Minority exclusion in Somalia: shortcomings of aid agency feedback mechanisms

Claire Thomas and Mohamed Eno

minority rights group international

D.Y.D.O

MCAN
MARGINALIZED COMMUNITIES ADVOCACY NETWORK

NIDIMO RELIEF AND DEVELOPMENT ORGANIZATION
MRDO

P M W D

Cover Image: A refugee camp in Baidoa, Somalia. May 2019.
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Minority Rights Group International

Minority Rights Group International (MRG) is a non-governmental organization (NGO) working to secure the rights of ethnic, religious and linguistic minorities and indigenous peoples worldwide, and to promote cooperation and understanding between communities. Our activities are focused on international advocacy, training, publishing and outreach. We are guided by the needs expressed by our worldwide partner network of organizations, which represent minority and indigenous peoples.

MRG works with over 150 organizations in nearly 50 countries. Our governing Council, which meets twice a year, has members from 10 different countries. MRG has consultative status with the United Nations Economic and Social Council (ECOSOC), and observer status with the African Commission on Human and Peoples' Rights (ACHPR). MRG is registered as a charity and a company limited by guarantee under English law: registered charity no. 282305, limited company no. 1544957.

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Daami Youth Development Organisation (DYDO)

DYDO is primarily based in Hargeisa, Somaliland, and is a non-political, non-profit making, human rights, aid and development-oriented organization, legally registered in 2007 by individuals from Somaliland's minority communities dedicated to improving the degraded conditions and rights of the underprivileged minority groups in Somaliland. DYDO seeks to help minority communities create sustainable solutions to the problems they face, and progress away from absolute poverty, exclusion, marginalization, and unemployment. It is a minority-led organization that advocates for equality and inclusion of minorities in the mainstream social, political, and educational systems of the country.

Marginalised/Minority Community Advocacy Network (MCAN)

MCAN promotes, advocates for and fosters social, economic and political transformations among marginalized and minority communities in Somalia. Their key thematic areas include empowering women and Internally Displaced Persons, agricultural and food security, formal and informal education, livelihood building resilience, child protection, and the protection and mainstreaming of human rights. MCAN is a minority-led organization.

MIDNIMO Relief and Development Organisation (MRDO)

MRDO is a minority-led organization that aims to promote the education, health, child protection, and development of minority groups in Somalia. The organization was founded in order to advocate for the inclusion of health, education, and sanitation services as well as human rights approaches in development programmes.

Puntland Minority Women Development Organization (PMWDO)

PMWDO is a minority-led organization working to improve the social welfare and build the capacity of marginalized minority women and children. They provide primary education, healthcare and training in environmental management and income generation, to achieve sustainable development.

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'We have been complaining to WFP [the World Food Programme] but we have not received any response.… If you send a message, you will not receive a reply. The question is: to whom do we convey and tell our real needs?'
Bantu woman, IDP camp resident in Hiraan province

'I went to the agency that gave [the card] to me, the door was closed and I sat down. I saw people like them [i.e., majority clan members] complaining. They were welcomed and the door was opened. My problem was that I came from a minority group and that was the cause of the other problems I faced.'
Male IDP camp resident, Jowhar

'Ignorance or inability to [make a complaint] compels me to keep quiet about everything that happens to me. Be patient and keep quiet because there is no place for me to go.… That is a question worth asking; the answer is that we do not know where to file a complaint.'
Community leader, man, Jowhar

'Where do we go from where we are now, without going to the media and talking about the problems and not saying that the NGO can only do it by sending our grievances to the world like the UN because they are helpers …'
Male community leader, Jowhar

Contents

Table of Abbreviations

CCM	Camp Coordination Mechanism
CCCM	Camp Coordination and Camp Management
CCORD	Centre for Consultancy, Research and Development
CEA	Community Engagement and Accountability
CFM	Camp/Complaint Feedback Mechanism
DYDO	Daami Youth Development Organisation
FGD	focus group discussion
GBV	gender-based violence
IDP	internally displaced persons
MCAN	Marginalised/Minority Community Advocacy Network
MRDO	MIDNIMO Relief and Development Organisation
NGO	non-governmental organization
PMWDO	Puntland Minority Women Development Organisiation
SDC	Swiss Agency for Development and Cooperation
SHF	Somalia Humanitarian Fund
WFP	World Food Programme
UNFPA	UN Population Fund
UN OCHA	UN Office for the Coordination of Humanitarian Affairs

Executive summary

Most aid agencies operating in Somalia have established complaints and feedback mechanisms (CFMs) in an effort to address longstanding concerns about the effectiveness of their efforts. However, Somali minority communities are less likely to be aware of the existence of these CFMs, and less likely to have registered a complaint using them. These were the findings of an initial study conducted in 2021 by MRG and partners of Swiss funded programmes.[1]

This new follow up study confirms that CFM phone lines are not reliably answered, raising critical questions about the quality of CFMs and whether they are indeed fit for purpose. Of great concern the study found that women reported personal knowledge of threats or reprisals occurring after complaints were attempted or made with 25 per cent of women reporting personal knowledge of this happening.

In addition, there were instances where complaints were made to seek the support of aid providers, or where challenges made to decisions to exclude minorities were found not to be appropriately escalated within organizations. Where there was a response, these were handled in questionable ways. The localised politicisation of aid, with local authority oversight and decision making about who was to be included on beneficiary lists, resulted in minority exclusion, which was neither challenged nor rectified,[2] even after complaints were made to aid organizations.

This study was designed to offer recommendations for ways to ensure that minority groups are better aware of existing CFMs – even where they are not on target lists for services or support. The recommendations are also designed to encourage a greater level of trust and confidence by minority groups to use CFMs. This study is based on data obtained from 34 focus group discussions (FGDs), involving 374 participants (198 women) from Bantu, Eyle, Gabooye, Tumaal and Yibir minority communities. This was complemented by a process of tracking or accompaniment of a number of complaints as test cases.

Confirming the results of the 2021 Minority Inclusion Learning Review, the FGDs revealed that around half of those in minority communities were either entirely unaware of feedback mechanisms or did not know how they can be accessed:

- Many of those who were aware of mechanisms believed that they allowed those in receipt of a service to provide feedback, and thus did not offer anything to anyone who was excluded from receiving such services.
- Others who were aware of mechanisms and how to use them reported phone calls not being answered or feedback not being acted on.
- Some reported discrimination in not giving individuals from minority communities equal access to in-person feedback mechanisms.
- Significant numbers of both men and women reported personal knowledge of threats or reprisals following someone having made or suggested making a complaint.

Agencies operating in Somalia are aware that they cannot satisfy every request or complaint that comes in through a feedback mechanism; the need for support outstrips available resources and some who complain may genuinely not meet beneficiary selection criteria that have been established aiming to channel support to the most vulnerable. However, all those who wish to raise a complaint should be able to do so freely and without (the threat of) reprisals. They should also expect to receive a response (with most agencies using Standard Operating Procedures to do so within 14 days). It should be noted that there appears to be a wider question about the effectiveness of CFMs with the 2021 Joint Multi Cluster Needs Assessment (JMCNA) finding that only 16 per cent of people surveyed knew how to make a complaint – this number was down from 2020 when more than 50 per cent were aware.

Information is a human right. Everyone in a geographical area of operation is entitled to equal access to information about an intervention – including proposed activities and who is eligible and how to raise questions. This equity in information will empower communities on the margins of power to ask aid providers questions about inclusion. This information flow should be budgeted for and built into all proposals.

The following four areas are recommended for improvement, each with a series of concrete steps outlined further below:

(a) **Make existing feedback mechanisms responsive and close the feedback loop** by ensuring that all complaint mechanisms are well supported and properly engaging with all members of all communities.

(b) **Broaden the scope of feedback**, ensuring that all those involved in designing and implementing CFMs convey the message that mechanisms can be used to submit feedback about non-receipt of services, and are not intended to be used solely by beneficiaries actually reached by that provider.
(c) **Invest efforts into outreach and education about feedback mechanisms** so that all community members, and not just recipients of assistance, are aware of them and feel able to use them. Ensure that local authorities are aware of and engage with feedback mechanisms appropriately.
(d) **Hold community engagement sessions** to articulate the aims, process and benefits of the active complaints feedback mechanism which exists within a community. Build trust that their feedback will be handled honestly and fairly, and foster among all community members a belief in their right to use them.

Concrete steps that could be taken to achieve this are:

Ensure existing feedback mechanisms function effectively, are responsive and close the feedback loop:

- Carry out regular mid-scale 'mystery shopper'[3] type exercises to check the functionality of existing mechanisms; these should be run by independent or arm's-length organizations. Publish the results bi-yearly for transparency to donors, beneficiaries and peers.
- Demonstrate timely adjustments and improvements to mechanisms by all agencies and bodies running CFMs in the light of the feedback from such exercises.
- Ensure diversity of staffing in terms of both gender and minority/majority clan status.
- Arrange for an independent investigation team to look into all allegations of racism, reprisals or failure to engage with those who wish to provide feedback. (This could potentially be a joint initiative of several agencies or bodies.)
- Hold quarterly complaints feedback engagement sessions with the community to understand how the system can evolve and become more accessible to all members of the community, ensuring the participation of women or holding women-only discussions in addition.
- Offer multiple avenues for complaints and feedback to communities, including verbally, by radio, phone and via minority rights organizations, women-led organizations and platforms sensitive to gender-based violence (GBV). This is essential to offer to those threatened with reprisals so they will still report problems. Reports of threatened reprisals should be prioritized by organizations for response within 48 hours.
- Ensure that all proposals and current projects have adequately budgeted for CFMs to reach the most marginalised and vulnerable populations - with clear markers for intersectionality (where a minority clan member is a pregnant female, elderly person without a carer, or has a disability, the CFM needs to reach them first in their preferred way). This budget needs to be clearly outlined and justified to the donor. This budget should include ensuring free and equal access to all information about an intervention to all community members (both beneficiaries and non-beneficiaries).

Broaden the scope of feedback so it goes beyond feedback on one particular service that beneficiaries alone use:

- Ensure that publicity for feedback mechanisms makes abundantly clear that they are intended for those who are excluded from a service but have feedback about it or their exclusion, as well as those who are receiving it.
- Find ways to share information and ensure complaints do reach the responsible party. It is not reasonable to expect those on the ground (especially those who are not receiving a service) to know which mechanism would be appropriate to use to make a complaint.
- Arrange for consortia or independent organizations to run feedback mechanisms not linked to any service provider at province level (building on the PMWDO model of doing so, outlined on page 18). This could either replace or complement feedback mechanisms run by service providers for their users. To ensure minorities are reached, there is a strong case for having such mechanisms run by verified minority-led organizations, or in consortia in which minority- and women-run organizations have significant involvement and authority.
- The process of tracking and accompaniment of complaints piloted during this research, which was primarily intended to allow understanding of specific mechanisms to emerge and be documented, also resulted in the reversal of decisions that excluded minorities on a number of occasions and active efforts to include minorities in others. These efforts are useful but have no funding and most minority-led non-governmental organizations (NGOs) are not eligible for assistance from the Somalia Humanitarian Fund (SHF) (which is what PMWDO used to run their hotline and follow up on complaints). Thus, UNSOM should expedite a new SHF eligibility round and ensure minority-led organizations are considered within that process. The SHF could encourage applications to enable much-needed work to run independent

hotlines, as well as accompany and follow up on complaints that have merit and which show evidence of likely aid diversion. This in turn could help identify and address biases in aid distribution and accountability, which stem from and often replicate Somalia/Somaliland's[4] unequal social structures.

Put efforts into outreach and education about feedback mechanisms

- Use posters, radio spots, ringtone messages and (inclusive) community meetings as the most effective way to let minority community members know about feedback mechanisms. Sole reliance on the reverse of SCOPE[5] or cash-for-food cards is not recommended as it implies that feedback is only welcome from those in receipt of support.
- Engage communities on the design, purpose and use of mechanisms: Once a CFM (or multiple CFMs) are established to reach the most marginalised communities, aid actors need to conduct 'conversations with communities' using multiple channels, so that women, men and children are aware of their right to freely ask and have answered their questions or concerns - without reprisal and indeed with trust that their efforts will at least be responded to. This engagement can be through face-to-face engagement leveraging minority networks, or through media channels or technological solutions.
- Outreach should be translated into or be inclusive of at least the Maay dialect of Somali, and ideally incorporate text or speech in Bajuni, Bravanese/Chimbalazi, Eyle and Mushunguli (Eyle may be useful only orally in radio spots). Inclusion of these languages in text, or using terms from them orally, signals openness to receiving feedback from speakers of these languages; it may not be necessary to translate the entire text on a poster to reach out to communities, many of whom may also understand Somali.
- Publicize positive stories of how feedback has led to positive change for communities (when it works well) to counteract the long-standing mistrust in feedback. This should be done once agencies are confident that any problems with the functioning, responsiveness and fairness of existing mechanisms have been sustainably resolved.

1 Introduction

In 2021, in partnership with local minority-led partner organizations in Somalia and the Centre for Consultancy, Research and Development (CCORD), a specialist research agency, MRG completed a Minority Inclusion Learning Review of Swiss-funded programmes in Somalia. In fact, the review covered a significant part of international aid and development programmes in Somalia (many of them funded in part with contributions from the Swiss Ministry of Foreign Affairs). The research involved a survey of 1,991 respondents in Somalia/Somaliland who were pre-identified as belonging to one of three groups: minority communities, IDP (internally displaced persons) camp populations (mixed ethnicities) and host communities (primarily majority communities). One of the findings of that study was that members of minority communities in Somalia were less likely to be aware of, and less likely to have made use of, feedback mechanisms operated by agencies providing services or interventions in Somalia. The relevant extract from that report is reproduced as Annex I on pages 22 and 23.

This presents agencies operating in Somalia with a conundrum: security concerns mean that it is not always possible to directly verify who is and is not being reached by and benefiting from services. Mechanisms by which such communities can provide feedback directly via a phone line or a similar platform should remedy this. But those not being reached are those who seem the least likely to be aware of the existence of such mechanisms or be confident in how to use them and have sufficient trust to be motivated to do so. The current study attempts to delve in more detail into minority communities' knowledge and understanding of feedback mechanisms, willingness and experiences of using them and expectations relating to them. The study is based on data from two main sources: 34 FGDs, involving 374 participants (198 of them women), which were held from Burao, north of Hargeisa in Somaliland, to Kismayo in the southern part of Somalia. The minority communities represented at these meetings included Bantu (Jareer), Eyle (Jareer), Gabooye, Tumaal and Yibir. Almost all those involved (97 per cent) were in IDP camps at the time, meaning that they were a population to whom feedback mechanisms are relevant.

The second methodology adopted by the research team was intended to be a contemporaneous light form of process tracing, whereby the team would trace back decisions that resulted in minority exclusion in some detail as well as accompanying minority individuals who were using feedback mechanisms and tracing the ways in which that generated responses and results (or not). The research, which began in November and December 2021 and carried on in the early months of 2022, fell at a time when multiple rains had failed in Somalia and a significant drought was ongoing. This resulted in a spike in both the needs of all households in Somalia for income and nutritional support but also a spike in displacement. While the methodology had originally been planned to passively follow and document processes without any intervention to remedy instances of exclusion by our team members, the severity of the circumstances meant that the team felt unable to do so, and instead actively intervened in cases where minorities in need of aid were not receiving it. This always followed after individuals within communities had tried to rectify problems but had failed. In some cases, the teams were able to rectify decisions or processes that were resulting in exclusion, albeit with significant delays. It was very clear that problems were resolved as a result of our intervention and relied on resources (such as advocacy, connections and visibility) that we were able to deploy and, at least in all the cases reported in the next section, from page 15, would likely not have had the same outcome without our intervention. The research team were able to combine those who had built up a relationship of trust with communities over years, those with information about how processes should work, and those who had the international connections to ensure access to and to bring pressure to bear on decision makers (particularly those within international agencies). The complaint accompaniment methodology had one limitation which concerned the reported threats of reprisals against those who complained. This meant that our methodology of accompaniment of complaints brought by individuals entailed risks for those individuals, particularly if and when we publicized the outcome – or lack of it. These additional risks could have resulted in harm, and we felt that this was not justified. The instances of accompaniment set out in this report are both limited in number and have details edited out to avoid doing harm.

2 Focus group discussion findings on feedback mechanisms

This study reached out to minority community members and asked them about their perceptions and experiences of using feedback mechanisms.

Awareness of feedback mechanisms

Overall, 36 per cent of participants (34 per cent of men and 38 per cent of women)[6] stated during the conversation that they were unaware of mechanisms to give feedback concerning services in their area. (Although this question was intended to capture awareness of the mechanisms per se, it was hard to separate this knowledge from an understanding of how, when and why to use them.)

This compares to figures about community members who have made a complaint between January and June 2022 (31,600 complaints raised in total of which 74 per cent were made by women. In contrast with our findings in this section, according to the Camp Coordination and Camp Management (CCCM) Somalia, 99 per cent of complainants were satisfied with the response, with the average time given to receive the response being three days. Twenty-five per cent of all complaints were received via phone lines. The data was supplied by 36 partners operating in 17 districts who are taking part in the CCCM Cluster joint Camp Feedback Mechanism (CFM) initiative.[7] It seems unlikely to be the case that the difference between our FGD responses and the CCCM Cluster reports are solely due to the minority status of our respondents; far more likely is that the difference results from the difference in data collection methods, or a combination of the two.

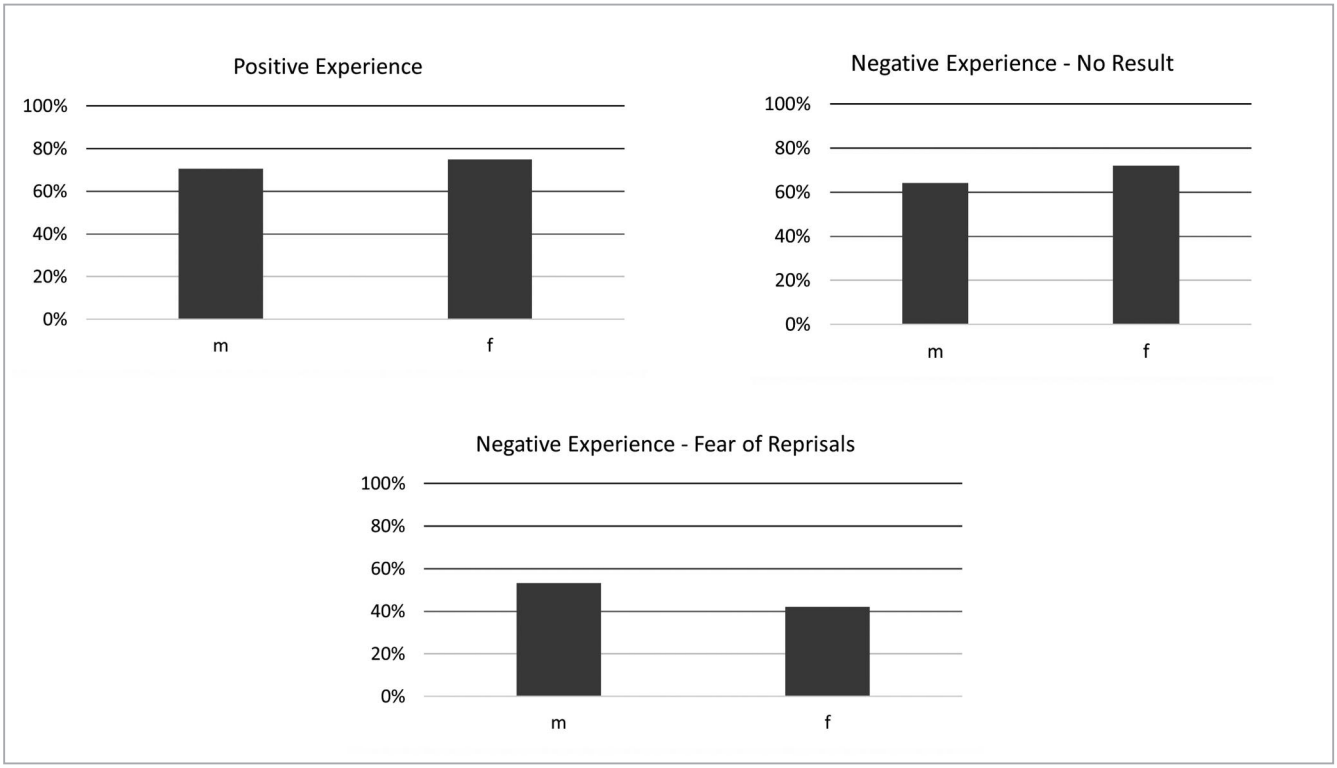
In fact, slightly over half (52 per cent of men and 50.5 per cent of women) of those in the FGDs had ever used a mechanism. Their experience of doing so was mixe (see Fig. 1): while overall 73 per cent[8] had had at least one positive response,[9] 68 per cent had made a complaint which resulted in no change. Of most concern were the 47 per cent who stated that they had experienced reprisals or other negative outcomes after using a feedback mechanism, a response reported more widely by men (53 per cent) than women (42 per cent). There was no discernible concentration of those reporting reprisals or negative outcomes in any one region or among any one community, The most common reprisal mentioned was withdrawal of aid or services from those who had complained (although it should be borne in mind that these were group discussions in which sensitive topics were less likely to be mentioned).

> *'I don't have any knowledge about how to provide feedback.'*
> IDP camp male resident, Garowe, Puntland
>
> *'There is no complaint office we know.'*
> Yibir man, IDP camp, Galkayo, Puntland
>
> *'We do not know how to make complaints.'*
> Eyle community leader, IDP camp, Mogadishu
>
> *'Ignorance or inability to [make a complaint] compels me to keep quiet about everything that happens to me. Be patient and keep quiet because there is no place for me to go.… That is a question worth asking; the answer is that we do not know where to file a complaint.'*
> Community leader, man, Jowhar

The kind of methods or mechanisms that participants mentioned they were aware of included phone-based feedback (40 per cent), speaking to someone (27 per cent) and filling a paper form (19 per cent). All were evenly spread across regions.

While, as stated above, feedback mechanisms cannot guarantee any tangible results, given that current needs far outstrip the resources available, when participants reported not receiving results, the conversations did not focus (as might be expected) on a final decision or closed feedback loop. Instead, it seemed that in many cases, participants did not get past the first hurdle. This varied from calling numbers and not being able to get through, being prevented from accessing an office to speak to a staff member, and complaining but getting no response at all, as the following quotes show.

Figure 1: FGD Participants' experience of complaints actually raised



'Some NGOs don't want to meet you in order to hear your complaint.'
Gabooye woman, IDP resident, Bosaso, Puntland

'The watchman doesn't allow you to get in the office in order to share your complaint at the NGO.'
Gabooye IDP camp resident, man, Bosaso

'We have been complaining to WFP but we have not received any response. We now have cards issued to us by WFP for three years with a number on the back. If you send a message you will not receive a reply. The question is to who do we convey and tell our real needs?'
Bantu woman, IDP camp resident in Hiraan province

'Every time you call the complaint number it says the number you called is busy or off.'
Female IDP camp resident, Hiraan province

'In the name of Allah, we have called the complaint number 2181 to give feedback, they have not listened to our complaint, we are looking for various agencies that will listen to our needs and listen to our reports and look at the facts of the state we are in.'
Community leader, man, Jowhar

'These people have been discriminated against and denied their rights, we are seeing complaint numbers and we are always calling for no answers, we are looking for a way to get a response to our complaints and we want people to be treated as equal and not called minorities.'
Community leader, man, Jowhar

'If we send a letter of complaint, we will not receive a good response or action.'
Community leader, man, Jowhar

'Camp life is very difficult, there are no comments or feedback. We always complain and do not get a response to our complaints. There is racism.'
IDP camp resident, woman, Jowhar

'If we call the complaint numbers, we have nothing to gain.'
IDP camp resident, man, Hiraan

'We believe that no one is listening to our complaint at all and we don't know where we can share a complaint, whether it is the government or humanitarian agencies from whom we could get a response.'
Gabooye community leader, Burao

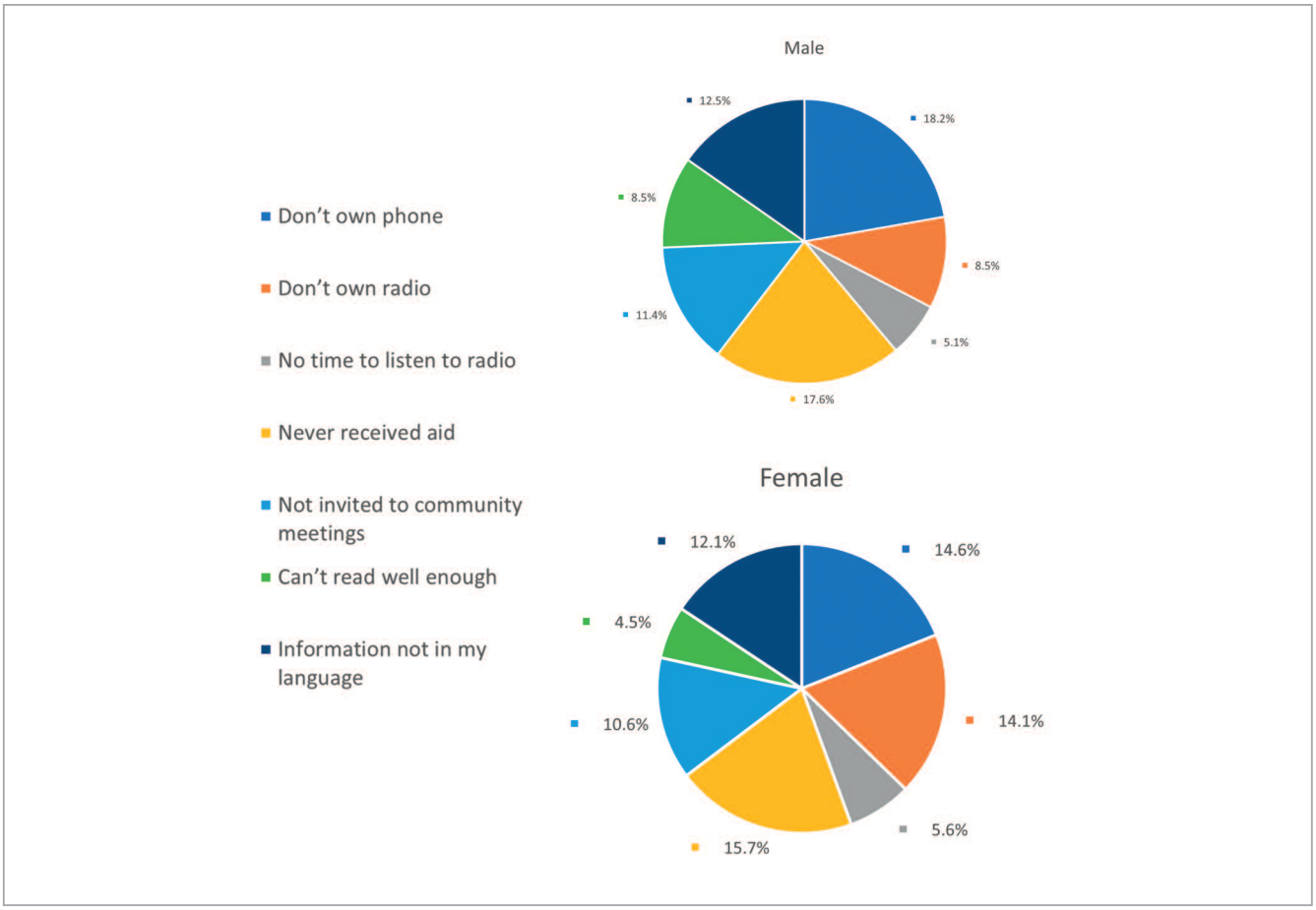
Quality of response experienced

The team was so concerned about the reports regarding unanswered calls to feedback hotlines that we arranged to video individuals making calls to some numbers on multiple occasions to provide evidence of this fundamental problem. Selected clips of IDP camp residents calling a variety of helplines are available here. Calls were either not answered, or callers were invited to leave a message. No one got back to any person who left a message within 3 weeks. This is not a problem experienced exclusively by minorities, of course, as everyone is potentially affected: but it does impact minorities particularly, because of the increased likelihood of their being sidelined in aid distribution,[10] meaning that they are more reliant on such remedial steps, and face extremely difficult situations when those mechanisms also fail to work as advertised.

When asked why they thought they had not become aware of how to make a complaint or raise a concern (see Fig. 2), men tended to cite not owning a phone (18.2 per cent), not receiving aid[11] (17.6 per cent), information not being in their language (13 per cent) and not being invited to community meetings (11 per cent). Other reasons, such as not owning a radio (9 per cent), not being literate (9 per cent) or having no time to listen to the radio (5 per cent) were cited less often.

Minority women who were not aware of mechanisms were more likely to mention not receiving aid (16 per cent) as a reason, followed by not owning a phone (15 per cent), but for women these were very closely followed by not owning a radio (14 per cent), not being invited to community meetings (13 per cent) and information not being in their language (12 per cent). We also saw significant regional differences: 75 per cent of those reporting not owning a phone came from Hiraan or Mogadishu/Baidoa/ Kismayo, although these areas supplied only 39 per cent of all participants and 95 per cent of those reporting not owning a radio also came from these regions. Of those reporting being unaware as they had never received aid or a service, 76 per cent came from Somaliland and Mogadishu/Baidoa/ Kismayo (compared to 52 per cent of all participants). Similarly, 91 per cent of those reporting that information was not in language that they understood were from Somaliland and Mogadishu/Baidoa/Kismayo. For the latter, this may be linked to the fact that participants came

Figure 2: Reasons given in the FDGs for being unaware of feedback mechanisms



primarily from the Eyle hunter-gatherer Bantu community who are known to speak a separate language as well as the Mushunguli speaking (wasigua) communities in Kismayo. This finding is more surprising in Somaliland where it is commonly assumed that a relatively homogenous linguistic landscape exists, with Northern Standard Somali dominant. In fact, anthropological records do record linguistic differences. For example, the Yibir community is recorded as having a language but, as this has been considered secret and used only by community members, the community must speak in Somali when interacting with outsiders.[12]

Minority group preferred CFM channels

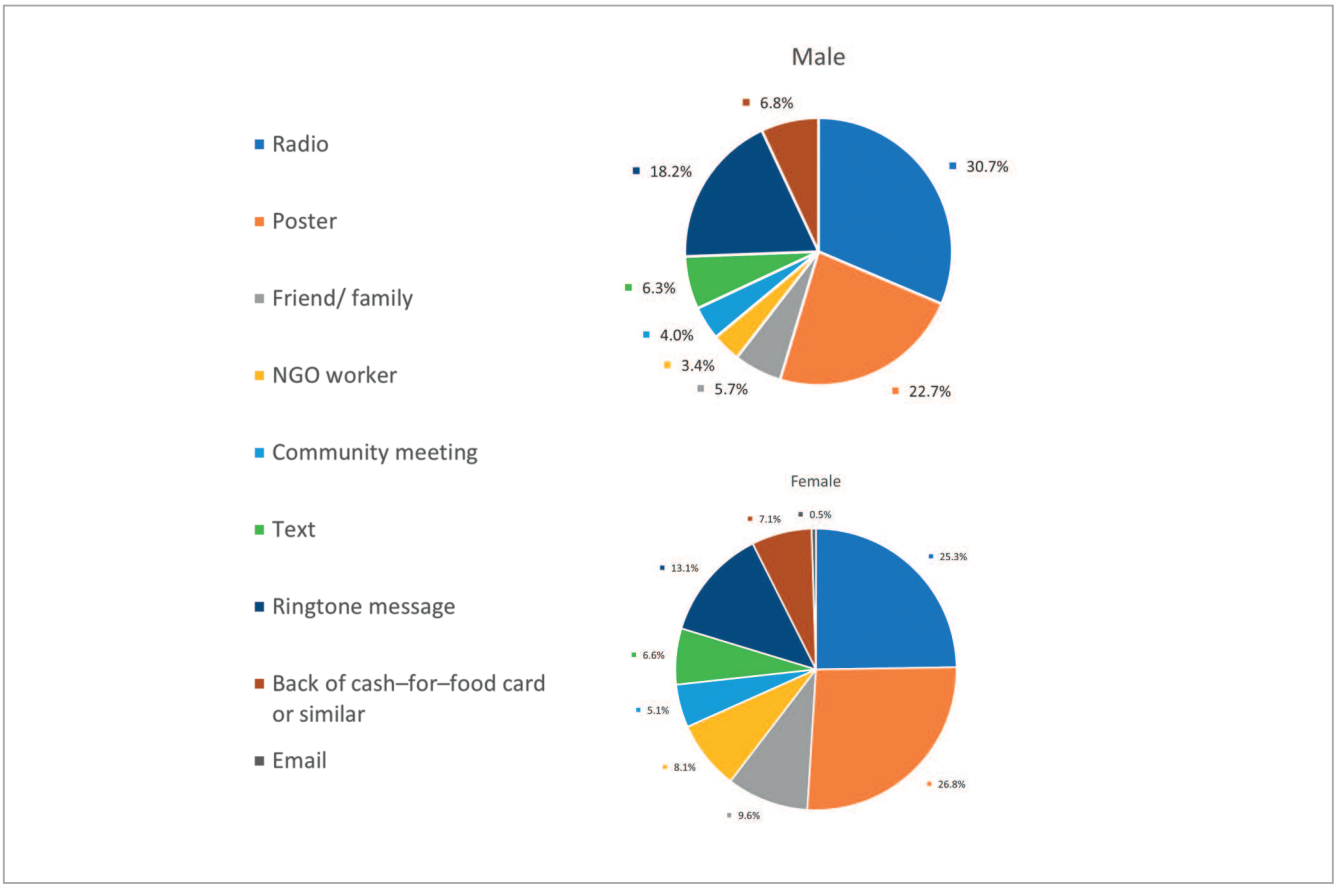
Of those who were aware, men were most likely to have become aware of a feedback mechanism through radios, posters and ringtone messages in that order (31 per cent, 23 per cent and 18 per cent respectively) with a big drop to the next response at 7 per cent (back of cash-for-food card). Women were most likely to have become aware via the posters, followed by radio and then also ringtone messages (27 per cent, 25 per cent and 13 per cent), but in their case two other sources of information were not far behind: friends and family, and NGO workers (10 per cent and 8 per cent). The reports of hearing about feedback mechanisms via posters and radio were evenly geographically spread, but the reports about hearing of them from ringtone messages were over-represented in Somaliland (52 per cent of all comments despite being only 29 per cent of all participants), followed by Baidoa/Kismayo/Mogadishu, with no participants in the Hiraan region mentioning this as a way that they became informed about feedback mechanisms. Overall, surprisingly few participants mentioned being aware via information listed on the reverse of a cash-for-food card or similar (7 per cent of both men and women), despite this being a significant method for major providers to make people aware of such mechanisms (e.g., World Food Programme, WFP, see Fig. 3). It may be suggested that those we surveyed were generally not in possession of one of these cards (which may well be the case), but nonetheless we would expect that, in many settings, community members would be aware of the existence and usage of such cards (including therefore, potentially, an awareness of the messaging on the reverse side). People who reported gaining knowledge this way were heavily concentrated in Puntland (77 per cent of those mentioning it, although only 32 per cent of all participants.)

Figure 3: Back of WFP SCOPE cash-for-food card

When asked what method they would prefer to use if they were to provide feedback, both men and women would prefer to provide feedback by phone (men 31 per cent and women 24 per cent), followed by text (men 22 per cent, women 23 per cent). Preference for making a complaint in person was lower overall and with minority men having a slight preference for speaking to a non-local person (6.8 per cent), compared to a local person (6.3 per cent) and minority women having a much clearer opposing preference for passing feedback via a local person (whom they would probably know) at 11 per cent compared to a non-local person (6 per cent). Another significant difference between men and women was that women preferred to make a complaint or provide feedback indirectly, via an elder from their community, rather than doing it themselves (14 per cent compared to 6 per cent for men). Men were more likely to say that they would raise issues during a meeting (men 13 per cent and women 8 per cent). The option of using a minority NGO was not particularly popular with either group, but men were more positive about it than women (6 per cent men and 2 per cent women); minority NGO mentions were recorded in FGDs in Somaliland and Hiraan.

When discussing what would be the best way to inform people like them about the existence and use of feedback mechanisms, the conversations broadly mirrored how people who were aware had actually found out, with one exception (see Fig. 4). Again, men suggested radio and posters and ringtone messages (32 per cent, 25 per cent, 15 per cent), and women suggested posters and radio (26 per cent and 25 per cent), with ringtone messages, and friends and family, also

Figure 4: How participants in the FDGs became aware of the feedback mechanism



mentioned (12 per cent and 10 per cent). The one exception was the option of finding out via information on the back of a cash-for-food card, which was much more popular in terms of being recommended than it was in terms of being the actual source of information. Women recommended it 17 per cent of the time, third after posters and radio, compared to 7 per cent who had actually been informed about a mechanism through seeing it on such a card, and men recommended it 13 per cent of the time (in fifth place) compared to the 7 per cent mentioning it in relation to their own past experience. This recommendation may be about the assumption that those with the card are receiving support and so may not be solely about the feedback mechanism per se. There are geographical variations; for example, women who recommended friends and family were heavily concentrated in Puntland. The back of the cash-for-food card is now almost equally represented in Hiraan; in spite of zero mentions in response to the previous question about reality rather than recommendation.

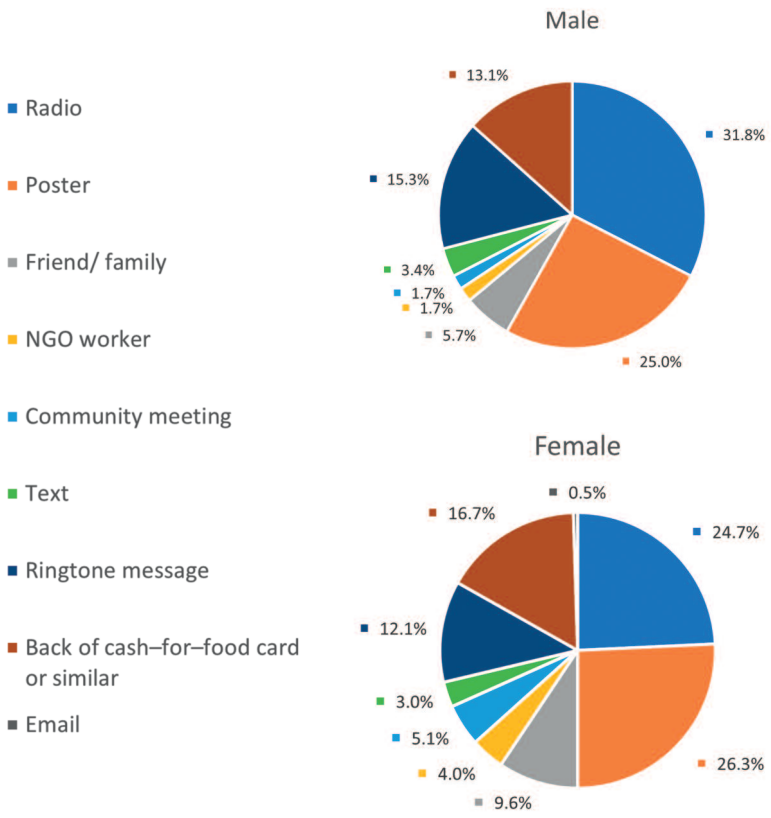
Perhaps surprisingly, as these are methods used by many agencies, including, in fact minority-led organizations (see examples below starting on page 15), our participants did not recommend either community meetings or NGO workers communicating verbally as their preferred way to reach people like them with information about feedback mechanisms. Women were more positive about both these options than men were; 5 per cent of women recommended community meetings and 4 per cent NGO workers; 2 per cent of men recommended both options. This may relate to low trust between these communities and many NGOs (which are perceived as being linked to instances of aid diversion known to the community.)

'Telephone is the best and easiest way to share information.'
Female IDP camp resident, Bosaso

'The best way to submit a complaint is oral.'
Female IDP camp resident, Borame

'Telephone may be the best but not everyone can afford to get one.'
Community leader, Burao

Figure 5: Preferences for ways of being informed about feedback mechanisms



Fear of reprisals and other implications, especially for minority women

The conversations in the FGDs then turned to those who were aware of feedback mechanisms but were either unable or unwilling to use them (see Fig. 6). Very disturbingly, 25 per cent of minority women participants reported being unwilling to use feedback mechanisms because they or others had faced reprisals when doing so or attempting to do so in the past. This was significantly higher than minority men, 19 per cent of whom said the same thing (which is still very high). This is interesting as men mentioned reprisals resulting from a complaint they had actually made more than women did, so women's reluctance to use mechanisms for this reason seems to be a fear which may deter them from even attempting to complain. The perception of risk for women may be significantly different than for men. This may relate to all Somali women's additional vulnerability to sexual violence, sexual harassment and coercion in many camp settings, as well as low access to justice and accountability, which is already widely reported.[13] We know that, in addition to the general level of vulnerability, due to their inability to access the customary law (Xeer) system, minority women are doubly vulnerable to these factors.[14] The team tried to probe to what extent reports of reprisals (or threats of them) when using feedback mechanisms was due to general knowledge versus personal experience (and clearly this is a sensitive subject to discuss in an FGD, some of which were mixed). Of the 25 per cent, 10 per cent did not specify where their

> *'We have triple discrimination which are: we are from a minority group; second, we live in an IDP camp; third, we are vulnerable because we are women.'*
> Female IDP camp resident, Jowhar

> *'We have faced many problems which influence our emotion and humanity and even sometimes we experience gender-based violence and did not get any assistance because we are minority women.'*
> Female IDP camp resident, Jowhar

> *'Women experience different kinds of gender-based violence but we cannot express ourselves because no one cares about problems of minority women.'*
> Female IDP resident in Baidoa.

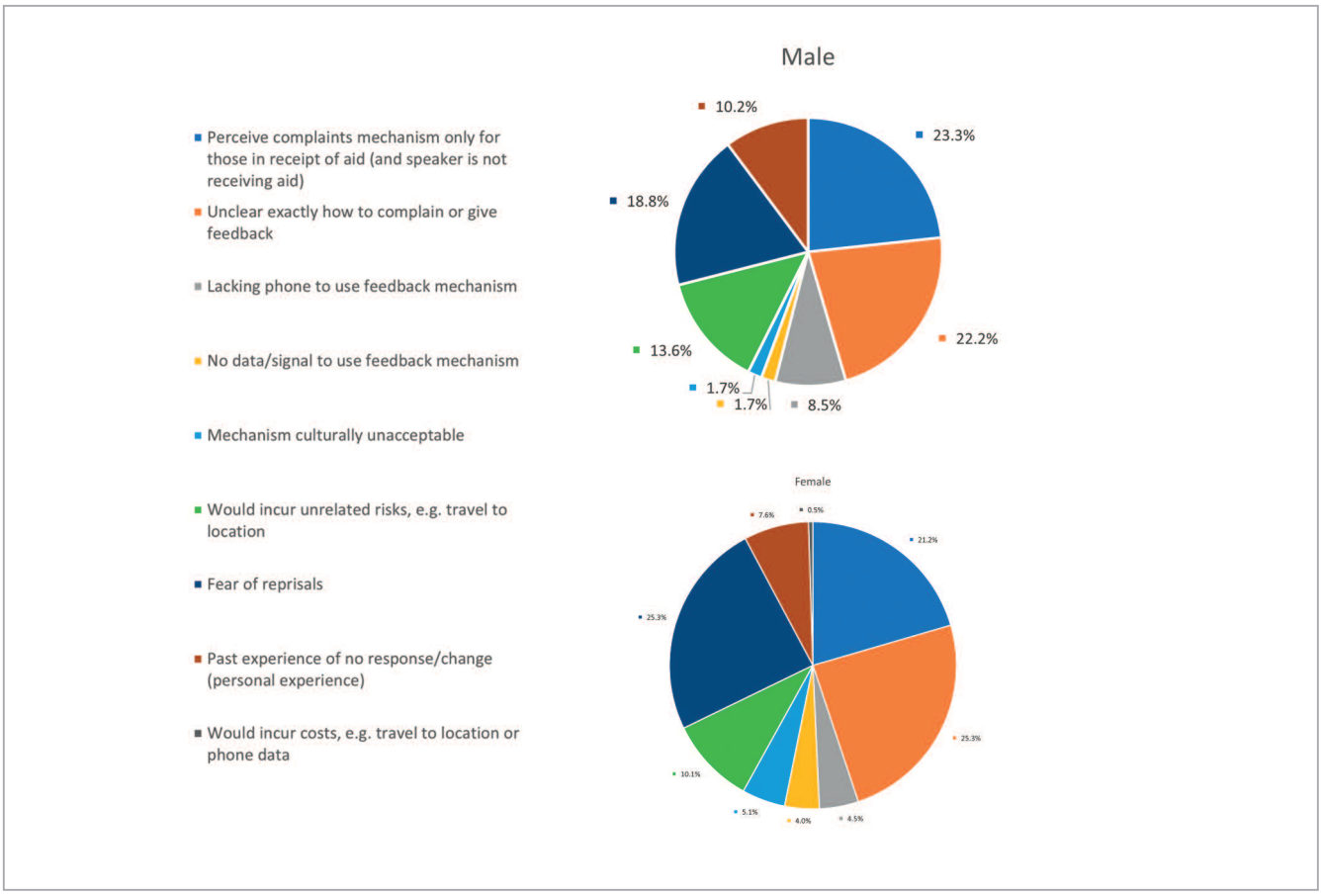
knowledge about this risk or eventuality came from, but of the remaining 15 per cent who did, almost all stated that it was based on personal experiences of the individual (6 per cent) or those personally known to them (9 per cent). As the quotes on page 12 show, the main types of reprisals mentioned were withdrawal of aid/support.

Women equally cited not knowing exactly how to go about using a feedback mechanism (25 per cent) as a reason for not using them despite being aware of them (see Fig. 6). When taken together with the 38 per cent of women who had stated that they were unaware of mechanisms reported earlier, this suggests at minimum that at least 40 per cent, and perhaps as many as 60 per cent[15] of all the minority women who participated in FGDs would not be sufficiently aware to have the option to use a feedback mechanism should the need arise. For men, 23 per cent said that they were not aware of exactly how to use mechanisms and 22 per cent that they would not use them because they are for those in receipt of aid or services (and these participants were not), 21 per cent of women participants also mentioned this reason. Other reasons mentioned were risks arising from the complaint process not directly as a result of the complaint, such as needing to travel to a location to make a complaint (14 per cent men and 10 per cent women, surprisingly almost all in Somaliland), not owning a phone (9 per cent men, 5 per cent women, more than half concentrated in five camps in Hiraan), not being able to pay for calls or data or there being no phone signal (4 per cent women, all in Puntland).

Strengthening CFMs for minorities

When asked what service providers could do differently to improve minority access to and use of feedback mechanisms, there were multiple suggestions that focused around improving the quality, reach and trust in the CFMs and guaranteeing no reprisals (see Fig. 7). Most people wanted complaint mechanisms to be effective – phone lines should be answered and action taken in response to the complaint (20 per cent men, 37 per cent women), followed by guaranteeing no threat of, or actual reprisals against anyone using a mechanism (17 per cent men and 21 per cent women). Other suggestions that came up were having visitors external to the area come and listen (6 per cent men and 19 per cent women – given that women earlier seemed less keen to actually speak to outsiders themselves, perhaps there is an intention that this is mediated by minority community elders). Other popular options were to remove gatekeepers (19 per cent women

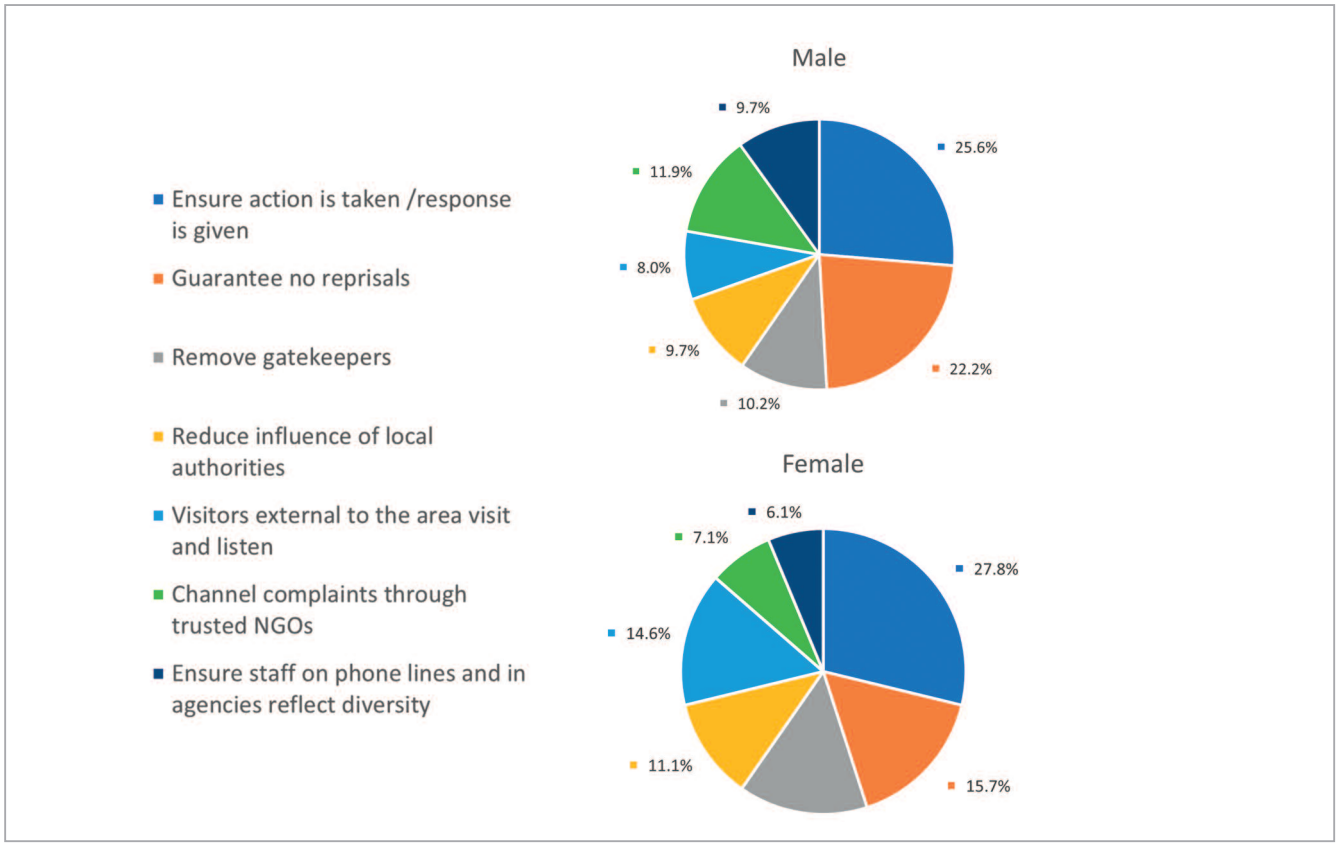
Figure 6: Reasons given in the FDGs for not using feedback mechanisms, though aware they existed



and 8 per cent men), to reduce the influence of local authorities (15 per cent women and 8 per cent men), to channel complaints via trusted NGOs (both 9 per cent) and to improve the diversity of those answering phone lines or working in humanitarian organizations (both 8 per cent). Again, there was geographic variation, with those in Somaliland focused on ending reprisals (over 50 per cent of all responses from 29 per cent of participants overall) and diversity of staff.

Those in Baidoa/Kismayo/Mogadishu were keener on involving outsiders; two thirds of all who gave that response were from this region, and over three quarters of those who mentioned channelling complaints through trusted NGOs were from this region. Participants from Puntland and Hiraan gave responses across all these options, with the exception of improving the diversity of staff in call centres and organizations, which was not suggested by anyone in these two areas.

Figure 7: Ways to improve the feedback mechanisms suggested in the FDGs



'Ways to make a complaint or give feedback is to have direct contact with NGO members.'
Gabooye teacher in Puntland

'Even sometimes one cannot do anything before consulting with government so we feel we are owned by others.'
Woman IDP camp resident, Garowe, Puntland

'All organizations shall work independently from the government, so that is the only way to get information that is accurate and reliable.'
Bantu community leader, Garowe, Puntland

'Our communities do not have a group of educated people who work in aid agencies, as well as representation in local, regional or national authorities who service them; they are a very weak social group; so always they don't have access to humanitarian assistance.'
Gabooye community leader, Somaliland

'Complaints can be lodged with honest and sincere people.'
IDP camp resident, woman, Jowhar

'Not all NGOs are the same, there are some who do not come back to you and interview you, and who look after their interests.'
Community leader, Jowhar

3 Complaint accompaniment/ minority exclusion process tracing examples

A Somaliland, Gabooye minority community

This example concerns a cash-for-food distribution programme carried out by an international NGO as an implementing partner for the WFP. It started in October/November 2021. An IDP site with residents in need was identified by the implementing partner; the site actually consists of two sections, one predominantly majority and one predominantly minority (this is not uncommon). The two sites are referred to as camp A and camp B, with the minority-occupied site being camp B. The cash-for-food distribution programme assessed the nutritional status of the camp B occupants as meeting the criteria to receive cash-for-food assistance. It was agreed that 500 households would be included within this distribution. (It is now disputed whether the 500 was supposed to cover both A and B camps or to be focused on B. Even if both camps were due to benefit, it might be expected that an at least 50/50 ratio would result, although all seem to agree that the needs of those in camp B were in general relatively high.) A group of local elders and local authority officials was convened to identify which of the camp residents would be included – aiming to identify those with particular needs, such as female-headed households or those headed by persons living with a disability. A list was produced – but this list included only 18 of the households (18 out of 500) then resident in camp B. The list was published and the residents of camp B, who had gained the impression that aid was slated for them, as their situation was worse and their needs highest, via a group of elders, attempted to complain to the local authority (however, no one was available to meet with them), to the implementing partner, and finally to the WFP. At this stage, WFP paused the distribution and began an investigation (which unfortunately did not produce any tangible results that we are aware of beyond the pausing of the distribution). Finally (two months later), the elders also approached DYDO (a minority-led organization based in Hargeisa and active throughout Somaliland). DYDO escalated the issue with WFP in Hargeisa and requested that an independent verification of the households included on the list be carried out. The situation then became very tense, with several people suggesting to DYDO that there might be serious security repercussions if the distribution to the 482 non-camp B residents was not allowed to proceed. MRG and DYDO's requests that the elders who had complained be involved in reviewing the list of recipients was repeatedly avoided, and DYDO and MRG were repeatedly told that the list had been approved by community elders, while the people we were in touch with living in camp B were stating that neither they nor anyone who represented them had been consulted. MRG and DYDO were told about several different ways forward on different occasions: that a new list would be produced (we asked for sight of it, but were told that this was not appropriate), that a meeting would be held to discuss and approve a (new?) list. A date for that meeting never materialized). In early February 2022, MRG and DYDO held a meeting with the implementing organization in question. In the course of that meeting it became apparent that the senior management of that organization in the relevant office were unaware of the complaint (which we considered a serious one in that it involved potential aid diversion) two to three months after it had originally been made, and after the distribution had been paused for at least six weeks. Many members of the community at camp B finally decided that they would not stay there to be used to justify aid distributions that were then redirected away from them (18/500 being less than 3 per cent of recipients being those they believed to be the intended beneficiaries). They decided to move to a new location – notably one where the camp is entirely populated and run by minorities themselves – resulting in additional displacement. In the course of a meeting between DYDO and senior WFP inclusion personnel in May 2022, it was agreed that the camp B list would be amended so that 100 of the households benefiting would be minority households, 400 would be those on the local authority supplied list. WFP gave an undertaking to DYDO that it would ensure that the camp B residents who had left would be assessed rapidly in their new location, although to our knowledge this did not take place, but support was put in place for them by agencies other than WFP

eventually. Positively as a follow up to this, other minority populations who are in need and who have not received aid have since been assessed for support with DYDO involvement and some support is now being provided. The justification given by WFP for allowing the distribution to the 400+100 list to go ahead is that there will be 'major problems' in the locality if this does not happen. DYDO and the community elders have agreed to allow this to go ahead, partly because a number of the original camp B residents have since left, and will follow up with WFP and its many implementing partners to ensure that the undertakings regarding getting aid to minorities are honoured. It must be noted that despite its considerable engagement, work undertaken and risks incurred in aiming to support WFP and implementing partners to work in ways that do not leave groups behind, DYDO has not been deemed eligible for the Somalia Humanitarian Fund (SHF), which would potentially allow it to apply for funding to run feedback mechanisms or support community engagement with mechanisms to identify and address biases in aid distribution which stem from and often replicate Somalia/Somaliland's unequal social structures. Relying on the efforts of DYDO, who incurred costs of transport, staff time, communications and so on in seeking to support WFP and partners to resolve such issues, is unsustainable if DYDO does not have funding to cover these costs. Essentially DYDO, a very small and poor organization, is subsidizing the efforts of the international community in an effort to get them to live up to their promise to 'Leave No One Behind'.

B Kismayo, Jubbaland, Bantu minority community

Another painful case happened in Kismayo's Farjano village, where many of the minorities are based in IDP sites in the outskirts of the district. One of the elders who was an eyewitness and was a member of the IDP minority committee shared the story with our enumerators concerning a particular incident, again involving distribution of cash assistance. As the elder explained, needy members of minority and marginalized communities were forced to pay half of any amount of money that was supposed to be provided to them; anyone who refused to comply with that rule was threatened with being cut out of the list. As members of the minority elders' committee confirm, although these incidents are common, no one can talk about it openly because minority beneficiaries are afraid to lose the remaining half of the cash to be allocated to them in the subsequent allocation period. None of the minority elders are invited when discussions take place and when cases of diversion of food take place, they are caught unaware. During needs assessment, minorities are not allowed to respond about their needs: they are either not present or they do not feel able to speak openly. Distribution is usually considered for non-minority communities, who get every priority although some (or even many) of them are not in the IDP camps. Community members report that officials in charge of camp management and distribution do not listen to complaints and just say that those who did not receive their portion of supplies should share with their relatives who received supplies.

C Berdale, Southwest State, Bantu minority community

On 24 November 2021, a very significant amount of food assistance was provided to a number of non-minority communities in villages in Berdale village in the district of Baidoa. A minority-led NGO ascertained that over 1,200 families among the to-be-supported population were minority and had been left out. Elders raised a complaint to the camp managers, who could not help and even appear to have discouraged the elders from submitting formal letters of complaint. Among those affected were malnourished children and elderly people who were in serious need of the food rations for which they had been waiting for a considerable period. Even after the elders took their complaint to the administration in Baidoa, visiting district officials there, no assistance was offered. Their request for an investigation was turned down, and they did not know what to do and who to approach to address the situation.

D Hirshabelle, occupational groups

In January 2022, as drought conditions intensified, a minority-led local NGO, MRDO, reached out to the WFP concerning minority communities in Hirshabelle region who were in need but had neither been assessed for nor were receiving aid. The families had all left their normal residences due to the drought, either because there was no water or they had exhausted all their food supplies. Minorities in southern Somalia often live in riverine areas and some of those affected this time were also in this group – some of whom had been displaced by major floods in 2018 and, as a result, had been issued with WFP SCOPE cards. Others who lived a little further from the riverbank had not been affected by the floods and this was their first displacement. The WFP's initial response to the approach was (a) that their cash-for-food programme was delegated to an implementing partner and (b) that all those who would benefit had already been identified. However, the WFP was able to agree that vulnerable and needy households within this group would be included in future rounds provided that MRDO was able to gather all the necessary details and triage the households. Given the

extreme need, MRDO felt it had no option but to do this and diverted the work of all its paid staff and many volunteers to gather and provide details of 1,435 households who were displaced by drought and in need of help. It did this using its own resources and the exercise took many people 3–4 weeks to complete. MRDO is not funded to do this work; it is not eligible for SHF funding and until recently had existed primarily using funds donated by diaspora communities. Minority inclusion is not sustainable if it is based on unfunded, unpaid, voluntary efforts. Not all minority communities have an NGO like MRDO (or our other genuine minority-led partners) in their area, and inclusion of minority groups cannot be reliant on this (especially if such efforts are ad hoc, unfunded and not systematically in place). A system that relies on such efforts to be inclusive will not be reliably or fully inclusive, and signals that inclusion is a low priority.

E Resolved complaint – Puntland

This example also concerns a cash-for-food distribution programme, this time organized by the local drought committee utilizing diaspora contributions. An IDP site was identified which had a primarily minority population, and assessments revealed that the nutritional status of the occupants met the criteria to receive cash-for-food assistance. As with the first example above a list was produced – with the involvement of the office of the mayor local to that IDP site – however this list was, again, largely made up of non-minority households. Puntland Minority Women's Development Organization (PMWDO), which operates in this area, received a complaint. PMWDO referred the case to those directly involved, but the initial response was that, as it was the local authority that had taken responsibility for creating the list, they could not intervene. PMWDO then escalated the matter to the provincial-level authorities in Garowe, who overturned the list of the mayor's office and requested the committee and PMWDO to collaborate to identify households within the originally intended beneficiary group.

News of such events, incidents and their outcomes, whether positive or negative, travels relatively quickly within minority communities and results in either increased faith or hopelessness, concerning whether or not the risks associated with reporting exclusion are higher than the potential benefits of doing so. This importantly impacts on individual decisions regarding whether or not to report minority aid diversion or exclusion via official channels.

4 Better practice example: the PMWDO hotline

PMWDO, which is a minority-led organization headquartered in Garowe but serving the whole of Puntland, has established a hotline to provide a credible, reliable and responsive means of gathering feedback from rights holders. The hotline launched in February 2022; it has received 222 calls over the subsequent five-month period. Importantly, the hotline is not intended to gather feedback on PMWDO's services or operations but exists to act as a bridge between communities and all service providers in the area. Anyone can call the hotline about any problem impacting on their community that is relevant to either humanitarian or development assistance. The hotline receives calls on a wide range of topics. PMWDO has considerable outreach programmes across Puntland and has used this to advertise the hotline via community meetings (which were happening for other reasons in any event) and posters (see Fig. 2). When a call is made to the hotline, basic details about the issue are gathered. In emergency cases, help is organized swiftly (e.g., in one case involving transport to hospital and hospital admission). Where the issue concerns an area where PMWDO is delivering services, the issue is raised with the relevant team and PMWDO's partners and allies (e.g., in one case IDP camp residents pointed out that there was no school functioning in their camp; this was remedied and a PMWDO ally organization agreed to establish a school, which is now functioning). Other examples, include provision of piped water to IDP camps and construction of a borehole by the Puntland authorities, the site selection was prompted by feedback on the hotline. PMWDO attends all the cluster coordination meetings in Puntland and is able to feed in information reported via the hotline to those discussions. Confidence in the hotline has grown over time, with women and girls feeling able to report about sensitive issues (e.g., gender-based violence). Other common issues have included lack of clean/any water, lack of livelihood, food assistance needed, education, and lack of non-food items.

The hotline is not expensive to run per se (one staff member answers the phone, records the details and refers on to colleagues for emergency or longer term action). The calls are toll free to the user and thus there is a cost to PMWDO of US $500 per month but this is not unaffordable. (In fact, community members had had negative experiences in the past of being charged to use supposedly toll free numbers and took some persuading that they would not actually be charged to call the number.) The most important thing about the hotline is that those who raise issues, see and hear the results of having raised the information. In PMWDO's case, with its close links to the communities in question, this is primarily done via community meetings. Thus, although the hotline itself is low cost, its effectiveness relies heavily on PMWDO's wider funded staffing (e.g., to attend and feed into cluster meetings, to follow up on issues raised) and PMWDO's reputation and relationships of trust with decision makers. Local knowledge is essential in understanding the causes and potential solutions to the problems raised. Interestingly PMWDO decided not to ask callers their minority or majority status, instead asking only about gender and disability to ensure inclusion. It must be noted that PMWDO is the sole minority-led organization (that we are aware of) that is currently eligible for SHF funding and indeed the SHF has contributed to the pilot phase of this hotline and the wider staffing and services that it requires to be effective.

Essential features of the service include:

- The phone is always answered (if the staff member is taking a call, the staff member is notified of a missed call and calls back to the missed caller's number).
- The line is not restricted to the operations or services of one agency; a concern can be raised about any agency or service.
- PMWDO works very hard to try to ensure that the issue raised by every caller is passed on to those responsible and staff follow up to see if it has been resolved and addressed.

PMWDO is not the only organization running such a help line. MRDO is also doing so (see Fig. 8), albeit without being able to provide a toll-free number as they do not have funding. The fact that minority-led organizations feel the need to set up and run these services alongside generalized mechanisms – including in cases where they are receiving no funding specifically to do so (and they choose to use their general contributions from the diaspora) suggests that they feel that something is truly wrong with the alternatives in place.

Figure 8: MRDO helpline posters

5 Conclusion and recommendations

Given the security constraints in Somalia/Somaliland and the clearly acknowledged political, economic and social stratification that has the potential to insert bias and exclusion into interventions, the upward flow of information from the grassroots to anyone making an intervention is potentially extremely valuable. It is, of course, at times inconvenient to anyone who may prioritize their own clan or other interests, for reasons of either tradition or electoral advantage. All parties agree, in theory, that aid and development efforts must go to those who need them most. And feedback has the potential to generate data and allows for the holding of anyone and everyone accountable to this agreement in practice.

All parties must therefore invest in feedback mechanisms that are inclusive of all, that *work,* that generate actions and feedback, and that gradually build trust in communities to take the risk to interact, to engage and to stand up to power holders who may, on occasion, abuse the power that they are privileged to deploy.

The following four areas are recommended for improvement, each with a series of concrete steps outlined further below:

(a) **Make existing feedback mechanisms responsive and close the feedback loop** by ensuring that all complaint mechanisms are well supported and properly engaging with all members of all communities.
(b) **Broaden the scope of feedback**, ensuring that all concerned convey the message that mechanisms can be used to submit feedback about non-receipt of services, and are not intended to be used solely by beneficiaries actually reached by that provider.
(c) **Invest efforts into outreach and education about feedback mechanisms** so that all community members, and not just recipients of assistance, are aware of them and feel able to use them. Ensure that local authorities are aware of and engage with feedback mechanisms appropriately.
(d) **Hold community engagement sessions** to articulate the aims, process and benefits of the active complaints feedback mechanism which exists within a community. Build trust that their feedback will be handled honestly and fairly, and foster among all community members a belief in their right to use them.

Concrete steps that could be taken to achieve this are:

(a) **Ensure existing feedback mechanisms function effectively, are responsive and close the feedback loop**:

1 Carry out regular mid-scale 'mystery shopper'[16] type exercises to check the functionality of existing mechanisms, these should be run by independent or arm's-length organizations. Publish the results bi-yearly.
2 Demonstrate timely adjustments and improvements to mechanisms in light of the feedback from such exercises at sub-national and national levels.
3 Ensure diversity of staffing in terms of both gender and minority/majority clan status.
4 Arrange for an independent (potentially shared) investigation team to look into all allegations of racism, reprisals or failure to engage with those who wish to provide feedback.
5 Hold quarterly complaints feedback engagement sessions with the community to understand how the system can evolve and become more accessible to all members of the community, ensuring the participation of women or holding women-only discussions in addition.
6 Offer multiple avenues for complaints and feedback to communities, including verbally, by radio, phone and via minority rights organizations, women-led organizations and platforms sensitive to gender-based violence (GBV) and child abuse. This is essential to offer to those threatened with reprisals so they will still report problems. Reports of threatened reprisals should be prioritized by organizations for response within 48 hours.
7 Ensure that all proposals and current projects have adequately budgeted for CFMs to reach the most marginalised and vulnerable populations - with clear markers for intersectionality (where a minority clan member is a pregnant female, elderly person without a carer, or has a disability, the CFM needs to reach them first in their preferred way). This budget needs to be clearly outlined and justified to the donor. This budget should include ensuring free and equal access to all information about an intervention to all community members (both beneficiaries and non-beneficiaries).

(b) **Broaden the scope of feedback so it goes beyond feedback on one particular service that beneficiaries alone use**:

1 Ensure that publicity for feedback mechanisms makes abundantly clear that they are intended for those who are excluded from a service but have feedback about it or their exclusion, as well as those who are receiving it.
2 Find ways to share information and ensure complaints do reach the responsible party. It is not reasonable to expect those on the ground (especially those who are not receiving a service) to know which mechanism would be appropriate to use to make a complaint It is not reasonable to expect those on the ground (especially those who are not receiving a service) to know which mechanism would be appropriate to use to make a complaint.
3 Arrange for consortia or independent organizations to run feedback mechanisms not linked to any service provider at province level (building on the PMWDO model of doing so, outlined on page 18-19). This could either replace or complement feedback mechanisms run by service providers for their users. To ensure minorities are reached, there is a strong case for having such mechanisms run by verified minority-led organizations, or in consortia in which minority- and women-run organizations have significant involvement and authority.
4 The process of tracking and accompaniment of complaints piloted during this research, which was primarily intended to allow understanding of specific mechanisms to emerge and be documented, also resulted in the reversal of decisions that excluded minorities on a number of occasions and active efforts to include minorities in others. These efforts are useful but have no funding and most minority-led NGOs are not eligible for assistance from the Somalia Humanitarian Fund (SHF) (which is what PMWDO used to run their hotline and follow up on complaints). Thus, UNSOM should expedite a new SHF eligibility round and ensure minority-led organizations are considered within that process. The SHF could encourage applications to enable much-needed work to run independent hotlines, as well as accompany and follow up on complaints that have merit and which show evidence of likely aid diversion. This in turn could help identify and address biases in aid distribution and accountability, which stem from and often replicate Somalia/Somaliland's[16] unequal social structures.

(c) **Put efforts into outreach and education about feedback mechanisms**:

1 Use posters, radio spots, ringtone messages and (inclusive) community meetings as the most effective way to let minority community members know about feedback mechanisms. Sole reliance on the reverse of SCOPE[17] or cash-for-food cards is not recommended as it implies that feedback is only welcome from those in receipt of support.
2 Engage communities on the design, purpose and use of mechanisms: Once a CFM (or multiple CFMs) are established to reach the most marginalised communities, aid actors need to conduct 'conversations with communities' using multiple channels, so that women, men and children are aware of their right to freely ask and have answered their questions or concerns – without reprisal and indeed with trust that their efforts will at least be responded to. This engagement can be through face to face engagement leveraging minority networks, or through media channels or technological solutions.
3 Outreach should be translated into or be inclusive of at least the Maay dialect of Somali, and ideally incorporate text or speech in Bajuni, Bravanese/Chimbalazi, Eyle and Mushunguli (Eyle may be useful only orally in radio spots). Inclusion of these languages in text, or using terms from them orally, signals openness to receive feedback from speakers of these languages; it may not be necessary to translate the entire text on a poster to reach out to communities, many of whom may also understand Somali.
4 Publicize positive stories of how feedback has led to positive change for communities (when it works well) to counteract the long-standing mistrust in feedback. This should be done once agencies are confident that any problems with the functioning, responsiveness and fairness of existing mechanisms have been sustainably resolved.

Annex I:

Extract from Minority Inclusion Learning Review (published 2021, pp. 33–5)

The survey asked about awareness of feedback mechanisms. This was asked of all respondents as well as separately to those respondents who had actually benefited from at least one intervention with the results being shown in Figure 2. 8. In general, those in minority-only settlements were less likely to be aware of how to raise a complaint or give feedback (minority 40 per cent; host 45 per cent; IDP 53 per cent), of those who were aware, they were also less likely to have actually made a complaint or given feedback (minority 63 per cent; IDP 72 per cent; host

Figure 2.8: Awareness of any/all feedback mechanisms

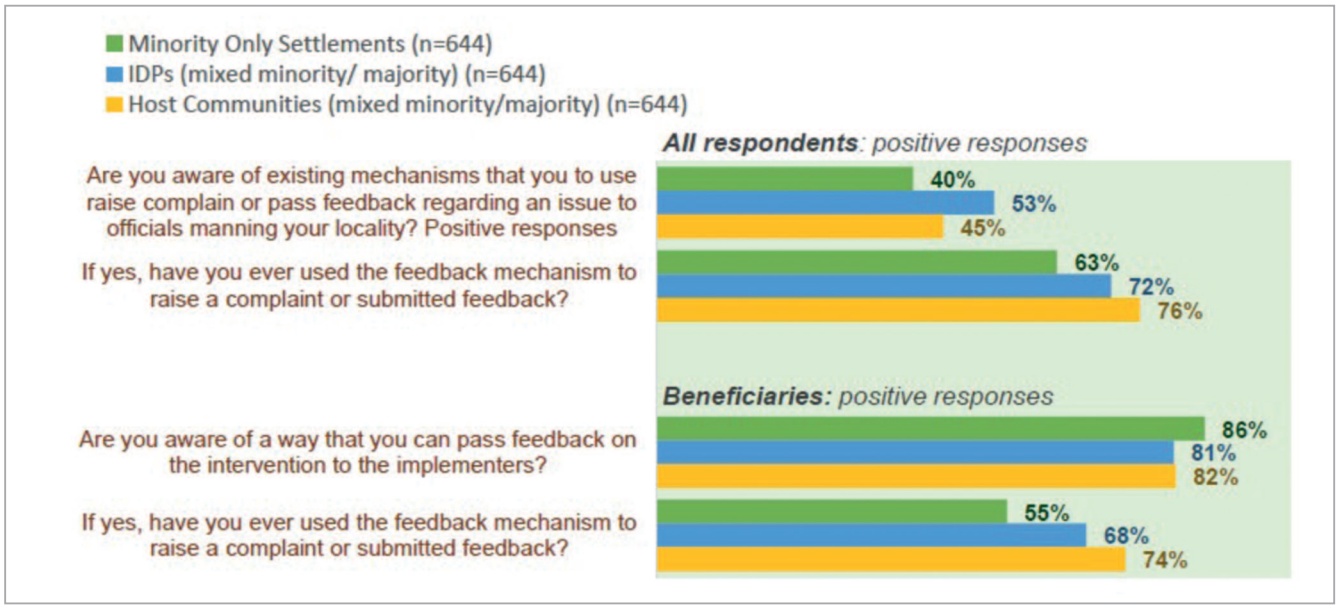
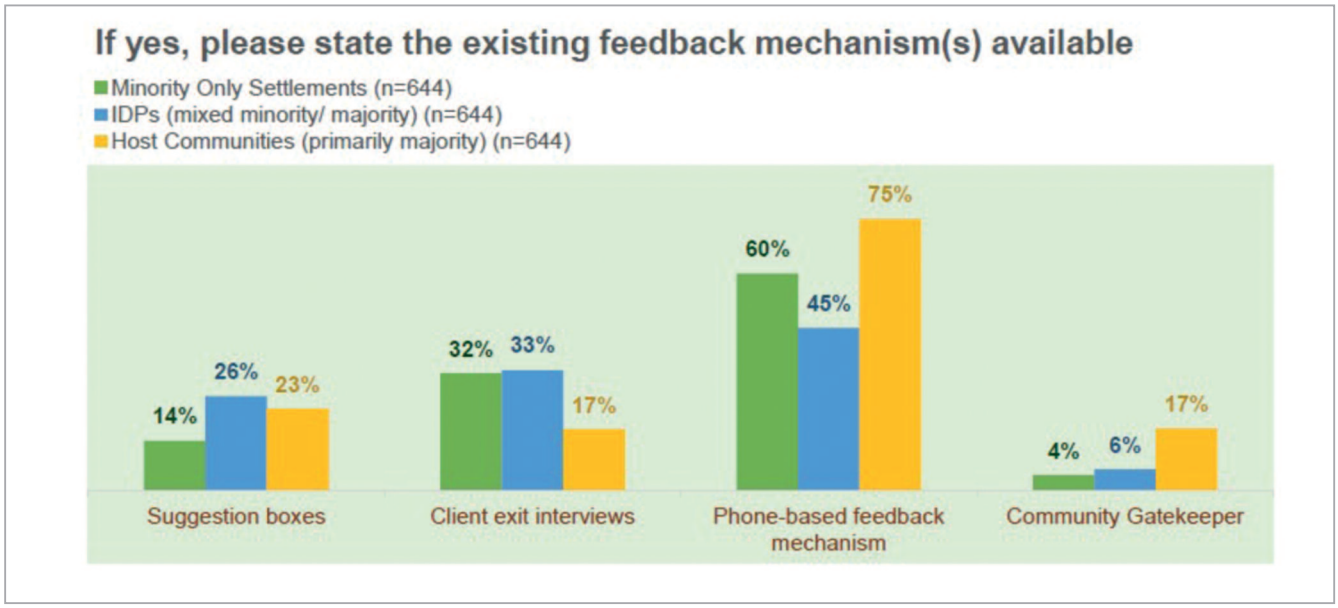


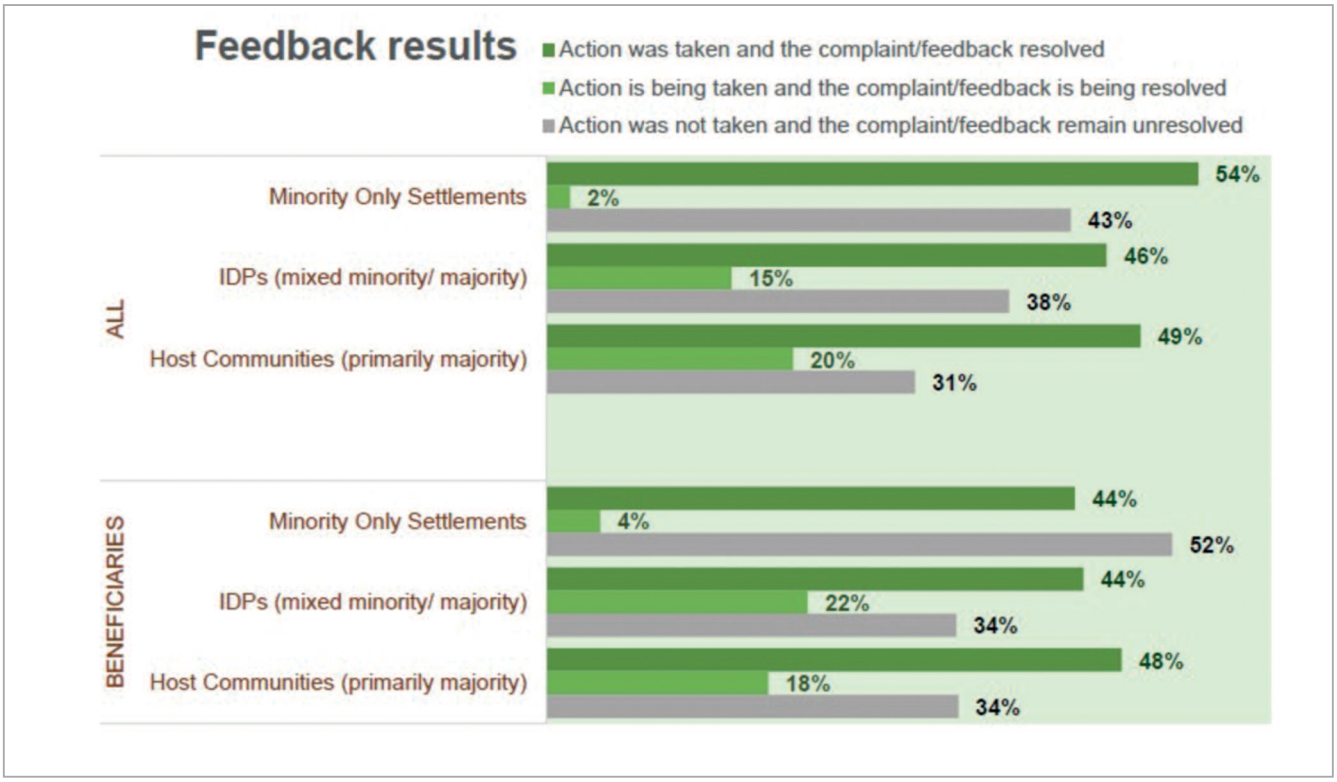
Figure 2.9: Available feedback mechanism(s)



76 per cent). For those who had accessed an intervention, although minority settlement respondents were slightly more likely to be aware of a feedback mechanism (minority 86 per cent; host and IDP both 82 per cent), they were still less likely to have used it (minority 55 per cent; IDP 68 per cent; host 74 per cent). For those who were aware of ways to complain or provide feedback, there were interesting patterns in the types of mechanisms known about; with host communities more likely to rely on phone, gatekeeper and physical visits, those in IDP camps least likely to cite phone-based methods (possibly because they have access to providers more directly), and those in minority settlements least likely to cite gatekeepers but most aware of phone-based methods. The latter is an important finding given the move towards phone-based sources of information gathering during, and potentially post, Covid.

Those in IDP camps most often reported that they did not use complaint mechanisms because they did not need to raise any issue and for IDPs in camps trust in complaint mechanisms was high at over 95 per cent. Those living in host communities and minority only settlements were much more likely to report distrust in these mechanisms although these levels were still relatively low (12 per cent and 13.5 per cent of all responses respectively). Clear differences were found in the responsiveness of those responsible to the feedback or complaint by minority, IDP and host settlement (see Fig. 2. 10). Minority settlement residents were slightly more likely to have already had a positive response to their issue (minority 54 per cent, host 50 per cent and IDP 46 per cent). Minority settlement residents were much less likely to be promised something would be done and to be waiting to see the result (minority 5 per cent, host 18 per cent, IDP 22 per cent) meaning that overall minorities were slightly more likely to be left feeling that nothing had been nor would ever be done (that they were aware of) (minority 43 per cent, IDP 37 per cent and host 30 per cent).

Figure 2.10: Response feedback



Annex II:
Methodology note

a) FGDs

The four partner organizations listed on the title page ran between them a total of 34 FGDs in a wide variety of locations involving 374 individuals (including 176 women). Participants were all members of minority communities in Somalia (as defined below) and were selected to represent, as far as possible, a range of individuals from that location, including community leaders, religious leaders and some with educational qualifications as well as more typical IDP camp residents. Each FGD initially followed a script, but the partners' staff were able to develop topics and ask detailed follow up questions as required. Scripts were analysed in Somali for data relating to the main topics of the study and further analysis was carried out on the resulting data by the wider team/authors. The selection of quotes was done in Somali. The FGD script is available on request, please contact info@minorityrights.org.

b) Complaint accompaniment

This process was also led by the four partner organizations, all of which have close links with the communities concerned and regularly field complaints that groups of minority clan individuals have about aid diversion or minority exclusion from aid. As mentioned in the main text, we originally hoped to encourage individuals affected to raise complaints and to record their progress through the complaint system and the outcome, potentially including video evidence of this process. This proved unachievable partly because we discovered that in some cases feedback phonelines were simply not answered. When it came to making a complaint in person, individuals in IDP camps were too nervous about potential reprisals against them and their households to proceed with accompaniment. Hence the team switched tactics to pursuing complaints by elders or others that had already been made but had not resulted in any change (such as those in Burao and Puntland). The methodology concerned therefore involved trying to resolve the complaint whilst keeping careful notes of correspondence, meetings and outcomes. This resulted in a much smaller number of tracked complaints but valuable insights into when, how and by whom decisions were made that had resulted in minority exclusion.

Annex III:
Defining minorities

The concept of minority is complex, confused and contested in Somalia. Somalia has two main languages which most members of most major clans (and some minority groups) speak: Mahaatiri or Maxaa-tiri (also known as Northern Standard Somali) and Maay (also referred to as Mai and Mai Mai). A number of other languages are spoken in Somalia, all by linguistic minority communities including Bravanese, Mushunguli, Eyle and Awer. Other than linguistic diversity, Somalia/Somaliland has also had significant ethnically and racially distinct coastal populations resulting from ancient and modern in-migration and inter-marriage (e.g. Bravanese and Banaadiri communities, also those descended from inter-marriage between Italian occupiers, their Eritrean workers and local communities). Somalia also has significant Bantu populations. The latter are seen by many as in-migrants (and some, but not all, may indeed have arrived as captured slaves) but in fact many Bantu occupied and farmed many riverine areas considerably prior to Somalia's independence and potentially much further back in time as well. In other cases, concerning traditionally hunter-gatherer groups (e.g., Eyle or Awer) they are almost certainly indigenous to the area and pre-date the in-migration of Somali pastoralists. Thus, assertions about Somalia's homogeneity are at the very least exaggerations, and as has been stated by UN OCHA,[18] deliberately or conveniently ignore many of the minority communities that report exclusion and marginalization in Somalia. Other than these ethnic/racial and linguistic diversities, another critically important factor that defines minority communities in Somalia is clan heritage. To quote the UN Office of the High Commissioner on Human Rights (OHCHR): 'Somalis are divided into clans and numerous sub-clans and the clan structure remains socially and politically important in every aspect of Somali life. The main four clans are: Darod, Hawiye, Digil and Mirifle (sometimes referred to as Rahanweyn) and Dir.'[19] The clan is a key social, economic and political structure throughout Somalia/Somaliland that mediates access to resources, opportunities, influence, protection and relationships (e.g., marriage, patronage). Traditionally these clans entered into relationships with other groups, traded with them or offered them protection, in return for their labour or cooperation (particularly concerning tasks which the higher status clans considered unclean or low status – leatherwork, metal work, pottery and certain ritual practices). Thus, groups emerged that were defined by their occupation, which was inherited by birth. Essentially, these groups formed a lower status caste level in society that was subservient to the major clans. Somali society today includes the descendants of these groups; the Gabooye, Tumaal and Yibir communities (which also have many internal sub-divisions or sub-clans). These groups face discrimination based on descent, analogous to caste discrimination in South Asia.

To summarize the above, and to aid those seeking to gather data, MRG recommends that the following minority communities are included as options when minorities are asked to self identify in surveys or other research methods:

Main or preferred term	Alternative terms (includes some sub-clans) *Terms used but which may be considered offensive by some are in italics*	Type of minority	Linguistic minority
Asharaf	–	Islamic sub-group	–
Aweer	Awer / *Boni* / *Waboni* / Sanye	Hunter-gatherer origins – traditional land in Boni forest straddling Kenya/Somalia border	Yes
Baajuni	–	Originally coastal community	Yes

continued from Page 25

Main or preferred term	Alternative terms (includes some sub-clans) *Terms used but which may be considered offensive by some are in italics*	Type of minority	Linguistic minority
Banaadiri	Shanshiyo	Originally coastal community	Yes
Bantu	*Jareer* / Gosha / Makane / Shiidle / Reer Shabelle / Mushungli	Visible minority, primarily settled in riverine areas of southern Somalia but high displacement to urban centres, including Puntland and as far north as Somaliland	In some cases
Bravenese	Barawani / Reer Hamar / Reer Galab	Originally coastal community	Yes
Eyle[21]	Eylo/Eelaay	Hunter-gatherer origins (section of Bantu cluster)	Yes
Gabooye	Mahdiban / *Migdan* / Musa Dheriyo	Occupational group	Unclear
Tumaal	–	Occupational group	Unclear
Yibir	Anas	Occupational group	Yes (but used only internal to community)

While non-Somalis find the major and minority clan delineations confusing, it is an accepted part of Somali political life, embedded in a power-sharing arrangement known as the 4.5 formula, usefully summarized by the UN as follows:

> *'Somalia uses a 4.5 formula, which is a political power-sharing agreement that gives an equal quota to [the] four major clans and a half-point to the cluster of 'minority' clans made up of a host of 'smaller' and marginalized clans which are categorized into two groups: ethnic groups (Somali Bantu, Banaadiri and Arabs who fall outside the traditional Somali clan structure and are seen to be of foreign origin) and occupational groups (a caste of artisans). The half-point (0.5) denotes the assumption of their being regarded as small in numbers and not carrying significant weight politically and socially.'*

The table above largely follows (but does not endorse) the 4.5 formula delineations of who is a minority clan (as in who falls into the group allocated the 0.5 of seats). It must be noted, however, that minority leaders believe that major clans also use up some of the spaces allocated to the groups covered by the 0.5 by allocating them to sub-clans of the major clans to further erode minorities' participation and representation in political decision making. Any such groups are not considered minorities for the purposes of this study. Notably, Somaliland does not use this formula and has a direct electoral system, but even there most people are aware of and understand the 4.5 system.

Notes

1 That study found that 40 per cent of those in minority-only settlements were aware of CFMs (compared to 53 per cent of those in mixed majority-minority IDP sites and 45 per cent of those in host (primarily majority) communities. In terms of using CFMs, 63 per cent of respondents reported having used one compared to 72 per cent of mixed IDPs and 76 per cent of host communities. See Annex I.

2 In some cases, decisions resulting in exclusion were rectified after we became involved, but this required multiple interventions on our part and clearly would not have been the case had we not become involved.

3 Mystery shoppers are ordinary consumers paid in many wealthier contexts to use a service or purchase items. They provide systematic feedback to the company concerned about their experience of doing so. This is used by companies to identify whether or not systems work well and to gather feedback on staff performance. The individuals do not identify themselves to staff and present themselves as any other shopper or user thus ensuring that they do not get special or different treatment.

4 Throughout this report, the authors use Somalia/Somaliland to refer to the combined area de facto controlled or claimed by the authorities in Mogadishu and Hargeisa. This does not imply any recognition of the legal status of any territory.

5 This is a form of identification card that includes biometric data that enables WFP to be clear exactly who is receiving cash or food.

6 Note on percentages. In the FGDs, with the exception of two questions, participants were free to mention more than one answer in the conversation. For example, when asked about how they became aware of a feedback mechanism, they might potentially point to several ways simultaneously. Thus, in almost all cases, the total percentages add up to more than 100 per cent. The two question areas that were exceptions to this were 'Are you aware of any way to raise a complaint?' and 'Have you ever made a complaint?' Because of the nature of FGDs it was not always possible to gain a clear answer on even these questions from each and every participant, so the percentages ranged between 95 and 100 per cent.

7 CCCM Cluster Somalia, 'Complaints and feedback mechanism (CFM) – monthly summary report for June 2022', available at https://data.unhcr.org/en/documents/details/94250

8 The discussions concerned potentially more than one complaint made per aware participant, hence percentages add up to more than 100 per cent as participants could report different results from different complaints.

9 Our analysis counted both those whose complaint was substantively addressed as well as those who accepted as satisfactory the reason given why it could not be addressed, in this group.

10 As documented in Thomas, C. and Otieno Opiyo, G., *Minority Inclusion Learning Review of the Ministry of Foreign Affairs of Switzerland: Programmes in the Horn of Africa,* London, Minority Rights Group International 2021, https://minorityrights.org/wp-content/uploads/2021/07/Revised-Final-Report_Minority-Inclusion-Learning-Review_27_07.pdf

11 Feedback mechanisms are largely perceived as being in existence in order to allow those in receipt of support to give feedback concerning that support or a linked issue. This leaves open the question of how those who are NOT receiving any support (but who feel that they are entitled and should be) can provide feedback. This perception is not limited to beneficiaries/rights holders, it is also implicit in the way that messages are worded on cards and posters (see Figures 4, 5 and 6).

12 Akou, H.M., *The Politics of Dress in Somali Culture,* Bloomington, IN, Indiana University Press, 2011.

13 https://www.globalprotectioncluster.org/wp-content/uploads/somalia_gbv_advocacy_brief_05march21.pdf

14 https://minorityrights.org/publications/looma-ooyaan-no-one-cries-for-them-the-situation-facing-somalias-minority-women-january-2015/

15 This appears to conflict with the finding that 50 per cent have actually used one, but the mechanism that they used previously may no longer be available to them (in the context of frequent and repeated displacements).

16 Throughout this report, the authors use Somalia/Somaliland to refer to the combined area de facto controlled or claimed by the authorities in Mogadishu and Hargeisa. This does not imply any recognition of the legal status of any territory.

17 This is a form of identification card that includes biometric data that enables WFP to be clear exactly who is receiving cash or food.

18 'Until recently, many people perceived Somalia as a country with a population of 7,000,0000 people who share one culture, one language and one religion. This was the impression given during previous regimes in order to sustain the illusion of homogeneity. One of the things that were deliberately downplayed was the existence of minority groups.' A study on Minorities in Somalia, UN OCHA 2002: https://reliefweb.int/report/somalia/study-minorities-somalia

19 Voices Unheard, OHCHR, 2019: https://unsom.unmissions.org/sites/default/files/voices_unheard_english_final.pdf

20 Not to be confused with Eelay – sub-clan of the Rahaweyn of the Digi-Mirifle cluster of communities.