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**Towards 'Shared' and 'Complex' Disaster Governance in Bangladesh:
The 2017 Rohingya Exodus**

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66 **1. Introduction**
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70 Bangladesh is the 10th most exposed country to natural hazards, and the fifth most at risk of
71 an extreme natural event turning into a disaster according to the United Nations 2016 World
72 Risk Report. The country is exposed to both slow and quick onset disasters, including annual
73 floods¹, cyclones², salinity intrusion³, earthquakes⁴ and landslides⁵; many of which have
74 generated significant scholarly research as noted in the citations. Natural hazards aside, the
75 country is also at risk of emergencies stemming from political developments within and outside
76 of the country. The Rohingya exodus that began on 25 August 2017 saw more than an
77 estimated 723,000 people flee from Myanmar to Bangladesh.⁶ The Independent International
78 Fact Finding Mission on Myanmar found many violations that led to the death and flight of
79 Rohingya amount to the gravest crimes under international law and called on the international
80 community to investigate and prosecute named Senior Generals in the Myanmar military in
81 an international criminal tribunal for genocide, war crimes and crimes against humanity.⁷ While
82 there is scholarly literature on Rohingya in Bangladesh and Myanmar, the studies are often
83 couched in terms of a security issue,⁸ their impact on Bangladesh-Myanmar relations,⁹ the
84 role of UNHCR policies for Rohingya in Bangladesh,¹⁰ their human rights situation when in
85 Myanmar¹¹, the role of Faith-Based Organisations in Bangladesh and their role in governing
86 the previous waves of Rohingya exodus in the early 1990s or late 1970s,¹² or the humanitarian
87 response in Rakhine state in Myanmar.¹³ However, the combined issue of natural hazards and
88 Rohingya in Bangladesh in the scholarly literature are treated separately. However, since 25
89 August 2017, Bangladesh is a refuge for some 646,000 additional Rohingya and displaced
90 persons from Rakhine in Myanmar. These two literatures need to be drawn upon in our
91 investigation of the issues facing the dual governance challenges of natural hazards and
92 displaced populations, which can create complex humanitarian emergencies.
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104 A range of actors, including the civilian government at all levels, security forces, international
105 development institutions, local and international Non-Governmental Organisations (NGOs)
106 are responsible for the country's disaster management. Within the national disaster
107 management framework, under the Ministry of Disaster Management and Relief, is the Office
108 of the Refugee Relief and Rehabilitation Commission (RRRC). This Commission has oversight
109 over the whole refugee population. While it falls under the mandate of the MDRR, it operates
110 largely alongside the disaster management offices. Coordination between actors in the
111 governance of natural hazards and governance of the displaced population appears limited.
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121 Furthermore, the involvement of other state actors, international organisations, INGOs and
122 Local NGOs in the response to the Rohingya provides a complex governing structure. With
123 such a diversity of actors, coordination is critical to the quality of humanitarian assistance
124 provided to host and refugee communities. Disaster management laws, regulations and
125 policies in Bangladesh have institutionalised civil-military coordination between the actors.
126 These provide the framework to govern both the Rohingya response and emergency
127 preparedness and response to natural hazards like monsoons.
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132 This article investigates the challenges that Bangladesh faces in disaster governance,
133 particularly since the most recent mass influx of Rohingya in 2017, by assessing how prepared
134 the country is for disasters and how disaster response operations are conducted by state and
135 supported by non-state actors. The 2017 Rohingya Exodus occurred against the backdrop of
136 recovery efforts for Cyclone Mora that hit Bangladesh in May 2017 and preparations for the
137 monsoon season, which began in April 2018 and makes it an appropriate example of the
138 disaster governance challenges faced in a complex humanitarian emergency. It is important
139 to assess the recent developments in Bangladesh and begin to trace the evolution of disaster
140 governance from local to national and international actors. It is therefore incumbent upon us
141 to draw on the works of Dorothea Hilhorst and the theory of Social Domains. Social Domains
142 are the marketplace of idea concerning risk and disaster, where they are exchanged, shared
143 and organised.¹⁴ Indeed, the earlier work of Russell R. Dynes on the concept of “shared
144 governance”¹⁵ has much to offer in understanding the prospects and challenges of disaster
145 governance in Bangladesh.
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153 This theory moves beyond environmental change, urbanisation, and modernisation to include
154 developments outlined above in the literature review including but not limited to securitisation,
155 role of international science and politics.¹⁶ Indeed, the politics of governing complex
156 humanitarian emergencies are significant when investigating the Rohingya situation in
157 Bangladesh. For example, we see the dispute at a high political level between the two
158 governments of Myanmar and Bangladesh disagreeing with what to call this group of people.
159 The Bangladeshi government chose to label them as registered Myanmar National, whereas
160 this categorisation is rejected by the Myanmar government, which in turn prefers displaced
161 persons from Rakhine. This particular case has the potential to act as a ‘transformative political
162 moment’, as espoused by Rajesh Venugopal and Sameer Yasir¹⁷, as it could alter the way we
163 govern disasters particularly when it comes to complex humanitarian emergencies where
164 natural hazards and displaced populations overlap.
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171 In other relevant works drawn upon for broader country studies, we have identified the
172 importance of the transdisciplinary approach to disaster governance. Such an approach
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180 recognises the capacity strength of sectors and the coordination benefit of interdisciplinary
181 actors combined with affected community engagement and will generate a wide variety of
182 perspectives that have the combined power to address real-world problems and design
183 solutions.¹⁸ With such a chorus of opinions, it is necessary to embrace these perspectives and
184 look beyond traditional toolkits and theories to build complex arguments that answer such real-
185 world problems, often referred to as “analytical eclecticism”.¹⁹ Such an approach moves us
186 beyond the juxtaposed and linear top-down, bottom-up frames towards a more inclusive
187 governance that recognises the collaboration of a wide array of stakeholders operating across
188 different scales.²⁰ In more recent works, this is referred to as ‘net-centric governance’ which
189 transcends the dichotomy between control and collaboration.²¹

195 This article outlines Bangladesh’s disaster risk context and discusses the country’s exposure
196 to natural hazards and human-induced disasters, as well as the socio-economic and political
197 factors that make it vulnerable to complex humanitarian emergencies. It then examines
198 government policies, structures and mechanisms available that support disaster management
199 and coordination in the context of the Rohingya Exodus, the challenges facing key actors in
200 responding to a human-induced disaster against the backdrop of a looming monsoon season.
201 It therefore raises a central research question, which is ‘To what extent, if any, is disaster
202 governance in Bangladesh transitioning to govern complex humanitarian emergencies?’ This
203 article will focus on the role that coordination, accountability and localization play in the current
204 Rohingya case study and its implications for disaster governance in Bangladesh. Finally, the
205 article identifies some signposts toward improving disaster governance in Bangladesh.
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215 **2. Methodology**

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218 This article is prepared based on desk research and in-depth semi-structured interviews with
219 humanitarian and disaster relief practitioners in Bangladesh. For desk research, the authors
220 conducted a literature review of key government policy documents, academic writing and
221 institutional reports on disaster management practices in Bangladesh. The aim is to identify
222 Bangladesh’s disaster risks, existing disaster management structures and mechanisms, and
223 the challenges facing them.
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228 Further, 20 semi-structured interviews were conducted during a 10-day fieldtrip between the
229 20th February and 1st March 2018 in Bangladesh. The interview participants included four
230 government officials, four armed forces officials, one representative of donor agencies, two
231 representatives of the United Nations (UN), five international and two local non-governmental
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239 organisations. Participants are based in Dhaka, Teknaf, Ukhia and Cox's Bazar, Bangladesh
240 and were chosen because of their involvement in emergency disaster response coordination
241 in Bangladesh. Participants signed consent forms, which guaranteed anonymity in line with
242 university regulations. The interviews were conducted on a non-attributable basis. Where
243 applicable, participants' responses are quoted directly in this article. The following guiding
244 questions were posed to the participants during the sessions: -
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249 (i) What coordination mechanisms were developed in Bangladesh disaster
250 management and coordination for humanitarian purposes and how are they
251 implemented?
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253 (ii) What kind of documents, doctrines, training and codes of conduct guide disaster
254 management and coordination?
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256 (iii) What are the challenges faced by different disaster response actors in disaster
257 coordination?
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259 (iv) What have been/should be the measures taken to address the challenges for better
260 coordination in the future?
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262 Effort was made to engage with as many relevant stakeholders as possible and reflect the
263 perspectives of different disaster management and coordination actors in Bangladesh. The
264 researchers also made a site visit to an unofficial displacement camp in Nayapara. Informal
265 conversations with several Rohingya community leaders and local Bangladeshis helped to
266 inform the writers of the nuances of the 2017 Rohingya Exodus. The lack of formal
267 engagement with aid beneficiaries or local communities hosting the displaced Rohingya
268 population is a limitation to this article.
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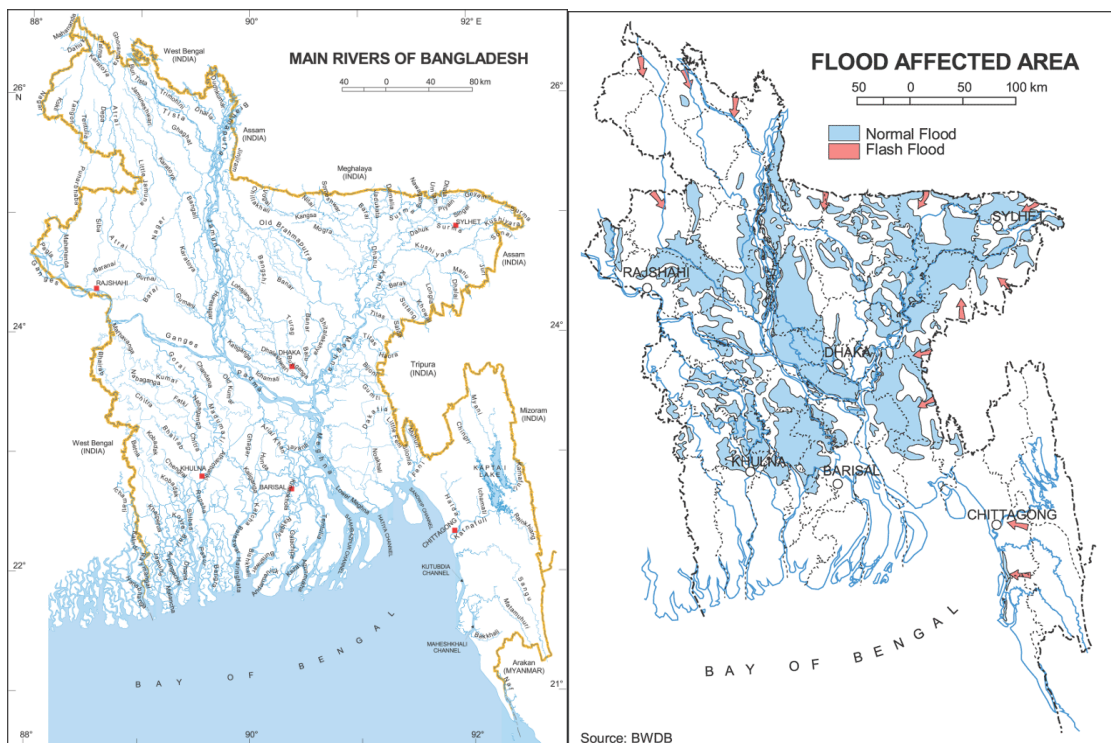
273 274 275 **3. Disaster risk context in Bangladesh** 276 277

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279 Bangladesh has three main rivers - the Ganges, the Brahmaputra/Jamuna and the Meghna,
280 which converge at the centre to become the spine of the country's network of rivers. Dhaka,
281 Bangladesh's capital city, sits in the middle of the Ganges delta. In the summer, the rivers
282 funnel icy water and silt from the melting snow of the Himalayas through Bangladesh before
283 emptying into the Bay of Bengal. Together with rainfall during the monsoon season, an
284 estimated 1,500 billion cubic meters of water flows through Bangladesh's vast river system
285 each year. Apart from the Chittagong Hill Tracts in southeastern Bangladesh, bordering India
286 and Myanmar, it is a country of flat, low-lying floodplains. Two thirds of its broad deltaic plains
287 stand just five meters above sea level.²² Heavy annual rainfall during the monsoon season
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298 from June to October expose the country to floods from overflowing rivers. Willem Van
299 Schendel notes that “it is not the amount of water that determines the harmful effects of
300 flooding ... [but] the force with which the water pushes through ... and the number of days it
301 stays on land”.²³ In a normal flood year, about 20 per cent of the country is inundated every
302 summer.
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306 However, in a year of extreme floods, up to 60 per cent of Bangladesh may be submerged.²⁴
307 When this happens, the country sees widespread damage to crops and properties in addition
308 to the loss of lives. As an example, Bangladesh was struck by two consecutive floods in April
309 and August 2017. During the flood, 32 districts in the north and central parts of Bangladesh
310 were submerged, affecting 8 million people and killing at least 140.²⁵ The floods destroyed
311 over 620,000 hectares of crops, causing government rice stocks to plunge and food prices to
312 soar by 19.4 percent.²⁶ As a result of the flood, access to affected areas were restrained by
313 damaged roads and highways. The World Bank reports that 9,000 km of roads and 457
314 bridges and culverts as well as 100km of rail lines were damaged. Such destruction continues
315 to negatively affect asset value, wage growth, livelihoods, ability to cultivate land, food and
316 water security long after flood water recedes.²⁷ This often tips the most vulnerable households
317 into chronic poverty.
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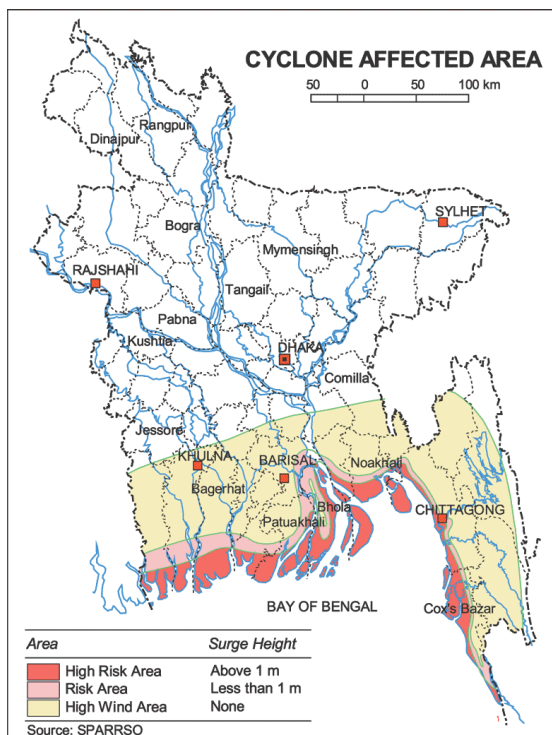
325 Figure 1: Main Rivers and Flood Affected Area in Bangladesh



349 Source: Bangladesh Water Development Board, n.d.

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 357 In the South where the country's coastline faces the Bay of Bengal, coastal communities live
 358 in the path of heavy monsoon showers and tropical cyclones from the Indian Ocean. Cyclones
 359 generally occur at the beginning of summer (April-May) and towards the end of the rainy
 360 season (October-November).²⁸ Between 1980 and 2000, the country was hit by an average of
 361 3.43 tropical cyclones a year.²⁹ During this period, Bangladesh accounted for more than 60
 362 per cent of registered deaths from tropical cyclone hazards worldwide.³⁰ Storm surge is a
 363 major cause of death and injury during a cyclone, when coastal communities are vulnerable
 364 to high winds with speeds of up to 150mph and waves as high as 20 feet.³¹ The destruction
 365 of Sunderbans, Bangladesh's natural barrier of mangroves is one reason for the exaggerated
 366 impacts felt by affected communities. Bangladesh has reduced the number of cyclone-related
 367 deaths through improvements to early warning systems, mitigation efforts such as building of
 368 embankments and cyclone shelters, development of evacuation plans, and raising awareness
 369 at the community level.³² Some of these improvements are being adapted to the Rohingya
 370 such as the Cyclone Preparedness Program, which trains volunteers on communication skills
 371 and key preparedness messages. By the end of April 2018, 16 men and 19 women had
 372 received the training in Nayapara Camp.³³

381 Figure 2: Cyclone Affected Area in Bangladesh



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

406 Still, storm surges from a cyclone leaves Bangladesh flooded for weeks with a large amount
 407 of saltwater. Floods and cyclones are Bangladesh's biggest natural disaster risks but the

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country also sits in one of the most seismically active regions in the world and has had a history of severe earthquakes.³⁴ 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.³⁵ Bangladesh is also susceptible to salinity intrusion, tornadoes, riverbank erosion, tsunamis, droughts, arsenic contamination, landslides and water logging.³⁶ 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 displaced and host communities in Cox's Bazar is the prospect of floods³⁷ and landslides³⁸, which will affect an estimated minimum of 150,000 people in the monsoon period.³⁹

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.⁴⁰ 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.⁴¹ The Rohingya 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 into the Teknaf and Ukhia 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'.⁴² 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 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.⁴³ Prior to the relocation of Rohingya around Cox's Bazar into the Kutupalong-Balukhali mega camp, many displaced persons from Rakhine took shelter in the Chittagong Hills Tracts. As a diverse region home to Bangladesh's ethnic minorities, the mass movement of the Rohingya into the Chittagong Hills Tract caused concern over ethnic balance and political stability. Bandarban government administrator Dilip Kumar Banik said in a news interview, "the government has now decided to shift all 15,000 newly

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475 arrived Rohingya to the main camp... to ensure peace in the hill district".⁴⁴ "Prime Minister
476 Sheikh Hasina forbid Rohingyas from living in the Chittagong Hill Tracts and ordered to take
477 all refugees to Cox's Bazar," the state minister for Chittagong Hill Tracts Bir Bahadur Ushwe
478 Sing has said.⁴⁵
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482 In terms of the economy, agriculture (mostly rice monoculture) is the key sector in Bangladesh,
483 accounting for nearly 20 percent of GDP and 65 percent of the labour force. Agriculture is a
484 key driver for poverty reduction in Bangladesh.⁴⁶ Although non-farm incomes have increased
485 in the last decade, about 87 percent of rural households in Bangladesh still draw some income
486 from agriculture.⁴⁷ State-driven policy reforms and strategic investments on infrastructure such
487 as irrigation expansion and road connectivity has led to the growth of agriculture productivity.
488 As the country's major food crops such as wheat, rice and maize are seasonal; stress
489 becomes acute in the event of a crop failure or a poor harvest. Floods or droughts magnify the
490 adverse seasonal consequences with irreversible effects on people's livelihoods.⁴⁸ These
491 risks to farm activities inevitably affect the food and economic security of a large portion of the
492 population in Bangladesh. Coupled with the threat of natural disasters, the local population
493 offered refuge to the large-scale influx of Rohingya from Myanmar into Bangladesh. However,
494 the impact of such a large-scale population movement made food and economic insecurity
495 more acute for both the local and displaced populations. After the mass movement of people
496 into the area, the displaced persons undercut local wage rates, as they would work for
497 cheaper. As a result, ISCG devised an incentive payment scheme, which outlines workers
498 engagement in paid projects and a flat rate of 250 BDT for a five-hour working day whether
499 the worker is from the host or displaced community.⁴⁹ In Leda camp, for example, they
500 selected 50-50 host-displaced workers, whereas in Mukti they were taking 70-30 displaced-
501 host community workers in early 2018.⁵⁰
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505 With the human insecurities faced in Bangladesh, it is also important to recognise the political
506 dynamics that have shaped these. Its history of civilian rule has been regularly punctuated by
507 military interventions into civilian politics and mutinies.⁵¹ Bangladesh has had a sustained
508 period of democratic civilian rule since 2009 until the present. Civilian control over the Armed
509 Forces of Bangladesh is vested mainly with the Prime Minister, who also holds the post of
510 Minister of Defence. The Armed Forces Division (AFD), an extension of the Prime Minister's
511 Office (PMO) is the principal organ that coordinates all operations and administrative matters
512 relating to the military.⁵² The AFD is said to have strict control over promotion, appointment
513 and firing in high-ranking military positions and advises the government on defence and
514 military affairs.⁵³
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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.⁵⁴ Yet retired military officers only make up a small fraction in the National Assembly.⁵⁵ 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.⁵⁶ 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 development and conducting military operations.⁵⁷ The Chittagong Hill Tracts is the homeland of indigenous non-Muslim peoples. The majority Muslim Rohingya from Rakhine 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 displaced population into the neighbouring district at Kutupalong camp, which is now the world's largest and most densely populated camp.⁵⁸

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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.⁵⁹ 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.⁶⁰ 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.⁶¹ 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 displaced population in the absence of local private sector capacity.⁶² An INGO participant working in the WASH sector said the military is more likely to "maintain the quality better 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.

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596 **4. Disaster Management and Coordination in Bangladesh**
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600 Disaster management in Bangladesh is characterised by its complex institutional structures,
601 as well as the number of government stakeholders for policymaking and coordination for
602 disaster management operations. The disaster management regulatory framework is provided
603 by the Disaster Management Act 2012 (DMA) and the Standing Orders on Disaster (SOD).⁶³
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605 The DMA defines a disaster as:
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608 'any such incidents mentioned below created by nature or human or created due to
609 climate change and its massiveness and devastation cause such damage...or create
610 such level of hassle to that community whose own resources, capability and efficiency
611 is not sufficient to deal with and relief and any kind of assistance is needed to deal with
612 that situation.'
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616 Of particular relevance for the Rohingya influx is its reference in the DMA under (f) that 'any
617 unnatural incident or a misfortune causing massive life loss and damage.' Unnatural incidents
618 or deaths include events such as executions, murder, acts of terrorism, and war, all of which
619 have been identified in different forums as the catalysts for the Rohingya exodus. The DMA
620 determines what disaster management activities are undertaken, and which agency is
621 responsible for them.⁶⁴ The SOD outlines disaster management arrangements and specifically
622 defines the roles and responsibilities of government ministries, departments, the armed forces,
623 national and subnational disaster management committees as well as the Red Cross/Red
624 Crescent Movement before, during and after a disaster occurs. The National Plan for Disaster
625 Management, a policy document prepared by the Ministry of Disaster Management and Relief
626 (MoDMR) offers strategic direction and implementation guidelines to the DMA and SOD.
627 Revised every five years, the plan aligns the national framework with international policy
628 drivers for disaster management. Other hazard specific disaster management plans, include
629 the Climate Change Strategy and Action Plan, Flood Action Plan and the Cyclone
630 Preparedness Program, which complement the National Plan for Disaster Management.⁶⁵
631 Collectively, these plans provide implementation guidelines to existing disaster management
632 laws and policies.
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642 The MoDMR functions as the government's focal point for operationalising disaster
643 management plans in Bangladesh. At the national and subnational levels, public office holders
644 are organised in committees to facilitate the practical implementation of disaster management
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650 policies. There are 12 disaster management committees (DMC) at the national level; each has
651 specific responsibilities ranging from reviewing disaster management systems and policies,
652 evaluating disaster preparedness, response and recovery measures, facilitating coordination
653 and approving plans for risk reduction and emergency response. At the local level, every
654 administrative district has a DMC with clear responsibilities, organised based on each phase
655 of the disaster cycle – risk reduction, emergency preparedness, emergency response and
656 recovery.
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662 In September 2013, the Bangladeshi government announced their National Strategy on
663 Undocumented Myanmar Nationals and Refugees. The government initiated a response to
664 the influx across national ministries and agencies, and allocated 2,000 acres of forestry land
665 for the establishment of a new camp to the west of Kutupalong. The MoDMR is the
666 coordinating ministry to consolidate the population in the new camp. The District Authority
667 established a mechanism for donations to direct private cash donations where it is needed
668 most. The district health complex provides urgent medical attention, while the department of
669 Public Health Engineering deployed resources to provide water in spontaneous settlements.
670 Local communities have provided the first wave response offering food and basic items to the
671 new arrivals. The Department of Immigration and Passports has implemented biometric
672 registration of the refugees with the support of UNHCR. The National Task Force (NTF),
673 chaired by the Foreign Secretary with 22 ministries and agencies monitor the national strategy
674 and oversee the influx response. At the district level, a District Task Force (DTF) monitors and
675 coordinates on the ground, led by the Deputy Commissioner and includes ministries like
676 MoHA, MDMR, MoCHTA, MoC and different line agencies like the NGO Bureau, BBS, ERD,
677 LGD and the security and intelligence agencies.⁶⁶
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687 However, some researchers note discrepancies between official disaster management
688 policies and the realities on the ground.⁶⁷ Policymaking on disaster management remains a
689 technocratic, top-down process where local level participation is limited,⁶⁸ which was
690 confirmed during fieldwork. These observations are iterated in the disaster risk governance
691 literature more broadly, which recognises that most national risk reduction policies still rely on
692 command-and-control and top-down frameworks, which pit scientific knowledge and national
693 government intervention against local action with the former in a substantively stronger
694 position.⁶⁹ Rabiul Islam and Greg Walkerden argue that policy documents and government
695 reports emphasise linking networks at the top levels of government, stressing relationships
696 between government institutions, foreign states, regional forums, international bodies and
697 foreign donors, while neglecting grassroots networks and their contribution to disaster
698 recovery.⁷⁰ In assessing the country's disaster policy, Rabiul Islam and Greg Walkerden find
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711 there was virtually no direct involvement of communities affected by climate change.⁷¹ Saidul
712 Huq finds that major hindrances to community participation in disaster management include
713 the prevailing notion that relief is the responsibility of state institutions, a lack of resources for
714 community-based programmes, and an absence of coordination forums with local
715 communities.⁷² Many local civil society organisations working with the Rohingya, however, do
716 not want to go under the umbrella of the ISCG. These organisations feel that they have already
717 been working with the Rohingya community, are coordinated by the government, and do not
718 understand why they should be coordinated by ISCG as well.⁷³ Emdad Haque and Salim
719 Uddin observe that partnerships between the Government of Bangladesh and other
720 stakeholders in disaster management “remains largely on paper”.⁷⁴ While high-level decision-
721 makers are aware of the need to institute reform, community and local government
722 engagement by the central government remains nascent. This contrasts with the RRRC, which
723 receives the majority of its funding from the international community through UN agencies.
724 While the top executives are from the government, the lower ranking and majority of staff are
725 from the project office, which receives funding from UNHCR.⁷⁵
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734 The literature also indicates that implementation of national disaster management policies at
735 the local level is uneven despite detailed directives by the SOD. Mohammad Harun assesses
736 implementation of the SOD directive at the Union level in two disaster-prone districts - the
737 Kakua and Monsurnagar Unions – and concludes that there is a mismatch of DMC capacity
738 and the scope of work assigned.⁷⁶ He finds that the Union DMC Chairmen have very poor
739 knowledge on the SOD, the phases of disaster management and are unaware of their
740 responsibilities to hold frequent meetings for disaster management planning. The Union DMCs
741 that were studied also do not have their own Contingency Plan (required by the SOD) and
742 continue to view their role as limited to facilitating post-disaster response and rehabilitation.⁷⁷
743 Tofayel Ahmed, Haruna Moroto, Saiko Sakamoto and Akiko Matsuyama come to a similar
744 conclusion on local DMCs capabilities, noting that local-level DMC members do not receive
745 formal training on disaster management nor have ready access to disaster management
746 policies and guidelines.⁷⁸ The study adds that it is unclear how or if national agencies like the
747 IDMCC or the MoDMR monitor local-level DMCs. Nor is it clear if subnational DMCs receive
748 the necessary budget allocation necessary for executing disaster management plans.⁷⁹ Whilst
749 there is clear awareness of high-level decision-makers over the need to devolve power and
750 activity to local levels, it has not gone hand-in-hand with an investment in capacity. This has
751 led to more indecision and ineffective policy implementation within the national disaster
752 management system.
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770 Since 25 August 2017, violence targeted at the Rohingya population has led to the exodus of
771 671,000 people from Myanmar to Bangladesh. Local communities were still recovering from
772 the impact of Cyclone Mora that hit the district in May 2017 when the first arrivals of Rohingya
773 appeared at the end of August 2017. The Cox's Bazar district is an area exposed to pre-
774 monsoon cyclones from April to May and monsoon rains from October to November annually.
775 Many of the arrivals are women and unaccompanied children who were physically injured and
776 deeply traumatised, having lost their homes and family members. At least 58 percent of
777 Rohingya are children. Prior to this influx, Bangladesh was already hosting 303,070 Rohingya
778 or what the Government of Bangladesh refers to as "forcibly displaced Myanmar Nationals" in
779 unofficial settlements in the upazilas of Teknaf and Ukhia in Cox's Bazar. This is in addition to
780 the 34,000 Rohingya officially recognised as refugees living in two camps managed by
781 UNHCR in Nayapara and Kutupalong. The Rohingya population occupies a sprawling
782 complex of shelters built with bamboo and plastic sheets on 4,800 acres of reserve forestland
783 in Cox's Bazar allocated by the Government of Bangladesh. Many living within the camps are
784 still in need of urgent life-saving assistance.
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793 At the time of writing, the humanitarian community is still operating in the emergency response
794 phase. Arrivals from Myanmar have slowed but have not stopped. The governments of
795 Bangladesh and Myanmar have signed a Memorandum of Understanding on 23 November
796 2017 for the "safe, voluntary and dignified" repatriation of displaced Rohingya population to
797 Myanmar. The deal was reached without the involvement of the international community and
798 its operationalisation is unclear. However, references to the United Nations and its agencies
799 were included along with a commitment to international law. In February 2017, Bangladesh
800 handed a list of 8,032 "eligible returnees" to the Burmese government for repatriation but it
801 was reported that Myanmar was willing to accept less than 400 Rohingya on the list.⁸⁰
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807 The Cox's Bazar district is vulnerable to natural hazards like the pre-monsoon cyclone season
808 (April-June) and monsoon rains (October-November). The Rohingya population is expected
809 to be particularly exposed to heavy wind, flooding and landslides. The Government of
810 Bangladesh and the humanitarian community are cooperating to implement disaster
811 preparedness activities for the local and displaced populations. In March 2017, the
812 humanitarian community led by the ISCG and the Strategic Executive Group worked with the
813 Government to draw up a Joint Response Plan (JRP) that requests US\$951 million to support
814 humanitarian assistance including food, water, sanitation, shelter and medical care to 1.3
815 million Rohingya and local host communities for the period of March-December 2018.⁸¹
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821 One of the greatest challenges to disaster management in Bangladesh is the sheer number
822 of agencies and mandates, which increases the likelihood of overlap and ineffectiveness. The
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829 table below outlines the fourteen bodies that govern or advise key decision-makers on natural
830 disaster management in Bangladesh. Much of the capacity remains at the top echelons of
831 society in the bureaucracy and with politicians, while local government and communities are
832 left behind. This broadly reflects observations elsewhere that local knowledge does not receive
833 due consideration in disaster governance and oftentimes goes completely unheard, whereas
834 top-down command-and-control structures remain dominant. This is even considering the
835 repeated problems with command-and-control structures being illustrated in the literature over
836 the longer-term.⁸² This compares to the Office of the Refugee Relief and Rehabilitation
837 Commission (RRRC) also reflected below, which was established to govern the Rohingya
838 refugees who fled into Bangladesh in the early 1990s. The Commission office is located within
839 the Ministry of Disaster Management and Relief (MoDMR) but 'out-posted' to Cox's Bazar.
840 Initially, the RRRC was tasked with overseeing the 34,000 registered refugees only. Since the
841 most recent influx from 25 August 2017 onwards, the RRRC now oversees the entire refugee
842 population. The precursor ministry to MoDMR⁸³ was the largest recipient of financial support
843 from the UNHCR, with allocations reaching 20 percent of the UNHCR's operational budget in
844 2011. The UNHCR paid mission allowances to MFDM personnel seconded to the RRRC office
845 in Cox's Bazar as well as the salaries of some 130 RRRC personnel hired locally in the Cox's
846 Bazar area. As a result of international financial support, the capacity at a more localised level
847 with the RRRC is greater than at the local level within the disaster management structure
848 overseeing natural hazards. However, the greatest challenge is how these two structures work
849 together when natural disaster affects the Cox's Bazar area, particularly since the most recent
850 exodus of Rohingya into Bangladesh.

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

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873 The PMO directive issued in mid-September framed the emergency response to the Rohingya
874 influxes in 2017. It created an ad hoc and centralised disaster management coordination
875 structure for responding to displaced Rohingya that runs parallel to what responds to natural
876 disasters like floods and cyclones. With that, the RRRC took over relief coordination and
877 authorises site-management and planning for refugee settlements. Correspondingly, the DC
878 and HCTT will serve the local Bangladeshi population. It is unclear how the two coordination
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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, those skills are being shared with the refugees tasked with saving others in emergency events.⁸⁴

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		

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		routes, disaster shelters, etc.), and relief and rehabilitation activities.		
	Committee for Speedy Dissemination of Disaster-Related Warning/Signals (CSDWS)	Headed by the Director General of DMB to examine, ensure, and find ways and means for rapid dissemination of warnings to the 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 (DMTAF)	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	Headed by the Chairman of the Union Parishad to coordinate, review, and		

Committee (UDMC)	implement disaster management activities in its particular union.		
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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 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] ... 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.”⁸⁵

Participants described the operating environment during the first days of the influx as “chaos”, “simply crazy”, “dirty and nasty” and “disorganised”. Rohingya 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 towards existing unofficial settlements in Kutupalong by broadcasting announcements through loud speakers.⁸⁶ 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.⁸⁷ 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.”⁸⁸

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;⁸⁹ (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

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1065 required to appoint a focal point officer for coordination; (iv) the building of 14 temporary
1066 warehouses by the WFP; (v) the AFD to manage and transport incoming relief materials at
1067 airports to Cox’s Bazar; (vi) for the DC to receive and manage the distribution of relief items;
1068 (vii) and line ministries to coordinate with other stakeholders for the provision and construction
1069 services like healthcare and sanitation facilities.
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1073 In the initial phase of the response, the RRRC led the Site Planning Taskforce for the
1074 development of the Kutupalong Expansion site on 2,000 acres of undeveloped forest land
1075 allocated by the Government of Bangladesh with implementing agencies like the IOM and
1076 UNHCR. The site was subsequently expanded to become the Kutupalong-Balukhali mega
1077 camp. Refugee settlements were organised in blocks/zones, with military focal points
1078 appointed for each block.⁹⁰ Later, RRRC shifted the administration boundaries from zones to
1079 camps and appointed a Camp in Charge (CiC) to lead the administration and coordination of
1080 each camp and are supported by site managers from humanitarian organisations.⁹¹ In October
1081 2017, 20 CiCs were deployed on short term rotations. The number is expected to rise to 30
1082 CiCs covering 30 locations, out of which 23 are located within the mega camp.⁹² Other sites
1083 with more dispersed settings will be looked after by sectoral humanitarian agencies.
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1090 The civilian government is also directly involved with coordinating sector-based service
1091 delivery to the refugee population within refugee settlements. On the premise of ensuring
1092 effective aid delivery and identifying protection needs, the RRRC and UNHCR initiated a family
1093 counting exercise to determine refugee numbers, needs and vulnerabilities. Those who are
1094 registered are issued a card and an identifier number, although a government official
1095 interviewed said that registration is not a prerequisite to receiving aid.⁹³ Inter-sector meetings
1096 are held weekly and are attended by sector coordinators/leads to ensure coordination not only
1097 within but also between sectors and government representatives. Stakeholders described
1098 RRRC’s work as creating an “enabling environment for life-saving interventions”.⁹⁴ Its role as
1099 a “bridge between the government and the [other] actors”⁹⁵ was cited as useful for obtaining
1100 government approvals for and overseeing implementation of technical interventions.
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1107 One INGO representative said:

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1109 “With RRRC, we are getting very great support from the beginning when we
1110 explain the issues [we face] ... For example, there was a water emergency in
1111 Teknaf in the dry season [that is] ongoing. We discussed [this] with RRRC and
1112 RRRC helped us to expand the intervention to provide safe water. When we
1113 came up with the unified sanitation technology design ... [we received] approval
1114 of DPHE with the help of RRRC.”⁹⁶
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1118 A government official said:
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1124 “The NGO Affairs Bureau normally issues the FD7 or FD6. They issue this
1125 letter, approve the FD7 and FD6 and that letter goes to [the] DC for supervision
1126 of works of that particular NGO. That is common all over Bangladesh. But, here
1127 it is different. In the camp area, the district commissioner does not have any
1128 network. The network is under RRRC ... DC sends all the FD7 to [the RRRC]
1129 office to take necessary action.”⁹⁷
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1134 However, some noted that despite RRRC’s “flexibility”, there are limitations to its capacity as
1135 a district-level administrator. One participant from the donor community said that approvals for
1136 relief programs are “held up at the central level”.⁹⁸ Most of the non-state actors interviewed
1137 said that there are delays in obtaining FD7 approvals, which does not fall under the jurisdiction
1138 of the RRRC or MoDMR leading to a delay in program implementation.
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1142 **4.2 The role of the Bangladesh Armed Forces**

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1144 Within the DMA and the SOD, the military occupies a space equal to that of its civilian
1145 counterparts. The Chiefs of Staff of the Army, Navy and Air Force sit at the apex as policy
1146 makers on the NDMC, reviewing national systems and giving strategic advice on disaster
1147 management. At the inter-ministerial IDMCC, the Principal Staff Officer from AFD oversees
1148 the implementation of disaster risk reduction and emergency response management with its
1149 civilian colleagues.⁹⁹ The AFD is responsible for coordinating the employment of the armed
1150 forces in disaster management and overall relief operations.
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1154 According to the SOD, the military shoulders a significant portion of critical tasks as primary
1155 responders during the disaster response stage - emergency evacuation, search and rescue,
1156 removal of dead bodies and debris, provide medical services, temporary shelter, damage, loss
1157 and needs assessments, transport, distribution of relief goods and logistics.¹⁰⁰ The military has
1158 a presence throughout the country and are able to respond quicker and on a larger scale than
1159 civilian actors can. The military is officially involved in disaster response, relief and
1160 rehabilitation in “aid to the civil power” at the request of the government. In practice, however,
1161 the armed forces may take a lead role. In the Disaster Response Exercise and Exchange
1162 (DREE), an annual simulation exercise for responding to an earthquake, the AFD leads civil-
1163 military and military-military coordination. All participants said the decision to deploy the armed
1164 forces in response to the most recent Rohingya influx was critical to bringing “the situation
1165 under control”. At the time of the interviews, there were 17,000 military personnel stationed in
1166 Cox’s Bazar.
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1183 An AFD representative is stationed at the coordination centre in Ukhia, directing incoming aid
1184 that comes through the district administration to different camps. The government established
1185 distribution points to curb ad hoc activities by spontaneous local volunteer groups. Participants
1186 felt that the military brought order and discipline to actors. On camp sites where there are no
1187 CiCs¹⁰¹ appointed, the Bangladeshi Army is responsible for daily administration - assisting with
1188 biometric registration of Rohingya refugees, managing disputes between the Rohingya and
1189 local populations, attending coordination meetings with other stakeholders and directing new
1190 arrivals to RRRC for biometric registration. INGO participants said that the military were helpful
1191 in site selection for technical interventions such as the construction of a sludge treatment plant
1192 and health posts when finding adequate space is difficult in congested camps.
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1199 Further, Bangladesh is the second largest contributor to UN peacekeeping personnel
1200 globally.¹⁰² Their involvement with international peacekeeping operations hints at the
1201 Bangladesh military's capabilities in responding to conflict-induced emergencies in addition to
1202 those caused by natural hazards.¹⁰³ Rashed Uz Zaman and Niloy Ranjan Biswas find that
1203 interaction with other peacekeepers enhances operational competency, normalises values
1204 such as consent, impartiality, non-use of force except in self-defence, and the concept of
1205 civilian control over the military, among Bangladeshi soldiers and officers.¹⁰⁴ Some studies
1206 raise questions about the quality of the military participating in disaster management and
1207 emergency response. Kabilan Krishnasamy notes, for instance, that Bangladeshi soldiers
1208 have been removed from peacekeeping missions for lack of discipline.¹⁰⁵
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1214 However, the existing literature has generally neglected to examine the role of the Bangladesh
1215 armed forces as a disaster manager, coordinator and responder. Critical questions, including
1216 the military's relationship with civilian actors, its interaction with and perception of affected
1217 communities, the integration and application of humanitarian operations in military decision-
1218 making and operational frameworks, effectiveness of civil-military and military-military
1219 coordination frameworks to effectively deliver assistance, are unanswered.
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1226 **4.3 The role of non-state actors**

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1229 Outside the state apparatus, disaster management work operates through a vast network of
1230 international development donors, United Nations agencies, local and international NGOs.
1231 Bangladesh is the sixth largest recipient of overseas development assistance in Asia,
1232 receiving US\$2.57 billion in 2015.¹⁰⁶ Multilateral organisations and NGOs are the main
1233 channel of delivery of humanitarian aid in Bangladesh.¹⁰⁷ Various international and local
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1242 humanitarian NGOs organise themselves through various coalitions, consortia and networks.
1243 For instance, the National Alliance for Risk Reduction and Response Initiatives (NARRI)
1244 Consortium, and the Bangladesh Developing and Strengthening Humanitarian Assistance and
1245 Risk Reduction Initiatives (DeSHARI) are two coalitions of international humanitarian NGOs.
1246 These consortia coordinate humanitarian interventions through information sharing and
1247 standardisation of disaster response packages to affected communities. The government
1248 retains oversight of NGO disaster-related activities through the NGO Affairs Bureau. NGOs
1249 are required to submit project proposals in a form called FD-6 to the NGO Affairs Bureau,
1250 detailing the project rationale, objectives, and source of funding. FD-6 submissions are
1251 approved within 45 days. During an emergency, the NGO Affairs Bureau approves NGO
1252 proposals (mainly distribution of relief materials) based on a form called FD-7 within 24 hours.
1253 The FD-6 and FD-7 approvals are required to release funds and appoint foreign staff or
1254 consultants for project implementation.¹⁰⁸
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1262 Humanitarian agencies have scaled up their operations in Cox’s Bazar since the first arrivals
1263 of Rohingya in 2017. Despite the early chaos, all stakeholders interviewed identified ISCG
1264 hosted by IOM and UNHCR, as the body responsible for coordinating humanitarian agencies
1265 for the response to the Rohingya Exodus. They also recognised that it was a “positive
1266 advantage” that the ISCG was in place before the 2017 exodus. Sector agencies leveraged
1267 pre-established relationships with counterparts in government to plan for a quick onset
1268 disaster long before the central government’s approvals for relief programs came through.
1269 Despite that, some participants said that it became clear that an IOM-led response lacked the
1270 technical expertise for humanitarian coordination offered by United Nations Office for the
1271 Coordination of Humanitarian Affairs (UN OCHA) and refugee protection offered by UNHCR
1272 needed for a Level 3 emergency. This meant that the internationally mandated agency for
1273 humanitarian coordination was not utilised and a negotiated structure was in place, and
1274 highlighted the importance of the well-established pre-existing relationship IOM has with the
1275 government. This underlines the importance of inter-personal relationships in establishing
1276 humanitarian access to populations of concern over-and-above official mandates.
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1286 The ISCG structure was modified to meet the demands of the 2017 Rohingya Exodus. The
1287 UNHCR’s mandate was expanded to cover unregistered Rohingya. The ISCG is now led by a
1288 Senior Coordinator who reports to the co-chairs of the Strategic Executive Group (SEG) – the
1289 IOM Chief of Mission, the UN Resident Coordinator and UNHCR representative. The Senior
1290 Coordinator also chairs the Heads of Sub-Office Group, which brings together all the heads of
1291 UN agencies and representatives of INGOs, NGOs and the donor community based in Cox’s
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1301 Bazar. The ISCG Secretariat is supported by the External Relations Unit, Analysis and
1302 Planning Unit, Situation Unit and Coordination Unit. The ISCG has 10 sectors, mirroring the
1303 national clusters, led by INGOs/UN agencies and government line ministries for service
1304 provision. There are eight working groups to support the ISCG, which have a culture of
1305 information sharing. Apart from weekly coordination meetings within and between sectors,
1306 sector-level plans, meeting minutes, sector progress reports, joint needs assessments and
1307 contact details of focal points are accessible through a public online platform. An ISCG
1308 situation report collating every sector's needs, response, operational gaps and constraints as
1309 well as coordination developments are published bi-weekly. In addition, a '4W' (Who does
1310 What, Where, When) is published periodically to map the implementation actors and
1311 humanitarian activities in each camp.¹⁰⁹
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1318 There are still reservations with the new structure, however. An INGO Humanitarian Advisor
1319 with the UN said that even with the new SEG-led ISCG structure, the humanitarian "operation
1320 is a little bit compromised" because of the absence of an OCHA-led coordination approach:
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1323 "What coordination structure [is there] in Bangladesh and Cox's Bazar? ...
1324 OCHA was initially here for six months but now the operation has been shut
1325 down, handed over to the IOM. OCHA came here [and was] working under the
1326 coordination of IOM because the government wanted that."¹¹⁰
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1329 "When they had the transition, everything they compromised ... OCHA
1330 approach, coordination is not followed here ... [UNHCR], their expertise is on
1331 refugees. Now, we are talking about the host communities [too]. Government
1332 is saying that the host communities have been deprived, could be clear tension
1333 between host communities and refugees."¹¹¹
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1340 Operationally, different humanitarian agencies are expected to coordinate. A representative
1341 from the donor community said, "Whether it is the mandated agency or UNHCR or OCHA, at
1342 the end of the day, six months on, people accepted this structure and we have the right
1343 system". Based on the Joint Response Plan, the response to the 2017 Rohingya Exodus
1344 brings together over 130 humanitarian organisations (13 local, 45 national and 69 INGOs).
1345 Most of them work in partnerships with UN agencies and respond based on ISCG's sector-
1346 based coordination. The domination of UN agencies and a handful of INGOs in the ISCG was
1347 noted by several participants. A limited number of Bangladeshi organisations work as co-lead
1348 coordinators in ISCG sectors. Meanwhile, INGO and NGOs operating at the national level are
1349 exploring better ways of coordinating their response in Cox's Bazar and to complement the
1350 ISCG-led efforts. A participant said that the INGO Emergency Subcommittee in Dhaka is
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planning to decentralise INGO coordination to the district level and form a group called “NGO Platform” to coordinate NGO activities, and feed information into and raise issues to the ISCG and district administration.¹¹² 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.¹¹³ 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.¹¹⁴ 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.¹¹⁵ 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 headquarters, and has limited access to resources and authority.¹¹⁶ 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.¹¹⁷

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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.¹¹⁸ 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.¹¹⁹

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.¹²⁰ 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:

“Most of them, all the families listen to the Majhis. All the problems they are facing, they come to the Majhi.”¹²¹

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.

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1481 **5. Challenges in the Humanitarian Response to the Rohingya Exodus**
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1484 Bangladesh had hosted the recent arrivals of Rohingya for six months at the time of the
1485 fieldwork. Although stakeholders acknowledge that there are still gaps to the emergency
1486 response, many indicated that “things are settled down” and that “more or less, coordination
1487 is in place”. As the monsoon season begins, Bangladesh’s disaster preparedness and
1488 capacity to cope with a complex and protracted crisis will be tested again. In this section, we
1489 provide an analysis on the emergency response thus far based on the main themes identified
1490 during the interviews. They are (i) operational constraints; (ii) coordination; (iii) accountability;
1491 and (iv) localization.
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1498 **5.1 Operational constraints**
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1501 The first operational constraint facing humanitarian actors in Bangladesh is the host
1502 government policy on refugees. Although borders are kept open, the Government is clear that
1503 the displaced Rohingya population should be repatriated to Myanmar and that Bangladesh is
1504 unprepared to host the displaced population over the “mid-term or long-term”. During the 2017
1505 Rohingya Exodus, the Government refrained from declaring an emergency or formally
1506 requesting international assistance. It has, however, accepted bilateral assistance. Traditional
1507 donors in Bangladesh such as the UK’s Department for International Development (DFID),
1508 United States Agency for International Development (USAID) and The Directorate-General for
1509 European Civil Protection and Humanitarian Aid Operations¹²² have supported the emergency
1510 response mainly through the funding of humanitarian actors. Countries without in-country
1511 development agencies like Malaysia, Singapore and Turkey have bilaterally provided relief.
1512 There is an awareness among participants that future assistance is not guaranteed without
1513 the Government indicating its long-term commitment to host the Rohingya or a formal request
1514 for more aid. A representative from the donor community said, “When the Government’s public
1515 line is that the Rohingya are not staying here for long, it gives us very little space for
1516 sustainable activities.”¹²³
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1525 The JRP appeal for US\$951 million, if fully met, will secure funding to serve the displaced and
1526 host populations until December 2018. But, with no timeline for the repatriation of Rohingya to
1527 Myanmar, many humanitarian agencies are unable to commit resources for sustainable
1528 interventions beyond the end of 2018 and unable to formulate an exit strategy. A Dhaka-based
1529 INGO representative said:
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1537 “If you don’t have a good, long-term vision or strategy in place, it is difficult to
1538 plan. Each and every day the situation is changing. Sometimes, we hear that
1539 the repatriation will start and then we may have to plan for a quick pull out.
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1541 Then, you see, it may not happen.”¹²⁴
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1544 Meanwhile, the Rohingya population is confined to one mega camp and several smaller sites,
1545 with restrictions to mobility and access to formal job markets and education, hampering
1546 prospects of self-reliance. A second operational constraint highlighted was that the physical
1547 environment and conditions in refugee settlements pose serious limitations on disaster
1548 preparedness against further shocks such as the monsoon season in April. On that, one INGO
1549 representative said, “I am more prepared to die in Yemen than to respond to the monsoon
1550 season” and another called it a looming “massacre”.¹²⁵ All participants singled out the shortage
1551 of suitable land as a key problem and decongestion of settlements as priority for disaster
1552 preparedness. Most of the Rohingya refugees are living on forest land and degraded hill
1553 slopes in structurally weak shelters that do not meet core humanitarian standards. There are
1554 almost no drainage systems in the congested camps and sanitation facilities are regularly built
1555 close to water sources, raising the specter of a public health crisis. Allocation of new land by
1556 the Government would require extensive development before it is habitable and would likely
1557 come at the cost of Bangladesh’s depleting forest resources. The JRP stated that more than
1558 200,000 refugees reside in areas that will certainly flood or collapse with the rainy season.¹²⁶
1559 Structural works being carried out to reinforce hill slopes. The decommissioning of
1560 dysfunctional latrines and the construction of drainage systems are underway. There are also
1561 plans to relocate those most exposed to natural hazards though many have refused to move
1562 because of the concentration of services at present locations. Whatever scarce community
1563 spaces are available, such as learning centres, will likely become common shelters during the
1564 rainy season. A participant summarized the situation bleakly:
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1575 “There are acceptable risks and unacceptable risks. You can only treat the
1576 unacceptable risk. The shelters that are constructed, they are acceptable risks.
1577 You need to accept the risk. When you accept the risk, there are very few things
1578 you can do to change it. You cannot shift the whole community to somewhere
1579 else. If you want to minimize the risk, you have to keep it as it is but that is very
1580 difficult.”¹²⁷
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1584 Participants emphasized a third operational constraint being the scale of impact of a protracted
1585 refugee crisis on the host community and the need to support them. The number of Rohingya
1586 doubles that of local Bangladeshis in Teknaf and Ukhia. This has led to an inflation in the price
1587 of goods and services and the suppression of daily wage rates. The sudden surge in
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1596 population has put public services such as healthcare under strain and increased competition
1597 for local resources such as potable water and fuelwood. As a result, this generates conflict-
1598 sensitive interventions by humanitarian agencies and included in the JRP. Some humanitarian
1599 agencies have introduced work programs as mentioned earlier that require the equal
1600 participation of local and Rohingya workers with an equal wage rate. As the crisis prolongs,
1601 however, the overlapping of long-term support for the refugee and host population may not fit
1602 conventional donor funding modalities, which differentiate between humanitarian and
1603 development assistance. This is an important bridge to cross and develop co-deployment of
1604 humanitarian and development actors into the field in an attempt to ensure that the needs of
1605 the displaced and local communities are met.
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1611 **5.2 Coordination**

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1615 Several procedural and operational gaps were uncovered when operationalising the PMO
1616 directive. There is a need for greater preparedness for a complex emergency in Bangladesh.
1617 At present there is an absence of policies and processes that would facilitate an
1618 internationalised emergency response. For instance, one participant reported that there was
1619 a lack of clarity on how relief materials coming through the country's airports would be
1620 managed. The Bangladesh Armed Forces was tasked to receive and release incoming goods
1621 but understood its responsibility as limited to managing goods coming into airports at
1622 Chittagong and Cox's Bazar when humanitarian actors expected the military jurisdiction to
1623 extend to the airport in Dhaka. A formalised mechanism for constant civil-military coordination
1624 appears to be missing on the ground too. Representatives of the military attend coordination
1625 and taskforce meetings but participants were quick to point out that it does not have "any
1626 regular activities" or "take decisions" at these meetings.¹²⁸ The ISCG sector coordinators
1627 communicate with military officials in camps through the ISCG civil-military coordinator. Yet,
1628 at the time of writing, the position of civil-military coordinator has been removed from the ISCG
1629 focal points list after being vacant for months.
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1637 Another gap that was cited as "delaying the process, hindering the operations" was the
1638 absence of procedures for processing visa and FD7 applications for international humanitarian
1639 staff and organisations intending to respond to a quick onset disaster.¹²⁹ In the response to
1640 the 2017 Rohingya Exodus, humanitarian actors said FD7 clearances can take anywhere
1641 between 72 hours to two months. In some sectors such as the Education and Protection
1642 Sectors, the lack of FD7 approvals continue to hold back available funds, hinder the
1643 deployment of new actors and the expansion of programs by existing actors. Visa application
1644 procedures are particularly cumbersome for surge capacity staff who need to enter
1645 Bangladesh urgently. Many enter with a tourist visa that are valid for four weeks. In June 2018,
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1655 the Prime Minister announced that the government is now proceeding cautiously to issue a
1656 special category of visa for relief workers. The government remains suspicious of relief
1657 workers, as allegedly many foreign nationals enter Bangladesh under the guise of relief
1658 workers, which “may lead to child and women trafficking, sexual abuse, terrorism and many
1659 other social problems.”¹³⁰ Bangladeshi law enforcement officers have also regularly stopped
1660 and sometimes arrested international staff who do not have the correct visa or do not carry
1661 identification documents.
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1666 Effective coordination between different actors in this emergency response is made more
1667 challenging with the high turnover rate of humanitarian staff, military officials and government
1668 appointees such as the CiCs. Humanitarian agencies mobilised surge capacity, drawing
1669 technical experts and field support teams to facilitate the coordination and planning for the
1670 emergency response in the first six months of the crisis. Surge teams operate on short-term
1671 rotations of four to six weeks. An ISCG sector coordinator said that said during the interview:
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1675 “At the beginning of this crisis, 50 percent of the international staff I used to
1676 deal with, a maximum of 10 percent are left. These are the international
1677 humanitarian responders ... We are dealing with the seventh health sector
1678 coordinator, fifth site-management coordinator ... We can survive with the third
1679 round of turnover but after that it is too much ... To coordinate the response,
1680 you have to start all over again.”¹³¹
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1685 Meanwhile, military officials and CiCs appointed by the Ministry of Public Administration are
1686 deployed to the camps on short rotations of two to three months at a time. It is understood that
1687 the RRRC has requested the Government for the appointment of CiCs for a longer rotation
1688 period of six months but has only been assured that CiCs will serve 3-month stints at a time.
1689 This discontinuity is part of the “humanitarian business” and often disrupts trust building
1690 between coordinators. It can, however, be addressed with smooth handovers and the
1691 localisation of coordination roles.
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1703 There is agreement among non-state stakeholders who were interviewed that accountability
1704 of service providers to beneficiaries is an issue that requires attention. The operational
1705 contradiction between delivering interventions to save lives and to respond to the displaced
1706 Rohingya population with respect and dignity were apparent during the crisis. Non-traditional
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1714 actors such as spontaneous voluntary groups, the private sector or faith-based groups were
1715 singled out for this. Participants said it was commonplace at the beginning of the crisis for non-
1716 traditional actors such as these to indiscriminately distribute cash or throw relief items off
1717 vehicles at beneficiaries along the roadsides.¹³² By implication, much of this relief goes to
1718 people standing on roadsides regardless of benefit and without the obligations to answer for
1719 the effectiveness of the interventions.
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1724 However, even within a more controlled or coordinated disaster management environment
1725 occupied by experienced humanitarian agencies and implementation partners, it was
1726 observed that quality of interventions was compromised to reach a greater number of
1727 beneficiaries. It was not unusual, for instance, for the ISCG WASH coordination unit to find
1728 that hand pumps and latrines were installed incorrectly, in locations which were not accessible
1729 to the population in need or did not comply to minimum standards. This was attributed to the
1730 overstretched capacity of many actors and the lack of intervention monitoring. Installations
1731 that do not meet minimum standards often fall into disrepair, require maintenance or have to
1732 be decommissioned, adding on to the responsibilities of other organisations.
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1738 A second facet of accountability that was raised during the interviews was that of the
1739 coordination mechanisms for humanitarian organisations used in the 2017 Rohingya Exodus.
1740 The ISCG Secretariat is the main coordinator of the emergency response but participants
1741 pointed out that response coordination and implementation responsibilities are devolved to
1742 sector coordinators. The ISCG Secretariat is answerable to the SEG, but is removed from
1743 accountability processes that answer to aid beneficiaries. Some are unsettled by the “delusion
1744 of accountability” created by how the ISCG is being branded like an organisation of its own.
1745 For example, email addresses of the members of ISCG Secretariat do not bear the name of
1746 the officer or the organisation he/she is affiliated to. Instead, it has the ISCG domain name.
1747 On one hand, this suggests that officers assigned to the ISCG Secretariat do not represent or
1748 advance the interests of any single agency but on the other it creates a transparency gap
1749 when beneficiaries cannot trace decisions to a specific organisation. The sustainability of the
1750 ISCG Secretariat is also in question. Participants highlighted a need to consider a coordination
1751 structure that would be able to run without current levels of funding.
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1763 **5.4 Localisation**

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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.”¹³³

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

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1832 national NGOs to lead humanitarian interventions.¹³⁴ As international aid for the 2017
1833 Rohingya Exodus response tapers or moves out from the emergency response phase,
1834 international actors, which have dominated coordination and decision-making structures, have
1835 to make strategic decisions about the extent of their own participation in the humanitarian
1836 response. Bangladeshi disaster management actors are imperative to a sustainable response.
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1838 As was seen in the humanitarian response to Super-Typhoon Haiyan in the Philippines, the
1839 government instituted reforms that saw local governments take the lead in disaster
1840 response.¹³⁵ This shift was present two years later when there was a local government-led
1841 humanitarian response to Typhoon Hagupit.
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1846 There is danger, however, in engaging in a conversation about localisation without evidence-
1847 based assessments on how local and international humanitarian actors can complement each
1848 other in a particular context. The localisation agenda should not be cast as a one-dimensional
1849 referendum on the capacity of Bangladeshi humanitarian organisations. Developing a locally-
1850 led disaster management philosophy should not mean local organisations mimicking
1851 international ones. Affected communities are best served when the comparative advantages
1852 of all actors – local or international – are maximised. For Bangladeshi humanitarian actors, it
1853 is important to explore how it can develop and leverage local capacities and harness
1854 complementarities with government institutions and other actors. The Red Cross/Red
1855 Crescent movement provides a useful example of how local actors can tap onto international
1856 support for a locally-led disaster response approach. One donor suggests that this would
1857 include local and national organisations differentiating itself by developing a geographical or
1858 operational niche, using local knowledge to contribute to policy making, empowering local staff
1859 with competitive pay packages, and shedding the overemphasis of securing funding.
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1872 **6. Conclusion**

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1876 The analysis presented in this article suggests that the well-established disaster management
1877 structure in Bangladesh that was successful in managing natural disasters, specifically for
1878 floods and cyclones, has been tested in the ongoing humanitarian response to the Rohingya
1879 Exodus. While acknowledging that Bangladeshi state institutions, the Bangladesh Armed
1880 Forces and the robust civil society have the capacity to mobilise swiftly for an emergency
1881 response, there was little in the way of formally articulated policy for responding to the
1882 movement of displaced people, let alone preparedness for coordinating an emergency the
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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 article identifies implications arising out of Bangladesh's response to the 2017 Rohingya Exodus.

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 displaced persons, 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, and draw on much earlier works on "shared governance".¹³⁶ 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. This will assist in the transition from a single disaster orientation to complex emergencies through the development of disaster governance in Bangladesh away from a linear, juxtaposed top-down versus bottom-up structure towards a system that reflects the multiple actors involved across different levels of governance.

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. 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

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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 governance. 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 at an operational level. 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. Investing in these linkages would further develop “shared governance” in Bangladesh. 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. This, in turn, will push disaster governance towards ‘shared’ and ‘net-centric’ governance. At an operational level, 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

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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 continue the transition of disaster governance towards a 'shared governance' space that governs complex humanitarian emergencies, Bangladesh is well-placed to become a global leader in this field.

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- ¹¹⁹ See Emdad Haque et al, "Disaster Management and Public Policies in Bangladesh: Institutional Partnerships in Cyclone Hazards Mitigation and Response", 2012, pp.170-171
- ¹²⁰ 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
- ¹²¹ Interview with official of the Bangladesh Armed Forces, Nayapara Camp, Teknaf, Bangladesh on 23 February 2018
- ¹²² 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.
- ¹²³ Interview with representative of the Department for International Development, Baridhara, Dhaka, Bangladesh on 26 February 2018
- ¹²⁴ Interview with a representative of Save the Children, Gulshan 2, Dhaka, Bangladesh on 27 February 2018
- ¹²⁵ Interview with representative of the ISCG WASH Sector Coordination Unit, Cox's Bazar, Bangladesh, 25 February 2018
- ¹²⁶ "Joint Response Plan for Rohingya Humanitarian Crisis March-December 2018", p. 13.
- ¹²⁷ Interview with Head of Humanitarian Programmes at Islamic Relief Bangladesh, Baridhara, Dhaka, Bangladesh, 28 February 2018
- ¹²⁸ Interview with Deputy Secretary at the RRRC, Cox's Bazar, Bangladesh, 22 February 2018
- ¹²⁹ Interview with Humanitarian Affairs Specialist at the UN Resident Coordinator's Office, Dhaka, Bangladesh, 27 February 2018
- ¹³⁰ 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/>

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¹³¹ Interview with representative of the ISCG WASH Sector Coordination Unit, Cox's Bazar, Bangladesh, 25 February 2018

¹³² 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,

¹³³ Interview with a representative of Mukti Cox's Bazar, Cox's Bazar, Bangladesh on 25 February 2018

¹³⁴ 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.

¹³⁵ Julius Trajano, 'Building Resilience from Within: Enhancing Humanitarian Civil-Military Coordination in Post-Haiyan Philippines', NTS Report No. 6, December 2016.

¹³⁶ Dynes, Russell R., 'Community Emergency Planning: False Assumptions and Inappropriate Analogies', Preliminary Paper #145, 1990, University of Delaware Disaster Research Center.