



# Country-level Financing Solutions for Local Actors

Research Report

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## About this report:

This document is the final report for a research project on “Country-level Financing Solutions for Local Actors” commissioned by the International Federation of Red Cross and Red Crescent Societies (IFRC), funded by the European Civil Protection and Humanitarian Aid Operation (ECHO) and carried out by Owl RE, research and evaluation consultancy, Geneva, Switzerland.

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Cover photo: Stephen Ryan / IFRC. Displaced people receiving non-food relief items on behalf of their families outside the Kharkiv branch office of the Ukrainian Red Cross Society in May 2015.

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## Executive Summary

This document is the final report for a research project on “Country-level Financing Solutions for Local Actors” commissioned by the International Federation of Red Cross and Red Crescent Societies (IFRC), funded by the European Civil Protection and Humanitarian Aid Operation (ECHO) and carried out by Owl RE, research and evaluation consultancy, Geneva, Switzerland. The IFRC currently serves alongside the government of Switzerland as the co-convener of the Grand Bargain’s “Localisation Workstream”.

This final report is complemented by case studies on three countries (Colombia, Ethiopia and Ukraine), a literature review and accompanying guidance note (separate documents). In total, 105 persons were interviewed for this research across the three countries and at the global level.

In May 2016 at the World Humanitarian Summit, donors and humanitarian agencies signed the Grand Bargain, agreeing to a series of changes in their working practices in order to improve the efficiency and effectiveness of humanitarian aid. Among its provisions are commitments to promote “*more support and funding tools to local and national responders*.” These localisation commitments included a target of 25% of global humanitarian funding to be channelled “as directly as possible” to local and national responders by 2020. However, progress to date has been slow with “directly as possible” funding currently under 10% of total humanitarian funding.

The research responded to the following objectives:

- To identify good practices and opportunities on country level financing within the framework of the Grand Bargain localisation commitment to provide funding more directly to local and national responders.
- To provide guidance on how to strengthen national and local actors’ access to greater humanitarian financing.

## Findings

### Current humanitarian financing solutions used by local actors

L/NNGOs receive the large majority of their humanitarian funding through international intermediaries, mainly INGOs and UN agencies, often through partnerships and/or as sub-grantees for humanitarian response. Local government agencies mainly receive funding from their national, regional and/or sub-regional governments. In the three case study countries where humanitarian funding was received directly (with no operational intermediaries), the financing was nearly always provided through a pooled fund.

INGO and UN funding was often project-driven (between 3-12 months duration) and based on a sub-grantee relationship where L/NNGOs had limited agency rather than a partnership model. There were exceptions seen where INGOs and UN agencies did enter into longer term partnerships contributing to overhead costs and building the capacity of L/NNGOs. In certain crisis-affected countries, humanitarian funding was also available to L/NNGOs from their governments.

**Factors influencing decision-making** as to whether to provide financing to L/NNGOs included: Proven field experience; previous experience as a partner for INGOs, pooled funds or UN agencies; knowledge of the local context; local presence and access; capacity to move into new areas; availability of appropriate human resources; budget expediency; previous and proven experience in administrative management; official registration in-country. A significant number of barriers were also identified that hinder the ability of L/NNGOs to access direct or “directly as possible” humanitarian funding: Operational history; financial and management capacities; grant management abilities; donor priorities and restrictions; disbursement cycles; access to information and coordination fora; administrative costs and overheads; political barriers; regulatory barriers and availability of human resources.

**Risks perceived in funding directly L/NNGOs** were mainly fiduciary and legal/compliance issues, as these are the risks most closely linked to the provision of financing. The ability of L/NNGOs to meet donor government due diligence requirements is an oft-cited reason for the continued provision of humanitarian financing to international actors. Ethical and reputational risks were also perceived to a lesser extent as possible risks of direct funding; more so the risk that L/NNGO behaviour, if inappropriate, would reflect badly on their donor or international partner. According to donors, in a crisis situation, time may be insufficient to build quality relationships, or assess and strengthen the capacities of local or new actors; and therefore, the risks are greater than the benefits. This has resulted in a continuation of financial support to larger and mostly international actors.

**The advantages of funding directly L/NNGOs** overlap with the above listed factors of decision-making on L/NNGO funding, notably; L/NNGOs proximity, acceptance and access to local communities; L/NNGOs ability to identify humanitarian needs; L/NNGOs know-how and understanding of local cultures and contexts; the potential for sustainability of L/NNGOs activities over time; the ability of L/NNGOs to react and mobilise quickly; the potential cost-savings of L/NNGOs operations compared to INGOs and UN agencies.

**Mitigating risks:** Measures identified that have been adopted to mitigate risks associated of funding L/NNGOs include: capacity strengthening of L/NNGOs; shifting the partnership model from “police” to partner; harmonising and simplifying due diligence requirements; contributing to overhead costs of L/NNGOs; pre-screening of L/NNGOs; partnering with experienced L/NNGOs; and working with private sector, pooled funds, INGOs and UN agencies as intermediaries to L/NNGOs.

### **Legal and policy enabling and restricting factors for L/NNGO direct funding**

**Enabling factors in crisis-affected countries:** In some countries, governments have indirectly promoted localisation by restricting the ability of international actors to implement humanitarian responses. Another enabling factor identified was governments fostering a legal and policy environment that allowed L/NNGOs to operate freely and to accept foreign funding.

**Restricting factors in crisis affected countries:** Prohibitive legal and policy environments that have restricted the ability of L/NNGOs to receive direct funding include: restrictions on receiving foreign funding; restrictions in carrying out humanitarian operations (in a given area or in general); cumbersome registration processes; excessive supervision and reporting requirements for L/NNGOs; lack of tax exemptions for L/NNGOs; and bureaucratic barriers for the entrance of humanitarian goods.

**Enabling factors in donor countries:** A key enabling factor for donor countries has been the commitments made in relation to the Grand Bargain. All of the leading eight donor governments



reviewed have reported that since 2016 they have increased their direct funding to L/NNGOs and/or have adapted their policies to facilitate greater direct funding or are in the process of doing so (see annex 1).

**Restricting factors in donor countries:** Of the donors reviewed, only the European Union (EU) has a legal restriction to directly fund L/NNGOs for humanitarian activities; the restrictions of donors were mainly their own policy choices. For example, over the years, donor governments have established long-term relationships with INGOs and UN agencies which has become a preferred way of working. Another factor was the inability of L/NNGOs to meet the due diligence requirements of donors with L/NNGOs reporting carrying out multiple or similar due diligence exercises for different partners (donors but also INGOs, pooled funds and UN agencies). Counter-terror legislation has created significant barriers to enabling partnerships with local actors in many countries. Anti-money laundering regulations are also putting increasing pressure on both international and local actors.

**Development funds as possible alternatives for humanitarian funding:** The availability of development funds as a possible alternative or supplement to humanitarian funding for L/NNGOs is still at a relatively early stage of implementation. Development funding for L/NNGO institutional strengthening has indirectly supported their ability to carry out humanitarian activities. Colombia provides an example where funding has been increasingly directed towards peace-building and transformation initiatives where funding opportunities are available to L/NNGOs.

### **Pooled funds serving L/NNGO funding**

**UN Office for the Coordination of Humanitarian Affairs (OCHA) Country Based Pool Funds (CBPFs):** in 2018, the 18 CBPFs dispersed US\$208 million (25% of their total) directly to L/NNGOs. CBPFs remain a small component of overall humanitarian funding—only 2.8% of total funds in 2018. In the three countries studied, the CBPFs are at different stages; in Ethiopia, the CBPF has been operational since 2006 and in 2018 only 3% of funds went directly to L/NNGOs; in Colombia, the CBPF was closed in 2017 and in its final year 48% of funds went directly to L/NNGOs; in Ukraine, the CBPF has been launched in February 2019 and funding distribution was planned for late 2019.

**The Start Fund:** In 2017/18, the Start Fund reported that at least 21% of its funding was for local and national partners. In both Ethiopia and Colombia, all Start funding to date has gone to INGOs with possibly some L/NNGOs as implementing partners. The Start Fund is piloting a tiered due diligence model for L/NNGOs combined with a capacity strengthening framework. NGO-managed country-level pooled funds are being launched in select crisis-prone countries, with Bangladesh being the first pilot country.

**Disaster Relief Emergency Fund (DREF):** The DREF was established by the IFRC in 1985 to provide immediate financial support to National Red Cross and Red Crescent Societies to respond to small, medium and large-scale emergencies as first responders. Funds for the DREF are sought through an annual appeal and are available to all 190 National Societies. In 2018, 116 allocations for 92 operations (some US\$24m) were made directly to 61 National Societies working in their own countries. The National Societies of Colombia and Ethiopia have both received DREF funding.

**The National Society Investment Alliance (NSIA)** is a pooled funding mechanism providing flexible, multi-year financing and support for the development of National Societies, strengthening their capacity to deliver relevant and effective humanitarian services. First allocations from

the NSIA were made in May 2019 to 10 National Societies with the National Societies of both Colombia and Ukraine awarded funding.

**The Central Emergency Response Fund (CERF)** was launched in March 2006, providing both a grant facility and a loan facility in response to new emergencies. Allocations are made to UN agencies which can then create sub-grants for implementing partners: 2017 research highlighted that grants to local and national responders ranged between 4 and 22% of CERF funding.

**DFID's HARP Facility** in Myanmar provides a positive example of flexibility and innovation in relation to funding national and local humanitarian organisations, providing financial support for capacity strengthening as well as service delivery, including on a multi-year basis.

**Trust Funds** have been established by different international actors including the EU and the UN. As detailed in the Colombia case study, an EU Trust Fund has been established in Colombia with limited funding available for L/NNGOs (US\$3.3m out of US\$133m total). Similarly, a UN Multi-Partner Trust Fund has been established in Colombia with 30% of funding intended for civil society (INGOs and L/NNGOs).

**Barriers for L/NNGO actors to access pooled funds** included: the lack of multi-year funding for grantees; underfunding of CBPFs, inflexibility of budgeting rules; heavy transaction costs for L/NNGOs; cumbersome application processes and oversight arrangements; lack of separate funding streams for women-led and women-run organisations; access to information on funding opportunities.

### Domestic resource mobilization for humanitarian action

Opportunities for L/NNGOs to raise funds for humanitarian action domestically were found to be limited. However, examples were seen in the three countries and elsewhere where domestic resource mobilization by L/NNGOs was carried out successfully using the following strategies: Fundraising directly with the public; business support and linking with corporate social responsibility projects; annual membership fees for L/NNGOs; crowdfunding for humanitarian response; and Income generation activities, such as renting out training or meeting room facilities.

Support for domestic resource mobilization from international actors is an area in which capacity building and knowledge could be provided. However, experienced L/NNGOs in domestic resource mobilization could be even more appropriate to provide capacity strengthening to other less experienced L/NNGOs.

## Conclusions

Access to humanitarian funding for L/NNGOs has slowly increased with all stakeholders making concerted efforts to change their approaches and policies in line with their Grand Bargain commitments.

**Direct funding from donor governments** for L/NNGOs without an intermediary builds mutual trust and respect, is cost-effective and readdresses power balances. But to date there is relatively little direct funding occurring. This type of funding deserves to be increased and encouraged, possibly learning from other sectors/areas such as development and institutional building. Compliance and administrative burdens can be mitigated with suggested actions found in the accompanying guidance note.

However, **barriers persist for direct funding to L/NNGOs** with some that will remain, notably the preference of donor governments to work through international intermediaries, which is still considered “direct as possible”. Therefore, actions are needed to ensure that when L/NNGOs receive funding through intermediaries they are also supported in their sustainability and capacity to respond to humanitarian crises.

**Pooled funds will remain a key funding source** for L/NNGOs and indications are that their role will increase. Pooled funds deserve a greater share of humanitarian funding while efforts are needed to make them more accessible and orientated to L/NNGOs.

**The legal and regulatory environment** is overall favourable to direct humanitarian funding to L/NNGOs. Governments of crisis-affected countries need to ensure that L/NNGOs are able to operate freely and receive foreign funding without facing penalties or disadvantages. Donor governments, who are incrementally adapting their policies to support greater direct funding, need to accelerate this further, such as by finding consensus on reporting, risk assessments and compliance requirements for L/NNGOs.

**L/NNGOs will remain development and humanitarian actors** as many of their comparative INGOs are. L/NNGOs should find further synergies with their development activities, including funding and develop more diverse funding sources, including domestic resource mobilization.

These conclusions are reflected in the action-focused points in the accompanying guidance note drafted jointly with this report (separate document) on how to strengthen access of local and national actors to greater humanitarian financing.

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## Acronyms and abbreviations

<b>CBPF</b>	Country-based pooled fund
<b>CRC</b>	Colombian Red Cross
<b>CSO</b>	Civil society organisation
<b>DFID</b>	UK Department for International Development
<b>DRC</b>	Democratic Republic of Congo
<b>DREF</b>	Disaster Relief Emergency Fund
<b>EC</b>	European Commission
<b>ECHO</b>	European Civil Protection and Humanitarian Aid Operation
<b>EHF</b>	Ethiopia Humanitarian Fund
<b>ERCS</b>	Ethiopian Red Cross Society
<b>ERF</b>	Emergency Relief Fund (Colombia)
<b>EUTF</b>	European Union Trust Fund
<b>FARC</b>	Fuerzas Armadas Revolucionarias de Colombia
<b>FTS</b>	Financial Tracking Service
<b>HC</b>	Humanitarian Coordinator
<b>HRP</b>	Humanitarian Response Plan
<b>ICRC</b>	International Committee of the Red Cross
<b>IFRC</b>	International Federation of Red Cross and Red Crescent Societies
<b>IOM</b>	International Organization for Migration
<b>INGO</b>	International non-governmental organisation
<b>L/NGO</b>	Local or international non-governmental organisation
<b>NGCA</b>	Non-government-controlled area (Ukraine)
<b>NRC</b>	Norwegian Refugee Council
<b>NSIA</b>	National Society Investment Alliance
<b>OCHA</b>	UN Office for the Coordination of Humanitarian Affairs
<b>PSEA</b>	Protection from sexual exploitation and abuse
<b>RCM</b>	International Red Cross and Red Crescent Movement
<b>RRF</b>	Rapid response funds
<b>SHF</b>	Syria Humanitarian Fund
<b>SIDA</b>	Swedish International Development Agency
<b>UHF</b>	Ukraine Humanitarian Fund
<b>UN</b>	United Nations
<b>WHS</b>	World Humanitarian Summit

# 1. Introduction

This document is the final report for a research project on “Country-level Financing Solutions for Local Actors” commissioned by the International Federation of Red Cross and Red Crescent Societies (IFRC) and carried out by Owl RE, research and evaluation consultancy, Geneva, Switzerland. The IFRC currently serves alongside the government of Switzerland as the co-convenor of the Grand Bargain’s “Localisation Workstream”.<sup>1</sup> This research is supported by the project “How to Go Local: Delivering on the Grand Bargain” funded by the European Civil Protection and Humanitarian Aid Operation (ECHO).

This final report is complemented by case studies on three countries, Colombia, Ethiopia and Ukraine and a literature review (separate documents). The findings of the research are the basis for an accompanying guidance note (separate document).

The research project was carried out by a six-person team: Glenn O’Neil (Switzerland), team leader, Lois Austin (UK), lead researcher, Huda Shashaa (Jordan), researcher, José Luis Barreiro (Colombia), national consultant, Abiyot Tilahun Eshete (Ethiopia), national consultant and Dina Volynets (Ukraine), national consultant.

In total, 105 persons were interviewed for this research across the three countries and at the global level. See section 4 for further details.

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<sup>1</sup> Information about the plans and activities of the Workstream is available at: [https://media.ifrc.org/grand\\_bargain\\_localisation/home/](https://media.ifrc.org/grand_bargain_localisation/home/)

## 2. Background

In May 2016 at the World Humanitarian Summit (WHS), donors and humanitarian agencies signed the Grand Bargain, agreeing to a series of changes in their working practices in order to improve the efficiency and effectiveness of humanitarian aid. Among its provisions are commitments to promote “*more support and funding tools to local and national responders*.” These localisation commitments include promoting more equal partnerships, ensuring better integration with local coordination mechanisms, providing more support for the long-term institutional capacity of local actors, and an aggregate target of 25% of global humanitarian funding to be channelled “as directly as possible” to local and national responders by 2020.

Subsequent to the adoption of the Grand Bargain, signatories agreed to definitions for “local and national responders” for the purposes of this goal, as well as the meaning of “direct funding”. With regard to the meaning of “direct as possible”, it was agreed to track funds that travelled through no more than one single intermediary as well as pledges to pooled funds that can be directly accessed by local and national actors.<sup>2</sup>

However, progress to date has been slow with estimates varying but all indicate that “as directly as possible” funding is currently under 10% of total humanitarian funding. According to the 2018 Financial Tracking Service (FTS) managed by the UN Office for the Coordination of Humanitarian Affairs (OCHA), only 3.1% of total humanitarian assistance went “as directly as possible” to local and national actors (state or non-state) in 2018 with local/national non-governmental organisations (L/NNGOs) receiving an even smaller portion—just 0.4%, the same as in 2017 and an increase of just 0.1% from 2016.<sup>3</sup>

The 2019 Grand Bargain independent report concludes that there is a ‘slow but steady’ increase of funding to local and national actors: it estimates that 8.74% of global funds were received by local and national actors (including National Societies of the international Red Cross and Red Crescent Movement (RCM), L/NNGOs and national and local government) up from 2.9% in 2017 and 2% in 2016.<sup>4</sup>

The Charter for Change Initiative, which saw International NGOs (INGOs) at the WHS commit to increase funding to southern L/NNGOs, reported in 2019 that 94% of its 25 signatories were channelling 20% or more of their funds to L/NNGOs.<sup>5</sup>

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<sup>2</sup> The agreed definitions and categories of measurement are available at <https://bit.ly/2F4Ff3n>

<sup>3</sup> ALNAP (2018) The State of the Humanitarian System. ALNAP Study. London: ALNAP/ODI. Page 18. <https://sohs.alnap.org/help-library/the-state-of-the-humanitarian-system-2018-full-report>; Development Initiatives (June 2019), key trends in global humanitarian assistance—Fact sheet: [http://devinit.org/wp-content/uploads/2019/06/Factsheet\\_key-trends-in-global-humanitarian-assistance\\_2019.pdf](http://devinit.org/wp-content/uploads/2019/06/Factsheet_key-trends-in-global-humanitarian-assistance_2019.pdf)

<sup>4</sup> HPG/ODI (2019) HPG/ODI (2019) Grand Bargain annual independent report: 2019, p. 35: <https://www.odi.org/sites/odi.org.uk/files/resource-documents/12734.pdf>

<sup>5</sup> Charter for Change: From commitments to action. Progress Report 2018-2019 [https://charter4change.files.wordpress.com/2019/06/c4c\\_progressreport\\_2019.pdf](https://charter4change.files.wordpress.com/2019/06/c4c_progressreport_2019.pdf)

The commitments made under the localisation workstream are highlighted in the table below:

**Table 1: Commitments of the localisation workstream**

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**Commitment 2.1:** Increase and support multi-year investments in the institutional capacities of local and national responders, including preparedness, response and coordination.

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**Commitment 2.2:** 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.

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**Commitment 2.3:** 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.

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**Commitment 2.4:** Achieve by 2020 a global, aggregated target of at least 25% of humanitarian funding to local and national responders as directly as possible to improve outcomes for affected people and reduce transaction costs.

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**Commitment 2.5:** Develop, with the Inter-Agency Standing Committee, and apply a localisation marker to measure direct and indirect funding to local and national responders.

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**Commitment 2.6:** Make greater use of funding tools that increase and improve assistance delivered by local and national responders, such as UN-led Country Based Pooled Funds (CBPFs), the IFRC Secretariat's Disaster Relief Emergency Fund (DREF) and NGO-led and other pooled funds.

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This research has taken all the above commitments into consideration but with an emphasis on those elements specifically linked to financing.

## 2.1. Definitions

The definition of local and national actors used in this report is taken from the Grand Bargain Localisation Workstream<sup>6</sup> as follows:

**Table 2: Key definitions for localisation funding:**

Category	Sub-category	Definition
<b>Local and national actors</b>	Local and national non-state actors	Organisations engaged in relief that are head-quartered and operating in their own aid recipient country and which are not affiliated to an INGO. A local actor can be part of a global network, confederation or alliance; but it must maintain independent fundraising and governance systems to be considered a local actor.
	National and sub-national state actors	State authorities of the affected aid recipient country engaged in relief, whether at local or national level.
<b>Direct funding</b>	Direct funding (donors)	Direct funding from the original donor to local and national actors for humanitarian purposes.
	Direct funding (aid organisations)	Direct funding to local and national actors coming from privately raised donations.
<b>Indirect funding to be tracked</b>	Pooled funding	Funding channelled through a pooled fund that is directly accessed by local and national actors e.g. country-based pooled fund (CBPF), Disaster Relief Emergency Fund (DREF), START.
	Single intermediary	Funding to a single international aid organisation (including a federated/membership organisation) that reaches a local/national actor directly from that one intermediary.

This research is predominantly focused upon the first sub-category of local and national actors— namely local and national non-state actors, primarily L/NGOs.

This research noted the important distinction within the above definition between “home grown” L/NGOs and those that are branches of INGOs that have been “localised” in crisis-affected countries by adopting independent fundraising and governance systems, while still remaining part of a global INGO structure or network (see Colombia case study for examples). This latter type of NGO were found to benefit from being part of global INGO structure/network in terms of capacity and access to funding in ways that other L/NGOs, who were not part of an INGO structure/network, did not.

<sup>6</sup> Identified categories for tracking funding flows, developed with the IASC Humanitarian Financing Task Team’s Localisation Marker Technical Working Group. The full text can be found here: [http://media.ifrc.org/grand\\_bargain\\_localisation/wp-content/uploads/sites/12/2018/06/categories\\_for\\_tracking\\_direct\\_as\\_possible\\_funding\\_to\\_local\\_and\\_national\\_actors\\_003.pdf](http://media.ifrc.org/grand_bargain_localisation/wp-content/uploads/sites/12/2018/06/categories_for_tracking_direct_as_possible_funding_to_local_and_national_actors_003.pdf)



### 3. Research objectives and questions

This research relates mainly to the Grand Bargain financing commitment and is intended to provide critical background information in support of the development of a guidance note on this topic. The research has the following two objectives:

- To identify good practices and opportunities on country level financing within the framework of the Grand Bargain localisation commitment to provide funding more directly to local and national responders.
- To provide guidance on how to strengthen national and local actors' access to greater humanitarian financing.<sup>7</sup>

Specifically, the four main research questions are as follows:

- i. What are the factors influencing the humanitarian financing solutions available to local actors?
- ii. What enabling and restricting legal and policy factors exist—both in donor states and within affected states—in relation to the provision of direct or more direct donor funding to local actors?
- iii. In what ways do Country Based Pooled Funds (CBPFs), including, but not limited to, the UN's CBPFs, serve the purpose of localisation?
- iv. What is the key learning and opportunities in relation to domestic resource mobilization for humanitarian actors?

The four key outputs from the research are:

- Three country level case studies (separate document);
- A guidance note on humanitarian financing to local actors (separate document);
- A literature review (separate document);
- This research report.

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<sup>7</sup> Please see Guidance Note (Separate document).



L/NGO SOS Sahel Ethiopia, market development activities;  
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## 4. Research methodology

The research was undertaken at global level and at country level with a focus on Colombia, Ethiopia and Ukraine. Data was collected using a combination of primary and secondary research methods.

- Primary research was carried out at the global and country levels through interviews and discussions with 105 stakeholders. A combination of in-person and remote discussions were held with a selected set of stakeholders.<sup>8</sup> The following table illustrates the different stakeholder groups who provided inputs:

**Table 3: Stakeholders consulted by group**

Stakeholder group	% (Number interviewed)
L/NGOs	37% (39)
INGOs	20% (21)
Donor representatives	16% (17)
UN	15% (16)
RCM	8% (8)
Other (consultancy, think tank, consortium)	4% (4)

<sup>8</sup> Please see Annex 2 for a list of stakeholders consulted.

The emerging findings of the research were presented at the IFRC-led regional localisation workshops in Addis Ababa, Ethiopia and Amman, Jordan in July 2019 and in Jakarta, Indonesia in August 2019. These workshops informed the draft guidance note on humanitarian financing for local actors. Over 80 people attended these presentations and workshops.

Secondary research was carried out mainly at the global level and was a major source of information for the literature review which, as well as being a stand-alone document, supported this report. Additional secondary research was carried out at the country-level. The research was qualitative in nature although any financial data collected (e.g. CBPF data) has been analysed using quantitative methods as appropriate. The list of the main documents reviewed is found at annex 3.

## 5. Research findings

The research findings are presented below in line with the four thematic areas around which the research was centred:

**Table 4: Research themes, questions and sub-questions**

Thematic area	Research questions and sub-questions
Humanitarian financing solutions	What are some of the current humanitarian financing solutions used by local actors?
	According to relevant stakeholders, what factors informed decision-making on financing local and national actors in the case study countries?
	How were risks related to funding for local and national actors mitigated in the case study countries?
	What are the most common perceptions as to the advantages and risks of increased direct funding for local and national responders? To what degree does existing evidence support these perceptions?
Regulatory issues	What legal and policy enabling and restricting factors exist—both in donor states and within affected states—in relation to the provision of direct or more direct donor funding to local actors?
	To what degree do existing laws and policies in each of the major donor countries support or impeded funding to national and local actors?
	Which states have changed their laws or policies to address such barriers and what has their experience been after the changes? Are development funds a possible alternative (in theory or in practice)?
	In what ways do affected states' regulatory environments (including disaster and NGO laws among others) enable or restrict funding to national and local actors?
	How can local actors be better supported by other agencies to address regulatory issues?
Pooled funds	In what ways do country-based pooled funds (CBPF), including, but not limited to, the UN's CBPF, serve the purpose of localisation?
	What are the existing country-based pooled funds that are accessible to local actors and to what extent have these been effective from the perspective of localisation?
	What are the remaining barriers to local actors having increased access to pooled funds and how are these being addressed?
Domestic resource mobilization	What is the key learning and opportunities in relation to domestic resource mobilization for humanitarian actors?
	What are the existing opportunities and threats to domestic resource mobilization?
	In what ways can international actors support local actors on this?



## 5.1. Humanitarian Financing Solutions

### Current humanitarian financing solutions used by local actors

Currently L/NNGOs receive the large majority of their humanitarian funding through international intermediaries, mainly INGOs and UN agencies, often through partnerships and/or as sub-grantees for humanitarian response. National Red Cross and Red Crescent Societies sometimes have a greater funding base through their local volunteer network and RCM international components. Local government agencies mainly receive funding from their national, regional and/or sub-regional governments.<sup>9</sup> This research was not able to identify any direct humanitarian funding opportunities prioritising women-led organisations and/or responses.

**Direct international funding:** In the three case study countries where humanitarian funding was received directly (with no operational intermediaries), the financing was nearly always provided through a pooled fund, such as OCHA-led CBPFs, or in the case of Colombia, from government institutions. This trend has also been seen in other crisis-affected countries.<sup>10</sup> Inclusion in the UN-led annual Humanitarian Response Plans (HRP), which opened up opportunities for direct international funding for L/NNGOs, varied widely in the three countries: for 2019, L/NNGOs ranged from 28% of humanitarian partners included in the HRP in Ukraine; to 4% in Ethiopia; to 2% in Colombia.<sup>11</sup> Even where L/NNGO participation appeared high, as in Ukraine, their funding was low in comparison to international actors; 8.6% of the total 2019 HRP.<sup>12</sup> In Syria, where L/NNGOs are delivering an estimated 75% of humanitarian aid they receive between 0.2 to 0.9% of direct funding (see highlight box on Syria).

In the three countries studied, the majority of L/NNGOs were both development and humanitarian actors and reported much more success in obtaining direct funds for their development activities. For example, in Ethiopia, L/NNGOs had been directly funded by the European Union (EU), the World Bank and donor governments for development, climate change and institutional capacity building projects (see case study). An explanation for this difference was the long-term nature of development and consequent funding arrangements and timelines, compared to humanitarian funding that was more project-based and short-term in nature, even when many crises were found to be cyclical and/or protracted in reality.

**Funding through INGOs and UN agencies:** The large majority of L/NNGOs receive their humanitarian funding through INGOs and UN agencies, both in the three countries studied and in other crisis-affected countries. This funding was often project-driven (between 3–12 months duration) and based on a **sub-grantee relationship** where L/NNGOs had limited agency rather than a partnership model.<sup>13</sup> Previous research has found that such funding to L/NNGOs was transactional in nature, hindering any longer-term investment or sustainability for the implementing L/NNGO.<sup>14</sup> In the three countries covered by this research, L/NNGOs confirmed that this type of funding was time-limited in nature focusing primarily on the current response.

<sup>9</sup> HPG/ODI (2019) Op Cit.

<sup>10</sup> for example NNGOs in South Sudan in 2017 reported 99.5% of their funding was from international sources: 0.5%—private donors; 41%—UN agencies, 26%—INGOs, 28%—CBPF, 4.5%—Bilateral government donors; source: <https://www.odi.org/sites/odi.org.uk/files/resource-documents/12469.pdf>

<sup>11</sup> Ukraine: 12 L/NNGOs of 43 partners; Ethiopia: 3/81; Colombia: 3/122: [https://www.humanitarianresponse.info/sites/www.humanitarianresponse.info/files/documents/files/ukraine\\_2019\\_humanitarian\\_response\\_plan\\_en.pdf](https://www.humanitarianresponse.info/sites/www.humanitarianresponse.info/files/documents/files/ukraine_2019_humanitarian_response_plan_en.pdf); [https://reliefweb.int/sites/reliefweb.int/files/resources/2019\\_HRP\\_030719.pdf](https://reliefweb.int/sites/reliefweb.int/files/resources/2019_HRP_030719.pdf). [https://www.humanitarianresponse.info/sites/www.humanitarianresponse.info/files/documents/files/hrp\\_2019\\_english.pdf](https://www.humanitarianresponse.info/sites/www.humanitarianresponse.info/files/documents/files/hrp_2019_english.pdf)

<sup>12</sup> US\$14m of US\$162m total requests. Ukraine HRP 2019. Ibid.

<sup>13</sup> InterAction and Humanitarian Outcomes (2019). NGOs and Risk: Managing Uncertainty in Local-International Partnerships: <https://www.interaction.org/wp-content/uploads/2019/03/Risk-Global-Study.pdf>

<sup>14</sup> Poole, L. (2018). Turning Rhetoric into Resources: Transforming the Financing of Civil Society in the Global South, NEAR Network: <https://www.humanitarianoutcomes.org/publications/turning-rhetoric-resources-transforming-financing-civil-society-global-south>



There were exceptions seen where INGOs and UN agencies did enter into longer term partnerships with L/NNGOs for humanitarian response, contributing to their overhead costs and building their capacity, such as ActionAid in Ethiopia or Diakonia in Colombia (see case studies). A 2019 study estimated that only 10–20% of conflict-driven humanitarian programming of INGOs is carried out in partnerships, where it is used as an adaptive measure to extend operations in insecure or inaccessible areas.<sup>15</sup> Both L/NNGOs and INGOs interviewed indicated that the short-term project nature of humanitarian funding limited the ability to develop longer term partnerships.

Another possibility for L/NNGOs was through participation in consortia, often with UN agencies or INGOs as lead grantees. The ACCESS consortium in Ukraine provides an example of INGOs and L/NNGOs coming together to provide multi-sector humanitarian assistance. The consortium consists of three INGOs and two L/NNGOs, is funded by ECHO and is currently in its third phase (see case study).

Some INGOs have also made funds available to their L/NNGO affiliates/partners for quick and urgent responses from **rapid response funds** (RRF) (often in the range of US\$20–150,000). For example, in Ethiopia, the Danida RRF is accessible for L/NNGO partners of Danish Church Aid; the RRF of the ACT Alliance is available to L/NNGO members; and Catholic Relief Services has emergency funds available for mainly faith-based L/NNGO partners. The IFRC similarly administers the Disaster Relief Emergency Fund (DREF), which is available to National Societies for small “start-up” loans against future appeal income in the initial days after a major disaster, as well as grants for small and medium disasters.

From the perspective of L/NNGOs, the key advantages and disadvantages in relation to receiving funding from INGOs and UN agencies are detailed in the following table:

**Table 5: Advantages and disadvantages for L/NNGOs receiving funding from INGOs and UN agencies**

Advantages for L/NNGOs	Disadvantages for L/NNGOs
Access to the logistics and administration support and services of INGOs and UN partners.	UN agencies and INGOs are not always willing to develop equitable partnerships which include capacity strengthening due to a fear of losing market share.
Technical, operational, and capacity strengthening support from INGOs and UN agencies that in turn makes them more eligible for direct funding.	L/NNGOs do not always receive the overhead costs from which their INGO or UN partner has benefitted, leaving them struggling to cover ongoing overhead and administrative costs.
International partners carry the due diligence burden on behalf of the L/NNGOs.	Not being a direct contractor limits L/NNGO ability to influence agendas, set priorities and inform programme design.
For an L/NNGO, accessing funds through an established INGO or UN partner can be quicker and less cumbersome than directly from a donor government.	L/NNGOs often had to work with multiple INGOs and UN agencies in order to sustain their organisations and operations; implying further administrative and compliance requirements.

<sup>15</sup> InterAction and Humanitarian Outcomes (2019). Op. Cit.

**Funding from the State:** In certain crisis-affected countries, humanitarian funding was also available from the government and its institutions for L/NNGOs. For example, in Colombia, L/NNGOs obtain funding for humanitarian and peace stabilisation activities through working with government institutions. In Ethiopia, government funding for L/NNGOs was available more so for their development activities. The Ethiopian Red Cross Society (ERCS) did receive financial support from the authorities for their ambulance service and to cover some core costs (see case studies).

Other humanitarian funding sources for L/NNGOs include **pooled funds** (see section 5.3) and **domestic mobilization** (see section 5.4).

### Factors that inform decision-making on financing local and national actors

According to discussions with international actors (donors, UN agencies, pooled funds and INGOs), the following factors have influenced decisions on whether to provide financing (often as an implementing partner) to L/NNGOs. These factors were found to be common across the three countries studied:

- Proven field experience
- Previous experience as a partner for INGOs, pooled fund or UN agencies
- Knowledge of the local context
- Local presence and access
- Capacity to move into new areas
- Availability of appropriate human resources
- Budget expediency and previous and proven experience in administrative management
- Official registration in-country<sup>16</sup>

In addition to the factors that have informed decisions as to whether or not to provide humanitarian financing to an L/NNGO, the research has identified a significant number of barriers that hinder the ability of L/NNGOs to access direct or “direct as possible” humanitarian funding as highlighted in the table below.

**Table 6: Barriers for accessing direct funding for L/NNGOs**

Barrier	Description
Operational history	When crises arise, as seen in Ukraine in 2014, newly-created local humanitarian organisations are unable to provide evidence of reliable operational implementation, particularly when compared to international actors.
Financial and management capacities	The absence of formal governance, management and financial systems and structures has hindered the ability of L/NNGOs to be able to meet the due diligence requirements of international funders and/or provide assurances of organisational ability to manage finances in a transparent and accountable manner. Stakeholders report that the main barrier with regard to due diligence is the time required to complete the process combined with the different due diligence criteria applied by different international actors.

<sup>16</sup> In all three countries, L/NNGOs are required to register with the authorities. In Ukraine, L/NNGOs are also required to have accreditation to work in non-government-controlled areas (NGCA) if they are to directly implement activities and/or be an implementing partner.

Grant management	To an extent linked to the above point, due to lack of longevity, and having been placed in the role of implementing partner as opposed to lead grantee, L/NNGOs have limited experience in direct grant management.
Donor priorities	Some donor government decisions are influenced by strategic direction from their capital cities and therefore focus financial support on these specific areas. INGOs and UN agencies also have biases towards their areas of sectorial speciality.
Donor restrictions	Some donor governments do not fund local organisations directly or have compliance criteria that are almost impossible for L/NNGOs to meet.
Disbursement cycles	Inflexible payment cycles of some international actors where the last disbursement is made once activities are completed and the final report submitted and accepted necessitates L/NNGOs having funding up-front to finance activities.
Access to information	L/NNGOs reported lacking information as to how to access funding from UN funding mechanisms and other pooled funds (e.g. Start Fund).
Administrative costs and overheads	International actors have different interpretations on the administrative and overhead costs directly linked to an operation. There are many different interpretations, often resulting in L/NNGOs not receiving sufficient funding to cover their overheads. Indeed, in some cases no administrative or overhead costs are covered.
Political barriers	Lack of political will by the national government for an international call for support might limit some donors' willingness to fund L/NNGO humanitarian action. This was seen in Colombia including the recent Venezuela migration/refugee crisis. In recent years, Colombia avoided launching a Consolidated Appeal.
Regulatory barriers	As explained further below, both domestic and donor regulatory barriers restrict funding to L/NNGOs.
Human resources	Many L/NNGOs lack the financial sustainability to retain experienced staff particularly between funding contracts. In addition, there can be competition with the private sector for some roles (e.g. engineers or doctors).
Restricted access to international actors	Although many donors conduct field missions or send initial rapid response teams to affected locations at times of crisis, many donor governments (and INGOs and UN agencies to a lesser extent) tend to base themselves in capital cities thereby limiting access and networking opportunities of L/NNGOs who have field-based structures.
Inclusion in inter-agency coordination fora	A number of L/NNGOs find it difficult to engage or be formally included in inter-agency coordination fora, such as the clusters set-up. Reasons for this can include language barriers; capacity restrictions, and lack of familiarity with humanitarian coordination systems.

Some stakeholders indicated that global funding trends for crisis-affected countries were impacting on humanitarian funding for L/NNGOs and all actors. In Ukraine it was noted that a number of donors are slowly reducing their humanitarian funding, partly due to competing

global commitments but also linked to the transition away from humanitarian activities and into development. This approach was also seen in Colombia. L/NNGOs struggled to understand these changes in funding architecture and shifts in availability of financing when the humanitarian needs on the ground remained high.

A number of stakeholders highlighted that there were some sectors for which it will always be difficult for L/NNGOs to access direct financing—not linked to the financing itself but rather to the activity. This was noted in relation to protection, particularly child protection, where also finding L/NNGOs with the right human resources skillset for such work was difficult. Here, the need for those with experience that bridges the legal/social services divide was lacking (often the case in conflict-affected countries).

In addition, some L/NNGOs struggled with maintaining the relevant human resources to implement humanitarian responses, a challenge seen in protracted conflict situations where competition for skilled human resources is often high and funding was intermittent.<sup>17</sup>

### Perceived risks and advantages of increasing direct funding for local and national responders

**Perceived risks:** Recent research has identified a number of risks faced in partnerships between local and international actors as follows:<sup>18</sup>

- Security risk: Physical risk to individuals and assets from acts of war, violence and crime.
- Fiduciary risk: The risk that money or materials are not used for intended purposes (i.e. fraud, theft, corruption).
- Legal/compliance risk: The risk that laws and relevant regulations are violated by the organisation or associated personnel.
- Operational risk: The risk of technical or human error, or capacity deficits, leading to operational failure/inability to achieve objectives. Includes financial risk (the risk of unexpected fiscal outcomes or being unable to finance activities) as distinct from fiduciary risk.
- Information risk: The risk of confidentiality breaches or data loss/theft.
- Reputational risk: Damage to the organisation's image and reputation that results in future harm or losses.
- Ethical risk: The risk of harm caused by unethical behaviour, including sexual misconduct and exploitation, inadequate duty of care, or insufficient consideration of humanitarian principles.

Of the above identified risks, stakeholders interviewed emphasised that the risks they perceived in relation to providing direct funding to L/NNGOs were mainly **fiduciary and legal/compliance risks**, as these are the risks most closely linked to the provision of financing. Whilst there were some well-reported examples of these risks taking place, they were not associated only with L/NNGOs but also with international actors. The ability of L/NNGOs to meet donor government due diligence requirements is an oft-cited reason for the continued provision of humanitarian financing to international actors and is discussed further below in section 5.2.

<sup>17</sup> British Red Cross and ICRC (November 2018). The Case for Complementarity—Working together within the International Red Cross and Red Crescent Movement in armed conflict and other situations of violence: <https://reliefweb.int/report/world/case-complementarity-working-together-within-international-red-cross-and-red-crescent>

<sup>18</sup> InterAction and Humanitarian Outcomes (2019). Op. Cit.

**Ethical and reputational risks** were also perceived to a lesser extent as possible risks of direct funding; more so the risk that L/NNGO behaviour, if inappropriate, would reflect badly on their donor or international partner. Donor governments reported concerns that smaller actors (which tend to be L/NNGOs) are less likely to have firmly embedded institutional processes in place to manage these risks. Although not a risk per se, the ability of L/NNGOs to deliver humanitarian assistance at scale varied from context to context and was also linked to the outcomes that responses are aiming to achieve.

According to donors, in a crisis situation, time may be insufficient to build quality relationships, or assess and strengthen the capacities of local or new actors; and therefore, the risks are greater than the benefits.<sup>19</sup> This has resulted in a continuation of financial support to larger, often international actors such as the UN, RCM and INGOs (see mitigating risks below). This has largely been the case in Ethiopia in relation to the recent increase in conflict and IDP displacement (see case study).

**Perceived advantages:** The advantages of funding directly overlap with the above listed factors of decision-making on L/NNGO funding, notably;

- L/NNGOs proximity, acceptance and access to local communities;
- L/NNGOs ability to identify humanitarian needs;
- L/NNGOs know-how and understanding of local cultures and contexts;
- The potential for sustainability of L/NNGOs activities over time;
- The ability of L/NNGOs to react and mobilise quickly;
- The potential cost-savings of L/NNGOs operations compared to INGOs and UN agencies.

This last advantage was the recognition that L/NNGOs will save money by cutting the higher costs of delivery and transaction costs of INGOs and UN agencies. For example, research on humanitarian surge found that it costs two-thirds less by deploying national rather than global staff.<sup>20</sup> Although cost savings at the expense of safety and security and staff was cautioned against.

### Mitigating risks related to funding for local and national actors

Risk management for humanitarian response traditionally comes in the form of intensifying financial scrutiny, legal constraints, and punitive repercussions for losses in what are highly volatile and high-risk environments<sup>21</sup>. Recent research has challenged the effectiveness of these techniques and their tendency to complicate and disincentivise partnering, resulting in greater risks, hindrances and inefficiencies for humanitarian responses.<sup>22</sup> Measures identified by this research that have been adopted to mitigate risks associated of funding L/NNGOs include:

**Capacity strengthening** has been seen as key element of risk management as it enables the establishment of trust and addresses some of the concerns of the different stakeholders as they relate to misuse of funds and lack of accountability.<sup>23</sup> Financial management capacity support including accounting, compliance, and procurement has been deemed essential by L/NNGOs

<sup>19</sup> Patel, S. & Van Brabant, K. (2017). The Start Fund, Start Network and Localisation Global Mentoring Initiative. Start Network. Page 10. <https://start-network.app.box.com/s/3hs09ryakami7n8hjliaruaaw9ycir4>, Page 17.

<sup>20</sup> Start Network (2018). The Future of Humanitarian Surge, p. 26: <https://start-network.app.box.com/s/xzdkmpk32biai93cm4izu5n9vjwi59fmm>

<sup>21</sup> InterAction and Humanitarian Outcome (2019). Op. Cit. P. 4.

<sup>22</sup> Ibid. Page 1.

<sup>23</sup> Grand Bargain Localisation Workstream Demonstrator Country Field Mission to Iraq 18-22 November 2018. Point 29. [http://media.ifrc.org/grand\\_bargain\\_localisation/wp-content/uploads/sites/12/2019/02/GB-Localisation-Workstream-Mission-to-Iraq-Report-Final-1-1.pdf](http://media.ifrc.org/grand_bargain_localisation/wp-content/uploads/sites/12/2019/02/GB-Localisation-Workstream-Mission-to-Iraq-Report-Final-1-1.pdf)





*L/NGO Proliska, Ukraine, humanitarian activities for displaced persons; © Proliska Ukraine*

themselves for partnerships with international actors.<sup>24</sup> A study in South Sudan and Somalia found that capacity strengthening has not changed the power dynamics between international actors and L/NGOs and advocated for the “right kind” of capacity strengthening (i.e. blending training and mentoring)<sup>25</sup>. In the three countries, positive examples were seen where international actors have recognised the importance of capacity strengthening for L/NGOs, such as more longer-term partnerships of INGOs as seen in Ethiopia and Colombia. In Ethiopia, USAID’s Local Capacity Development project supported more than 100 development and humanitarian L/NGOs over five years until 2019 to strengthen their capacity (total budget of US\$21m), in addition to the Shifting the Power project that focused on strengthening L/NGOs capacity in humanitarian response (see Ethiopia case study).

**Shifting the partnership model from “police” to partner** was an important element cited. This meant that rather than having investigations triggered by specific allegations/complaints, regular collaborative audits were used to help build trust and diminish disincentives to reporting problems and irregularities that may arise.<sup>26</sup>

**Harmonising and simplifying due diligence requirements.** An obstacle mentioned above was the inability of L/NGOs to meet the due diligence requirements of their international partners. Although progress has been limited, solutions are being tested and launched to simplify due diligence requirements. One solution has been seen in the Syrian response, where INGOs and UN agencies have reportedly adopted a common assessment tool for local partners.<sup>27</sup> Another response from UNHCR, UNICEF and WFP has been to jointly create the UN Partner Portal in

<sup>24</sup> Christian Aid, CARE, Tearfund, ActionAid, CAFOD, Oxfam (2019) Accelerating Localisation through Partnerships: Recommendations for operational practices that strengthen the leadership of national and local actors in partnership-based humanitarian action: <https://www.christianaid.org.uk/sites/default/files/2019-02/Accelerating-localisation-research-summary-global.pdf>

<sup>25</sup> Majid, S & Abdirahman, K & Poole, L & Willitts-King, B (2018). Funding to local humanitarian actors—evidence from Somalia and South Sudan: <https://www.odi.org/sites/odi.org.uk/files/resource-documents/12459.pdf>

<sup>26</sup> Ibid.

<sup>27</sup> Ibid.

2018 to “reduce duplication and management costs and enhance partnerships with local and national actors”.<sup>28</sup> Another example can be seen with the Start Fund with its current piloting of a tiered due diligence model designed to provide funding to L/NNGOs by ensuring their ability to meet due diligence requirements and strengthening their capacity where required. The system will allow for the strengthening of organisational capacity for those that want to move from one tier to the next rather than a simple “pass/fail”, with the capacity strengthening model running alongside the tiered due diligence framework.

**Contributing to overhead costs of L/NNGOs.** An issue seen in all three countries and reported globally is the challenge of L/NNGOs to remain financially stable and therefore retain key administrative staff that can support compliance and reporting aspects of funding. Positive examples have been seen where international actors have recognised this aspect and provided financial support. For example, IFRC’s agreement with ECHO in Colombia allows them to transfer a percentage of funding to the Colombian Red Cross to cover up to 4–5% of overhead costs (see case study). CBPFs allow up to 7% of budgets to be dedicated to programme support costs for the lead grantee (mainly UN agencies and INGOs and to a lesser extent L/NNGOs), but this is not systematically passed on to sub-grantees, who are mainly L/NNGOs (see section 5.3).

**Pre-screening of L/NNGOs.** A mitigation strategy adopted by pooled funds, such as the CBPFs, is pre-screening of organisations that would like future access to funds, thus allowing for rapid dispersing of funds when a crisis strikes. As described in section 5.3, the pre-screening requirements can be challenging to meet for some L/NNGOs. For access to RRF, some organisations had simplified pre-screening for their partners and members. For example, to access the ACT Alliance RRF it is sufficient to be a member of the Alliance and be in “good standing”.<sup>29</sup>

**Partnering with experienced L/NNGOs.** A mitigation strategy adopted by international actors was to partner with L/NNGOs that had a long and positive track record of working with international partners. For example, before an L/NNGO became a lead grantee for CPBF funding in Ethiopia, it was expected that they would have worked successfully as a sub-grantee with an INGO or a UN agency. This approach had the advantage of reducing the potential risks for international actors by working with “tested” partners. At the same time, it potentially limited the access to groups that have had limited experience or have been traditionally excluded from humanitarian response, such as women-led organisations.<sup>30</sup> Donor governments have recognised this challenge, as seen in USAID’s global New Partnership Initiative<sup>31</sup> that focuses on supporting under-utilized local actors and the Civil Society Support Programme 2 of several European governments (Ireland, Norway, Sweden, UK) that supports local actors in Ethiopia active on neglected humanitarian and development issues (see case study).

**Working with private sector, pooled funds, INGOs and UN agencies as intermediaries.** A mitigation strategy adopted by donor governments was to work with intermediaries to fund L/NNGOs. Intermediaries can also include private sector companies contracted to manage funding allocations on behalf of donors.<sup>32</sup> Although this had disadvantages from the point of view of L/NNGOs, for donors this was a preferred way of working and reduced their exposure to risk

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<sup>28</sup> <https://www.unpartnerportal.org/landing/>

<sup>29</sup> ACT Alliance (2017). Act Alliance Humanitarian Policy: <https://actalliance.org/wp-content/uploads/2017/08/ACT-Humanitarian-Policy-rev-2017.pdf>

<sup>30</sup> ActionAid (May 2017). Promoting localised, women-led approaches to humanitarian responses: <https://actionaid.org/publications/2017/promoting-localised-women-led-approaches-humanitarian-responses-briefing-note>

<sup>31</sup> USAID’s global New Partnership Initiative: <https://www.usaid.gov/npi>

<sup>32</sup> ICVA (September 2018). Localization examined: An ICVA Briefing Paper: <https://www.icvanetwork.org/resources/localization-examined-icva-briefing-paper>





L/NGO Terepeza Development Association, Ethiopia, emergency food distribution; © TDA Ethiopia

by effectively transferring risk to INGOs, UN agencies and pooled funds (who then it has been argued transfer the risks to L/NNGOs). It was also administratively far less of a burden for donor governments and from their perspective enabled them to support a much wider range and number of L/NNGOs (compared to if they were establishing individual partnerships with L/NNGOs).

## 5.2. Regulatory issues

With a focus on the three countries studied in this research, but also taking into account a global perspective, an understanding of the legal and policy factors that enable and restrict the provision and receipt of direct funding for L/NNGOs has been considered.

### Legal and policy enabling and restricting factors within affected countries

Within crisis-affected countries there are some regulatory factors which have helped to support localisation (although not necessarily more direct funding for L/NNGOs) as well as some factors which have hindered direct funding.

**Enabling factors:** In some countries, governments have indirectly promoted localisation by restricting the ability of international actors to implement humanitarian responses. Sudan provides an example where the government favours local and national actors. The Indonesian government's restrictions on foreign aid workers provides another example, as seen in the 2018 Sulawesi earthquake response. In spite of requesting international assistance, the Indonesian government introduced new rules in an effort to coordinate the offers of assistance from some 85 INGOs, emphasising the need to work through L/NNGOs and not to send expatriate staff. In other examples, governments do not always call for international assistance when disaster strikes as seen in the 2011 floods in South East Asia.<sup>33</sup> These approaches are

<sup>33</sup> <http://news.trust.org/item/20111223111500-1ms8u/> (ECHO did provide some \$7.17 million to support the response. Unlike the UN, ECHO does not need to wait for a request for international assistance in order to provide financial support).

questioned by some as their motivation is seen as less promotion of localisation and more so for political reasons.

Another enabling factor has been a legal and policy environment that allows L/NNGOs to operate freely and to accept foreign funding. The reform of the main civil society law in Ethiopia in 2019

was a positive development in this direction, allowing L/NNGOs much more freedom to operate and receive foreign funding, even if some concerns remain (see below and case study). It remains too early to see the impact of the newly reformed law, although Ethiopian stakeholders interviewed were positive that it will facilitate more active involvement and funding for L/NNGOs in humanitarian responses.

**Restricting factors:** Previous research has already indicated the prohibitive legal and policy environments that have restricted the ability of L/NNGOs to receive direct funding in crisis-affected countries, including: restrictions on receiving foreign funding; restrictions in carrying out humanitarian operations (in a given area or in general); cumbersome registration processes; excessive supervision and reporting requirements for L/NNGOs; lack of tax exemptions for L/NNGOs; and bureaucratic barriers for the entrance of humanitarian goods.<sup>34</sup> These restricting factors were found to be very contextual, changing from country to country, as seen for the three countries studied:

- **Colombia:** Restricting factors in Colombia relate mainly to the tax status of L/NNGOs that puts them at a disadvantage in terms of funds available for humanitarian operations as detailed in the case study. The current laws also treat L/NNGOs as if they are contractors rather than partners, when working on government funded projects.
- **Ethiopia:** The reformed civil society law introduced in March 2019 is seen as a significant improvement on the previous law as mentioned above. The main limitations identified to date in the new law are the broad investigative powers it gives to the oversight body, the Civil Society Organizations Agency, in addition to the burdensome auditing obligations for L/NNGOs.<sup>35</sup> To establish income-generation activities, the new law requires L/NNGOs to set up a separate business entity (as it did previously) effectively discouraging L/NNGOs from pursuing this fundraising possibility. The new law supersedes the eight directives implementing the previous law that are yet to be replaced creating some uncertainty as to how the law will be interpreted and implemented, according to stakeholders in Ethiopia.
- **Ukraine:** There are no barriers which restrict the receipt of funding for humanitarian operations from a legal or policy perspective for registered L/NNGOs. A restriction that could limit humanitarian funding is the requirement for L/NNGOs to hold a bank account outside the non-government-controlled area (NGCA), particularly important for L/NNGOs that operate in the NGCA. In Ukraine, the laws allow income-generation activities for L/NNGOs.

### Legal and policy enabling and restricting factors of donor countries

A review by this research of the largest eight humanitarian donor government laws and policies<sup>36</sup> with regard to direct funding of L/NNGOs indicates that only the EU has a legal restriction

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<sup>34</sup> <https://media.ifrc.org/ifrc/what-we-do/disaster-law/>

<sup>35</sup> UN Human Rights (April 2019), Ethiopia: UN experts commend civil society law reforms, but concerns remain. <https://reliefweb.int/report/ethiopia/ethiopia-un-experts-commend-civil-society-law-reforms-concerns-remain>

<sup>36</sup> Funding for 2019 from top donors globally: <https://fts.unocha.org/>



to directly fund L/NNGOs for humanitarian activities.<sup>37</sup> The main restrictions seen for donor governments were mainly policy choices as explained below. Nevertheless, donor governments have made progress in adapting their policies to enable more direct funding for L/NNGOs. The full analysis of the eight humanitarian donor government laws and policies is found at annex 1.

### Enabling factors

The 2019 Grand Bargain Independent Report highlighted that there has been a “*normative shift towards more support and more funding for local and national responders*”<sup>38</sup> implying that policies and practices of donor governments (and other signatories—UN agencies, RCM and INGOs) are changing positively in this direction.

A key policy-related enabling factor for donor countries has been the commitments made in relation to the Grand Bargain. As detailed in annex 1, all of the eight donor governments reviewed have reported that since 2016 they have increased their direct funding to L/NNGOs and/or have adapted their policies to facilitate greater direct funding (or are in the process of doing so). Examples of these enabling policies include:

- Policy changes to directly fund L/NNGOs (Canada); other governments restated they were already doing so (Germany, Switzerland, USA).
- Policy changes that maintained or increased funding to CBPFs and other pooled funds (Denmark, Canada, Germany, Sweden, Switzerland, UK, USA).
- Sweden plans to identify one agreement modality through which it can directly fund local and national responders.

Even the EU, with the legal barrier in place, has committed itself to a series of strategic investments in “*system-transforming initiatives, which are driving the localisation process*”. These include projects led by CAFOD to support capacity strengthening and financing of the NEAR network and projects led by the IFRC Secretariat and Christian Aid to promote system-level reform (including the financing of this research).<sup>39</sup>

Some donors have more explicit policies aiming to support the localisation agenda, although not always with a direct link to the provision of financing for L/NNGOs. For example, the UK Department for International Development (DFID) 2017 Humanitarian Reform Policy is clear about the UK government’s objective of building local capacity (including that of civil society organisations (CSOs)) to cope with and respond to disasters (although not specifically focused on building L/NNGO capacity), but does not focus on the provision of direct humanitarian financing.<sup>40</sup>

As mentioned above as a strategy to mitigate risks, many donor governments, INGOs and UN agencies have placed increasing emphasis on strengthening the capacity of L/NNGOs to lead in humanitarian response. Various projects have supported this aim including: the DFID-fund-

<sup>37</sup> The European Council’s regulation concerning humanitarian aid states in Article 7(a) that to receive funding an organisation must “*be non-profit-making autonomous organizations in a Member State of the [European] Community*”. European Council Regulation (EC) No 1257/96 of 20 June 1996 concerning humanitarian aid <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31996R1257:EN:HTML>

<sup>38</sup> HPG/ODI (2019), Op. Cit. p. 31.

<sup>39</sup> ECHO-funded projects include: IFRC-led “How to Go Local: Delivering on the Grand Bargain”; Joint CAFOD and NEAR Network project to establish emergency response fund for the latter; Christian Aid’s leading a Start Network consortium project “Accelerating Localisation through Partnerships programme”. Metcalfe-Hough, V & Poole, L & Bailey, S & Belanger, J (2018). Grand Bargain annual independent report 2018. HPG/ODI. [https://www.agendaforhumanity.org/sites/default/files/resources/2018/Jun/Grand%20Bargain%20annual%20independent%20report%202018\\_full.pdf](https://www.agendaforhumanity.org/sites/default/files/resources/2018/Jun/Grand%20Bargain%20annual%20independent%20report%202018_full.pdf)

<sup>40</sup> DFID (September 2017). Saving lives, building resilience, reforming the system: the UK Government’s Humanitarian Reform Policy [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/659965/UK-Humanitarian-Reform-Policy1.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/659965/UK-Humanitarian-Reform-Policy1.pdf)



ed Shifting the Power project (2015-2018), the ECHO-funded Accelerating Localisation Through Partnerships programme (2017-2019); Oxfam's Empowering Local and National Humanitarian Actors (ELNHA) project (2016-2018); and Mercy Corp's Investing in Syrian Humanitarian Action project.<sup>41</sup>

### Restricting factors

The main restricting factors in place in donor countries were policy-related and not legal. These restricting policy factors were often based on the practical challenges of scaling up direct funding to L/NNGOs and the perceived or real risk of compliance issues.

**Established relationships between donors and INGOs and UN agencies:** Over the years, donor governments have established long-term relationships with INGOs and UN agencies which has become a preferred way of working; Some of these organisations are pre-selected by donors in order to access rapid response emergency funding, for example DFID's Rapid Response Facility mechanism (see annex 1). However, from the perspective of local actors, *"long-standing dynamics and relationships make it difficult for them to challenge the status quo, and international agencies are seen to be in the driving seat when it comes to setting agendas due to their size and existing relationships with donors"*.<sup>42</sup>

From the donor perspective, their preference to work through and with INGOs, UN agencies and pooled funds is due to various reasons including; the high transaction costs associated with establishing new relations in a given country compared to the ease of working with pre-vetted INGOs and UN agencies that are present globally; the transfer of risk to INGOs and UN agencies who manage "light-touch" due diligence assessments at country level for L/NNGOs and/or work with their pre-existing L/NNGO partners; and the perception that L/NNGOs do not always have the capacity for large-scale or rapid humanitarian response or may not be the most appropriate actor for the needs identified (for example, protection needs).

On this last point, donor governments stressed that their financing decisions are based on who is best placed to carry out the humanitarian response needed. This may mean that some financing is directed purely towards international actors—the International Committee of the Red Cross' (ICRC) prevention and protection activities and International Organization for Migration's (IOM) mandate with migrants were examples provided.

**Due diligence requirements:** An obstacle mentioned above was the inability of L/NNGOs to meet the due diligence requirements of their international partners (donor governments but also INGOs, UN agencies and pooled funds) with L/NNGOs reporting carrying out multiple or similar due diligence exercises for different partners. Of note, there is a specific Grand Bargain commitment (4.5) on reducing donor assessment and oversight, on which the 2019 Grand Bargain report indicated *"there is no evidence of any substantive progress in reducing the reporting burden...rather an increase"*.<sup>43</sup> As described above, several initiatives are underway to reduce this burden on L/NNGOs.

Counter-terror legislation: These measures create significant barriers to enabling partnerships with local actors in many countries. In addition to creating complications for INGOs and UN agen-

<sup>41</sup> Further information; <https://startnetwork.org/start-engage/shifting-the-power>; <https://www.christianaid.org.uk/about-us/programmes/accelerating-localisation-through-partnerships>; <https://www.oxfamnovib.nl/donors-partners/about-oxfam/projects-and-programs/elaha.html>

<sup>42</sup> Oxfam (2018). Money Talks. A synthesis report assessing humanitarian funding flows to local actors in Bangladesh and Uganda. Oxfam/Development Initiatives. Page 11. [https://www-cdn.oxfam.org/s3fs-public/file\\_attachments/rr-money-talks-humanitarian-funding-localization-230318-en\\_0.pdf](https://www-cdn.oxfam.org/s3fs-public/file_attachments/rr-money-talks-humanitarian-funding-localization-230318-en_0.pdf)

<sup>43</sup> HPG/ODI (2019) Op. Cit. Page 39.

cies, this is even more complicated for L/NNGOs, which not only operate in, but are also part of, societies where there are 'terror' groups present.<sup>44</sup> Anti-money laundering regulations are also putting increasing pressure on both international and local actors.<sup>45</sup> This has seen implications in terms of the restriction or withdrawal of funding for L/NNGOs and barriers to implementation due to perceived risks associated with specific organisations or affected populations. For example, in Colombia, some donors have requested implementing partners to ensure that no aid reaches any former member of the armed group *Fuerzas Armadas Revolucionarias de Colombia* (FARC), including after their demobilisation (see case study).

Some donors, such as DFID, operate with a decentralised structure meaning that different approaches to fulfilling localisation commitments may be in place from one country to another.

Whilst donors may have criteria as to which organisations can/cannot be funded, those interviewed emphasised that these would apply to *all* partners and would not be based on whether an organisation was international, national or local.

### Development funds as possible alternatives for humanitarian funding

The availability of development funds as a possible alternative or supplement to humanitarian funding for L/NNGOs is still at a relatively early stage of implementation, as seen by the research carried out globally and in the three study countries.

As described in the Ethiopia case study, development funding to support L/NNGOs in their activities and institutional strengthening has indirectly supported their ability to carry out humanitarian activities. This funding often sustained the L/NNGOs over the long-term and between humanitarian funding. A number of embassies also provide direct financing to L/NNGO on issues such as democracy and human rights more so than for humanitarian activities.<sup>46</sup>

Colombia provides an example where funding has been increasingly directed towards to peace-building and transformation initiatives even if the country remains affected by both on-going armed conflict and natural disasters (see case study). As described in the case study, a major funding stream, the Colombia Peace Fund has been established that incorporates funding from the EU, UN, World Bank and donor governments through various trust funds (see section 5.3 and case study). Various project funding opportunities are available to L/NNGOs but these are mainly in peacebuilding/stabilisation, demobilisation and economic development.

The provision of multi-year funding for humanitarian response is seen as supporting the nexus between development and humanitarian action. However, very few examples were seen in the three countries where multi-year funding was available to L/NNGOs, with the exception of some longer-term partnerships between INGOs and L/NNGOs as described above. Although donor governments have reported globally in 2019 that they are moving quickly to multi-year funding for humanitarian response, this is yet to be seen by most INGOs and UN agencies, and even less so by L/NNGOs.<sup>47</sup>

<sup>44</sup> Patel, S. & Van Brabant, K. (2017) Op. Cit.; The New Humanitarian (2019), Aid groups worry new US anti-terror law could leave them liable, 12 March 2019, <https://www.thenewhumanitarian.org/analysis/2019/03/12/aid-groups-worry-new-us-anti-terror-law-could-leave-them-liable>

<sup>45</sup> Majid, S & Abdirahman, K & Poole, L & Willitts-King, B (2018). Funding to local humanitarian actors- Somalia case study. ODI/HPG. Page 11. <https://www.odi.org/sites/odi.org.uk/files/resource-documents/12468.pdf>

<sup>46</sup> For example, the British Embassies International Programme which publishes calls for proposals from local organisations covering different topics depending upon context.

<sup>47</sup> HPG/ODI (2019) Op. Cit. Page 50.



*L/NGO Alianza por la Solidaridad Colombia, supporting affected persons of the conflict; © Alianza por la Solidaridad Colombia*

### **International agency support to local actors to address regulatory issues**

International actors have provided support to L/NGOs to address regulatory issues. However, several of the key issues, such as the preference of donor governments to work with international intermediaries and their due diligence requirements can mainly be addressed by the donors themselves. International actors are aware of these issues and have started to address them, notably as part of meeting their Grand Bargain commitments.

In terms of addressing regulatory issues in crisis-affected countries, the introduction of the newly revised civil society law in 2019 in Ethiopia is an example where international actors supported L/NGOs in their influencing efforts with the Ethiopian authorities to adopt the more progressive law. The IFRC and the respective National Societies have also carried out studies on the obstacles and proposed solutions for disaster management law in both Colombia and Ethiopia (see case studies).

Indirectly, the capacity building activities and projects of the international actors as described above have supported the L/NGOs in addressing some of the policy issues faced in dealing with direct humanitarian funding, such as administrative, financial and operational capacity.

## **5.3. Pooled funds**

### **CBPFs**

UN OCHA's CBPFs have been established to support the humanitarian projects of the best placed partners whether they are local, national or international. As of September 2019, OCHA is managing 18 CBPFs.<sup>48</sup> As described above, contributing to CBPFs is increasingly seen by donors as a way of supporting localisation and more direct financing for L/NGOs (though, of course, the CBPFs themselves are intermediaries between the donor and the recipients). In 2018 the CBPFs dispersed US\$208 million (25% of their total) directly to L/NGOs up from US\$62 million in

<sup>48</sup> <https://pfb.unocha.org/>



2014.<sup>49</sup> However, CBPFs remain a small component of overall humanitarian funding—only 2.8% of total funds in 2018.<sup>50</sup>

In the three countries studied, the CBPFs are at different stages; in Ethiopia, the CBPF has been operational since 2006; in Colombia, the CBPF was closed in 2017; in Ukraine, the CBPF has been established in February 2019. The following table provides an overview of these three CBPFs (further details are found in the case studies):

**Table 7: Description of CBPFs in the three countries**

Colombia	Ethiopia	Ukraine
The Emergency Relief Fund (ERF) ran from 2010-2017 and funded INGOs and L/NNGOs (UN agencies were excluded). In 2010, L/NNGOs received 46% of the funds, dropping to 9% in 2013. In the last year of the ERF, 2017, L/NNGOs received 48% of the funds.	Since 2006, the Ethiopia Humanitarian Fund (EHF) has allocated US\$538.8m to 884 projects through 59 partners. However, only three of these partners receiving direct funding have been L/NNGOs. <sup>51</sup> In 2018, 3% of funds went to L/NNGOs (one L/NNGO). <sup>52</sup>	The Ukraine Humanitarian Fund (UHF) was launched in February 2019.
The ERF closed on the basis of the 2016 Peace agreement although this decision was not supported by L/NNGOs and other actors who saw the ERF as an important direct funding channel for them.	The EHF has been active in promoting the fund to L/NNGOs and aims to have at least seven L/NNGOs qualify for EHF grants by 2020.	OCHA reached out to over 100 partners on both sides of the contact line to support them in becoming eligible for funding.
		To date, the UHF has raised US\$3.2m of the US\$10m target. <sup>53</sup>
		The first funding distribution is planned for late 2019.

A 2019 study by OCHA and Norwegian Refugee Council (NRC) found that the CBPFs have played a significant role in providing more funding to L/NNGOs.<sup>54</sup> In Colombia, the ERF was seen as positively encouraging L/NNGOs in their humanitarian action, and for some it provided an initial impetus for starting humanitarian activities. In Ethiopia, the EHF has funded only three L/NNGOs directly although some 20 have been sub-grantees for UN/INGO lead grantees. The main obstacle for L/NNGOs in qualifying directly for EHF funds is the requirement for a foreign currency bank account which most L/NNGOs are not allowed to have. In both Ethiopia and Ukraine, L/NNGOs were represented on the CBPFs advisory boards, a practice encouraged for all CBPFs by the OHCA/NRC study.<sup>55</sup>

Several limitations that impact CBPFs' ability to support localisation were identified:

<sup>49</sup> OCHA, Global Humanitarian Overview 2019. Mid-year status report, June 2019. [https://www.humanitarian-response.info/sites/www.humanitarianresponse.info/files/documents/files/gho\\_statusreport\\_20\\_june\\_2019\\_final\\_en.pdf](https://www.humanitarian-response.info/sites/www.humanitarianresponse.info/files/documents/files/gho_statusreport_20_june_2019_final_en.pdf)

<sup>50</sup> US\$836m out of US\$28.9 billion humanitarian funding in 2018: [http://devinit.org/wp-content/uploads/2019/06/Factsheet\\_key-trends-in-global-humanitarian-assistance\\_2019.pdf](http://devinit.org/wp-content/uploads/2019/06/Factsheet_key-trends-in-global-humanitarian-assistance_2019.pdf); and [https://reliefweb.int/sites/reliefweb.int/files/resources/CBPF%20Factsheet%20March%202017\\_EN.pdf](https://reliefweb.int/sites/reliefweb.int/files/resources/CBPF%20Factsheet%20March%202017_EN.pdf)

<sup>51</sup> <https://www.unocha.org/ethiopia/about-ehf>

<sup>52</sup> OCHA (2019): Ethiopia Humanitarian Fund, Annual Report 2018. [https://www.unocha.org/sites/unocha/files/Ethiopia%20HF%20Annual%20Report%202018\\_0.pdf](https://www.unocha.org/sites/unocha/files/Ethiopia%20HF%20Annual%20Report%202018_0.pdf)

<sup>53</sup> <https://reliefweb.int/report/ukraine/ocha-ukraine-situation-report-25-jul-2019-enruuk-0>

<sup>54</sup> Els, C., NRC/OCHA (July 2019). Country-based pooled funds: The NGO perspective <https://www.nrc.no/resources/reports/country-based-pooled-funds-the-ngo-perspective/>

<sup>55</sup> Ibid.

**The lack of multi-year funding** has meant that most funded projects run for eight-nine months on average. The OCHA/NRC study found that most stakeholders felt that projects with a duration of less than one year are not desirable for cost-effectiveness reasons.<sup>56</sup> The CBPFs are dependent upon multi-year funding from donors, which currently only Switzerland and the UK provide. The Democratic Republic of the Congo's CBPF is the only one which systematically provides funding over a 24-month period even though there are no multi-year pledges to the fund.<sup>57</sup>

**Unfulfilled funding needs:** Although the CBPFs are a preferred funding mechanism for donors, they remain a small part of overall funding and can be underfunded as is the case currently with the UHF. Over time, the CPBFs have generally responded to new humanitarian crises or spikes. With the protracted nature of many of today's crises, CBPFs are not seen as a sustainable or long-term source of funding for any humanitarian actor.

**Flexibility of budgeting rules:** Currently under the budgeting rules up to 22% of CBPF funding can be used in a flexible manner, including 15% budget flexibility and 7% project support costs. As mentioned above, the lead grantees were not required to pass on the 7% of project support costs to sub-grantees, often L/NNGOs. Further, the OCHA/NRC study identified a lack of budget flexibility for staff costs and the need for prior approval to create budget lines that was time-consuming and hindered the effective use of funds.<sup>58</sup>

**Operational inefficiencies:** According to a 2017 NRC study, the sub-granting process takes time and results in heavy transaction costs before the money is received by applicants.<sup>59</sup> While efforts have been made to address disbursement rates, some of the UN policies and administrative systems can limit flexibility and lead to bureaucratic delays, and challenge L/NNGO accessibility. Other bureaucratic issues affecting fund availability for L/NNGOs reported by a 2017 global assessment included long delays in auditing CBPF funded projects, misaligned funding cycles between donors and recipients, limited accessibility in terms of language and online applications, and over complicated CBPF guidelines.<sup>60</sup>

**Cumbersome application processes and oversight arrangements.** In order to access CBPFs, NGOs must first undergo a due diligence process with OCHA's Humanitarian Financing Unit, followed by an in-country partner capacity assessment which can be demanding processes leading to high transaction costs for many L/NNGOs affecting accessibility.<sup>61</sup> A 2018 global study found that most local partners do not qualify to receive direct CBPF funding due to a lack of strong financial management and reporting systems. They require direct oversight by CBPF implementing partners, which can stretch CBPF partners' capacity "to the point of vulnerability".<sup>62</sup>

## Other pooled funds

**The Start Fund** is focusing on supporting forecasting and early action for impending crises<sup>63</sup> and is seen as one of the more innovative ways in which NGOs may receive humanitarian fi-

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<sup>56</sup> Ibid.

<sup>57</sup> Ibid.

<sup>58</sup> Ibid.

<sup>59</sup> Thomas, M. (2017). Understanding humanitarian funds. Going beyond country-based pooled funds. Norwegian Refugee Council. [https://www.nrc.no/globalassets/pdf/reports/pooled\\_funds\\_2017\\_16mar2017\\_web\\_v2.pdf](https://www.nrc.no/globalassets/pdf/reports/pooled_funds_2017_16mar2017_web_v2.pdf)

<sup>60</sup> Multilateral Organization Performance Assessment Network (MOPAN) (2015-2016), UNOCHA Institutional Assessment Report. Pages 14, 18, 77: <http://www.mopanonline.org/assessments/unocha2015-16/Mopan%20UN-OCHA%20report%20%5Binteractive%5D%20%5Bfinal%5D.pdf>

<sup>61</sup> Carter, Becky (2018). Country-based pooled funds for humanitarian financing. Institute of Development Studies. K4D/DFID. Page 11: [https://reliefweb.int/sites/reliefweb.int/files/resources/486\\_Humanitarian\\_Country\\_Based\\_Pooled\\_Funds.pdf](https://reliefweb.int/sites/reliefweb.int/files/resources/486_Humanitarian_Country_Based_Pooled_Funds.pdf)

<sup>62</sup> Ibid.

<sup>63</sup> <https://startnetwork.org/start-fund>

nancing. According to their 2018 annual report, at least 21% of the Start Fund expenditure was made to local and national partners in 2017/2018. However, in both Ethiopia and Colombia, all Start funding to date has gone to INGOs with possibly some L/NNGOs as implementing partners. One of the barriers for L/NNGOs in becoming a Start Fund member is reported to be the challenges in meeting their due diligence criteria. As discussed above, the Start Fund is piloting a tiered due diligence model combined with a capacity strengthening framework. In addition, the Start Fund is piloting NGO-managed country-level pooled funds in selected disaster and crisis-prone countries, with Bangladesh being the first pilot country launched in 2017.<sup>64</sup> In May 2019, 26 L/NNGOs became members and as of August 2019, the Bangladesh Start Fund reported disbursing 50% (£573,369) of funds to L/NNGOs for last the five alerts.<sup>65</sup>

**The DREF** was established by the IFRC in 1985 to provide immediate financial support to National Red Cross and Red Crescent Societies to respond to small, medium and large-scale emergencies as first responders. Funds for the DREF are sought through an annual appeal and are available to all 190 Red Cross/Crescent National Societies.<sup>66</sup> Assistance to National Societies can be provided through the DREF and, if requested, the IFRC will work with the National Society to launch an international Emergency Appeal.<sup>67</sup> In 2018, the Forecast-based Action funding mechanism was launched to fund the forecast-based Early Action Protocol; as of March 2019, 22 National Societies were currently implementing Forecast-based Action projects in various stages.<sup>68</sup> In 2018, 116 allocations for 92 operations (some US\$24m) were made directly to 61 National Societies working in their own countries.<sup>69</sup> The National Societies of Colombia and Ethiopia have both received DREF funding (see case studies).

**The National Society Investment Alliance (NSIA)** is a pooled funding mechanism for the RCM, providing flexible, multi-year financing and support for the development of Red Cross and Red Crescent National Societies, strengthening their capacity to deliver relevant and effective humanitarian services. A joint initiative of the IFRC and the ICRC, it prioritises National Societies in very high to medium risk humanitarian contexts ensuring services can be delivered wherever communities are vulnerable to armed conflict, violence, natural disasters and other humanitarian challenges. First allocations from the NSIA were made in May 2019 to 10 National Societies with the National Societies of both Colombia and Ukraine awarded funding<sup>70</sup> (see case studies).

**The Central Emergency Response Fund (CERF)** was launched in March 2006, providing both a grant facility and a loan facility in response to new emergencies. The CERF allocates one third of its funding to support humanitarian responses in underfunded emergencies. Allocations are made to UN agencies which can then create sub-grants for implementing partners. Research undertaken by Local2global in 2017 highlighted that grants to local and national responders ranged between 4 and 22%.<sup>71</sup> Within this, when looking from a cash grants perspective, only one of the seven UN agencies studied was close to providing at least 25% of the funding to L/NNGOs. However, this figure is altered when in-kind transfers are considered, with six of the seven agencies near to reaching the target.

<sup>64</sup> Abby Stoddard, Lydia Poole, Glyn Taylor and Barnaby Willitts-King with Shoaib Jillani and Alan Potter (2017). *Efficiency and Inefficiency in Humanitarian Financing*. Page 31.

<sup>65</sup> [https://www.humanitarianoutcomes.org/sites/default/files/publications/humanitarian\\_financing\\_efficiency\\_.pdf](https://www.humanitarianoutcomes.org/sites/default/files/publications/humanitarian_financing_efficiency_.pdf)

<sup>66</sup> <https://startnetwork.org/news-and-blogs/start-fund-bangladesh-makes-direct-award-local-ngo>; Presentation by Start Network at regional Localisation Conference in Jakarta, 2019.

<sup>67</sup> <https://media.ifrc.org/ifrc/dref/>

<sup>68</sup> 2018 Grand Bargain Annual Self-Reporting—IFRC. [https://interagencystandingcommittee.org/system/files/ifrc\\_grand\\_bargain\\_-\\_2018\\_self-report.pdf](https://interagencystandingcommittee.org/system/files/ifrc_grand_bargain_-_2018_self-report.pdf)

<sup>69</sup> 2019 Grand Bargain Annual Self-Reporting—IFRC, Op. Cit.

<sup>70</sup> IFRC (April 2019). Annual Report—DREF: <https://media.ifrc.org/ifrc/dref/>.

<sup>71</sup> <https://media.ifrc.org/ifrc/national-society-investment-alliance/>

<sup>71</sup> [https://www.local2global.info/wp-content/uploads/in\\_kind\\_vs\\_funding\\_28\\_11\\_2016.pdf](https://www.local2global.info/wp-content/uploads/in_kind_vs_funding_28_11_2016.pdf)



DFID's **HARP Facility** in Myanmar provides a positive example of flexibility and innovation in relation to funding national and local humanitarian organisations, providing financial support for capacity strengthening as well as service delivery, including on a multi-year basis.<sup>72</sup> This is also the first known instance of DFID using a commercial company, Crown Agents, to manage humanitarian financing.<sup>73</sup>

**Trust Funds** have been established by different international actors including the EU and the UN. The EU Trust Funds (EUTF) are multi-donor trust funds for emergency, post-emergency or thematic actions.<sup>74</sup> As detailed in the Colombia case study, an EUTF has been established in Colombia with limited funding available for L/NNGOs (US\$3.3m out of US\$133m total). Similarly, a UN Multi-Partner Trust Fund has been established in Colombia with 30% of funding intended for civil society (INGOs and L/NNGOs). The World Bank fund for peace and post-conflict in Colombia has no direct funding access for L/NNGOs (see case study).

### Barriers for local actors to access to pooled funds

The following barriers were identified for L/NNGO actors to access pooled funds:

- For CBPFs in general, the short-time limitation of funding and consequently project implementation, means that the funds are not a long-term source for financing. The Grand Bargain commitments recognise this limitation of short-term funding; positively Switzerland and the UK have started to provide multi-year funding for CBPFs as noted above.
- For the EHF, the requirement for a foreign currency bank account has effectively blocked many L/NNGOs from accessing EHF funds directly.
- For the Start Fund, a barrier to accessing funds was the eligibility requirements and their focus on funding INGOs as seen in Colombia and Ethiopia, and even in the country-level Bangladesh fund. Further, in Ethiopia where the Fund was active, L/NNGOs were largely not aware of the Fund and its membership requirements (on the contrary the EHF was well known amongst L/NNGOs benefiting from proactive outreach by the EHF).
- None of the pooled funds had separate funding streams for women-led and women-run organisations despite the emphasis placed on integrating women's empowerment across the Grand Bargain commitments.<sup>75</sup> Women-led and women-run L/NNGOs interviewed for this research commented on the absence of funding opportunities for their humanitarian activities.
- A centralized repository of information on humanitarian pooled funds does not seem to exist. Scattered information makes it challenging for L/NNGOs to understand the overall landscape, the different players, and the application procedures of the various pooled funds. For the different trust funds, such as the EUTFs, finding information related to the application process, what the funding criteria are and what kind of reporting may be required is challenging.<sup>76</sup>

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<sup>72</sup> <https://www.harpfacility.com/>

<sup>73</sup> Carter, Becky (2018). Op. Cit. Page 9.

<sup>74</sup> European Parliament Briefing / EU Trust Funds for external action (2015).

[http://www.europarl.europa.eu/RegData/etudes/BRIE/2015/572797/EPRS\\_BRI\(2015\)572797\\_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/BRIE/2015/572797/EPRS_BRI(2015)572797_EN.pdf)

<sup>75</sup> HPG/ODI (2019) Op. Cit. Page 25.

<sup>76</sup> Carter, Becky (2018). Op. Cit. Page 9.





Alem Bekele, an Ethiopian Red Cross volunteers tends Eucalyptus trees a part of income generating programme; © Yoshi Shimizu / IFRC

## 5.4. Domestic resource mobilization for humanitarian action

### Existing opportunities and threats to domestic resource mobilization

All stakeholders spoken to for this research emphasized that opportunities for L/NNGOs to raise funds for humanitarian action domestically are limited, although examples were seen in the three countries and elsewhere where domestic resource mobilization by L/NNGOs was carried out successfully (see case studies for further details):

- **Public fundraising:** raising funds from the public was successfully done by the ERCS who raised some US\$610,000 (18 million Ethiopian Birr) to support its humanitarian activities for IDPs in 2018. The Colombian Red Cross (CRC) also raises public funds in Colombia through a lottery.
- **Business support/corporate social responsibility:** In the three countries studied, there were limited examples seen of private sector support. One example seen was in Colombia, where a large retail group raised over US\$20,000 funds for victims of a 2017 landslide funding the CRC and other L/NNGOs.
- **Membership and volunteering:** some L/NNGOs reported generating income from membership contributions, notably in Ethiopia. For example, the Tigray Women's Association, reported that they collected US 35 cents (10 Ethiopian Birr) per person per year for membership fees from some 700,000 members, amounting to an annual income of some US\$238,000 (7m Ethiopian Birr). Examples were also provided from faith-based L/NNGOs in Ethiopia where they had collected funds and non-food items from their congregations. L/NNGOs in all three countries were also supported by citizens who volunteered their time to support humanitarian actions.
- **Crowdfunding:** Small amounts collected via the internet, social media and mobile phones on dedicated crowdfunding platforms have proven successful in Ukraine. It is estimated that over US\$5m has been raised in recent years on the main crowdfunding platform for various

causes, campaigns and organisations, although it is not known how much went to L/NNGOs for humanitarian response.

- **Income generation activities:** Some L/NNGOs reported raising funds through income generation activities such as renting out their training or meeting room facilities (e.g. ERCS). Income generation has also been raised as an area with potential for resource mobilization by L/NNGOs in other countries.<sup>77</sup>

Domestic fundraising opportunities in conflict environments tend to be limited as witnessed in Ukraine although even some options remained possible as detailed in the case study. For example, local organisations were able to apply for tenders or social contract procedures run by local authorities. A similar situation can be seen in Colombia. Although not directly providing humanitarian assistance, the provision of social services in normal times by L/NNGOs with local government funding may better equip them to provide stronger humanitarian responses when needed.

### Ways in which international actors can support domestic resource mobilization

Similar to the capacity strengthening support that international actors can provide in order to help L/NNGOs meet the due diligence criteria of international actors, support for domestic resource mobilization is an area in which capacity building and knowledge could also be provided. However, experienced L/NNGOs in domestic resource mobilization could be even more appropriate to provide capacity strengthening to other less experienced L/NNGOs. For example, in Ethiopia, the ERCS would be well placed to provide such support to other L/NNGOs.

The RCM has been seen to provide this form of support to its National Societies with the example of the recently established NSIA (mentioned above in section 5.3) being one source of funding which can be used to support local resource mobilization and reduce reliance on international funding; both the National Societies of Colombia and Ukraine will benefit from this aspect.

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<sup>77</sup> In research carried out in Nepal, Myanmar, South Sudan and Nigeria, see: Christian Aid, CARE, Tearfund, ActionAid, CAFOD, Oxfam (2019), Op. Cit.



### Direct financing for L/NNGOs in Syria

In the eight years of the Syrian conflict, more than six million Syrians have been displaced internally, and another five million have spilled into surrounding countries. Humanitarian workers face the challenge of not only delivering aid to those displaced throughout Syria, but to the nearly three million people that live in hard-to-reach or besieged areas.<sup>78</sup>

The conflict in Syria has made it extremely difficult for INGOs and UN agencies to access the country safely and operate within the borders. The result of this has been that most international actors operate remotely from Lebanon, Jordan, Iraq and Turkey; depending on local organisations to deliver the humanitarian services inside Syria. International actors are also present in the areas controlled by Damascus<sup>79</sup>. According to OCHA, between 600 and 700 L/NNGOs have been established since the conflict began in 2011 with around a fifth of them active in Syria itself. Many are either unregistered or registered with the local authorities in opposition areas or in neighbouring countries such as Turkey and Lebanon.<sup>80</sup> A 2018 report shows that although L/NNGOs are responsible for delivering 75% of the humanitarian assistance, they receive at most 0.9% of direct funding, and that figure could be as low as 0.2%.<sup>81</sup> In 2018, from the Syria Humanitarian Fund (SHF) L/NNGOs received only 6% (US\$2.3m) of direct SHF funding—which was granted to two L/NNGOs partners. Recognising this low participation, the SHF commented that *“The funding distribution mainly indicates the challenges faced by NGOs in obtaining government clearances before implementation of SHF projects”*.<sup>82</sup>

A 2018 organisational capacity self-assessment of Syrian CSOs inside Syria and Turkey revealed that the biggest challenge they faced was accessing funding, limiting their ability to forecast future programming needs. A 2016 study found that Syrian L/NNGOs have difficulties in covering their basic costs in the sub-contracting and partnership agreements they have with international actors.<sup>83</sup>

The main critique to localisation comes from international actors expressing concerns about the capacity of local actors to scale up interventions, and about the political neutrality of local actors in time of conflict. The former argument may hold true in many instances and can be partially addressed with adequate training and capacity building, while the latter touches on the humanitarian principles of “neutrality” and needs some broader political reflection within a context of violence.<sup>84</sup>

<sup>78</sup> Building Markets (May 2018), “Enabling a local aid response in Syria: An Assessment of Syrian-led Organizations”: [https://www.alnap.org/system/files/content/resource/files/main/enabling\\_a\\_local\\_aid\\_response\\_in\\_syria.pdf](https://www.alnap.org/system/files/content/resource/files/main/enabling_a_local_aid_response_in_syria.pdf)

<sup>79</sup> Ibid.

<sup>80</sup> Svoboda, E & Pantuliano, S. (March 2015) International and local/diaspora actors in the Syria response. A diverging set of systems? HPG Working Paper, ODI: <https://www.odi.org/sites/odi.org.uk/files/odi-assets/publications-opinion-files/9523.pdf>

<sup>81</sup> Building Markets. Op. Cit.

<sup>82</sup> OCHA (2019), Syria Humanitarian Fund Annual Report 2018, p. 16. <https://www.unocha.org/sites/unocha/files/Syria%20HF%20Annual%20Report%202018.pdf>

<sup>83</sup> Els, Christian; Mansour, Kholoud; Carstensen, Nils. “Funding to national and local humanitarian actors in Syria: Between sub-contracting and partnerships” L2GP, May 2016. [https://www.local2global.info/wp-content/uploads/L2GP\\_funding\\_Syria\\_May\\_2016\\_ex\\_sum.pdf](https://www.local2global.info/wp-content/uploads/L2GP_funding_Syria_May_2016_ex_sum.pdf)

<sup>84</sup> Duclos, D., Ekzayez, A., Ghaddar, F., Checchi, F., & Blanchet, K. (2019). Localisation and cross-border assistance to deliver humanitarian health services in North-West Syria: a qualitative inquiry for The Lancet-AUB Commission on Syria. *Conflict and Health*, 13(1), 20. <https://conflictandhealth.biomedcentral.com/articles/10.1186/s13031-019-0207-z>



*Volunteers of the Ukrainian Red Cross Dnipropetrovsk branch hold psychosocial session for internally displaced families; © Nora Peter/IFRC*

## 6. Conclusions

This research focused on humanitarian financing solutions for local and national actors with the aim of producing critical background information to strengthen their access to financing. Access to humanitarian funding for L/NNGOs has slowly increased with all stakeholders making concerted efforts to change their approaches and policies in line with their Grand Bargain commitments.

**Direct funding from donor governments** for L/NNGOs without an intermediary builds mutual trust and respect, is cost-effective and readdresses power balances. But to date there is relatively little direct funding occurring. This type of funding deserves to be increased and encouraged, possibly learning from other sectors/areas such as development and institutional building. Compliance and administrative burdens can be mitigated with suggested actions found in the guidance note.

However, **barriers persist for direct funding to L/NNGOs** with some that will remain, notably the preference of donor governments to work through international intermediaries, which is still considered “direct as possible”. Therefore, actions are needed to ensure that when L/NNGOs receive funding through intermediaries they are also supported in their sustainability and capacity to respond to humanitarian crises. This will require a shift towards more humanitarian financing over a longer-period, less project-based, covering further overhead costs and capacity building—and better matched to cyclical and protracted crises.

**Pooled funds will remain a key funding source** for L/NNGOs and indications are that their role will increase. Pooled funds deserve a greater share of humanitarian funding while efforts are

needed to make them more accessible and orientated to L/NNGOs. Pooled funds need to encourage the sustainability of L/NNGOs through longer-term funding and support.

**The legal and regulatory environment** is overall favourable to direct humanitarian funding to L/NNGOs. Governments of crisis-affected countries need to ensure that L/NNGOs are able to operate freely and receive foreign funding without facing penalties or disadvantages. Donor governments, who are incrementally adapting their policies to support greater direct funding, need to accelerate this further, such as by finding consensus on reporting, risk assessments and compliance requirements for L/NNGOs.

**L/NNGOs will remain development and humanitarian actors** as many of their comparative INGOs are. L/NNGOs should find further synergies with their development activities, including funding and develop more diverse funding sources, including domestic resource mobilization. Considering all of the above, donors still need to be able to respond to crises as effectively as possible and their decisions will be driven by added value, comparative advantage and complementarity of all actors.

These conclusions are reflected in the action-focused points in the accompanying guidance note drafted jointly with this report (separate document) on how to strengthen access of local and national actors to greater humanitarian financing.



## Annex 1: Summary of donor government laws and policies on direct funding of L/NNGOs

Below is a summary of the largest eight humanitarian donor government laws and policies<sup>85</sup> with regard to direct funding of local and national actors. As previous studies have highlighted, counter-terrorism and anti-money laundering regulations of donor governments is an issue which can impact on funding L/NNGOs (or INGOs and UN agencies partnering with them), particularly those active in conflict areas.<sup>86</sup>

**Canada** does not have any legal barriers to directly fund local and national actors. Instead, all recipients must meet a number of minimum institutional and financial requirements. International humanitarian assistance requirements include compliance with international humanitarian protocols, codes of conduct and agreements (such as the Grand Bargain).<sup>87</sup> According to the 2018 Grand Bargain Self-Reporting assessment, Canada recently began directly funding national responders in the context of the Rohingya crisis response. This represented 0.2% of Canada's humanitarian assistance in 2017.<sup>88</sup> Nonetheless, Canada supports numerous humanitarian pooled funds such as the Emergency Disaster Assistance Fund (EDAF), which is administered by the Canadian Red Cross, and several CBPF.<sup>89</sup>

**The United Kingdom** has several mechanisms to respond to humanitarian emergencies. In rapid onset humanitarian emergencies or conflicts, DFID's immediate funding is likely to go through the multilateral system or to Rapid Response Facility (RRF) partners. RRF partners are pre-qualified NGOs that must pass a pre-selection process in order to be able to access this stream of funding. It should be noted that the current list of pre-qualified RRF NGOs are all INGOs<sup>90</sup>. The UK's bilateral programme is another funding channel which can be accessed as part of a UN appeal, following a call for proposals or through existing programmes. Based on both the UK Government's Humanitarian Reform Policy, and its Humanitarian Response Funding Guide-

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<sup>85</sup> Funding for 2019 from top donors globally: <https://fts.unocha.org/>

<sup>86</sup> NRC (2018). Principles under pressure; the impact of counterterrorism measures and preventing/countering violent extremism on principled humanitarian action: [https://www.nrc.no/globalassets/pdf/reports/principles-under-pressure/1nrc-principles\\_under\\_pressure-report-screen.pdf](https://www.nrc.no/globalassets/pdf/reports/principles-under-pressure/1nrc-principles_under_pressure-report-screen.pdf); Majid, S & Abdirahman, K & Poole, L & Willitts-King, B (2018). Funding to local humanitarian actors- Somalia case study. ODI/HPG. <https://www.odi.org/sites/odi.org.uk/files/resource-documents/12468.pdf>

<sup>87</sup> Canada 2018 Self Reporting on Grand Bargain [https://interagencystandingcommittee.org/system/files/canada\\_-\\_self\\_report\\_.pdf](https://interagencystandingcommittee.org/system/files/canada_-_self_report_.pdf)

<sup>88</sup> Canada 2018 Self Reporting on Grand Bargain [https://interagencystandingcommittee.org/system/files/canada\\_-\\_self\\_report\\_.pdf](https://interagencystandingcommittee.org/system/files/canada_-_self_report_.pdf)

<sup>89</sup> Ibid.

<sup>90</sup> RRF partners are: Action Against Hunger, ActionAid, British Red Cross, CAFOD, Care International, Christian Aid, Concern, Deutsche Gesellschaft für Internationale Zusammenarbeit, Deutsche Welthungerhilfe, Doctors of the World UK, GOAL, Habitat for Humanity, HALO, Handicap International, HelpAge International, International Health Partners, International Medical Corps, International Rescue Committee, Islamic Relief Worldwide, MapAction, Mercy Corps Scotland, Mine Advisory Group, Mission Aviation Fellowship International, MuslimAid, Norwegian Refugee Council, Oxfam GB, Plan UK, Premiere Urgence Internationale, Relief International, Save the Children UK, Solidarites, Tearfund, World Vision, BBC Media Action, Internews Europe. <https://www.gov.uk/guidance/humanitarian-response-funding>

lines<sup>91</sup> for NGOs, there do not appear to be any legal barriers to directly funding local actors. Emphasis for eligibility is on capacity, governance structures to manage the funds, and compliance with international humanitarian standards and policy commitments of the UK Government.<sup>92</sup> The UK has also committed significant resources to the Start Fund.

**The United States** has been committed to directly supporting local actors and systems before the Grand Bargain agreement.<sup>93</sup> In the USAID office of U.S. Foreign Disaster Assistance (USAID/OFDA) proposal guidelines<sup>94</sup>, there are no legal barriers to directly funding local actors. Instead, proposals are encouraged to have a national agency as the lead, with the international partner playing a technical support role, where needed.<sup>95</sup> According to the 2018 Grand Bargain Self-Reporting, in 2017, USAID/OFDA more than doubled its direct funding to local and national responders (from 0.62% to 1.12% of its annual humanitarian funding), and increased funding towards a number of CBPFs<sup>96</sup>.

**European Civil Protection and Humanitarian Aid Operations (ECHO)** does have legal barriers to directly fund local actors. EU funded humanitarian assistance is implemented through European NGOs, UN agencies and international organisations.<sup>97</sup> The European Council's regulation concerning humanitarian aid clearly states in Article 7(a) that to receive funding an organisation must "*be non-profit-making autonomous organizations in a Member State of the [European] Community*".<sup>98</sup> Despite ECHO's legal barriers, it has committed itself to a series of strategic investments in 'system-transforming initiatives, which are driving the localisation process'. These include projects led by CAFOD to support capacity strengthening and financing of the NEAR network and projects led by the IFRC Secretariat and Christian Aid to promote system-level reform.<sup>99</sup>

**Switzerland** has no legal restrictions on directly funding local actors for humanitarian action. According to the Swiss Agency for Development and Cooperation (SDC), different needs require different expertise and different skills. In some cases, this requires partnering with specialised agencies on the ground; and at other times, requires working with local organisations that know more about the local situation and have a good local network.<sup>100</sup> According to the 2018 Grand Bargain's Self-Reporting, by 2018 Switzerland was channelling 8% of humanitarian funds directly towards local and national actors, including funding through CBPFs. However, the SDC reports that it considers its funding to L/NGOs to be 'significantly higher' but its systems are not yet able to track funds provided through intermediaries.<sup>101</sup>

<sup>91</sup> <https://www.gov.uk/guidance/humanitarian-response-funding>

<sup>92</sup> UK Aid Connect: Frequently Asked Questions (Updated 2017). <https://assets.publishing.service.gov.uk/media/5979c42ded915d6a6f000014/Frequently-Asked-Questions-6092017.pdf>

<sup>93</sup> USAID (2004). Local Systems: A Framework for Supporting Sustained Development. <https://www.usaid.gov/sites/default/files/documents/1870/LocalSystemsFramework.pdf>

<sup>94</sup> USAID Office of U.S. Foreign Disaster Assistance (USAID/OFDA) (2018). Proposal Guidelines. [https://www.usaid.gov/sites/default/files/documents/1866/USAID-OFDA\\_Proposal\\_Guidelines\\_February\\_2018\\_0.pdf](https://www.usaid.gov/sites/default/files/documents/1866/USAID-OFDA_Proposal_Guidelines_February_2018_0.pdf)

<sup>95</sup> Patel, S. & Van Brabant, K. (2017). Op. Cit.

<sup>96</sup> United States of America 2018 Self Reporting on Grand Bargain. [https://interagencystandingcommittee.org/system/files/usa\\_-\\_gb\\_self-report\\_2017.pdf](https://interagencystandingcommittee.org/system/files/usa_-_gb_self-report_2017.pdf)

<sup>97</sup> [https://ec.europa.eu/echo/funding-evaluations/funding-humanitarian-aid/grants-and-contributions\\_en](https://ec.europa.eu/echo/funding-evaluations/funding-humanitarian-aid/grants-and-contributions_en)

<sup>98</sup> European Council Regulation (EC) No 1257/96 of 20 June 1996 concerning humanitarian aid <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31996R1257:EN:HTML>

<sup>99</sup> Metcalfe-Hough, V & Poole, L & Bailey, S & Belanger, J (2018). Grand Bargain annual independent report 2018. HPG/ODI. [https://www.agendaforhumanity.org/sites/default/files/resources/2018/Jun/Grand%20Bargain%20annual%20independent%20report%202018\\_full.pdf](https://www.agendaforhumanity.org/sites/default/files/resources/2018/Jun/Grand%20Bargain%20annual%20independent%20report%202018_full.pdf)

<sup>100</sup> SDC website <https://www.eda.admin.ch/deza/en/home/deza/faqs/faq-umsetzung.html>

<sup>101</sup> Switzerland 2018 Self Reporting on Grand Bargain. [https://interagencystandingcommittee.org/system/files/switzerland\\_-\\_narrative\\_summary.pdf](https://interagencystandingcommittee.org/system/files/switzerland_-_narrative_summary.pdf)

**Sweden** has no legal restrictions to fund local actors. According to the Government's Humanitarian Aid Policy, *'the government makes grants to both Swedish, foreign and international organizations. Special importance should be attached in this connection to institutions in the UN system, the International Red Cross and Red Crescent Movement and NGOs with long experience of humanitarian aid'*.<sup>102</sup> However, Sweden has indicated in its 2018 Grand Bargain Annual Self-Reporting report, that it does not yet provide funding directly to local partners, but plans to identify one agreement modality through which the Swedish International Development Cooperation Agency can directly fund local and national responders. However, through its pooled funds, Sweden contributes significantly CBPFs, Multi-Partner Trust Funds (MPTFs) and the DREF.<sup>103</sup> Sweden increased its contribution to pooled funds from SEK 665 in 2016 to SEK 857 in 2017.<sup>104</sup> It also supported the IFRC DREF (SEK 0.5 million).

**Germany** does not have legal barriers to directly fund local actors. According to the 2018 Grand Bargain's Annual Self-Reporting, Germany estimated that approximately 19.6% of German humanitarian funding in 2018 was provided to local responders (0.04% directly, 2.6% through pooled funds, and around 17% through a single intermediary).<sup>105</sup> Germany increased its contributions to CBPFs from €195.6 million in 2017 to €219 million in 2018.<sup>106</sup>

Based on **Denmark's** Strategy for Development Cooperation and Humanitarian Action, there are no legal barriers to directly funding local actors. However, based on its 2018 Grand Bargain Annual Self-Reporting, as of 2017 Denmark does not provide humanitarian funding for local actors. Instead, it provides humanitarian funding indirectly to local actors through UN agencies, INGOs/Danish strategic CSO partners and pooled funds. Denmark does provide direct funding to local actors in countries with Danish bilateral development programs.<sup>107</sup>

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<sup>102</sup> Swedish Government Humanitarian Aid Policy.  
<https://www.government.se/49b74b/contentassets/df42b91831e34892b7d8e6ffea6f19e5/the-governments-humanitarian-aid-policy>

<sup>103</sup> Ibid

<sup>104</sup> Metcalfe-Hough, V & Poole, L & Bailey, S & Belanger, J (2018). Op. Cit.

<sup>105</sup> Germany 2018 Self Reporting on Grand Bargain.

[https://interagencystandingcommittee.org/system/files/germany\\_-\\_grand\\_bargain\\_-\\_2018\\_self-report\\_germany.pdf](https://interagencystandingcommittee.org/system/files/germany_-_grand_bargain_-_2018_self-report_germany.pdf)

<sup>106</sup> Metcalfe-Hough, V & Poole, L & Bailey, S & Belanger, J (2018). Op. Cit.

<sup>107</sup> Denmark 2018 Self Reporting on Grand Bargain.

[https://www.agendaforhumanity.org/sites/default/files/Grand%20Bargain%20-%202018%20Self-Report%20DENMARK\\_0.pdf](https://www.agendaforhumanity.org/sites/default/files/Grand%20Bargain%20-%202018%20Self-Report%20DENMARK_0.pdf)

## Annex 2: Persons consulted

### Colombia:

	Organisation	Type of organisation	Persons interviewed	Role	Location
1.	COSUDE	Donor	Fabrizio Poretti	Head	Bogotá
2.	Alianza por la Solidaridad	L/NNGO	Hellen Quesada	Programme Coordinator	Bogotá
3.	Colombian Red Cross	RCM	Margarita Arias	Coordinator of Institutional Relations	Bogotá
4.	Corporation Childhood and Development	L/NNGO	Monica Hoyos	Deputy Director	Bogotá
5.	Corporation Childhood and Development	L/NNGO	Johana Rodríguez	Emergency Response Coordinator	Bogotá
6.	Diakonie KatastrophenHilfe	INGO	José Luis Casas	Administrator	Bogotá
7.	ECHO—Cooperation Section	Donor	Andrés Triviño	Programme Assistant	Bogotá
8.	EU—Cooperation Section	Donor	Marta Ceravolo	Head	Bogotá
9.	Halu Foundation	L/NNGO	Claudia Lilia Rodríguez	Head	Bogotá
10.	Halu Foundation	L/NNGO	Carlos Valenzuela	Head of Programmes	Bogotá
11.	Halu Foundation	L/NNGO	Leonardo Sánchez	Lawyer	Bogotá
12.	International Federation of the Red Cross	RCM	Nadia Khory	Head of Delegation	Bogotá
13.	International Migration Office	UN	Iván Mauricio Gaitán	GIFMM Coordinator	Bogotá
14.	Jesuit Service of Refugees	INGO	Mauricio Garcia	Regional Director	Bogotá
15.	USAID/OFDA	Donor	Elizabeth Ross	Humanitarian Advisor, Policy Team	Washington DC
16.	USAID/OFDA	Donor	Phil Gelman	Team Leader / Disaster Assistance Response Team (DART)	Bogota

17.	USAID/OFDA	Donor	Jennifer Dorrance	Deputy Leader of Planning—Venezuela Regional Crisis DART	Bogota
18.	OCHA	UN	Gerard Gómez	Head	Bogotá
19.	OCHA	UN	Nicolás Mayr	National Field Coordinator	Bogotá
20.	Pastoral Social	L/NNGO	Alejandro Mosquera	Emergencies Coordinator	Bogotá
21.	PLAN	INGO	Camilo Rocha	Emergencies Coordinator	Bogotá
22.	UNHCR	UN	Ana White	Head—communications and Advocacy	Bogotá
23.	UNHCR	UN	Rosalie Fournier	Cluster Protection Coordinator	Bogotá
24.	UNHCR	UN	Leonardo Guerrero	Official—Programme Assistant	Bogotá
25.	UN Multi-partner Trust Fund	UN	Pontus Ohrstedt	Head of United Nations Resident Coordinator's Office	Bogotá
26.	UN Multi-partner Trust Fund	UN	Santiago Quiñones	Deputy Coordinator	Bogota

## Ukraine:

	Organisation	Type of organisation	Persons interviewed	Role	Location
27.	Bohdan Havrylyshyn Family Foundation	L/NNGO	Marianna Yeleyko	PR Specialist	Kyiv
28.	Capable Community NGO	L/NNGO	Nataliya Zhukova	Head	Tokmak, Zaporizhzhia oblast
29.	Caritas Kramatorsk CF	L/NNGO	Alina Neyshadt	Fundraising Specialist	Kramatorsk, Donetsk oblast
30.	Caritas Kramatorsk CF	L/NNGO	Kateryna Ovcharenko	Coordinator	Kramatorsk, Donetsk oblast
31.	Center for Employment of Free People	L/NNGO	Liudmila Gordiyenko	Coordinator	Kyiv
32.	Christian Rescue Service	L/NNGO	Artem Semenets		Kyiv

33.	Council of Europe	INGO	Olga Malysh	IDP Communication Expert	Kyiv
34.	Country of Free people	L/NNGO	Oksana Vasilieva	Coordinator	Kramatorsk, Donetsk oblast
35.	Crimean Diaspora NGO	L/NNGO	Anatoli Zasoba	Head	Kyiv
36.	Danish Red Cross	RCM	Dmitry Rusakou	Disaster Management Delegate in Ukraine	Kyiv
37.	DRC/DDG	INGO	Kateryna Mashchenko	Protection Officer	Slovyansk, Donetsk oblast
38.	Embassy of Canada to Ukraine	Donor	Yuliia Koba	Program Analyst, Development Section	Kyiv
39.	Embassy of Great Britain to Ukraine	Donor	Steven Loyst	Humanitarian Advisor	Kyiv
40.	FAO	UN	Mikhail Malkov	Development Programme Coordinator in Ukraine	Kyiv
41.	Future Development Agency NGO	L/NNGO	Igor Arbatov	Head	Kyiv
42.	Help Age	INGO	Svitlana Fesenko		Slovyansk, Donetsk oblast
43.	ICRC	RCM	Roger Ruffy	Deputy Head of Delegation	Kyiv
44.	ICRC	RCM	Jelica Bogdanovic	Cooperation Coordinator	Kyiv
45.	IDP Counselors program	L/NNGO	Oleksandra Magurova	Counsellor in Kyiv oblast	Kyiv
46.	IFRC	RCM	George Gigiberia	Head of Country Office	Kyiv
47.	International Agency of Change NGO, Synergy Development Consulting	L/NNGO	Svitlana Olieinikova	Director, Fundraising expert	Kyiv
48.	ISAR Ednannia	L/NNGO	Natalia Klymova	Capacity Building Coordinator	Kyiv
49.	Kozhen Mozhe (Everyone Can) CF	L/NNGO	Maryna Lysak	Head	Kyiv
50.	Proliiska NGO	L/NNGO	Yevgeni Kaplin	Head	Kharkiv, Kharkiv oblast



51.	Right to Protection CF	L/NGO	Stuart Linder	Development Officer	Kyiv
52.	Right to Protection CF	L/NGO	Vladimir Oleksenko	Protection Coordinator	Slovyansk, Donetsk oblast
53.	Right to Protection CF	L/NGO	Volodymyr Orekhov	Team Leader	Slovyansk, Donetsk oblast
54.	Save the Children	INGO	Dariusz Zietek	Country Director	Slovyansk, Donetsk oblast
55.	SOS Children Villages	INGO	Daria Kasianova	National Programme Development Director	Kyiv
56.	SOS Kramatorsk NGO	INGO	Oleksandr Voroshkov	Head	Kramatorsk, Donetsk oblast
57.	Stabilization Support Services	L/NGO	Dermot Hamilton	Ukraine Program Director	Kyiv
58.	Stabilization Support Services	L/NGO	Nadiya Kono-shevych	Gender Main-streaming Specialist	Kyiv
59.	Strong Community NGO	L/NGO	Anna Gladka	Head, Active Citizens Ukraine Facilitator	Kyiv
60.	Ukraine NGO Forum	L/NGO	Marcella Michaud	Director	Kyiv
61.	Ukrainian Red Cross	RCM	Lilia Bilous	Director General	Kyiv
62.	UN OCHA	UN	Alice Sequi Armanni	Ukraine Head of Office	Kyiv
63.	UN OCHA	UN	Ivane Bochorishvili	Deputy Head of Office	Kyiv
64.	UNICEF	UN	Laura Bill	Deputy Representative	Kyiv
65.	USAID/OFDA	Donor	Sarah Jackson	Senior Humanitarian Advisor for Ukraine	Kyiv
66.	Vostok SOS (ex)	L/NGO	Olga Sergeeva	Coordinator	Kyiv
67.	WHO	UN	Dr Jarno Habicht	WHO Representative and Head of Country Office to Ukraine	Kyiv
68.	WHO	UN	Dr Gabriel Novelo Sierra	Health Cluster Coordinator	Kyiv

## Ethiopia:

	Organisation	Type of organisation	Persons interviewed	Role	Location
69.	Action Aid	INGO	Tsegaw Lencha	Humanitarian Response Manager	Addis Ababa
70.	AFD	L/NNGO	Yoseph Negassa	Country Director	Addis Ababa
71.	ANNPCAN	L/NNGO	Wakuma Chimsa	Senior Program Coordinator	Addis Ababa
72.	CAFOD/SCIAF/Trocaire	INGO	Daniel Gebremedhin	Project Manager	Addis Ababa
73.	Catholic Relief Services	INGO	Biruk Tesfaye	Emergency Program Manager	Addis Ababa
74.	Catholic Relief Services	INGO	Dr Legesse Dadi	Deputy Head of Programs	Addis Ababa
75.	Catholic Relief Services	INGO	Masresha Yiman	Senior Program Officer	Addis Ababa
76.	CCRDA	L/NNGO	Amanuel Aseged	Humanitarian Forum Coordinator	Addis Ababa
77.	Community Initiatives Facilitation and Assistance (CIFA)	L/NNGO	Guyo Dhenge	Dhenge	Borena
78.	Concern Worldwide	INGO	Eillen Morrow	Country Direct	Addis Ababa
79.	Dan Church Aid	INGO	Daniel Mehretstedik	Programme manager	Addis Ababa
80.	Ethiopia Red Cross	RCM	Engida Mandefro	Deputy Secretary General	Addis Ababa
81.	Ethiopian Catholic Church Apostolic Vicariate of Hosanna (AVH)	L/NNGO	Fikreab Mekebo	Social Development Program Manager	Hosahina
82.	Norwegian Church Aid	INGO	Eivind Aalborg	Country Director / representative	Addis Ababa
83.	Norwegian Church Aid	L/NNGO	Zelalem Ayichew	Emergency Manager	Addis Ababa
84.	Rift Valley Children and Women Development Association	L/NNGO	Birhanu Geleto	Country Director	Addis Ababa
85.	SOS Sahel	L/NNGO	Kidist Hailemariam	Business Development and Communication Manager	Addis Ababa
86.	Terepeza Development Association (TDA)	L/NNGO	Bereket Tassew	Country Director	Wolait Sods

87.	UN OCHA	UN	Tersit Belete	Fund Manager	Addis Ababa
88.	USAID/OFDA	Donor	Edan Johna	Senior Disaster Operations Specialist, Ethiopia and Kenya	Addis Ababa
89.	USAID/OFDA	Donor	Juan Carlos Rodrigues	Acting Chief, Office of Assets in Transition and Acting Senior Humanitarian Advisor	Addis Ababa
90.	Women Support Association	L/NGO	Martha Nemera	Country director	Addis Ababa

### Global:

	Organisation	Type of organisation	Persons interviewed	Role	Location
91.	Catholic Relief Services	INGO	Amanda Schweitzer	Technical Advisor—Humanitarian Partnership and Capacity Strengthening	USA
92.	Christian Aid	INGO	Michael Mosselmans	Head of Humanitarian Programme practice, policy and advocacy	UK
93.	DFID	Donor	Tim Stone	Policy Manager—Humanitarian and Protracted Crisis Policy Group	UK
94.	DFID	Donor	Olivia Roberts	Humanitarian Advisor	UK
95.	ECHO	Donor	Brigitte Mukengeshayi	Policy officer, Localisation,	Brussels
96.	Humanitarian Advisory Group	Consultancy	Kate Sutton	Director	Australia
97.	Humanitarian Policy Group, ODI	Think tank	Dr. Veronique Barbelet	Senior Research Fellow	UK
98.	Oxfam	INGO	Anita Kattakuzhy	Humanitarian Policy Adviser, Localization	Amman
99.	Start Network	Consortium	Lucretia Puentes	Start Fund Programme Manager	UK
100.	Start Network	Consortium	Vincent Henson	Due Diligence Platform Manager	UK
101.	SDC Switzerland	Donor	Julia Knittel	Programme Officer	Berne

102.	SDC Switzerland	Donor	Regina Gujan	Deputy Head. Multilateral Affairs Division.	Berne
103.	USAID/OFDA	Donor	Elizabeth Ross	Policy Team, Humanitarian Advisor	USA
104.	WFP	UN	Ellen Wielezynski	NGO Partnership area	Nairobi
105.	World Vision International	INGO	Christine Latif	Technical Director, Humanitarian Partnership	Dubai

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