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VOICE OUT LOUD

#35

LOCALISATION:

EXPLORING A MULTIFACETED AGENDA



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86 members
19 countries

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VOICE OUT LOUD #35

**LOCALISATION:
EXPLORING A MULTIFACETED AGENDA**

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part of the women-led partner Agri
Services Ethiopia water supply
project near Jinka, capital of South
Omo (Ethiopia). ©Photo: Michael
Mosselmans/Christian Aid

VOICE wishes to thank the
contributors of this issue.
Views expressed herein do
not necessarily reflect those
of the VOICE network.

Editorial



Over the last years, calls for humanitarian agencies and donors to be ‘as local as possible, and as international as necessary’ have dominated debates and discussions. While progress has been made in advancing localisation approaches, more can be done to ensure equitable partnerships and participation.

VOICE members have longstanding experience of working in partnerships with local and national organisations. Therefore, this edition of the VOICE out loud (VOL) offers an insight into the perspectives of some of our members in relation to their localisation approaches. Given the breadth of our membership, it is inevitable that we define and approach localisation in many different ways. It is this diversity – and the opportunities for learning that comes with it - that is of such added value in bringing localisation forward.

In this edition of VOICE out loud, Christian Aid highlights the progress that has been made on the localisation journey and outlines what more needs to be done to accelerate progress on the topic. EU Cord describes the key role of donors in enabling local actors in humanitarian response through funding, recognition, and organisational development.

The importance of capacity sharing and mutual learning between local and international actors is highlighted by Trôcaire, while People in Need looks at the principle of neutrality and local actors in the Ukrainian conflict.

At the moment, INGOs feel that they carry the burden of legal and compliance risks in establishing partnerships with local and national organisations. As such, the article from Oxfam is timely as it delves into the need for broader risk sharing as a precondition of more widely advancing localisation. By recognising the importance of building equitable partnerships to foster communities’ participation in decision-making processes and giving them a greater voice and agency in their own recovery, VOICE members are all committed to working towards a fairer share of power. Donors and decision-makers need to play a mutual role in supporting NGOs seeking to create an enabling environment for the development of equitable and just partnerships.

To create an environment that supports equitable partnerships, we need to collectively discuss risk sharing. While DG ECHO’s equitable partnerships guidance note is a good starting point, further discussions need to take place including agreeing on ways to ensure heightened flexibility in due diligence requirements and finding ways to ensure a more adequate level of overhead costs for national and international actors. Further dividing an already insufficient pie may prove not to be the best way to encourage progress.

VOICE members are ready to continue their journeys along the localisation road. Through this edition of VOL, we call on donors to support us in our efforts to create long-lasting and equitable partnerships.

Dominic Crowley

VOICE President

LOCALISATION: WHERE ARE WE AT AND HOW DID WE GET HERE?

THE ISSUE

LOCALISATION: EXPLORING A MULTIFACETED AGENDA

EARLY LOCALISATION DEVELOPMENTS

Many faith-based INGOs and the Red Cross movement have worked with local partners for decades. In 2013, humanitarian researchers Ben Ramalingam, Bill Gray and Georgia Cerruti issued the “Missed Opportunities” report evidencing the case for greater investment in local actors. In 2015, NGOs ADESO, CAFOD, Christian Aid and DanChurchAid launched the ‘Charter for Change’, where 40 INGOs made 8 commitments toward empowering partnership practice, which were endorsed by 600 local NGOs.

In 2016, OCHA organised the World Humanitarian Summit in Istanbul. In advance of the Summit, OCHA held regional consultations with thousands of humanitarian stakeholders. The loudest issue that emerged was the need for a shift in power in the sector to channel more respect, more voice and more resources to local actors, such as local civil society and local Red Cross/Crescent branches.

THE CASE FOR LOCALISATION

The case for localisation relates partly to effectiveness and partly to ethics. On ethical grounds, some feel it right for national actors in their own country to lead the management of the assistance communities require in a crisis. If there were a flood in Italy, many affected citizens would likely feel more comfortable being supported by Italian emergency services than by an influx of American, British or Russian rescue workers.

“The effectiveness case is that many local actors are closer to the communities they come from, so better positioned to understand what kind of assistance communities value, what kind of assistance best fits with the local culture, and who the most vulnerable people are”



Christian Aid partner Jeridoo Foundation (JDF) working in IDP camps in NE Nigeria near Maiduguri in Borno State organizing football tournaments to aid the psycho-social well-being of displaced children fleeing Boko Haram terrorist violence, funded by the Dutch Relief Alliance. ©Photo: Michael Mosselmans/Christian Aid

The effectiveness case is that many local actors are closer to the communities they come from, so better positioned to understand what kind of assistance communities value, what kind of assistance best fits with the local culture, and who the most vulnerable people are. They are more able to communicate candidly with communities and hence to better respond to feedback. They are in communities before during and after crises so well-positioned to ensure a smooth transition between preparedness, relief, and recovery. Their running costs are lower than international organisations which enables value for money. Furthermore, the growing volume of crises occasioned by escalating climate change, COVID-19 and renewed conflict in several contexts significantly exceed the international system’s capacity, so it is imperative to grow national response capacities to strengthen the sector’s reach.

With thousands of local civil society organisations in dozens of different settings, it would be ludicrous to pretend that one size fits all, so the capacities, strengths and weaknesses of local actors vary enormously (as with international NGOs).

PROGRESS ON LOCALISATION

At the World Humanitarian Summit, major donors, UN agencies, the Red Cross and three major NGO networks (ICVA, InterAction and SCHR) signed the Grand Bargain, with commitments to accelerate localisation, including the target of providing 25% of funding to local actors from a baseline of 0.2%. The target is often misunderstood as it refers to funding that reaches local actors via one intermediary – wherein a donor like ECHO gives funding to an intermediary like WFP who give money to a local actor. We do not yet have effective data systems to measure this well.

The COVID-19 crisis that resulted in an unprecedented global lockdown from early 2020 created significant challenges to international actors with restrictions on movement and travel meaning local actors had to take a larger role in delivering humanitarian assistance. Furthermore, the #BlackLivesMatter movement that gained prominence following the unlawful killing of George Floyd in May 2020 resulted in significant reflection across the international NGO sector about how to respond to accusations of racism and colonialisation concerning long-standing sector practices, which accelerated efforts to think about how to better respect local humanitarian actors as a sector.

One outcome was the establishment of the “Pledge for Change” launched in October 2022 by the CEOs of ADESO, CARE, Christian Aid, OXFAM and Save the Children, and signed up to by 11 INGOs making commitments to an ambitious decolonisation agenda around equitable partnership, authentic storytelling and influencing wider change.

Meanwhile, Grand Bargain 2.0 launched in May 2022 narrowed from its original 10 themes to prioritise progress in quality funding, localisation and participation. The Grand Bargain established two high-level caucuses on localisation to secure leadership commitment to unlock barriers – one committed to more empowering practices toward local partners by intermediaries (INGOs, Red Cross and UN); a second considered how to better deliver progress toward the 25% target.



Community members part of the women-led partner Agri Services Ethiopia water supply project near Jinka, capital of South Omo (Ethiopia). ©Photo: Michael Mosselmans/Christian Aid

DONOR INITIATIVES

Important donors have begun to issue progressive new policies to drive localisation forward, including USAID, the world’s largest donor, who are making determined strides toward increased quality funding for local actors. Michael Koehler, Deputy Director General of DG ECHO, launched ECHO’s progressive new localisation policy at the European Humanitarian Forum on 20 March 2023, which requests partners to prioritise working with local actors where achievable, proposes that if possible at least 25% of each ECHO grant should be channelled to local actors, demands that local partners receive fair overhead costs, and undertakes to give those who demonstrate equitable partnership practice extra marks when choosing which proposals to fund.

FUTURE DIRECTIONS

An important development being furthered by some international and local NGOs is to move one step further by not only seeking to shift power to local organisations, but to shift power to communities in crisis. One important modality is the ‘Survivor and Community-led Response’ approach developed by the Local to Global Protection initiative, where local NGOs make small grants to community-based, grassroots and pop-up groups who design and implement their own humanitarian assistance, protection and recovery interventions, straddling the cash, localisation, nexus and participation themes of the Grand Bargain.

BUMPS IN THE ROAD

A significant challenge for the localisation agenda has been that rhetoric on localisation is far ahead of reality in crisis countries. All major international humanitarian stakeholders have signed the Grand Bargain and in the aftermath of COVID-19 and #BlackLivesMatter, it is hard to find a humanitarian actor who claims not to believe that localisation is the way forward for the sector. But many actors have been slow to walk the talk.

A further challenge is that the heavy compliance architecture of the international humanitarian system can imply that the national NGOs that donors are most comfortable to fund are big capital-based national NGOs that display the same characteristics as international actors, whereas some believe that smaller community-based grassroots organisations, who struggle to navigate the complex compliance demands of the international system, bring the most attractive advantages of locally-led response, being closest to the communities they serve.

“Moving the centre of gravity of the debate from Geneva, Brussels, and New York to country level. It is at the country level where humanitarian action happens and where progress toward localisation is slower than everyone would wish. ”

NEXT STEPS TO ACCELERATE PROGRESS

The key ways forward being proposed by the Grand Bargain and the Charter for Change include:

- moving the centre of gravity of the debate from Geneva, Brussels, and New York to country level. It is at the country level where humanitarian action happens and where progress toward localisation is slower than everyone would wish. The Grand Bargain is establishing National Reference Groups to bring multi-stakeholder dialogue to crisis contexts; the Charter for Change is establishing country networks with the same intention; and the Start Network is decentralising power to locally-led hubs
- ensuring fair overhead costs for local actors. International actors insist on receiving 7-10% overheads to meet the costs of their organisation in programme budgets. National actors seldom receive anything. But national actors also require investment in their operating costs (e.g. security guards, cleaners, staff training, financial systems, office maintenance, conference attendance, psychological support, well-being, health insurance, pensions, transport.)
- the need to revisit compliance and due diligence requirements to ensure they are fit for purpose, proportionate and do not inhibit progress toward localisation
- Trocaire, CAFOD, Christian Aid, CRS, Kerk-in-Actie, SCIAF and Tearfund have launched a pilot under Charter for Change to investigate how to simplify and harmonise compliance and due diligence as a first stab at modelling good practice for the sector.

Michael Mosselmans, Head of Humanitarian Division
Christian Aid

BUILDING AN ENABLING ENVIRONMENT FOR LOCAL ACTORS IN HUMANITARIAN RESPONSE: THE CRUCIAL ROLE OF DONORS

THE ISSUE

LOCALISATION: EXPLORING A MULTIFACETED AGENDA



Faizi Welongo II, CEPAC (Communauté des Eglises de Pentecote en Afrique Centrale) Country Coordinator for Humanitarian Assistance, at a Child Friendly Space in Tanganyika, DRC. ©Photo: Hannu Happonen/Fida

“If local actors are to provide timely and effective humanitarian response, then the role of donors in creating the enabling environment is crucial.”

If local actors are to provide timely and effective humanitarian response, then the role of donors in creating the enabling environment is crucial.

In the 2016 Grand Bargain, signatories pledged to provide at least 25% of their humanitarian funding to local and national responders by 2020; in 2023 this goal is still unmet.

But donors' role in building an enabling environment for local actors is not limited to the funding offer. Localisation requires an ideological change which includes shifting decision-making, resources, and control to local and national actors.

This approach is crucial in redesigning a humanitarian system fit to meet new humanitarian challenges.

Without an ideological rethink, the barriers faced by local actors will continue to hinder the transformation of the humanitarian system. One major barrier is access to direct funding. The overreliance on international intermediaries will also persist, which risks diminishing the 'as local as possible, as global as needed' rhetoric.

“Without an ideological rethink, the barriers faced by local actors will continue to hinder the transformation of the humanitarian system.”

A MORE INCLUSIVE HUMANITARIAN SYSTEM

Ideological rethinks are tough, but we can find examples elsewhere. The disability movement uses the concept of accessible design to describe the creation of products, environments, and services that can be used by a wide diversity of people, including and beyond those with disabilities: good design is better for everyone.

The concepts underpinning accessible design can provide a lens through which to examine and address systemic barriers that hinder local actors' participation in humanitarian action, for example, simplifying heavy administrative burdens: an environment which is enabling for local actors is in fact better more effective environment for all actors, including INGOs and donors. The momentum for localisation is growing, so what roles can donors play to strengthen the humanitarian community in general, and local actors in particular?

> A legitimising role

Donors have a role in recognising NGO certification schemes for humanitarian actors. These voluntary initiatives, which can be national or international, help NGOs establish and maintain standards for their humanitarian work and provide a mechanism for demonstrating their commitment to ethical and accountable practices.

By recognising these schemes, donors can help to build trust between NGOs, communities, and other stakeholders, leading to stronger partnerships and more effective outcomes.

> A financing role

Funding, and the directness of funding, is one indication of donor confidence in their implementing partner. Direct funding to local actors is not just about the money. It is a marker that legitimises the humanitarian organisation's work towards other stakeholders.

Local actors must be able to access financing without excessive administrative or reporting requirements. Actors should be able to demonstrate a right of initiative regarding how money is spent to fulfil humanitarian objectives. Donors need to give a reasonable allocation of unrestricted funds to support both project implementation and development of the local actor. As do intermediaries.

“Donors must play a crucial role in enabling local actors in humanitarian response through funding, recognition, and organisational development. Such shifts will benefit the entire humanitarian system and ultimately and most importantly, those in need of assistance.”

> Donor role in recognition and visibility

Donors can help raise the profile of local humanitarian actors by recognising their work and highlighting their actions through traditional and social media channels. This would re-educate the public to realise the diversity of humanitarian actors and show how partnership approaches between different actors contribute to more impactful delivery of humanitarian aid.

> Driving organisational development

Donors push NGOs to develop and meet the grant and programme standards. Donors play a critical role in helping local actors to meet these requirements, providing support and guidance where needed.

> Facilitating networking and partnerships

Coordination and partnership building is essential for effective humanitarian response. Donors can facilitate networking and partnerships between local humanitarian actors and other organisations in the sector, including international NGOs, UN agencies, coordination mechanisms, and other donors.

In closing: donors must play a crucial role in enabling local actors in humanitarian response through funding, recognition, and organisational development. Such shifts will benefit the entire humanitarian system and ultimately and most importantly, those in need of assistance.

Ruth Faber, CEO
EU-CORD network

HOW TO SHARE RISKS AND GIVE MORE POWER TO LOCAL ACTORS? A LOOK AT ADAPTING RISK SHARING FOR LOCALISATION

THE ISSUE

LOCALISATION: EXPLORING A MULTIFACETED AGENDA



Oxfam and partner Organization for Rehabilitation and Development in Amhara (ORDA) orienting beneficiaries on support items, how to use the materials, C-19 related awareness and related information. ©Photo: Serawit Atnafu/Oxfam

To allow the humanitarian system to change, donors and intermediaries need to become more flexible and thoughtful in their risk management approaches, whilst local actors need flexible funding to invest in security and financial systems.

Localisation policies have been continuously growing in recent years, with the Inter-Agency Standing Committee publishing numerous guidance documents ranging from how to increase participation in the cluster system to the provision of overhead costs to local actors. Much focus has been on shifting the quantity of funding to local actors – 25% of humanitarian funding as directly as possible – as committed in the Grand Bargain 7 years ago. Donors, including ECHO have been developing localisation guidance too, looking at supporting more equitable partnerships. Whilst the delivery of these policies, commitments and guidance remains patchy in many crisis contexts, the momentum for change has grown.

“Sharing risks within the humanitarian system is an important part of the localisation debate.”

Sharing risks within the humanitarian system is an important part of the localisation debate. Which risks are we speaking about here? This often changes depending on who you engage on this topic. Donors tend to focus on fiduciary and reputational risks, local actors may speak about delay in fund disbursement and intermediaries¹ may discuss security risk and the burden of due diligence processes. These risks are of course connected.

1. “The term ‘intermediaries’ is commonly understood as referring to international organisations. However the reality is more nuanced. Intermediaries are organisations, networks or mechanisms which act as an intermediary between funding partners/donors and national or local organisations through the provision of funding or other support. This function is carried out by INGOS, UN agencies, private companies/contractors, and some national organisations. This role is neither static nor fixed. Organisations, networks or mechanisms may sometimes act as intermediary, as well as directly implement. Thus the term ‘Intermediary’ refers more to a function than a predetermined role delivered by predetermined actors.” [GB Caucous outcome paper on the role of intermediaries](#)

COMPLIANCE THRESHOLDS SHOULD VARY DEPENDING ON GRANT AND ORGANISATION SIZE

Donors need to reflect on their contractual requirements, to make them simpler and ensure flexible criteria that can then be cascaded by intermediaries to local actors. Working with different kinds of local actors takes different approaches. For small community group grants the compliance requirements should be significantly lower than a contract of a high amount with a large well established local NGO. The best practice for funding small organisations more easily should be in consortia projects, where risks can be collectively assessed and shared between intermediaries and local actors. Donors also have a role in funding adequate mitigation measures and local actor organisational capacities.

DUE DILIGENCE PASSPORTING – AN EFFICIENCY IMPROVEMENT

In managing multiple donor compliance requirements and risks, intermediaries undertake due diligence or partnership assessment processes with local actors. These are time consuming, making the overall humanitarian system less efficient and effective. For example, most capacity assessment forms or due diligence assessment forms of international actors and donors are very similar. Which means a local actor may be asked the same questions by similar actors several times. Donors and intermediaries should work together to cross rely on each other's processes, thus 'passporting' the due diligence of a local actors.

"Between 2019 and 2020, my organization has been involved in seven assessments, and the figure would be higher had the year not been interrupted by COVID-19 restrictions. With no coordination among INGOs, these assessments covered over 90% of the same content. We are engaged in endless interviews that could be streamlined and make the humanitarian sector more efficient. This would not only save money but also a lot of precious time for everyone involved."

Ahmednasir Mohamed,
Save Somali Women and Children

In addition, these processes often lead to a delay in the disbursement of life-saving funds, which in turn puts pressure on the implementing local actor to deliver activities in a rushed manner, which can compromise quality and ultimately creates reputational risks and trust issues for the local actors with the communities they serve and the local authorities they coordinate with.

“Donors need to reflect on their contractual requirements, to make them simpler and ensure flexible criteria that can then be cascaded by intermediaries to local actors.”

BOTH LOCAL ACTORS AND INTERMEDIARIES NEED TIME TO ADJUST

For some donors and intermediaries, the shift away from top-down managing – with responsibility for risk and accountability – towards a more brokering roles is scary. For LNHA's, the shift from implementing donor or intermediary led projects towards co-defining and planning projects and managing funds provides space to learn and grow but also demands more responsibility, accountability and commitment.



Tamara Dmytrivna, 74. Tamara lives in a shelter for displaced persons in Mykolaiv oblast. The Tenth of April (TTA) helped to evacuate her and secure her a place in the shelter where she is staying with her daughter. ©Photo: Kieran Doherty/Oxfam

JOINT ANALYSIS & NEXUS APPROACH

Right from the onset of a programme design, all stakeholders should be jointly identifying and assessing risks and what is needed to mitigate these, which may include capacity strengthening activities. Donors should incentivise such joint risk assessments as part of standard proposal development practices and by providing adequate funding for mitigations actions. The nexus approach opens up further possibilities: the possibility of blending different kinds of donor funding to support institutional growth and of mitigating different types of risks at the same time, making the overall system more effective and resilient.

Often, donors and intermediaries do not prioritise enough the risks perceived and managed by local actors. This reinforces existing power dynamics and leaves local actors exposed to risks without support – financial or technical – to manage these well. There are lessons to learn from the piloting of new tools to promote risk-sharing, such as the Global Interagency Security Forum’s (GISF) Joint Action Guide on Security Risk Management in Partnerships. These lessons can be gathered and systematically used at all stages of EU and other donor-funded partnerships.

To support local actors in terms of safety and security risk sharing, donors and their partners, should provide local actors where necessary with security assessments and support their management capacity. Local actors often have a better understanding of the context and therefore how to keep their staff safe. It is because of their understanding and knowledge of the risks that we need to listen and include local actors in risk assessments and the design of mitigation measures. They may need funding for security equipment and other tools, such as satellite phones or HEAT training, that can facilitate their day-to-day security management. It is important that donors including DG ECHO and intermediaries provide full costs to cover security expenses of local actors including for psychosocial support or opening the International actors’ access to those services to their local partners as well.

OVERHEAD COSTS FOR LOCAL ACTORS CAN CONTRIBUTE TO BETTER RISK MANAGEMENT

Risk sharing as noted should start with a commitment from donors and intermediaries to covering the full direct and indirect costs of all partners’ activities. This can only happen if donors incentivise change among grant recipients by improving their overhead costs coverage conditions to be better reflective of the actual costs incurred by all actors involved in the funding chain and requesting policies on the provision of overheads to local actors from UN agencies and international NGOs.

This would send a clear signal to intermediaries that fully covering the overheads of local actors is a priority area for donors and help to initiate more productive conversations around the reality of ICR and ICR sharing. An example of this is the Netherlands Ministry of Foreign Affairs who have requested the Dutch Relief Alliance to develop an ICR-sharing policy in 2022 for future funding agreements.

Similarly to what ECHO have introduced in their new equitable partnership guidance, to monitor the progress, donors may go ahead to request reporting on how overheads will be/have been provided/cascaded through funding chains and written justification in cases where overheads are not provided to downstream partners.



In the aftermath of the Hunga-Tonga-Hunga-Ha’apai eruption, two Tonga National Youth Congress members load packages into a truck to distribute supplies to their community. ©Photo: Samuela Halahala/Oxfam

RECOMMENDATIONS

Donors need to address the challenge of bureaucracy by entering into more strategic partnership arrangements with their long term intermediaries, that reduce the overall administrative burden, support equitable partnerships with L/NAs and provide a basis for more predictable flexible and longer-term funding.

Donors should adapt their compliance requirements to different types of partnerships and enable intermediaries to adopt more harmonised and standardised due diligence approaches that help to reduce the fatigue and time wastage in such processes.

Intermediaries should jointly undertake risk assessment with L/NAs and donors avail contingency funds to local actors based on the assessment reports to mitigate the anticipated risks. Policies and guidelines to address risks should be developed not only to mitigate risks faced by donor and intermediaries but also for local actors for example the policy on duty of care among others.

Based on the IASC overhead cost guidelines, donors need to fund full project costs and to provide adequate overheads for all actors involved in the projects they support. Donors can also encourage and advocate for intermediaries to develop ICR sharing policies as part of their funding criteria.

Eyokia Donna Juliet, Project Manager -
Disaster Preparedness and Response
Community Empowerment for Rural Development (CEFORD)

Amy Croome, Humanitarian Policy Advisor
on Local Humanitarian Leadership and Aid Reform, Oxfam

NEUTRALITY IN THE HUMANITARIAN RESPONSE IN UKRAINE

THE ISSUE

LOCALISATION: EXPLORING A MULTIFACETED AGENDA



©Photo: Guillaume Binet/People in Need

Although at the very beginning of the war's escalation, there was an anticipation that neutrality would be downplayed in the humanitarian response in Ukraine, this concept is still relevant, but there are nuances to its realisation.

The humanitarian crisis caused by Russia's full-scale invasion of Ukraine demonstrated the insufficient ability of the existing funding system to cope with the needs of the affected population¹. Although the local actors – volunteers, community initiatives and civil society organisations (CSOs) – are the driving force behind this response, they face obstacles in accessing money accumulated globally for the humanitarian crisis in Ukraine. In this context, the word *localisation* started dominating humanitarian debates in Ukraine, and solutions were sought to make humanitarian funds more easily accessible to local actors. This included the simplification of due diligence for partner organisations, harmonisation of assessments, greater involvement of local actors in programme design, etc. Principled humanitarian aid and, in particular, adherence to the principle of neutrality, came under the spotlight as a concept that, in the opinion of some local responders, needs to be adapted to the Ukrainian context.

Neutrality means that providers of humanitarian assistance do not support parties to the conflict. In Ukraine, the level of public support for the army is high because nobody else can physically protect Ukrainians. When it comes to military needs, the army is supported by Ukraine's partners (military equipment and training), but also by Ukrainian foundations and volunteers. Such fundraisers openly state the goal of their campaigns and do not usually apply for international humanitarian funds. During the first months of the war's escalation, some of them sent to INGOs requests for diverse forms of military's support, but stopped doing so after humanitarian agencies clarified their position on neutrality.

The humanitarian needs of the soldiers are normally covered by the state as well as by Ukrainian foundations that purchase, among other things, goods that can be used for both civilian and military purposes. In some cases, Ukrainian CSOs may provide humanitarian assistance to the army as well as to civilians, but use different budget lines for these activities and distinguish between the two funding streams in their operations. In Ukrainian legislation, humanitarian assistance is a broad concept that includes goods for both civilians and the military².

1. [Enabling the local response: Emerging humanitarian priorities in Ukraine March–May 2022](#). The Humanitarian Outcomes, June 2022.

2. [The Law of Ukraine on humanitarian assistance](#). The Verkhovna Rada of Ukraine.

“In response to awareness raising efforts undertaken by international humanitarian agencies that were pointing out to this practice as violating humanitarian principles and advocating for bringing Ukrainian legislation in line with the International Humanitarian Law, Ukrainian authorities have been demonstrating their openness to shifting their approach to neutrality.”

In particular, it resulted into the situation that during the first months after the start of the full-scale invasion, Ukrainian authorities sometimes used the same warehouses for aid storage for both groups³. In response to awareness raising efforts undertaken by international humanitarian agencies that were pointing out to this practice as violating humanitarian principles and advocating for bringing Ukrainian legislation in line with the International Humanitarian Law, Ukrainian authorities have been demonstrating their openness to shifting their approach to neutrality. The work on the draft of the new law on humanitarian assistance is still ongoing although there has been no final decision yet if it will include aid to the military.

Meanwhile, a vast category of CSOs in Ukraine focuses purely on providing assistance to the civilian population. On the side of Ukraine’s civil society, there is normally a will to get acquainted with humanitarian standards since this knowledge helps to guarantee a higher quality of response and sustainability of INGOs’ support. Those local organisations that follow the neutrality principle do not usually try to access humanitarian funds to cover the needs of the military. There is also a pool of Ukrainian CSOs that, due to INGOs’ position on neutrality, choose not to cooperate with international humanitarian agencies and to seek alternative sources of funding. Although there are just a few, their voices advocating for a different interpretation of neutrality in the Ukrainian context are strong and reflected within the international community. Although PIN does not partner with organisations from this pool, it keeps track of their statements and shapes its localisation policy with due consideration of the complexity and sensitivity of the perception of the principle of neutrality in the country.

In a situation in which the humanitarian response is overwhelmingly implemented by local organisations, and considering the high solidarity of Ukrainians with the Armed Forces, the international community faces a difficult task in terms of neutrality. On the one hand, no one has cancelled humanitarian principles, and INGOs need to make sure that the humanitarian money they were trusted with by their citizens and governments is spent only on civilians. To ensure that Ukrainian volunteers and CSOs stick to neutrality, international agencies encourage their partners to complete learning modules on the ethics of humanitarian work and to promote compliance with neutrality⁴. During the implementation of humanitarian programmes by local actors, apart from normal monitoring, INGOs additionally scrutinise the distribution of dual-use items to ensure that it is civilians who are making use of them. Neutrality is also the way to secure humanitarian access to non-government-controlled areas (NGCA). Noteworthy, however, in the Ukrainian context, only a few INGOs, acting usually through local actors, can currently operate in territories controlled by Russia.

On the other hand, INGOs recognise the dilemma of pushing Ukrainian civil society – politicised, but also traumatised, with their relatives, friends and compatriots being killed, injured, and raped because of the war - to stay neutral in their humanitarian activities. As mentioned in an open letter signed by Ukrainian CSOs, “We do not want to remain “neutral”. The value of human life must come first, and supporting the needs of those on the front line can significantly reduce the amount of civilian aid needed and the number of casualties”⁵. Volunteers also say that Ukrainian soldiers are often the first ones to enter liberated locations, sharing their medicines, food, and water with the local civilians long before humanitarians start their operations there⁶.

“In a situation in which the humanitarian response is overwhelmingly implemented by local organisations, and considering the high solidarity of Ukrainians with the Armed Forces, the international community faces a difficult task in terms of neutrality.”

3. [Humanitarian headquarters of Ternopil continue to provide volunteer assistance to internally displaced persons and military servicemen](#). Ternopil city council, 2022.

4. SDC Fair partnership principles. Swiss Agency for Development and Cooperation SDC, 2022.

5. [If not now, when?](#) National Network of Local Philanthropy Development, August 2022.

6. National workshop on Localizing humanitarian aid in Ukraine; Kyiv, 17.02.2023



©Photo: Albert Lores/People in Need

Meanwhile, Ukrainian CSOs are often sceptical about the merits of trying to get humanitarian access to areas occupied by Russia: “Neutrality made sense to me in 2015 because it helped my organisation to assist the civilians in NGCA in Donetsk. Back then, de facto authorities could tolerate some Ukrainian and international NGOs working on this territory; now, when the war became full-scale and Russia acts openly, access to locations controlled by Russia is not realistic⁷”. One more argument questioning the advantages of neutrality is that Russia seems to perceive any Western support to Ukraine – be it military or civilian, direct or through local actors – as non-neutral. Russian missiles regularly hit humanitarian warehouses in Ukraine and people standing in line for humanitarian aid. That is why for local responders, there is a lack of evidence on how their adherence to neutrality can increase their chances to access the areas occupied by Russia.

Despite some discussions within the humanitarian community that INGOs might abandon the principle of neutrality for the sake of demonstrating solidarity with Ukraine⁸, this has not happened. As often, the principle of neutrality might be challenged in conflict settings by those directly affected. For many INGOs in Ukraine, partnering with local organisations that provide support to both civilian and military populations is still an absolute no-go and they prefer to focus only on those working solely with the civilians. At the same time, usually when

it is related to the distributions to hard-to-reach areas, some - rather small and middle-size - INGOs in Ukraine have considered partnerships not only with humanitarian organisations working with civilian population, but also with the organisations assisting both the civilians and the military. The condition is always that these responders do not support the military with humanitarian money and can convincingly prove this.

It is not to say that such organisations send humanitarian assistance to the military; it means that in some exceptional cases, some INGOs can tolerate the fact that their partners support not only civilians, but also the military. As Petr Drbohlav, PIN Regional Director for Eastern Partnership and Balkans puts it: “Humanitarian principles are at the core of our response but they might be mutually exclusive. If you demand that your national partners strictly demonstrate their neutrality, you might at the same time undermine the principle of humanity and their right to protection. Thus, working with organisations supporting both the civilians and military might be the only way to fulfil the humanity principle, under the condition that aid is not diverted to the military. In any case, partnerships with such organisations should not be the normal practice, but rather the last resort⁹”.

This approach could be considered in the localisation policy of INGOs who could adapt their policies to the local environment, taking into account the specific context of localisation in Ukraine. To demonstrate accountability to their governments and citizens, INGOs partnering with organisations supporting both civilians and military could invest more in due diligence, identifying risks and monitoring the implementation of the programmes to make sure that humanitarian funds are ultimately channelled for civilian population only.

Hanna Miedviedieva, Partnership Technical Lead
People in Need Ukraine

“To demonstrate accountability to their governments and citizens, INGOs partnering with organisations supporting both civilians and military could invest more in due diligence, identifying risks and monitoring the implementation of the programmes to make sure that humanitarian funds are ultimately channelled for civilian population only.”

7. National workshop on Localizing humanitarian aid in Ukraine; Kyiv, 17.02.2023

8. Slim, H. [Solidarity, not neutrality, will characterize Western aid to Ukraine](#). Ethics and International Affairs. 10.03.2022

9. Petr Drbohlav, People in Need, Regional Director – Eastern Partnership and Balkans

REINFORCING CAPACITY SHARING AND MUTUAL LEARNING BETWEEN LOCAL AND INTERNATIONAL HUMANITARIAN ACTORS

THE ISSUE

LOCALISATION: EXPLORING A MULTIFACETED AGENDA



Terry Githini, a Partnership & Localisation Advisor with Trócaire, engages with local, national, and international organisations at the annual dialogue meeting on localisation in 2022. ©Photo: Trocaire

The concept of capacity sharing is a relatively new term evolving from a deconstruction of the terms capacity building and capacity strengthening in the context of increased focus on power and discrimination in traditional models of aid.

WHAT IS CAPACITY SHARING?

Trócaire views *capacity sharing* as the deliberate and/or unhindered movement of capacity throughout a system encompassing all who contribute to humanitarian, development, peace and climate action, in the public and private sphere. This includes communities vulnerable to or experiencing crisis. Capacity in this context is understood in all its diverse forms including, but not limited to, experience, technical competency, financial resources, and influence. It is not linear or even necessarily deliberate but rather potentially organic and distinctly multidirectional depending on where capacity demand exists and

“Integral is the belief that capacity exists everywhere, and that we all, regardless of identity, have something more to learn. Better still, capacity sharing has the potential to inspire and build synergies so that the collective is greater than the sum of its parts.”

where existing capacity sits. This we assume is always fluid depending on context. Integral is the belief that capacity exists everywhere, and that we all, regardless of identity, have something more to learn. Better still, capacity sharing has the potential to inspire and build synergies so that the collective is greater than the sum of its parts.

We recognize that the concept of capacity building is often interpreted as a top-down, discriminatory, and even colonial process that is project focused and dismissive of skills, experience and relationships at national or local levels. Capacity strengthening recognises already existing capacities and seeks to complement and strengthen these further. Commonly, both capacity building and strengthening are typically associated with unequal power relations, particularly if there are power imbalances in the partnerships between the actors involved.

CHALLENGES RELATING TO CAPACITY SHARING

The following are challenges that should be considered in relation to capacity sharing:

1. The concept of capacity sharing is often conflated and confused with other concepts such as capacity building or capacity strengthening.
2. The full scope and breadth of existing capacity in all of its diverse forms is not always acknowledged and understood within the humanitarian, development and peace system.
3. There is a risk of capacity sharing initiatives being restricted to and delivered in a linear or hierarchical manner if they remain tied and confined to short-term projects or contractual relationships.
4. Unequal power dynamics within the humanitarian, development, and peace system may influence willingness to share or receive knowledge and may result in not valuing capacity equally.
5. The desire to protect intellectual property may present a barrier to the unhindered sharing of capacity for the broadest impact.

PRINCIPLES OF CAPACITY SHARING

Conceptually, we understand capacity sharing to be based on the following principles:

Capacity exists everywhere: Whether visible or invisible, capacity that can and does save lives, reduce human suffering, and enable early recovery in situations of sudden or slow on-set crises exists within individuals, communities, CSOs and NGOs, the public and private sector at the local, national, and international level, in many different forms everywhere.

Capacity sharing does not occur in a vacuum: Capacity sharing should acknowledge, complement, and build upon existing capacity. The process of capacity sharing should not do harm to any individuals, organisations, or institutions involved in it.



Ahmed Ibrahim, CEO of Arid Lands Development Focus, speaks at a Kenya Charter for Change meeting with local, national, and international organisations. ©Photo: Trocaire

Capacity sharing is not hierarchal: Capacity sharing is continuous, multi-directional, and is not limited by either time or space. Its value is determined not by its origin or scale, but rather by how collectively it best contributes to the lives of those vulnerable to or experiencing crisis.

Capacity sharing enables subsidiarity: Capacity sharing should serve the resource needs of decision makers and actors most proximate to and impacted by crises, conflict and/or development challenges. Capacity sharing transforms power relations.

Capacity sharing is caring: The act of sharing or enabling access to capacity is a demonstration of social responsibility transforming and accelerating the power of others, and the collective, to effect change to the benefit of all.

Capacity sharing is non-transactional: The sharing of capacity is not a process driven by gain or reward by those who hold it. It represents an unhindered and unconditional flow of diverse resources whether deliberate or not in response to a specific demand.

Capacity sharing is inclusive: The process of capacity sharing is not an instrument of power. It should not serve to hold influence, nor exclude or marginalise, but rather promote safe inclusion and participation in a systems approach. This requires self-awareness and discipline.

Capacity sharing requires an enabling environment: The sharing of capacity occurs most effectively and has most impact when it is neither forced nor imposed, and there are no undue restrictions on the agency and autonomy of those who may wish to use it.

➤ EXAMPLE OF CAPACITY SHARING IN PRACTICE – LOCALLY EMBEDDED EARLY WARNING SYSTEMS IN GUATEMALA

An example of capacity sharing in practice took place in San Marcos, Guatemala through the creation of early warning systems (EWS) in areas at risk of flooding. The capacity sharing approach that led to the creation of the EWS drew on existing capacities within Guatemala, including those of the National Coordinator for Disaster Risk Reduction, the government institution responsible for disaster risk reduction (DRR) at the national level. The National Coordinator is the top tier of the DRR system in Guatemala, and it sets the standards that should be followed by municipal and community level coordinators.

Trócaire partners with the organisation Pastoral Social de San Marcos (PSSM), a local Caritas member. PSSM works closely with communities in San Marcos to strengthen DRR mechanisms and set up Community Level Coordinators for Disaster Risk Reduction. PSSM provides support to these Coordinators, including specialised trainings, workshops, and accompaniment in obtaining official accreditation from the National Coordinator. The community coordinators themselves identify whether or not an EWS is needed, based on the contextual knowledge of families living near waterways.

After the needs for the EWS were identified, Trócaire partnered with Galileo University in Guatemala, given their experience in designing, testing, and setting up EWSs. This local expertise was critical in establishing an EWS in the Naranjo River, including monitoring stations at key points in the river basin.

A capacity sharing, research, and collaboration process that took place over months involving communities, municipalities, academics, local authorities, PSSM, and Trócaire resulted in a successful EWS. This system's monitoring stations are equipped with sensors to detect when water levels reach a certain point, which triggers an alert. This is complemented by solar-powered video cameras that provide real time imagery, thus allowing the visual verification of data transmitted by the monitoring stations. The alerts are monitored by volunteers from the Community Level Coordinators and also by the municipality. In the case of a worrying rise in water levels, the municipality can trigger an evacuation notice, giving at-risk communities up to three hours' warning to evacuate.

The EWS on the Naranjo River basin has provided numerous actors with timely, life-saving information. From 2018 to 2019, for example, three major floods occurred. All were detected in advance and evacuation notices were launched by the municipality. Though damages to homes and livelihoods were sustained, no lives were lost.

As a result of this process, a reference manual for the establishment and implementation of EWSs was produced. This has been adopted by the National Coordinator as a key reference document for the setup of EWSs in Guatemala.

This example demonstrates the principles of effective capacity sharing being put into practice. The process to develop the EWSs in Guatemala was based on the idea that capacity existed at numerous levels, including in communities, municipalities, the national government, civil society, and academia. The capacity sharing served a clear need and resulted in effective, life-saving EWSs that supported communities at risk of flooding. Trócaire as an international actor played a facilitative role throughout this process, supporting linkages and creating space for sharing and learning. The model resulted in the creation of a manual that can be shared and utilised throughout the country when developing effective EWSs.

The creation of the EWSs in Guatemala demonstrates the knock-on effects of quality capacity sharing and how multiple actors within the system have a role to play throughout this process. It also illustrates how effective capacity sharing can only occur within an enabling environment that allows for the unhindered flow of knowledge and resources.



Coordination of delegate of the National Coordinator for Disaster Reduction -CONRED- San Marcos headquarters (Franz Kiss) and local volunteers (Israel Barrios) for the maintenance of cameras and level sensor of the Early Warning System -SAT- for floods in the Naranjo River Basin. PUEBLO NUEVO monitoring station, La Blanca, San Marcos, year 2023. ©Photo: Ana Eugenia Reyna /CARITAS Social Pastoral of San Marcos.

Michael Solis, Global Director – Partnership & Localisation
Colm Byrne, Gender and Humanitarian Advocacy Advisor
Helen Kangiri, Capacity Strengthening Advisor
Trócaire

RECONNECTING HOPE: TSF ON THE IMPORTANCE OF COMMUNICATION FOR PEOPLE IN CRISES

A CLOSER LOOK



A building standing in the middle of rubble, in Kahramanmaraş, one of the areas where networks were impacted the most. ©Photo: Télécoms Sans Frontières

When the 7.8 and 7.7 magnitude earthquakes hit southern Turkey and North Syria on 6 February, we at Telecoms Without Borders (TSF) were immediately on high alert. Natural disasters can destroy communication infrastructure, impact electricity which affects networks, and saturate networks when affected people try to reach their loved ones. The earthquake was the deadliest worldwide since the 2010 Haiti earthquake, with more than 50,300 casualties in Turkey and Syria ([UNICEF, 2023](#)).

After 25 years of responding to these kinds of crises, our team of highly-trained ICT specialists was ready to respond and be deployed quickly to Turkey in the early hours of 7 February. The team headed to Hatay and Kahramanmaraş, two of the areas most affected by the earthquakes in Turkey, to provide connectivity and support the coordination of humanitarian organisations' relief efforts. In Syria, the earthquake worsened an already dire situation. With the country at war for 12 years, the economy, infrastructure and health system struggled to cope with the disaster.



The streets of Kahramanmaraş. ©Photo: Télécoms Sans Frontières

“Given the opportunity to hear their loved ones’ voices in real-time after days of nerve-wracking waiting and uncertainty, people did not hesitate to queue for kilometres. The importance of reconnecting communication, reconnecting people after a crisis, was impossible to ignore.”

TSF has been supporting civilians affected by the war in Syria for 11 years. In the medical facilities of the Union of Medical Care and Relief Organizations (UOSSM), reliable connectivity provided by TSF supports daily activities from teleconsultations to logistics and coordination. When the earthquake struck, the White Helmets organisation also needed emergency communications to connect their headquarters and mobile dispatchers, who could, in turn, send ambulances to those in need. TSF, therefore, provided mobile terminals and also extended its support to three new UOSSM medical facilities.

As well as supporting NGOs in the relief efforts and their coordination, the original driving force of TSF is to help people reconnect with their loved ones.

While working as volunteers in several humanitarian missions, the founders of the future TSF kept bringing home phone numbers and messages to be sent. They thought that rather than collecting messages, they could bring a phone, connected by satellite, directly in the field. Given the opportunity to hear their loved ones’ voices in real-time after days of nerve-wracking waiting and uncertainty, people did not hesitate to queue for kilometres. The importance of reconnecting communication, reconnecting people after a crisis, was impossible to ignore.

Telecommunications have evolved in 25 years, and so has TSF. The Internet has become an important part of the way everyone communicates and shares information, and we take this into account in our work with people affected by crises. We focus on 3 main points: connectivity, access to reliable information, and digital inclusion.

In Ukraine, millions of people were forced to leave their home, and many are sheltered in temporary centres where they need connectivity to keep contact with their loved ones and sometimes continue to work remotely. One of TSF’s objectives in Ukraine is to ensure that these shelters have available connectivity, in partnership with the managing Ukrainian organisations.



Marta Moreton, ICT specialist and Head of Mission, on her way to Gaziantep. ©Photo: Télécoms Sans Frontières

In 2022, 100 million people were displaced worldwide ([UNHCR, 2022](#)). Displaced people often lack reliable information about their options, so TSF centralises trustworthy and reliable information from a network of humanitarian bodies. Information is displayed in welcome centres with a focus on refugees’ rights, administrative procedures, mental health, and educational content for children.

Lack of access to technology or lack of digital literacy can cause inequality in access to information, education, and resources. There were 2.7 billion people offline in 2022 ([ITU, 2022](#)), and even though mobile services prices are lower, they’re still too high for many. In Madagascar, we are working to bridge the digital divide by introducing computer literacy to young people, some of whom have never used a computer before.

Communication is essential in our lives. It is even more so in humanitarian crisis situations. For organisations, connectivity facilitates coordination, both for immediate relief operations and for long-term projects. For people affected by crises, access to communication and information is a way to regain hope after hearing from loved ones and to make informed choices.

Inès Guittonneau, Communications Officer
Télécoms Sans Frontières

Interview with Jan Egeland

Eminent Person of The Grand Bargain and Secretary General of the Norwegian Refugee Council

VIEWS ON THE EU



- > 1. In 2021, VOICE members adopted a Policy Resolution “Grand Bargain 2.0: let’s make it a turning point in the global humanitarian aid system” calling on the EU and its Member States to make tangible progress in the next few years on the following Grand Bargain (GB) priorities and themes: localisation, harmonisation, and simplification and quality funding. Where are we at in 2023 with the Grand Bargain progress?

Over the past two years, the Grand Bargain has achieved some important steps in the right direction. Many donors and big implementers in the system have recognised the importance of quality, predictable funding, and have made commitments to increase the share of multiyear funding that they disburse or cascade to frontline organisations. We have created a new model for cash coordination, an issue that remained unresolved for almost a decade. Through the caucuses on the role of intermediaries and on funding for localisation, many organisations have made clear commitments to strengthen the quality of their partnerships, and to develop roadmaps on how and when to achieve the 25% target for funding channelled to and through local actors.

Although the Grand Bargain may not yet have transformed the system in the ways we had hoped, it would be wrong to say it hasn’t achieved results. There are many incremental changes in individual organisations - including in some of the big players in the system- that would not have happened without the Grand Bargain.

- > 2. The topic of this VOICE out loud is localisation. Have you seen any progress on this over the past years? To what extent the GB caucuses on the role of intermediaries and funding for localisation are expected to be game changers in the discussion?

When Signatories agreed on the structure and focus of the GB 2.0, localisation was elevated to become one of the two enabling priorities of the Grand Bargain. Achieving localisation is key for a more efficient, effective, and relevant humanitarian system. Localisation has been a key priority for the Grand Bargain since its start, with a key focus on achieving 25% of humanitarian funding going to and through local and national NGOs. The system as a whole is far from reaching this target (according to current figures, direct funding to local and national actors is below 3%), and so one might think that we have totally failed localisation. But, I think that the system is moving in the right direction. Every major donor and major organisation that also acts as an intermediary now has policies, targets, and guidelines on localisation. We all want, and need, to do better. Both caucuses, the one on the role of intermediaries and the one on funding for localisation which I co-chaired with NEAR, provide a very useful framework for implementing these commitments. Signatories who adopted the caucuses’ outcomes demonstrate that there is a willingness to change, and this paved the way for others to follow. UN agencies now say that a large portion of their funding is going to and through local groups.

- > 3. According to Grand Bargain 2.0's priorities, localisation is critical for more effective aid. Even though there seems to be common agreement on this, many barriers remain. According to your experience as Eminent Person, what are those main blockages, at the leadership level, to move forward with the agenda?**

When we talk about the 25% target, there are indeed many barriers. Some donors mention that their bureaucracy, legal frameworks, or processes prevent them from funding directly local and national actors. Others have very limited presence in the field and few staff in capitals, and thus prefer to directly fund UN agencies or big INGOs in order to manage fewer grants. Other donors have very heavy compliance regimes, requiring NGOs to use large number of staff to manage all aspects of that partnership – some local and national actors simply don't have the capacity to manage these partnerships. From my perspective as EP, these are some of the barriers to moving forward on the funding aspect of localisation. To move forward, we should go back to some of the other original commitments in the Grand Bargain and agree to simplify and harmonise processes like due diligence and compliance. But mostly, there needs to be a big push from the top to enable these changes. Leaders from donor agencies, UN and INGOs to walk the talk. The NGO that I lead, the Norwegian Refugee Council, has hundreds of partnerships with local actors but the quality is not always great – for example, until very recently we would not share our overheads with them. This has now changed and NRC has developed a policy requiring that overhead funding is provided for local implementing partners in all NRC agreements. This marks an important change; one that will require donors to play ball. We will ask the donors to give local actors the same that they give to us, which is 7 per cent: that is, 7 per cent for us, 7 per cent for them. If donors are not willing to provide the additional 7 per cent to local groups, and NRC has to share the 7 per cent in overhead funding with a partner, then 4 per cent will go to the local group.

- > 4. The European Humanitarian Forum in Brussels on 20-21 March brought together humanitarian actors and EU stakeholders to discuss several issues affecting the delivery of humanitarian aid. Do you consider that the GB was featured enough in the forum discussions?**

Absolutely - I was pleased to see the Grand Bargain featuring high on the agenda of the European Humanitarian Forum again this year. We cannot really talk about the delivery of humanitarian aid without touching upon the Grand Bargain. In a context where needs continue to grow, we really need to live up our commitments and focus on efficiency and effectiveness.

At this year's EHF, DG ECHO also presented their localisation guidance – this is a major achievement for DG ECHO, and a step in the right direction.

- > 5. This year's Annual Meeting on 19 and 20 June 2023 will mark the end of the Grand Bargain 2.0. What do you think will be the future of the Grand Bargain?**

Indeed, the current phase of the Grand Bargain is about to end. Together with the Facilitation Group, which is in many ways the steering committee of the Grand Bargain, discussions are ongoing on what the next phase will look like. Many consultations have taken place with all Signatories, and what has emerged is a desire by all to keep this platform. It is clear that, despite the many achievements, we still have a long way to go to fully realise our commitments. Quality funding, localisation, and participation remain more relevant than ever. But we might also need to look back at the recommendations of the High Level Panel on Financing and re-consider the Grand Bargain with respect to the other pillars.

The Grand Bargain remains the only platform where all actors, donors, UN agencies, the Red Cross and Red Crescent Movement, INGOs, and local and national actors have an equal seat around the table. I will hand over my role to a successor.



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VOICE is the network of 86 European NGOs promoting principled and people-centred humanitarian aid. Collectively, VOICE aims to improve the quality and effectiveness of the European Union and its Member States' humanitarian aid. The network promotes the added value of NGOs as key humanitarian actors.

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