

WHEN OVERSIGHT FAILS

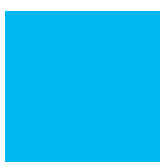
PROCUREMENT FRAUD AND RIGHTS-BASED HARM IN HUMANITARIAN SYSTEMS UNDER PRESSURE

Author

Lannie Su

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Muenchendorfer Str. 2 2361
Laxenburg
Austria.

+43 (0)2236 710 718 100
www.iaca.int
mail@iaca.int

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Abstract

Procurement fraud in humanitarian operations is often framed as a financial or compliance issue, but it can also cause direct harm to affected communities by undermining the safety, quality, and effectiveness of aid delivery. Against the backdrop of shrinking aid budgets and rising conflict in 2025, this paper argues that weakened procurement oversight increases the risk of rights-based harm. It advances the position that procurement fraud should be understood not only as a compliance concern but also as a threat to humanitarian protection.

The paper draws on qualitative research combining a desk review of publicly available information on recent humanitarian funding contractions with 17 anonymized practitioner interviews across investigations, procurement, logistics, and compliance functions in international humanitarian organizations. Interview data were thematically coded to identify recurring weaknesses in procurement oversight and fraud controls, particularly in emergency contexts where speed and operational pressure often override established safeguards. Field-based examples illustrate how these weaknesses manifest in practice and how procurement irregularities, whether fraudulent or not, can produce downstream consequences for crisis-affected populations. While the research does not aim for statistical generalizability, it identifies consistent structural patterns and their implications for aid integrity and rights-based outcomes.

Findings highlight recurrent vulnerabilities related to vendor vetting, specification design, partner oversight, and the erosion of compliance capacity. In multiple contexts, procurement controls were deprioritized due to emergency procedures, staffing shortages, and pressure to prioritize speed above due diligence. Interviewees described cases involving unsuitable agricultural inputs, inadequate winterization materials, and canceled food distributions resulting

from falsified documentation. These failures carried serious consequences for rights to food, dignity, health, and protection.

Rather than advocating expanded oversight mechanisms, the paper identifies core integrity safeguards that warrant protection even in resource-constrained environments. It emphasizes the need for accountability frameworks that recognize how procurement decisions shape humanitarian harm and protection, contributing to ongoing efforts to align integrity practice with rights-based commitments in humanitarian aid delivery.

About the Author

Lannie Su is an independent investigator and Certified Fraud Examiner (CFE) specializing in procurement fraud and integrity risks in humanitarian operations. She holds a Master of Arts in Anti-Corruption Studies (MACS) from the International Anti-Corruption Academy (IACA), where she was awarded “Most Innovative Thesis” for her research on long-term integrity education.

Lannie has led investigations and advisory engagements for organizations operating in fragile and conflict-affected contexts, including the World Health Organization (WHO), Médecins Sans Frontières (MSF), and multiple International NGOs. Her work focuses on complex procurement irregularities, vendor fraud, and conflicts of interest in emergency and protracted crisis settings. She has conducted field-based and remote investigations across a range of high-risk environments, supporting both accountability processes and preventive risk mitigation.

Her professional expertise bridges investigations, fraud risk management, and integrity advisory work. She is especially interested in the intersection of fraud, accountability, and human rights, and in how procurement failures can translate into harm for affected communities.

In addition to her investigative work, Lannie serves on the Exam Development Committee for the Association of Certified Fraud Examiners. She also develops specialized training modules for integrity and investigations professionals and regularly contributes to a leading integrity-focused publication. Her work aims to strengthen practical accountability in humanitarian systems while grounding integrity frameworks in real-world operational conditions.

Lannie Su, CFE

lanniesucfe@gmail.com | www.lanniesucfe.com

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1. Introduction

As humanitarian funding contracts, procurement oversight is increasingly deprioritized, even as procurement decisions continue to shape the safety, dignity, and material conditions of affected populations. In 2025, governments began unexpectedly and unilaterally cutting billions of dollars in aid funding, most notably with the United States clawing back approximately \$8 billion USD in previously approved assistance (Cserep, 2025; United Nations Regional Information Centre of Western Europe, 2025). While foreign aid budgets are projected to decline further in the coming years, global conflict trends have moved in the opposite direction, with the number and intensity of armed conflicts continuing to rise (Rustad, 2025).

This convergence of shrinking resources and expanding humanitarian need places heightened pressure on operational systems, particularly procurement functions tasked with delivering assistance rapidly and at scale. Although overall organizational budgets are often publicly reported, the resourcing and prioritization of internal compliance, investigations, and oversight units remain opaque. Interviews conducted for this study indicate that integrity-related functions are increasingly deprioritized in the current funding environment, even as operational demands intensify (Interview 7, 2025; Interview 12, 2025; Interview 1, 2025).

At the same time, humanitarian action is guided by normative commitments intended to safeguard affected populations from harm. The Core Humanitarian Standards affirm that people affected by crises should be able to access assistance that does not cause harm and should expect ethical and responsible management of resources (CHS Alliance, Group URD, and Sphere, 2024). Yet these principles are rarely operationalized within procurement decision-making, where considerations of speed, cost, and delivery often dominate. This paper examines how procurement fraud and related irregularities can undermine these

commitments and produce harm for populations already facing acute vulnerability.

Drawing on 17 interviews with practitioners working in logistics, compliance, and investigations across humanitarian organizations, this study explores how procurement irregularities arise in practice and how their consequences extend beyond financial loss to affect beneficiaries directly. The analysis focuses on cases occurring between 2021 and 2024, a period characterized by relatively high levels of humanitarian funding and formal oversight capacity, in order to highlight the persistence of harm even in comparatively well-resourced operational environments.

The following section situates these findings within the broader context of humanitarian systems under pressure, including funding reductions, rising conflict and climate-related needs, and evolving operational frameworks that shape accountability and risk tolerance.

2. Background: Humanitarian Systems Under Pressure

Recent reductions in humanitarian and development assistance have reshaped the operating environment for humanitarian actors. Following aid cut announcements by the United States in early 2025, several major donors implemented similar reductions. France reduced its development assistance budget by €3.7 billion, while the United Kingdom announced a further decrease in foreign aid spending from 0.5 percent of Gross National Income to 0.3 percent by 2027 (United Nations Regional Information Centre of Western Europe, 2025; Loft, et al., 2025; Loft & Brien, 2025). These decisions reflect a broader shift in donor priorities, with increased emphasis on domestic security and defense spending.

These funding contractions coincide with sustained and, in many cases, intensifying humanitarian needs. In 2024, the Uppsala Conflict Data Program recorded 61 state-based conflicts across 36 conflict-affected countries, making

it one of the most violent years since the end of the Cold War (Rustad, 2025). Although non-state conflicts declined slightly from their 2023 peak, they remain significantly higher than levels observed a decade earlier (Rustad, 2025). Climate-related shocks further compound vulnerability, with mortality from extreme weather events disproportionately affecting already fragile regions (World Health Organization, 2023). The International Rescue Committee has identified multiple countries at the intersection of conflict, climate stress, and aid reductions, including Afghanistan, the Democratic Republic of Congo, and Syria (International Rescue Committee, 2025).

In response to these pressures, the 2026 Global Humanitarian Overview estimates humanitarian funding requirements at \$33 billion USD, with \$23 billion prioritized for life-saving assistance (UNOCHA, 2025c). This figure stands in stark contrast to global annual military expenditure, estimated at approximately \$2.7 trillion USD, underscoring the relative scarcity of resources allocated to humanitarian response (UNOCHA, 2025c). As funding gaps widen, humanitarian actors face increasing pressure to concentrate assistance on the most acute needs.

This pressure has been formalized through initiatives such as *The Humanitarian Reset*, a ten-point framework aimed at reducing inefficiency, duplication, and bureaucracy in humanitarian response (UNOCHA, 2025a; UNOCHA, 2025b). The Reset emphasizes prioritization, coordination, and communication, seeking to enable faster and more targeted delivery of assistance under constrained conditions. While accountability is referenced within the framework, it is primarily framed in terms of coordination responsibilities, feedback mechanisms, and alignment with collective priorities, rather than oversight of procurement, fraud prevention, or harm resulting from misconduct.

Notably, the Reset explicitly cautions against introducing additional layers of process in emergency contexts, with senior leadership emphasizing the need to avoid procedural burdens that might slow delivery (UNOCHA, 2025b). Viewed

through an integrity and accountability lens, this operational emphasis can create conditions in which procurement safeguards are weakened or bypassed, particularly through expanded use of emergency waivers.

These dynamics are not new. Even prior to the most recent funding cuts, international humanitarian assistance declined by nearly \$5 billion USD in 2024, representing an 11 percent reduction in sector-wide funding (ALNAP, 2025). During earlier periods of high funding, procurement vulnerabilities were already identified as a systemic risk. In 2021, oral evidence to the UK Parliament described procurement as a “blind spot” in foreign aid oversight, with limited proactive detection of fraud in procurement and outsourcing (International Development Sub-Committee on the Work of the Independent Commission for Aid Impact, 2021)

Together, these conditions shape the context in which humanitarian procurement decisions are made. As operational pressure intensifies and oversight capacity contracts, the risk that procurement irregularities produce harm for affected populations becomes increasingly salient. The following section presents empirical findings from practitioner interviews that illuminate how these risks materialize in practice.

3. Methodology

This study uses a qualitative, exploratory research design to examine how procurement irregularities in humanitarian operations can produce rights-based harm. Procurement processes, oversight dynamics, and downstream consequences often unfold in ways that are not captured in formal reporting structures. Understanding how harm occurs in practice requires insight into decision-making, operational pressures, and institutional constraints that cannot be fully understood through documents alone. A human rights-based lens further supports this approach by focusing attention on the lived experiences of

affected populations and the ways in which procurement practices can compromise their rights to food, shelter, dignity, and protection.

This study focuses specifically on humanitarian assistance delivered in contexts of crisis and conflict, where affected populations are often already experiencing acute vulnerability due to violence, displacement, food insecurity, or environmental stress. Humanitarian operations are characterized by compressed timelines, rapid procurement, and program delivery under conditions of heightened urgency, limited choice, and constrained oversight. In these settings, procurement decisions shape not only program efficiency but the material conditions, safety, and dignity of populations for whom disruptions or failures in assistance have immediate and consequential effects. Situating the analysis within these conditions is essential for interpreting the findings, including how harm is understood and assessed within institutional settings.

3.1 Data sources

The study draws on two sources of data. The primary source consists of 17 anonymized interviews with practitioners working in procurement, compliance, and investigations across United Nations agencies, international NGOs, and global humanitarian and health institutions. These interviews provided operational perspectives on how procurement systems function in practice, how safeguards are applied or bypassed, and how failures may generate harm for affected communities. The secondary source is a desk review of publicly available information on humanitarian funding contractions in 2025 and contextual material relevant to procurement oversight. This review situates the interview findings within broader system-level pressures.

3.2 Sampling

Participants were identified through professional networks using a purposive and availability-based sampling strategy. Individuals were invited to participate if they had direct experience with procurement processes or oversight mechanisms in

humanitarian aid settings. This approach enabled access to practitioners whose roles positioned them to speak to the operational dynamics under examination. Recruitment depended on voluntary participation, which is common in qualitative research involving confidential operational insights. The resulting sample reflects the perspectives of practitioners who were both eligible and willing to contribute during the research period. The sample is not statistically representative, nor was it intended to be. Instead, it provides thematic and experiential insight into procurement vulnerabilities and the factors that shape oversight practices under operational pressure.

3.3 Coding and analysis

Interview data were analyzed using inductive thematic coding. Detailed interview notes were reviewed to identify recurring patterns related to procurement weaknesses, oversight challenges, operational constraints, and forms of harm. Codes were grouped into broader thematic categories that correspond to the findings presented in Section 4. This approach allowed themes to emerge directly from practitioner accounts rather than from predetermined analytical frameworks. The desk review was used to contextualize these themes within trends in humanitarian financing and system-wide shifts in 2025.

3.4 Ethical considerations

Given the sensitivity of the subject matter, all interviews were anonymized, and no identifying information about individuals or their organizations is included in this paper. Descriptions of field-based examples were adjusted to prevent inadvertent disclosure while preserving the substance of the insights shared. Participation was voluntary, and individuals were informed of the purpose of the study and the intended use of their contributions.

3.5 Limitations

The study is subject to several limitations. First, access to formal documentation of procurement irregularities is limited, as investigation reports, donor audits, and internal assessments are generally confidential and not publicly released. As a result, the research relies primarily on practitioner testimony to highlight patterns of risk and harm. Second, the sample reflects available and willing participants rather than a comprehensive cross-section of all humanitarian organizations. While this limits generalizability, the aim of the study is exploratory and analytical rather than statistical. The insights generated by practitioners nonetheless provide valuable evidence of systemic vulnerabilities and their implications for affected populations. The themes that emerged from the interviews underscore how procurement gaps can create conditions for harm.

4. Findings

This section presents the synthesized results of 17 practitioner interviews and examines how procurement fraud and related irregularities can produce harm for affected communities. Given that the research explicitly explores this connection, the analysis begins with a rights-based framing. The Core Humanitarian Standards 4 and 9 commit to people affected by crises that they can “access support that does not harm people or environment” and “can expect ethical and responsible management of resources” (CHS Alliance, Group URD, and Sphere, 2024, p. 4). The findings are presented thematically, with illustrative interview references used to anchor recurring patterns rather than to enumerate frequency across the dataset.

4.1 Categories of Procurement Irregularities

To understand how harm arises in practice, the analysis first identifies the key categories of procurement irregularities described by practitioners.

4.1.1 Vendor Vetting Failures

Across interviews, practitioners highlighted recurring weaknesses in vendor verification and due diligence, especially in contexts where markets offered only a small number of viable suppliers. Respondents reported forged or falsified documents, fabricated quotations, and indications of collusion between vendors as being common occurrences during procurement exercises. Several also noted cases in which suppliers used multiple business identities to simulate competition, which complicated verification and increased the likelihood of undisclosed ownership links.

Across multiple organizations, practitioners described difficulties confirming supplier legitimacy due to limited access to credible registries and inconsistent recordkeeping. One interviewee identified the absence of reliable market information as their strongest procurement risk in their operating context (Interview 12, 2025). Others highlighted fragmented vendor records across internal systems and an over-reliance on a small group of “trusted” vendors that received repeat awards without sufficient competitive testing.

These accounts indicate that vendor vetting irregularities arise from both deliberate misconduct and structural constraints, including thin markets, information gaps, and routine workarounds that reduce scrutiny.

4.1.2 Quality and Specification Failures

Several interviewees described cases in which procured goods did not meet required technical, seasonal, or contextual specifications. Several respondents identified cases where agricultural inputs were unsuitable for their intended use. One practitioner explained that rice seeds provided in a livelihood project were inappropriate for the altitude in which farmers lived, resulting in complete crop failure and financial losses for participating households (Interview 1, 2025). Another described wheat seeds that arrived after the planting season,

undermining the expected harvest and affecting food security for several months (Interview 10, 2025).

Other examples involved goods that met the formal category requested but were not fit for purpose. One respondent noted that fuel procured during an emergency winterization response produced short bursts of heat suitable for cooking rather than sustained home heating, reducing the protective value of the intervention for households in cold climates (Interview 2, 2025). Several interviewees described substandard shelter items, such as tents or covers that leaked during rain or were insufficiently wind resistant, in part because quality inspections were skipped due to urgency or access constraints. Poor-quality non-food items also appeared in multiple accounts, including torn blankets and weak jerry cans supplied through compromised procurement processes.

In some cases, inappropriate selections were attributed to unclear or incomplete specifications at the outset. Respondents described procurement committees that struggled to compare bids because technical requirements were not adequately defined, reducing their ability to assess quality and suitability. Interviewees highlighted that specification failures reflected both operational pressure and weaknesses in program design, creating avoidable risks to the safety, dignity, and well-being of affected communities.

4.1.3 Operational Overrides and Waivers

Respondents across organizations described heavy reliance on emergency waivers and accelerated procedures to meet urgent operational needs. Although such exceptions are an accepted feature of crisis response, practitioners noted that they often extended well beyond the initial emergency period. Respondents reported that compressed timelines and donor expectations for rapid delivery created conditions in which steps such as competitive bidding, documentation checks, and pre-delivery inspections were abbreviated or omitted. Several interviewees also described instances in which documentation was completed

retrospectively, including notes-to-file or procurement justifications finalized only after goods had already been delivered (Interview 12, 2025).

In some organizations, waivers were not limited to rare or exceptional circumstances but became normalized as a routine mode of procurement, particularly in protracted responses where operational urgency persisted even as conditions stabilized. One respondent explained that urgent procedures introduced to address immediate needs were sometimes maintained beyond the initial crisis period, creating an environment in which irregularities became normalized and more difficult to challenge (Interview 17, 2025). One interviewee also described pressures at the end of grant periods that led to practices such as backdating documents to meet expenditure timelines, which contributed to weakened accountability and signaled to staff that procedural flexibility was acceptable (Interview 11, 2025).

4.1.4 Partner Oversight Gaps

Interviewees identified recurring weaknesses in the oversight of implementing partners and subcontracted procurement. Several practitioners described cases in which local partners selected suppliers based on community pressures, informal networks, or expectations from local authorities, which undermined competitive processes and increased the risk of conflicts of interest (Interview 8, 2025). Respondents also reported that headquarters and country offices often had limited visibility into partner-level procurement decisions, especially when partners operated in remote or insecure locations. This lack of visibility was compounded by communication gaps between program, logistics, and compliance teams, which reduced the ability to identify irregularities early or validate procurement justifications (Interview 12, 2025).

Oversight gaps were not limited to low value transactions. In one example, a partner's rushed supplier selection resulted in the use of substandard materials that later contributed to safety risks during construction activities (Interview 12,

2025). One interviewee described instances in which partner procurement documentation was incomplete, inconsistent, or submitted only after distribution, weakening the ability to verify adherence to required procedures (Interview 8, 2025).

Overall, respondents indicated that weak partner oversight created conditions in which procurement decisions could diverge from program needs and opened space for both procedural shortcuts and inappropriate supplier influence.

4.1.5 Resource Depletion in Compliance and Investigations

A further set of accounts focused on reductions in staffing and operational resources for compliance, risk management, safeguarding, and investigations. Several respondents explained that compliance teams were often composed of only one or two staff members who were responsible for reviewing high volumes of procurement files, supporting audits, and responding to reported concerns, leaving little capacity for real-time verification or proactive monitoring. In some cases, organizations had reduced global safeguarding and/or integrity staffing to minimal levels, which limited their ability to identify systemic weaknesses or follow up on red flags in a timely manner (Interview 7, 2025) (Interview 11, 2025).

Practitioners also described oversight processes that were predominantly retrospective. Instead of reviewing procurement steps before commitments were made, teams often examined documentation only after programs had already been implemented, reducing the opportunity to prevent irregularities before goods were procured or delivered (Interview 11, 2025). One interviewee highlighted that investigative lessons were not consistently incorporated into future procurement planning, due in part to limited personnel and the siloed nature of investigative findings (Interview 6, 2025).

Staffing gaps were compounded by operational pressure and the prioritization of program delivery over internal controls. One respondent reported that

compliance functions in their organization were frequently the least resourced units in humanitarian operations and were among the first to experience budget cuts during periods of financial constraint (Interview 11, 2025). Limited training for procurement and program staff on identifying fraud risks further narrowed the system's capacity to detect irregularities early (Interview 16, 2025).

Many interviewees indicated that depleted compliance and investigations capacity created an environment in which procurement irregularities were more likely to go undetected or unaddressed. This contributed to weaker internal accountability and reduced the ability of organizations to translate known risks into strengthened prevention measures.

4.2 Direct Consequences for Affected Communities

While Section 4.1 examined the procedural and structural weaknesses that shape procurement risk, practitioners also provided examples in which procurement fraud or irregularities resulted in harm to crisis-affected communities. These cases illustrate how administrative or procedural lapses can have material consequences for safety, livelihoods, and well-being.

Case 1: Fatality and structural failures in a canal project

In one intervention, a cash-for-work beneficiary was killed, and several others were injured when a supplier used unsafe excavation methods during the early stages of constructing a community water canal. According to the interviewee, the implementing partner had accelerated the supplier selection process due to delivery pressure, which resulted in the engagement of a contractor whose technical capacity had not been sufficiently verified (Interview 12, 2025).

The procurement focused primarily on identifying the lowest-priced bid, with insufficient assessment of whether the proposed excavation methods were technically feasible or safe. The supplier's bid relied on the use of dynamite instead of machinery for excavation, as dynamite was cheaper and yielded a more

competitive bid price. This decision directly contributed to the fatality and injuries that occurred during the excavation works (Interview 12, 2025).

Alongside the immediate harm, the supplier also used substandard construction materials and weak building practices during the subsequent canal construction phase. According to the interviewee, the materials chosen were also lower cost, did not meet the required standards, and are expected to compromise the canal's structural integrity over time (Interview 12, 2025). These deficiencies raise concerns about long-term structural stability and the sustainability of the intervention, with likely future consequences to the livelihoods of surrounding communities and their ability to access water (Interview 12, 2025).

This example illustrates how rushed procurement decisions can create multiple layers of harm: acute physical danger during implementation and chronic vulnerability stemming from infrastructure that is unlikely to remain functional.

Case 2: Incorrect seed strain resulting in crop failure

In one livelihood intervention, farmers received seeds that were unsuitable for the altitude in which they lived. Although the procurement required altitude-specific seed varieties, the supplier substituted cheaper, unsuitable seed. The local community blamed the NGO for “not checking properly” reflecting a perceived failure in verification rather than in program design (Interview 1, 2025).

Households then spent limited resources on land preparation, planting, and fuel, and the crops failed across multiple sites. (Interview 1, 2025). For families reliant on a single harvest cycle, the loss of the crop has immediate implications for food security and household income, as households had already spent scarce resources on labor and fuel (Interview 1, 2025).

This case illustrates how inadequate verification of delivered inputs can undermine program outcomes and expose already vulnerable households to significant livelihood loss.

Case 3: Winterization kits delivered after winter

In one winterization intervention, both procurement integrity and program delivery were affected by weaknesses in supplier selection and oversight. A logistics officer explained that a senior staff member had an undeclared, potential conflict of interest to the selected supplier (Interview 8, 2025). The selection proceeded despite concerns raised about the supplier's reliability.

A second logistics interviewee from the same organization provided further detail, noting that once contracted, the supplier repeatedly failed to meet required quality standards (Interview 15, 2025). The winterization materials were rejected multiple times during pre-distribution verification, which contributed to significant delays. As a result, the kits were delivered after most of the winter season had already passed, reducing their practical value for affected families who needed weather-resistant items earlier in the season.

This case illustrates how an undisclosed conflict of interest and weak partner oversight can transform a routine procurement into a failure that undermines both program effectiveness and the safety of crisis-affected households.

Case 4: Fuel procured for cooking rather than heating

One interviewee described a winterization response in which households received solid-fuel briquettes that were appropriate for cooking but ineffective for heating homes during cold conditions (Interview 2, 2025). Although the items fell within the general category of solid fuel, the briquettes burned rapidly and produced short bursts of heat, meaning they could not sustain indoor warmth through the night. As a result, the winterization response failed to provide sustained heating that households required during winter.

The interviewee explained that the mismatch reflected gaps in how functional requirements were integrated into procurement decision-making (Interview 2, 2025). Although the intervention required a heating fuel capable of providing

sustained warmth, the selection process prioritized the lowest-cost option. As a result, briquettes designed for short-burn cooking use were procured primarily on the basis of lowest cost, despite being unsuitable for maintaining indoor heat in winter conditions. Key functional characteristics such as burn duration and calorific value were not sufficiently understood and evaluated in the selection process, leading to a cost-based decision to purchase fuel not designed to meet required winterization needs.

Although no injuries were reported, the failure undermined the effectiveness of assistance at a time when households depended on reliable heating options to protect health and maintain basic living conditions.

4.3 Emotional and Dignity- Related Harm

Procurement irregularities can erode more than the quality of assistance received. They also affect how crisis-affected people experience aid, including their sense of dignity, predictability, and trust in humanitarian actors. Respondents explained that beneficiaries often invest hope in promised support, particularly during prolonged crises when few safety nets exist. When procured items arrive late, are unusable, or fail to meet basic expectations, households may interpret these outcomes as signs that their needs were not taken seriously.

Several interviewees highlighted that such disappointments carry emotional weight. For families who rely on a single harvest cycle, seed failure not only undermines livelihoods but also increases the risk of food insecurity, malnutrition, and, in severe cases, starvation. In winterization responses, receiving goods that cannot provide adequate warmth leaves households unprotected during periods when exposure to cold can lead to hypothermia or other life-threatening conditions. These human consequences underscore that procurement irregularities affect not only program efficiency but also the survival and dignity of vulnerable communities. Respondents noted that these emotional and dignity-related impacts rarely appear in procurement analyses, yet they

shape how communities perceive the fairness, respectfulness, and reliability of humanitarian support.

These accounts are consistent with human rights-based standards that treat dignity as an operational concern. Under frameworks such as the Core Humanitarian Standard, assistance should be appropriate, relevant, and provided in ways that reinforce people’s sense of worth. Interviewees indicated that procurement irregularities can unintentionally undermine these commitments even when no deliberate misconduct is involved.

4.4 Outlier Positions

A small number of respondents expressed views that diverged sharply from the broader dataset.

One interviewee argued that providing substandard goods does not constitute additional harm because affected households are “already suffering” (Interview 2, 2025). In their view, substandard assistance does not meaningfully alter well-being under emergency conditions. This perspective stands in contrast to other interviewees, who emphasized that inappropriate or unsafe items can materially heighten exposure to risk. It also conflicts with the *Core Humanitarian Standard on Quality and Accountability*, which require that assistance be safe, appropriate, and designed to reduce, rather than compound, existing vulnerabilities. Evidence from multiple cases in this research demonstrates that poorly specified or low-quality items can increase health and safety risks, deepen livelihood insecurity, and, in some contexts, lead to fatal outcomes.

A second outlier perspective centered on the claim that procurement fraud primarily harms donors rather than crisis-affected populations. This interviewee reasoned that diversion or irregularities typically occur after goods reach the community, so the immediate loss falls on donors, with any impact on households arising later, and only if exposure of diversion triggers reductions in

future funding (Interview 7, 2025). This donor-centric framing differs from the other responses, in which procurement irregularities are described as having direct operational consequences for households through reduced quality, unsafe execution, or inappropriate items.

Together, these outlier perspectives illustrate the diversity of assumptions that shape how practitioners interpret procurement risk and its consequences. They also highlight the conceptual distance that can exist between financial compliance frameworks and rights-based assessments of humanitarian impact.

5. Discussion/Implications

This section examines the implications of these findings for how humanitarian procurement risk, accountability, and harm are understood and governed, particularly under conditions of fiscal contraction and operational pressure.

The findings from this study point to a set of structural vulnerabilities in humanitarian procurement that extend beyond isolated irregularities. Overall, practitioners described how thin markets, compressed timelines, emphasis on cost-saving materials, depleted compliance capacity, and fragmented oversight mechanisms create conditions in which procurement irregularities become more likely and more consequential. These dynamics are intensified in protracted crises, where emergency flexibilities persist long after the acute phase, normalizing procedural irregularities that weaken accountability. In several cases, decisions justified primarily on the basis of lowest cost displaced functional suitability and safety considerations, illustrating how narrow value-for-money interpretations can amplify rather than mitigate risk and harm.

These findings also have implications for how accountability is currently framed within humanitarian policy initiatives such as The Humanitarian Reset. While the Reset emphasizes prioritization, efficiency, and coordination under conditions of scarcity, it offers no guidance on accountability for procurement integrity, fraud

prevention, or downstream harm arising from procurement decisions. The cases examined in this study suggest that accountability mechanisms focused primarily on delivery metrics, coordination responsibilities, or communications risk overlooking how procurement practices directly shape safety, dignity, and material outcomes for affected populations. In this sense, the findings highlight a gap between prevailing accountability frameworks and the lived consequences of procurement irregularities in crisis settings.

The timing of the cases analyzed in this study further sharpens these implications. The procurement irregularities and resulting harms documented here occurred largely between 2021 and 2024, a period characterized by relatively high humanitarian funding levels and the presence of formal oversight mechanisms. The persistence of harm under these relatively well-resourced conditions raises concern for how procurement risks may evolve as funding contracts and integrity functions are further deprioritized. As compliance, investigations, and safeguarding capacities are reduced, the likelihood that procurement irregularities translate into unmitigated harm for affected communities may increase, particularly in protracted crises where emergency practices become routine.

A central implication of the research is that procurement integrity cannot be understood solely through financial or compliance frameworks. In multiple cases, deficiencies in vendor vetting, specification accuracy, and oversight translated directly into harm for affected communities. These harms included physical injury, loss of livelihood, heightened exposure to cold, and long-term structural risks linked to unsafe construction or unsuitable agricultural inputs. This aligns with emerging policy debates that position corruption as barriers to the realization of rights, rather than only threats to financial stewardship. This framing is consistent with recent UN human rights resolutions recognizing corruption as a structural barrier to the enjoyment of economic and social rights.

Variation across functional roles provides additional insight into how procurement risks are perceived and managed. Logistics and procurement staff tended to emphasize operational bottlenecks, supplier reliability, and market constraints, while compliance and investigations personnel focused more on documentation gaps, insufficient staffing, and the retrospective nature of oversight. These vantage points informed different interpretations of the same failures and suggest that improving procurement integrity will require cross-functional approaches rather than isolated technical fixes. While this study did not treat role-based differences as a standalone finding, these variations enrich the interpretation of the evidence and will be important to analyze further in future research.

The case studies also illustrate that affected communities rarely receive restitution or remedial support when procurement irregularities occur. Losses borne by households including failed harvests, inadequate shelter, or exposure to unsafe work conditions were not followed by compensatory measures, corrective assistance, or program redesign. This gap underscores a broader accountability deficit within humanitarian systems, where downstream harm often goes unaddressed because upstream failures are treated as procedural rather than protective issues.

Finally, the presence of outlier perspectives highlights a conceptual divide in how procurement risk is understood within humanitarian systems. Most notably, some respondents argued that substandard goods do not cause additional harm because recipients are “already suffering,” or that procurement fraud primarily harms donors rather than affected communities. These views reflect a donor-centric risk culture that sits outside humanitarian protection norms and obscures the lived consequences of procurement decisions for crisis-affected people. Addressing this gap is essential for aligning procurement practice with humanitarian principles and the Core Humanitarian Standard requirement that assistance be safe, appropriate, and designed to reduce vulnerability.

The findings underscore that procurement cannot be treated as a purely administrative or financial function within humanitarian systems. Procurement decisions made under pressure about suppliers, specifications, and oversight directly shape whether assistance reduces or compounds existing vulnerability. As humanitarian actors navigate an era of constrained resources and heightened need, integrating procurement integrity into accountability frameworks will be central to aligning operational practice with humanitarian principles and commitments to do no harm.

6. Summary

This paper examined procurement irregularities in humanitarian operations through qualitative analysis of 17 interviews with practitioners working across logistics, compliance, and investigation functions. The findings demonstrate that procurement irregularities are not merely administrative lapses but structural issues that carry significant rights-based implications for affected populations.

Five recurrent categories of vulnerability emerged: vendor vetting gaps, quality and specification errors, operational overrides in emergency contexts, weak oversight of implementing partners, and the depletion of compliance and investigative capacity. Each category was linked to downstream effects on households and communities, including failed harvests, unsafe working conditions, inadequate winter protection, and compromised infrastructure. Four case studies illustrated how specific procurement decisions produced both immediate and long-term harm, while also highlighting the absence of restitution or remedial action for affected communities.

The analysis also identified divergent perspectives within the sector. While most respondents emphasized community-level harm, a few framed procurement irregularities primarily through donor-centric or operational-efficiency lenses. These outlier views underscore a persistent tension between compliance-oriented

interpretations of procurement risk and rights-based understandings grounded in humanitarian protection.

Overall, the findings suggest that improving procurement integrity requires more than procedural reinforcement. It demands integrated oversight, cross-functional collaboration, stronger market and specification analysis, and accountability frameworks that recognize procurement as a determinant of safety, dignity, and equitable access to assistance. These implications are particularly salient for implementers, donors, and oversight bodies operating in environments marked by urgency, resource constraints, and elevated operational risk.

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 +43 2236 710 718 100

 mail@iaca.int



www.iaca.int