

MORE THAN THE MONEY:

Localisation in Practice



FINAL REPORT • JULY 2017

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Acknowledgements

Trócaire and Groupe URD would like to thank all the contributors to this report, particularly the national and local organisations who gave their time freely and willingly to share their perspectives on the humanitarian system, and in particular localisation – a concept that is not new, but is now at the fore of discussions at a time of renewed energy and commitment to proactively and concretely promote and support the role of local actors in humanitarian action.

We would also like to thank the international NGOs, UN agencies, Donor representatives consulted as part of this study. Particular thanks to staff of Trócaire Myanmar, the staff of Trócaire DRC, the local and national authorities in both countries who willingly gave up their time to engage in discussions and debates on this important issue, providing vital perspectives that are recorded in this report.

The research was overseen by Réiseal Ní Chéilleachair, with technical input from Birke Herzbruch, Saah Nyambe Lebreton, Obed Buhendwa, Conor O'Loughlin, and Noreen Gumbo.

“While the international community is guided by deadlines and guidelines, local actors here are caught between front lines and ethnic lines.”

Myanmar National NGO staff

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Acronyms

CAR	Central African Republic
CBO	Community Based Organisation
CBPF	Country Based Pooled Fund
CHS	Core Humanitarian Standard
CSO	Civil Society Organisation
DFID	Department for International Development (UK)
DRC	Democratic Republic of Congo
DREF	Disaster Relief Emergency Fund (IFRC)
ECHO	Directorate-General for European Civil Protection and Humanitarian Aid Operations
Groupe URD	Groupe Urgence Réhabilitation Développement
HARP	Humanitarian and Resilience Program
HCT	Humanitarian Country Team
IASC	Inter-Agency Standing Committee
IDP	Internally Displaced People
INGO	International Non-Governmental Organisation
LRRD	Linking Relief Rehabilitation and Development
MONUSCO	United Nations Organisation Stabilisation Mission in the Democratic Republic of the Congo
NDMA	National Disaster Management Agencies
NFI	Non Food Items
NGO	Non-Governmental Organisation
OCHA	United Nations Office for the Coordination of Humanitarian Affairs
UN	United Nations
UNHCR	United Nations High Commissioner for Refugees
US	United States of America
USAID	United States Agency for International Development
WHS	World Humanitarian Summit

Executive Summary

The term 'localisation' has become the buzzword of 2017, a subject that has taken on a new dimension due to the commitments made as part of the Grand Bargain agreed at the World Humanitarian Summit in May 2016. International agencies are paying more attention to the role of local and national organisations while national actors want to play a bigger role in humanitarian response and be recognised as major players in first line response.

While a number of humanitarian organisations work systematically with local partners, for others, it is primarily a way of gaining access to difficult regions or a way of saving money in a context where there is pressure from donors to cut costs.

From 2015, Trócaire engaged actively in discussions and preparations ahead of the World Humanitarian Summit with senior representation at the Summit, including Trócaire's Executive Director and the Country Director from Trócaire Myanmar. Trócaire also featured in the Summit publication 'Together We stand'¹ with partner organisations in Sierra Leone. In June 2016, Trócaire participated in the post-Summit review "Game-changer or business as usual – Reflection on the World Humanitarian Summit"² in Ireland where agency directors were asked to identify one of the commitments that they would make progress on. As a partnership organisation since it was established in 1973, as a signatory to the *Charter4Change*, and a signatory to the WHS submission of Caritas Internationalis, focusing on localisation was an obvious choice for Trócaire. The organisation subsequently launched the study "More than the Money: Localisation in Practice" in December 2016.

Aid localisation is a collective process involving different stakeholders that aims to return local actors, whether civil society organisations or local public institutions, to the centre of the humanitarian system with a greater role in humanitarian response. It can take a number of forms: strengthened and more equal partnerships between international and local actors, increased and "as direct as possible" funding for local organisations, and a more central role in aid coordination. Underpinning this is the question of

“ Localisation requires a shift in power relations between actors, both in terms of strategic decision-making and control of resources.

power. Localisation requires a shift in power relations between actors, both in terms of strategic decision-making and control of resources.

While the role of state bodies has been recognised in theory in international texts for a long time (the Geneva Conventions, and United Nations General Assembly Resolutions), they have only been taken into account in humanitarian response and coordination relatively recently. Their role in humanitarian affairs remains relatively marginal and can be problematic, depending on context. State representatives generally take part in coordination mechanisms but do not play a significant role; they may play a technical role, but do not seem to be fully part of the system. Thus, even though all actors are aware that, in the long term, it is the local authorities who should have ultimate responsibility for relief and protection activities, as well as coordination, handover strategies are lacking in many contexts and coordination remains centred around international actors.

Civil society organisations at local and national levels are increasingly operational. They have access to regions where international actors are unable to go and are active in numerous sectors and aspects of humanitarian action. However, globally there continues to be a significant imbalance in financial allocations. Access to *direct* funding is increasingly a central demand of national organisations, but the number of funding windows available to them is limited. The main humanitarian donors are still reluctant to fund national and local organisations directly. Donor procedures and stringent accountability measures mean that they generally prefer to finance international agencies (UN and NGOs). In this context,

¹ <http://digital.tudor-rose.co.uk/together-we-stand/#130/z>

² http://cha.ucd.ie/sh_events/game-changer-or-business-as-usual-seminar-discusses-the-world-humanitarian-summit/

Country Based Pooled Funds play an increasingly important role in channelling funds to local NGOs though localisation in practice must go far beyond funding.

The representation and role of national and local organisations in coordination mechanisms has evolved in recent years. However, it is only through sustained advocacy work by both national and international NGOs, that seats for national actors on Humanitarian Country Teams have been won. The successful integration of national actors into humanitarian coordination mechanisms is very much a work in progress.

This research was conducted in two contexts – Myanmar and the Democratic Republic of Congo - and included extensive consultation locally and internationally. Observations and exchanges with local and international actors identified three main approaches to partnerships and the role of local actors in humanitarian response: (1) the sub-contracting approach where partnerships are oriented towards meeting the objectives established by the international organisation, which have often been agreed in advance with the donor; (2) the locally-led response approach, whereby the local actor defines the vision and the strategy and the international actor then provides support; and (3) the direct approach, where the international actor provides support directly to the affected community and has little interaction with local NGOs, perhaps only to obtain information about needs. Some agencies might use a combination of these different approaches.

Six major issues linked to localisation emerged from the study : (1) heightened tension between international and national actors, (2) critical analysis of the humanitarian sector by local and national actors, (3) the question of humanitarian principles, (4) security management and risk transfer, (5) direct funding and accountability, and lastly (6) Linking Relief Rehabilitation and Development (LRRD). National and local actors are often frustrated by narrow sector coordination, their exclusion from key fora and the power dynamics in decision-making.

Though national and local NGOs recognise the positive input and constructive interaction that has contributed to their growth, there are many areas of tension, such as: the greater difficulty local actors face in accessing

funding and the heightened competition between international and national actors; the limited overhead costs available to local actors; issues of respect and equal treatment between local and international; the difficulty local actors face gaining access to information and the complexity of donor reporting procedures. The research found that the localisation 'agenda' is a Pandora's Box of issues linked to the political economy of aid and North/South relations. If it is badly managed, it could potentially create or worsen tensions between local and international actors.

The aid system has become standardised and more complex over the years. International organisations currently use a number of standards (Sphere and the CHS), guidelines and processes (cluster mechanisms, response cycles and HRP, etc.) in order to respond to different humanitarian situations in a responsible, predictable and coherent manner. In terms of localisation and reinforcing the capacities of local partners, the temptation is to impose a replicated system of the same norms, standards and procedures on national and local actors, which would potentially lead to a loss of diversity and specific characteristics. However, as localisation helps to promote resilience and sustainability by doing things differently, all humanitarian actors must adapt programmes to context and promote difference and diversity.

Many international stakeholders express concern about whether humanitarian principles, particularly impartiality and neutrality, can be respected by local organisations. The meaning of 'neutrality' and 'impartiality' needs to be examined in the context of the localisation agenda. The study raises important questions about whether these principles apply at both the local level and higher levels such as the crisis or country level, or is it the aid response as a whole that should be neutral and impartial and not each project or partner individually? These are difficult and challenging questions.

Another area of tension is related to partnerships with local NGOs: one of their major strengths is the ties that they have with local communities. However, these ties can also be a source of problems and agencies that work with local NGOs need to pay particular attention to this.

One of the clear advantages of working with local actors in highly insecure areas that are inaccessible to international organisations is the fact that they are subject to fewer security constraints, or, in other words, they take greater risks. This is one of the essential reasons that has brought localisation to the fore globally. International actors increasingly engage with local actors ('remote-control', 'sub-contracting' or 'partnerships'), but it is rare that the increased risks for local actors are recognised. Local actors often have fewer logistical resources (vehicles, means of communication, physical protection) and are less well prepared in terms of security procedures and training compared to their international partners. It is no surprise then that the casualty rates among national humanitarian workers are highest. In the event of a security problem, local actors often do not have the same protection or solutions as international actors. This difference in treatment, notably during evacuations, is often viewed as an injustice and raises important ethical questions.

A key constraint for donors (and consequently for humanitarian response) is the size of the projects local NGOs can implement. The approach of many donors to localisation is therefore to work through Country Based Pooled Funds or international agencies. The lack of clarity about what is meant exactly in the Grand Bargain by "local responders" and "as directly as possible" is a source of tension in localisation debates.

Lastly, aid localisation is very much related to the Humanitarian-Development nexus and these two work streams of the Grand Bargain³ should be considered as intrinsically linked. In general, the local actors who deliver humanitarian assistance are often involved in development activities before and after the humanitarian crisis. They often have both humanitarian and development partnerships and projects with different timeframes and different types of funding. However, the economic models involved are radically different and the amounts involved in humanitarian responses are not comparable to the smaller budgets of development programmes. If localisation means that more resources should be directly transferred to local NGOs, how can a "humanitarian bubble" be avoided which would risk making these organisations dependent on external aid and vulnerable to the often brutal rise and fall in humanitarian funding?

The World Humanitarian Summit and initiatives related to localisation, such as *Charter4Change*, *Shifting the Power* and exchanges in connection with this study, are having a significant influence in raising awareness among local and national actors of their role in humanitarian response. They are increasingly the direct, front line players in responses.

Localisation as a concept is gaining ground and is changing narratives and positions not only at the international level, but also at the local level. Local organisations are growing in strength and impact, becoming more organized, informed, and engaged. Yet, the localisation debate remains essentially conceptual and the majority of discussions about meeting the commitments of the Grand Bargain are currently taking place at the international level, with limited engagement from local actors, and are primarily focused on the issue of funding.

This research will help to direct the conversation towards practical and operational considerations and secure concrete shifts in how humanitarian action can be more inclusive and aware of the intractable connectedness of humanitarian and development action. One year on from the World Humanitarian Summit, the future of the sector depends on how stakeholders manage to meet the commitments of the Grand Bargain and on how 'local' the localisation debate is in reality.

Trócaire's work is guided by the principles of Solidarity, Participation, Perseverance, Courage and Accountability. The organisation's commitment to partnership is based on respect and mutual collaboration, underpinned by the principle of subsidiarity, that decision-making and authority is exercised at a level that is at the closest appropriate level to partners and communities. Essentially, partnership is in the DNA of Trócaire.

In commissioning this study, Trócaire specified that the main outcome would be a series of recommendations to the organisation to progress commitments to localisation. Recognising the need to change and adapt to global shifts in humanitarian

³. Workstream 2 : National and Local Responders : Localisation
Workstream 10 : Strengthening engagement between humanitarian and development actors

action, the organisation believes that change has to happen at all levels for The Grand Bargain to be a successful recipe for improvement. As an organization that works with a diverse network of partners across the world, this report will guide Trócaire's work in strengthening partnerships and in advocating for greater equity within the global humanitarian system.

While this research was commissioned primarily to inform Trócaire's work, the recommendations are relevant to international and national organisations engaged in policy debates, advocacy and practical shifts in funding and support towards greater localisation in the humanitarian sector.

Recommendations for Trócaire

Partnership policy

Trócaire should update its partnership policy, drawing on decades of experience to strengthen humanitarian and development partnerships. In particular it should:

- Review funding strategies to avoid competing with local partners over the same funding sources (e.g. CBPF), and prioritise funding opportunities not directly accessible to local organisations;
- Avoid cyclical short-term project-based approaches that do not effectively support partners to strengthen their operational and institutional capacities;
- Commit to partnerships beyond the length of a contract via a Memorandum of Understanding that captures shared ambitions and goals, linked to longer term strategic objectives.
- Work with partners to develop institutional funding strategies that include analysis on minimum core costs required for 'lean' periods (i.e. in between grants)
- Support partners in receipt of funds indirectly, in partnership with Trócaire to plan for strengthening systems and competencies to gradually receive large grants and manage higher levels of risk

- Increase consortium approaches with local partners in order to provide them with new funding opportunities and approaches to funding and jointly advocate with donors on the value of the contribution of each actor within the consortium,
- Work with partners to advocate with donors for multiyear funding in specific contexts, especially protracted settings which sit between humanitarian and development contexts
- Work strategically with partners on organisational capacity building & capacity strengthening methods, cognisant of other capacity building endeavours underway supported by other donors (e.g. secondment, multi-year support, etc.)
- Develop a framework to evaluate/value the capacity building support provided by Trócaire to partners
- Explore how capacity building towards sustainable organisations can be provided within the current funding environment with specific attention to women-led organisations and the promotion and retention of women in local NGOs
- Work with local partners to secure specific funding for institutional capacity building
- Engage in medium- and long-term strategic thinking with partners about their economic models, financial sustainability and strategic approaches to link relief and development.

Supporting local civil society in humanitarian settings

- Encourage and actively facilitate exchanges between international donors/partners of the same local organisation to move from a project-based approach to an institution strengthening approach.
- Support the coordination of local NGOs to strengthen local civil society and establish more strategic links for advocacy with *Shifting the Power*⁴;
- Support and foster local learning, and the exchange of experiences and innovations between local actors as well as between local and international actors.

⁴ <http://www.actionaid.org/publications/shifting-power>

Localisation

- In all advocacy on localisation, Trócaire should include the Grand Bargain commitment to increase and support *“multi-year investment in the institutional capacities of local and national responders through collaboration with development partners and incorporating capacity strengthening in partnership agreements”* which tends to be forgotten in favour of the commitment to increase direct funding.
- Trócaire should advocate and actively support the inclusion of local partners in global discussions about localisation or organising global exchanges at the local level to ensure local actors are able to contribute to the discussions so that their views are heard and challenges are recognised and explored.
- Trócaire should raise awareness at country level and in international forums about the risks related to localisation if it is not managed well at the global level.

Making funding work to support localisation commitments

This research has prompted dialogue between Trócaire, our direct partners, and other national and international actors. Donors are also exploring how to meet commitments of the Grand Bargain, particularly on Localisation. There are a host of dynamics connected to strengthening the role and expanding the space for local and national actors in humanitarian action. Partners repeatedly list specific steps that would make their work easier, strengthen their capacity and sustain their capability to respond to crises. These steps listed below are relevant to Grand Bargain Signatories, international NGOs and International Organisations, and donors- especially those present and engaged in humanitarian dialogue, via Humanitarian Country Team membership, and those keen to support local actors directly in a strategic and comprehensive way. They are:

- 1. Increase flexible administrative costs** - Recognise the limitations on local actors that have limited access to unrestricted funding or flexible funding to cover core costs to critical support systems such as Human Resources, Logistics and Finance. Short-term commitments of support that are project-based assume that national NGOs have other sources of income to cover gaps – most do not;
- 2. Plan in years, not in months** - Transitioning funding from INGOs to local actors should not be a kneejerk to the Grand Bargain but a phased, well-planned and negotiated process, whereby local actors are adequately positioned, with the requisite organisational infrastructure and humanitarian technical capacity to take on the increased risk and demands;
- 3. Promote smart, strategic capacity support** - Capacity-strengthening, (both technical and organisational) must be strategic and complimentary, supporting the strategy of the organisation, beyond the lifetime of any one particular grant;
- 4. Be transparent on funding availability and eligibility** - Mindful of the time and resources required to prepare proposals. Open calls for proposals when selected partnerships will have an advantage are demoralising and frustrating for local actors;
- 5. Acknowledge the cost of engagement to local actors** - Engage in discussion with local actors to understand the steps of securing funding, the logistical challenges of maintaining a consistent presence within the cluster system, the cost of this and develop an understanding of how local organisations cover these costs to respond to varied demands from donors and partners.

1. Introduction

1.1 Background

Local actors are increasingly recognised as essential players in humanitarian response. Their geographical and cultural proximity as well as their low structural costs are major assets. They are often the first to act in the early stages of an emergency, and in some insecure contexts, they are alone in being able to deliver humanitarian aid. Yet, the aid system remains primarily organized around international actors. The concept of localisation has been propelled to the forefront of humanitarian debates as a result of the World Humanitarian Summit. A number of international and local organisations have committed themselves to a series of changes through the *Charter4change*⁵ and the Grand Bargain initiatives and the localisation debate is ongoing.

As expressed during the regional consultations in preparation of the WHS, local actors want more responsibility, greater direct access to funding and recognition of the central role local actors often take in humanitarian action.

Localisation aims to improve the effectiveness and relevance of aid in the short term and its impacts in the long term, but it also raises a number of ethical, political, and economic questions, and has implications for working methods and humanitarian principles.

Trócaire has a long history of working in partnership with local actors since its foundation in 1973, including in response to humanitarian needs⁷. The organisation is keen to improve its partnership approach, shift to “greater localisation” and contribute to the localisation process at a global level. With this goal in mind, Trócaire launched a study entitled “More than the Money”. This report presents the main findings of this study.

Commitments agreed by Grand Bargain Sherpas⁶:

Aid organisations and donors commit to:

1. Increase and support multi-year investment in the institutional capacities of local and national responders, including preparedness, response and coordination capacities, especially in fragile contexts and where communities are vulnerable to armed conflicts, disasters, recurrent outbreaks and the effects of climate change. We should achieve this through collaboration with development partners and incorporate capacity strengthening in partnership agreements.
2. Understand better and work to remove or reduce barriers that prevent organisations and donors from partnering with local and national responders in order to lessen their administrative burden.
3. Support and complement national coordination mechanisms where they exist and include local and national responders in international coordination mechanisms as appropriate and in keeping with humanitarian principles.
4. Achieve by 2020 a global, aggregated target of at least 25 per cent of humanitarian funding to local and national responders as directly as possible to improve outcomes for affected people and reduce transactional costs.
5. Develop, with the Inter-Agency Standing Committee (IASC), and apply a ‘localisation’ marker to measure direct and indirect funding to local and national responders.
6. Make greater use of funding tools which increase and improve assistance delivered by local and national responders, such as UN-led country-based pooled funds (CBPF), IFRC Disaster Relief Emergency Fund (DREF) and NGO-led and other pooled funds.

⁵ Trócaire is a signatory of the Charter <https://charter4change.org/>

⁶ The Grand Bargain explained: An ICVA briefing paper (March 2017)

⁷ see on www.Trócaire.org

1.2 Methodology

The study adopted an inductive approach. Based on a desk review and semi-structured interviews carried out during two field visits, the study team (Groupe URD and Trócaire) analysed patterns, similarities and context-specific examples in order to establish a definition of 'localisation' and present the main challenges involved.

The study included the following:

- A literature review carried out by the study team with support from Groupe URD's Resource Centre;
- Two field visits (Myanmar and DRC) to interview a broad range of aid stakeholders, including field workers and local actors, to gather their views about aid localisation. An aide-memoire was written for each field visit. These were shared with field teams allowing discussions to continue after the study team left the respective regions.
- Discussions with the Trócaire team in Ireland before and after the field visits.

This report is organized as follows: the first section proposes a conceptual framework for the debate with a definition of localisation and a typology of organisations that it concerns; the second provides an overview of the current position of local organisations in the humanitarian system; and the third analyses the six main issues related to localisation that emerged from the study.

The report does not claim to cover all the issues at stake or to answer all the fundamental questions raised by the subject. It is an attempt to learn from experiences in the field so that the ongoing debate and decisions are informed by contextual realities.

The contexts in a nutshell

	MYANMAR	DRC
Areas/ region	Kachin State	Ituri
Context	Conflict existing since more than 60 years	Conflict developing during the last decade
Nature of the State	Strong State at the Federal and regional level	Weak state at the central level, very weak at the local level
Types of partners	Relatively strong civil society structures	Local Caritas and a complex galaxy of smaller structures
Types of programmes	Humanitarian response for IDPs camps	Support to IDPs and host communities
Constraints	Access constraints imposed by the government	Access constraints linked to security and logistics

2. Defining Localisation and establishing a typology of organisations that it concerns

In order to analyse the issues raised by aid localisation, a certain amount of semantic clarification is needed. First of all, we need to define localisation (2.1) by describing its objectives and its methods, and secondly, we need to define the types of organisations that localisation concerns (2.2).

2.1 Definition of localisation

There is not yet a global and accepted definition of aid localisation. When conducting the research, the team had to frame the discussion around the different components of this concept in order to clarify the issues at stake and collect feedback about them. In doing so, the following common definition emerged:

Localisation of humanitarian aid is a collective process by the different stakeholders of the humanitarian system (donors, United Nations agencies, NGOs) which aims to return local actors (local authorities or civil society) to the centre of the response with a greater, more central role.

In addition to enable a more effective and efficient humanitarian response, the long-term aim of localisation is to build the resilience of crisis-affected communities by establishing links with development activities.

Localisation can take a number of forms: increased and more equitable partnerships between international and local actors; increased and more direct funding of local organisations; or a greater role for local actors in delivering and coordinating aid.

This definition specifies that localisation must be a collective process: localisation cannot simply be imposed by decree, but rather depends on sustained effort on the part of a large number of actors. It concerns both civil society organisations and local public institutions and therefore involves the different roles and responsibilities that exist among aid stakeholders, including NGOs, international organisations and state representatives. An increased role for local actors requires clear understanding

Figure 1: Proposed Theory of Change for Localisation

WHAT FOR?	More resilient communities and societies		
WHO?	People and communities	Local and national NGOs	Local and national authorities
HOW?	Better organised to cope with disasters	Better prepared and equipped for humanitarian response	Enabling and participating in humanitarian response
	DRR activities at community level, supports civil society organisations	Capacity building activities, institutional support and preparedness plans	Advocacy and inclusive preparedness and response plans

of what they can and cannot do with regard to humanitarian action. Localisation can therefore be seen as an advocacy issue with the aim of mobilizing and supporting the different stakeholders concerned, including local actors themselves.

A variety of reasons can be given for promoting localisation. For some, it is to reduce costs and increase efficiency, for others, it is to increase effectiveness and relevance. However, all those consulted involved in localisation in one way or another agreed that the ultimate added value of this approach is the sustainability of projects beyond the emergency phase. In the medium- to long-term, the aim is to reinforce the resilience of communities and societies, including by investing in preparedness and reinforcing institutions.

One of the main ideas related to the localisation debate, referred to in the title of this report, is that it is about more than just financial transfers. It is about establishing new relations between actors, both in terms of who defines strategy and who controls resources.



Localisation means that local actors should be given more space so they can better participate, shape the situation and positively contribute to the collective work.

Trócaire partner in Myanmar

In terms of historic North-South relations and the interaction between organisations from the north and the south, the adoption of a localisation agenda requires a paradigm shift. This was clear from discussions in the field, especially among local actors, as reported in Section 3 of this report, and to a lesser extent among international actors.

2.2 Typology of local actors

In order to be able to work with, for or through local actors, it is necessary to be able to identify and understand the diversity of a broad range of actors. Their nature and capacities vary and they are the result of very different trajectories. Many of the problems with regard to putting localisation into practice come from a lack of understanding of local actors. There is therefore a need for clarification.

Identifying the local actors in each specific context is an essential first step before the concept of localisation can be implemented in practice: the issues at stake are not the same for an open conflict, a complex extended crisis, a drought or a rapid-onset natural disaster. Identifying capacities in terms of preparedness, rapidity of response, access, agility, respect for humanitarian principles, accountability, sustainability and prevention in these different types of contexts allows the concept of localisation to be put into practice beyond assumptions and “politically correct” posturing.

2.2.1 Public bodies

The localisation of aid depends, first of all, on the role of public bodies being recognised. However, this is often overlooked in international discussions on the subject. The fact that there is a risk of politicisation in certain contexts (mainly conflict situations) should not prevent engagement with public bodies in other contexts (e.g. natural disasters).

Public bodies include **state institutions** in charge of law and order, social justice, international relations and security. These state institutions often decide whether international actors can or cannot gain access to countries and crisis zones, and they accord visas and travel permits. They contribute to levels of security, whether positively or negatively. They are in charge of customs and clearance mechanisms, which allow relief items, vehicles, telecommunications equipment, etc. to enter into the country.

Another type of state body is the **technical ministry** (Health, Agriculture, Urban Planning, etc.). These have a normative, an operational and a coordination role. They include National Disaster Management Agencies (NDMA) who are front line actors in the initial response immediately after a disaster, and who are often attached to political institutions: the Ministry of the Interior, the Prime Minister’s office, the President’s office, etc.

These national public bodies are in charge of defining norms, such as “public health packages”, and the types of food or seeds that can be imported, and they decide which buildings are to be destroyed and which not after an earthquake. They also have a direct role: in theory, they are responsible for running early

warning systems related to climate and health. Civil Protection Forces have an important role in providing relief during acute emergency phases. Finally, these institutions play an essential coordination role both in terms of changing needs and coordinating operations.

In the field, **regional administrations** represent central ministries and the national administration at the local level: the efforts of local representatives and governors can be decisive during a humanitarian response, whether in terms of facilitating or blocking it.

Alongside these are the **decentralised authorities** in charge of regional, departmental and municipal governance. These are often elected, have close ties with their fellow citizens and can be an opposition force in relation to the national system. They are responsible for key security operations with the police and other security forces. They often give aid organisations significant geographical and operational guidance, but can also create barriers for aid.

In many conflict situations, there are also 'de facto' authorities who play an essential role, but whose legitimacy and status may be disputed. Working with authorities of this kind raises a particular set of challenges which are not covered in this report.

2.2.2 Civil society organisations

Even though categories are often based on oversimplification, it is important to establish a typology of local civil society organisations in order to apply the localisation concept to reality:

Closest to the grassroots are community-based organisations: these are limited to the community level and are made up of community members, without any legal status, essentially working for the benefit of the community alone. In many countries, these are extremely important organisations. They can take the form of village associations, whose aim is to defend the interests of the village, or can bring together a certain age group, playing a key role in inter-generational communication or transmission of knowledge or commitments across the community.

Local NGOs represent a higher level of social structure: They exist at the level of a territory, and are either specialized in a particular area (Health,

Agriculture, Women's Rights, etc.), or, very frequently, are non-specialised, and work towards local development. Generally their status is recognized by the Law nationally, and they are registered locally. In certain countries, such as Democratic Republic of Congo (DRC), the fact that state institutions were dysfunctional for several decades led to the emergence of a wide range of local actors, often linked to churches, which provide basic services such as health and education. There is also the reactive and opportunistic creation of NGOs in order to have access to resources in a context of high unemployment where humanitarian aid is a major economic sector. In other contexts, such as Myanmar, there can be tension between local NGOs and the central power. NGOs that campaign for the rights of a particular group or on a specific issue may be perceived as a political opposition force.

National NGOs – well-established organisations that take action at the national level. In certain cases, these are local NGOs who have become involved in campaigns beyond their home territory. They may have been created with a national vision by charismatic individuals from the country or individuals who have gained experience abroad and have returned to invest in their home country. Some were created in the 80s and early 90s when the structural adjustment programmes imposed by the World Bank and the International Monetary Fund led to mass lay-offs in administrations. Others were created by activists. These different NGOs have gradually become essential structures for the implementation of development operations. Yet others are faith-based organisations. For example, Caritas has a national structure which brings together the different Caritas members at the diocesan level. National organisations may be attached to an international network (the Red Cross, Caritas, etc.) or may be a branch of an international organisation like Care or Oxfam via a system similar to a franchise.

It is interesting to note how similar the history of many of these local and national initiatives is to that of international organisations when they were first set up: a few visionary and committed people, few resources, small-scale initial funding then gradual growth based on merit or success which establishes trust and allows budgets, teams and programmes to grow. This is illustrated by the testimony at the WHS

of Julienne Lusenge, founder of Sofepadi who was consulted on this research in Bunia, DRC.

Testimony of Mme Julienne Lusenge, founder of Sofepadi, Bunia, DRC

"Our organisation was created in 2000 when there was an inter-ethnic conflict in Ituri. While providing assistance to the displaced, we identified victims of sexual violence amongst the displaced women and we began to provide holistic care to the survivors including the judicial aspect. (...) Resources need to be made available to women's groups who provide women with legal assistance. Humanitarian organisations should make justice for women a priority at the same time as they conduct humanitarian operations because when there is no support from donors, we contribute ourselves or we use our salaries to pay the fees (...). Humanitarian action needs to remain human, and not a job; humanitarian action should exist to help human beings. We hope that by the end of this summit, we will have restored the image of Humanitarian action".

During conversations, those involved in such 'young' national organisations often express pride in what has been achieved, acknowledging those who believed in the initiative, before going on to a mixed analysis of the current reality, and notably the relations of inequality and dependence that exist between national and international actors. Another partner said, *"International NGOs began with very few resources. They must not forget that. They need to support us so that we can grow and get stronger"*.

It should be noted that in the South, as in the North, the structure of civil society and the national NGO sector is becoming more concentrated, with the appearance of monopolies and oligopolies with regard to access to resources. Thus, large national bodies are being created which concentrate a large portion of the resources made available by the donors and there is heightened competition between local organisations. This phenomenon of concentration is not without risks, in particular when civil society actors are criticised leading to large local and national NGOs being easily identified and put under pressure by different types of stakeholders using different means (ranging from administrative constraints to physical threats).

Lastly, there is the emergence of **international NGOs "from the South"**. These NGOs, which were initially national and created in a country where there were humanitarian or development operations, began to carry out operations beyond the borders of their country of origin: this is the case for BRAC in Bangladesh, which is now present in 15 countries, and which employs 120 000 people worldwide, or Mercy Malaysia, which was working in ten countries in 2015, and also smaller organisations like ALDI, an NGO from Congo, which now conducts operations in CAR. This makes the localisation agenda more complex but corresponds to the paradigm shifts and power relations mentioned above.

The definition of local actors in relation to localisation and particularly those who will be eligible for the 25% of funding to be provided "as directly as possible" is still the subject of discussion at the international level⁸. Perhaps, the most controversial use of the title "local" is when it is used for franchised organisations (such as Care or World Vision southern-based national organisations) and the international organisations based in the South often originating from the development of a national NGO.

2.2.3 Other civil society organisations

There are many other types of civil society structures, such as trade unions, professional associations, parents' associations, political parties, religious organisations, etc. The private sector plays an essential role in the initial response in numerous contexts, particularly in emerging economies, by providing basic goods or by taking part in humanitarian responses (logistics, communication, etc.). Lastly, discussions about localisation rarely take into consideration the role of organisations involved in the knowledge sector (universities, research centres, and consultants). These other types of civil society organisations could be included more in order to establish more local humanitarian action and reflection.

⁸ See Development Initiative on-going work for the IASC Humanitarian Financing Task Team.

3. The current position of local actors in the humanitarian system

The role of local and national actors in humanitarian response and aid architecture is obviously different depending on the type of organisation, and whether it represents the authorities (3.1) or is a private organisation (3.2).

3.1 The marginal and sometimes difficult position of local and national authorities

Regarding state actors, even though their role has been recognised in international texts for a long time (Geneva Conventions, Resolutions of the United Nations General Assembly), it is only relatively recently that their role in humanitarian operations, and notably in coordination, has been taken into account.

Following the first years of implementation of the cluster approach (2005 – 2010), several evaluations, such as the evaluation of the response to the Haiti earthquake, underlined the importance of including national actors more in international coordination mechanisms, and even questioned the act of establishing international coordination mechanisms in parallel to national mechanisms. Since then, the clusters, inter-agency coordination bodies and humanitarian country teams (HCT) have included local actors and authorities whenever this has been relevant and possible. This issue is directly addressed in **Commitment 3 of the Grand Bargain: Support and complement national coordination mechanisms where they exist and include local and national responders in international coordination mechanisms as appropriate and in keeping with humanitarian principles.**

However, with regard to these specific case studies, the role of the local authorities in humanitarian affairs appeared to be marginal or, in some contexts, a source of difficulty. Their representatives take part in

coordination mechanisms without playing a significant role; they are invited to take part and are able to play a technical role but do not appear to be fully part of the system. Those with close ties with the population are able to pass on information about needs but they rarely have the possibility of taking action.

In DRC, the structural weakness of the administration, which is the cause of many humanitarian situations (conflicts over land, the deterioration of health conditions, insecurity, etc.) is a real constraint. In certain areas, there simply are no state representatives, or no means to allow civil servants to go to the affected areas. The national authorities in DRC have been invited to join two national clusters (Wash and Protection) which, especially for protection, has proven to be very sensitive. The government and its local representatives are both the target of advocacy and partners in the implementation of aid. This dual position is not always easy to deal with and relations with international organisations can be tense or even a source of conflict. This is exacerbated by a context where access to resources is difficult and international aid is an important economic sector which is not fully controlled by the authorities.

In the case of Myanmar, humanitarian issues tend to be minimised in political discourse. This tendency to ignore persistent humanitarian challenges in a period of political transition is reminiscent of similar cases such as Colombia and CAR. It occupies a marginal place in international relations where stabilisation and development are the dominant themes. And yet questions of access (both during previous natural disasters and in relation to the ongoing conflicts in the country) are totally dependent of the decisions and will of the authorities.

In general, the way the meetings of national actors are run does not always correspond to the expectations of international organisations. For example, International

actors reported in Myanmar and DRC that some meetings with local authorities were long, with long interludes in the national language that were not translated, agendas that were not always very precise and sometimes superficial note-taking. In the end, this leads to disengagement on the part of the international organisations from these local coordination mechanisms, which is very damaging both to coordination itself, and the quality of the relations between international agencies and public authority representatives. International actors often overlook local coordination mechanisms that indeed exist. These are run by the national authorities but they are more oriented towards development and exist in parallel to the clusters. It is interesting to note that many national actors allay the exact same criticism at international actors regarding language, relevance of agenda, abstract debates, and so on.

Thus, even though all actors know that ultimately, the local authorities will have to take over responsibility and coordination for relief and protection activities, coherent strategies for handing over to the authorities are nascent in numerous contexts, and humanitarian coordination for the most part remains centred around international actors.

The type of situation (conflict or natural disaster) obviously has an impact on the type of relations that can and should be established with the political authorities. There is more experience of supporting the role of governments with regard to capacity building for disaster preparedness.

3.2 The growing role of local organisations in aid operations

Local and national civil society organisations are increasingly recognised as first responders and involved in operations even though funding is limited (3.2.1) and their role in coordination is marginal (3.2.2).

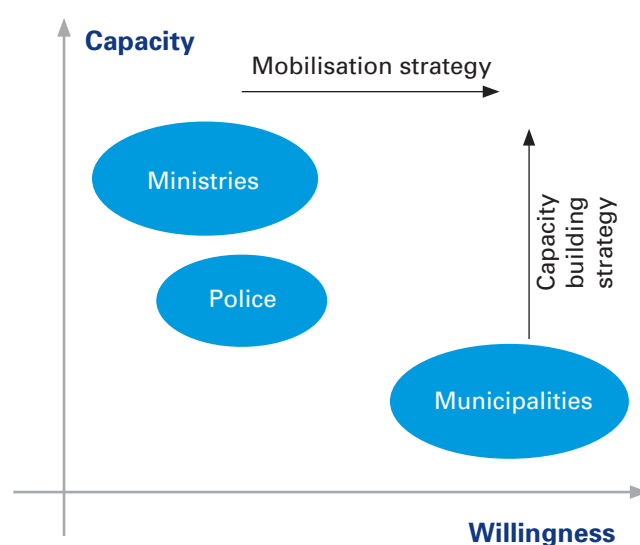
3.2.1 A significant contribution to operations but limited access to direct funding

In the two case studies selected for this study, local NGOs are heavily engaged at the operational level. In Myanmar, local actors have access to the population in the northern regions (mainly Kachin

and Shan) as opposed to international organisations who do not, due to governmental restrictions. Local NGOs therefore have the main operational role in the humanitarian response. In eastern DRC, there is a wide variety of local NGOs involved in different areas and notably in humanitarian action.

As described in Figure 2, each situation has to be analysed independently in order to design a relevant strategy with regards to local authorities. Partnerships for humanitarian aid will depend mainly on the capacity and will of the administration but also its proximity and legitimacy. The different levels of administration should therefore be analysed (central, provincial or territorial) because though collaboration with the central level often seems problematic, at the local (territorial) level it is generally necessary and potentially needs to be reinforced. They are at various stages of development even though the majority of them are relatively young, having been created in the upheaval of the last 20 years in eastern DRC, and they work in partnership with different international organisations, whether UN agencies or NGOs. The UN agencies in Bunia recognize that they are aiming to establish more partnerships with local NGOs because “humanitarian aid budgets are falling” and numerous activities “are not complicated”.

Figure 2: Example of Capacity-Will analysis



At the same time, there is a major imbalance at the global level in terms of funding. According to the Global Humanitarian Assistance report 2016, local and national NGOs combined received 2.3%⁹ of direct funding in 2015, even though it is not possible to tell how much they received indirectly as sub-grants. This underlines the importance of the last three commitments of Workstream 2: National and Local Responders (Localisation) of the Grand Bargain:

- ***Achieve by 2020 a global, aggregated target of at least 25 per cent of humanitarian funding to local and national responders as directly as possible,***
- ***Develop and apply a 'localisation' marker to measure direct and indirect funding to local and national responders***
- ***Make greater use of pooled funding tools (CBPF, DREF and NGO-led and other pooled funds).***

In Myanmar, access to *direct* funding is a central demand of the main national organisations. However, at this stage, there are not many funding windows open to them. The main humanitarian donors are still reluctant to fund national and local organisations directly. The donors' procedures and stringent accountability measures mean that they generally prefer to finance international agencies (UN and NGOs). If these institutions then decide to work with local NGOs, it is they who then have to ensure financial responsibility as grantees. According to the Myanmar Humanitarian Fund, (2016 Overview, OCHA), 45% of the funds go to national NGOs compared to 43% to INGOs and 12% to United Nations agencies. But this 45% includes the funds received directly and the funds received as implementing partners of international organisations.



Over the last years, we always had to go through intermediaries and we didn't have direct access to institutional funding. For the first time this year we got some funding through the ERF, but it is very complicated in terms of procedures and paper work. It takes a lot of time and it is not very reactive.

Partner of Trócaire's in Myanmar

Initiatives have been introduced by donors, such as DFID's HARP initiative in Myanmar, which is currently being launched with large-scale funding. It aims to strengthen resilience through a dual humanitarian and development approach. The initiative is being implemented by Crown Agents who are responsible for administering the initiative, allocating resources and supporting capacity, strengthening efforts directed at Myanmar civil society.

In contrast to humanitarian donors, some development donors in Myanmar work with national and local NGOs in a more systematic manner. USAID has made it a development priority and explained to the study team that they want to invest massively in the civil society sector. However, they have only succeeded in providing one US grant for a local NGO at this stage, as processes are complex and require a high level of legal and organisational expertise.

In DRC, the Pooled Fund already provides local NGOs with 22% of its budget, which represents a significant change in 2016 because between 2006 and 2015 only 10% was allocated to them directly. This is an old Pooled Fund (more than 10 years old) which has established and refined its allocation processes and its monitoring processes over a number of years (evaluation of the eligibility of national and international partners and budgetary allocations). Supporting local actors has also been an objective for some time. No comparative data is currently available from the Myanmar Humanitarian Fund.

Nevertheless, local NGOs complain that they do not have access to other sources of direct funding. Donors appear to prefer giving the responsibility of managing the funds to a third party (Country-based pooled funds, institutions such as Crown Agents or international NGOs) rather than funding local NGOs directly, except in exceptional cases (SOFEPADI receives funds directly from the Norwegian Embassy in DRC and other European foundations). In this context, the funding mechanisms of Caritas Internationalis and the Red Cross allow this constraint to be overcome by making funds from emergency appeals available for local branches.

⁹ <http://devinit.org/post/global-humanitarian-assistance-report-2016/>

3.2.2 Strategic positioning of local actors in humanitarian coordination

The involvement of local organisations in coordination mechanisms remains marginal for the most part and most often seats within the HCT have been gained by means of active, and persistent advocacy.

The structure of the humanitarian sector in Myanmar has evolved due to vigorous lobbying and four national NGOs became standing members of the HCT recently. These four agencies who joined the HCT were nominated by the international aid organisations rather than designated by their peers, as coordination among national NGOs is still in its infancy and difficulties remain in terms of achieving unity and establishing democratic nomination procedures. According to an interviewee in Myanmar, *“getting accepted in the HCT required a lot of advocacy. INGOs were very reluctant as they did not trust the local actors and accused them of leaking things to the government”*. According to another partner, *“Local actors are often excluded from critical strategic discussions (such as on resettlement)”*.

However, the cluster coordination system is not seen as integrated by national and local NGOs who tend to respond to needs in a holistic manner and do not have the manpower to take part in all the clusters and working groups set up by OCHA. In addition, one of the key components of coordination for them is the fact that they work with state technical departments and municipal institutions, whereas international coordination mechanisms tend to overlook these. Though this is justified in certain contexts in terms of independence and neutrality, this is not the case in many others.



According to an interviewee in Myanmar, “getting accepted in the HCT required a lot of advocacy. INGOs were very reluctant as they did not trust the local actors and accused them of leaking things to the government”. According to another partner, “Local actors are often excluded from critical strategic discussions (such as on resettlement)”.

In eastern DRC, in Ituri and South Kivu, 2 local NGOs are members of the local Inter-Agency Standing Committee (IASC). Local NGOs are co-facilitators of certain clusters. Local NGOs in Ituri do not yet appear to be organized in a coordination network, whereas the process has begun in the Kivus with local NGO consultations and the creation of a network of Human Rights NGOs by MONUSCO. This platform in Kivu together with the INGO forum asked Caritas DRC to represent national NGOs at the HCT in Kinshasa and this has now been accepted.

Humanitarian coordination mechanisms are often very complex and resource-heavy, and national and local actors often find it difficult to find their place within them. Meetings held in a foreign language, information generally transferred by internet, means of transport often unavailable and time constraints, make it difficult for them to take part. In some countries, local and national NGOs use specific communication tools (e.g. WhatsApp) which international organisations do not often use. In other contexts, they may not have access to the internet and therefore need to be invited to coordination meetings by telephone or letter.

According to one of Trócaire’s partners in Myanmar: *“Some years ago, when internet was of bad quality and very expensive, local actors were not much connected to the rest of the system. We were excluded “by default”. Luckily, internet quality improved and costs went down, making it easier for local NGOs to take part in global coordination.”*

3.3 The comparative advantages and positioning of local NGOs and international NGOs

Below we outline the different types of relations between international and national organisations (3.3.1) before going on to analyse the comparative advantages of local actors (3.3.2).

3.3.1 Different approaches to partnerships and localisation

Based on our observations and exchanges with local and international actors, we have identified different approaches to partnerships and ways of considering the role of local actors in humanitarian response. Many

different nuances may exist between these approaches. Indeed, it would be possible to establish a “localisation scale” similar to Pretty’s “participation typology”¹⁰. However, from the point of view of the local actors we interviewed, there were three main approaches:

The sub-contracting approach. Certain partnerships are oriented towards achieving objectives established by the international organisation, and which have often been agreed with their donors. This approach is often adopted by organisations whose main objective is humanitarian and operational. The decision to work with local partners to implement programmes is sometimes made by default due to access constraints, or because of the lower costs. The local partner benefits from capacity building either via specific activities, or by learning “on the job”. On the other hand, there is no long-term commitment and it can be seen as a form of sub-contracting. This is the method that is used most by United Nations agencies who instigate annual calls for proposals for their partnerships. This can lead to frustration on the part of local actors:

**“Stop calling us
“implementing partners”,
just call us partners.”**

Trócaire also sometimes uses this approach which ties its partners to implementing its strategic plan and the projects it has already negotiated with its donors although objectives are mutually agreed through a collaborative process.

Supporting the locally led response. Some international actors consider their role to be to support local initiatives. The local organisation has the vision and strategic analysis, and the international actor decides to support these. This approach is adopted by NGOs who aim to support civil society and are committed in the long term, that is to say development or multi-mandate NGOs. It is quite rare for NGOs who only engage in humanitarian action (as opposed to those with a dual humanitarian/development mandate), who have a culture of quick impact and short-term engagement, to use this approach. However, exceptions exist which illustrate the fact that

context matters and that the determination and strength of local actors might be more important than the institutional culture: the partnership in eastern DRC between MSF and SOFEPADI, where 3 years of collaboration have allowed the medical care centre for victims of SGBV in Bunia to continue, shows that even humanitarian actors that are specialized in emergency relief sometimes need this approach to make their actions sustainable.

Supporting a locally-led humanitarian response in Ituri, DRC

Since July 2016, humanitarian needs in the Ituri province, Democratic Republic of Congo (DRC) have been compounded by the arrival of over 66,672 refugees who have fled fighting in the Equatoria region of South Sudan. Refugees have been arriving on a daily basis and are assisted at the border at Biringi, Ituri province, and at other sites in the province of Haut-Uele. The current scale of the crises in the DRC and South Sudan has exceeded forecasts. UNHCR had estimated that they would deal with around 20,000 refugees by the end of 2016 but in fact have registered 40,754 in total to date.

After the arrival of South Sudanese refugees in Aru, Caritas Mahagi (a member of the national Caritas Network and a partner of Trócaire’s since 2006) carried out an initial scoping mission of the situation on the ground. Subsequently, Caritas Mahagi arranged a joint needs assessment with Trócaire to provide assistance in Biringi site (February 2017). At the same time, UNHCR appealed to Caritas Mahagi and Trócaire to assist in addressing key gaps in assistance caused by funding shortfalls. Caritas Mahagi responded by providing seeds and tools to 1200 households over a period of 4 months with financial assistance of €150,000 from Trócaire. The distribution was carried out by Caritas Mahagi in coordination with other stakeholders in the camp. A food package was also distributed to mitigate negative coping mechanisms such as eating seeds or selling tools.

Trócaire contributed in-kind support to Caritas Mahagi to strengthen the quality of the response. Financial support was provided to Caritas Mahagi to manage the grant as well as respect standards and procedures. Trócaire supported Caritas Mahagi to work effectively with other actors working on the response and UN agencies including WFP and UNHCR who managed the camp. This approach has been recognised as an appropriate way to support local actors as first responders in a response.

Direct operators. Certain international humanitarian actors in eastern DRC conduct operations directly with communities and only rarely interact with local NGOs, usually to gain information about needs, but without including the local organisation that provides the information in the response. Some international actors have not taken their strategic reflection about localisation very far, as is clear from the views of a head of an international NGO in DRC who felt that localisation was secondary as his organisation employed mostly national staff. This is obviously a source of frustration for local NGOs and leads to resentment, thus calling into question the viability of such an approach in the medium and long term and in a protracted conflict where needs are relatively static but development options are limited. As an illustration, an interviewee in DRC told us that a decree is currently being drafted in the Kivus by the Authorities to oblige all international NGOs to work in partnership with a national NGO. Only very clear added value in terms of expertise or operational capacity will justify such a new administrative procedure in relation to local organisations who are increasingly well trained, informed and active.

In Myanmar, for some international organisations, direct access to affected people is an essential part of their operating procedures, as they express solidarity through person to person relations and protect communities through their presence. Organisations of this kind are no longer able to work in the Northern states of Myanmar and are only present where they can have direct access to

the affected population. These agencies claim that their mandate is purely humanitarian and focused on life-saving activities and they state that their mandate does not include helping to develop civil society organisations.

Trócaire sees itself as belonging to the second category 'Supporting the locally led response', as is probably the case for other comparable international organisations who work in partnership with local organisations. Indeed, it does belong to the second category when it supports Caritas' locally-led appeals and with international surge assistance/secondment (see box above) and it did also in the past when it provided grants to partners without any presence in the field. The way it works with its partners today is not always in keeping with this approach for various reasons. Quite recently, since 2012, Trócaire established offices in countries where it works to guarantee the quality of its actions. One of the main barriers to supporting locally-led responses is in situations where objectives are already designed and validated with the donor before the scope of the work is agreed with the partner. As a result, this creates a sub-contracting relationship even though Trócaire does help to build the capacities of its partners through the implementation of projects.

3.3.2 Analysis of the comparative advantages of local NGOs in humanitarian response

According to the interviewees met in DRC and Myanmar, the comparative advantages of national and local NGOs are as follows:

- **Lower cost** (often mentioned first by international actors) which allows greater efficiency in a context of reduced budgets.
- **Access and agility** (physical access or access to information) in difficult or unsafe regions which allows better geographical coverage. Both in DRC and Myanmar, large geographical areas are simply not accessible to international staff of humanitarian organisations.
- **Local ties and knowledge of the context** lead to greater acceptance and ownership of programmes by communities. In the words of a partner in DRC, "the humanitarians think

everyone is vulnerable because they don't know the communities. They need to work with us for targeting, otherwise the aid is not used effectively".

- **Long-term presence**, which allows sustainable operations and exit strategies for international actors.

Some weaknesses were pointed out, both by the local NGOs themselves, and by the international organisations that were met:

- **Management capacity:** management capacity is crucial in order to receive funding and is therefore generally the capacity that is reinforced first (often repeatedly by various INGO partners), even though many organisations still do not have sophisticated management software and processes. Though it is widely recognised that each project needs to be monitored and the related expenditure clearly presented to the donor/partner, it is difficult (particularly in DRC) to gain access to organisations' consolidated accounts. This can lead to a certain number of difficulties in terms of financial transparency and does not help to build trust.
- **Financial resources:** in DRC and in Myanmar, financial resources are often limited as is the ability to mobilise complementary funds (such as fund-matching / overheads / ancillaries / activities not funded by donors but key to programming – unrestricted funding). This is a genuine constraint as it is one of the selection criteria for certain projects/funds.
- **Governance problems:** in DRC, the principle of voluntary work on which associations depend is a genuine challenge because it is a context where many have to spend their time ensuring that they have enough to eat from one day to the next. Giving time on a voluntary basis, or travelling to a general assembly, is not always easy and often requires compensation.



It is not like in Europe here. We don't have social security... you need to work to survive from day to day. How can representatives of international NGOs, who are well paid, demand that we work for free?

Trócaire partners in DRC

However, each organisation should be considered individually and generalisations should be avoided. Local NGOs recognize that some of them have problems, but they point out that it is the case among international NGOs as well, and that each organisation should be considered individually.

The tools and processes developed by the DRC Humanitarian Fund seem appropriate and sometimes rate local organisations higher than international ones. Similarly, Trócaire's field staff and partners appreciate the organisation's methodology for assessing capacity to manage a grant (18 minimum requirements)). The harmonization of these tools and the sharing of results could be useful in the long term if various international actors need the same information. This would mean that local actors were not repeatedly assessed. This common methodology could be based on the Core Humanitarian Standards (CHS) and other existing frameworks to ensure that there was coherence between the various humanitarian actors and donors. This would be in line with the Grand Bargain workflow "Reduce duplication and management costs with periodic functional reviews" whereby organisations were committed to "harmonise partnership agreements and share partner assessment information, in order to save time and avoid duplication in operations" and donors were committed to "make joint regular functional monitoring and performance reviews and reduce individual donor assessments, evaluations, verifications, risk management and oversight processes."

4. Localisation: Issues at stake

The study identified six issues at stake linked to localisation: heightened tension between international and national actors (1) Critical analysis of the humanitarian sector by local and national actors (2) The question of humanitarian principles (3) Security management and risk transfer (4) Direct funding and (5) Accountability and (6) LRRD.

4.1 Heightened tension between international and national actors

Local and national NGOs have mixed opinions about their relations with international actors. These depend both on the international actor's behaviour and approach (their practices and their view of partnerships), and on the national actor's maturity and its independence both financially and in terms of its positioning. Local and national NGOs recognize all the positive input and constructive interaction that has allowed them to develop. However, numerous areas of tension were reported during both field visits:

- **Access to and competition for funding:** Local NGOs' access to international funding remains difficult. Few donors have budget lines specifically for local NGOs. The increasingly frequent use of competitive tendering, which, in some respects, could be favourable to local NGOs (in terms of costs), is unfair in a number of ways. Certain local NGOs feel that competing with international NGOs for some proposals is unfair when co-funding is required. It is difficult, if not impossible, for these NGOs to raise the proportion of funds that is required. This view is confirmed by certain UN agencies who are trying to establish more direct partnerships with local NGOs but struggle to find partners who meet their criteria, notably regarding their ability to mobilise complementary funds. Other interviewees pointed to two other factors that they consider to be unfair: the fact that international NGOs try to receive funding at the local level when they have other opportunities at the international level; and "the fact that INGOs are much older makes it unfair that we have to compete with them".

- **The question of overhead costs:** For local and national NGOs, institutional development depends on having access to dedicated support funds, and when the latter do not exist, to administration or overhead costs. When asked what needed to be changed to improve localisation, a partner of Trócaire's in Myanmar answered that they want to receive funds directly in a way that would support their own institutional development.



We want to get more direct funding, where administrative costs are included.

Trócaire partner in Myanmar

Institutional support from donors and non-earmarked funding is exceptional and highly appreciated. The fact that local and national NGOs have to go through international NGOs, who in general keep a large part of the overheads, creates resentment. Some local NGOs have begun to question the value of uncoordinated and repetitive capacity building.



We have been trained enough, we do not need any more capacity building – now we want to deal directly with the donors, and thus keep the overheads for their own needs.

LNGO DRC

- **Respect and equal treatment:** Some representatives describe problems of behaviour on the part of certain expatriate staff (lack of respect, suspicion, etc.) in their relations with local staff. Local actors sometimes feel exploited when they are approached for information at needs assessment stage and then ignored during the response. The differences in salaries between local and international staff is regularly mentioned. The differences in salary between national staff of international NGOs, the staff of local NGOs and the staff of local and national administrations are enormous and unjustified. Such stark differences create problems on the local labour

market such as high competition to employ experienced staff, and of headhunting or poaching of qualified staff, reducing the efficacy of local actors. Local organisations also have difficulty investing in logistics and support systems in general, such as vehicles. This creates a difference of status with international NGOs which is sometimes felt to be unjust.

- **Access to Information.** Local NGOs, including the ones that are the most developed, describe the difficulty they have in gaining access to information. Access to internet is difficult in many regions and requires significant investment of resources and logistics, which many local actors do not have.
- **The complexity and cumbersome nature of reporting mechanisms:** Above a certain size and number of projects to manage, local NGOs complain about the complexity and the quantity of the reports that need to be produced, with different calendars and formats depending on the donor/partner. In Myanmar, according to field staff, *"each partner has to provide a report on each programme, following the specific report format. In some cases, Trócaire tries to reconcile things at a higher level. This is all extremely time-consuming for partners and for Trócaire"*.¹¹

Certain international NGOs are known for supporting their national partners effectively, such as OXFAM and Trócaire. It is a strategic objective of some of the local NGOs we met to become partners of these organisations. For other actors, international NGOs are seen as competitors. In the words of an interviewee in Myanmar *"By removing the intermediary layer (meaning UN and INGOs), more money will go to the population"* and *"there have been INGOs for a long time, but it is critical that they make themselves obsolete"*.

The issue of localisation opens the door to other essential issues related to the political economy of aid and North/South relations. If it is handled badly, it can potentially create or increase tensions between local and international actors.

4.2 Critical analysis of the humanitarian system by local actors

The aid system has become standardised and more complex over the years. International organisations currently use a number of standards (Sphere and the CHS), guidelines and processes (cluster mechanisms, response cycles and HRP, etc.) in order to respond to different humanitarian situations in a responsible, predictable and coherent manner.

In terms of localisation and reinforcing the capacities of local partners, it could be very tempting to impose the same norms, standards and procedures on national and local actors, which would potentially lead to a loss of diversity among actors. If one of the challenges of localisation is to do things differently, notably to ensure that operations to build the resilience of populations and societies are sustainable, do we not need to think outside the box and ensure that operations are adapted to contexts?

The risk of imposing a flawed blueprint model of humanitarian response on local actors is significant.

According to one of Trócaire's partners in Myanmar: *The local response to a big disaster is often fast and adapted during the first 24 -48 hours. While INGOs and UN agencies still continue to discuss and have logistical difficulties to move in, local NGOs know how to move fast, and come with some resources and start the operations before they have all the information. Why ask for a log frame and work plan when there is no information and when time is a crucial resource? Flexibility is the key.*

During the response to the floods in Myanmar in 2015, international organisations struggled to get to the affected areas to assess needs and carry out initial evaluations as the road was blocked by lines of trucks, belonging to local (private) actors that were taking food to the affected population. For these private actors and local NGOs, the nature of the initial needs was obvious and it was not necessary to carry out complex inter-agency assessments.

¹¹ Myanmar has been identified as a pilot country for Aid Harmonisation: Grand Bargain WS 4. Reduce duplication and management costs with periodic functional reviews

For the humanitarian system, the goal in such a context should not be to try to influence the local response mechanism but rather to adapt to it and provide rapid support.

According to another partner in Myanmar: *the required flexibility in times of turbulence is not always there with western donors. Donors often don't understand the changes in the field and keep a rigid approach "result-based management" in turbulent, complex, diversified and fast-changing conditions.* Yet another one argued that, *"the UN is still a difficult partner to engage with in terms of shared decisions. The UN still comes with blueprints from other countries and makes little effort to adapt it to the context"*.

In contrast, certain interviewees in DRC expressed concern about local NGOs reproducing standardized mechanisms for the distribution of humanitarian aid (distribution of NFI, food aid and temporary shelters) rather than thinking about more long-term approaches to agricultural recovery or support for the construction of more long-term shelters for displaced people.

The technical silo approach to assistance, which is sometimes made worse by the cluster coordination mechanism, is also regularly criticized in Myanmar where local actors feel that the humanitarian response should be integrated.

Making the aid system's standardization tools coherent with the many different contexts and perspectives that exist is not easy. This needs to be approached in a strategic and transparent manner in order to avoid transforming national and local actors into "clones" of international actors, or, in the words of a UN representative in Myanmar, to avoid *"the syndrome of the Chameleon: looking like us, doing things like us"*, which would remove the value of their being "local".

4.3 Aid localisation and humanitarian principles

Many international stakeholders express concern about whether humanitarian principles, particularly impartiality and neutrality, will be respected by local organisations. Indeed, local organisations (Community Based Organisations and Civil Society Organisations) are rooted in their historical, cultural and religious constituencies and have to report back to them in

formal and informal ways. In northern Myanmar, IDP camps are frequently populated by people from one church group, as they move to the closest institution that shares their faith.¹² In DRC, even though there are no clearly identified frontlines or divisions based on religious, political or ethnic affiliation, there is tension in relation to partnerships with local NGOs. One of the main strengths of local agencies is their links with local communities and the local authorities. These close links are also perceived as a weakness by international actors: who perceive a real risk of nepotism, with local NGOs who give priority to their own networks for jobs, suppliers, beneficiaries, etc. All agencies that work in partnership with local NGOs need to pay particular attention to this point.

On the other hand, in Myanmar, some national organisations express concern about the level of neutrality of international actors, such as UN agencies, as they feel that their links with the government are too close and they feel that the international community is too complacent. Some national organisations also raised the question of which humanitarian principles should be respected most: are neutrality and impartiality more important than humanity? In DRC, MONUSCO¹³ is not perceived as completely neutral and the alliance with United Nations agencies as the potential to compromise the principles of independence and neutrality. If the political situation were to deteriorate, the positioning of these security forces could change, which could consequently affect the local and international partners of UN agencies. The fact that one agency is perceived as too close to the MONUSCO could become a factor of security risk should the context change where MONUSCO becomes a party to the conflict.

Finally, how neutrality and impartiality are understood may have to be questioned in the context of the localisation agenda: are they principles that have to be applied at all levels, including the local level, or do they only have to be applied at higher levels (e.g. crisis or country level)? In other words, does the cumulative action of various partial CBOs and CSOs achieve a certain level of impartiality and neutrality?

¹² See « Faith-based humanitarianism in northern Myanmar », Edward Benson and Carine Jaquet in Faith and responses to displacement, Nov. 2014

¹³ The United Nations Organisation Stabilisation Mission in the Democratic Republic of the Congo

In DRC and in Myanmar, certain international actors work with local actors who, taken individually, are not neutral or impartial. They consider neutrality and impartiality at a higher level (province/region/state). It is aid as a whole that needs to be neutral and impartial and not each individual project or partner.

4.4 Security management and risk transfer

In “The Effects of Insecurity on Humanitarian Coverage” (Stoddard & al, 2016), it is argued that “National NGOs are always amongst those most present in dangerous areas, together with the ICRC and a few international NGOs”. One of the clear advantages to international actors of working through local actors in highly insecure contexts that are inaccessible to international organisations is the fact that they are subject to fewer security constraints, or, in other words, they take greater risks. In Myanmar, only local actors are authorised to work in the regions in the north of the country. As a result, most of the humanitarian assistance to the communities in these regions goes through local organisations.

The localisation of aid therefore often leads to the transfer of risk from international to national actors. This is one of the essential reasons for the localisation process globally, but it is rarely expressed explicitly.

Yet, local actors often have fewer logistical means than their international partners (vehicles, means of communication, physical protection) and are less well prepared in terms of security procedures and training. This subject is rarely considered to be a priority in terms of capacity building. Yet, the operating environment in many situations remains extremely dangerous.

“There were 13 times as many national staff victims as international (expatriate) victims in the five most dangerous countries (Afghanistan, Somalia, South Sudan, Syria and Yemen), and seven times as many globally. International staff had higher rates of attack, due to their smaller number in the field.

Aid Worker Security Report 2016

Strategies to mitigate these risks are still in their infancy. Local actors often do not have the same protection or support from their government or insurance mechanisms if a security incident takes place (injury, death, long-term disability, etc.). In many cases, medical evacuations abroad are only carried out for international actors, or in some circumstances for national managers of large national institutions: at best, the staff of local NGOs receive medical care from their local health services even though this may depend on their insurance coverage (often non-existent) or their families’ resources. Though many international NGOs have put procedures in place to provide families with support when international or national staff die in the field, formal procedures in such circumstances are rare among national and local NGOs. This difference in treatment, notably during evacuations, is often experienced as an injustice and raises important ethical questions.

“When there are security problems in the field, international staff are evacuated. We stay behind. What is more, we don’t have the means to protect ourselves properly or to manage difficulties if there is a problem. It isn’t fair.

Trócaire partner in DRC

4.5 Direct funding and accountability

Implementing proper administrative, financial and human resources management as well as financial and operational upwards and downwards accountability is already a challenge for well-established international NGOs. It is even more complicated for national and local NGOs, as financial competency, staff retention, institutional memory and the ability to access the appropriate hardware and software are often a significant constraint.

Another constraint for donors (and consequently for the response) is the size of the projects local NGOs can implement, which requires a multiplicity of small contracts to be managed by overstretched donor staff. Many donors work through Country Based Pooled Funds or international actors as they are reluctant to fund local organisations directly. The lack of clarity

about what is meant exactly by “local responders” and “as directly as possible” is a source of tension and has led to disputes with certain organisations.

It is important that donors clarify the level of risk they are prepared to take responsibility for when working directly or indirectly with national and local institutions. In the post WHS and Grand Bargain era, it is not acceptable that the weight of donor-imposed management and accountability challenges should be borne only by international NGOs.

Proactive assessment of local capacities requires that systems and methods are in place to do this. Some international NGOs have invested heavily in such systems and use them both to assess capacities and develop support and training strategies. Donors need to consider how practically and effectively to support the assessment of local organisations and establish a pre-vetting mechanism (like ECHO’s Framework Partnership Agreement) to allow fast-track funding to pre-identified and pre-selected stakeholders. Competition and the risk of creating local elitism among local NGO cannot be discounted.

Donors need to realise that working with national and local NGOs is not a risk-free endeavour. Local NGOs also need to develop their own institutional budget. Donors should accept that support costs to national and local NGOs can be seen as a direct eligible cost.

4.6 Localisation and LRRD

Localisation of aid and LRRD are intrinsically linked. In general, local actors who deliver humanitarian assistance were already active before the crisis, and they rarely stay focused on humanitarian aid. They often have both humanitarian and development partnerships and projects with different timeframes and different types of funding.

However, the economic models involved are radically different and the amounts generated during emergency relief responses are not comparable to the smaller budgets of development programmes. Local and national NGOs should aim to avoid being dependent on external and institutional funding and think about other types of internal revenue. This is often difficult for international NGOs, but it is even more difficult for local actors who are immersed in

contexts with low resources and where “generous private donors” are rare.

In DRC, some of these organisations were previously suppliers for international organisations (for example, carpentry work for IDP shelters produced in reinsertion workshops for demobilized young men), before implementing projects themselves. This dual economic model where organisations generate revenue to give themselves greater autonomy in addition to project-related funding is not always seen in a positive light: some feel that not-for-profit organisations should not take part in commercial activities. However, this income generating model could be a viable model for the future for certain organisations.

If localisation implies that more resources should be directly transferred to local NGOs, how can a “humanitarian bubble” be avoided which would risk making these organisations dependent on external aid and vulnerable to the often brutal reduction in humanitarian funding (cliff effect)?



Most of the local actors are still very young. Only a few have the capacity to move fast. They are surviving from one project to another with few “longer term” perspectives. As long as there is no core funding for local NGOs, they will remain dependent on their international partners. In contexts like here, local partners are always overloaded by work and have very little time to properly explore their future.

Trócaire staff, Myanmar

In addition, only a few national actors in Myanmar have access to the affected population and can deliver humanitarian aid on a significant scale. As a result, international agencies are very keen to work with them, with the risk that they are pushed to grow too fast. This could lead to power and resources being concentrated among a small number of NGOs and therefore a loss of diversity among CSOs.

In addition, injecting more money into local NGOs when public services are underfunded and civil servants are underpaid runs the risk of creating tension between these local actors. Interviewees expressed concern about local NGOs becoming more influential than local government. If budgets grew there would be a risk of unintentionally damaging local civil society.

Alongside localisation, development organisations therefore also need to make a more significant commitment to consolidating the rule of law, supporting the administration and public services, etc. This will help to ensure that the state fulfils its responsibilities and that the humanitarian sector is able to empower local civil society and complement it when necessary.

5. Conclusions and recommendations for Trócaire

5.1 Conclusions

The World Humanitarian Summit and initiatives related to localisation, such as *Charter4change*, *Shifting the Power* and the exchanges in connection with this study, are having a significant influence in raising awareness among local and national actors about their role in humanitarian response. They are becoming direct, front line players in the process. In the words of a local partner that we met, “a major change is taking place”.

The issue of localisation is gaining ground and is changing narratives and positions not only at the international level, but also at the local level. After years of incoherence between the official line on local partnerships and what actually happened on the ground, one of the observations of this study is that there is a lively debate about the role of local actors in humanitarian response at the local level, both in Eastern DRC and in Myanmar.

The internal forces reinforcing local and national organisations should not be under-estimated. As observed during the field visits and the many exchanges that took place, these organisations are getting stronger and are becoming more and more organized, informed, engaged and demanding. Yet, the majority of discussions about meeting the commitments of the Grand Bargain are currently taking place at the international level without the involvement of local actors and are primarily focused on the issue of funding. There is a major risk that this will lead to tensions and discord between national and international actors, and also between international actors from different schools of thought. To some extent, the future of the sector depends on how stakeholders handle the change that is needed in terms of the role and recognition of local and national actors. These discussions should include the actors that are concerned and should take into account the different aspects of the question.

Localisation should not be seen predominantly as a way of saving money. Although the large scale involvement of national and local organisations would lead to a significant reduction in humanitarian costs in the long run, this should not be the main rationale for pushing ahead with this agenda. Other key issues are at stake: relevance, appropriateness and adaptation, greater speed and efficiency, increased capacity to access populations, better links between humanitarian aid and development, strengthened resilience, etc. At the same time, the issue should not be approached naïvely: no one is immune to bias or imperfection, whether we are talking about national, local or international actors. The risks of pushing the localisation agenda further have been highlighted by several authors (Schenkenberg 2016, Dubois 2016). So, is the current system functioning sufficiently well that we can avoid engaging in a strategic way in aid localisation? The answer is “no”.

The way the international humanitarian sector works is widely criticised, and not only by local actors. The “localisation” agenda is an opportunity to improve the system but if not handled well, it will lead to more tensions and increased competition.

The ongoing dialogue due to various global initiatives and exchanges in connection with this study, is having a significant influence in raising awareness among local and national actors of their role in humanitarian response. This awareness needs to increase within countries, promoted by greater exchange between local, national and international actors and needs to be matched by tangible and genuine shifts in policy.

Localisation as a concept is gaining ground and is changing narratives and positions not only at the international level, but also at the local level. Local organisations are growing in strength and impact, becoming more organized, informed, and engaged. However, the localisation debate remains essentially conceptual and the majority of discussions about meeting the commitments of the Grand Bargain

are currently taking place at the international level, with limited engagement from local actors, and are primarily focused on the issue of funding. The issues outlined herein, in addition to funding, are key to changing current practice. Investment in the sustainability of local actors, beyond a humanitarian crisis, is critical, and this investment is about more than just money.

5.2 Recommendations

Partnership policy

Trócaire should update its partnership policy, drawing on decades of experience to strengthen humanitarian and development partnerships. In particular it should:

- Review funding strategies to avoid competing with local partners over the same funding sources (e.g. CBPF), and prioritise funding opportunities not directly accessible to local organisations;
- Avoid cyclical short-term project-based approaches that do not effectively support partners to strengthen their operational and institutional capacities;
- Commit to partnerships beyond the length of a contract via a Memorandum of Understanding that captures shared ambitions and goals, linked to longer term strategic objectives.
- Work with partners to develop institutional funding strategies that include analysis on minimum core costs required for 'lean' periods (i.e. in between grants)
- Support partners in receipt of funds indirectly, in partnership with Trócaire to plan for strengthening systems and competencies to gradually receive large grants and manage higher levels of risk
- Increase consortium approaches with local partners in order to provide them with new funding opportunities and approaches to funding and jointly advocate with donors on the value of the contribution of each actor within the consortium,

- Work with partners to advocate with donors for multiyear funding in specific contexts, especially protracted settings which sit between humanitarian and development contexts
- Work strategically with partners on organisational capacity building & capacity strengthening methods, cognisant of other capacity building endeavours underway supported by other donors (e.g. secondment, multi-year support, etc.)
- Develop a framework to evaluate/value the capacity building support provided by Trócaire to partners
- Explore how capacity building towards sustainable organisations can be provided within the current funding environment with specific attention to women-led organisations and the promotion and retention of women in local NGOs
- Work with local partners to secure specific funding for institutional capacity building
- Engage in medium- and long-term strategic thinking with partners about their economic models, financial sustainability and strategic approaches to link relief and development.

Supporting local civil society in humanitarian settings

- Encourage and actively facilitate exchanges between international donors/partners of the same local organisation to move from a project-based approach to an institution strengthening approach.
- Support the coordination of local NGOs to strengthen local civil society and establish more strategic links for advocacy with *Shifting the Power*¹⁴;
- Support and foster local learning, and the exchange of experiences and innovations between local actors as well as between local and international actors.

¹⁴ <http://www.actionaid.org/publications/shifting-power>

Localisation

- In all advocacy on localisation, Trócaire should include the Grand Bargain commitment to increase and support *“multi-year investment in the institutional capacities of local and national responders through collaboration with development partners and incorporating capacity strengthening in partnership agreements”* which tends to be forgotten in favour of the commitment to increase direct funding.
- Trócaire should advocate and actively support the inclusion of local partners in global discussions about localisation or organising global exchanges at the local level to ensure local actors are able to contribute to the discussions so that their views are heard and challenges are recognised and explored.
- Trócaire should raise awareness at country level and in international forums about the risks related to localisation if it is not managed well at the global level.

Making funding work to support localisation commitments

This research has prompted dialogue between Trócaire, our direct partners, and other national and international actors. Donors are also exploring how to meet commitments of the Grand Bargain, particularly on Localisation. There are a host of dynamics connected to strengthening the role and expanding the space for local and national actors in humanitarian action. Partners repeatedly list specific steps that would make their work easier, strengthen their capacity and sustain their capability to respond to crises. These steps listed below are relevant to Grand Bargain Signatories, international NGOs and International Organisations, and donors- especially those present and engaged in humanitarian dialogue, via Humanitarian Country Team membership, and those keen to support local actors directly in a strategic and comprehensive way. They are:

- 1. Increase flexible administrative costs** - Recognise the limitations on local actors that have limited access to unrestricted funding or flexible funding to cover core costs to critical support systems such as Human Resources, Logistics and Finance. Short-term commitments of support that are project-based assume that national NGOs have other sources of income to cover gaps – most do not;
- 2. Plan in years, not in months** - Transitioning funding from INGOs to local actors should not be a kneejerk to the Grand Bargain but a phased, well-planned and negotiated process, whereby local actors are adequately positioned, with the requisite organisational infrastructure and humanitarian technical capacity to take on the increased risk and demands;
- 3. Promote smart, strategic capacity support** - Capacity-strengthening, (both technical and organisational) must be strategic and complimentary, supporting the strategy of the organisation, beyond the lifetime of any one particular grant;
- 4. Be transparent on funding availability and eligibility** - Mindful of the time and resources required to prepare proposals. Open calls for proposals when selected partnerships will have an advantage are demoralising and frustrating for local actors;
- 5. Acknowledge the cost of engagement to local actors** - Engage in discussion with local actors to understand the steps of securing funding, the logistical challenges of maintaining a consistent presence within the cluster system, the cost of this and develop an understanding of how local organisations cover these costs to respond to varied demands from donors and partners.

ANNEXE 1:

Key documents

Localisation of aid

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- Time to let go: Remaking humanitarian action for the modern era*, Christina Bennett, Matthew Foley, Sara Pantuliano, Humanitarian Policy Group, ODI, April 2016, 84 p.

<http://www.odi.org/sites/odi.org.uk/files/resource-documents/10422.pdf>
- A World at risk: Humanitarian response at a crossroads*, Care, Mercy Corps, Oxfam America, International Rescue Committee, US Institute of Peace, Save the Children US, WFP, US Fund for UNICEF, April 2016, 48 p.

http://wfpusa.org/sites/default/files/resources/wfp_policy_paper_crossroads_wfp.pdf

Webinar

- *How can we better involve national actors in humanitarian coordination?* Alnap Webinar Series on Coordination, 22 march 2016, 72 mn.
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Transcript (19 p.): <http://www.alnap.org/resource/22123>
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ANNEXE 2:

Trócaire Minimum Requirements for Partnership Funding

Partnership¹⁵ with local civil society organizations is fundamental to Trócaire's work in the developing world. However, as a donor organisation, Trócaire has its own internal and external standards and requirements that it must take into consideration before deciding to support a partner agency. Trócaire has therefore identified a set of Minimum Requirements for Partnership Funding. These are benchmarks which Trócaire considers essential practices in any partner agency before funds can be transferred. These requirements provide Trócaire with the necessary assurance that there is sufficient capacity in a partner agency to responsibly manage project funds.

No.	MINIMUM REQUIREMENTS
1	There is an active and effective Board in place (as per nationally accepted standards and norms) or equivalent governing body ¹⁶ , and minutes are available from a board meeting within the last 12 months
2	The organisation is registered with the appropriate authorities ¹⁷ and has a certificate of registration ¹⁸
3	The organisation is compliant with its statutory human resource obligations as per national legislation such as employer/employee tax, payment of benefits, etc.
4	It is clear who the 'budget holder' is for the project level budget ¹⁹
5	Budget calculations are clear & understandable to Trócaire Programme & Finance Officers.
6	There is a cashbook (accounting records) representing all transactions
7	All original bank statements are held on file in chronological order
8	The bank statement is reconciled to the accounting records at the end of every month. This includes a list of any non-reconciled items. The reconciliation is signed and dated by both the preparer and a senior manager.
9	The bank account(s) are in the name of the organisation and/or project

¹⁵ Under the Trócaire Partnership Policy, a partnership is defined as 'a relationship with another civil society organisation (CSO) that Trócaire supports in some form to achieve mutually agreed objectives, with the ultimate aim of serving the basic needs and supporting the rights of poor and marginalised people in the developing world'

¹⁶ In the case of a Church organisation, an equivalent governing body which ensures accountability is acceptable in meeting this requirement (e.g. Bishops' Conference or related structure), Please see PFMM for detailed guidance: Annex A, Section 1.1.

¹⁷ In the case of a Church partner, which is not registered as a separate entity but is part of a Diocese, registration of that Diocese is sufficient to meet this MR

¹⁸ In exceptional cases, such as a collapse of state institutions or operating in a contested territory, Trócaire's requirement that an organisation is registered may be waived. This is an internal decision in Trócaire that must involve country management and be authorised by the Director of the International Division or Humanitarian Programme Manager See section on Exceptions.

¹⁹ See the PFMM, Annex A, Section 4.3 for detail on what a 'budget holder' means

10	If the accounting system in place cannot distinguish between donor funds, there is a separate bank account in place for Trócaire funds
11	Bank accounts have a minimum of two signatories and cheques are never pre-signed
12	A cash count is conducted at least once a month by a person (usually a manager) who is not the person responsible for managing the cash. The cash count is signed and dated and reconciled to the cash book balance.
13	There is a separation of duties between the preparation and approval of all financial transactions
14	3rd party original supporting documentation is in place for all receipts and payments
15	<i>[Only applicable to partners receiving humanitarian funds]</i> Implementation of Trócaire's procurement procedures is mandatory if a partner does not have their own written procurement guidelines of an equivalent standard or higher.
16	The partner organisation has a policy or a statement of commitment ²⁰ regarding the safeguarding of programme participants (including children), staff, volunteers and other third parties working on their behalf, against any form of exploitation and abuse.
17	The partner organisation accepts that they have primary responsibility for their organisation's security and that of their staff. ²¹
18	The partner organisation has made a clear commitment to promote Gender Equality by addressing the different rights and needs of women and men in all programme work and by addressing gender inequalities within its own organisation. ²²

²⁰ 'Risk of imposing a flawed blueprint model of humanitarian response on local actors'

²¹ Clear acceptance of responsibility by the partner organization is sufficient to meet the security MR. Organisations do not fail the MR assessment if they do not have Security Policy or Plans in place at the time of the assessment. However, they must demonstrate an awareness of organizational duty of care and a willingness to address security-related risk. Evidence of this may be in the form of a formal statement by the Chair of the Board or Director of the organization, or may be implied through references to security in strategic and operational planning documents that the organization uses to guide its work.

²² This MR is an assessment of alignment to Trócaire values, rather than a technical assessment. Therefore, organisations must be able to demonstrate that they have a commitment to promoting equal rights and opportunities of women and men both internally in the organisation and in programmes. There does not need to be technical proficiency in this area at the time of doing the MR assessment. However, statements of intent, e.g. in Strategic Plans, Annual Plans, Gender Policy statement or project plans and reports, should demonstrate that there is a real recognition of the different needs of women and men and a commitment to attempting to address these. If this is not currently in the plans or project documents of the organisation, partners should at a minimum give a commitment to drive this at management level with dedicated actions within one year.



Hong Sar Htaw (26) from Bilugyun island, Myanmar, with Agatha Nu Nu of Trócaire. Hong is a member of a women's group that gives women a voice in local decision-making, as well as offering loans for women to start or expand businesses. (Photo: Eoghan Rice / Trócaire)

Trócaire was established in 1973 with a dual mandate is to support the most vulnerable people living in the world's poorest regions, while also raising awareness of injustice and global poverty at home. Today Trócaire works in partnership with local and church organisations, supporting communities in over 20 countries across Africa, Asia, Latin America and the Middle East to bring about lasting change. Trócaire is a member of **Caritas Internationalis**, the Catholic Church's global confederation of 165 development agencies. Trócaire is also a member of **CIDSE, the international alliance of Catholic development agencies**, which works together for global justice. The CIDSE membership has a presence in over 118 countries and territories worldwide: www.trocaire.org

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