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Humanitarianism Governed: Rules, Identity, and Exclusion in Relief Work

Humanitarianism inhabits troubled spaces. In the last decade alone, aid workers have intervened in response to civil conflicts, natural disasters, and epidemics, from Syria to the Philippines to Haiti, and in countless places in between. It is in times of crisis and dislocation, when political order has seemingly failed, that the humanitarian impulse finds its starkest expression. In the words of one of its prominent practitioners, the former president of Médecins Sans Frontières (MSF) James Orbinski, humanitarianism "aims to build spaces of normalcy in the midst of what is abnormal."[1] Inasmuch as "emergency" has become the counterpoint to global order, humanitarian aid represents a pathway toward stability.[2]

This essay investigates the processes by which humanitarians, to appropriate Orbinski's insight, "build spaces of normalcy" in their own world. This phrase requires unpacking. In the first place, it suggests a humanitarian concern with regularity and even regulation—in short, with order and governance—both enduring themes in politics. Through the word "normalcy" (and its root "norm"), the phrase also implies an intimate link between the creation of order and the adjudication of appropriate behavior. Indeed, for these very reasons, humanitarian themes have been subject to increasing attention in studies of global governance. Scholarship has found that humanitarian rhetoric channels political action in crises: humanitarian action creates zones of order among populations, humanitarian politics support policies of containment, and humanitarian images govern emotions like compassion.[3] Humanitarianism is itself regulated in ways familiar to students of global governance. States earmark funds, mandate reporting requirements, and set the legal terrain; multilateral institutions like the United Nations or European Union fund and coordinate action.[4]

In recent decades, humanitarianism has also experienced an internal transformation in its governance mechanisms, driven in large part by nongovernmental organizations (NGOs). Aid work is now subject to at least one hundred international *self-regulatory initiatives*—defined as "self-organized attempts at collective action without direct intervention from the state"—with scores more at the regional and local levels.[5] Thirty years ago, the notion of a code of conduct in humanitarianism was basically inconceivable; today, it is quotidian. From principled codes to elaborate third-party monitoring regimes, humanitarian self-governance encompasses every conceivable aspect of organizational life, from personnel policy to advertising to financial propriety. For instance, the Sphere Project—analyzed in detail below—creates *globally applicable* minimum standards for the provision of disaster relief, including guidance for shelter construction, medical treatment, and sanitation. Sphere

has involved hundreds of NGOs, states, and institutions as well as thousands of individuals; its widely used *Minimum Standards* handbook has sold tens of thousands of copies. The scale and ambition of projects like Sphere herald changes in the constitution of humanitarianism and in its organizational reality. What drives organizations to develop these mechanisms? What is their function?

For many scholars working in this area, the answer to these questions has centered on *donors*, namely states. State pressure incentivizes self-regulation, and the goal of the resulting initiatives is, according to one popular formulation, to "credibly signal . . . commitment towards good governance."[6] But this succinct framing conceals complex, contested, and culturally contingent social realities. None of these words—"credibly," "signal," "good governance"—is clear cut. *What* is good governance? *How* is it produced? *Which* signals are recognizable? The literature's focus on rational design has impeded serious examination of social and normative considerations in self-regulation.[7] Consequently, existing research has actually understated the significance of such initiatives. As I develop in this essay, efforts to regulate are simultaneously efforts to *constitute*: to specify guiding values and governing practices and, thereby, to create and distinguish a social category, humanitarianism. At its core, I find that the struggle over standards is not only a struggle over quality; it is a struggle to define the humanitarian soul.

Through analysis of two major self-regulatory initiatives, I situate self-regulation in the context of a humanitarian crisis of legitimacy. Following emergencies in the horn of Africa in the 1980s and Rwanda in 1994, especially, humanitarianism has been subject to a growing cacophony of voices that no longer takes as sacrosanct its practitioners' claims to be doing good in times of need. From within the sector, too, has come a realization that good intentions are no longer enough, that aid may bring harm to the very people it intends to assist, and that something must be done to ensure the field's future viability. But *what* must be done—and *how*? I find that the legitimacy crisis has enabled an often-contentious internal process of dialogue and debate over the nature of humanitarianism itself. Self-regulation emerged as a vehicle for *self-representation*; aid veterans turned to standards in a bid to shift the very bases of humanitarian legitimacy. From charity and good intent, these initiatives have, in different ways, attempted to enact an identity of humanitarianism as professional, regulated, and rooted in international law and human rights. However, despite (and sometimes because of) their technical grounding, these standards have not been universally welcomed by humanitarians. The elevation of certain action orientations has implied the devaluation of others.

These ideas are developed as follows. I begin by introducing nonprofit self-regulation and sketch the contours of its study. I emphasize the diffuse, rather than direct, pressures experienced by humanitarians, which I characterize as legitimacy challenges, and narrate external stimuli as opportunity structures: crises create openings for reform, but the actual content of self-regulation is largely shaped by debates and disputes among practitioners. I understand these practitioners—the humanitarians—as constituting an *organizational field*, a local order in which relations are shaped by "shared (which is not to say consensual) understandings about the purposes of the field, relationships to others in the field (including who has power and why),

and the rules governing legitimate action in the field."[8] I use the field framework to draw out the *constitutive* and *contested* dimensions of self-regulation. I then examine two cases: the Sphere Project, which emerged in the wake of the Rwandan genocide and defines universally applicable humanitarian standards, and the Code of Conduct on Images and Messages, a European initiative addressing representative practices. In both cases, I find that initial agreement among aid workers on the necessity of reform soon gave way to competing visions of humanitarian identity.

Humanitarianism, Governed

This study sits at the intersection of two academic research tracks. On the one hand, the wave of interest in *humanitarianism*—actions to relieve the suffering of distant strangers, generally understood as emergency relief—is reflected in the growing number of monographs focusing on its history, principles, and operational dilemmas.[9] At the same time, the global governance concept has quickly evolved into "one of the central orienting themes in the practice and study of international affairs."[10] However, *humanitarian governance*—the rules and authority relationships overseeing relief work—has "received surprisingly little attention."[11] Rather, the prevailing view of the aid system is of, as Weiss frames it, "a myriad of competitors in the unregulated free market."[12] Humanitarianism is seen as, if not ungoverned, only *minimally* governed.

There is truth in such statements. The governance of international aid is largely national in basis, which means that stronger states, such as the United States or European Union members, are able to exert levels of financial and political control that far exceed that of developing or crisis-stricken states, for instance in Haiti or Syria.[13] While the humanitarian system has grown dramatically in size and scope since the 1980s, the internationalization of NGO work has seemingly outpaced the ability of states and other bodies to regulate it in meaningful ways. Notwithstanding efforts by the UN's Emergency Relief Coordinator, no single individual or entity consistently wears the humanitarian leadership "hat."[14] This fact has contributed to wasteful and even counterproductive dynamics in crisis situations, particularly in the context of state collapse.

However, while external control is uneven, humanitarians have made significant progress in developing internal controls through mechanisms of self-regulation. By one account, over three hundred civil society initiatives guide practice across fields such as humanitarianism, development, the arts, and philanthropy, including dozens of aid and development standards that, collectively, implicate practically every conceivable facet of organizational behavior.[15] If global governance, in the first instance, was viewed largely as a state-driven enterprise, contemporary governance implies the extension of the processes of rule and order-making deep into the fabric of the non-state world.[16] Theoretically, then, these developments compel us to reconsider the role of NGOs as "global governors."[17] In addition to their work instigating and enforcing international rules and norms on other actors, namely states, as in the case of landmines or human rights, and transnational corporations, as with corporate social responsibility, NGOs are also active agents in their *own* regulatory destinies.[18]

In this section, I develop a framework for understanding the sources and sectoral consequences of the self-regulation phenomenon. I begin by drawing from the civil

society literature to identify several dynamics, including growth and public pressure, often used to explain self-regulation. I characterize these as legitimacy challenges. These scope conditions prepare the terrain for humanitarian reform; I find that they are (arguably) necessary, but not sufficient, to account for the content of the ensuing initiatives. The goal is to capture how diffuse regulatory impulses are interpreted and articulated in the form of concrete regulations. I do this by understanding humanitarianism as an organizational field, a concept I use to explore the implications of self-designed rules on humanitarian identity. I make two points: first, that governance initiatives are *constitutive*, with self-regulation emerging as a vehicle for self-representation, and, second, that the contingency of the process gives rise to dynamics of *contestation*.

Opportunity in Crisis

What accounts for the rise of humanitarian self-regulation? The most widely cited factors are structural and stem from the reconfiguration of state authority under neoliberalism, which began in the 1970s and accelerated with the end of the Cold War, and the concomitant rise of NGOs as the preferred channel of service provision.[19] States devolved direct involvement in areas related to development and social welfare; they would fund, but regulate, these activities. This ideology is reflected in the growth in funding available to humanitarian organizations, with Official Development Assistance rising from $2bn in 1990 to $20.3bn in 2016, while a concurrent increase in intra-state conflict and human displacement provided new opportunities for intervention.[20] As for aid agencies, funding fueled organizational proliferation, growth, and complexity. Barnett cites the example of MSF, which grew from a two-room office in the 1970s into an international network with, as of 2016, twenty-one branches and 1.5bn in revenue, while World Vision International evolved from the personalistic leadership of its founder to become the world's wealthiest NGO.[21] Market dynamics have driven competition and international expansion, and they have also heightened the risk of scandal to organizations that depend significantly on public support. Thus, Ebrahim suggests that self-regulation arose in part out of a desire to "forestall potentially restrictive government regulation."[22]

States, and the material power they wield, play a prominent role in the literature on self-regulation. As the Ebrahim's words illustrate, certain assumptions underpin research in this area: that actors are rational calculators, that the impetus as well as audience for self-regulation is external to the sector, and that material factors outweigh ideational factors. These ideas are crystallized in the "accountability club" approach to NGO self-regulation, which remains the touchstone for research in this area.[23] According to this approach, self-regulation arises from a principal-agent relationship: facing public pressures to clean up their act, credible NGOs create and join clubs to bolster branding and improve performance.[24]

Market forces and intra-sectoral competition do play a prominent role in relief work, as multiple sources have confirmed.[25] However, the application of economic pressures to humanitarian self-regulation is far from straightforward. For one, the strategic self-regulation narrative appears to understate the role of NGO value orientations in shaping humanitarian practices. Research, on accountability in particular, has

demonstrated the importance of the democratic and moral claims advanced by NGOs.[26] Second, the external signaling assumption merits scrutiny. If indeed donors prefer clearly defined and enforceable standards, it should be noted that the vast majority of NGO codes are actually voluntary and unenforceable, while branding remains weak in light of the proliferation of standards and apparent sectoral confusion among them.[27] Finally, donor pressure itself is often unclear, given the existence of multiple principals and the mixed messages they send.[28]

The pressures humanitarians face are real, even if they are more *diffuse* than direct. Despite rising relief budgets and increased numbers of actors, malaise has pervaded the field for at least two decades. The most recent "State of the Humanitarian System" report, produced by and for humanitarians, admits as much: "Although it has become a cliché for reports of this kind to declare the humanitarian system 'in crisis' or 'at a crossroads,'" it begins, it too proceeds to identify weaknesses in the humanitarian system.[29] This crisis is not the result of any one factor so much as from an accumulation of them, including coordination dilemmas, overstretch and failures, and inhospitable political contexts. These challenges, and the humanitarian recognition of them, constitute a humanitarian crisis of legitimacy.[30]

In humanitarianism, *legitimacy*—the societal perception of appropriateness—traditionally arises out of the moral selflessness of the act; it is embodied in the charitable aid worker who acts in the interests of humanity when states fail to fulfill their duties.[31] Increasingly, though, good intentions are no longer enough and NGOs' normative claims are not accepted at face value by publics. While opinion polls show that public trust in NGOs is still higher than that of government and business, it is on the decline.[32] Nick Leader thus evokes an "appreciable shift of the Western media perception of the aid worker away from the white heroine to a much more ambiguous figure who may be 'feeding killers.'"[33] As a veteran of the Irish nonprofit sector explained to me: "We're very conscious of the fact that, OK, the Church has come under scrutiny, business, banking, government—we're next . . . And you have a generation now that aren't just going to accept that they're doing good. We've got to show that we make a difference, and therefore we've got to be transparent and accountable."[34] Here, external pressure serves as an *enabling* factor; the nebulous weight of societal expectations is experienced by humanitarians as a crisis. Crisis motivates; it disrupts social order and thereby stimulates organizational change.[35] As the self-regulation case demonstrates, the perception of illegitimacy creates a political opportunity structure—it opens political space and provides discursive resources for situated social actors, often described as normative entrepreneurs, to advocate alternate visions of humanitarian action.[36] These causal processes are modeled in Figure 1.

Self-Regulation, Self-Representation

The perception of crisis creates an opening, but this potentiality—the stimulating force of societal pressure—must be translated into action. The crisis of legitimacy is filtered and refracted through the optic of humanitarianism, which exists as a layered political and social space populated by networks of actors, woven together by dense informational and relational ties, and oriented around broadly shared beliefs. The *kinds* of standards that emerge, the *values* that they promote, and the *mechanisms* by
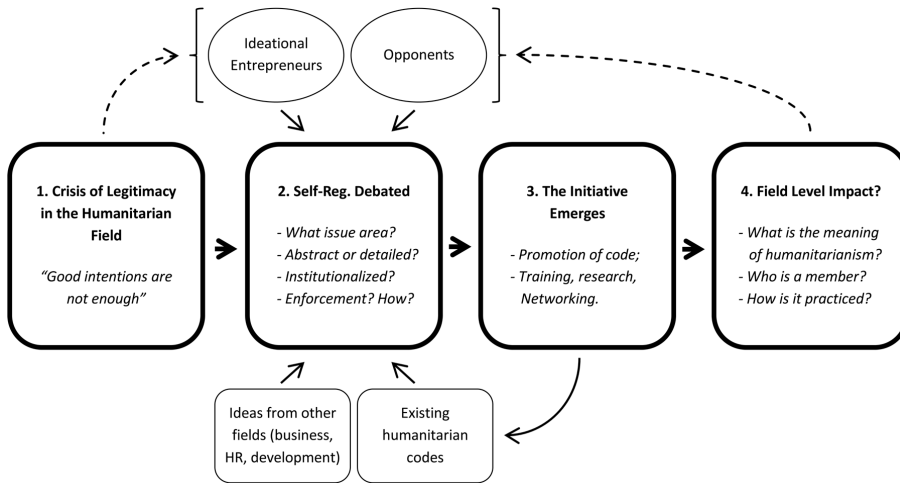
Fig.1. Causal processes.

which they structure practice—these outcomes hinge on processes set in motion within this humanitarian social space.

I understand humanitarian organizations as forming an *organizational field*: a local social order composed of organizations and characterized by rules, values, and knowledge specific to it. Fields are socially constructed in that they turn on a set of understandings—of the stakes, positions, rules, and interpretive frames—crafted over time by members.[37] These understandings are delineated (implicitly or explicitly) and enforced by institutions and rules, which Fligstein and McAdam refer to as "internal governing units."[38] Rules, and I include self-regulations among them, are central to the institutionalization and constitution of the field; they differentiate it from or situate it within other fields—proximate or distal, dependent or independent. These boundaries are of vital importance as they "affect how organizations select models for emulation, where they focus information-gathering energy, which organizations they compare themselves with, and where they recruit personnel."[39] This means that a member of a field will tend to imitate the successful or socially rewarded strategies of a peer before looking elsewhere, and that imported practices may not immediately or automatically be recognized as appropriate. Humanitarians will look to humanitarians before emulating private security professionals, for instance.

For scholars dissatisfied with the functionalism of network theory or the instrumentalism of principal-agent approaches, the field frame provides a way to grapple with social forces and group dynamics outside or across national borders or formal institutions. Its relevance to humanitarianism has been demonstrated in previous scholarship.[40] Meaningful differences persist among scholars working in this area, notably on the scope conditions for change, divergence, and resistance. Whereas Powell and DiMaggio emphasize isomorphic stability, Bourdieu and his followers incorporate fluidity and contingency.[41] Here, I follow Fligstein and McAdams in observing that fields have lifecycles: periods of emergence are characterized by fluidity, while stable fields tend toward incremental change, though jockeying for position

remains a hallmark of fluid and stable fields alike.[42] Stable fields may still be disrupted. Systemic shocks—episodes that destabilize social order—generate opportunities for innovative action and may lead to the importation of models from cognate fields, such as, in humanitarianism, ideas from the development and human rights sectors. Crises of legitimacy are one such destabilizing force since, according to Reus-Smit, they signal "critical turning points" when the decline in an institution's legitimacy compels adaptation or disempowerment.[43]

Applied to nonprofits, the organizational field provides tools to explore, as Gugerty and Prakash suggest, "norms of appropriateness, rather than [or, *as well as*] instrumentality" in self-regulation.[44] I use it to elucidate two aspects of the regulatory project. First, self-regulation is *constitutive*. From principles (*who* is a humanitarian?) to practices (*what* is appropriate?) to processes (*how* are organizations run?), self-regulation is directed *within* the field, and *at* the field itself. Second, the field frame captures the persistence of *contestation* in nonprofit work, with self-regulatory initiatives understood as mechanisms by which NGOs consolidate or improve their position.

My analysis of self-regulation begins with the recognition that rules both regulate and *constitute*. What constitution means, for Nicholas Onuf, is that "rules tell us who the active participants in a society are" and "which goals are the appropriate ones . . . to pursue."[45] In constructivist approaches to international relations as well as in the organizational sociology upon which they often draw, identities—and not simply capacities or interests—are understood as contingent on processes of interaction and engagement. Thus, Alastair Iain Johnston argues, "actors who enter into a social interaction rarely emerge the same."[46] For Fligstein and McAdam, whose field framework underpins this study, "the human capacity and need for meaning and identity is as much a structuring force in social life as the material demands on the collective."[47] Collectively, these propositions direct our analytic attention from without to *within*, to examine the impact of humanitarian rules on the constitution of the sector (as a social sector) and the identities of agencies themselves.

Put another way, self-regulation is performative; it is a practice that brings into being that which it claims to regulate—humanitarian nonprofits as a professional field. Performativity foregrounds the everyday repetitive acts through which social categories, like gender or, here especially, humanitarianism, are constructed. As Butler explains, the term captures "a set of processes that produce ontological effects, that is, that work to bring into being certain kinds of realities or . . . that lead to certain kinds of socially binding consequences."[48] These processes include speech acts, sectoral technologies and modes of activity, and other repeated acts of definition and delimitation, the cumulative effect of which is to establish (often implicitly) "this is what we are," and, hence, also "this is what we are not." Through performativity, we perceive that routinized, specialized, and technical tasks have meaning that extends beyond the visible manifestation of the act. For instance, as Power documents in an influential study of auditing, the rise of management techniques is cultural as much as it is technical. It is through practices of measurement and verification that auditors simultaneously enact their expertise *and* reconstitute organizations around ideals such as "efficiency" and "quality."[49] So, too, with humanitarianism: innovative practices

recenter the field and provide "stages" on which aid workers perform both ethical principles and technological proficiency.[50]

These performances, and the constitutive effects they produce, are contingent on constellations of social and material forces, which is to say (among other things) that identity is malleable; it contains within it tensions and possibilities for change. Per Butler: "In its very character as performative resides the possibility of contesting its reified status."[51] This leads to my second observation: *contestation* is a persistent feature of the humanitarian field, *as* a field, and self-regulation provides mechanisms by which actors consolidate or improve their position. Competition may arise over material resources, certainly, but ideational resources are no less important to the operation or alteration of the field. Krause writes: "The most controversial debates concerning humanitarianism today are not about the relative weight of humanitarian as opposed to other considerations; they are about who or what is legitimately humanitarian."[52] Following Bourdieu, the structure itself, definitions, and identities are always at stake in the struggle over the field.[53] Self-regulation is thus self-representation: through codes and technical standards, humanitarians are exercising performative agency to rewrite the humanitarian script—to specify its goals (or plot), the leading actors, and the discourse of relief. The internal organizing function is at least as important as the external signaling effect.

In the case studies that follow, I find that reformers invoked the specter of crisis to marshal support for rule-making. Through self-regulation, they sought to recast the field of humanitarian action, and thereby to update the sources of its legitimacy. Caring was no longer enough. But how to proceed? Legitimacy is not a singular concept, in the sense that multiple actions and orientations may confer it, and different sources carry different weight depending on context and audience. Ossewaarde et al. distinguish among *normative* (moral claims), *regulatory* (rooted-ness in international law and rules), *cognitive* (expertise), and *output* (proof of impact) legitimacy.[54] The perception that good intentions are no longer enough is an argument that normative legitimacy alone is an insufficient basis for action. Through self-regulation, humanitarians have bolstered their normative legitimacy through reference to international law, technical expertise, and claims of effectiveness.

Methodology

The universe of potential cases is large and growing; humanitarians implement more than 100 standards, while scores more can be found at national and local levels.[55] These initiatives vary widely; voluntary and unenforced standards like the Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief ("the RC/NGO Code of Conduct") coexist with institutionalized mechanisms like the Core Humanitarian Standard, which ensures compliance through third party audits and member certification. Few domains of humanitarian practice are untouched by self-regulation.

This essay investigates two self-regulatory initiatives: the Sphere Project and the Code of Conduct on Images and Messages. The Sphere Project was the first attempt to create universal standards for humanitarian relief operations and remains the largest self-regulatory undertaking. This case provides a basis for investigating the relationship

between external regulatory stimuli and internal activism, given that prior research on Sphere has tended to highlight donor criticism of NGOs in the aftermath of the Rwandan genocide. In addition, the contingency of Sphere's formulations of quality and professionalism is investigated in light of the controversies surrounding the initiative's development. The Code on Images differs on two key dimensions. First, whereas Sphere occupies the gravitational center of the humanitarian field—it incorporates the largest agencies and addresses the core of emergency response—the Code is peripheral, pertaining largely to European NGOs and their advertising portrayals while experiencing its fullest articulation in Ireland. Second, compared to Sphere, the Code's proponents were also subordinate *within* their organizations. From a selection standpoint, then, an analysis of the Code on Images tests the broader validity of my explanatory framework, which contextualizes the work of humanitarianism's regulators within a generalized crisis of legitimacy in the field. Together, these two cases allow for an assessment of the origins and objectives of self-regulatory initiatives. If my argument holds, the studies should demonstrate the combined influence of external stimuli (manifested as a crisis of legitimacy) and internal shapers (yielding the actual regulations), while simultaneously underscoring the competing identity claims around which regulatory debates have crystallized.

I process-trace the development of the Sphere Project and Code of Conduct on Images and Messages through two primary sources of evidence: semi-structured interviews and archival work. Seventy-seven in-depth interviews averaging fifty-seven minutes in length were held between July 2009 and June 2012 with senior personnel engaged in the preparation and implementation of the two standards initiatives as well as with staff at affiliated NGOs, companion standards, and bilateral donor agencies.[56] Each interview was tape recorded and fully transcribed; except where noted, respondents were promised anonymity. Previous research has called for opening up NGOs to investigate processes, as well as to study how legitimacy claims are reflected internally.[57] In this way, the interviews gain deeper understanding of the motivations underlying the creation of humanitarian standards and explore key issues that arose during the drafting and implementation stages. Interviews are not value-neutral, of course; polling on morality consistently finds that individuals over-report normatively acceptable activities like churchgoing and charitable giving and so too is it reasonable to expect NGO staff to overvalue principles and overstate their own role in self-regulation.[58] I have compensated for this phenomenon by incorporating a range of perspectives and positions from the humanitarian field, from regulatory proponents to critics to donor agencies, including six interviews with U.S. and European institutional donors. At the same time, following Butler, I recognize that speech acts are themselves exercises of performative power or, as Chouliaraki phrases it, "communication [is] constitutive of the social."[59] The discursive justifications given in interviews are part and parcel of the self-regulatory performance—they are an aspect of the self-representation I seek to investigate.

Semi-structured interviews were combined with qualitative analysis of archival materials, including meeting minutes, correspondence, internal studies, and annual reports. Portions of this material were available from extensive online archives, and I also benefited from documents accessed during site visits and provided by interview participants.

The Sphere Project

The Sphere Project is the largest humanitarian self-regulatory initiative, having involved hundreds of organizations and thousands of individuals since its launch in 1997.[60] Practitioners have called it the "most ambitious attempt to improve performance and accountability across the humanitarian aid sector" and a phenomenon "unique in the humanitarian world."[61]

Sphere represents the first attempt to create globally applicable minimum standards for the provision of disaster relief, and is based on the belief, "first, that those affected by disaster or conflict have a right to life with dignity and, therefore, a right to assistance; and second, that all possible steps should be taken to alleviate human suffering arising out of disaster or conflict."[62] Its most recognizable output is its 406-page handbook, the *Humanitarian Charter and Minimum Standards in Humanitarian Response*, which seeks to compile the combined knowledge and principles of the sector in the form of standards for disaster relief. Sphere has neither signatories nor members nor enforcement mechanisms. Consequently, agencies that implement Sphere do so voluntarily; branding appears to play only a small role attracting organizations to Sphere.[63] Implementation is supported by the Sphere head office and Board, located in Geneva as well as by a network of trainers and agencies.

This section investigates factors underpinning the development of the Sphere Project through interviews—including with most of the first management committee, several generations of Project staff, a sample of Board members, ECHO and USAID representatives, and aid workers from agencies in the United States, United Kingdom, Ireland, France, Denmark, and Switzerland—and archival research. While acknowledging donor involvement in the process, I find that Sphere arose out of a crisis of legitimacy, crystallized by the Goma response, which provided rhetorical tools whereby Anglo-American aid veterans articulated a new—rights-based and technically proficient—mode of action.

Origins: Experiencing Goma and Humanitarianism's Crisis of Legitimacy

Rwanda. Two decades after a genocide in which 800,000 Tutsis and moderate Hutus were slaughtered, after a refugee crisis that displaced two million more, the state's name remains a proxy for the failings of multilateral organizations. In the words of United Nations force commander General Roméo Dallaire, "Rwanda will never, ever leave me. It's in the pores of my body."[64] The same could be said of many humanitarians. In a field historically defined by crisis, the Rwandan genocide and its aftermath stand out.

From a humanitarian standpoint, the genocide itself was secondary to the refugee flight that followed the end of hostilities in July 1994. Few humanitarians—the UN, ICRC, and MSF were noteworthy exceptions—had been active inside Rwanda. With the fall of Kigali to the Rwandan Patriotic Front, 850,000 refugees crossed the border into Goma, Zaire, in just five days. For an international community facing condemnation for its inaction during the genocide, the refugee crisis and accompanying water and sanitation problems were a means to assuage collective guilt.[65] The humanitarian response was unprecedented; 170 agencies were funded to the tune of $1.4 billion.[66] Humanitarians were also, in many ways, overmatched. Approximately fifty thousand

refugees died from disease and violence in the first month, the sector struggled to assess needs, and refugee camps were militarized by extremists. Thus, despite some impressive results, post-intervention evaluations concluded that there were areas where "performance of the system was less impressive and the performance of some agencies was poor," citing unprofessional and irresponsible behavior that wasted resources and "may also have contributed to an unnecessary loss of life."[67] Rwanda, one of the Sphere drafters reflected, "was just cathartic. I think everybody who was involved in it has images in their mind which just haunt them every day. Images of the savagery that you saw, and images of our failure as individuals to really do enough."[68]

In the aftermath of the genocide and in the midst of the refugee crisis, the international community attempted to digest the lessons learned from the response. For humanitarians, the most important study was undoubtedly the Joint Evaluation of Emergency Assistance to Rwanda (JEEAR), an innovative and far-reaching multi-actor process. Published in March 1996, the JEEAR placed blame for the failings "within the political, diplomatic and military domains rather than the humanitarian domain."[69] In addition, it called for self-managed humanitarian regulation and the implementation of an international accreditation system. In light of the JEEAR recommendations, the Sphere Project is frequently portrayed as a response by humanitarians to donor pressure. As Van Dyke and Waldman note in an independent evaluation of Sphere: "this perceived pressure from the donors made it more urgent for the NGOs to develop their own set of standards—they preferred to regulate themselves rather than have regulation imposed."[70]

In actuality, donor and public influence was subtler than generally portrayed. The JEEAR process was formative for Sphere's key figures, certainly, but the evaluation functioned less as a transmission vehicle for explicit state preferences than as a permissive environment in which humanitarian reform was made conceivable. As was put to me by a veteran of the British sector, it was a "hollow threat," the premise that states would impose regulations.[71] In two separate interviews, European donor representatives confirmed that while they warmly welcomed efforts to improve humanitarian practice—"the time of amateurs is over," as one put it—they had "neither an appetite nor the political will" to develop their own standards.[72] Rather, Sphere's drafters always perceived their work as essentially internally driven, an impression corroborated in written accounts by key members of Sphere's first management committee.[73] The Steering Committee was inclusive of UN agencies and major NGOs, while Teams 3 and 4, which produced the humanitarian recommendations, were composed of specialists drawn from within the humanitarian community. As John Borton, who headed Team 3, explained to me: "To convey the sense that the JEEAR was 'representing donor interests' or was somehow 'external' to the humanitarian community would, I feel, be wrong."[74] What the JEEAR provided was a powerful example of a large scale, collaborative process. Thus, Sphere staff recalled: "The Rwanda situation gave opportunity to all of these people to sit together and say, 'Hey look, we've been talking about this for a long time.' So it gave that forum."[75]

The ideas that informed Sphere had been percolating since the early 1990s. The "Standards Project," as it was then called, was first proposed by Peter Walker (IFRC) and Nick Stockton (Oxfam) in February 1996, *prior* to the publication of the JEEAR

reports. They were inspired by the 1994 RC/NGO Code of Conduct, a code of principles penned by Walker and Oxfam's Tony Vaux. Despite wide uptake, the Code was aspirational and the concern was that the professionalization process it had stimulated was stalling.[76] Sphere emerged out of the Steering Committee for Humanitarian Response's desire for a "practical expression of the Code of Conduct."[77]

The Joint Evaluation served two major functions. First, it provided a model of an inclusive approach to humanitarian reform. Sphere ultimately borrowed aspects of the JEEAR process, including the management committee concept and teams of researchers. The first management committee consisted of respected, veteran aid workers drawn from major agencies. Walker and Purdin, both members of this team, have written that Sphere's core group "understood and trusted each other, even if they did not always share the same views" and "became a close-knit group who all felt they had a personal stake in making the Sphere process work."[78] Sphere staff suggested that "you had the right people in the right place at the right time."[79] Second, the fallout from the Rwanda and Goma interventions helped create a sense of urgency within the NGO community. The public attention paid to humanitarianism in this period gave the burgeoning Standards Project a boost. Voices favoring the development of standards, including the drafters of Sphere, were able to point to the Goma experience and to invoke the specter of state involvement as a means of building consensus. But these pressures were often more diffuse than specific. One of the proponents of the contemporaneous Humanitarian Ombudsman Project put it thus: "There was the argument that if we don't create standards, states will impose them, but I remember thinking at the time that they won't—they won't bother."[80] Rather, Goma crystallized for many in the field the perception that humanitarianism was in crisis amidst growth, competition, and politicization.

Sphere was thus fundamentally a response to a *crisis of legitimacy* in humanitarianism, namely the belief that good intentions were no longer sufficient as a basis for action and the realization that relief assistance could have both a positive and negative impact on affected populations.[81] The normative environment had shifted; the fear was that humanitarianism itself was at risk of being seen as illegitimate. The International Federation of the Red Cross writes: "Increasingly, in the late 1990s, agencies working in emergencies have been battered by accusations of poor performance, and depicted as competitive corporate entities driven more by funding than humanitarian imperatives . . . Charity's role was challenged. The problem was less one of compassion fatigue as of compassion discredited."[82] As a Sphere Board member explained to me, "the lack of legitimacy of the sector was an issue."[83] He was not alone; the words "legitimate" or "legitimacy" were used thirty-six times across forty-one interviews. With Sphere, agencies started to shift their focus from motivations to end results; this is reflected in the Sphere handbook's emphasis on the "do-no-harm" principle.

Humanitarian Techniques: Professional Performance

Sphere was born of a belief that, to quote from its training materials, "practices that have been carried out in the past are no longer enough."[84] In these kinds of claims, Sphere and its proponents sought to challenge humanitarianism's traditional ethical justifications, namely deontological understandings of aid as inherently good,

and thereby create space for dialogue, debate, and reform.[85] The prevailing "act now, question later" model "couldn't be justified anymore," I was told, and "something more rigorous was needed."[86] That something was Sphere. Sphere harnessed technical guidelines in the service of new understandings of proper practice. Humanitarianism was re-scripted in two ways: first, through Sphere's framework, which reformulated emergency relief as a professional, regulated, and technically proficient endeavor; second, in Sphere's ethical sources and justifications, bolstered through human rights and international law.

First, Sphere both reflected and reinforced a shift in humanitarian identity, from a volunteeristic and charity-based model to rule-guided professionalism. According to Sphere leadership, the move to develop standards was "another positive step in making the humanitarian sector more professional and more effective."[87] In the words of a former Project training manager, Sphere signifies that "the humanitarian community has matured since the days of the stereotypical 'aid cowboy.' References to analysis, capacity-building and participation throughout the handbook reinforce this depth and maturity."[88] To adapt Givoni's insights on reputation management, Sphere's technical standards are a humanitarian *technology* pitched as reformed and (statistically) informed intervention, or, in other words, a claim to cognitive legitimacy—to professional expertise—to bolster declining normative legitimacy.[89]

Sphere publications consciously situated the Project in professional trends and in interviews its leading figures constantly referred to professionalism.[90] For instance, a Project staffer explained to me that the Rwanda evaluation had "put in evidence that there was a gap in professionalization," while a former project manager framed Sphere as a "framework for professionalizing the sector."[91] These perceptions were shared by Anglo-American practitioners, as I found in interviews at aid agencies in the United States and Europe. Examples include a program manager at a major American NGO who praised the Sphere-driven shift from "old guard amateurism" and a counterpart at an Irish NGO who deemed Sphere "an enormously useful framework for professionalizing our humanitarian response and moving away from the notion that good intentions are enough."[92] In total, "profession," "professionalism," and "professionalization" were invoked 107 times in forty-one interviews with Sphere and NGO staff.

Second, Sphere was the first major initiative to openly advocate for a rights-based approach (RBA) to humanitarian assistance. This reflected a concern that the basic human rights of those in crisis and conflict were frequently not upheld. As one of its drafters noted, "we always thought about it in terms of entitlements—what should victims be entitled to expect in terms of competence from agencies?"[93] Sphere's independent evaluation noted that this was an "important revision of the traditional basis of relief," in that assistance is reformulated as an obligation, not as an act of kindness. "Only assistance that allows those affected by disasters to re-establish a 'life with dignity' is acceptable; good-hearted generosity and charitable contributions may be necessary, but they are not necessarily sufficient." Thus, the evaluation continues, "to many of the framers of the Project, the adoption of a rights-based approach to humanitarian assistance represents a fundamental and drastic revision of the philosophy underlying emergency relief that prevailed prior to 1994."[94] Though new to humanitarianism, RBA had already gained traction among development organizations, with

Oxfam and CARE among the first to adopt its principles.[95] In this way, humanitarianism's crisis created opportunities for the importation of ideas from cognate fields, while simultaneously underscoring the growing influence of NGOs in a field long dominated by the ICRC.

Rights-based elements, which include accountability, empowerment, and participation, are present throughout the Charter and Standards, while each chapter draws explicit links to relevant legal conventions. For instance, Chapter 2, on water, sanitation, and hygiene, asserts that "everyone has the right to water and sanitation" and that the right to water is "inextricably related to other human rights," including the right to health, housing, and adequate food. Sphere's claim, which I understand as a claim to regulatory legitimacy, is that its standards contribute to the "progressive realisation" of human rights globally.[96]

Thus, far from being a mere technical guide—a collection of the humanitarian acquis—the launch of Sphere represented an attempt to enact a new humanitarian identity. In the Sphere vision, humanitarianism must break from its amateurish, charitable past to embrace rules, professional standards, and human rights. James Darcy, who led drafting of the Charter, writes that though Sphere provides some basis for judging agency performance, its "more important function is arguably to provide a basis for defining a common agenda and a set of criteria for gauging collective performance."[97] This ambition is illustrated in statements drawn from the Project's own publications over the years:

- Sphere has "the task to define a principled and practical framework for humanitarian action;"[98]
- The Minimum Standards are "relevant to everyone with a legitimate claim to assistance in disaster situations;"[99]
- "Sphere needs to continue to transform itself from a project into the core of civil society;"[100]
- And, the sector should "adopt Sphere as its collective heritage."[101]

To these ends, Sphere and its proponents have actively sought to promulgate both the Sphere handbook and the professional practices it legitimates—to ensure, as I outlined in Section I, that its humanitarian script is actively performed across the field. The Sphere handbook quickly became Oxfam Publishing's highest ever seller, the result of determined promotion on the part of the Sphere head office, and evaluations have consistently found that the handbook is known, used, and esteemed across the field. For instance, the extensive Joint Standards Initiative survey found Sphere to be the most frequently implemented humanitarian standard, used by 88 percent of respondents and considered "always" or "very often" useful by 80 percent of them.[102] Such studies convey the uptake of the Sphere Standards, while Sphere's own promotion of these statistics both bolsters its own legitimacy and creates social pressure on those humanitarians who have not yet implemented Sphere.

The Sphere office has sponsored thousands of events since its launch, including joint field operations, evaluations, and trainings. Evaluations, and the ensuing reports, provide best practices and models for organizations to emulate. As for trainings, self-regulation is individualized through teaching and role-playing; aid workers are

socialized, their identities reshaped. Sphere has eagerly embraced its pedagogical mission, training between five thousand and nine thousand humanitarians each year for which data is available.[103] Trainings are critical for informing aid workers on the deeper sources of the handbook—for making Sphere "real," as a former Sphere training manager put it.[104] Van Dyke and Waldman found that: "After attending a training course, many reported that they 'finally get it.' What they get is, in fact, an appreciation for the rights-based approach and the particular concepts of humanitarian assistance that underlie the Sphere Project."[105] Training, then, is induction into the Sphere way of thinking, but not just thinking. Sphere's technical indicators are a script that guides *practice*, and its performative elements were illustrated to me by a Sphere trainer who explained (then demonstrated) the first thing he does on any field visit: he finds the Sphere handbooks and stands them on their spines. If they open, he knows they have been frequently used; if the spines are unbroken, he knows that more training is required.[106]

Sphere was not inevitable. Its proponents were well placed in the field, but alternative models of humanitarian action exist and the reform outcome was contingent and contested. Notably, Sphere received hostile reception from a set of largely francophone agencies, including MSF and Groupe URD. Two points bear on this discussion.

First, Sphere critics and proponents alike recognized that good intentions were no substitute for professionalism. As Groupe URD's Dufour et al. acknowledged, "Il ne suffit pas de faire le bien, il faut le bien faire (It is not enough to do good, it must be done well)."[107] MSF even participated in the first phase of Sphere out of a "responsibility to transmit our technical experience."[108] However, and second, the recognition that something must be done did not translate into consensus on reform. Sphere's French opponents raised a series of substantive criticisms about the Project, including concerns that its technical standards would displace humanitarian principles, that its legal interpretations misplaced responsibility and provided states a means of co-opting NGOs, and that alternative courses of action (or inaction) and immeasurables, such as solidarity and compassion, would be sidelined.[109]

Leaving aside the substance of these critiques—for which there is some evidence—the criticisms collectively reflected deep concerns over "the very foundation of Sphere's approach" and a certain ambivalence with self-regulation, in general.[110] For Sphere's opponents, the Standards were seen as prescriptive and inattentive to context. It was frequently said that Sphere's measures only applied to "ideal situations in relief camps" and, worse, that they could impede adaptation in more complex situations, where experience and professional acumen alone were sufficient.[111] As an MSF-Belgium staffer characterized it, Sphere's "dogmatic framework" was at odds with MSF's medical approach, as "diagnoses vary from situation to situation; every context is different."[112] MSF-UK's Jacqui Tong attributes these controversies to the different "philosophical underpinnings, different political and cultural origins and typologies of NGOs."[113] MSF's Dunantist (confrontational and independent) tradition contrasted with Sphere's essentially Wilsonian (collaborative and developmental) approach. Opponents claimed that their arguments "reflect the views of part of the humanitarian community which is equally rooted in the field and strongly

inspired by the ideal of Henri Dunant."[114] The *content*, not the desirability, of professionalization, was at stake.

This was a battle for position in the humanitarian field; the rhetoric reflected the material consequences implied by a shift in the relative values of particular types of capital—from judgment and adaptability to managerial professionalism and rule-implementation. Groupe URD's own quality initiative, Projet Qualité, was created "in direct opposition to Sphere and the Ombudsman project" and emphasizes context and learning.[115] A key figure at URD recalled: "It *was* a bit of a *lutte* [struggle]. It was a *lutte* between two philosophical approaches and two scientific approaches."[116] It is thus highly symbolic that a team of Sphere trainers and the Project office helped commemorate the 150th anniversary of the Red Cross Red Crescent movement at the site of the Battle of Solferino.[117] The act of commemorating the birth of modern humanitarianism by showcasing Sphere's technical standards and indicators is indicative of the shift in aid work from Dunant's simple moral compulsion to technique and professionalism.

The Code of Conduct on Images and Messages

In the second case study, I investigate the Code of Conduct on Images and Messages (henceforth, "the Code on Images" or "the Code"), a code of principles developed in the United Kingdom in 1989 and resurrected and revised at the European level in 2007 by a group of Irish development educators. In Ireland, as of March 2018, the Code has 107 signatories. At the EU level, it is left to national platforms to devise models for promotion and adoption. This study focuses on the situation in Ireland, where the Code has experienced its greatest development. In addition to archival research, this section includes insights from interviews with the British drafters of the 1989 Code, nearly every member of the Dóchas (Ireland) "code working group," Dóchas staff, a range of European development educators and fundraisers, and donor (Irish Aid) representatives. I also participant-observed several Code implementation meetings between 2009 and 2014.

The Code on Images was written by NGOs in the areas of emergency relief, development, and development education (Dev Ed) and applies to images and messages used to *inform* (media and education), to *sell* (marketing and fundraising), to *convince* (advocacy and policy), and to *account for* (reporting).[118] It is intended as a framework on which organizations can build when designing and implementing their communications strategies. The Code's goal is that organizations "portray the reality of the lives of people with sensitivity and respect for their dignity," that "images and messages should seek to represent a complete picture of both internal and external assistance and the partnership that often results between local and international NGOs," and that organizations "avoid images and messages that potentially stereotype, sensationalise or discriminate against people, situations or places."[119]

As a principles-based initiative, the Code on Images is organized around broad statements of values. Consequently, the "Guide" to the Code notes, it is "not a prescriptive check-list of 'correct' and 'incorrect'" but instead seeks to create a mindset and ethos within agencies.[120] Signatories commit to several actions. They must *announce* the Code (in communications and online), *institutionalize* the Code

(through assessments, trainings, and contracting guidelines), and *account* to the Code (via feedback mechanisms and annual reports). In Ireland, the Code has been progressively strengthened, including the launch of a complaints mechanism through Dóchas, the Irish Association of Non-Governmental Development Organisations.

In Ireland, Dóchas played a central role in the drafting of the Code of Conduct and remains a focal point in pushing implementation and shaping interpretation. Dóchas has organized numerous trainings, convened annual workshops, and produced supporting materials, including publishing written and illustrated guides to the Code. To be a member of Dóchas, NGOs are required to sign the Code on Images and report yearly on implementation. At the European level, the Code has been promoted through DEEEP, which is the Dev Ed coordinating structure within CONCORD. CONCORD is the European NGO Confederation for Relief and Development, representing more than 1,600 NGOs. National platforms are given considerable leeway on how they implement the Code.

The Code on Images is a peripheral case. Whereas the Sphere Project comprises the largest actors in the field and is supported by key networks and donors, the Code is ultimately the product of a small group of committed actors operating largely outside of institutional and organizational centers of power. Nevertheless, the circumstances of the Code's birth evoke in striking ways key themes elaborated in this essay: its drafting occurred in a context of organizational growth and change; its framers recognized quite clearly that the era of good intentions was coming to an end and sought to develop a principled code of practice. Consequently, though peripheral to the field's gravitational centers, the Code on Images testifies to the widespread nature of the changes to humanitarianism and the cross-sectoral spread of self-regulation.

In addition, I find that the Code on Images, like the better-known initiatives, has had specific ideational functions in the field—functions that extend beyond the letter of its codes and commands. Though directed specifically at image and message production, the Code is also, more generally, a statement on the proper practice of aid and development. Specifically, it is an effort by development educators to provoke discussions in Ireland and Europe as well as within their own organizations on the place of principled action in a field increasingly dominated by fundraising considerations.

Origins: Starvation Imagery

Efforts to regulate humanitarian representations date to the aftermath of the famine in Ethiopia in 1984–1985. The Ethiopian crisis was a watershed, a televised human drama that elevated aid and development from a sideshow into a meaningful topic of public concern. Galvanized by Michael Buerk's on-the-scene reports for the BBC, popularized by the Band Aid charity single and Live Aid concerts, global awareness of and funding for humanitarian action reached hitherto unseen levels. This attention came at a cost, however; media coverage relied on simplistic narratives and dire, even apocalyptic, visuals of human suffering. The effects of these disaster images were highlighted in a major UN/European Community project called "Images of Africa." The final report, written by Oxfam's Nikki van der Gaag and Cathy Nash, found that while Ethiopia "was not the first time that the media had used such images

. . . The fact that this time the famine images became the currency of the media and the NGOs created a particular public consciousness of Africa."[121]

The "Images of Africa" project provided space for aid workers, and British development educators specifically, to contemplate the impact of images on perceptions of the developing world. The overwhelming impression, recounted to me by one of the project group, was that the imagery used to portray the Ethiopian famine had "actually set back development in a number of ways . . . We were shocked by what we had found."[122] *Shock*—not fear of external regulation, not concern for survival in a competitive marketplace—shock was the word used most often (in six different interviews) to convey the moral opprobrium felt by development educators following the famine response. In 1989, just two years after the "Images of Africa" report and four years after Live Aid, British development educators released the Code of Conduct on Images and Messages Relating to the Third World. The Code challenged humanitarian organizations to enact their values publicly through their communications and advertising.

The Code was innovative—one of its founding figures called it "the first code of conduct, per se, that I can remember"—but institutionally weak.[123] Despite early success raising awareness and though several major agencies adopted internal guidelines, the Code lacked a secretariat or focal point; by the mid-1990s, it was moribund. As the Code faded from view, the feeling grew among its supporters that portrayals of the developing world "had slipped back towards the 1984 apocalyptic-type images."[124]

In Ireland, ongoing discussions in Dóchas' Development Education Group culminated in the decision, in 2004, to propose a new Code of Conduct at the European Union level.[125] The Code was revived, but also significantly *revised*; an abbreviated name—the Code of Conduct on Images and Messages—reflected tightened prose and updated language. More significantly, while figures from the 1989 Code were consulted, the 2004 revisions were largely a distinct process. As a veteran of the "Images of Africa" era explained, "the movers and shakers behind the 1989 Code have mostly moved on."[126] The original initiative nonetheless loomed large in the thinking of the Irish contingent, both as an inspiration and as a cautionary tale: leaders in Dóchas' "small, close knit" group recognized that the vitality of their movement depended on institutionalization through Dóchas, much as Sphere learned from the failings of the Red Cross/NGO Code of Conduct.[127]

As in 1989, the revised Code emerged out of a largely principled critique of the nature and impact of NGO and media communications. Asked to recount the factors contributing to their decision to regulate images and messages, those in Ireland's NGO sector spoke at length of the disconnect between public portrayals of aid and the principles that motivated their work. As one outspoken development educator put it: "What really struck me was that I saw images of black babies with flies actually flying around their faces. Major organizations! And those are the images that really portray the whole continent . . . The language used is very paternalistic."[128] Key figures downplayed the prospect of donor regulation of images, emphasizing, as one Irish regulatory expert put it, that "the driver for the Code was pretty much coming from within the sector."[129] Code proponents *were* attuned to shifting public perceptions of media, though, and two even cited Kate Manzo's research in interviews as a way of

bolstering their case for regulation. At least some in the Development Education Group felt that public attention would have strengthened their position.[130]

Envisioning Ethical Practice

At first glance, I have noted, the Code of Conduct on Images and Messages appears as a peripheral initiative. Its origin is more clearly connected to development education; it has found its fullest expression in Ireland rather than in the NGO centers of the United States, the United Kingdom, Switzerland, and France. This peripherality is deceptive.[131] The Code arose in a similar macro level context as other initiatives, one characterized by growth in the field, professionalization, and bureaucratization. A 2007 Dóchas study found that 57 percent of its members had been established since 1980, while existing organizations were increasingly bureaucratized and interconnected.[132] Reflecting on the changes in Ireland, a member of the Code Working Group explained: "There was a time when people who were working in the development sector were driven by passion, or by this 'thirst of social justice.' . . . But now I think, more and more—I don't know if it's because now it's more formalized and professionalized . . . Charities are run like a multinational, especially the big ones like Concern. There are objectives there."[133] These changes bolstered an overwhelming sense among the Code's drafters that the Irish NGO sector was undergoing an evolution. "Traditionally, in Ireland," one of the key figures reflected, "most of the legitimacy is founded around that particular distinctive feature of a non-profit: the volunteerism, the volunteer board, and so forth . . . After a certain point, that's not enough as a basis for giving or asking. It isn't sufficient. It was necessary to move from that to something that was more accountable and independent."[134] Another Irish aid worker noted that the public is "increasingly questioning the legitimacy and the credibility of NGOs, so in terms of enhancing legitimacy, codes are quite important."[135] It was apparent among Irish NGO staff that "good intentions are no longer enough."[136]

Though Irish NGOs had largely escaped criticism, there was a realization that this would not last. As Dóchas itself acknowledged, the view of NGOs as efficient and effective service deliverers was no longer accepted on faith; "increasingly such claims are being questioned . . . What seems clear is that the age of blind faith in any institutions is over." Consequently, many saw greater accountability, including self-regulation, "as a means of raising their legitimacy and credibility among key policymakers and thus the effectiveness of their work."[137] Siobhán McGee, the consultant hired by Dóchas to research the Code, has observed that charity regulation in Ireland has not come in the wake of scandals or even public discontent with nonprofit fundraising. Rather, it can be seen "as a preemptive move, reflecting the fact that changing times require more advanced approaches to accountability, and as an attempt to protect the existing high levels of goodwill and trust towards the sector."[138] For Dóchas, as for its members, the Code of Conduct on Images and Messages was a step toward greater accountability, professionalism, and credibility.[139]

Thus, while the Code on Images was explicitly concerned with images and messages, it was simultaneously a way to re-articulate the sector's identity. This point bears emphasis: to the extent that Irish NGOs experienced public pressure, it was perceived as a general unease about credibility or performance, *not* about imagery.

Development educators latched onto these perceptions, though, to promote ethical messaging as *the* response. To regulate imagery was to be professional; responsible organizations were those who enacted their principles through their media offerings. Kate Manzo has argued that images of children and shared codes of conduct are "both means through which NGOs produce themselves as humanitarian. These NGO codes are neither simple reflections of common practice nor signs of uncontested identity. Rather, they are integral to a larger discursive apparatus through which humanitarian identity in general is constituted, revised, and reaffirmed."[140] I agree. Dóchas has stated that the Code was designed as an expression of core NGO values and principles, such as human dignity, respect, and truthfulness. In interviews, proponents explained that the Code is "about communicating our values" and a "kind of tool to really make it happen for the values that we're talking about, because we're always reminding people that we are the value-based organizations, and that we have our mission, and we have respecting human rights."[141] Self-regulation is also self-*representation*.

Like the Sphere Project, the Code of Conduct on Images and Messages expresses a rights-based identity for the field. It is driven by a strong commitment to dignity, equality, and the promotion of fairness, solidarity, and justice.[142] Its "Illustrative Guide" explicitly connects the Code to the Convention on the Rights of the Child. Rights-based values are deeply embedded in Ireland, having been actively promoted among NGOs since the early 2000s. As a Code Working Group member observed, "I couldn't think of an organization within Dóchas that doesn't have a rights-based framework."[143] This framework actively shapes understandings of appropriate behavior: the 2010–2012 review of the Code observed that practitioners identified words like "charity," "saving," and "assistance" as "bad practice" or "grey area practice." On the flip side, "good practice" messages included words like "justice," "empowerment," and "working with."[144]

Good practice, thus defined, has been promoted and incorporated in the Irish field through a mixture of events and trainings, as with Sphere, and similar logics of socialization apply. At the several events I observed, I experienced dynamics of *teaching* on the Code, presentations by Code signatories on methods and models to *emulate*, and experiential (*role-playing*) breakout sessions. The context was always friendly and supportive, though not without social pressure; a segment of each gathering was devoted to presenting facts and figures on field-wide implementation. A Dóchas administrator explained to me that the goal of the trainings is to "change mentalities and practices" and to embed "the spirit of self-reflection."[145] Dóchas materials serve a similar didactic purpose. The 2014 Illustrative Guide provides practical examples of good practice: each of the seven core commitments is explained and illustrated with a "recommended" and "not recommended" image.[146] To the extent that humanitarian principles are performed through the media environment, as Chouliaraki argues, shifting aesthetics also signal shifts in humanitarian identity.[147]

Like Sphere, then, the Code's drafters sought to promote change in the humanitarian field, which they pursued at the national level (via Dóchas) and in Europe (via DEEEP). Unlike Sphere, however, these reformers were generally *not* centrally positioned in their agencies. The Code on Images was thus *also* an effort by the Dev Ed community to provoke an intra-organizational discussion with fundraisers over the

principles guiding aid work. From the outset, it was accepted that diverse perspectives within NGOs reflected a "key challenge of achieving coherence within NGOs" and that the Code on Images gave "an opportunity and a responsibility . . . to facilitate and ensure a meaningful debate occurs."[148] Development education is traditionally peripheral in many organizations. A British DEEEP member explained: "If development education takes an initiative, it's often a lot more difficult to push that initiative through, even if it is based on absolutely sound ideas, than if you came from the inner sanctum of an NGO, like the policy department, or the international division. Development education is always seen as a bit of a troublesome program within NGOs."[149] Thus, for the Dev Ed cohort, the Code was an advocacy tool. Said a staffer at a large Irish NGO: "You can come with your Code of Conduct to your colleagues and say, 'You know, this is something that the organization as a whole has signed up to.'"[150]

In nearly every interview I conducted, the divide between fundraising and development education emerged, often unsolicited.[151] The divide is often framed as a battle between values and organizational imperatives. Ruth Gidley puts it as follows: "Whenever a sudden disaster strikes, aid agencies face a quandary—how to tug at donors' heartstrings with powerful images without breaking self-imposed rules about portraying survivors with dignity?" The claim from fundraising is always that "softer images don't bring in the money."[152] An Irish development educator called this an "unthoughtful argument," the claim that only "bad images raise money."[153]

This divide ultimately stems from two different understandings of humanitarian action. On the one hand, development educators see themselves as representing a humanitarian identity rooted in values like humanity and partnership. On the other, fundraisers frequently enter the field socialized in business and marketing values; they speak the language of efficiency, transparency, and growth. A member of Dóchas's Code Working Group reflected that its guidelines were written with the fundraiser and communications person in mind. "Realistically," he said, "every Development Education person is going to be converted already—you assume that they're all going to be attracted by the idea that people's dignity, respect for the people, matters more than how much money you'll bring in. Whereas it's fairly intuitive that a fundraiser will say, 'Well, no, we can't raise funds because we can't do any work without these images.'" Consequently the Code was written "to challenge them, to say, 'Actually, you need to do this.'"[154] As another proponent acknowledged, it "could be seen as a kind of preaching to practitioners of fundraising."[155]

Conclusions

This essay investigated recent innovations in humanitarian governance. It found that self-regulation has emerged out of a crisis of legitimacy, whereby aid veterans concluded that good intentions were no longer enough as a basis for action. Through performance standards, these aid workers have sought to shift humanitarianism's ideational underpinnings from charity and good deeds to professionalism, technical proficiency, and human rights. Humanitarianism has been re-framed. But these changes have not gone uncontested. In challenging standards like Sphere and the

Code on Images, critics have in turn advanced alternate visions of humanitarianism and its practice.

The fervor for standards shows little sign of diminishing. The year 2014 brought the launch of the Core Humanitarian Standard on Quality and Accountability and with it the alliance of Sphere, HAP International, and People in Aid, the three largest humanitarian self-regulatory standards. Despite occasionally antagonistic histories, the merger of these three initiatives may yet signify the realization, twenty years after the Goma camps, of a coherent approach to humanitarian quality and accountability.[156] But my research has indicated that this move is not cost-free, nor can it be adjudicated by indicators alone. The power to write rules is the power *to* rule, an observation made to me by a Dóchas administrator who, in a nod to *The Lord of the Rings*, dubbed the CHS "one code to rule them all."[157] The fear, raised during the drafting of Sphere, is that an all-encompassing initiative would occupy the gravitational center of the humanitarian field—the largest humanitarian NGOs, save for most sections of MSF, are now members—and squeeze out alternate approaches, particularly approaches less wed to Anglo-Saxon management and accountability traditions. At its core, then, the struggle over standards is not only a struggle *over* quality; it is a struggle to *define* quality and hence to define humanitarianism itself. What is the place of volunteer or amateur action in a professionalizing field? Whose voice matters? And what, ultimately, constitutes best practice? These are some of the questions to which self-regulation responds.

This study, like many it has cited, has focused on northern NGOs, and for good reason. Northern NGOs have written the rules; northern institutions dominate the funding environment.[158] But these northern actors work with and through local partners, and these relationships have intensified in the last decade. Sphere encountered the perception that its rules were imbued with the cultural context of its founders and labored, until the addition of Sphere India to its Board, to meaningfully globalize its voice.[159] This is hardly unique to Sphere. Research in anthropology, for instance, has identified ways in which northern understandings of accountability may unintentionally marginalize local practices, while in international relations, Carpenter has explored the symbolic and material sources of power in NGO networks.[160] There is a clear need for future research to investigate the role of standards in governing the interactions between international NGOs and their local partners, and especially the role of standards in incorporating local actors into systems of humanitarian rule.[161]

Ultimately, for populations affected by war or disaster, the standards to which aid providers adhere may quite literally mean the difference between life and death. As the Goma response illustrated, even the best intentions may yield terrible outcomes. On this, at least, humanitarians are in agreement.

N O T E S

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5. The Joint Standards Initiative reported the use and awareness of at least one hundred standards across the humanitarian community. Lois Austin and Glenn O'Neil, "The Joint Standards Initiative Global Stakeholder Consultation Report," (Joint Standards Initiative, 2013), viii. On self-regulation, see Andrew A. King and Michael J. Lenox, "Industry Self-Regulation without Sanctions: The Chemical Industry's Responsible Care Program," *The Academy of Management Journal* 43, no. 4 (December 2000): 698.

6. Mary Kay Gugerty and Aseem Prakash, "Voluntary Regulation of NGOs and Nonprofits: An Introduction to the Club Framework," in *Voluntary Regulation of NGOs and Nonprofits: An Accountability Club Framework*, ed. Mary Kay Gugerty and Aseem Prakash (New York: Cambridge University Press, 2010), 4. See also Aseem Prakash and Matthew Potoski, *The Voluntary Environmentalists: Green Clubs, Iso 14001, and Voluntary Environmental Regulations* (Cambridge: Cambridge University Press, 2006); Mary Tschirhart, "Self-Regulation at the State Level: Nonprofit Membership Associations and Club Emergence," in *Voluntary Regulation of NGOs and Nonprofits: An Accountability Club Framework*, ed. Mary Kay Gugerty and Aseem Prakash (New York: Cambridge University Press, 2010); René Bekkers, "The Benefits of Accreditation Clubs for Fundraising Nonprofits," in *Voluntary Regulation of NGOs and Nonprofits*; Mary Kay Gugerty, "The Emergence and Design of NGO Clubs in Africa," in *Voluntary Regulation of NGOs and Nonprofits*, 244–50; Michael Edwards and David Hulme, "NGO Performance and Accountability in the Post-Cold War World," *Journal of International Development* 7, no. 6 (November/December 1995): 849–56; Alnoor Ebrahim, "Accountability in Practice: Mechanisms for NGOs," *World Development* 31, no. 5 (May 2003): 819–21; L. David Brown and Mark H. Moore, "Accountability, Strategy, and International Nongovernmental Organizations," *Nonprofit and Voluntary Sector Quarterly* 30, no. 3 (September 2001): 569–87.

7. Patricia Bromley and Charlene D. Orchard, "Managed Morality: The Rise of Professional

Codes of Conduct in the US Nonprofit Sector," *Nonprofit and Voluntary Sector Quarterly* 45, no. 2 (April 2016): 351–74; Christopher L. Pallas, David Gethings, and Max Harris, "Do the Right Thing: The Impact of INGO Legitimacy Standards on Stakeholder Input," *Voluntas* 26, no. 4 (August 2015): 1261–87.

8. Neil Fligstein and Doug McAdam, *A Theory of Fields* (New York: Oxford University Press, 2012), 9.

9. Fiona Terry, *Condemned to Repeat? The Paradox of Humanitarian Action* (Ithaca: Cornell University Press, 2002); David Rieff, *A Bed for the Night: Humanitarianism in Crisis* (New York: Simon & Schuster, 2002); Peter Walker and Daniel Maxwell, *Shaping the Humanitarian World* (New York: Routledge, 2009); Stroup, *Borders among Activists*; Thomas G. Weiss, *Humanitarian Business* (Malden, MA: Polity Press, 2013); Monika Krause, *The Good Project: Humanitarian Relief NGOs and the Fragmentation of Reason* (Chicago: University of Chicago Press, 2014); Jennifer Rubenstein, *Between Samaritans and States: The Political Ethics of Humanitarian INGOs* (Oxford: Oxford University Press, 2015).

10. Michael Barnett and Raymond Duvall, eds., *Power in Global Governance* (Cambridge: Cambridge University Press, 2005), 1; see also Deborah D. Avant, Martha Finnemore, and Susan K. Sell, eds., *Who Governs the Globe?* (New York: Cambridge University Press, 2010); David Held and Anthony McGrew, eds., *Governing Globalization: Power, Authority and Global Governance* (Malden, MA: Polity Press, 2002).

11. Michael Barnett, "Humanitarian Governance," *Annual Review of Political Science* 16 (May 2013): 384. That is, humanitarian governance in terms of codified rules and regulations has scarcely been explored, though Foucauldian accounts of governmentality and biopolitics have been more common. Among others, see Agier, "Humanity as an Identity"; Reid, "Biopoliticization of Humanitarianism."; Didier Fassin, *Humanitarian Reason: A Moral History of the Present* (Berkeley: University of California Press, 2012). Rubenstein's work on political ethics also bears mentioning: ethical predicaments arise from NGOs' quasi-governmental, political, and second-best nature. Rubenstein, *Between Samaritans and States*.

12. Weiss, *Humanitarian Business*, 162; see also Alexander Cooley and James Ron, "The NGO Scramble: Organizational Insecurity and the Political Economy of Transnational Action," *International Security* 27, no. 1 (Summer 2002): 5–39.

13. Walker and Maxwell, *Shaping the Humanitarian World*, 79–92; Stroup, *Borders among Activists*.

14. Agier, "Humanity as an Identity," 34.

15. One World Trust, "A Database of Civil Society Self-Regulatory Initiatives," accessed June 3, 2015, http://www.oneworldtrust.org/csoproject; Austin and O'Neil, "Joint Standards Initiative."

16. Allen Buchanan and Robert Keohane, "The Legitimacy of Global Governance Institutions," *Ethics and International Affairs* 20, no. 4 (December 2006): 405–37; Held and McGrew, *Governing Globalization*.

17. Avant, Finnemore, and Sell, *Who Governs the Globe?*

18. Richard Price, "Review: Transnational Civil Society and Advocacy in World Politics," *World Politics* 55, no. 4 (July 2003): 580–81.

19. Edwards and Hulme, "NGO Performance"; Kim D. Reimann, "A View from the Top: International Politics, Norms and the Worldwide Growth of NGOs," *International Studies Quarterly* 50, no. 1 (March 2006): 45–67; Maryam Zarnegar Deloffre, "Global Accountability Communities: NGO Self-Regulation in the Humanitarian Sector," *Review of International Studies*

42, no. 4 (October 2016): 724–47. On neoliberalism and NGOs, see Stephen Hopgood, "Saying 'No' to Wal-Mart? Money and Morality in Professional Humanitarianism," in *Humanitarianism in Question: Politics, Power, Ethics*, ed. Michael Barnett and Thomas Weiss (Ithaca, NY: Cornell University Press, 2008); Avant, Finnemore, and Sell, *Who Governs the Globe?*

20. On ODA, see ALNAP, "The State," 43. On conflict trends, see Walker and Maxwell, *Shaping the Humanitarian World*, 60–71.

21. Michael Barnett, "Humanitarianism Transformed," *Perspectives on Politics* 3, no. 4 (December 2005): 723–40; Alan Whaites, "Pursuing Partnership: World Vision and the Ideology of Development—a Case Study," *Development in Practice* 9, no. 4 (August 1999): 410–23.

22. Ebrahim, "Accountability in Practice," 820. On competition and expansion, see Cooley and Ron, "The NGO Scramble"; Johanna Siméant, "What Is Going Global? The International-ization of French NGOs 'without Borders,'" *Review of International Political Economy* 12, no. 5 (December 2005): 851–83. On scandal, see Edwards and Hulme, "NGO Performance"; Gugerty and Prakash, "Voluntary Regulation."

23. Even scholars not explicitly adopting the framework tend to position their research vis-à-vis Gugerty and Prakash; for example, Hans Peter Schmitz, Paloma Raggo, and Tosca Bruno-van Vijfeijken, "Accountability of Transnational NGOs: Aspirations Vs. Practice," *Nonprofit and Voluntary Sector Quarterly* 41, no. 6 (December 2012): 201–33; Deloffre, "Global Accountability Communities"; Bromley and Orchard, "Managed Morality"; Angela M. Crack, "Reversing the Telescope: Evaluating NGO Peer Regulation Initiatives," *Journal of International Development* 28, no. 1 (January 2016): 40–56.

24. In their edited volume, Gugerty and Prakash explain that nonprofit scandals—fraud, mismanagement, unethical behavior—impose reputational costs across the board, not just on the wrongdoers, and may attract unwanted attention from state regulators. They explain: "If principals are unable to distinguish between 'good' and 'bad' nonprofits, they may begin to view all nonprofits with more caution, perhaps even suspicion." Gugerty and Prakash, "Voluntary Regu-lation," 9. Not all clubs are made equal, however. The most credible clubs impose clear costs, i.e., they monitor and impose sanctions for non-compliance. Woods Bowman, "Trends and Patterns in Third-Party Accreditation Clubs," in *Voluntary Regulation of NGOs and Nonprofits: An Account-ability Club Framework*.

25. See, respectively, Schmitz, Raggo, and Bruno-van Vijfeijken, "Accountability of Transna-tional NGOs"; Christopher L. Pallas and Amanda Guidero, "Reforming NGO Accountability: Supply Vs. Demand-Driven Models," *International Studies Review* 18, no. 4 (August 2016): 614–34; Alpa Dhanani and Ciaran Connolly, "Non-Governmental Organizational Accountability: Talking the Talk and Walking the Walk?" *Journal of Business Ethics* 129, no. 3 (July 2015).

26. Pallas, Gethings, and Harris, "Do the Right Thing." Büthe et al. find that a humanitarian discourse rooted in need better explains NGO aid allocation than do accounts rooted in effec-tiveness or organizational self-interest. Additionally, in her study of HAP International, Deloffre finds space for collaborative and meaningful donor-NGO regulatory relationships. See Tim Büthe, Solomon Major, and André de Mello e Souza, "The Politics of Private Foreign Aid: Humanitarian Principles, Economic Development Objectives, and Organizational Interests in NGO Private Aid Allocation," *International Organization* 66, no. 4 (October 2012): 571–607; Deloffre, "Global Accountability Communities."

27. Bromley and Orchard, "Managed Morality," 4; Crack, "Reversing the Telescope."

28. This is compounded by the fragmentation of institutional donors; in the United States

alone, sixteen different agencies provide funding, while individuals and foundations provide additional income streams. Stroup, *Borders among Activists*, 37–39.

29. ALNAP, "The State," 11.

30. Wolf-Dieter Eberwein, "Le Paradoxe Humanitaire? Normes Et Pratiques," *Cultures & Conflits* 60 (Winter 2005): 15–37; Rieff, *A Bed for the Night*.

31. Rieff, *A Bed for the Night*; Calhoun, "The Imperative to Reduce Suffering." *Legitimacy*, according to one oft-cited definition, is "a generalized perception or assumption that the actions of an entity are desirable, proper, or appropriate within some socially constructed system of norms, values, beliefs and definitions." Mark C. Suchman, "Managing Legitimacy: Strategic and Institutional Approaches," *Academy of Management Review* 20, no. 3 (July 1995): 574.

32. Jem Bendell, *Debating NGO Accountability*, NGLS Development Dossier (Geneva, Switzerland: UN Non-Governmental Liaison (NGLS), 2006), ix–x; Hugo Slim, "By What Authority? The Legitimacy and Accountability of Non-Governmental Organisations," *Journal of Humanitarian Assistance* (March 2002).

33. Nicholas Leader, "Proliferating Principles: or How to Sup with the Devil without Getting Eaten," *Disasters* 22, no. 4 (December 1998): 292.

34. Personal interview, July 16, 2010 (Dublin).

35. For example, Christian Reus-Smit, "International Crises of Legitimacy," *International Politics* 44, no. 2 (March 2007): 157–74; Michael Barnett and Martha Finnemore, *Rules for the World: International Organizations in Global Politics* (Ithaca, NY: Cornell University Press, 2004).

36. On political opportunity structures, see Reimann, "A View from the Top." On normative entrepreneurs, see Price, "Review."

37. Fligstein and McAdam, *A Theory of Fields*, 10; Yves Dezalay and Bryant G. Garth, *Dealing in Virtue: International Commercial Arbitration and the Construction of a Transnational Legal Order* (Chicago: University of Chicago Press, 1996), 16.

38. Fligstein and McAdam, *A Theory of Fields*, 168–69.

39. Paul J. DiMaggio, "Constructing an Organizational Field as a Professional Project: U.S. Art Museums, 1920–1940," in *The New Institutionalism in Organizational Analysis*, ed. Walter W. Powell and Paul J. DiMaggio (Chicago: University of Chicago Press, 1991), 267.

40. Barnett, "Humanitarianism Transformed"; Krause, *The Good Project*.

41. See, respectively, Walter W. Powell and Paul J. DiMaggio, Introduction to *The New Institutionalism in Organizational Analysis*, ed. Walter W. Powell and Paul J. DiMaggio (Chicago: University of Chicago Press, 1991); Pierre Bourdieu and Loïc J. D. Wacquant, *An Invitation to Reflexive Sociology* (Chicago: University of Chicago Press, 1992); Dezalay and Garth, *Dealing in Virtue*.

42. Fligstein and McAdam, *A Theory of Fields*.

43. Reus-Smit, "International Crises of Legitimacy," 167.

44. Gugerty and Prakash, "Conclusions," 301.

45. Nicholas Onuf, "Constructivism: A User's Manual," in *International Relations in a Constructed World*, ed. Vendulka Kubálková, Nicholas Onuf, and Paul Kowert (Armonk, NY: M.E. Sharpe, 1998), 59–60. Barnett and Finnemore apply these insights to IOs, whose rules "create new categories of actors, form new interests for actors, define new shared international tasks, and disseminate new models of social organization." Barnett and Finnemore, *Rules for the World*, 3. Significantly less attention has been paid to the constitutive effects of NGO rules, though see Deloffre on joint endeavor in accountability. Deloffre, "Global Accountability Communities."

46. Alastair Iain Johnston, *Social States: China in International Institutions, 1980–2000* (Princeton: Princeton University Press, 2008), 488.

47. Fligstein and McAdam, *A Theory of Fields*, 43.

48. Judith Butler, "Performative Agency," *Journal of Cultural Economy* 3, no. 2 (September 2010): 147.

49. Michael Power, *The Audit Society: Rituals of Verification* (Oxford: Oxford University Press, 1999), 9, 91.

50. Givoni labels this "recursive humanitarianism"—that humanitarians are concerned about the efficient delivery of aid as well as its ethical deployment. Michal Givoni, "Reluctant Cosmopolitanism: Perceptions Management and the Performance of Humanitarian Principles," *Humanity* 7, no. 2 (Summer 2016): 255–72. On humanitarian performativity, see also Jeff Everett and Constance Friesen, "Humanitarian Accountability and Performance in the *Théâtre De L'absurde*," *Critical Perspectives on Accounting*, no. 21 (August 2010): 468–85; Lilie Chouliaraki, *The Ironic Spectator: Solidarity in the Age of Post-Humanitarianism* (Cambridge, UK: Polity, 2013).

51. Judith Butler, "Performative Acts and Gender Constitution: An Essay in Phenomenology and Feminist Theory," *Theatre Journal* 40, no. 4 (December 1988): 520. As applied to humanitarianism, see Chouliaraki, *Ironic Spectator*, 49.

52. Krause, *Good Project*, 100. Hilhorst makes a similar point. Dorothea Hilhorst, "Being Good at Doing Good? Quality and Accountability of Humanitarian NGOs," *Disasters* 26, no. 3 (December 2002): 197. See also Bourdieu and Wacquant, *An Invitation to Reflexive Sociology*, 17–18.

53. Bourdieu and Wacquant, *An Invitation to Reflexive Sociology*, 245.

54. Ringo Ossewaarde, André Nijhof, and Liesbet Heyse, "Dynamics of NGO Legitimacy: How Organising Betrays Core Missions of INGOs," *Public Administration and Development* 28, no. 1 (January 2008): 42–53. See also Slim, "By What Authority?"; Barnett and Finnemore, *Rules for the World*; Avant, Finnemore, and Sell, *Who Governs*; Pallas, Gethings, and Harris, "Do the Right Thing."

55. Austin and O'Neil, "The Joint Standards Initiative."

56. This number includes three follow-up interviews conducted in 2014.

57. Schmitz, Raggo, and Bruno-van Vijfeijken, "Accountability of Transnational NGOs"; Pallas, Gethings, and Harris, "Do the Right Thing," 1283.

58. I am grateful to an anonymous reviewer for making this point. On polling, see C. Kirk Hadaway and Penny Long Marler, "How Many Americans Attend Worship Each Week? An Alternative Approach to Measurement," *Journal for the Scientific Study of Religion* 44, no. 3 (August 2005): 307–22.

59. Chouliaraki, *Ironic Spectator*, 49.

60. Thousands of individuals in eighty countries representing more than four hundred agencies fed into the 2004 Handbook. Staff reported even stronger participation in the 2011 revisions (Personal interviews, August 3, 2010 [Geneva]).

61. See, respectively, Margie Buchanan-Smith, "Interrelationships between Humanitarian Organizations," in *International Humanitarian Forum 2002: War and Accountability*, ed. S. Fleming, D. Meddings, and P. Perrin (Geneva: ICRC, 2002), 43; Peter Walker and Susan Purdin, "Birthing Sphere," *Disasters* 28, no. 2 (June 2004): 110.

62. Sphere Project, *Humanitarian Charter and Minimum Standards in Humanitarian Response* (Geneva: The Sphere Project, 2011), 4.

63. Sphere's independent evaluation indicated that, vis-à-vis donors, "there are no real rewards

for those NGOs who use it more, nor are there specific negative consequences for those who do not use it at all." Marci Van Dyke and Ronald Waldman, "The Sphere Project Evaluation Report" (New York: Columbia University, 2004), 8.

64. Quoted in Greg Barker and Darren Kemp, "Ghosts of Rwanda," in *Frontline* (PBS, 2004).

65. Terry, *Condemned to Repeat?*

66. IFRC, *The World Disasters Report* (Geneva, Switzerland: International Federation of Red Cross and Red Crescent Societies, 1997), 11–12.

67. RRN, "The Joint Evaluation of Emergency Assistance to Rwanda: Study III Principal Findings and Recommendations," in *Network Paper 16* (London: Relief and Rehabilitation Network (Overseas Development Institute), 1996), 10, 23.

68. Personal interview, July 3, 2010 (Geneva).

69. RRN, "Joint Evaluation," 3; John Borton, "The Joint Evaluation of Emergency Assistance to Rwanda," *Humanitarian Exchange Magazine*, no. 26 (March 2004).

70. Van Dyke and Waldman, "Sphere Project Evaluation," 21. See also Buchanan-Smith, "Interrelationships," 45.

71. Personal interview, April 13, 2012 (by phone).

72. Personal interviews, June 4, 2011 (Boston).

73. For example, Sean Lowrie, "Sphere at the End of Phase II," *Humanitarian Exchange*, no. 17 (October 2000): 13; Walker and Purdin, "Birthing Sphere," 104. Similar statements were made in interviews, including: July 3, 2010 (Geneva); August 3, 2010 (Geneva); February 2, 2011 (by phone).

74. Email communication, August 28, 2012.

75. Personal interview, Sphere staff, August 3, 2010 (Geneva). See also, Deloffre, "Global Accountability Communities," 12.

76. Dorothea Hilhorst, "Dead Letter or Living Document? Ten Years of the Code of Conduct for Disaster Relief," *Disasters* 29, no. 4 (November 2005): 351–69; Denis Kennedy, "Codified Compassion: Politics and Principles in Humanitarian Governance" (PhD diss., University of Minnesota, 2012).

77. Personal interview, Sphere staff, August 3, 2010 (Geneva).

78. Walker and Purdin, "Birthing Sphere," 103, 6–7.

79. Personal interviews, August 3, 2010 (Geneva).

80. Personal interview, March 27, 2012 (by phone).

81. Sphere Project, *Humanitarian Charter and Minimum Standards in Disaster Response* (Geneva: The Sphere Project, 2004), 12, 35.

82. IFRC, *The World Disasters Report* (Geneva, Switzerland: International Federation of Red Cross and Red Crescent Societies, 1999).

83. Personal interview, August 4, 2010 (Geneva). Similar sentiments were expressed in other interviews.

84. Sphere Project, "Sphere Training Resources, Modules 1–4" (Geneva: The Sphere Project, 2008), 10.

85. On deontic ethics, see Calhoun, "Imperative to Reduce Suffering."

86. Personal interview, June 3, 2011 (Boston).

87. Peter Salama, Nan Buzard, and Paul Spiegel, "Letters: Improving Standards in International Humanitarian Response: The Sphere Project and Beyond," *JAMA* 286, no. 5 (August 1, 2001): 531.

88. Lowrie, "Sphere at the End," 12.

89. Givoni, "Reluctant Cosmopolitanism: Perceptions Management and the Performance of Humanitarian Principles"; Ossewaarde, Nijhof, and Heyse, "Dynamics of NGO Legitimacy."

90. For example, Sphere Project, "Sphere Training Resources," 5.

91. Personal interviews, August 3, 2010 (Geneva).

92. Personal interview, February 2, 2011 (by phone); Personal interview, July 8, 2010 (Dublin). Multiple interviewees spoke of moving beyond good intentions.

93. Personal interview, July 3, 2010 (Geneva).

94. Van Dyke and Waldman, "Sphere Project Evaluation," 4, 7.

95. Shannon Kindornay, James Ron, and Charli Carpenter, "Rights-Based Approaches to Development: Implications for NGOs," *Human Rights Quarterly* 34, no. 2 (May 2012): 479–80; Brendan O'Dwyer and Jeffrey Unerman, "Enhancing the Role of Accountability in Promoting the Rights of Beneficiaries of Development NGOs," *Accounting and Business Research* 40, no. 5 (Winter 2010): 454.

96. Sphere Project, *Humanitarian Charter*, 83.

97. James Darcy, "Locating Responsibility: The Sphere Humanitarian Charter and Its Rationale," *Disasters* 28, no. 2 (June 2004): 120.

98. Sphere Project, "The Sphere Project: Conference Report" (London: The Sphere Project, 1998).

99. "The Sphere Project Phase II Interim Narrative Report: 1 November 1998–31 October 1999" (Geneva: The Sphere Project, 1999).

100. "Strategy2015: . . . . Right to Life with Dignity" (Geneva: The Sphere Project, 2009), 4.

101. "The Sphere Project 2010–2012 . . . . Towards the "Critical Mass" [Summary]" (Geneva: The Sphere Project, 2010), 8.

102. Austin and O'Neil, "Joint Standards Initiative."

103. For selected figures, see Sphere Project, *Sphere Project Newsletter No. 19*, April 2005; "Sphere Training Report 2008" (Geneva: The Sphere Project, 2009); "Sphere Training Report 2009" (Geneva: The Sphere Project, 2010), 6; "Sphere Learning Worldwide 2010 Report" (Geneva: The Sphere Project, 2011).

104. Personal interview, June 6, 2011 (Medford, Mass.).

105. Van Dyke and Waldman, "Sphere Project Evaluation," 29.

106. Personal interview, July 23, 2010 (Birmingham, UK).

107. Charlotte Dufour et al., "Rights, Standards and Quality in a Complex Humanitarian Space: Is Sphere the Right Tool?" *Disasters* 28, no. 2 (June 2004): 124.

108. Rafael Vila SanJuan, "MSF Position Vis à Vis the Sphere Project: Letter Sent to Missions, 25th March 2003" (Médecins Sans Frontières, 2003).

109. For example, Dufour et al., "Rights, Standards and Quality," 126; François Grünewald, Claire Pirotte, and Véronique de Geoffroy, "Debating Accountability," *Humanitarian Exchange Magazine*, no. 19 (September 1999).

110. Dufour et al., "Rights, Standards and Quality," 127. For evidence of Sphere in action in Haiti, see Margaret L. Satterthwaite, "Indicators in Crisis: Rights-Based Humanitarian Indicators in Post-Earthquake Haiti," *NYU Journal of International Law and Politics* 43, no. 4 (Summer 2011): 865–964.

111. Dufour et al., "Rights, Standards and Quality," 133. Though Sphere repeatedly emphasizes

context, as a proponent conceded, "Sphere has a tendency to be one-size-fits-all—there's your minimum standards; attain them or you fail" (Personal interview, July 20, 2010 (Dublin)).

112. Personal interview, June 6, 2011 (Boston). Similar views were expressed by a member of Groupe URD (June 4, 2011, Boston).

113. Jacqui Tong, "Questionable Accountability: MSF and Sphere in 2003," *Disasters* 28, no. 2 (June 2004): 177–80. On professional traditions and the contest between service and managerial professionalism, see especially Power, *Audit Society*, 114; Marion Fourcade, "The Construction of a Global Profession: The Transnationalization of Economics," *American Journal of Sociology* 112, no. 1 (July 2006); Hopgood, "Saying 'No' to Wal-Mart?"

114. Dufour et al., "Rights, Standards and Quality," 125.

115. Grünewald, Pirotte, and de Geoffroy, "Debating Accountability."

116. Personal interview, June 4, 2011 (Boston).

117. Sphere Project, "Sphere Training Report 2009," 13

118. Dóchas, "A Guide to Understanding and Implementing the Code of Conduct on Images and Messages" (Dublin: Dóchas, 2008), 2.

119. "A Guide to Understanding and Implementing the Code of Conduct on Images and Messages" (Dublin: Dóchas, 2007).

120. "A Guide to Understanding," 7.

121. Nikki van der Gaag and Cathy Nash, "Images of Africa: The UK Report" (London, UK: Oxfam/ European Economic Community, 1987), 1.

122. Personal interview, November 26, 2010 (by phone).

123. Personal interview, February 15, 2011 (by phone).

124. Personal interview, July 17, 2009 (Dublin).

125. The resulting document, a Finnish DEEEP member explained, reflected normative entrepreneurship from the Irish NGO platform, as few at the European level had seriously considered issues of representation. Personal interview, July 6, 2009 (Helsinki).

126. Personal interview, November 26, 2010 (by email).

127. Personal interview, July 8, 2009 (Maynooth, Ireland). See also Siobhán McGee, "Report on the Review of the Code of Conduct: Images and Messages Relating to the Third World" (Dublin: Dóchas, 2005).

128. Personal interview, July 16, 2009 (Dublin).

129. Personal interview, June 30, 2010 (by phone). This account was corroborated in two interviews with Irish Aid staff, July 14, 2010 (Dublin).

130. Personal interviews on the 1989 code: November 23, 2010 (by phone); November 26, 2010 (by phone); February 15, 2011 (by phone). Interviews on the 2004 code: July 17, 2009 (Dublin); June 30, 2010 (by phone).

131. On the Irish sector and nonprofit trends, see O'Dwyer and Unerman, "Enhancing the Role," 453. The Code's drafters looked within the field for regulatory models: of eleven codes studied, ten came from the aid and development sector.

132. Camille Donnat, "Dóchas Member Survey Consolidated Report" (Dublin: Dóchas, 2007).

133. Personal interview, July 17, 2009 (Dublin). Chouliaraki provides academic context for this quote. She identifies three shifts in the humanitarian media context, namely institutional instrumentalism, political individualism, and new media technologies. Chouliaraki, *Ironic Spectator*.

134. Personal interview, June 30, 2010 (by phone).

135. Personal interview, July 14, 2010 (Dublin).

136. Personal interview, July 14, 2010 (Dublin).

137. Maura Leen, "NGO Accountability: Issues, Lessons and Challenges for Dóchas and Its Members" (Dublin: Dóchas, 2006), 4, 6. The challenges became apparent in 2014, as fallout from a payoff scandal at the (non-humanitarian) Central Remedial Clinic led to an across the board decline in public donations to Irish charities, Nicola Anderson, "People 'Are Less Willing' to Give to Charities after CRC Scandal," *Sunday Independent (Ireland)*, March 10, 2014.

138. Siobhán McGee, "Whither the Irish Fundraising Sector?" (paper presented at the 13th VSSN / NCVO "Researching the Voluntary Sector" Conference, Warwick, UK, September 2007).

139. This sentiment was expressed in at least four interviews conducted in Ireland in July 2010. For a Dóchas perspective, see Eilish Dillon, "Review of the Code of Conduct on Images and Messages (2010–2012): Report for Dóchas Board" (Dublin: Dóchas, 2012), 5.

140. Kate Manzo, "Imaging Humanitarianism: NGO Identity and the Iconography of Childhood," *Antipode* 40, no. 4 (August 2008): 634.

141. Personal interviews, July 17, 2009 (Dublin); July 6, 2009 (Helsinki). For a Dóchas perspective, see Dóchas, "Dóchas Code of Conduct on Images and Messages: Report after Year 1," (Dublin: Dóchas, 2008).

142. "A Guide to Understanding," 4.

143. Personal interview, July 16, 2009 (Dublin). See also O'Dwyer and Unerman, "Enhancing the Role."

144. Dillon, "Review of the Code," 13.

145. Personal interview, June 26, 2014 (Dublin).

146. Dóchas, "The Illustrative Guide to the Dóchas Code of Conduct on Images and Messages," (Dublin: Dóchas, 2014).

147. Chouliaraki, *Ironic Spectator*.

148. McGee, "Report on the Review," 20.

149. Personal interview, February 15, 2011 (by phone).

150. Personal interview, July 8, 2010 (Maynooth, Ireland).

151. This includes a dozen different interviews in Ireland, Finland, and the UK from 2009 to 2014. See also Manzo, "Imaging Humanitarianism."

152. Lizzy Noone, quoted in Ruth Gidley, "Aid Workers Lament Rise of 'Development Pornography,'" *Reuters (AlertNet)*, September 14, 2005.

153. Personal interview, July 16, 2009 (Dublin).

154. Personal interview, July 16, 2009 (Dublin).

155. Personal interview, June 30, 2010 (by phone).

156. Kennedy, "Codified Compassion."

157. Personal interview, June 26, 2014 (Dublin).

158. ALNAP, "The State."

159. Personal interview, August 3, 2010 (Geneva).

160. Cathy Shutt, "A Moral Economy? Social Interpretations of Money in Aidland," *Third World Quarterly* 33, no. 8 (August 2012): 1527–43; Charli Carpenter, *"Lost" Causes: Agenda Vetting in Global Issue Networks and the Shaping of Human Security* (Ithaca, NY: Cornell University Press, 2014).

161. O'Dwyer and Unerman, "Enhancing the Role." Similar themes are discussed in Agier, "Humanity as an Identity."