

COMPLEX HUMANITARIAN EMERGENCIES AND DISASTER MANAGEMENT IN BANGLADESH: THE 2017 ROHINGYA EXODUS

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Executive Summary

The exposure to natural hazards has prompted Bangladesh to institutionalize disaster management and coordination. This report examines Bangladesh's established disaster management structures and the role of key actors through reviewing existing literature from international organisations, academia, and think tanks, followed by interviews with key disaster management stakeholders in Bangladesh from the end of February to the beginning of March 2018. In analysing the response to the 2017 Rohingya Exodus, this report aims to identify lessons learnt and factors which may impede effective disaster management and coordination between different actors with some operating outside their traditional mandated area of natural hazards to govern a complex humanitarian emergency.

It is clear from the literature and stakeholder consultations in the preparation of this report that Bangladesh has the capacity to mobilise emergency response swiftly. The country's disaster management structures and actors coordinate and manage response efforts in the face of natural hazards such as annual floods and seasonal cyclones. Both state and non-state actors expressed confidence in Bangladesh's disaster management plans such as the Cyclone Preparedness Plan, which exemplified a community-based and bottom-up approach to confronting natural hazards. However, gaps in existing disaster management structures and operational challenges in coordinating disaster response became visible when those processes are examined in light of the 2017 Rohingya Exodus. The report investigates the ability of Bangladesh's disaster management system to govern disasters under four broad themes: operational constraints, coordination, accountability and localization.

The response to the 2017 Rohingya Exodus showed that existing disaster management mechanisms and processes in Bangladesh need improvement to handle large scale, conflict-induced and complex humanitarian emergencies such as a mass population movement into Cox's Bazar – an area exposed to natural hazards. The emergency response during the 2017 Rohingya Exodus was a process led by the Prime Minister's Office. Various government agencies and departments were involved in the emergency response but their particular roles need more definition, and horizontal coordination between ministries needs greater attention. Key disaster management actors faced institutional and procedural barriers, particularly during the early stages of the emergency response. The three most significant barriers identified were: (1) large number of agencies involved with overlapping mandates, and the demarcation of Rohingya and host populations for separate governance mechanisms; (2) the constraints placed on key humanitarian agencies by the government; (3) difficulty and delays in obtaining the correct paperwork for international staff; and (4) the delay in processing incoming relief items at airports.

The dominance of a handful of international non-governmental organisations (INGOs) and UN agencies in decision-making platforms for coordinating the emergency response in the crisis also exacerbates accountability issues. This prompted calls for the localization of disaster management efforts in Bangladesh and for international actors to leverage the comparative advantages of local counterparts to deliver higher quality interventions. Having identified the policy and operational gaps in disaster management in Bangladesh, this report makes the following recommendations to enhance the efficiency of disaster management and coordination:-

For Bangladesh

- Improve community-based disaster preparedness by leveraging trained local volunteers. For example, expand the Cyclone Preparedness Program to support and train Rohingya and more host communities;
- Streamline and revise approval processes for incoming relief goods, funds, and personnel drawing on regional experiences like the Philippines;
- Assess alternative national entry points to Dhaka for foreign relief materials;
- Develop an approval process for INGOs that augments local capacity rather than reduces it;
- Map local community organisations to enhance localization with international organisations;
- Build stronger linkages between RRRC and local governments to mitigate challenges between displaced and host communities;
- Produce templates for contingency planning complex humanitarian emergencies drawing on global expertise, particularly for monsoons, landslides and earthquakes;
- Reassess the Cox's Bazar development plan and integrate disaster management as part of long-term development. Post-disaster infrastructure development can be a catalyst for the long-term growth of Teknaf and Ukhia;
- Actively engage in multilateral forums for disaster management such as the Regional Consultative Group on Humanitarian Civil-Military Coordination and disaster management exercises like DREE to bring together military, civilian, NGOs and the

Red Crescent/Red Cross communities to explore best practices for disaster management;

- Formalize knowledge transfer from Bangladeshi contributions to UN Peacekeeping Operations to other civilian and military responders.
- Re-establish camp committees to govern the Rohingya refugee camps to provide greater democratic and equal gender representation in decision-making.

For Non-Government Organisations

- Establish a formal and accessible feedback system for beneficiaries to providers, and a peer-to-peer feedback mechanism between humanitarian organisations;
- Integrate humanitarian standards and accountability mechanisms into different stages of the funding cycle, from proposal writing to final reporting. These include periodic monitoring and evaluation of implementation partners, documented donor visits, and peer monitoring between humanitarian organisations;
- Increase disaster preparedness among local and national organisations by building organisational policies and processes that would facilitate disaster response coordination responsibilities;
- Work with local government to increase knowledge of the Standing Orders on Disaster and other disaster management policies and guidelines, and to prepare their own contingency plans through a formalized training program;
- Identify local capacities and engage with local actors for disaster preparedness, including non-traditional actors like faith-based groups, the private sector, and other civil society organisations;
- Introduce and finance structured knowledge-transfer and capacity-building programs between international and Bangladeshi humanitarian organisations, including seconding an INGO staff member to Bangladeshi partners;
- Identify capacity gaps and complementarities among local and national disaster management organisations with international actors through research.

1. Introduction

Bangladesh is the 10th most exposed country to natural hazards, and the fifth most at risk of an extreme natural event turning into a disaster according to the United Nations 2016 World Risk Report. The country is exposed to both slow and quick onset disasters, including annual floods, cyclones, salinity intrusion, earthquakes and landslides. Natural hazards aside, the country is also at risk of emergencies stemming from political developments within and outside of the country. These include political violence, military involvement in politics, and large-scale population movements. Since 25 August 2017, Bangladesh is a refuge for some 646,000 additional Rohingya refugees.

A range of actors, including the civilian government at all levels, security forces, international development institutions, local and international Non-Governmental Organisations (NGOs) are responsible for the country's disaster management. With such a diversity of actors, coordination is critical to the quality of humanitarian assistance provided to host and refugee communities. Disaster management laws, regulations and policies in Bangladesh have institutionalised civil-military coordination between the actors. These provide the framework to govern both the Rohingya response and emergency preparedness and response to natural hazards like monsoons.

This report examines disaster management and coordination policies, structures and mechanisms in Bangladesh. It interrogates the effectiveness and the challenges faced by these different actors today. The 2017 Rohingya Exodus occurred against the backdrop of recovery efforts for Cyclone Mora that hit Bangladesh in May 2017 and preparations for the monsoon season, which began in April 2018 makes it an appropriate example of the challenges faced by the disaster management sector in a complex humanitarian emergency.

This report outlines Bangladesh's disaster risk context and discusses the country's exposure to natural hazards and human-induced disasters, as well as the socio-economic and political factors that make it vulnerable to disaster emergencies. It then examines government policies, structures and mechanisms available that support disaster management and coordination in the context of the Rohingya Exodus, the challenges facing key actors in responding to a human-induced disaster against the backdrop of a looming monsoon season. Finally, the report offers recommendations toward improving disaster governance in Bangladesh.

2. Methodology

This report is prepared based on desk research and in-depth semi-structured interviews with humanitarian and disaster relief practitioners in Bangladesh. For desk research, the authors conducted a literature review of key government policy documents, academic writing and institutional reports on disaster management practices in Bangladesh. The aim is to identify Bangladesh's disaster risks, existing disaster management structures and mechanisms, and the challenges facing them.

Further, 20 semi-structured interviews were conducted during a 10-day fieldtrip between the 20th February and 1st March 2018 in Bangladesh. The interview participants included four government officials, four armed forces officials, one representative of donor agencies, two representatives of the United Nations (UN), five international and two local non-governmental organisations. Participants are based in Dhaka, Teknaf, Ukhia and Cox's Bazar, Bangladesh and were chosen because of their involvement in emergency disaster response coordination in Bangladesh. Participants signed consent forms, which guaranteed anonymity in line with university regulations. The interviews were conducted on a non-attributable basis. Where applicable, participants' responses are quoted directly in this report. The following guiding questions were posed to the participants during the sessions: -

- (i) What coordination mechanisms were developed in Bangladesh disaster management and coordination for humanitarian purposes and how are they implemented?
- (ii) What kind of documents, doctrines, training and codes of conduct guide disaster management and coordination?
- (iii) What are the challenges faced by different disaster response actors in disaster coordination?
- (iv) What have been/should be the measures taken to address the challenges for better coordination in the future?

Effort was made to engage with as many relevant stakeholders as possible and reflect the perspectives of different disaster management and coordination actors in Bangladesh. The researchers also made a site visit to an unofficial refugee camp in Nayapara. Informal conversations with several Rohingya community leaders and local Bangladeshis helped to inform the writers of the nuances of the 2017 Rohingya Exodus. The lack of formal engagement with aid beneficiaries or local communities hosting the displaced Rohingya population is a limitation to this report.

3. Disaster risk context in Bangladesh

Bangladesh has three main rivers - the Ganges, the Brahmaputra/Jamuna and the Meghna, which converge at the centre to become the spine of the country's network of rivers. Dhaka, Bangladesh's capital city, sits in the middle of the Ganges delta. In the summer, the rivers funnel icy water and silt from the melting snow of the Himalayas through Bangladesh before emptying into the Bay of Bengal. Together with rainfall during the monsoon season, an estimated 1,500 billion cubic meters of water flows through Bangladesh's vast river system each year. Apart from the Chittagong Hill Tracts in southeastern Bangladesh, bordering India and Myanmar, it is a country of flat, low-lying floodplains. Two thirds of its broad deltaic plains stand just five meters above sea level.³ Heavy annual rainfall during the monsoon season from June to October expose the country to floods from overflowing rivers. Willem Van Schendel notes that "it is not the amount of water that determines the harmful effects of flooding ... [but] the force with which the water pushes through ... and the number of days it stays on land".⁴ In a normal flood year, about 20 per cent of the country is inundated every summer.

However, in a year of extreme floods, up to 60 per cent of Bangladesh may be submerged.⁵ When this happens, the country sees widespread damage to crops and properties in addition to the loss of lives. As an example, Bangladesh was struck by two consecutive floods in April and August 2017. During the flood, 32 districts in the north and central parts of Bangladesh were submerged, affecting 8 million people and killing at least 140.⁶ The floods destroyed over 620,000 hectares of crops, causing government rice stocks to plunge and food prices to soar by 19.4 percent.⁷ As a result of the flood, access to affected areas were restrained by damaged roads and highways. The World Bank reports that 9,000 km of roads and 457 bridges and culverts as well as 100km of rail lines were damaged. Such destruction continues to negatively affect asset value, wage growth, livelihoods, ability to cultivate land,

³ United Nations Framework Convention on Climate Change (UNFCCC), "Climate Displacement in Bangladesh: The need for Urgent Housing, Land and Property (HLP) Rights Solutions", May 2012, p.9, Available at: https://unfccc.int/files/adaptation/groups_committees/loss_and_damage_executive_committee/application/pdf/ds_bangladesh_report.pdf

⁴ Van Schendel, W. A "History of Bangladesh", Cambridge University Press: Cambridge, 2009, p. 6.

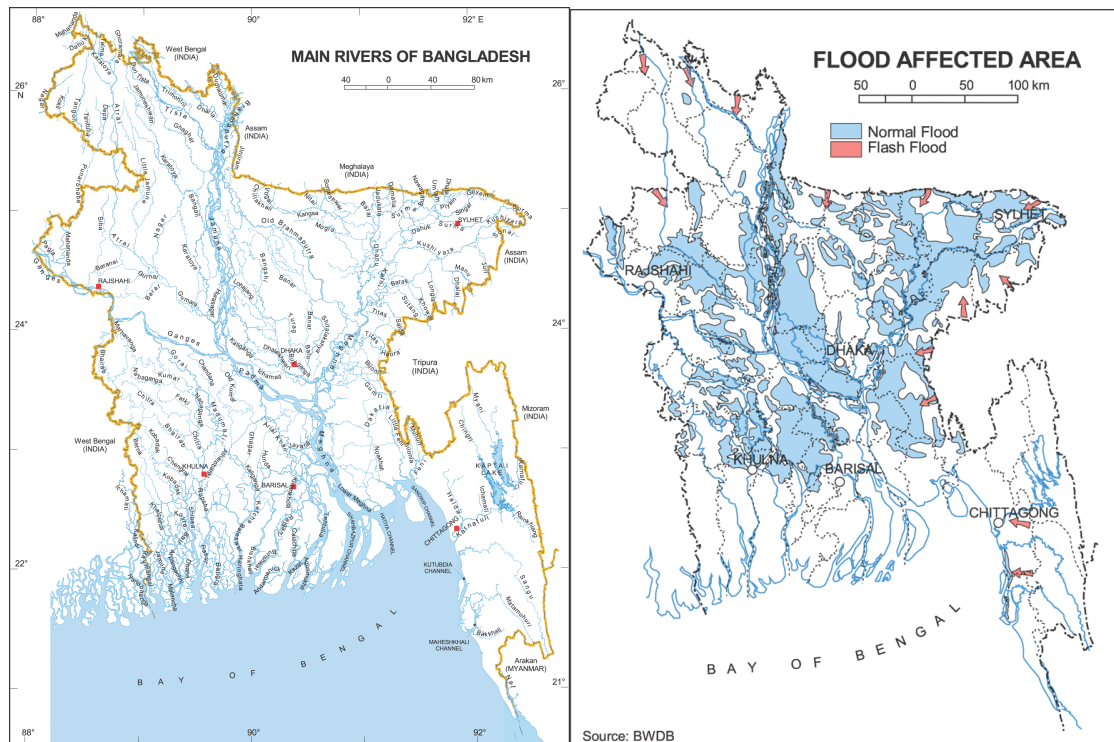
⁵ Razur Rahman and Mashfiqus Saledin, Flood Risks and Reduction Approaches in Rajib Shaw et al (eds), *Disaster Risk Reduction Approaches in Bangladesh*, 2013, Springer Japan, p. 64.

⁶ World Bank, Economic Update September 2017, p.5.

⁷ World Bank, Economic Update September 2017, p.5.

food and water security long after flood water recedes.⁸ This often tips the most vulnerable households into chronic poverty.

Main Rivers and Flood Affected Area in Bangladesh



Source: Bangladesh Water Development Board, n.d.

In the South where the country's coastline faces the Bay of Bengal, coastal communities live in the path of heavy monsoon showers and tropical cyclones from the Indian Ocean. Cyclones generally occur at the beginning of summer (April-May) and towards the end of the rainy season (October-November).⁹ Between 1980 and 2000, the country was hit by an average of 3.43 tropical cyclones a year.¹⁰ During this period, Bangladesh accounted for more than 60 per cent of registered deaths from tropical cyclone hazards worldwide.¹¹ Storm surge is a major cause of death and injury during a cyclone, when coastal communities are

⁸ World Bank, Economic Update September 2017, p.5, Valerie Mueller and Agnes Quisumbing, 2010, Short-and Long-Term Effects of the 1998 Bangladesh Flood on Rural Wages, International Food Policy Research Institute, March, IFPRI discussion Paper 00956.

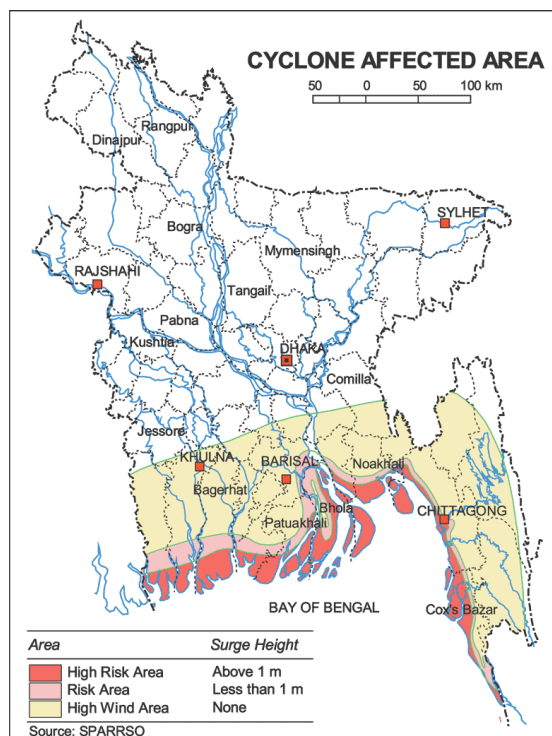
⁹ Sultana Kamrun Nahar Nahida, Md. Iqbal Hossain and Mohammed Kamal Hossain, "Vulnerabilities of Bangladesh to Cyclone Disaster and Adaptation Options: Frequency of Natural Disaster in Bangladesh and its Mitigation Measures", (Saarbrücken: LAP Lambert Academic Publishing, 2012), p.14

¹⁰ UNDP, "Reducing Disaster Risk: A Challenge for Development", UNDP: New York, 2004, Available at: http://www.preventionweb.net/files/1096_rdenglish.pdf

¹¹ UNDP, "Reducing Disaster Risk: A Challenge for Development", 2004, p.35.

vulnerable to high winds with speeds of up to 150mph and waves as high as 20 feet.¹² The destruction of Sunderbans, Bangladesh’s natural barrier of mangroves is one reason for the exaggerated impacts felt by affected communities. Bangladesh has reduced the number of cyclone-related deaths through improvements to early warning systems, mitigation efforts such as building of embankments and cyclone shelters, development of evacuation plans, and raising awareness at the community level.¹³ Some of these improvements are being adapted to the Rohingya refugees such as the Cyclone Preparedness Program, which trains volunteers on communication skills and key preparedness messages. By the end of April 2018, 16 refugee men and 19 refugee women had received the training in Nayapara Camp.¹⁴

Cyclone Affected Area in Bangladesh



Source: Bangladesh Space Research and Remote Sensing Organisation, n.d.

Still, storm surges from a cyclone leaves Bangladesh flooded for weeks with a large amount of saltwater. Floods and cyclones are Bangladesh’s biggest natural disaster risks but the country also sits in one of the most seismically active regions in the world and has had a

¹² Susmita Dasgupta et al., “Cyclones in a Changing Climate: The Case of Bangladesh”, *Climate and Development* 6 (2), 2014, p. 96-110.

¹³ Ubydul Haque et el, “Reduced death rates from cyclones in Bangladesh: What more needs to be done?”, *Bulletin of the World Health Organisation*, 2012, 90 (2), pp.150-156

¹⁴ ISCG, Situation Report: Rohingya Refugee Crisis – Cox’s Bazar, 26 April 2018. Available at https://reliefweb.int/sites/reliefweb.int/files/resources/20180426_iscg_sitrep.pdf

history of severe earthquakes.¹⁵ Although the country has not seen a major earthquake in recent times, geophysicists predict a massive earthquake with a magnitude of between 8.2 and 9 as a result of the Indian plate colliding with the Eurasian plate. The Burma or Sunda plate is also shifting westwards into Bangladesh predicting a forthcoming large earthquake although they are unable to point to a timeline.¹⁶ Bangladesh is also susceptible to salinity intrusion, tornadoes, riverbank erosion, tsunamis, droughts, arsenic contamination, landslides and water logging.¹⁷ These hazards affect different parts of the country and segments of the population to varying degrees but are all recurrent threats and have serious social and economic consequences. Of particular concern with the refugee and host communities in Cox's Bazar is the prospect of floods and landslides, which will affect an estimated minimum of 150,000 people in the monsoon period.¹⁸

Bangladesh has a population of 165 million that equates to 2,889.5 persons per square mile on 56,900 square miles, of which 30 percent is coastal land.¹⁹ Large numbers of this population are exposed to hazard-induced shocks and stress by virtue of living on fertile but hazard-prone lands; their livelihoods depend on the climate-sensitive subsistence economy.²⁰ The Rohingya refugees in Bangladesh are found in a highly dense population around Cox's Bazar, a disaster-prone region. In August 2017, Bangladesh experienced the beginning of what would be the largest single influx of Rohingya refugees into the Teknaf and Ukha sub-districts. Over 650,000 Rohingya crossed the Naf River, which led to the UN High Commissioner for Refugees (UNHCR) declaring a 'Level 3 Emergency'.²¹ Few studies have comprehensively evaluated Bangladesh's disaster management practices and there is a particular gap on how effective its plans and policies are, how the different actors interact, or the success of their collective coordination. Empirical studies are generally limited by evaluations on specific disaster management institutions or policies/plans, type of disaster or disaster risk, geographical location and the type of disaster management. However, the

¹⁵ See Syed Humayun Akhter, "Earthquakes of Dhaka", PhD diss., University of Dhaka, 2010, Available at: http://www.academia.edu/429823/Earthquakes_of_Dhaka

¹⁶ Al Zaman MDA, Monira NJ, "A Study of Earthquakes in Bangladesh and the Data Analysis of the Earthquakes that were Generated in Bangladesh and its' Very Close Regions for the Last Forty Years (1976-2016)", J Geol Geophys 2017, volume 6, p. 300.

¹⁷ See National Plan for Disaster Management 2010-2015, Available at: <http://extwprlegs1.fao.org/docs/pdf/bgd146945.pdf>

¹⁸ UNHCR, Operational Update: Bangladesh 5 – 20 April 2018, available: <https://data2.unhcr.org/fr/documents/download/63289>

¹⁹ World Population Review, "Bangladesh", Retrieved 20 March 2018, Available at <http://worldpopulationreview.com/countries/bangladesh-population/>

²⁰ Bimal Paul and Harun Rashid, *Climatic Hazards in Coastal Bangladesh: Non-Structural and Structural Solution*, Butterworth-Heinemann: Oxford, 2016, p.5

²¹ 'Level' 3' emergencies are "major sudden onset humanitarian crises triggered by natural disasters or conflict which require system-wide mobilisation". See Inter-Agency Standing Committee (IASC), "Humanitarian System-Wide emergency Activation: Definition and Procedures", April 13, 2012, PR/1204/4078/7, Available at: <https://reliefweb.int/sites/reliefweb.int/files/resources/IASC%20System-Wide%20Activation.pdf>

literature does illustrate several challenges to disaster management in the country, which are outlined in the next section. In the makeshift settlements established prior to August 2017, 99 per cent were constructed using bamboo and plastic sheeting, highly vulnerable to the impact of natural disasters including floods and cyclones. The vast majority of new arrivals staying in spontaneous sites had no shelter and stayed in the open air.²² Prior to the relocation of Rohingya refugees around Cox's Bazar and notably in the Kutupalong-Balukhali mega camp many took shelter in the Chittagong Hills Tract. As a diverse non-Muslim region home to Bangladesh's ethnic minorities, the mass movement of the Rohingya refugees into the area caused concern over ethnic balance and political stability.

In terms of the economy, agriculture (mostly rice monoculture) is the key sector in Bangladesh, accounting for nearly 20 percent of GDP and 65 percent of the labour force. Agriculture is a key driver for poverty reduction in Bangladesh.²³ Although non-farm incomes have increased in the last decade, about 87 percent of rural households in Bangladesh still draw some income from agriculture.²⁴ State-driven policy reforms and strategic investments on infrastructure such as irrigation expansion and road connectivity has led to the growth of agriculture productivity. As the country's major food crops such as wheat, rice and maize are seasonal; stress becomes acute in the event of a crop failure or a poor harvest. Floods or droughts magnify the adverse seasonal consequences with irreversible effects on people's livelihoods.²⁵ These risks to farm activities inevitably affect the food and economic security of a large portion of the population in Bangladesh. Coupled with the threat of natural disasters, the local population offered refuge to the large-scale influx of Rohingya from Myanmar into Bangladesh. However, the impact of such a large-scale population movement made food and economic insecurity more acute for both the local and refugee populations. After the mass movement of people into the area, refugees undercut local wage rates, as they would work for cheaper. As a result, ISCG devised an incentive payment scheme, which outlines workers engagement in paid projects and a flat rate of 250 BDT for a five-hour working day whether the worker is from the host or refugee community.²⁶ In Leda camp, for example,

²² ISCG, *Bangladesh: Humanitarian Response Plan September 2017 – February 2018*, ISCG: Bangladesh.

²³ The World Bank, *Economics of Adaptation to Climate Change: Bangladesh*, The World Bank Group: Washington DC, 2010, p.67; The World Bank, "Dynamics of Rural Growth in Bangladesh: Sustaining Poverty Reduction", Report No 103244-BD, May 17, 2016, Available at: <http://documents.worldbank.org/curated/en/951091468198235153/pdf/103244-REPLACEMENT-PUBLIC-Dynamics-of-Rural-Growth-in-Bangladesh-Reformatted-conf-version-May-17.pdf>

²⁴ The World Bank, *Dynamics of Rural Growth in Bangladesh: Sustaining Poverty Reduction*, May 17, 2016

²⁵ Bishawjit Mallick, Khan Rubayet Rahaman and Joachim Vogt, "Coastal Livelihood and Physical Infrastructure in Bangladesh After Cyclone Aila", *Mitigation and Adaptation Strategies for Global Change*, August 2011, 15:6, p. 629-648.

²⁶ ISCG, *Standard Operating Procedure: Cash for Work Programming*, 2018, p.10. Available at https://reliefweb.int/sites/reliefweb.int/files/resources/cwg_sop.pdf

they selected 50-50 host-refugee workers, whereas in Mukti they were taking 70-30 refugee-host community workers in early 2018.²⁷

With the human insecurities faced in Bangladesh, it is also important to recognise the political dynamics that have shaped these. Its history of civilian rule has been regularly punctuated by military interventions into civilian politics and mutinies.²⁸ Bangladesh has had a sustained period of democratic civilian rule since 2009 until the present. Civilian control over the Armed Forces of Bangladesh is vested mainly with the Prime Minister, who also holds the post of Minister of Defence. The Armed Forces Division (AFD), an extension of the Prime Minister's Office (PMO) is the principal organ that coordinates all operations and administrative matters relating to the military.²⁹ The AFD is said to have strict control over promotion, appointment and firing in high-ranking military positions and advises the government on defence and military affairs.³⁰

However, the military remains an entrenched stakeholder in the political system and public institutions. Both the Awami League and their rival Bangladesh Nationalist Party see military support as essential to breaking political deadlocks in their favour, particularly during the pre-election period when a caretaker government is in power. As a result, the armed forces are drawn into party politics and civilian elections. Political parties try to recruit retired army officers to campaign and to build informal networks with soldiers.³¹ Yet retired military officers only make up a small fraction in the National Assembly.³² Further, national intelligence agencies - the National Security Intelligence and the Directorate General of Forces - and paramilitary forces - the Bangladesh Border Rifles and Ansar Bahini - are headed by retired generals and are mostly staffed by military officers.³³ In some administrative districts such as the Chittagong Hill Tracts, the military has direct control - holding decision-making roles, including general administration, law enforcement and

²⁷ Interview with military official, Teknaf, 23 February 2018.

²⁸ See Jeremie Codron, "Putting Factions Back in the Civil-Military Equation: Genesis, Maturation and Distortion of the Bangladeshi Army", *South Asia Multidisciplinary Academic Journal*, (2007), Available at: <http://journals.openedition.org/samaj/230>; Aurel Croissant, David Kuehn, Philip Lorenz and Paul W Chambers, "Bangladesh: From Militarised Politics to Politicised Military" in *Democratisation and Civilian Control in Asia*, Palgrave Macmillan: London, 2013.

²⁹ Syed Imtiaz Ahmed, "Civilian Supremacy in Democracies with 'Fault Lines': The Role of the Parliamentary Standing Committee on Defence on Bangladesh", *Democratization* 13 (2), 2006, pp.290-291.

³⁰ Ahmed, "Civilian Supremacy in Democracies with 'Fault Lines': The Role of the Parliamentary Standing Committee on Defence on Bangladesh", 2006, p.291; Croissant, Lorenz and Chambers, "Bangladesh: From Militarised Politics to Politicised Military", p.122.

³¹ Wolf, "Civil-Military Relations and Democracy in Bangladesh", 2013, p.31.

³² Wolf, "Civil-Military Relations and Democracy in Bangladesh", 2013, p.31; Croissant, Lorenz and Chambers, "Bangladesh: From Militarised Politics to Politicised Military", 2013, p.123.

³³ Croissant, Lorenz and Chambers, "Bangladesh: From Militarised Politics to Politicised Military", p.124.

development and conducting military operations.³⁴ The Chittagong Hill Tracts is the homeland of indigenous non-Muslim peoples. The majority Muslim Rohingya refugees from Myanmar initially settled in the Chittagong Hill Tracts causing concern among the indigenous groups that their presence would undermine the area's ethnic balance. Subsequently the Bangladesh government consolidated the refugee population into the neighbouring district at Kutupalong camp, which is now the world's largest and most densely populated refugee camp.³⁵

In addition, the military has substantial corporate and economic interests in the country. Through its welfare trust Sena Kalyan Sangstha and various business subsidiaries, the Bangladesh Armed Forces' business empire spans across the construction, real estate, flour milling, textile manufacturing, food and beverage, hospitality and banking sectors.³⁶ Several writers argue that substantial corporate and financial interests ensure the military takes abiding interests in civilian politics and would be more disposed to intervene if it perceives risks to its interests.³⁷ Others like Rashed Uz Zaman and Niloy Ranjan Biswas argue, however, that economic interests such as the military's involvement in UN peacekeeping mission depended on good relations with civilian governments, thus increasing civilian leverage over the armed forces.³⁸ While these economic interests provide an important source of income for the military, it also allowed the armed forces to help the district administration to distribute relief goods, build roads, and construct 10,000 latrines for the refugee population in the absence of local private sector capacity.³⁹ An INGO participant working in the WASH sector said the military is more likely to "maintain the quality better

³⁴ Unrepresented Nations & Peoples Organisation, "Chittagong Hill Tracts: Parbatya Chattagram Jana Samhati Samiti Statement on 20th Anniversary of CHT Accord", December 2, 2017. Available at: <http://unpo.org/article/20495>, Accessed on December 4, 2017

³⁵ Altman, M. J., Rohingya Crisis: A Firsthand Look into the World's Largest Refugee Camp, WFP-USA, 14 February 2018. Available at: <https://wfpusa.org/articles/a-firsthand-look-into-the-worlds-largest-refugee-camp/>, Accessed on 5 June 2018.

³⁶ Joyeeta Bhattacharjee, "The Bangladesh Army: Documenting its Corporate Interests", ORF Occasional Paper 17, Observer Research Foundation, October 2012, Available at: https://www.orfonline.org/wp-content/uploads/2010/11/OccasionalPaper_17.pdf

³⁷ Joyeeta Bhattacharjee, "The Bangladesh Army: Documenting its Corporate Interests", *Observer Research Foundation*, ORF Occasional Paper 17, October 2010, International Crisis Group, "Mapping Bangladesh's Political Crisis", *Asia Report* 264, 9 February 2015, p.25

³⁸ Croissant, Lorenz and Chambers, "Bangladesh: From Militarised Politics to Politicised Military", 2013, p.129; Rashed Uz Zaman and Niloy Ranjan Biswas, "Bangladesh's Participation in UN Peacekeeping Missions and Challenges for Civil-Military Relations: A Case for Concordance Theory", *International Peacekeeping* 21 (3), 2014, p. 339; C.S.R. Murthy, 'Unintended Consequences of Peace Operations for Troop-Contributing Countries from South Asia', in Chiyuki Aoi, Cedric de Coning and Ramesh Thakur (eds), *Unintended Consequences of Peacekeeping Operations*, UN University Press: Tokyo, 2007, p.160; Shekh Mohammad Altafur Rahman, "Democratisation in Bangladesh: An Analysis of Bangladesh's Armed Force's Non-Intervention in Politics Influenced by the Participation in United Nations Peacekeeping Operation", *Nepalese Journal of Public Policy and Governance* 30 (1), 2012, pp.47-60.

³⁹ Interview with government official, Cox's Bazar, 22 February 2018.

than other agencies” and “can also finish [the works] fast”. In terms of capacity-building, the armed forces have played an important role, and transferring their knowledge to other sectors is important.

4. Disaster Management and Coordination in Bangladesh

Disaster management in Bangladesh is characterised by its complex institutional structures, as well as the number of government stakeholders for policymaking and coordination for disaster management operations. The disaster management regulatory framework is provided by the Disaster Management Act 2012 (DMA) and the Standing Orders on Disaster (SOD).⁴⁰ The DMA defines a disaster as:

‘any such incidents mentioned below created by nature or human or created due to climate change and its massiveness and devastation cause such damage...or create such level of hassle to that community whose own resources, capability and efficiency is not sufficient to deal with and relief and any kind of assistance is needed to deal with that situation.’

Of particular relevance for the Rohingya influx is its reference in the DMA under (f) that ‘any unnatural incident or a misfortune causing massive life loss and damage.’ Unnatural incidents or deaths include events such as executions, murder, acts of terrorism, and war, all of which have been identified in different forums as the catalysts for the Rohingya exodus. The DMA determines what disaster management activities are undertaken, and which agency is responsible for them.⁴¹ The SOD outlines disaster management arrangements and specifically defines the roles and responsibilities of government ministries, departments, the armed forces, national and subnational disaster management committees as well as the Red Cross/Red Crescent Movement before, during and after a disaster occurs. The National Plan for Disaster Management, a policy document prepared by the Ministry of Disaster Management and Relief (MoDMR) offers strategic direction and implementation guidelines to the DMA and SOD. Revised every five years, the plan aligns the national framework with international policy drivers for disaster management. Other hazard specific disaster management plans, include the Climate Change Strategy and Action Plan, Flood Action Plan and the Cyclone Preparedness Program, which complement the National Plan for Disaster

⁴⁰ The Standing Orders on Disaster was reviewed in 2017, the second time this is done since its introduction in 1997. Government of the People’s Republic of Bangladesh, “Standing Orders on Disaster”, April 6, 2010, Available at: https://www.preventionweb.net/files/18240_sodapprovedbyndmb.pdf

⁴¹ Disaster Management Act 2012, Available at: <http://emi-megacities.org/wp-content/uploads/2015/03/Disaster-Mgt-Act-2012-English.pdf>

Management.⁴² Collectively, these plans provide implementation guidelines to existing disaster management laws and policies.

The MoDMR functions as the government's focal point for operationalising disaster management plans in Bangladesh. At the national and subnational levels, public office holders are organised in committees to facilitate the practical implementation of disaster management policies. There are 12 disaster management committees (DMC) at the national level; each has specific responsibilities ranging from reviewing disaster management systems and policies, evaluating disaster preparedness, response and recovery measures, facilitating coordination and approving plans for risk reduction and emergency response. At the local level, every administrative district has a DMC with clear responsibilities, organised based on each phase of the disaster cycle – risk reduction, emergency preparedness, emergency response and recovery.

In September 2013, the Bangladeshi government announced their National Strategy on Undocumented Myanmar Nationals and Refugees. The government initiated a response to the refugee influx across national ministries and agencies, and allocated 2,000 acres of forestry land for the establishment of a new camp to the west of Kutupalong. The MoDMR is the coordinating ministry to consolidate the population in the new camp. The District Authority established a mechanism for donations to direct private cash donations where it is needed most. The district health complex provides urgent medical attention, while the department of Public Health Engineering deployed resources to provide water in spontaneous settlements. Local communities have provided the first wave response offering food and basic items to the new arrivals. The Department of Immigration and Passports has implemented biometric registration of the refugees with the support of UNHCR. The National Task Force (NTF), chaired by the Foreign Secretary with 22 ministries and agencies monitor the national strategy and oversee the influx response. At the district level, a District Task Force (DTF) monitors and coordinates on the ground, led by the Deputy Commissioner and includes ministries like MoHA, MDMR, MoCHTA, MoC and different line agencies like the NGO Bureau, BBS, ERD, LGD and the security and intelligence agencies.⁴³

However, some researchers note discrepancies between official disaster management policies and the realities on the ground.⁴⁴ Policymaking on disaster management remains a

⁴² See National Plan for Disaster Management 2010-2015, Available at: <http://extwprlegs1.fao.org/docs/pdf/bgd146945.pdf>

⁴³ Humanitarian Response Plan, Rohingya Refugee Crisis, September 2017 – February 2018, Available at: https://reliefweb.int/sites/reliefweb.int/files/resources/2017_HRP_Bangladesh_041017_2.pdf

⁴⁴ See, for example, Shohid Mohammad Saidul Huq, "Community Based Disaster Management Strategy in Bangladesh: Present Status, Future Prospects and challenges", *European Journal of Research in Social Sciences*

technocratic, top-down process where local level participation is limited,⁴⁵ which was confirmed during fieldwork. Rabiul Islam and Greg Walkerden argue that policy documents and government reports emphasise linking networks at the top levels of government, stressing relationships between government institutions, foreign states, regional forums, international bodies and foreign donors, while neglecting grassroots networks and their contribution to disaster recovery.⁴⁶ In assessing the country's disaster policy, Rabiul Islam and Greg Walkerden find there was virtually no direct involvement of communities affected by climate change.⁴⁷ Saidul Huq finds that major hindrances to community participation in disaster management include the prevailing notion that relief is the responsibility of state institutions, a lack of resources for community-based programmes, and an absence of coordination forums with local communities.⁴⁸ Many local civil society organisations working with the Rohingya, however, do not want to go under the umbrella of the ISCG. These organisations feel that they have already been working with the Rohingya community, are coordinated by the government, and do not understand why they should be coordinated by ISCG as well.⁴⁹ Emdad Haque and Salim Uddin observe that partnerships between the Government of Bangladesh and other stakeholders in disaster management "remains largely on paper".⁵⁰ While high-level decision-makers are aware of the need to institute reform, community and local government engagement by the central government remains nascent. This contrasts with the RRRC, which receives the majority of its funding from the international community through UN agencies. While the top executives are from the government, the lower ranking and majority of staff are from the project office, which receives funding from UNHCR.⁵¹

The literature also indicates that implementation of national disaster management policies at the local level is uneven despite detailed directives by the SOD. Mohammad Harun assesses implementation of the SOD directive at the Union level in two disaster-prone districts - the Kakua and Monsurnagar Unions – and concludes that there is a mismatch of

5:2, 2016, pp.22-35; Umma Habiba and Rajib Shaw, "Bangladesh Experiences of Community-Based Disaster Risk Reduction" in Rajib Shaw (eds), *Community-Based Disaster Risk Reduction (Community, Environment and Disaster Risk Management)*, Emerald Group Publishing, 2012, pp. 91-111.

⁴⁵ Afroza Parvin and Cassidy Johnson, "Disaster Vulnerability in the Policy Context of Bangladesh: A Critical Review" in W. Leal Filho (eds.), *Handbook of Climate Change Adaptation*, Springer-Verlag Berlin Heidelberg: Berlin, 2015, pp.878-899.

⁴⁶ Rabiul Islam and Greg Walkerden, "Social Networks and Challenges in Government Disaster Policies: A case study from Bangladesh", *International Journal of Disaster Risk Reduction* 22, 2017, p.7; pp. 325-334.

⁴⁷ Ibid.

⁴⁸ Huq, "Community Based Disaster Management Strategy in Bangladesh", p.31

⁴⁹ Interview with Deputy Secretary at the RRRC, Cox's Bazar, Bangladesh, 22 February 2018.

⁵⁰ Haque and Uddin, "Disaster Management Discourse in Bangladesh: A Shift from Post-Event Response to the Preparedness and Mitigation Approach Through Institutional Partnerships", 2013, p.49.

⁵¹ Interview with government official, Cox's Bazar, 22 February 2018.

DMC capacity and the scope of work assigned.⁵² He finds that the Union DMC Chairmen have very poor knowledge on the SOD, the phases of disaster management and are unaware of their responsibilities to hold frequent meetings for disaster management planning. The Union DMCs that were studied also do not have their own Contingency Plan (required by the SOD) and continue to view their role as limited to facilitating post-disaster response and rehabilitation.⁵³ Tofayel Ahmed, Haruna Moroto, Saiko Sakamoto and Akiko Matsuyama come to a similar conclusion on local DMCs capabilities, noting that local-level DMC members do not receive formal training on disaster management nor have ready access to disaster management policies and guidelines.⁵⁴ The study adds that it is unclear how or if national agencies like the IDMCC or the MoDMR monitor local-level DMCs. Nor is it clear if subnational DMCs receive the necessary budget allocation necessary for executing disaster management plans.⁵⁵ Whilst there is clear awareness of high-level decision-makers over the need to devolve power and activity to local levels, it has not gone hand-in-hand with an investment in capacity. This has led to more indecision and ineffective policy implementation within the national disaster management system.

Since 25 August 2017, violence targeted at the Rohingya population has led to the exodus of 671,000 people from Myanmar to Bangladesh. Local communities were still recovering from the impact of Cyclone Mora that hit the district in May 2017 when the first arrivals of Rohingya refugees appeared at the end of August 2017. The Cox's Bazar district is an area exposed to pre-monsoon cyclones from April to May and monsoon rains from October to November annually. Many of the arrivals are women and unaccompanied children who were physically injured and deeply traumatised, having lost their homes and family members. At least 58 percent of Rohingya refugees are children. Prior to this influx, Bangladesh was already hosting 303,070 Rohingya or what the Government of Bangladesh refers to as "forcibly displaced Myanmar Nationals" in unofficial settlements in the upazilas of Teknaf and Ukhia in Cox's Bazar. This is in addition to the 34,000 Rohingya officially recognised as refugees living in two camps managed by UNHCR in Nayapara and Kutupalong. The Rohingya population occupies a sprawling complex of shelters built with bamboo and plastic sheets on 4,800 acres of reserve forestland in Cox's Bazar allocated by the Government of Bangladesh. Many living within the camps are still in need of urgent life-saving assistance.

⁵² Mohammad Harun, "Implementing Standing Orders on Disaster at Union Level: The Case of Kakua Union, Tangail District and Kazipur Union of Sirajganj District, Bangladesh", Masters diss., BRAC University, 2008.

⁵³ Mohammad Harun, "Implementing Standing Orders on Disaster at Union Level: The Case of Kakua Union, Tangail District and Kazipur Union of Sirajganj District, Bangladesh", 2008, pp.30-33.

⁵⁴ Tofayel Ahmed, Haruna Moroto, Maiko Sakamoto and Akiko Matsuyama, "Exploring Implementation Gaps between Policy and Practice for Disaster Management in Bangladesh", *Journal of Integrated Disaster Risk Management* 6 (2), 2016, p.96.

⁵⁵ Tofayel Ahmed, Haruna Moroto, Maiko Sakamoto and Akiko Matsuyama, "Exploring Implementation Gaps between Policy and Practice for Disaster Management in Bangladesh", 2016, pp. 79-101.

At the time of writing, the humanitarian community is still operating in the emergency response phase. Refugee arrivals from Myanmar have slowed but have not stopped. The governments of Bangladesh and Myanmar have signed a Memorandum of Understanding on 23 November 2017 for the “safe, voluntary and dignified” repatriation of displaced Rohingya population to Myanmar. The deal was reached without the involvement of the international community and its operationalisation is unclear. However, references to the United Nations and its agencies were included along with a commitment to international law. In February 2017, Bangladesh handed a list of 8,032 “eligible returnees” to the Burmese government for repatriation but it was reported that Myanmar was willing to accept less than 400 Rohingya on the list.⁵⁶

The Cox’s Bazar district is vulnerable to natural hazards like the pre-monsoon cyclone season (April-June) and monsoon rains (October-November). The Rohingya population is expected to be particularly exposed to heavy wind, flooding and landslides. The Government of Bangladesh and the humanitarian community are cooperating to implement disaster preparedness activities for the local and refugee populations. In March 2017, the humanitarian community led by the ISCG and the Strategic Executive Group worked with the Government to draw up a Joint Response Plan (JRP) that requests US\$951 million to support humanitarian assistance including food, water, sanitation, shelter and medical care to 1.3 million Rohingya refugees and local host communities for the period of March-December 2018.⁵⁷

One of the greatest challenges to disaster management in Bangladesh is the sheer number of agencies and mandates, which increases the likelihood of overlap and ineffectiveness. The table below outlines the fourteen bodies that govern or advise key decision-makers on natural disaster management in Bangladesh. Much of the capacity remains at the top echelons of society in the bureaucracy and with politicians, while local government and communities are left behind. This compares to the Office of the Refugee Relief and Rehabilitation Commission (RRRC) also reflected below, which was established to govern the Rohingya refugees who fled into Bangladesh in the early 1990s. The Commission office is located within the Ministry of Disaster Management and Relief (MoDMR) but ‘out-posted’ to Cox’s Bazar. Initially, the RRRC was tasked with overseeing the 34,000 registered refugees only. Since the most recent influx from 25 August 2017 onwards, the RRRC now

⁵⁶ Hannah Ellis-Peterson, “Myanmar willing to take back fewer than 400 Rohingya refugees”, *The Guardian*, March 15, 2018. Available at: <https://www.theguardian.com/world/2018/mar/15/myanmar-willing-to-take-back-fewer-than-400-rohingya-refugees-bangladesh>

⁵⁷ ISCG, “Joint Response Plan for Rohingya Humanitarian Crisis March-December 2018.” Available at: <http://www.unocha.org/sites/unocha/files/JRP%20for%20Rohingya%20Humanitarian%20Crisis%202018.PDF>

oversees the entire refugee population. The precursor ministry to MoDMR⁵⁸ was the largest recipient of financial support from the UNHCR, with allocations reaching 20 percent of the UNHCR's operational budget in 2011. The UNHCR paid mission allowances to MFDM personnel seconded to the RRRC office in Cox's Bazar as well as the salaries of some 130 RRRC personnel hired locally in the Cox's Bazar area. As a result of international financial support, the capacity at a more localised level with the RRRC is greater than at the local level within the disaster management structure overseeing natural hazards. However, the greatest challenge is how these two structures work together when natural disaster affects the Cox's Bazar area, particularly since the most recent exodus of Rohingya refugees into Bangladesh.

The 2017 Rohingya Exodus fits uneasily with conventional government disaster management modalities. The DMA defines 'disaster' broadly but the SOD is understood by all stakeholders to be irrelevant for responding to Rohingya influxes. As such, the Government's disaster management structures have been successful at managing natural disasters like floods and cyclones but untested in conflict-induced or largescale disasters like a high magnitude earthquake or large population movements until last August.

The PMO directive issued in mid-September framed the emergency response to the Rohingya influxes in 2017. It created an ad hoc and centralised disaster management coordination structure for responding to displaced Rohingya that runs parallel to what responds to natural disasters like floods and cyclones. With that, the RRRC took over relief coordination and authorises site-management and planning for refugee settlements. Correspondingly, the DC and HCTT will serve the local Bangladeshi population. It is unclear how the two coordination structures will interact with each other in the event of a natural disaster hitting both populations in Cox's Bazar. For instance, questions on how duties such as conducting needs assessment and drafting emergency response plans will be split during an emergency or how evacuations could be done when the mobility of Rohingya populations are restricted still need to be answered for disaster preparedness to be meaningful. The Bangladesh authorities in conjunction with the Bangladesh Red Crescent Society and American Red Cross have been training local residents in cyclone preparedness programmes (CPP) since 1972. Most recently, with the support of IOM and other partners,

⁵⁸ In 2012 the government of Bangladesh reorganized the Ministry of Food and Disaster Management (MFDM) as the Ministry of Food and another separate ministry was created called the Ministry of Disaster Management.

those skills are being shared with the refugees tasked with saving others in emergency events.⁵⁹

National Level Disaster Management Institutions				
Ministerial Level	National Disaster Management Council (NDMC)	Headed by the Prime Minister to formulate and review disaster management policies and issue directives to all concerned.		
	Inter-Ministerial Disaster Management Coordination Committee (IDMCC)	Headed by the Minister for Disaster Management and Relief to implement disaster management policies and the decisions of the NDMC/government.		
	National Disaster Management Advisory Committee (NDMAC)	Headed by an experienced person nominated by the Prime Minister.		
	National Task Force (NTF)	Chaired by the Foreign Secretary with 22 ministries and agencies to monitor the national strategy and oversee the Rohingya influx response.		
	Ministry of Disaster Management and Relief (MDMR)	Government ministry to reduce the risk of people, especially the poor and the disadvantaged, from the effects of natural, environment and human induced hazards to a manageable and acceptable humanitarian level and to have in place an efficient emergency response management system.		
		Natural Disaster	Human-induced Disaster	
Ministry HQ Level	Disaster Management Bureau (DMB)	To improve the capacities of disaster management stakeholders and coordinate disaster management policy issues in favour of MoDMR.	Office of the Refugee Relief and Rehabilitation Commission (RRRC)	Provide oversight of entire refugee population.
	Department of Disaster Management (DDM)	Implement disaster management programmes in the field; particularly mitigation, preparedness (evacuation routes, disaster shelters, etc.), and relief and rehabilitation activities.		
	Committee for Speedy Dissemination of Disaster-Related	Headed by the Director General of DMB to examine, ensure, and find ways and means for rapid dissemination of warnings to the		

⁵⁹ Akhter, Shirin, 'Finding Safety Together: Rohingya Refugees, Local Villagers, IOM, Partners Join Forces with Bangladesh Authorities to Prevent Disaster,' IOM Press Release, 1 June 2018. Available at: <https://www.iom.int/news/finding-safety-together-rohingya-refugees-local-villagers-iom-partners-join-forces-bangladesh> Accessed: 5 June 2018.

	Warning/Signals (CSDWS)	people.		
	Focal Point Operation Coordination Group of Disaster Management (FPOCG)	Headed by the Director General of DMB to review and coordinate the activities of various departments or agencies involved in disaster management and to review the contingency plans prepared by relevant departments.		
	NGO Coordination Committee (NGOCC)	Headed by the Director General of DMB to review and coordinate the activities of NGOs working in the field of disaster management.		
	Disaster Management Training and Public Awareness Building Task Force (DMTAFB)	Headed by the Director General of the Disaster Management Bureau to coordinate the disaster-related training and public awareness activities of the government, NGOs, and other organisations.		
Local Level Disaster Management Institutions				
Local Government Level	District Disaster Management Committee (DDMC)	Headed by the Deputy Commissioner (DC) to coordinate and review disaster management activities at the district level.	District Task Force (DTF)	Led by the District Commissioner to monitor and coordinate the national strategy and influx response on the ground.
	City Corporation Disaster Management Committee (CCDMC)	Headed by the Mayor of the city corporation to coordinate, review, and implement disaster management activities within its area of jurisdiction.		
	Pourashava Disaster Management Committee (PDMC)	Headed by the Mayor of the city corporation to coordinate, review, and implement disaster management activities within its area of jurisdiction.		
	Upazila Disaster Management Committee (UzDMC)	Headed by an 'Upazilla' Nirbahi Officer' (UNO) to coordinate and review disaster management activities at the "upazilla" level.		
	Union Disaster Management Committee (UDMC)	Headed by the Chairman of the Union Parishad to coordinate, review, and implement disaster management activities in its particular union.		

Source: Authors 2018

4.1 The role of the civilian government

Although the local government in Cox's Bazar district are accustomed to responding to natural disasters and population movements, the scale of the 2017 Rohingya Exodus caught local authorities and the humanitarian community off-guard. No one was able to predict the refugee influx was going to be so significant but the community is used to responding to it every two years. "In 2016, there were 74,000 [Rohingya refugees] ... The first week was unbelievable, 100,000 people. We were still coordinating [the response] for Cyclone Mora that has not finished ... It has been chronic emergencies since October 2016."⁶⁰

Participants described the operating environment during the first days of the influx as "chaos", "simply crazy", "dirty and nasty" and "disorganised". Rohingya refugees were stranded along roadsides without assistance, disrupting traffic and creating safety risks. Spontaneous settlements formed and grew quickly in Teknaf and Ukhia as new arrivals clear forest land and hills to build shelters. Host communities were the first responders - providing food and shelter to the new arrivals. The DC in Cox's Bazar offered cooked meals and blankets and ushered the Rohingya refugees towards existing unofficial settlements in Kutupalong by broadcasting announcements through loud speakers.⁶¹ Two local government officials interviewed said that they were overwhelmed with providing for the population in need, managing the volume of incoming relief materials through ad-hoc distribution of relief materials, and cash by non-traditional actors along main roads.⁶² At this stage, a coherent coordinated response was absent. One government official said: -

"Private donor relief came and it was tough for the civilian administration to distribute the huge relief goods donated by private organisations ... Initially, we did not bother with coordination. As many actors came, we welcomed them and their help ... We did not have any government framework."⁶³

In mid-September, the PMO issued a directive for a coordinated approach for responding to the 2017 Rohingya Exodus. It directed, inter alia, that (i) MODMR lead the coordination for the emergency response with other stakeholders such as the AFD, the RRRC, UNHCR and the UN Migration Agency;⁶⁴ (ii) the deployment of armed forces to Cox's Bazar to manage the distribution of relief items; (iii) all government ministries, departments and organisations were required to appoint a focal point officer for coordination; (iv) the building of 14

⁶⁰ Interview with representative of the ISCG WASH Sector Coordination Unit, Cox's Bazar, Bangladesh, 25 February 2018

⁶¹ ISCG, "Situation Report: Influx (August 2017)", 11 September 2017.

⁶² ISCG, "Situation Report: Influx (August 2017)", 11 September 2017.

⁶³ Interview with Deputy Secretary at the RRRC, Cox's Bazar, Bangladesh, 22 February 2018

⁶⁴ More commonly referred to in the field by its previous name, International Organisation for Migration (IOM).

temporary warehouses by the WFP; (v) the AFD to manage and transport incoming relief materials at airports to Cox's Bazar; (vi) for the DC to receive and manage the distribution of relief items; (vii) and line ministries to coordinate with other stakeholders for the provision and construction services like healthcare and sanitation facilities.

In the initial phase of the response, the RRRC led the Site Planning Taskforce for the development of the Kutupalong Expansion site on 2,000 acres of undeveloped forest land allocated by the Government of Bangladesh with implementing agencies like the IOM and UNHCR. The site was subsequently expanded to become the Kutupalong-Balukhali mega camp. Refugee settlements were organised in blocks/zones, with military focal points appointed for each block.⁶⁵ Later, RRRC shifted the administration boundaries from zones to camps and appointed a Camp in Charge (CiC) to lead the administration and coordination of each camp and are supported by site managers from humanitarian organisations.⁶⁶ In October 2017, 20 CiCs were deployed on short term rotations. The number is expected to rise to 30 CiCs covering 30 locations, out of which 23 are located within the mega camp.⁶⁷ Other sites with more dispersed settings will be looked after by sectoral humanitarian agencies.

The civilian government is also directly involved with coordinating sector-based service delivery to the refugee population within refugee settlements. On the premise of ensuring effective aid delivery and identifying protection needs, the RRRC and UNHCR initiated a family counting exercise to determine refugee numbers, needs and vulnerabilities. Those who are registered are issued a card and an identifier number, although a government official interviewed said that registration is not a prerequisite to receiving aid.⁶⁸ Inter-sector meetings are held weekly and are attended by sector coordinators/leads to ensure coordination not only within but also between sectors and government representatives. Stakeholders described RRRC's work as creating an "enabling environment for life-saving interventions".⁶⁹ Its role as a "bridge between the government and the [other] actors"⁷⁰ was cited as useful for obtaining government approvals for and overseeing implementation of technical interventions.

⁶⁵ ISCG, "Situation Update: Rohingya Refugee Crisis", 26 September 2017.

⁶⁶ Camp-in-Charge is a government official who facilitates daily administration, coordination and delivery of services to refugee camps. He also oversees the maintenance and repair of facilities in the camps. CiCs were appointed for the management of registered camps in Kutupalong and Nayapara.

⁶⁷ "Joint Response Plan for Rohingya Humanitarian Crisis March-December 2018", pp. 30-31.

⁶⁸ A separate biometric registration exercise is conducted by the Department of Immigration and Passport to facilitate the repatriation of Rohingya refugees to Myanmar.

⁶⁹ Interview with representative of the ISCG WASH Sector Coordination Unit, Cox's Bazar, Bangladesh, 25 February 2018

⁷⁰ Interview with Deputy Secretary at the RRRC, Cox's Bazar, Bangladesh, 22 February 2018

One INGO representative said:

“With RRRC, we are getting very great support from the beginning when we explain the issues [we face] ... For example, there was a water emergency in Teknaf in the dry season [that is] ongoing. We discussed [this] with RRRC and RRRC helped us to expand the intervention to provide safe water. When we came up with the unified sanitation technology design ... [we received] approval of DPHE with the help of RRRC.”⁷¹

A government official said:

“The NGO Affairs Bureau normally issues the FD7 or FD6. They issue this letter, approve the FD7 and FD6 and that letter goes to [the] DC for supervision of works of that particular NGO. That is common all over Bangladesh. But, here it is different. In the camp area, the district commissioner does not have any network. The network is under RRRC ... DC sends all the FD7 to [the RRRC] office to take necessary action.”⁷²

However, some noted that despite RRRC’s “flexibility”, there are limitations to its capacity as a district-level administrator. One participant from the donor community said that approvals for relief programs are “held up at the central level”.⁷³ Most of the non-state actors interviewed said that there are delays in obtaining FD7 approvals, which does not fall under the jurisdiction of the RRRC or MoDMR leading to a delay in program implementation.

4.2 The role of the Bangladesh Armed Forces

Within the DMA and the SOD, the military occupies a space equal to that of its civilian counterparts. The Chiefs of Staff of the Army, Navy and Air Force sit at the apex as policy makers on the NDMC, reviewing national systems and giving strategic advice on disaster management. At the inter-ministerial IDMCC, the Principal Staff Officer from AFD oversees the implementation of disaster risk reduction and emergency response management with its civilian colleagues.⁷⁴ The AFD is responsible for coordinating the employment of the armed forces in disaster management and overall relief operations.

According to the SOD, the military shoulders a significant portion of critical tasks as primary responders during the disaster response stage - emergency evacuation, search and rescue,

⁷¹ Interview with representative of the ISCG WASH Sector Coordination Unit, Cox’s Bazar, Bangladesh, 25 February 2018

⁷² Interview with Deputy Secretary at the RRRC, Cox’s Bazar, Bangladesh, 22 February 2018

⁷³ Interview with representative of the donor community, Baridhara, Dhaka, Bangladesh on 26 February 2018

⁷⁴ See Standing Orders on Disaster, pp.1 – 174.

removal of dead bodies and debris, provide medical services, temporary shelter, damage, loss and needs assessments, transport, distribution of relief goods and logistics.⁷⁵ The military has a presence throughout the country and are able to respond quicker and on a larger scale than civilian actors can. The military is officially involved in disaster response, relief and rehabilitation in “aid to the civil power” at the request of the government. In practice, however, the armed forces may take a lead role. In the Disaster Response Exercise and Exchange (DREE), an annual simulation exercise for responding to an earthquake, the AFD leads civil-military and military-military coordination. All participants said the decision to deploy the armed forces in response to the most recent Rohingya influx was critical to bringing “the situation under control”. At the time of the interviews, there were 17,000 military personnel stationed in Cox’s Bazar.

An AFD representative is stationed at the coordination centre in Ukhia, directing incoming aid that comes through the district administration to different camps. The government established distribution points to curb ad hoc activities by spontaneous local volunteer groups. Participants felt that the military brought order and discipline to actors. On camp sites where there are no CiCs⁷⁶ appointed, the Bangladeshi Army is responsible for daily administration - assisting with biometric registration of Rohingya refugees, managing disputes between the Rohingya and local populations, attending coordination meetings with other stakeholders and directing new arrivals to RRRC for biometric registration. INGO participants said that the military were helpful in site selection for technical interventions such as the construction of a sludge treatment plant and health posts when finding adequate space is difficult in congested camps.

Further, Bangladesh is the second largest contributor to UN peacekeeping personnel globally.⁷⁷ Their involvement with international peacekeeping operations hints at the Bangladesh military’s capabilities in responding to conflict-induced emergencies in addition to those caused by natural hazards.⁷⁸ Rashed Uz Zaman and Niloy Ranjan Biswas find that interaction with other peacekeepers enhances operational competency, normalises values such as consent, impartiality, non-use of force except in self-defence, and the concept of

⁷⁵ See Standing Orders on Disaster

⁷⁶ Camp in Charge are government officials designated by RRRC, under the MoDMR to manage refugee settlements.

⁷⁷ United Nations Peacekeeping, “Troops and Police Contributions: Ranking of Contributions by Country as of October 2017”, Available at: <https://peacekeeping.un.org/en/troop-and-police-contributors>, Accessed on December 18, 2017.

⁷⁸ Kabilan Krishnasamy, “Bangladesh and UN Peacekeeping: The Participation of a ‘Small State’”, *Commonwealth and Comparative Politics* 41 (1), 2003, p.37.

civilian control over the military, among Bangladeshi soldiers and officers.⁷⁹ Some studies raise questions about the quality of the military participating in disaster management and emergency response. Kabilan Krishnasamy notes, for instance, that Bangladeshi soldiers have been removed from peacekeeping missions for lack of discipline.⁸⁰

However, the existing literature has generally neglected to examine the role of the Bangladesh armed forces as a disaster manager, coordinator and responder. Critical questions, including the military's relationship with civilian actors, its interaction with and perception of affected communities, the integration and application of humanitarian operations in military decision-making and operational frameworks, effectiveness of civil-military and military-military coordination frameworks to effectively deliver assistance, are unanswered.

4.3 The role of non-state actors

Outside the state apparatus, disaster management work operates through a vast network of international development donors, United Nations agencies, local and international NGOs. Bangladesh is the sixth largest recipient of overseas development assistance in Asia, receiving US\$2.57 billion in 2015.⁸¹ Multilateral organisations and NGOs are the main channel of delivery of humanitarian aid in Bangladesh.⁸² Various international and local humanitarian NGOs organise themselves through various coalitions, consortia and networks. For instance, the National Alliance for Risk Reduction and Response Initiatives (NARRI) Consortium, and the Bangladesh Developing and Strengthening Humanitarian Assistance and Risk Reduction Initiatives (DeSHARI) are two coalitions of international humanitarian NGOs. These consortia coordinate humanitarian interventions through information sharing and standardisation of disaster response packages to affected communities. The government retains oversight of NGO disaster-related activities through the NGO Affairs Bureau. NGOs are required to submit project proposals in a form called FD-6 to the NGO Affairs Bureau, detailing the project rationale, objectives, and source of funding. FD-6 submissions are approved within 45 days. During an emergency, the NGO Affairs Bureau approves NGO proposals (mainly distribution of relief materials) based on a form called FD-7

⁷⁹ Rashed Zaman and Niloy Ranjan Biswas, "Bangladesh's Participation in UN Peacekeeping Missions and Challenges for Civil-Military Relations: A Case for Concordance Theory", *International Peacekeeping* 21 (3), 2014, p.339.

⁸⁰ Krishnasamy, "Bangladesh and UN Peacekeeping", 2003, p.42.

⁸¹ OECD, "Development Aid at a Glance Statistics by Region: Asia 2017 Edition", Available at: <http://www.oecd.org/dac/stats/documentupload/Asia-Development-Aid-at-a-Glance.pdf>

⁸² Global Humanitarian Assistance, "Bangladesh: Country Briefing", January 2012, Available at: <http://devinit.org/wp-content/uploads/2012/01/Bangladesh-country-briefing.pdf>

within 24 hours. The FD-6 and FD-7 approvals are required to release funds and appoint foreign staff or consultants for project implementation.⁸³

Humanitarian agencies have scaled up their operations in Cox's Bazar since the first arrivals of Rohingya in 2017. Despite the early chaos, all stakeholders interviewed identified ISCG hosted by IOM and UNHCR, as the body responsible for coordinating humanitarian agencies for the response to the Rohingya Exodus. They also recognised that it was a "positive advantage" that the ISCG was in place before the 2017 exodus. Sector agencies leveraged pre-established relationships with counterparts in government to plan for a quick onset disaster long before the central government's approvals for relief programs came through. Despite that, some participants said that it became clear that an IOM-led response lacked the technical expertise for humanitarian coordination offered by United Nations Office for the Coordination of Humanitarian Affairs (UN OCHA) and refugee protection offered by UNHCR needed for a Level 3 emergency. This meant that the internationally mandated agency for humanitarian coordination was not utilised and a negotiated structure was in place, and highlighted the importance of the well-established pre-existing relationship IOM has with the government. This underlines the importance of inter-personal relationships in establishing humanitarian access to populations of concern over-and-above official mandates.

The ISCG structure was modified to meet the demands of the 2017 Rohingya Exodus. The UNHCR's mandate was expanded to cover unregistered Rohingya. The ISCG is now led by a Senior Coordinator who reports to the co-chairs of the Strategic Executive Group (SEG) – the IOM Chief of Mission, the UN Resident Coordinator and UNHCR representative. The Senior Coordinator also chairs the Heads of Sub-Office Group, which brings together all the heads of UN agencies and representatives of INGOs, NGOs and the donor community based in Cox's Bazar. The ISCG Secretariat is supported by the External Relations Unit, Analysis and Planning Unit, Situation Unit and Coordination Unit. The ISCG has 10 sectors, mirroring the national clusters, led by INGOs/UN agencies and government line ministries for service provision. There are eight working groups to support the ISCG, which have a culture of information sharing. Apart from weekly coordination meetings within and between sectors, sector-level plans, meeting minutes, sector progress reports, joint needs assessments and contact details of focal points are accessible through a public online platform. An ISCG situation report collating every sector's needs, response, operational gaps and constraints as well as coordination developments are published bi-weekly. In addition, a '4W' (Who does

⁸³ See People's Republic of Bangladesh Prime Minister's Office, "Circular: Working procedure for foreign and foreign-assisted Bangladeshi non-governmental organisations working in Bangladesh", April 12, 2012, Available at: <http://www.icnl.org/research/library/files/Bangladesh/Bangladeshfinal.pdf>

What, Where, When) is published periodically to map the implementation actors and humanitarian activities in each refugee camp.⁸⁴

There are still reservations with the new structure, however. An INGO Humanitarian Advisor with the UN said that even with the new SEG-led ISCG structure, the humanitarian “operation is a little bit compromised” because of the absence of an OCHA-led coordination approach:

“What coordination structure [is there] in Bangladesh and Cox’s Bazar? ... OCHA was initially here for six months but now the operation has been shut down, handed over to the IOM. OCHA came here [and was] working under the coordination of IOM because the government wanted that.”⁸⁵

“When they had the transition, everything they compromised ... OCHA approach, coordination is not followed here ... [UNHCR], their expertise is on refugees. Now, we are talking about the host communities [too]. Government is saying that the host communities have been deprived, could be clear tension between host communities and refugees.”⁸⁶

Operationally, different humanitarian agencies are expected to coordinate. A representative from the donor community said, “Whether it is the mandated agency or UNHCR or OCHA, at the end of the day, six months on, people accepted this structure and we have the right system”. Based on the Joint Response Plan, the response to the 2017 Rohingya Exodus brings together over 130 humanitarian organisations (13 local, 45 national and 69 INGOs). Most of them work in partnerships with UN agencies and respond based on ISCG’s sector-based coordination. The domination of UN agencies and a handful of INGOs in the ISCG was noted by several participants. A limited number of Bangladeshi organisations work as co-lead coordinators in ISCG sectors. Meanwhile, INGO and NGOs operating at the national level are exploring better ways of coordinating their response in Cox’s Bazar and to complement the ISCG-led efforts. A participant said that the INGO Emergency Subcommittee in Dhaka is planning to decentralise INGO coordination to the district level and form a group called “NGO Platform” to coordinate NGO activities, and feed information

⁸⁴ See ISCG, “Bangladesh: Cox’s Bazar refugee response (4W) – as of 2 March 2018.” Available at: https://www.humanitarianresponse.info/sites/www.humanitarianresponse.info/files/documents/files/201803_02_4w_final.pdf

⁸⁵ Interview with Humanitarian Affairs Specialist at the UN Resident Coordinator’s Office, Dhaka, Bangladesh, 27 February 2018

⁸⁶ Interview with Humanitarian Affairs Specialist at the UN Resident Coordinator’s Office, Dhaka, Bangladesh, 27 February 2018

into and raise issues to the ISCG and district administration.⁸⁷ This would be a significant devolution of duties from ministry headquarters in Dhaka to building district level capacity within the ministry for NGO affairs. It would contrast to the ‘out-posting’ of RRRC whereby the whole agency was relocated to Cox’s Bazar.

4.4 Coordination between different disaster management actors

Several platforms exist to coordinate between state and non-state actors in disaster management during normal and emergency times.⁸⁸ The NGO Coordination Committee on Disaster Management (NGOCC) headed by the Disaster Management Bureau reviews and coordinates disaster management activities with NGOs. The Secretary of MoDMR chairs the Local Consultative Group - Disaster and Emergency Response (LCG-DER), which is a coordination platform that aims to strengthen the collective capacity for humanitarian response and recovery from disasters. The HCTT was established as an advisory group to the LCG-DER to give advice on disaster management action. The HCTT is a platform to coordinate national response to disasters according to nine clusters.⁸⁹ A national government agency and international humanitarian agency are co-leads for each cluster.

A common theme in non-state institutional literature focuses on the quality of humanitarian coordination in Bangladesh. With the large number of disaster management institutions within the Government of Bangladesh, there is lack of clarity on how each of them fit into a single operations system. The SOD demarcates the roles and responsibilities of each institution but it is silent on the relationship between the different entities.⁹⁰ Reports indicate that available forums such as the LCG-DER and the HCTT are utilised for coordination between state, security forces and non-state actors. However, there is confusion among non-state stakeholders about what to expect from government agencies such as the DRR and the Disaster Management Bureau. For instance, the SOD provides that the Disaster Management Bureau is the agency responsible for coordination and technical tasks. DMB’s status as a Bureau, however, means that it has no staff beyond those based in the Dhaka

⁸⁷ Interview with Head of Humanitarian Programmes at Islamic Relief Bangladesh, Baridhara, Dhaka, Bangladesh, 28 February 2018

⁸⁸ Emdad Haque et al, “Disaster Management and Public Policies in Bangladesh: Institutional Partnerships in Cyclone Hazards Mitigation and Response” in Emdad Haque and David Etkin (eds), *Disaster Risk and Vulnerability: Mitigation through Mobilising Communities and Partnerships*, McGill-Queen’s University Press: Kingston, Ontario, 2012, pp. 154-182.

⁸⁹ The clusters are the Food Security Cluster, Health Cluster, WASH cluster, Shelter Cluster, Nutrition Cluster, Logistics Cluster, Education Cluster, Early Recovery Cluster and Protection Cluster.

⁹⁰ UNDP, “Achieving Effective Balance in Coordination: Disaster Risk Reduction Through Preparedness and Response”, November 1, 2011, Available at: http://www.bd.undp.org/content/dam/bangladesh/docs/Publications/24%2011%2011_Humanitarian%20Coordination%20Report_final.pdf

headquarters, and has limited access to resources and authority.⁹¹ Further, as all government ministries are involved with disaster management in some way, line ministries often draw up sectoral recovery plans themselves without horizontal coordination with colleagues from other ministries.⁹²

Coordination and information sharing between non-state actors with the Government of Bangladesh appears to be a constant through existing forums but there are challenges. In a multi-agency environment, there are broad variations in the conduct of disaster management activities on the ground from the collection of data, to needs assessments, the distribution of relief items, and monitoring and evaluation. The significant challenges to inter-NGO coordination are how to harmonize these differences to ensure consistency in coordination at the ground level, and balancing competing pressing and legitimate priorities across different sectors.⁹³ Some commentators note that confronting coordination challenges is made difficult by competition among stakeholders and that in Bangladesh there is a tendency for politicizing humanitarian assistance and disaster relief.⁹⁴

4.5 The role of beneficiaries

In the 2017 Rohingya Exodus response beneficiaries were engaged through the Majhi system. A Majhi is a Rohingya community leader, typically in charge of 10-12 families within a camp. The Majhi system has been used in Rohingya refugee camps since 1991 but was disbanded in 2007. It was replaced by committees including Camp Management Committees, Block Management Committees and Food Management Committees to ensure more democratic representation and equal gender representation.⁹⁵ Participants reported that Majhis help CiCs, the Bangladeshi Army and humanitarian actors who are site managers to disseminate information, facilitate needs assessments, bring new arrivals to registration centres, relief distribution and conduct night patrols. An army official managing an unofficial settlement said:

⁹¹ Ibid, p.17.

⁹² Tony Beck, "Learning Lesson from Disaster Recovery: The Case of Bangladesh", World Bank: Washington, D.C, 2005.

⁹³ Inter-Sector Coordination Group Bangladesh, "2017 Monitoring Report: Rohingya Refugee Crisis Response Plan", December 2017, p.43. Available at: <https://reliefweb.int/sites/reliefweb.int/files/resources/Rohingya%20Refugee%20Crisis%20Response%20Plan%20-%20Monitoring%20Report%2025%20August%20to%2031%20October%202017%20-%20FINAL%20011217.pdf>

⁹⁴ See Emdad Haque et al, "Disaster Management and Public Policies in Bangladesh: Institutional Partnerships in Cyclone Hazards Mitigation and Response", 2012, pp.170-171

⁹⁵ Olivius, E. "(Un)Governable Subjects: The Limits of Refugee Participation in the Promotion of Gender Equality in Humanitarian Aid", *Journal of Refugee Studies* 27 (1), 2014, pp. 42-61

“Most of them, all the families listen to the Majhis. All the problems they are facing, they come to the Majhi.”⁹⁶

He added that beneficiaries collectively nominate individuals to be Majhis before selecting the required number from the shortlist. He added that nominees who are “a bit educated” are given the priority for the leadership position. Complaints from beneficiaries about abuse of power are investigated and if a Majhi is found to have done so, the Majhi would be removed from his position. It is unclear if this selection process and complaints mechanism are standard practices in all camps. The reintroduction of the Majhi system appears to be in response to the mass movement of people; an imperfect system in a crisis. As the movement of people has slowed, there is a need to shift to camp committees to govern with a more democratic and equal gender representation as was developed in the formal refugee camps.

5. Challenges in the Humanitarian Response to the Rohingya Exodus

Bangladesh had hosted the recent arrivals of Rohingya for six months at the time of the fieldwork. Although stakeholders acknowledge that there are still gaps to the emergency response, many indicated that “things are settled down” and that “more or less, coordination is in place”. As the monsoon season begins, Bangladesh’s disaster preparedness and capacity to cope with a complex and protracted crisis will be tested again. In this section, we provide an analysis on the emergency response thus far based on the main themes identified during the interviews. They are (i) operational constraints; (ii) coordination; (iii) accountability; and (iv) localization.

5.1 Operational constraints

The first operational constraint facing humanitarian actors in Bangladesh is the host government policy on refugees. Although borders are kept open, the Government is clear that the displaced Rohingya population should be repatriated to Myanmar and that Bangladesh is unprepared to host the displaced population over the “mid-term or long-term”. During the 2017 Rohingya Exodus, the Government refrained from declaring an emergency or formally requesting international assistance. It has, however, accepted bilateral assistance. Traditional donors in Bangladesh such as the UK’s Department for International Development (DFID), United States Agency for International Development (USAID) and The

⁹⁶ Interview with official of the Bangladesh Armed Forces, Nayapara Camp, Teknaf, Bangladesh on 23 February 2018

Directorate-General for European Civil Protection and Humanitarian Aid Operations⁹⁷ have supported the emergency response mainly through the funding of humanitarian actors. Countries without in-country development agencies like Malaysia, Singapore and Turkey have bilaterally provided relief. There is an awareness among participants that future assistance is not guaranteed without the Government indicating its long-term commitment to host the Rohingya or a formal request for more aid. A representative from the donor community said, “When the Government’s public line is that the Rohingya are not staying here for long, it gives us very little space for sustainable activities.”⁹⁸

The JRP appeal for US\$951 million, if fully met, will secure funding to serve the displaced and host populations until December 2018. But, with no timeline for the repatriation of Rohingya to Myanmar, many humanitarian agencies are unable to commit resources for sustainable interventions beyond the end of 2018 and unable to formulate an exit strategy. A Dhaka-based INGO representative said:

“If you don’t have a good, long-term vision or strategy in place, it is difficult to plan. Each and every day the situation is changing. Sometimes, we hear that the repatriation will start and then we may have to plan for a quick pull out. Then, you see, it may not happen.”⁹⁹

Meanwhile, the Rohingya population is confined to one mega camp and several smaller sites, with restrictions to mobility and access to formal job markets and education, hampering prospects of self-reliance. A second operational constraint highlighted was that the physical environment and conditions in refugee settlements pose serious limitations on disaster preparedness against further shocks such as the monsoon season in April. On that, one INGO representative said, “I am more prepared to die in Yemen than to respond to the monsoon season” and another called it a looming “massacre”.¹⁰⁰ All participants singled out the shortage of suitable land as a key problem and decongestion of settlements as priority for disaster preparedness. Most of the Rohingya refugees are living on forest land and degraded hill slopes in structurally weak shelters that do not meet core humanitarian standards. There are almost no drainage systems in the congested camps and sanitation facilities are regularly built close to water sources, raising the specter of a public health crisis. Allocation of new land by the Government would require extensive development

⁹⁷ Formerly known as the European Community Humanitarian Aid Office (ECHO), it is the European Commission's department for overseas humanitarian aid and for civil protection.

⁹⁸ Interview with representative of the Department for International Development, Baridhara, Dhaka, Bangladesh on 26 February 2018

⁹⁹ Interview with a representative of Save the Children, Gulshan 2, Dhaka, Bangladesh on 27 February 2018

¹⁰⁰ Interview with representative of the ISCG WASH Sector Coordination Unit, Cox’s Bazar, Bangladesh, 25 February 2018

before it is habitable and would likely come at the cost of Bangladesh's depleting forest resources. The JRP stated that more than 200,000 refugees reside in areas that will certainly flood or collapse with the rainy season.¹⁰¹ Structural works being carried out to reinforce hill slopes. The decommissioning of dysfunctional latrines and the construction of drainage systems are underway. There are also plans to relocate those most exposed to natural hazards though many have refused to move because of the concentration of services at present locations. Whatever scarce community spaces are available, such as learning centres, will likely become common shelters during the rainy season. A participant summarized the situation bleakly:

“There are acceptable risks and unacceptable risks. You can only treat the unacceptable risk. The shelters that are constructed, they are acceptable risks. You need to accept the risk. When you accept the risk, there are very few things you can do to change it. You cannot shift the whole community to somewhere else. If you want to minimize the risk, you have to keep it as it is but that is very difficult.”¹⁰²

Participants emphasized a third operational constraint being the scale of impact of a protracted refugee crisis on the host community and the need to support them. The number of Rohingya doubles that of local Bangladeshis in Teknaf and Ukhia. This has led to an inflation in the price of goods and services and the suppression of daily wage rates. The sudden surge in population has put public services such as healthcare under strain and increased competition for local resources such as potable water and fuelwood. As a result, this generates conflict-sensitive interventions by humanitarian agencies and included in the JRP. Some humanitarian agencies have introduced work programs as mentioned earlier that require the equal participation of local and Rohingya workers with an equal wage rate. As the crisis prolongs, however, the overlapping of long-term support for the refugee and host population may not fit conventional donor funding modalities, which differentiate between humanitarian and development assistance. This is an important bridge to cross and develop co-deployment of humanitarian and development actors into the field in an attempt to ensure that the needs of the displaced and local communities are met.

5.2 Coordination

Several procedural and operational gaps were uncovered when operationalising the PMO directive. There is a need for greater preparedness for a complex emergency in Bangladesh. At present there is an absence of policies and processes that would facilitate an

¹⁰¹ “Joint Response Plan for Rohingya Humanitarian Crisis March-December 2018”, p. 13.

¹⁰² Interview with Head of Humanitarian Programmes at Islamic Relief Bangladesh, Baridhara, Dhaka, Bangladesh, 28 February 2018

internationalised emergency response. For instance, one participant reported that there was a lack of clarity on how relief materials coming through the country's airports would be managed. The Bangladesh Armed Forces was tasked to receive and release incoming goods but understood its responsibility as limited to managing goods coming into airports at Chittagong and Cox's Bazar when humanitarian actors expected the military jurisdiction to extend to the airport in Dhaka. A formalised mechanism for constant civil-military coordination appears to be missing on the ground too. Representatives of the military attend coordination and taskforce meetings but participants were quick to point out that it does not have "any regular activities" or "take decisions" at these meetings.¹⁰³ The ISCG sector coordinators communicate with military officials in camps through the ISCG civil-military coordinator. Yet, at the time of writing, the position of civil-military coordinator has been removed from the ISCG focal points list after being vacant for months.

Another gap that was cited as "delaying the process, hindering the operations" was the absence of procedures for processing visa and FD7 applications for international humanitarian staff and organisations intending to respond to a quick onset disaster.¹⁰⁴ In the response to the 2017 Rohingya Exodus, humanitarian actors said FD7 clearances can take anywhere between 72 hours to two months. In some sectors such as the Education and Protection Sectors, the lack of FD7 approvals continue to hold back available funds, hinder the deployment of new actors and the expansion of programs by existing actors. Visa application procedures are particularly cumbersome for surge capacity staff who need to enter Bangladesh urgently. Many enter with a tourist visa that are valid for four weeks. In June 2018, the Prime Minister announced that the government is now proceeding cautiously to issue a special category of visa for relief workers. The government remains suspicious of relief workers, as allegedly many foreign nationals enter Bangladesh under the guise of relief workers, which "may lead to child and women trafficking, sexual abuse, terrorism and many other social problems."¹⁰⁵ Bangladeshi law enforcement officers have also regularly stopped and sometimes arrested international staff who do not have the correct visa or do not carry identification documents.

Effective coordination between different actors in this emergency response is made more challenging with the high turnover rate of humanitarian staff, military officials and government appointees such as the CiCs. Humanitarian agencies mobilised surge capacity,

¹⁰³ Interview with Deputy Secretary at the RRRC, Cox's Bazar, Bangladesh, 22 February 2018

¹⁰⁴ Interview with Humanitarian Affairs Specialist at the UN Resident Coordinator's Office, Dhaka, Bangladesh, 27 February 2018

¹⁰⁵ Dhaka Tribune, 'PM: Govt to issue special visa for relief workers in Rohingya camps,' 12 June 2018. Available at <https://www.dhakatribune.com/bangladesh/foreign-affairs/2018/06/12/pm-govt-to-issue-special-visa-for-relief-workers-in-rohingya-camps/>

drawing technical experts and field support teams to facilitate the coordination and planning for the emergency response in the first six months of the crisis. Surge teams operate on short-term rotations of four to six weeks. An ISCG sector coordinator said that during the interview:

“At the beginning of this crisis, 50 percent of the international staff I used to deal with, a maximum of 10 percent are left. These are the international humanitarian responders ... We are dealing with the seventh health sector coordinator, fifth site-management coordinator ... We can survive with the third round of turnover but after that it is too much ... To coordinate the response, you have to start all over again.”¹⁰⁶

Meanwhile, military officials and CiCs appointed by the Ministry of Public Administration are deployed to the camps on short rotations of two to three months at a time. It is understood that the RRRC has requested the Government for the appointment of CiCs for a longer rotation period of six months but has only been assured that CiCs will serve 3-month stints at a time. This discontinuity is part of the “humanitarian business” and often disrupts trust building between coordinators. It can, however, be addressed with smooth handovers and the localisation of coordination roles.

5.3 Accountability

There is agreement among non-state stakeholders who were interviewed that accountability of service providers to beneficiaries is an issue that requires attention. The operational contradiction between delivering interventions to save lives and to respond to the displaced Rohingya population with respect and dignity were apparent during the crisis. Non-traditional actors such as spontaneous voluntary groups, the private sector or faith-based groups were singled out for this. Participants said it was commonplace at the beginning of the crisis for non-traditional actors such as these to indiscriminately distribute cash or throw relief items off vehicles at beneficiaries along the roadsides.¹⁰⁷ By implication, much of this relief goes to people standing on roadsides regardless of benefit and without the obligations to answer for the effectiveness of the interventions.

However, even within a more controlled or coordinated disaster management environment occupied by experienced humanitarian agencies and implementation partners, it was observed that quality of interventions was compromised to reach a greater number of

¹⁰⁶ Interview with representative of the ISCG WASH Sector Coordination Unit, Cox’s Bazar, Bangladesh, 25 February 2018

¹⁰⁷ Interview with Deputy Secretary at the RRRC, Cox’s Bazar, Bangladesh, 22 February 2018, Interview with a representative of Save the Children, Gulshan 2, Dhaka, Bangladesh on 27 February 2018,

beneficiaries. It was not unusual, for instance, for the ISCG WASH coordination unit to find that hand pumps and latrines were installed incorrectly, in locations which were not accessible to the population in need or did not comply to minimum standards. This was attributed to the overstretched capacity of many actors and the lack of intervention monitoring. Installations that do not meet minimum standards often fall into disrepair, require maintenance or have to be decommissioned, adding on to the responsibilities of other organisations.

A second facet of accountability that was raised during the interviews was that of the coordination mechanisms for humanitarian organisations used in the 2017 Rohingya Exodus. The ISCG Secretariat is the main coordinator of the emergency response but participants pointed out that response coordination and implementation responsibilities are devolved to sector coordinators. The ISCG Secretariat is answerable to the SEG, but is removed from accountability processes that answer to aid beneficiaries. Some are unsettled by the “delusion of accountability” created by how the ISCG is being branded like an organisation of its own. For example, email addresses of the members of ISCG Secretariat do not bear the name of the officer or the organisation he/she is affiliated to. Instead, it has the ISCG domain name. On one hand, this suggests that officers assigned to the ISCG Secretariat do not represent or advance the interests of any single agency but on the other it creates a transparency gap when beneficiaries cannot trace decisions to a specific organisation. The sustainability of the ISCG Secretariat is also in question. Participants highlighted a need to consider a coordination structure that would be able to run without current levels of funding.

5.4 Localisation

The issue of localising disaster management was a key theme in every interview during the study. All participants acknowledge local and national organisations deliver a significant level of assistance in the ongoing humanitarian response. The obvious comparative advantages of Bangladeshi organisations including presence and proximity to a disaster, access to communities in need and knowledge of local disaster contexts, cultures and priorities. However, local NGOs representatives who participated highlighted that their organisations have generally been treated as sub-contractors for INGOs and UN agencies, rather than as equal partners. The involvement of local and national NGOs in strategic decisions such as proposal design and response coordination appear limited.

Local organisations claim they are overlooked for wider coordination roles of the emergency response in UN/INGO-dominant structures like the ISCG. A small pool of UN agencies and INGOs lead both the ISCG sectors and working groups, limiting the space of other

organisations to take on leadership positions in an inter-agency coordination structure. For instance, at the time of writing only the Food Security Cluster has a local organisation as a co-lead coordinator and the WASH sector is the only one with a Bangladeshi national as sector coordinator in the ISCG. The binary in the NGO-UN/INGO partnership is that local organisations are used for programme implementation and are rarely given leadership roles within the wider humanitarian system. A representative of a local NGO summed it up thus:

“We implement the programs as per the agreement. They [the INGO] provide the technical assistance and monitoring.”¹⁰⁸

Opinions gathered from fieldwork on the localisation agenda in Bangladesh have focussed on assessing the capacity of Bangladeshi organisations, either to manage a humanitarian intervention independently or to manage direct funding from donors. On the one hand, representatives of INGOs, the UN and the donor community are of the view that local capacity for program implementation is evident but there is a general need for improving administrative capabilities and accountability mechanisms. They also note that the number of local and national organisations oriented towards humanitarian work is limited. On the other, local organisations have generally argued that their comparative advantage and experience as front liners in disaster settings make them adequate disaster management actors or coordinators. The perception that INGOs have limited knowledge on local context but are better qualified for disaster response comes at the cost of developing local leadership and sustainable interventions.

There is a case to be made for ramping up efforts to localise disaster management practices in Bangladesh. Initiatives like the National Alliance for Humanitarian Actors, Bangladesh (NAHAB) and the Start Fund in Bangladesh are focussed on creating space for local and national NGOs to lead humanitarian interventions.¹⁰⁹ As international aid for the 2017 Rohingya Exodus response tapers or moves out from the emergency response phase, international actors, which have dominated coordination and decision-making structures, have to make strategic decisions about the extent of their own participation in the humanitarian response. Bangladeshi disaster management actors are imperative to a sustainable response. As was seen in the humanitarian response to Super-Typhoon Haiyan in the Philippines, the government instituted reforms that saw local governments take the

¹⁰⁸ Interview with a representative of Mukti Cox’s Bazar, Cox’s Bazar, Bangladesh on 25 February 2018

¹⁰⁹ NAHAB was established to give national and local humanitarian actors a greater say in decision making process in disaster management in Bangladesh. The Start Fund in Bangladesh is a national fund that can be accessed by national and local NGOs to respond to crises in Bangladesh within 72 hours.

lead in disaster response.¹¹⁰ This shift was present two years later when there was a local government-led humanitarian response to Typhoon Hagupit.

There is danger, however, in engaging in a conversation about localisation without evidence-based assessments on how local and international humanitarian actors can complement each other in a particular context. The localisation agenda should not be cast as a one-dimensional referendum on the capacity of Bangladeshi humanitarian organisations. Developing a locally-led disaster management philosophy should not mean local organisations mimicking international ones. Affected communities are best served when the comparative advantages of all actors – local or international – are maximised. For Bangladeshi humanitarian actors, it is important to explore how it can develop and leverage local capacities and harness complementarities with government institutions and other actors. The Red Cross/Red Crescent movement provides a useful example of how local actors can tap onto international support for a locally-led disaster response approach. One donor suggests that this would include local and national organisations differentiating itself by developing a geographical or operational niche, using local knowledge to contribute to policy making, empowering local staff with competitive pay packages, and shedding the overemphasis of securing funding.

6. Implications for Humanitarian Assistance and Disaster Relief

The analysis presented in this report suggests that the well-established disaster management structure in Bangladesh that was successful in managing natural disasters, specifically for floods and cyclones, has been tested in the ongoing humanitarian response to the Rohingya Exodus. While acknowledging that Bangladeshi state institutions, the Bangladesh Armed Forces and the robust civil society have the capacity to mobilise swiftly for an emergency response, there was little in the way of formally articulated policy for responding to the movement of displaced people, let alone preparedness for coordinating an emergency the scale of the Rohingya Exodus. State institutions and INGOs had pre-defined mandates that circumscribed their ability to mobilise an immediate emergency response while those with the freedom to mount a response were overwhelmed by the scale of the emergency. It required a directive from Dhaka before disaster management actors (state and non-state) could fully mobilise an emergency response. This report identifies implications arising out of Bangladesh's response to the 2017 Rohingya Exodus.

¹¹⁰ Julius Trajano, 'Building Resilience from Within: Enhancing Humanitarian Civil-Military Coordination in Post-Haiyan Philippines', NTS Report No. 6, December 2016.

Firstly, there is scope for deliberation on how Bangladesh's existing disaster management structure may be applicable outside of the familiar context of responding to hazards like floods and cyclones by the government and the humanitarian community. Bangladesh is exposed to a diverse range of hazards; response to each is shaped by different dynamics of the crisis and how it affects the population in need. For example, the humanitarian response is influenced by government policy on unregistered refugees, the physical limitations of the two upazilas hosting the displaced population, the damage to the natural environment and the impact on host communities. There is need to analyse how existing disaster management structures and the role of disaster management actors with appropriate skills in Bangladesh can be sufficiently flexible to accommodate a wide range of crisis contexts. It is therefore important to improve community-based disaster preparedness by leveraging trained local volunteers and to expand the Cyclone Preparedness Program to support and train Rohingya and more host communities.

Secondly, the analysis suggests that Bangladesh's disaster management regulatory framework and institutional structure overemphasise the role of government institutions, national and local, for disaster response. This is adequate for situations where domestic disasters are only coordinated among domestic actors. The 2017 Rohingya Exodus reveals that existing policies are inadequate for the management of an internationalised response effort. Bangladesh has initially received a great deal of support from the international community, either through the funding of humanitarian organisations or bilateral relief. The effective coordination of a large volume of aid and diverse humanitarian actors hinge on government processes that facilitate the entrance and exit of humanitarian actors and relief goods. As such, there is room for Bangladesh to consider how it can better streamline strategic policy decisions with day-to-day disaster response operations. For example, the decision to deploy the military to a disaster must be supported by an operational civil-military coordination structure and the decision to accept international aid must be supported by processes for receiving and releasing incoming relief materials. It is therefore important to streamline and revise the approval processes for incoming relief goods, funds, and personnel drawing on regional experiences like those in the Philippines.

The development of such policies would be supported by active engagement in multilateral forums for disaster management such as the Regional Consultative Group on Humanitarian Civil-Military Coordination and disaster management exercises like DREE to bring together military, civilian, NGOs and the Red Crescent/Red Cross communities to explore best practices for disaster management. It is also important to assess alternative national entry points to Dhaka for foreign relief materials, and to develop a faster and more efficient approval process for INGOs that augment local capacity rather than reduce it. There is a

solid base of knowledge already in place from Bangladeshi contributions to UN Peacekeeping Operations to other civilian and military responders. It is important that formalised knowledge transfer is institutionalised to build capacity and awareness of best practices that are applicable in complex humanitarian emergencies.

Thirdly, humanitarian action and disaster relief is dynamic, complex, and highly dependent on individual discretion. There must be opportunity for the population in need, humanitarian actors and the government to hold each other to account to ensure that humanitarian action adds value and does no harm to the beneficiaries. Given these dynamics, it is important to build stronger linkages between the RRRC and local governments to mitigate challenges between displaced and host communities. Furthermore, it would be worthwhile producing templates for contingency planning drawing on global expertise, particularly for monsoons, landslides and earthquakes. It is also advisable to reassess the Cox's Bazar development plan, integrate disaster management as part of long-term development, and draw on the availability of human capital, which can be a catalyst for the long-term growth of Teknaf and Ukhia

Lastly, developing a 'locally-led' disaster management philosophy is a priority of the humanitarian community in Bangladesh. In actualising the 'localisation' agenda, humanitarian actors must know how local, national and international capacities complement each other and how complementarities can be leveraged to achieve more effective humanitarian action. It is important to introduce and finance structured knowledge-transfer and capacity-building programs between international and Bangladeshi humanitarian organisations, including seconding an INGO staff member to Bangladeshi partners to support this effort. This extends to greater democratic and equal gender representation in camp governance for the Rohingya themselves. It is therefore important to re-establish camp committees to govern the Rohingya refugee camps to provide this. Bangladesh has strong local capacity for managing disasters, evidenced by the active role state institutions take and the capacity of civil society.

However, there is room to consider how the thinking on localisation can be reframed as independent of and not relative to the capacity of international actors. For instance, the participation of grassroots organisations, community volunteers and non-traditional actors like the private sector and faith-based organisations should be considered in the conversation on developing a locally led humanitarian response. This would be supported by mapping local community organisations to enhance localization with international organisations and through the identification of capacity gaps and complementarities among local and national disaster management organisations with international actors through

research. It is also worthwhile to institute a formal and accessible feedback system for beneficiaries to providers, and a peer-to-peer feedback mechanism between humanitarian organisations to ensure that the locally led system is responsive to community needs. This can be supported through the integration of humanitarian standards and accountability mechanisms into different stages of the funding cycle, from proposal writing to final reporting. These include periodic monitoring and evaluation of implementation partners, documented donor visits, and peer monitoring between humanitarian organisations.

These efforts can contribute to increasing disaster preparedness among local and national organisations by building organisational policies and processes that would facilitate disaster response coordination responsibilities. In particular, it is important for the national government to work with local government to increase knowledge of the Standing Orders on Disaster and other disaster management policies and guidelines, and to prepare their own contingency plans through a formalized training program. Through a concerted strategic effort to improve disaster management for complex humanitarian emergencies, Bangladesh is well-placed to become a global leader in this field.