Somalia: Learning from the 2011 Famine." Feinstein International Center (https://fic.tufts.edu/publication-item/another-humanitarian-crisis-somalia/): see also: Majid, N., Jelle, M., Adan, G., Daar, A., Abdirahman, K., Hailey, P., Balfour , N., Seal, A. and Maxwell, D. 2022 (https://fic.tufts.edu/publication-item/another-humanitarian-and-political-crisis-in-somalia-in-2022/)

[4] Cash Barometer, 2023, Overcoming Power Imbalance (https://reliefweb.int/report/somalia/somalia-cash-barometer-overcoming-power-imbalances-community-recommendations-breaking-cycle-july-2023). The 'other barriers' referred to were not elaborated on in the report but we assume they include some of the factors mentioned in this note.

link [in the contracting chain], pretty much everyone is incentivised to report positive information and to not report or deny negative information'.[5]

The field research for this study came across the same issues, with a member of a focus group discussion (FGD) with IDPs, commenting that, after a long discussion and reluctance to speak openly, 'we have been forced to say what we've been hiding for a long time'.

This political economy of aid information is distorting our understanding of Somalia as well as the effectiveness and performance of aid programmes; from assessments to post-distribution monitoring, and other types of information gathering processes. These issues were recognised in the roundtables, with TPMs (Third Party Monitoring agencies) being questioned by some, as a weak link in the flow of accurate information.[6] Reviewing and rethinking assessment and monitoring tools and approaches by the humanitarian community is a logical follow-up on this topic.

Two Gatekeeping Models

Two models of gatekeeping were presented in the roundtable sessions, one described as a business model focused on IDP camps in major urban centres (Mogadishu and Baidoa) and the other a model that describes the typical pressures associated with implementing CVA (and other) programmes in Somalia. The exact mechanics of these two models will vary from location to location and over time, depending on local power dynamics and as individual and institutional actors and behaviour change. These models can also run alongside each other; in the major aid hubs such as Mogadishu and Baidoa both models will apply.

   a)   *IDP Business Model (Mogadishu and Baidoa)*

In the business model, an IDP camp manager or owner (IDPs call them the camp 'owner'), is the primary gatekeeper. He or she (there are many women camp owners) makes a number of upfront investments and arrangements in order to set up a camp, as part of a business enterprise. This typically includes obtaining the land, usually on a rental basis, from the landowner (or claimant), with an agreement often made for 5 years through the use of a notary, and a fee for the camp to be registered. The camp owner may also work with other brokers to encourage and organise for people to come from rural areas to their camp, make links to humanitarian agencies and even pay for the cost of transport. Once the new IDPs arrive in the new camp the gatekeeper registers the camp with the local authorities as a new camp with new arrivals. The registration documents to humanitarian actors including the CCCM (Camp Coordination and Camp Management Cluster). These actors including the CCCM will at most visit the camp to verify if it meets the minimum standards to be a camp (although this study found IDP camps much smaller than the minimum requirement). It is important to note that these commercial gatekeepers understand all the requirements to make a camp.

These upfront investments by the camp owner (made in different combinations of cash and credit) are undertaken in order to generate an income as a return on investment, once aid (particularly cash or vouchers) is brought to the camp. This return is made through a pre-agreed social arrangement with camp populations (IDPs), the most common breakdown of which is:

[5] Centre for Humanitarian Change (CHC), 2023, 'Corruption and Aid Diversion in International Aid in Somalia, Discussion Paper'.
[6] This has been raised elsewhere: Transparency International, 2016, 'Collective Commitment to Enhance Accountability and Transparency in Emergencies, southern Somalia report (https://www.transparency.org/en/countries/somalia), and CHC 2023, op.cit..

50% of a cash/voucher entitlement for the 'beneficiary' with the remaining 50% claimed by the camp owner and reallocated on the following basis: 10% rent; 10% security; 10% local authority/NGO/UN; 20% camp owner.[7]

The figures provided raised discussion in the roundtables around whether modified humanitarian modalities could reduce these losses by, for example, including rent as part of the MEB (Minimum Expenditure Basket), or working with local authorities to provide security and/or land, or engaging with camp owners to reduce these 'commissions'. These or other initiatives need careful consideration and need to be explored and tested by aid organisations. Any new initiatives cannot be conceived as technical solutions only, they require complementary engagement at political or governance levels in order that they do not simply provide further profit-making opportunities for various gatekeepers. It also raises the issue of doing proper camp assessments (for new ones and existing ones) rather than automatically certifying or registering them as is currently the case.

Displaced populations have mixed views of these social agreements. For many of them, a 'cut' taken by camp owners is reasonable as they – the camp owner – provides some assistance when they first arrive and are perceived to be critical in bringing aid to the camp and its residents. However, there are also levels of coercion and exploitation that take place, where camp residents know or are told that, if they report problems, they will be evicted from the camp and will lose their benefits. In this light, one IDP respondent was advised 'don't punish yourself and don't punish others' (by reporting problems). This quote is consistent with the political economy of aid information raised earlier and raises questions around the efficacy of feedback mechanisms and the nature of engagement and communication between implementing actors and local communities.

This business model is based both on the large amounts of aid coming into these hubs as well as due to the shortage of available land; a key enabling factor is the privatised access to land.

b) Typical gatekeeping model (Belet Hawa, Dinsor, Wajid)

Belet Hawa, Dinsor, and Wajid were the locations in which research was conducted for this study (in addition to Mogadishu and Baidoa). These locations were identified with the usual or clan-based gatekeeper model. This model is distinct from the IDP business model in that, a) there is not the equivalent business aspect (articulated as an investment and a return on investment), and b) there is no primary business actor i.e. the camp manager or owner. In these locations, there are no major IDP camps and therefore the business model has not been established.[8]

Gatekeeping, according to this model, is based on the competition for resources between clans or sub-clans that exists in most or all areas in Somalia. The gatekeeper/s may be the local authority, the local elders or the implementing agency itself (or some combination of this group), who attempt to direct resources towards their own identity groups. This model may involve competition between similarly powerful local clans, or it may be part of marginalisation /

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[7] These figures are consistent with other studies which suggest a 20-50% range as the 'cut' of the beneficiary entitlement. According to this study, a 50% cut (to the camp owner who then pays others) is the dominant model in large aid hubs such as Mogadishu and Baidoa.
[8] Dolow, although not part of the study, maybe involve some elements of model A, given its history as a major hub. This was not explored in this study.

exclusion processes with dominant clan interests limiting access and assistance to marginalised or minority groups.

These dynamics have been part and parcel of operating in Somalia for the last thirty years. All agencies and resources are subject to these clan-based pressures, and all resources are affected, from contracts (for car hire, office space and accommodation) to staff recruitment as well as to cash and voucher distribution modalities. These practices and pressures also exist outside of the aid system as part of norms in society. The challenge for aid agencies is to understand and navigate these pressures and not be captured by specific interest groups.

The subject of marginalisation / exclusion has brought attention to this 'gatekeeping' topic and model in recent years, where aid agencies – international and national, UN and NGOs – themselves are recognised for their incorporation into these clan-based biases and power dynamics through, for example, their staffing and resultant association with specific clans. This remains a structural feature of the Somalia operating environment and while good practice exists for resisting these pressures, many organisations do not acknowledge these internal biases or act upon them.

This gatekeeping model was clearly recognised within the roundtable discussions, and also recognised as a deeply entrenched problem.

Pressures on staff

The study identified and presented in the roundtables the pressures faced by agency staff in relation to both gatekeeping models. Five pressures were identified:

- Clan pressure (pressures to bring benefits to one's own clan)
- Peer pressure (pressure to instigate or take part in corrupt practices given others are doing so)
- Local authority pressure
- Internal, organisational pressures (to deliver projects, not bring problems and a fear of being perceived as not being able to do one's job)
- Security pressure (risks associated with reporting biases or corruption/diversion)

While these pressures on staff are real, some participants in the roundtables also suggested that they can become an excuse to not move outside of one's secure offices and compounds. A reluctance to move may in part be a post-Covid phenomenon but is also one that can become 'normalised' in contexts like Somalia and may contribute to the 'humanitarian malaise' identified above.

There is an urgent need for staff to be more 'out there' in IDP camps and closer to vulnerable populations. There are some staff that do this and can quickly identify issues and problems through observations and discussions, although we also acknowledge that being more present in the field will not reveal many practices, which are hidden. Being more present and mobile in field locations requires appropriate staffing (in numbers, motivation, and capacity) and developing good contextual understanding (both informally, within a field team as well as formally through political economy-type analyses). Understanding local dynamics in Somalia is complex but can be developed with appropriate human and financial resources and support.

Are Cash and Vouchers the Problem?

Researching the role of gatekeepers in cash and voucher programmes also raised the question for many roundtable participants about whether cash and vouchers are themselves the main problem, as they attract predatory actors, and therefore whether other modalities need greater consideration. The volume of cash and voucher-based programmes in Somalia has been very significant over the last ten years, and the business mentality around displacement, including in the incentives to exaggerate numbers of needy populations, is worrying (although far from specific to Somalia). One of the findings of the study, confirmed by participants in the roundtables, is that since the large-scale cash and vouchers response to the 2011 famine, the IDP business model has become much more structured and organised than was previously the case.

An alternative perspective, articulated by some roundtable participants, was that just as food aid was the target of cartels and corruption in previous years, it is inevitable that cash and vouchers have become the target over the last ten years; that is, it is not the modality but the underlying political economy of aid that is the major issue. A further response to this discussion is that the mantra and shift to cash-based programming that has taken place over the last 10-15 years, has suppressed more critical analysis and debate, including concerning the different ways and potential ease with which cash and voucher-based assistance can be captured or diverted by gatekeepers. In a report in 2019 on the shift from food to cash in Somalia, the authors stated that '*Aid organisations, business, and government – and possibly Al-Shabaab – all benefit from the status quo of continued aid flows into government-held urban areas. However, it also requires maintaining a large, displaced population and, by extension, the continued marginalisation and exploitation of certain population groups. The displaced have become not only a way of maintaining aid but also a business opportunity and a political tool. Gatekeepers or entrepreneurs set up displaced camps as a way of attracting aid and increasing the value of land*.' In other words, while cash and voucher programmes have become a relatively cost-effective means of transferring assistance to local populations, in Somalia's limited access environment might it also have become a convenient – or at least under-scrutinised – modality for justifying aid operations and enabling an exploitative business practice to develop - this is a question for which this study or the roundtables did not have an answer, but that deserves further consideration.

Some participants in the roundtables suggested that the rapid scale-up of cash and vouchers in a severe humanitarian crisis is part of the problem as this is when the predatory practices emerge most strongly, which may indeed be true, but the underlying gatekeeping phenomenon (of both models) arguably take place at all time.

Improved data sharing, assessments and targeting approaches may mitigate some of these risks and practices, however gatekeeping, whether referring to either of the models described here, will continue to persist in Somalia. The question remains of what can be done to mitigate its most exploitative effects. In the case of the IDP business model, this may be done by moving from an informal arrangement to a more formal, accountable and transparent model. There is very limited experience to draw upon in this regard, two of the exceptions being the work of Tana Consulting (see here and here), and the findings of the study associated with this memo. Therefore, agencies will need to draw upon these outputs and design, implement and test programmes based on a thorough analysis of the gatekeeper model appropriate to their areas or camps of operation.

Who provides humanitarian governance?

An underlying theme in relation to the role of gatekeepers, raised in the roundtables, is who has responsibility for mitigating the most exploitative practices that are taking place within the IDP business model and in relation to corruption and aid diversion more broadly. In this light, a question was raised about the appetite of the Federal government to engage constructively in this area. The study authors were not able to pursue this issue as part of their work but the role of government, at its different levels, is clearly crucial, albeit within the constraints of what is still an emergent form of authority.

Also raised in the roundtables, was the question of honesty and accountability within the UN system and amongst humanitarian actors and leadership more generally. This is a question that many Somalis in government, society as well as within aid organisations, regularly ask. A meaningful dialogue concerning accountability and humanitarian governance between international aid actors and governmental authorities requires that the former, led by the United Nations, is honest about its own history and incorporation into the political economy of aid in Somalia. The legacy of last year's UN investigation into corruption and aid diversion remains problematic in this regard, where few have seen the report and where some argue that the UN has not sufficiently acknowledged its own role as a 'gatekeeper'.

A recent report on meaningful participation in formal and informal governance systems provides a useful framework for understanding these issues and, while acknowledging the difficulty of influencing change, argues that such engagement is necessary by international actors.[9]

Next steps

This memo has provided a summary of key points raised and discussed at a series of roundtables on the subject of gatekeeping in Somalia. Delving into this subject inevitably raises difficult and complex issues around the relationship between humanitarian assistance, displacement, and business interests, at a systemic level, concerning the history and logic of humanitarian engagement in Somalia, as well as at a more programmatic level, concerning potential entry points for alleviating the more exploitative practices.

This memo, we hope, stimulates further discussions along these lines, continuing the rich and healthy conversations that took place during the roundtables.

A final report and learning brief/roadmap will be produced in the coming weeks.

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[9] Meraki Labs, 2024, 'Meaningful Participation in Local Governance Systems for Marginalised Communities in Somalia'.