



17th Annual
Engineering
Project
Organization
Conference

Working Paper Proceedings

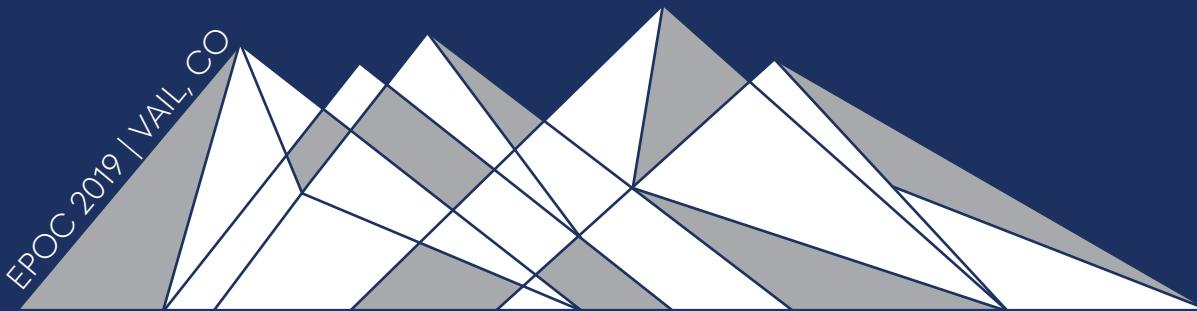
The Discourse of Regulation for Temporary Accommodations: A Comparative Case Study

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THE DISCOURSE OF REGULATION FOR TEMPORARY ACCOMMODATIONS: A COMPARATIVE CASE STUDY

ABSTRACT

The term *regulation* has been defined numerous ways in literature, yet it is unclear as to its function during times of extreme uncertainty, such as the provision of temporary accommodation in response to rapid population displacement. Critical discourse analysis is used to isolate and examine the ways in which *regulation* and its derivatives express power, cognitive understanding, and practice in relation to temporary accommodations for displaced persons in Germany, Sweden, and Lebanon. Since 2011 and peaking in 2015, these three countries represent the largest proportion of refugees and asylum-seekers per capita globally and in the European Union. This study includes 63 semi-structured interviews with individuals involved with providing or overseeing urban housing for displaced persons representing private companies, nonprofit organizations, and government agencies. Results show that while describing the temporary accommodation process, individuals express power through control of individuals (Power), normalize the response using the existing built environment (Cognitive Understanding), and the versatility of regulations during times of uncertainty (Practice). These findings contribute to the literature surrounding regulation by connecting definitions to usage in context. Practically, policy makers are able to better understand how regulations can function within a temporary response to stabilize the situation.

KEYWORDS

Displacement, refugee, regulation, critical discourse analysis, power

INTRODUCTION

Since 2015, global displacement has reached historical records. Increasingly, displaced populations are seeking refuge in urban areas in countries with both developed and developing economies (UNHCR 2016). Germany, Sweden, and Lebanon were some of the most publicized during the rapid influx of displacement that occurred during 2015. Germany received the most number of applications for asylum during 2015, Sweden had the highest proportion of applications for asylum per population in the European Union, and Lebanon currently has the global record for number of refugees per population (European Commission 2018; UNHCR 2016, 2018). All three countries are the focus of this comparative case study. In each context, displaced persons have sought shelter in urban areas, creating a tension between providing temporary housing solutions within the context of an established housing supply and governance mechanisms for the built environment. There are numerous implications of this situation, including increased stress on utility services, the creation of substandard living conditions in the housing market, and social instability.

Regulation is broadly defined as rule-making or “a broad form of organized governance” (Brunsson and Jacobsen 2002, 10; Busch 2011). Generally, regulations provide consistent delivery of service in projects, yet most existing research discusses economic, social, and technical applications (Baldwin et al. 2011). For example, studies have explored the effectiveness of using performance-based regulation (Duncan 2005) or the economic impact to the housing market from implementing new land-use regulation (Severen and Plantinga 2018). While previous work in the context of displacement has focused on regulatory interactions and exemptions, it has been observed that stakeholders use the term *regulation* in different capacities. The variance in this linguistical usage of regulation provides a glimpse into the ideology of how stakeholders view regulation within the social context of displacement and the technical context of providing temporary accommodation.

Such ideologies inform practice (Genus 2014; Thornton and Ocasio 2008) and given the power dynamic between stakeholders and vulnerable populations experiencing displacement (Hacker et al. 2018; Scott 2014), we seek to understand the relationship between how individuals engage with the term *regulation* and the resulting implications for the temporary housing process in the contexts of Germany, Sweden, and Lebanon through critical discourse analysis (CDA).

POINT OF DEPARTURE

This technical response to rapid population displacement through providing temporary accommodations exemplifies the Grand Challenge 5 (GC5) identified by the Engineering Project Organization Society – Lifecycle Value and Governance – in that the challenge of improving shelter conditions for refugees has required a coordinated effort between multiple stakeholders over an extended period of time, requiring deeper understanding of interactions between stakeholders, knowledge-sharing, and decision-making capabilities in this “service-provision mechanism” (Sakhrani et al. 2017). Drivers such as social wellbeing and complexity/uncertainty are at play in this context; the provision of service is being taken on by multiple stakeholders including partner organizations with varying ideologies surrounding the role of regulation. With such a diverse and complex project for sheltering vulnerable

populations, analysis of urban refugee housing in this context provides insight to dimensions surrounding stakeholders' perception of regulation and the practical implications of those perceptions.

REGULATIONS FOR TEMPORARY ACCOMMODATIONS

Literature has defined *regulation* broadly as a form of governance (Brunsson and Jacobsen 2002) or the “intentional use of authority that affects the behavior of a different party” (Lodge and Wegrich 2012, 19). These are just two in a vast realm of definitions attempting to standardize the rapidly expanding literature studying regulation and standards (Bowker and Star 1999; Timmermans and Epstein 2010). The main motivation of regulation is to create a baseline in quality or delivery of service (Busch 2011; Brunsson and Jacobsen 2002), however, the operationalization of this has yet to be fully explored with respect to temporary accommodations. For example in Sweden, a diverse group of actors came together to provide housing for displaced persons and in the process, compromised existing building regulations (Thompson 1967; Hacker 2019). Other work has mapped stakeholders’ regulatory-related interactions in Germany and found that regulations were used to constrain and facilitate the provision of temporary accommodation based on stakeholders’ position in the organizational network (Hacker et al. 2018). In both of these studies, *regulation* and *standards* were coupled together due to the varying definitions used by participants. In contrast, this paper explores the specific way in which individuals articulate *regulation* and its derivatives to identify nuances to help confirm or challenge the definitions presented in existing literature.

CRITICAL DISCOURSE ANALYSIS (CDA)

CDA explores the relationship between language use and social practice (Jørgensen and Phillips 2002) to understand the dynamics of “power, knowledge, and ideology” (Westwood and Clegg 2009, 223). Discourse is a representation of how reality is ordered and has the potential to be affected by the power relations within a particular network (Given 2008). Studies have described CDA as encompassing three major dimensions: (1) focusing on texts (2) located within a discourse (3) that is “inextricably linked to a social context which produces it and which it in part, constitutes” (Genus 2014). Given these definitions and main dimensions, the authors introduce an analytical framework for this specific CDA with three major components: power, cognitive understanding, and practice. *Power* is based on Foucault’s explanation that power is “a network or web that enables certain knowledge (s) to be produced and known” (Given 2008; Lawrence 2008). *Cognitive understanding* represents the social norms, values, belief which are used to construct a cognitive understanding of an individual’s perception of the world around them (Scott 2014). *Practice* represents actions taken based on an individual’s normative and cognitive understanding. These three components are intended to incorporate existing mechanisms used in CDA to help structure analysis in this study.

POWER

Power is defined in this study as the ability to influence the behavior of others (Clegg et al. 2006) operating through the construction of knowledge, norms and taken-for-granted accounts (Foucault 1980; Clegg et al. 2006). Such a construction of norms and accounts shapes the way organizations make decisions since they are

“under normative pressure to ensure that their goals are congruent with wider societal values” (Scott 2014, 184). In this study, we assume that stakeholders, when using *regulations*, can exercise power on: the built environment associated with the studied temporary accommodations (e.g., inside accommodations), individuals using this built environment (e.g., by shaping these individual’s mobility) and broader systems (e.g., the housing market). It should be noted that these three systems are intrinsically linked. For instance, De Certeau (1984) showed that built environments shape the identities of individuals using them (e.g., through physical barriers limiting their mobility), and on the opposite hand individuals shape the built environments they use (e.g., by altering them). The power that stakeholders have and exercise when using *regulations* can be particularly apparent in the context of the provision of temporary accommodations to displaced persons given the associated timeframe: stakeholders might need to make expedited decisions. In this case, decision-making processes are not standardized amongst stakeholders, who might thus use and perceive regulations in various ways. For example, regulations might be perceived as an agent inhibiting stakeholders from accomplishing their task of providing temporary housing, or as a tool to control the social behavior of displaced persons in the asylum application process.

METHODOLOGY

DATA COLLECTION

Data was collected in three separate timeframes between 2016 and 2018 in multiple cities in Germany, Sweden, and Lebanon with individuals involved with temporary accommodation for displaced persons from government agencies, partner organizations, and private companies (See: Table 1). Participants were selected based on their experience with the accommodation process; some potential participants were solicited through snowball sampling (Crouse and Lowe 2018). The roles of these individuals is listed in Table 2.

Table 1. Distribution of interviews that mention “regulation,” organized by country and participant category.

| Country (Time of Data Collection) | Government Agencies | Nonprofit Organizations (NGO) | Private Companies | Total |
|--------------------------------------|---------------------|-------------------------------|-------------------|-------|
| Germany (June – September 2016) | 5 | 6 | 17 | 28 |
| Sweden (October 2016 – June 2017) | 19 | 4 | 1 | 24 |
| Lebanon (August – October 2018) | 6 | 4 | 1 | 11 |
| Total | 30 | 14 | 19 | 63 |

Table 2. Professional backgrounds of individuals interviewed.

| Type | Germany | Sweden | Lebanon |
|------------|---|--|--|
| Government | Municipal government (social, building, health, leadership) | Municipal government (social, building, health, environmental, fire, | Municipal government (president, vice president) |

| | Regional government (permitting) | utilities) Regional government (building, migration) | National government (social affairs) |
|----------------------------|---|--|--|
| Nonprofit Organizations | Housing association International organizations (managing housing) | Local organizations (managing housing) | International organizations Lebanese organizations |
| Private | Construction companies Design firms Engineering firms Water/Sanitation utilities | Housing company | Construction firm |

Interviews were conducted in either English, German, Arabic, or French based on the individual's preference. Such meetings were audio recorded and lasted between 20-60 minutes. Questions began with the participant's experience, role in their respective organization, general observation of the displaced population in the city where they worked, housing for both the host community and displaced populations, minimum standards used, coordination with other stakeholders, and what they foresaw happening with regards to housing displaced populations in the coming years. Interview audio recordings were transcribed and translated to English as needed using professional services.

DATA ANALYSIS

Interview transcripts were analyzed using critical discourse analysis (CDA). Primary analysis isolated all excerpts using *regulation* or a derivation of the term (e.g. regulate, regulator, regulating, etc.). These excerpts were qualitatively analysed to understand which category (i.e. Power, Cognitive Understanding, or Practice) was represented in each specific use of the term. Secondary analysis created subcategories to better contextualize the use of *regulation* within the context of providing temporary housing. These subcategories were emergent from the analysis and were developed by the authors using an iterative process (Mills et al. 2010). These subcategories are defined with examples in Table 3.

Table 3. Critical discourse analysis subcategories defined with examples.

| Category | Subcategory | Definition | Example |
|--------------------------------|--------------------|---|---|
| POWER | Control | The power to influence or direct people's behavior or the course of events ¹ | "Now everything is more regulated , which is important of course. We couldn't have continued like that permanently. It's important for the city that everything is well coordinated, everything has its own function." (Interview, Germany, Private Company) |
| | Barrier | Creating an obstacle | "Sometimes I think that the regulation is too hard to this group." (Interview, Sweden, Government) |
| | Protection | Preserving or safeguarding | "We protect [displaced persons] just like we protect any citizen and just like we protect citizens from one another in a regulated way." (Interview, Lebanon, Government) |
| COGNITIVE UNDERSTANDING | Normalcy | Representative of the status quo | "There isn't any difference there at this point, and we didn't have any way to deal with, there weren't some special regulations ." (Interview, Sweden, Government) |
| | Rules | A set of explicit procedures used to maintain specific outcomes | "We have our own, it's not regulations , and it's more like rules. We developed a sort of how we are supposed to work with this. We don't have, it's not regulations but its rules that we sort of ... It's not really in terms of housing. It's more in terms of how we work with the kids within the facility." (Interview, Sweden, Government) |
| | Minimum Threshold | Baseline level for quality | "They're proper flats, but they want to build them over big car parks – with a lower standard. That just means, like, I don't know, not having to follow noise protection regulations or just having a bathtub in the bathroom without an extra shower. Things like that, they're not huts." (Interview, Germany, NGO) |
| PRACTICE | Tool | Mechanism for activity | "He's saying that he doesn't think it's possible to have camps and he's also saying that even if they're all not in one place they're being regulated and watched, and those who start causing problems will get repercussions." (Translation, Lebanon, Government) |
| | Flexibility | Lack of rigidity | "The temporary accommodations are meant to help people improvise a little bit from ... sections in the building regulations ." (Interview, Sweden, Government) |

¹Source: (Oxford Dictionary 2019)

LIMITATIONS

A comparative case study focused on discourse analysis inevitably introduces the potential for cultural differences between the use of discourse. This is noted and embraced in this study. While the authors do not claim to be able to distinguish all differences based upon variation in case study location, the goal of this study is to identify different interpretations of *regulation* with the purpose of using these findings to serve a basis for future work in finding causal relationships between these factors (e.g. country, organization, etc.). To minimize misinterpretation of transcripts, excerpts were analyzed not only within the context of the specific excerpt, but also within the interview as a whole and the study context (Jørgensen and Phillips 2002). In some cases, additional context was provided in the comparison between the direct translation of the interviewee's response and the translator's interpretation during the meeting. Finally, it is acknowledged that individual differences in the use of *regulation* might skew the frequency of results. The results from the analysis are presented with relative frequency according to aggregated categories such as the type of organization and country to more clearly distinguish this point.

RESULTS

A total of 63 interviews contained 285 excerpts with specific reference to regulation and its derivatives (e.g. regulate, regulating, etc.). Table 4 shows the distribution of these excerpts across the type of interview and location, along with the main subcategories that were referenced in the excerpt.

Table 4. Overview of percent relative frequencies for the major categories associated with regulations, with most prevalent subcategories.

| Category (Prevalent Subcategories) | Total (%) | GERMANY | | | SWEDEN | | | LEBANON | | |
|--|------------------|----------------|-----|---------|---------------|-----|---------|----------------|-----|---------|
| | | Government | NGO | Private | Government | NGO | Private | Government | NGO | Private |
| POWER (Control, Barrier, Protection) | 56% | 4% | 5% | 8% | 24% | 4% | 1% | 8% | 3% | 0% |
| COGNITIVE UNDERSTANDING (Normalcy, Rules, Minimum Threshold) | 26% | 4% | 2% | 7% | 11% | 0% | 0% | 1% | 1% | 0% |
| PRACTICE (Tool, Flexibility) | 18% | 4% | 0% | 2% | 10% | 1% | 0% | 1% | 0% | 0% |
| Total | 100% | 11% | 7% | 17% | 45% | 5% | 1% | 9% | 4% | 0% |

The majority of excerpts (56%) used *regulation* as a form of power. For example, *regulate* was synonymous with controlling some aspect of the situation, whether building type, individual behavior, or the response as a whole. This is aligned with the idea that *regulation* is a use of authority to manage peoples' behavior (Lodge and Wegrich 2012). The category with the second highest relative frequency was Cognitive Understanding (26%). Individuals referenced regulations in parallel with

normalizing the provision temporary accommodations in an attempt to standardize the cognitive component of this response to rapid displacement (Timmermans and Epstein 2010). Finally, *regulation* was also used in connection to action taken by individuals (Practice, 18%). These excerpts focused on how themselves were interpreted during the process of providing accommodation. Three main subcategories of *Power*, *Cognitive Understanding*, and *Practice* are discussed in greater detail in the following section.

DISCUSSION

POWER: CONTROLLING PEOPLE, BUILDINGS, & INFRASTRUCTURE

The majority of excerpts (56%) related regulations as a mechanism for power, and within this group, *control* was a predominant theme across all three countries (Germany 22, Sweden 31, Lebanon 21). The focus of this control varied across the three countries. All excerpts were juxtaposed with questions regarding the provision of temporary accommodation for displaced persons, with varying answers that touched on physical characteristics of the building, the process itself, and individuals associated with the process. For example, some participants described the control of a building aesthetics, or quality of living within the building itself:

*“Then we said, we have a **regulation** that's in the law, also part of this possibility, then we said you could make ugly buildings, it's okay. Basically, it says.” (Interview, Sweden, Government)*

The regulation was a way to control the outward appearance of the building, but in surrounding parts of this particular conversation, the aesthetic was not so important for buildings used as temporary accommodation. In this case, the aesthetic was not restricted by the regulation. In another interview, a local government official was asked about water quality in unconventional buildings, such as abandoned office buildings, which were quickly opened to house displaced persons:

*“Well, that's all **regulated** in Germany.” (Interview, Germany, Government)*

The participant went on to explain the process for ensuring safe water quality in buildings. In this case and others, *regulated* is concurrent with control, or an organized system for infrastructure and the built environment. In some interviews, the participant described the need to regulate, or control the housing market in association with the need to house displaced persons:

*“We are in a country that **deregulated** everything. Most of the public services have been partly, at least, privatized. That is especially the case for housing naturally. That's a terrible private market.” (Interview, Lebanon, NGO)*

In this example, the deregulation of the housing market was a loosening of control which made it difficult for people to find housing and led to informal or substandard housing for both Lebanese and refugee populations in urban areas. This connection between temporary housing and the overall housing market was also observed in infrastructure services:

“In May 1998 we witnessed all of these problems, and there was no Syrian migration yet. We saw these problems, so we began to try to regulate the infrastructure as much as we can with the available resources.” (Interview, Lebanon, Government)

The infrastructure for this particular municipality was seen as insufficient prior to the arrival of refugees, and local municipal leadership wanted to control access to infrastructure (through network expansion) with what they had available. The more recent increase of refugees in 2011 was described as additional stress on the already overloaded infrastructure networks for water, sanitation, solid waste, and electricity.

Finally, regulation is also described as a means to control people. In all three countries, regulation was used as a way to define the involvement of stakeholders in the temporary accommodation process, or the behavior and movement of displaced persons. In one example, a nonprofit related to their involvement as outside of the control of public law:

“Because the Stadtwerke is a public body and we’re not regulated by public law. We’re not connected to the city administration at all.” (Interview, Germany, NGO)

In another example from Lebanon, a municipal president described how the movement of refugees was controlled through temporary accommodation:

“We have special buildings and buildings owned by the municipality and schools. We put the refugees in those schools and the buildings that are owned by the municipality to be able to regulate them and to see what we could do, we thought it was going to last for two, three months.” (Interview, Lebanon, Government)

This type of language was consistent throughout all government interviews in Lebanon. The control of refugee’s movement and behavior with respect to the rest of the local community was referred to in association with regulating. Some Germany and Sweden interviews used regulation in this way as well (Germany 4, Sweden 1), but more so to control the location of the accommodation by the neighborhoods or the controlling agencies (Germany 6, Sweden 10).

COGNITIVE UNDERSTANDING: DEFINING THE NORM

The major category of Cognitive Understanding was coded for 26 percent of the excerpts analyzed in this study (See: Table 4). More specifically, *normalcy* is the subcategory of Cognitive Understanding that was the most frequently coded, representing 12 percent of all coded excerpts. The theme of normalcy emerged from Germany and Sweden interviews but was not identified in Lebanon interviews. In excerpts coded for normalcy, interviewees used the word *regulation* in association with words such as “normal”, “standard” or “usual”. Normalcy expressed by interviewees in these excerpts primarily relates to: (1) the quality of life in temporary

accommodations for displaced persons, and (2) the processes for constructing and renovating such accommodations.

On the one hand, regulations were described by interviewees as a way to guarantee the provision of adequate quality of life to displaced persons in emergency accommodations in Germany and Sweden:

“There's no low-standard housing, really, as I'm aware of. There might be, or there are some budget alternatives, but you can't really ... There are so many laws and regulations on building in Sweden, so you can't really tamper with it.” (Interview, Sweden, Government)

Such regulations that guarantee high living standards were described by interviewees as necessary, for instance:

“Then again, for some lazy sorts, if they don't have any regulations, then you produce some crap and you get away with that if you don't have minimum requirements for this and that. It gives you a chance but also opens the doors for disastrous stuff” (Interview, Germany, Private Company)

Following these regulations and ensuring a high quality of life for displaced persons was additionally perceived as beneficial for the hosting country by interviewees. For instance, when asked whether regulations were flexible, an interviewee replied:

“Do we provide a substandard for substandard people? No. We don't. It is in the long run, it is not clever to do that. You will pay twice if you do it. Because over the years, you need normal standards. And so, for this company, it is very clear, if refugee or not, we build the same product.” (Interview, Germany, Private Company)

A majority of Germany and Sweden excerpts coded for normalcy and discussing the quality of life in temporary accommodations focus on water and sanitation, and fire safety. It should be noted that interviewees perceived such norms as static: according to a majority of interviewees, these norms are not dependent accommodation time frame (temporary) and users (displaced persons) and did not expect these norms to evolve with time. For instance, four interviewees working in water utilities in Germany mentioned that standard German regulations about water and sanitation services were followed by stakeholders involved in the provision of temporary accommodations to displaced persons, ensuring high quality of services related to water and sanitation:

“We have our normal technical processes and of course our regulations, our standards that are very high in Germany concerning water and wastewater. (Interview, Germany, Utility)

“The law for potable water... the Water Resources Act, the Drinking Water Regulation, Hygiene for drinking water – these are all laws and we follow them every day.” (Interview, Germany, Utility)

Similarly, interviewees discussing fire safety regulations highlighted the static nature of associated norms:

“...when it comes to fire safety there are no exceptions” (Interview, Sweden, Government)

“It doesn't matter is it permanent or preliminary accommodations. It's the same, as to the security question, the fire question...” (Interview, Sweden, Government)

On the other hand, when using *regulations* to describe the norms associated with the processes for constructing and renovating temporary accommodations, interviewees primarily expressed a need for these norms to evolve. For instance, an interviewee perceived challenges in providing temporary accommodations to displaced persons as an opportunity to soften construction and renovation regulations to improve the city's ability to provide social housing:

“So we also need changes in the building regulations or in other areas. I think that our standards for building apartments are very, very high. We have a very high quality, but I think we need to cut down a bit in order to responsibly create affordable living space.” (Interview, Germany, Government)

Similarly, an interviewee stated that these challenges should have more influence on the evolution of construction and renovation regulations:

“That they really influence the way how to construct, or the rules how to construct, the funding of construction. From my perspective, the refugees are too less to influence...” (Interview, Germany, Private Company)

Individuals interviewed related their involvement in the temporary response for housing back to the existing status of the built environment. This standardization of infrastructure services in the host community normalized the quick response necessary for housing displaced persons and yet it also drew light to the areas in which the current system needed to be adaptive to such dynamic contexts.

PRACTICE: FLEXIBILITY IN INTERPRETATION

The third major category used in relation to *regulation* is Practice, with 18 percent relative frequency across all excerpts. This category includes the discursive use of *regulation* as an application to procedure and action taken by individuals. A secondary analysis found that across all three countries, *regulation* serves as a tool for stakeholders. Previous work has shown that in times of uncertainty, or with rapid response, conventional regulatory mechanisms are sometimes bypassed and stakeholders use normative and cognitive understanding to interpret appropriateness of regulatory procedure (Hacker 2019). In the case of temporary accommodations, this was also reflected through the use of *regulation* in interviews. *Regulation* is discussed as a tool that is open for interpretation when needed (e.g. emergencies or crisis contexts). For example, one government employee explained how the regulation was adapted to fit the context for temporary accommodation:

“Sometimes since they are old buildings, we can give a permit for certain circumstances which are not 100% according to the law, but in every case, our law, our building regulations say that the law can’t think about every situation. So in special cases we can allow the alternative. This is what we do with the refugee housings.” (Interview, Germany, Government)

In another example, the regulations themselves were discussed as being able to be altered:

“And there also actually some alteration it’s … you could see here where it says, sections in the building regulations. And then you say that you can use different kind of fire closets, you could fulfill the tents and so on.” (Interview, Sweden, Government)

These two examples provide a picture as regulations being flexible, and open to interpretation, rather than a rigid governance mechanism. This flexibility has the potential to present regulations as tools in the accommodation process. Either as a tool to accelerate the procurement process, control the process, or as a mechanism for power. An interview with a municipality president in Lebanon alludes to this concept; renting to refugees rather than doing collective housing or refugee camps allowed the government to control the behavior of individuals:

“He’s saying renting apartments is the most ideal situation, he doesn’t think it’s possible to have camps and even if they’re all not in one place, they’re being regulated and watched, and those who start causing problems will get repercussions. He’s also saying they have standards for the rent: the owner of the apartment won’t let two or three families rent out an apartment.” (In-person Translation, Lebanon, Government)

In this example, temporary accommodations are a tool for monitoring refugees and displaced persons and a means by which to control them, coupling with the Power category for this analysis. Literature has identified regulations as a tool for controlling behavior or aligning it with a certain baseline provided by regulatory agencies, however, this study has found that individuals within a regulatory mechanism can use regulations a tool for their own purposes as well that are outside of the original intent.

CONCLUSION

While migration patterns have always been present in history, in recent years, an unprecedented increase of forced migration has put additional pressure on governments and host countries’ built environments in order to receive vulnerable populations. Between 2016 and 2018, sixty-three semi-structured interviews were conducted with government officials, non-profit employees, and private companies regarding their involvement with providing temporary accommodation to displaced persons in Germany, Sweden, and Lebanon. Interviews were qualitatively analysed using critical discourse analysis to identify the ways in which *regulation* and its derivations are used in relation to temporary accommodations. Results carry both

practical and theoretical contributions for the path forward. Theoretically, this analysis adds to existing literature discussing the intersection of institutional theory and discourse analysis (Genus 2014; Westwood and Clegg 2009). Practically, little is known or documented regarding the provision of temporary housing in urban areas.

Of the 63 interviews, 285 excerpts contained a derivative of *regulation* (See: Table 4). Results show that *regulation* is used in reference as a form of power (Power), a way to normalize or characterize specific situations (Cognitive Understanding), and in practical application (Practice) (See: Table 3). *Regulate* was used as a way to control individual behavior, movement, and stakeholder involvement in the temporary accommodation process. The term was also key in normalizing individual's perception of the temporary response within the existing built environment. Finally, *regulations* were also used in discourse as flexible in interpretation, a mechanism for accomplishing individual goals, whether in the accommodation process, or for specific individuals.

Regulations are used as a method for standardization, yet this analysis provides another example for the diversity of understanding and application for this term. Results here show the relationship between social issues (vulnerable populations) and technical challenges (providing housing quickly) and provides three major aspects that should be included in related studies in the future. These aspects should be considered in future work considering the role of regulations in uncertain environments, such as rapid displacement, especially in contexts where power dynamics are more acutely present between stakeholders. While this study provides an initial analysis for the operationalization of regulation in discourse, the authors highlight the potential for additional studies to identify causal or significant relationships between various factors in the present study (e.g. country, employer) and others, such as integration or type of preferred housing.

ACKNOWLEDGEMENTS

This material is based upon work supported by the National Science Foundation under Grant No. 1624417 and 1624409 and the United States Agency for International Development Office of US Foreign Disaster Assistance (USAID/OFDA) and Habitat for Humanity International Graduate Student Fellowship for Humanitarian Shelter and Settlements. This project would not have been possible without translation provided by Alix Mougel, Olivia Maky, Max Bartosik, Katherine Bodner, and Ghina Abi-Ghannam. Many thanks to Tiolina Pistilli for assisting with the coding process for the Germany data. Finally, we are grateful to those that took the time to meet with us and share their experiences for this project.

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