

BRIDGING THE INTENTION TO ACTION GAP: THE FUTURE ROLE OF INTERMEDIARIES IN SUPPORTING LOCALLY LED HUMANITARIAN ACTION

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HUMANITARIAN ADVISORY GROUP







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About the research partners

CoLAB Consultants is a Fiji-based development consultancy partnership managed by Iris Low and Leaine Robinson, who have over 25 years of combined experience in Fiji and the Pacific.

<u>**GLOW Consultants (Private) Limited,**</u> based in Pakistan, is a leading national entity providing practice solutions and field implementation support to donors, their implementing partners and research institutions. GLOW has successfully completed more than 100 third-party monitoring and evaluation assignments.

inSights (the Institute of Innovation for Gender and Humanitarian Transformation) is a Bangladeshbased social enterprise providing insights that challenge the current ways of working in humanitarian aid and gender affairs. inSights aims to transform ideas within the humanitarian, social and businesses sectors and turn them into innovations, knowledge and strategies. inSights works to equip humanitarian responders – people and organisations – with the knowledge, skills and competencies to ensure people affected by crises get the right help when they need it most.

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Humanitarian Advisory Group (HAG) was founded in 2012 to elevate the profile of humanitarian action in Asia and the Pacific. Set up as a social enterprise, HAG provides a unique space for thinking, research, technical advice and training that contributes to excellence in humanitarian practice.



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The views expressed are solely those of the authors and do not necessarily represent those of the Swiss Government, its Workstream co-convener, the IFRC, or other Workstream members



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Swiss Agency for Development and Cooperation SDC

Research participants' responses to the question: "What is one word you would use to describe the ideal future role of intermediaries?"¹



EXECUTIVE SUMMARY

Since the World Humanitarian Summit 2016, the discussion on locally led humanitarian action has evolved considerably. The debate has become more nuanced in many ways, and with respect to intermediaries, the discussion has become less polarised and more constructive. This research paper contributes to that constructive direction by recognising that intermediaries have a role to play but that **the future role of intermediaries needs to change substantially from the current status quo.**

This study results from a shared ambition of the members of the Grand Bargain Localisation Workstream to increase clarity and ambition as to how the role of intermediaries should be evolving. In consultation with its co-convener, the International Federation of Red Cross and Red Crescent Societies, and members of the Workstream, the Swiss Agency for Development and Cooperation commissioned the project to explore the future role of organisations when acting as intermediaries. The study was conducted during April and May 2021 and involved over 100 stakeholders from 36 countries from across the humanitarian system.

What this paper does

- Proposes a future role for intermediaries in supporting locally led response, recognising that an important transition needs to take place.
- Employs a behavioural science approach to help understand why intermediaries are not already transitioning into this role.
- Identifies interventions for change in three essential areas: motivation, opportunity and capabilities to support change to an ideal future role for intermediaries.

Organisations acting as intermediaries

The research recognises that organisations can play multiple roles in humanitarian preparedness, response and recovery programming. These are broadly divided into two areas:

- **Direct implementation:** where an organisation receives funding from the donor and directly implements the activities in the target areas or with target communities.
- Intermediary role: where an organisation, network or mechanism acts as an intermediary between donors and national or local implementing organisations through provision of funding or other support.

This research focuses on the intermediary role though acknowledges the relationship between both modalities.

KEY FINDINGS

The existing role of intermediaries needs to fundamentally shift to better support locally led action.

a. The balance of direct implementation and intermediary roles for organisations not local to context needs to shift. The existing balance is not considered to be appropriate or fit for purpose, and international organisations in many contexts continue to inappropriately default to direct implementation.²

b. The role of the intermediary, when requested or required, needs to be more appropriate and accountable. Even when international organisations act as intermediaries, many local and national organisations do not receive the support they request or believe they need to maximise their effective contribution to the humanitarian system.³

Barriers preventing change are currently far more powerful than the triggers that will motivate change.

Default processes, rewards for new behaviours and incentives are inconsistent and lack accountability. Even if there is intention to change as an intermediary organisation, the reality of enacting changed behaviours is often prohibitively complex, overwhelming and disincentivised.

Change is required in three key areas to achieve a more effective future role for intermediaries.

Concrete changes are required in the **motivation** for change; the **opportunity** for intermediaries to make easy choices that will effectively support change; and the deployment of **capabilities** that are adapted according to actor and context to ensure a fit-for-purpose contribution.

A VISIBLE AND VALUED ROLE FOR INTERMEDIARIES

The proposed future role is that *intermediaries empower local and national organisations to drive, define and deliver principled humanitarian responses to needs in their communities.*

The model below captures the future role of intermediaries with six core capabilities to empower national and local organisations, recognising that capabilities alone will not facilitate the fundamental shift required without the motivation and opportunity for change.

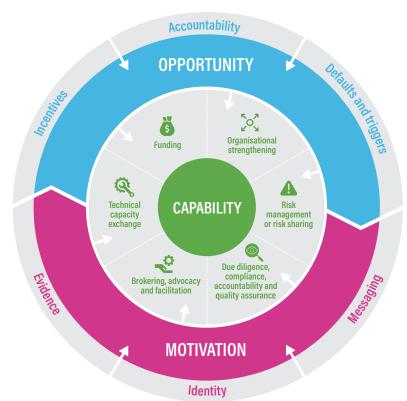


Figure 1: Proposed model for the role of intermediaries

RECOMMENDED INTERVENTIONS

There is evidence that innovative organisations and their partners across the system are paving the way towards a more effective intermediary role. In learning from these frontrunners, and insights from behavioural science, we have developed the following recommended interventions. They recognise the importance of change across all three areas of opportunity, motivation and capability.

Opportunity

Change the defaults

Donors, international, national and local actors should consistently build in a range of default processes that incentivise ideal intermediary practices across programming and partnerships in design, contracting and implementation.

► For example, preferred supplier pools could be established. Intermediaries who are effectively partnering could go into a pool of preferred suppliers or continue to receive funding for effective partnership practices.

Hold intermediaries accountable

Accountability that is driven and informed by local and national actors could create transformational change. Local and national actors should play a far more prominent role in holding intermediaries accountable.⁴

For example, establish and use processes for local actors to provide direct feedback and assessments or partner evaluations of international partners to inform programming and funding decisions.

"I do think that if we do want people to shift there would have to be some sort of carrot or stick. That has to be coupled with assertive willingness on the part of the donors looking at the ways in which they are contributing to this." (INGO representative)

Motivation

Make the goal and associated benefits visible and powerful

Clear and consistent direction and messaging that articulates the importance of and expectations of the intermediary role would motivate behaviour change. A consolidated approach from donors would clarify priorities and approaches and therefore increase motivation. Donors and intermediaries should continue to generate and document evidence about the benefits of locally led humanitarian action. Frequently communicating the growth in evidence and the progress in the sector towards the collectively articulated goal will also provide a sense of momentum and progress.

► For example, agreeing on collective donor messaging on the ultimate goal, the importance of intermediary roles and the associated benefits of shifting the status quo.

Create and communicate a sense of momentum

Evidence that more and more intermediaries are shifting their behaviour creates a sense that the sector is transforming and those not on board will get left behind. This can be a powerful motivator.

For example, by communicating changes and profiling best practice, such as: "Over 40% of intermediaries are allocating overhead budget lines to local actors because it supports a more effective role for local and national actors in their own communities." "Other donors expect reporting on how much funding is reaching local partners because they know that it reflects improved partnership practices and strengthens the impact of their aid dollars."

"If intermediary organisations were not only competent enough, but committed enough, localisation will happen. Intermediary organisations need to fix their orientation." (National actor)

Capability

Determine the fit-for-purpose role

International organisations in many contexts continue to default to direct implementation without considering whether an intermediary role is more important and appropriate. Even where an intermediary role may be appropriate, organisations often default to a predetermined way of working with partners based on their own capabilities. This research highlights that there is a need to break these defaults through an intentional and considered process to determine fit-for-purpose roles that adapt to context and can be interrogated by partners and donors alike.

► For example, employ or resource partnership brokers or managers who can analyse and articulate the complementary role the organisation can play, and the combination of capabilities that are requested and fit for the purpose of enabling local and national actors.

Invest in pooled funding mechanisms that empower local and national actors

Pooled funds are well placed to deliver fit-for-purpose capabilities in complex contexts. They are particularly effective as intermediaries if local and national organisations have meaningful engagement in fund management and decision-making.

For example, advocate for, and fund, pooled mechanisms that articulate an intention to empower the role of national and local organisations and have established processes to promote capacity exchange.

"There should be that debate on evaluating their [intermediary] fit for purpose role, what value add they [intermediaries] are bringing on board ... Donors should ask intermediaries, how are you shifting?" (National actor)

INTRODUCTION

Since the World Humanitarian Summit in 2016, the discussion on locally led humanitarian action has evolved considerably. The debate has become more nuanced in many ways, and with respect to intermediaries, the discussion has become less polarised and more constructive. This research paper contributes to that constructive direction by recognising that intermediaries have a role to play but that **the future role of intermediaries needs to change substantially from the status quo.**

The Grand Bargain Localisation Workstream 2 and its co-convenors, the International Federation of Red Cross and Red Crescent Societies (IFRC) and the Swiss Agency for Development and Cooperation, commissioned this study to explore the future role of organisations when acting as intermediaries. The study was conducted during April and May 2021 and involved over 100 stakeholders, from 36 countries, from across the humanitarian system.

This paper outlines a clear role for intermediaries in supporting locally led action through the articulation of a proposed future role, associated model and recommended behavioural change interventions.

The paper has four sections.

- Section one proposes a future role for organisations acting as intermediaries in supporting locally led response
- Section two outlines the problem: why did this need to be researched? What is not working?
- Section three presents the evidence in relation to areas of potential change to address the identified problem. It considers the change in three areas – opportunity, motivation and capability – needed to support a more effective intermediary role

 Section four concludes with a summary of the research findings and recommended behaviour change interventions.

The intermediary role

The research recognises that organisations can play multiple roles in humanitarian preparedness, response and recovery programming. These are broadly divided into two areas:

- Direct implementation: where an organisation receives funding from the donor and directly implements the activities in the target areas or with target communities. This has been, and will continue to be, a critical role for many organisations. Local organisations most frequently work directly with affected communities, and many national, and international organisations also play this role
- Intermediary role: where an organisation, network or mechanism acts as an intermediary between donors and local implementing organisations through provision of funding or other support. This includes international intermediaries such as the United Nations (UN) or international non-governmental organisations (INGOs), national organisations, pooled funding and network mechanisms. Organisations acting as intermediaries also play a critical role in supporting local leadership and effective response.⁵

This research focuses on the intermediary role though acknowledges the relationship between both modalities.

The Grand Bargain, intermediaries, and the Localisation Workstream

The Grand Bargain is an agreement between more than 50 of the biggest donors and aid providers worldwide. The Localisation Workstream includes the signatories to the Grand Bargain (including UN and donor agencies, INGOs, representatives of the Red Cross and Red Crescent Movement) and local actors. The IFRC and the Swiss Agency for Development and Cooperation are co-conveners of the Localisation Workstream.⁶

The Grand Bargain commitments on localisation include six areas intended to strengthen support to local and national actors. Intermediaries play a critical role in supporting the realisation of the Grand Bargain commitments, but have a much broader role in supporting locally led action that goes beyond these commitments, as explored in this paper.

METHODOLOGY

The research used a largely qualitative approach, including a document review, interviews and workshops (Figure 1). The testing of change hypotheses using a behavioural science approach was a core part of the research approach. Key informant interviews captured perspectives from 64 stakeholders based in 22

countries. Three global workshops were held with 72 stakeholders, including one targeted at donors and the other two at international, national and local actors. Peer review was undertaken by the Localisation Workstream subworking group on intermediaries.



Figure 1 Research approach

Ethical and localised research processes

The research employed a localised approach, and was conducted with four national research partners based in four regions: GLOW Consultants and the Institute of Innovations for Gender and Humanitarian Transformations (Pakistan, Bangladesh, South Asia), CoLAB (Fiji, Pacific) and independent consultant Ziad Antonios (Lebanon, Middle East); interviews and workshops gathered insights from other regions including Africa, Europe and North America (Figure 2). The entire research team helped contextualise the design for each region and collect and analyse data. Humanitarian Advisory Group (HAG) abides by the Australian Council for International Development's (ACFID) guidelines on conducting ethical research.⁷



Figure 2 Engagement of research participants

Limitations

- Representativeness of the findings: the research reached participants in 36 countries that include crisis and disaster contexts across six regions. There was a larger representation of countries where the team were based (Bangladesh, Afghanistan and Pakistan, Lebanon and the Pacific). The research team tried to correct this bias by intentionally reaching out to interview organisation representatives in other countries and regions.
- Sampling bias: the research used an intentional sampling approach, reaching out to key stakeholders across all relevant organisations (UN, INGOs, national and local NGOs and pooled fund representatives).
 It proved easiest to generate interest and

conduct interviews among individuals with an interest in localisation. The research team tried to overcome this limitation by reaching out to organisations that have been less involved in public localisation discussions, but we acknowledge that there may be some sampling bias.

Applicability of findings across all types of intermediaries: the research sought different types of intermediaries in multiple contexts, and we believe the findings have broad applicability. However, we were unable to interview national government representatives from countries that have recently received humanitarian assistance, and we reached only a few interviewees with expertise in pooled funding mechanisms, hence the findings in relation to these actors draw more heavily on the document review and third party reflections on their role.

Time limitations: the research was carried out between April 19th 2021 and May 24th 2021. This short timeframe limited our ability to consult broadly and verify emerging findings systematically. The research team tried to minimise this limitation by conducting an initial review of the findings and recommendations of previous research on the role of intermediaries. This baseline enabled the research team to develop change hypotheses that could be tested in the workshops and interviews.

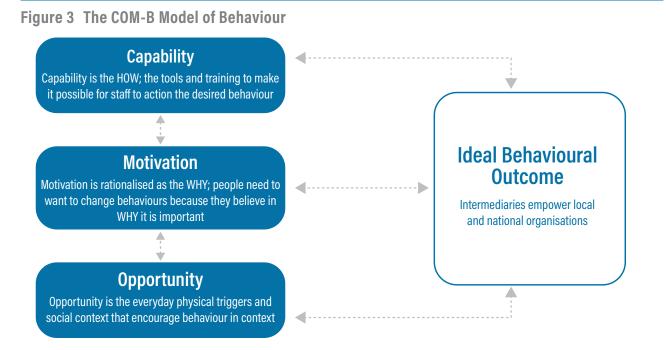
About the behavioural science approach

Behavioural science is the science of understanding and changing human behaviour. It is a cross-disciplinary field that incorporates behavioural economics, neuroscience, and social and cognitive psychology. Behavioural science helps to understand why behaviour does not always reflect stated beliefs or commitments, and why context is so important in shaping behaviour. Insights generated using this approach have been effective in shifting behaviours in other contexts such as governance, health and the environment.⁸

Although there is evidence about ideal and effective intermediary roles, the behaviour changes required to achieve them are not occurring. This research explores why the shift is not happening and identifies levers for change, with the aim of bringing a new perspective to the conversation and supporting humanitarian actors to realise their intentions. The COM-B model (Figure 3), described below, provides a framework for understanding behaviour.

About the COM-B model

The COM-B system is a framework for understanding behaviour. The framework is based on a literature review of over 1,200 peer-reviewed articles and analysis of 19 established behaviour change frameworks. It is one of the most rigorous behaviour change frameworks available and is utilised globally, by the public and private sectors alike. The COM-B System identifies three conditions – capability, opportunity and motivation – as essential for the behaviour to occur.⁹



Adapted from: Michie, s. van Stralen, M. & West, R (2011). The Behaviour Wheel: A new method for characterising and designing behaviour change interventions. Implementation Science, 6(1):42'

SECTION 1: PROPOSED FUTURE ROLE FOR ORGANISATIONS ACTING AS INTERMEDIARIES

For the humanitarian system to support a more effective role for intermediaries, concrete changes are required in relation to: **the motivation** for intermediaries to work differently in support of locally-led humanitarian action; **the opportunity** for intermediaries to make choices that will enable a more appropriate role for national and local organisations; and adaptation of a core set of **capabilities**, according to actor and context, to ensure a fit-for-purpose contribution. The model (Figure 4 overleaf) includes hypotheses, drawn from the literature and tested in this research, about the best avenues for transformation.

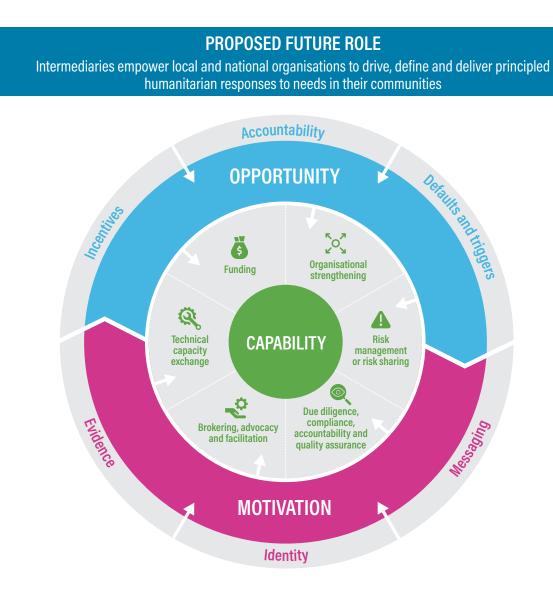
Three key principles underpin the future role:

 A focus on empowering and enabling national and local organisations rather than subcontracting relationships, based on the commonly shared understanding that they are currently under-resourced and their comparative advantages are underutilised due to top-down approaches

- Recognition that intermediary organisations may also act as direct implementers of humanitarian action if appropriate and required, based on the principle of complementarity
- Acknowledgement that enabling an effective role for local and national organisations is not an end in itself, but is intended to meet the needs of those affected by humanitarian crisis more effectively and in line with humanitarian principles.¹⁰

Photo by Tharun Thejus on Unsplash

Figure 4 Proposed model and hypotheses



Opportunity hypothesis

If organisations and mechanisms are incentivised and held accountable to partner effectively with local and national organisations, then they will increasingly support locally led humanitarian action.

Capability hypothesis

If tools and approaches support the identification of 'fit for purpose' intermediary roles according to organisational mandate and context, then organisations can better support locally led humanitarian action in an appropriate and complementary way.

Motivation hypothesis

If intermediaries believe they have an ongoing role in humanitarian action and can clearly define that long term role, then they are more likely to actively support the contribution of local and national actors.

SECTION 2: WHAT IS NOT CURRENTLY WORKING?

Broad consensus exists about the critical role of organisations acting as intermediaries in a more appropriate and relevant humanitarian system. This role is not static or uniform and will continue to exist into the foreseeable future. **Evidence does not suggest that the intermediary role should be made redundant in the short term.** However, there is strong evidence that its current formulation is inadequate; most actors – international and local – believe **the role needs to change**.¹¹

"I think intermediaries do need to take on a new role in the system ... they also need to take on new approaches and attitudes." (INGO representative)¹² Change is required in two ways:

 The balance of direct implementation and intermediary roles for organisations not local to context needs to shift.
 The existing balance of roles played by international organisations is not considered to be appropriate or fit for purpose. Most humanitarian actors believe that the role of many organisations that are not local to context needs to shift incrementally from

direct implementation to an intermediary

role.¹³
2. When required, the role of intermediary needs to be more appropriate and accountable. Even when international organisations act as intermediaries, many local and national organisations do not receive the support they request or believe they need in order to enable their effective contribution to the humanitarian system.¹⁴

PROBLEM STATEMENTS

Overarching problem: The existing authorities, default processes and rewards are structured in a way that sustains the status quo. Even if there is intention to change, the reality of enacting the desired behaviours is often prohibitively complex and overwhelming. Without foundational change, the sector is likely to continue to experience very slow incremental change.

This research identified barriers in all three condition areas for behaviour change: opportunities for change are often absent; motivation for change is low or inconsistent; and capabilities, whilst often present, are not deployed as fit for purpose.



What we mean by opportunity:

Opportunity is the "what" - referring to the everyday physical triggers and social context that encourage the desired behaviour. What we mean by motivation: Motivation is rationalised as the "why" – people need to want to change behaviours because they believe in why it is important.

What we mean by capability: Capability is the "how" – both physical and psychological – that makes it possible to action the desired behaviour. It includes aspects such as knowledge, tools and training.

The following section provides an analysis of these three areas and the blockages that exist (problem statements), and analysis that supports the generation of solutions outlined here and in section 3. **A**

Opportunity problem statement: The

humanitarian system lacks salient cues like defaults or incentives, and intermediaries and donors do little to encourage the desired behaviours. As a result, little consistency or accountability exists, decreasing the likelihood of driving the desired behaviour.

Existing humanitarian systems and processes do not facilitate an effective intermediary role. Opportunity barriers include intermediary and donor approaches that do not facilitate principled partnerships or good funding practices for local and national actors, shifts in organisational strategy or effective risk management. Donor requirements can contribute to approaches that favour subcontracting models over partnership approaches. Incentives or defaults that could drive or support change are lacking. There is also a strongly held perception that the environment is too complex to enable the required behaviour changes. This complexity is driven by the number of crisis contexts and organisations in which behaviour needs to change, as well as the high turnover of staff within these contexts.¹⁵ This obstructs articulation of a clear path for behaviour change.

Many of these default – and flawed – systems and processes are driven by engrained and habitual behaviours. Despite knowledge of practices that support increased opportunity to localise humanitarian action, the status quo and existing behaviours hinder even small tweaks and adaptions to longstanding systems. In addition, processes to disrupt existing behaviour, such as new cues, rewards or accountability mechanisms, are scarce.¹⁶

Moti

Motivation problem statement: The

benefits, progress in or evidence of the efficacy of the desired intermediary behaviours are invisible. As a direct result, intermediaries struggle to define the role and motivation to engage with the problem is low. Donors find it challenging to shift the status quo, due to their perceptions of risk and the quality of localised responses. In addition, current measures of success (growth and reach) contradict the behaviours required.

Motivation challenges represent a strong barrier to an effective intermediary role. Despite the significant progress that has taken place over the past five years since the World Humanitarian Summit to provide more support and funding for local and national responders,¹⁷ there is no clear unifying message about why intermediaries should work more effectively with national and local actors (either self-generated as a group of actors or articulated by donors). The intermediary role in supporting locally led action is presented. variously and inconsistently, as both seeking to reduce power imbalances within the sector, and a means of meeting humanitarian needs more effectively and efficiently. The lack of progress to reduce power imbalance and the lack of evidence to support the claims of greater effectiveness and efficiency across different humanitarian contexts greatly undermines motivation.18

Organisations acting as intermediaries are being pushed to change their role when they have no clear sense of why it is necessary, and they still maintain a very strong sense of identity associated with their existing roles. Organisations may not be motivated to meaningfully reimagine



Behavioural science principle

Habit: An automatic and rigid pattern of behaviour in specific situations, which is usually acquired through repetition and develops through associative learning. 'Habit loops' involve a cue that triggers an action, the actual behaviour, and a reward.

their roles when they perceive it to require them to cede power, influence and components core to their history and identity. The shift is also contrary to publicly shared measures of organisational success framed in terms of financial growth and operational reach.¹⁹

This has created a perverse situation for many organisations that have committed to support locally led response but in fact are not motivated to fundamentally shift their roles. The result is creative reframing of their existing roles to fit a localisation narrative. Many international actors have started describing themselves as being local actors, and therefore are not required to change further. This is common for many INGOs with local offices that may have shifted to a more nationalised staff base. Their perceived success in reframing their role with no consequence undermines and frustrates the efforts of organisations that are motivated to undertake real change.²⁰

Capability problem statement: Donors, intermediaries and their partners cannot see an achievable way to identify fitfor-purpose intermediary roles that adapt to context and organisation; they

lack the tools and approaches. Fit-forpurpose roles may prioritise different components of the intermediary model to ensure appropriateness to context or organisational mandate. Existing research and data gathered in this study provide a comprehensive understanding of the capabilities that intermediaries require to effectively work with national and local organisations to empower them to meet the needs of affected populations.²¹ Broadly, these fall into six areas of capability that provide a useful starting point for organisations to think through the skills and tools needed to be an effective intermediary (see Figure 4, page 13).

Organisations must determine the most fitfor-purpose role and most appropriate mix of capabilities. The most useful combination of capabilities will vary by context and organisation; an approach might work for an organisation acting as an intermediary in the Middle East, but be ineffective or even damaging in Southeast Asia. The types of capabilities or approaches that are most effective for an INGOs and pooled funding mechanisms will differ. This inevitably leads to confusion about what capabilities need to be developed in which locations and by which actors.²² Behavioural science suggests considerable System 2 attention (see below) is needed to establish the best fit for each context; many organisations simply don't have the time or dedicated attention available.

Behavioural science principles

Status quo bias: A preference for the current state of affairs. The current baseline is taken as a reference point, and any change from that baseline is perceived as a loss.

Loss aversion: The tendency to prefer avoiding losses over acquiring equivalent gains; the idea that "losses loom larger than gains". It is thought that the psychological pain of losing something is about twice as strong as the pleasure of gaining it.

System 2 Thinking: A slow, controlled, and analytical method of thinking in which reason dominates. Unlike system 1 thinking (fast, automatic, intuitive), it requires energy and attention to consider all choices. It is a limited resource and is therefore used sparingly.

SECTION 3: EVIDENCE FOR CHANGE

This section presents the evidence from the research that either supports or refutes the hypotheses in the areas of opportunity, motivation and capability. It also presents a behavioural science analysis of the interview data that provides insights into how the sector can address some of the barriers to a more effective intermediary role.

Most existing research relates to capability – the skills and approaches required to fund and strengthen the capacity of national and local partners. Our overarching analysis suggests that a focus on capability alone will not bring about the necessary changes to the intermediary role. In order to shift successfully, capability must be accompanied by increased motivation and opportunities in the social and physical environment. Our research suggests the greatest potential for change lies in opportunity – the triggers and defaults that encourage behaviour change. As a result, the following section considers the potential for behavioural changes in the area of opportunity, followed by motivation and finally capability.

BEHAVIOUR CHANGE IN OPPORTUNITY



Hypothesis tested throughout the research

If organisations and mechanisms are incentivised and held accountable to partner effectively with local and national organisations, then they will increasingly support locally led humanitarian action.

If we start with the proposition that intermediaries empower local and national organisations to drive, define and deliver principled humanitarian responses to needs in their communities, then the key question we need to answer in relation to opportunity is:

Poes the context that surrounds intermediaries encourage or prohibit them from empowering national and local actors?

This research shows that the greatest change needed for an effective intermediary role lies in the realm of opportunity, in particular through incentives, accountability and disrupting default processes. This research found clear evidence that incentives work in some situations and with some organisations acting as intermediaries.

Multiple examples demonstrate how donor incentives have contributed to shifting behaviours, in particular around quality funding and effective partnership practices. Guidance is also available to enhance arrangements between donors and international intermediaries in reaching Grand Bargain commitments.²³ The Netherlands Dutch Relief Alliance mechanism has established a range of default requirements, including a minimum 25% direct funding target and clear budget targets (5–8%) to be allocated for institutional capacity-building. This has triggered several intermediaries to change partnership and funding practices, and local and national partners have witnessed the impact.24 The United Kingdom's Foreign, Commonwealth and Development Office (FCDO) guidance on provision of indirect costs to downstream

partners for the Rapid Response Facility has supported intermediary organisations to change their practices and transfer these costs to partners across all humanitarian funding. The FCDO has also supported mechanisms such as the Humanitarian Assistance and Resilience Programme Facility (HARP-F) in Myanmar to transition funding and management to local and national actors.²⁵

Evidence suggests that a donor preference for working with intermediaries that partner effectively with local and national organisations has shifted the balance from direct implementation towards partnering in some contexts. This includes funding for effective partnership practices in protracted crises and through mixed international and national actor consortia. Intermediaries are winning or losing funding applications based on their approach to supporting local partners.²⁶ When requirements around effective partnership and funding practices have worked, they have included a mix of overarching requirements or incentives, including funding and contextually specific aspects according to organisation and crisis type. When they have been effective, they have supported the desired change, rather than been perceived as a 'tick box' exercise, and have been undertaken by donors with capacity to critically appraise the activities and plans of their intermediary partners.²⁷

"[Re transition to a partnering approach] There isn't much incentive for this unless there is funding and resources for this, unless intermediaries themselves see it as an important initiative."²⁸ (National actor)

"I do think that if we do want people to shift there would have to be some sort of carrot or stick. That has to be coupled with assertive willingness on the part of the donors looking at the ways in which they are contributing to this."²⁹ (INGO representative) Incentives have also been created from the local and national levels upwards. Local organisations and consortiums are beginning to successfully challenge established business models by determining which intermediary organisation they want as partners. Their power to choose is a powerful incentive for changed practice and is happening in multiple contexts.³⁰ For example, in Somalia, a consortium of local NGOs could not directly access donor funding, but as a collective held considerable power as program implementers. They came together to choose the international partner they wanted to work with, and were successful in the application process.

"We looked for the most appropriate partner that supports localisation – we see there is some progress in their systems."³¹ (National actor)

"We are in a better position than when we are individual local NGOs ... the best approach that I know so far is when the local actors are united and are together – there is room for negotiation. There is opportunity to negotiate the terms more than when you are alone."³² (National actor)

National regulatory requirements also act a strong incentive for shifts in behaviour. In Asia in particular, national governments are increasingly implementing policy settings that require international organisations to change partnering and implementation practices, such as during the Sulawesi earthquake response in Indonesia in 2019, and for multiple cyclone responses in the Philippines.³³

Intermediaries themselves, including countrybased and other pooled funding mechanisms such as the IFRC's Disaster Relief Emergency Fund (DREF) and START Fund, have established systems and processes that create opportunities for behaviour change. Instituting overall funding targets, encouraging provision of overhead costs, and representation in governance within pooled funding mechanisms have been crucial parts of increasing direct funding to and decisionmaking power of local and national actors.³⁴ For example, the START Fund in Bangladesh ensures that all national and local funding recipients receive equal costs to cover their overheads, and advocates for them to invest the money into capacity development and organisational strengthening.³⁵ There have also been important shifts in setting incentives around capacitybuilding funding, including exploring how this can be done through pooled funds that use partnership modalities.³⁶

Several international organisations and memberbased alliances have developed localisation strategies and policies that inform programming and partnering practices. A localisation strategy and objectives are core parts of Trocaire's 2021–2025 Strategic Plan. ZOA's strategic plan 2019-2022 highlights that its hybrid model will continue to see the organisation working increasingly with and through local and national partners.³⁷ CARE, Oxfam, International Rescue Committee (IRC), Australian Red Cross, the START Network and the Catholic Agency for Overseas Development have also reviewed and changed partnering policies and practices, and developed localisation approaches.³⁸ Alongside improved strategies, organisations have resourced partnership roles or localisation hubs that have incentivised various behaviours by funding new and promising initiatives, profiling and recognising best practice.

The link with accountability - when incentives work

Incentives or requirements do not always work, because they are soft – they are often not mandated and few mechanisms ensure adherence. Accountability is especially weak when it relies on self-assessment and lacks a feedback loop involving local and national partners. Incentives and their accompanying accountability mechanisms are not used consistently or widely enough to encourage significant change.³⁹ This means that incentives are currently only shifting behaviour with those intermediaries and donors that are already motivated to change.

Practical and feasible accountability measures alongside incentives are changing behaviour. Examples include donors requesting that intermediaries submit a plan to work with local actors and discuss it with them; requiring intermediaries to provide quality, flexible funding, including indirect and overhead costs, to national and local actors; requiring reporting on funding amounts and making funding conditional on meeting agreed localisation requirements, indicators or targets.⁴⁰ Public reporting on sectorwide initiatives has increased visibility and impetus for stronger accountability, such as the Charter for Change, the Charter of Accountability developed by local and national NGO endorsers, and Grand Bargain reporting.⁴¹

"I do think that including some sort of accountability in reporting – it accelerates some things when it comes to localisation outcomes. For example, when donors started asking how much we are spending, we started counting it."⁴² (INGO representative)

"They [donors] should demand we report on how much we spent on capacity strengthening."43 (UN representative)

Setting internal metrics, or metrics in collaboration with local partners and donors around partnership and capacity-sharing practices, and requiring these to be reported on as part of contractual agreements, has also shifted behaviours.⁴⁴ These accountability measures are more effective because they are mandated, have a feedback loop to inform practice, and promote bottom-up accountability.

"I think it's a truth that visibility promotes progress."45 (INGO representative)

WHAT INTERVENTIONS WILL ENCOURAGE BEHAVIOUR CHANGE?

Behaviour change is dependent on the creation of clear defaults and incentives that have visible and collective endorsement and support from donors. These must be accompanied by accountability mechanisms that are driven by local partners and utilised by donors.

Change the defaults

"It's seen as a nice add-on rather than mission critical for most intermediaries ... it's about 'how can we completely disrupt that?"⁴⁶ (National actor)

Donors, international, national and local actors should consistently build in a range of default processes that incentivise ideal intermediary practices across programming and partnerships in design, contracting and implementation. The following incentives could be used more effectively and consistently across the system by individual donors. If intended to bring about broader system change, a group of donors could identify one or two incentives in context and collectively agree to apply them across all intermediary relationships.

Default processes in partnership negotiating and contracts: whether intermediaries are signed up to and meeting Charter for Change commitments; how long partnerships with local partners have existed; questions around to what extent has the local organisation been involved in the design and grant allocation or budget allocation; questions around involvement of local partners in decisionmaking.

- Standardised targets on indirect cost recovery and overhead costs for national and local partners that is accounted for in financial reporting.
- Donors requiring intermediaries to pass on at least 25% of funding that is accounted for in financial reporting.
- Donor-resourced budget for institutional capacity support to local partners.⁴⁷ For intermediaries able to demonstrate particularly strong practice in this area, there could be access to an additional pot of money earmarked for appropriate, relevant and prioritised capacity-building.
- Preferred supplier pools: intermediaries who are partnering effectively could go into a preferred pool of suppliers or continue to receive funding for effective partnership practices.⁴⁸

Mold intermediaries accountable

"Intermediaries need to be incentivised and must be accountable. Whether you keep getting funding should be dependent on how you are working in [the] localisation space."49 (International actor)

"For accountability, there has to be a common understanding as how to prioritise those who have better engagement with local partners over those who have less, as this will itself lead to more accountability and more localisation."⁵⁰ (National actor)



Behavioural science principle

Defaults: Default options are pre-set courses of action that take effect if nothing is specified by the decision-maker. Setting defaults is an effective nudge when there is inertia or uncertainty in decision-making.

Accountability that is driven and informed by local and national actors could create transformational change. Local and national actors should play a far more prominent role in holding intermediaries accountable.⁵¹ Systems and processes could be put in place to give more power to local and national actors to choose who they would like to work with and inform donor decision-making on funding.

Incentives, default and accountability processes need to be applied collectively and more consistently to drive behavioural change. In addition to the evidence presented above, most participants felt that incentives and linked accountability processes were critical to shifting the status quo.⁵²

The following actions could be taken to initiate this type of change.

Establish and use processes for local actors to provide direct feedback and assessments of their international partners to inform programming and funding decisions. Enable local actors to form direct relationships with donors. This may require donors to pilot a partnership or localisation point person in country with sufficient authority to influence funding decisions.

- Support and encourage initiatives that promote accountability to national and local partners, such as independent assessments of intermediary partnering practices, publicly available scorecards, or TripAdvisor-type ratings systems that could function as an effective reputational incentive.⁵³
- Support the creation of local and national actor consortiums and encourage them to seek out and identify their preferred intermediary organisations if they cannot be resourced directly.
- Engage national peak bodies or national consultants to review or evaluate intermediary practices in context. Act on the findings and recommendations with respect to future funding.



Behavioural science principle

Feedback: Feedback is an effective tool for promoting efficient behaviour: it enhances individuals' awareness of the consequences of their choices in complex settings.

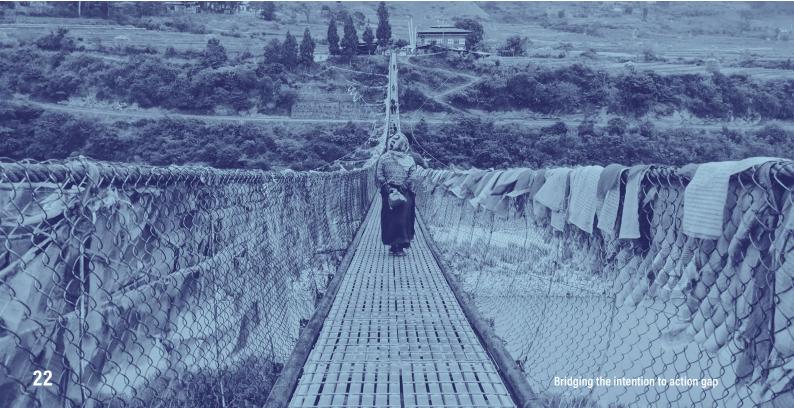


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BEHAVIOUR CHANGE IN MOTIVATION



Hypothesis tested throughout the research

If intermediaries believe they have an ongoing role in humanitarian action and can clearly define that long term role, then they are more likely to actively support the contribution of local and national actors.

If we start with the proposition that intermediaries empower local and national organisations to drive, define and deliver principled humanitarian responses to needs in their communities, then the key question we need to answer in relation to motivation is:

How motivated are donors and organisations to empower local and national organisations?

"If intermediary organisations were not only competent enough, but committed enough, localisation will happen. Intermediary organisations need to fix their orientation."⁵⁴ (National actor)

This research found clear evidence that organisations who have defined their complementary role, and believe that they have an ongoing positive or transformational role as an intermediary, are more likely to support the contribution of local and national actors. Those with a demonstrable ethos and culture around partnering and defining their value-add were much clearer about their motivation.⁵⁵ This was often articulated through organisational strategies and policies, resourcing, and investment into effective partnership approaches and internal and external accountability processes (as outlined in the section above).

"There is a growing wave of awareness that this is absolutely crucial ... it is something we need to engage in or we lose relevance."⁵⁶ (INGO representative)

Embarking on intentional strategic processes is critical to create motivation and ensure accountability. For example, this has been transformational within the Australian Red Cross, whose International Programs department strategically reorientated and downsized its team and simultaneously upskilled National Society staff to support locally led humanitarian action in Asia and the Pacific.⁵⁷ Trocaire has also embarked on a strategic approach to localisation that promotes its continuing critical role in the sector as a partner-based organisation.⁵⁸

This was also the case for donors who had articulated and piloted ways of supporting localisation through intermediaries, and outlined clear localisation priorities.⁵⁹ Such donors promoted more complementary roles between intermediaries and local and national partners. For example, SIDA has articulated localisation objectives in its humanitarian strategy, and selected strategic partners that align with this focus.⁶⁰

Organisations that have traditionally had a far larger role in direct implementation, and a smaller partnering role, are less clear about the motivation for acting as an effective intermediary and supporting local and national actors. For example, some traditional humanitarian INGOs (rather than those that also undertake development programming), as well as some UN agencies, did not feel they needed to make seismic shifts in their approaches. This was due to their belief in their role, and identity, as direct implementers of humanitarian action.⁶¹

"One of the issues is that all international organisations are invested in their future, so they might not be motivated to make changes. Also, playing the intermediary role can be new and this role may not be defined for some of them."⁶² (UN representative)

Examples also showed that when donor pressure was not being applied to these organisations, the motivation to shift was even lower.⁶³ Currently the shift is perceived as a loss for these organisations, with no clear associated benefits.

"A number of intermediaries are not open yet to this change; they are not looking at this change as positive because it goes with a perceived loss on their side."⁶⁴ (Donor representative)

Leadership is critical in determining organisational motivation. Where senior individuals were advocates for reorienting the status quo, there was a direct correlation with changed behaviours and approaches⁶⁵ and vice versa; an absence of leadership at organisational or country level reduced scope for change.⁶⁶ Evidence also suggests many stakeholders saw donors as leading on motivating change, and that an absence of combined leadership from donors had stagnated progress.⁶⁷

Finally, motivation is strongly connected to evidence of impact and the perceived

ability of local and national actors to deliver improved programs whilst managing risk and upwards accountability.⁶⁸ In organisations that documented evidence as to how localised approaches can support better delivery and appropriate aid, alongside the complementary role of the intermediary, stronger motivation for further change was apparent. For example, CARE undertook a review of its partnership response to Tropical Cyclone Gita with MORDI, a Tongan NGO, which showed how CARE can better support localised responses in future.⁶⁹ Similarly, Oxfam compiled examples of local humanitarian leadership to help the organisation learn, adapt and improve its support for locally led action.⁷⁰

There are also examples of successful reorientations of approaches to risk management that are beginning to demonstrate the potential of local and national actors to operate effectively in this space. The OCHA-led Humanitarian Access Working Group is an example of a shared approach to security risk management in Syria. It enables local and national NGOs to raise risk concerns as a group, therefore also mitigating the risk of harassment of individual organisations by armed actors.⁷¹ However, these examples are small in scale, and most measurement processes document the progress of localisation rather than its impact. In the absence of stronger evidence of consistent and visible benefits, many in the sector will remain unmotivated to change approaches; more evidence is needed to energise a broader group of stakeholders.72

"There is still a need to present solid evidence as to why localisation is a better agenda for the delivery of humanitarian assistance"⁷³ (International actor)

When an evolution becomes a revolution: the cash blueprint

Evidence from other change processes in the humanitarian sector demonstrates how motivation for change can be created and sustained at scale. The cash revolution has been one of the major shifts in humanitarian programming in recent decades. Despite cash having been used for several decades in some cases, significant progress in normalising cash responses has been made over a relatively short period of time. Cash has become the default response modality in many contexts. It can provide a blueprint for approaches to promote more effective intermediary practices.⁷⁴

In its early years, cash transfer programming was met with hesitance and reluctance across the sector. As with increased financing to local actors, a lack of evidence, perceptions of significant risk, and assumptions about misuse of funds restricted progress. This narrative has shifted, thanks to strong evidence of the effective and efficient use of cash as a priority intervention. Donors have also invested in the cash agenda to stimulate progress, for example, through secondments into agencies to drive the cash agenda and funding research into various elements of cashbased programming. A combination of compelling evidence and strategic communications contributed to a doubling in the use of cash as a form of humanitarian assistance over 2016–19. Moreover, support

for cash has demonstrably increased, with 91% of practitioners reporting increased donor support for cash responses and 85% believing it is being considered more systematically as a response modality.⁷⁵

Our research showed that changes in donor practices contributed to behavioural shifts, in particular through creating new defaults (see Section 3). In proposal templates, request from donor' (such as DFAT) for justification of non-cash responses prompted the response *"if not cash, why not?*".⁷⁶ Major government donors, including EU/DG ECHO, Germany, Norway, Sweden, Switzerland, the United Kingdom and the United States, have also come together in an effort to strengthen donor coordination on humanitarian cash transfer programming.⁷⁷

What takeaways are there for motivating the effective role of intermediaries?

Significant advances in the cash agenda show that a) change in practices at scale in the humanitarian system is possible; b) a strong evidence base, that addresses risk concerns and highlights effective and efficient delivery of aid, supports changes in policy and practice; c) donor defaults contribute to uptake of priorities; and d) joint donor approaches promote progress towards shared objectives.

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WHAT INTERVENTIONS WILL ENCOURAGE BEHAVIOUR CHANGE?

Behaviour change is dependent on clarifying the goals and benefits of localisation and demonstrating irrefutable progress towards it.

Make the goal and associated benefits visible and powerful

"There is still [a] need to present solid evidence [as to] why localisation is a better agenda for the delivery of humanitarian assistance."⁷⁸ (National actor)

Clear and consistent direction and messaging that articulates the importance of and expectations of the intermediary role would motivate behaviour change. A consolidated approach from donors would clarify priorities and approaches and therefore increase motivation. Donors and intermediaries should continue to generate and document evidence about the benefits of locally led humanitarian action. Frequently communicating the growth in evidence and the progress in the sector towards the collectively articulated goal will also provide a sense of momentum and progress.

The following actions could be used to support this change:

Agreeing on collective donor messaging on the ultimate goal, the importance of intermediary roles and the associated benefits of shifting from the status quo

- Supporting the generation of evidence on the benefits of localisation, and ensuring that shifts in policy and practice are linked to a strong evidence base that demonstrates rationale and value
- Exploring and building up an evidence base on more nuanced approaches to risk that could help reduce major perceived barriers.⁷⁹

Create and communicate a sense of momentum

Evidence that more and more intermediaries are shifting their behaviour creates a sense that the sector is transforming and those not on board will get left behind. This can be a powerful motivator.

The following actions could be used to support this change:

- Tracking and documenting the dynamic social norm over time, e.g., the proportion of funded partners passing on funding to local and national actors
- Communicating changes and profiling best practice, e.g. "Over 40% of intermediaries are allocating overhead budget lines to local actors because it supports a more effective role for local and national actors in their own communities." "Other donors expect reporting on how much funding is reaching local partners because they know that it reflects improved partnership practices and strengthens the impact of their aid dollars."



Behavioural science principles

Goal gradient theory: People will work harder to achieve a goal the closer they get to it.

Dynamic social norms: When people are informed about an increasingly strong behavioural norm, there is a tendency to follow the momentum and behave in the same way.

BEHAVIOUR CHANGE IN CAPABILITY



Hypothesis tested throughout the research

If tools and approaches support the identification of 'fit for purpose' intermediary roles according to organisational mandate and context, then organisations can better support locally led humanitarian action in an appropriate and complementary way.

If we start with the proposition that intermediaries empower local and national organisations to drive, define and deliver principled humanitarian responses to needs in their communities, then the key question we need to answer in relation to capability is:

What capabilities, knowledge and skills do intermediaries require to effectively empower national and local organisations to drive, define and deliver principled humanitarian responses?

The capabilities, knowledge and skills required for an effective intermediary role differ quite considerably from what currently exists in many international organisations. Organisations that have made, or are making, the shift to more intermediary functions than direct implementation functions are clear about the changes and investment needed to build new competencies.⁸⁰

"There is a very different approach and skill set needed; there is a very different skill set to someone who is delivering programs versus someone who can support and partner with local organisations."⁸¹ (International actor)

Research participants confirmed that the capabilities required for an effective intermediary role, based on an initial review of existing literature for this research project and captured in the model below (Figure 5), are critical.⁸² The role of an effective intermediary in supporting locally led action has six interlinked components. Of these, capacity-strengthening generated the most evidence and discussion; participants highlighted the need for greater focus on the appropriateness of capacitystrengthening, and a shift towards capacitysharing. A shift is required away from blanket approaches to capacity-strengthening to more contextualised support that may be more appropriately provided via mentoring.⁸³ This also requires an intentional process of thinking through and articulating what can and should be incorporated within a humanitarian context versus a development context.

In addition to the endorsed capabilities, two other critical areas emerged. Brokering was frequently raised as an important capability; intermediaries can broker relationships between local organisations and entities, adding value to their roles.⁸⁴ This was raised in terms of brokering relationships with donors but also with technology providers, and specialist organisations with services such as communications and events management.85 Advocacy was also raised as an important intermediary role. It was largely connected with the idea that intermediaries can advocate for local leadership at a generic level, but also specifically for increased access to funding and decision-making forums.⁸⁶ Finally, in more complex contexts, remote management capabilities have become vital.87



Figure 5 Proposed model for the ideal role and capabilities of intermediaries

Underpinning the model:

- Strong, equitable and long-term partnerships and relationships that support locally-led humanitarian action
- Analysis of relevant contextual factors that determine the most appropriate mix of components of the model

The fit-for-purpose intermediary role

Our overarching capability hypothesis is that the combination of capabilities needs to be fit for purpose. This suggests that the appropriate mix of capabilities (e.g. how much focus should be put on due diligence versus technical support) will depend on the context, mandate and value-add of the organisation, and – critically – the requirements and requests of the partner organisations.

The research strongly supports the fit-forpurpose framing. The context influences which capabilities will be most appropriate, and in what proportions. The capacities of the local and national partners will determine how intermediary actors can behave in a complementary way;⁸⁸ the context will determine what capabilities may be most critical (e.g. in a conflict versus a disaster context).⁸⁹

"Complementarity is not static."90 (INGO representative)

The research further supports the idea that the fit-for-purpose role must be intentionally evaluated and articulated. Part of this process should interrogate organisations' areas of expertise and value-add in their partnerships, as well as the timeframe of their relationships and interventions. Some organisations have done this, providing context-specific strategies and action plans.⁹¹ In particular, pooled funding mechanisms have defined these specific capabilities and their fit-for-purpose role clearly in many contexts. There is evidence that donors are increasingly requesting plans that help intermediaries to think about the role they play and the capabilities they will need; these may be developed as a localisation strategy or an exit strategy. We found evidence that this articulation would be welcomed, and would help provide accountability for gaps between intention and action, especially in more complex humanitarian contexts, where a fitfor-purpose role can challenge the idea that local humanitarian action is not appropriate or possible. 92

"There should be that debate on evaluating their [intermediary] fit-for-purpose role, what value add they [intermediaries] are bringing on board ... Donors should ask intermediaries, how are you shifting?"⁹³ (National actor)

There was considerable support for the idea of generating more coordinated approaches to assessing capacity so that intermediaries could collaborate to build and share capacity.⁹⁴

"We conduct institutional capacity assessments – it's not coordinated, we try to strengthen them [local organisations] but we do it disjointedly. We should bring all partners together to do this – it needs to be collective and better coordinated; we need a joint approach in supporting partners."⁹⁵ (INGO representative)

Participants also raised some interesting ideas with respect to intermediary and donor capability. For example, participants suggested that in certain pilot countries donors could expand their local in-country resources. This could involve providing more staff to enable them to more actively engage with local and intermediary actors, acknowledging that more partnerships often require a higher workload.⁹⁶

Some organisations have found it valuable to have specific roles responsible for partnership or localisation.⁹⁷ Oxfam adopted this model in several countries by engaging partnership managers to advocate for partners. Partnership managers could be given the resources and time to develop fit-for-purpose models in different contexts.

There is also a reasonable amount of evidence that a consortium of intermediary partners or a mechanism such as a localisation hub or a pooled fund is the best way to consolidate all the capabilities required to partner effectively.⁹⁸ If properly resourced and guided by a clear strategy to enable the role of local and national actors, then these intermediary mechanisms could support a more appropriate and coordinated supply of capabilities that can be contextualised. Local actors working in consortiums are best placed to define the valueadd that they are seeking from an intermediary, as opposed to operating in isolation or trying to influence the behaviour of intermediaries on their own.⁹⁹ These coordinated approaches shift the power from the intermediary defining their role and capability offerings to a local and national consortium of actors defining the role needed and selecting the intermediary that best provides required capabilities.

Pooled funding mechanisms – supporting fit-for-purpose roles in context

Pooled funding mechanisms play an important and growing role in coordination, decentralising authority and funding national and local organisations directly. The research highlighted several examples of pooled funds supporting locally led humanitarian action and specifically delivering an appropriate mix of capabilities to local and national partners via a mix of funding, capacity support and compliance. The Start Fund Bangladesh is the first multi-donor pooled fund managed exclusively by NGOs, with INGOs and local NGOs making decisions and allocating funding. In Pakistan, START-managed funds have funded local organisations and harmonised approaches to compliance and capacity support; the Concern Worldwide-managed RAPID fund in Pakistan now includes a capacity-building component for local organisations identified as key partners in high-risk areas. Respondents across various contexts recommended an expanded mandate for pooled funds to support longer-term engagement and capacity-building past short-term activations and emergencies.¹⁰⁰ The Red Cross Red Crescent Movement National Society Investment Alliance is a demand-led fund managed by the IFRC and ICRC. The fund supports the development of organisational and operational capacities, increasing their longterm sustainability as principled and effective local actors. Investment areas include financial sustainability, program strengthening, leadership development and governance and systems strengthening.¹⁰¹

"When we talk about humanitarian responses, including in pooled funding, the process gets about six months to a year for the whole project cycle, so I doubt it gets enough time for designing and delivering capacity-building. Potential solutions can be identifying standby emergency partners and building their capacities over time before they get engaged in the response."¹⁰² (UN representative)

WHAT INTERVENTIONS WILL ENCOURAGE BEHAVIOUR CHANGE?

Behaviour change is dependent on intermediaries engaging in, and donors encouraging, an intentional process of articulating their fit-for-purpose roles in specific contexts.

Determine the fit-for-purpose role

International organisations in many contexts continue to default to direct implementation without considering whether an intermediary role is more important and appropriate. Even where an intermediary role may be appropriate, organisations often default to a predetermined way of working with partners based on their own capabilities. This research highlights that there is a need to break these defaults through an intentional and considered process to determine fit-for-purpose roles that adapt to context and can be interrogated by partners and donors alike. The following ideas could be used to support this change:

Develop a clear strategy or plan that articulates a fit-for-purpose or complementary intermediary role, by context, and share with donors. In many ways, the final product is not as important as the intentional process to articulate the value-add and allow local and national actors to hold intermediaries accountable.

- Employ or resource partnership brokers or managers who can analyse and articulate the complementary role the organisation can play, and the combination of capabilities it requires.
- Support consortiums of local and national organisations to articulate the combination of capabilities that would most effectively support their role in context, and empower them to select the intermediaries most likely to support these priorities.



Invest in pooled funding mechanisms that empower local and national actors

Pooled funds are well placed to deliver fit-forpurpose capabilities in complex contexts, as evidenced in this research. They are particularly effective as intermediaries if local and national organisations have meaningful engagement in fund management and decision-making.

Advocate for and fund pooled mechanisms that articulate an intention to empower the role of national and local organisations and have established processes to promote capacity exchange.

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SECTION 4: CONCLUSION

Since the World Humanitarian Summit, the localisation discussion has evolved considerably. The debate has become more nuanced in many ways, and with respect to intermediaries, the discussion has become less polarised and more constructive. This research paper contributes further to the constructive direction, by recognising that intermediaries have a role, but suggesting that **their future role must differ substantially from the status quo.**

The envisaged role is intermediaries empowering local and national organisations to drive, define and deliver principled humanitarian responses to needs in their communities.

This will only be achieved if there is progress across all three areas of opportunity, motivation and capability. To date, much of the effort and thinking in the sector has focused on capability – the skill sets and capacities needed to fund and manage a brokering and partnership role between local actors and donors. This has allowed intermediaries to focus in a very practical space, for example, creating tools and approaches for partnership, which – whilst valuable – will not shift practice unless accompanied by motivation for change and real opportunities in context. For behaviour change to happen, there must be intentional change in opportunity, motivation and capabilities. Across all three change areas, the barriers and the solutions lie in salience: **a visible and valued role that resonates across the system and makes sense to donors, international, national and local organisations alike.** Currently, the barriers preventing change loom much larger than the triggers that will motivate change. Defaults and incentives are inconsistent and not accompanied with accountability for change. Motivation is not driven by a clear shared goal and understanding of the benefits of reaching the goal; organisations cannot see the reason to shift their role.

A behavioural science objective for this study was to understand how intermediaries can empower national and local organisations to define and deliver principled humanitarian responses to needs in their communities. This study has shown that most organisations cannot see how to achieve this objective. However, some donors, international, national and local organisations are paving the way, developing approaches and creating a dynamic social norm that will encourage further action. In learning from these innovative leaders, their peers, and insights from behavioural science, we have developed the following intervention ideas to encourage desired behaviours.



Behavioural science principles

Salience, or prominence, is critical. The fundamental problem with efforts to influence desired intermediary behaviours is that the barriers are far more salient than the motivators: they attract more attention, making them more influential in perpetuating the status quo.

Dynamic social norms: When people are informed about an increasingly strong behavioural norm, there is a tendency to follow the momentum and behave in the same way.

RECOMMENDED INTERVENTIONS

The following are the recommended interventions across opportunity, motivation and capability that are most likely to support change.

Mill Change the defaults

Donors, international, national and local actors should consistently build in a range of default processes that incentivise ideal intermediary practices across programming and partnerships in design, contracting and implementation. Examples include default processes in partnership negotiating and contexts, preferred supplier pools, standardised targets for quality funding, standardised resourcing of institutional capacity-building and sharing, and accountability for meeting existing targets.

Mold intermediaries accountable

Accountability driven and informed by local and national actors could create transformational change. Local and national actors should play a far more prominent role in holding intermediaries accountable. Examples include establishing processes for local actors to provide direct feedback and assessments of international partners, and to inform funding decisions; supporting and encouraging initiatives that promote accountability to national and local partners; and supporting the creation of local actor consortiums to strengthen their choices and decision-making power.

Make the goal and associated benefits visible and powerful

Clear and consistent direction and messaging that articulates the importance and expectations of the intermediary role would motivate behaviour change. A consolidated approach from donors would clarify priorities and approaches and therefore increase motivation. Donors and intermediaries should continue to generate and document evidence about the benefits of locally led humanitarian action. Frequently communicating the growth in evidence and the progress in the sector towards the collectively articulated goal will also provide a sense of momentum and progress.

Create and communicate a sense of momentum

Evidence that more and more intermediaries are shifting their behaviour creates a sense that the sector is transforming and those not on board will get left behind. This can be a powerful motivator. This could be achieved by tracking and documenting the dynamic social norm over time – e.g. what proportion of funded partners passes on funding to local and national actors – and communicating changes and profiling best practice.

Determine the fit-for-purpose role

International organisations in many contexts continue to default to direct implementation without considering whether an intermediary role is important and appropriate. Even when an intermediary role may be appropriate, organisations often default to a predetermined way of working with partners based on their own capabilities. This research highlights that there is a need to break this default, through an intentional and considered process to determine fit-for purpose roles that adapt to context and can be interrogated by partners and donors alike.

Invest in pooled funding mechanisms that empower local and national actors

Pooled funds are well placed to deliver fit-forpurpose capabilities in complex contexts. They are particularly effective as intermediaries if local and national organisations have meaningful engagement in fund management and decision-making.

ENDNOTES

- 1 Research participant responses.
- 2 Interviews 1, 2, 7, 9, 10, 11, 12, 15, 19, 20, 21, 23, 29, 30, 32, 34, 35, 36, 37, 38-40, 43, 44, 46, 48, 53, 55, 56, 59
- 3 Interviews 1, 2, 7, 9, 10, 11, 12, 15, 19, 20, 21, 22, 23, 24, 29, 30, 32, 34, 35, 36, 37, 38-40, 43, 44, 46, 48, 52, 53, 54, 57, 59, 64

The Grand Bargain's Independent Annual Report has consistently noted progress in some areas of the localisation agenda, but other studies and reports have noted major gaps in areas, recommending for example more support for local actors to maximise their role and the provision of more quality funding and support to equitable partnerships. See for example:

Charter for Change, Progress Report 2019-20. (https://charter4change.files.wordpress.com/2020/09/ c4c_progressreport_2020.pdf); Humanitarian Advisory Group and NIRAPAD, Elevating evidence: Localisation in the 2019 Bangladesh flood response, 2019. (https://humanitarianadvisorygroup.org/ wp-content/uploads/2020/04/Elevating-Evidence_Localisation-in-the-2019-Bangladesh-floodresponse_Final_electronic.pdf); CHS Alliance, Humanitarian Accountability Report, 2020. (https:// www.chsalliance.org/get-support/resource/har-2020/); C. Els, Funding to local actors still far from Grand Bargain Commitments, 2019. (https://www.local2global.info/research/the-humanitarianeconomy/gb19).

- 4 Interviews 1, 2, 3, 4, 11, 43 Workshops 1, 2 and 3
- 5 Some actors reflected that they use different terms to describe the role of organisations acting in an intermediary role, although most organisations who act in that role, as well as local and national actors, consistently use the term.
- 6 See <u>https://gblocalisation.ifrc.org/grand-bargain-localisation-workstream-2/</u> for further information.
- 7 RDI Network and ACFID, Principles and Guidelines for Ethical Research and Evaluation, 2016 Australian Council for International Development's (ACFID) guidelines on conducting ethical research (<u>https://rdinetwork.org.au/effective-ethical-research-evaluation/principles-guidelinesethical-research-evaluation/</u>)
- 8 The OECD Directorate for example has used behavioural insights in addressing environmental issues including energy, water and food consumption, transport and car choice, waste management and resource efficiency and compliance with regulations. See OECD, Tackling Environmental Problems with the Help of Behavioural Insights, OECD Publishing, Paris, 2017. (<u>http://dx.doi.org/10.1787/9789264273887-en</u>); Behavioural insights have also been used in the health context to reduce over-prescription of antibiotics, see M. Hallsworth et al., 'Provision of social norm feedback to high prescribers of antibiotics in general practice: a pragmatic national randomised controlled trial,' The Lancet, 387 (2016): 1743-1752. Doi: 10.1016/s0140-6736(16)00215-4.
- 9 Michie, S. van Stralen, M. & West, R (2011). The Behaviour Change Wheel: A new method for characterising and designing behaviour change interventions. Implementation Science, 6(1): 42.
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- 11 Interviews 20, 21, 22, 24, 25, 26, 27, 28, 32, 44, 48
- 12 Interview 21
- 13 Interviews 1, 2, 7, 9, 10, 11, 12, 15, 19, 20, 21, 23, 29, 30, 32, 34, 35, 36, 37, 38-40, 43, 44, 46, 48, 53, 55, 56, 59
- 14 Interviews 1, 2, 7, 9, 10, 11, 12, 15, 19, 20, 21, 22, 23, 24, 29, 30, 32, 34, 35, 36, 37, 38-40, 43, 44, 46, 48, 52, 53, 54, 59
- 15 Interviews 2, 7, 9, 12, 13, 22, 31, 38-40, 42, 44, 45, 48, See barriers relating to opportunity outlined in: Accelerating Localisation through Partnerships: Recommendations for operational practices that strengthen the leadership of national and local actors in partnership-based humanitarian action, 2019. (https://www.christianaid.org.uk/resources/about-us/accelerating-localisation-report-globalsummary); C. Schmalenbach, Christian Aid et al., Pathways to localisation: A framework towards locally-led humanitarian response in partnership-based action, Accelerating Localisation through Partnerships, Brussels: ECHO, 2019. (https://reliefweb.int/report/world/pathways-localisationframework-towards-locally-ledhumanitarian-response-partnership

- 16 Interviews 20, 21, 22, 24-28, 34, 36
- 17 For example, through several actors developing whole-of-organisation strategies, shifts towards more and better-quality partnerships with local actors, and an increase in funding more directly to local actors through pooled funds. See Grand Bargain Annual Independent report 2020. (<u>https:// cdn.odi.org/media/documents/Report_Grand_Bargain_annual_independent_report_2020.pdf</u>)
- 18 Interviews 7, 9, 12, 22, 23, 29, 64, Workshops 1, 2 and 3. This issue of lack of evidence is further explored in an upcoming review of evidence on localisation and humanitarian effectiveness conducted by HAG and HPG for the Dutch Government in 2021.
- 19 Interviews 8, 9, 10, 12, 19, 22, 24-28, 50
- 20 Interviews 1, 20, 19, 22, 30, 23, 50 Workshops 1, 2 and 3. For further discussion on this issue, see Coordination Sud, Localisation of aid: Lesson from partnerships between French NGOs and local actors, 2020. (<u>https://forus-international.org/en/resources/128</u>)
- 21 For example, the Accelerating Localisation through Partnerships consortium has documented several effective partnership practices and models across multiple years and contexts, as has Oxfam through the ELNHA initiative, the Shifting the Power initiative, the Missed Opportunities series and reviews of responses (see references above).
- 22 Interviews 24-28, 29, 30; Veronique Barbelet, Rethinking capacity and complementarity for a more local humanitarian action. Overseas Development Institute, 2019. (<u>https://www.odi.org/ publications/11471-rethinking-capacity-and-complementaritymore-local-humanitarian-action</u>); John Bryant, Mapping local capacities and support for more effective humanitarian responses, Overseas Development Institute, 2019. (<u>www.odi.org/publications/16505-mapping-local-capacitiesand-supportmoreeffective-humanitarian-responses</u>)
- 23 See Grand Bargain Localisation Workstream; Guidance note on arrangements between donors and intermediaries. May 2020. (<u>https://gblocalisation.ifrc.org/wp-content/uploads/2020/05/</u> <u>Guidance-note-on-arrangements-between-donors-and-intermediaries-May-2020.pdf</u>)
- 24 Interviews 4, 32, 37; Dutch Relief Alliance Strategy 2018-21
- 25 Interviews 20, 59, FCDO Humanitarian Funding Guidelines for NGOs Applying for CHASE Humanitarian Response Funding, p. 15; Humanitarian Advisory Group and the Myanmar Development Network, Localisation through partnership: Shifting towards locallyled programming in Myanmar (Phase 3 – Outcomes of the transition), 2021. (<u>https:// humanitarianadvisorygroup.org/insight/localisation-through-partnership-shifting-towards-locallyled-programming-in-myanmar-phase-3-outcomes-of-the-transition/</u>)
- 26 Interviews 4, 7, 9, 11, 15, 20, 24-28, 32, 34, 37, 38-40, Workshop 3
- 27 Interviews 3, 5, 11, 34, 36, 37, Workshop 1
- 28 Interview 36
- 29 Interview 31
- 30 Interviews 32, 34, 36
- 31 Interview 34
- 32 Interview 34
- 33 As explored further in HAG and Pujiono Centre, Charting the new norm? Local leadership in the first 100 days of the Sulawesi earthquake response, Humanitarian Horizons Practice Paper Series, 2018. (https://www.alnap.org/help-library/charting-the-new-norm-local-leadership-in-the-first-100-days-of-the-sulawesi-0.); Sabina Robillard et al., "We must be the pioneers" Perspectives on localization in the response to the 2018 Sulawesi earthquake in Indonesia. Boston: Feinstein International Center, Tufts University & Save the Children Denmark, 2020. (https://fic.tufts.edu/wp-content/uploads/FIC-Sulawesi-Indo_4.24.20.Pdf.); Dutch Relief Alliance, Operationalising support to local leadership in Sulawesi, 2019. (https://www.carenederland.org/wp-content/uploads/2019/09/DRA-Final-Localisation-report-final-002.pdf.)
- 34 Interviews 4, 9, 37; Dutch Relief Alliance Strategy 2018-21; Featherstone and Mowjee, Desk review on enhancing the potential of pooled funds for localisation, 2020. This includes the RAPID Fund in Pakistan, the START Fund in Bangladesh and others including UN-managed country-based pooled funds.
- 35 Interviews 25 and 39

- 36 Interviews 4, 6, 20, 37, 38-40, 50; Featherstone and Mowjee, Desk review on enhancing the potential of pooled funds for localisation, 2020.
- 37 ZOA Strategic Plan 2019-2022, (<u>https://www.zoa-international.com/content/uploads/ZOA-strategic-plan-2019-2022-ABRIDGED.pdf</u>)
- 38 Interviews 9, 22, 12, 20, Trocaire, Local Power Global Justice: Strategic Plan 2021-2025, (<u>https://reliefweb.int/sites/reliefweb.int/files/resources/Trocaire-Strategic-Plan-2021-2025.pdf</u>) There is also evidence of some intermediaries such as UNICEF, UNHCR and several INGOs engaging in strategic, organisation-wide efforts to either re-evaluate and redefine their role as intermediaries in supporting locally led humanitarian action. For example: UNICEF, A review of UNICEF's approach to localization in humanitarian action Working Paper, Humanitarian Policy Section Office of Emergency Programmes, 2019. (<u>http://media.ifrc.org/ifrc/wpcontent/uploads/sites/12/2019/11/UNICEF-Oct-2019-Working-Paper-on-localization-.pdf</u>); Executive Committee of the High Commissioner's Programme, Progress towards implementing the Grand Bargain commitments, EC/71/SC/CRP.20, 2020. (<u>https://www.unhcr.org/5f630c5c4.pdf</u>); CARE, Gender & Localising Aid: The potential of partnerships to deliver, 2017. (<u>https://www.care-international.org/files/files/publications/Gender_and_Localizing_Aid_high_res.pdf</u>).
- 39 Interviews 12, 14, 24-28, 35, 36, 38-40, Workshops 1, 2 and 3
- 40 Interview 34, Workshop 3
- 41 For example, see Charter of Accountability (<u>https://charter4change.org/coa/</u>)
- 42 Interview 12
- 43 Interview 1
- 44 For example, Trocaire has established a localisation hub in Kenya to support progress in this area across the organisation. Interviews 4, 7, 9, 11, 15, 20, 24-28, 32, 34, 37, 38-40, 64 Workshop 3
- 45 Interview 12
- 46 Interview 34
- 47 Interviews 1, 35, 43, 50
- 48 Interviews 1, 4, 8, 12, 18, 35, 37, 43, 46, 47, 40
- 49 Interview 18
- 50 Interview 44
- 51 Interviews 1, 2, 3, 4, 11, 43 Workshops 1, 2 and 3
- 52 Interviews 18, 30, Workshop 1, 2 and 3
- 53 Interviews 3, 4, 5, 12, 15, 16, Workshop 1, 2 and 3
- 54 Interview 49
- 55 Interviews 7, 9, 12, 22, 23, 29, 64, Workshops 1 and 2
- 56 Interview 5
- 57 Interviews 22, 42
- 58 Interview 20 (<u>https://www.trocaire.org/sites/default/files/resources/policy/partnership_in_practice_-</u> <u>steps_to_localisation_web.pdf</u>)
- 59 Interviews 8, 41, 54, 59
- 60 Interview 8
- 61 Interviews 5, 30, 12
- 62 Interview 64
- 63 Interviews 5, 30
- 64 Interview 63
- 65 Interviews 9, 33, 36, 38, 40
- 66 Interview 36
- 67 Interviews 31, 10, 14
- 68 Interviews 2, 50, 11
- 69 Interview 23; CARE, Tropical Cyclone Gita Response Evaluation, 2018 (<u>https://www.careevaluations.</u> org/evaluation/tropical-cyclone-gita-response-program-evaluation/)
- 70 Interview 12, (<u>https://oxfamilibrary.openrepository.com/bitstream/handle/10546/621187/er-power-of-local-action-290420-en.pdf;jsessionid=ACC33117BC9AEB6EC0E5CB328567DB62?sequence=1</u>)
- 71 (<u>https://gisf.ngo/resource/partnerships-and-security-risk-management-from-the-local-partners-perspective/</u>)

- 72 Interviews 2, 15, 50, Workshop 1, 2 and 3; For example, existing measurement frameworks and processes largely focus on process rather than impact on humanitarian outcomes. See the START Network's Seven Dimensions of Localisation, the NEAR Network's Localisation Performance Measurement Framework and the HAG and PIANGO Localisation Framework, as well as Charter for Change and Grand Bargain reporting. This issue of lack of evidence is further explored in an upcoming review of evidence on localisation and humanitarian effectiveness conducted by HAG and HPG for the Dutch Government in 2021.
- 73 Interview 50
- 74 Interviews 9 and 11, Workshop 1
- 75 https://www.calpnetwork.org/wp-content/uploads/2020/07/SOWC2020-Executive-Summary.pdf
- 76 DFAT Humanitarian Strategy, Guidance Note: Cash Transfers. December 2017. (<u>https://www.dfat.gov.au/sites/default/files/cash-transfers-dfat-humanitarian-strategy-guidance-note.pdf</u>)
- 77 <u>https://www.calpnetwork.org/fr/publication/joint-donor-statement-on-humanitarian-cash-</u>transfers/
- 78 Interview 50
- 79 Workshops 1, 2 and 3
- 80 Interviews 4, 5, 9, 36, 31, 30, 43
- 81 Interview 36
- 82 Interviews 18, 19, 24-28, 29, 30, 32, 33, 36, 37, 42, 44, 50

Quality funding – Evidence, commitments, guidance and recommendations that highlight the importance of quality funding through intermediaries:

The Grand Bargain; the Charter for Change; the Localisation Workstream Guidance Note on Humanitarian financing for local actors; Els, C. and Carstensen, N. (2015) Funding of local and national humanitarian actors. local to global protection (<u>https://www.local2global.info/wp-content/</u><u>uploads/l2gp_local_funding_final_250515.pdf#</u>)</u>; Andy Featherstone and Tasneem Mowjee, Desk Review on Enhancing the potential of pooled funds for localisation. Oxfam. 2020. (<u>https://</u><u>resourcecentre.savethechildren.net/node/18276/pdf/final_gbw2_pooled_funding_for_localisation.</u> pdf); NRC, Field perspectives on multi-year funding and planning: how theory has translated into practice in Jordan and Lebanon. Oslo: NRC, 2019. (<u>https://www.nrc.no/resources/reports/fieldperspectives-on-multi-year-humanitarian-funding-and-planning/</u>); B. Willitts-King, Funding to local humanitarian actors – evidence from Somalia and South Sudan, HPG Policy Brief 73. London: ODI, 2018. (<u>www.odi.org/publications/11211-funding-local-humanitarian-actors-evidence-somaliaand-south-sudan</u>).

Capacity support – Evidence, guidance and recommendations that highlight the importance of locally relevant and targeted capacity support include:

Christian Aid et al., Accelerating Localisation through Partnerships: Recommendations for operational practices that strengthen the leadership of national and local actors in partnershipbased humanitarian action, 2019. (https://www.christianaid.org.uk/resources/about-us/ accelerating-localisation-report-global-summary); Featherstone, A. (2017) Time to move on: national perspectives on transforming surge capacity. CAFOD, Christian Aid, Tearfund and Islamic Relief Worldwide (<u>https://www.christianaid.org.uk/sites/default/files/2017-09/Time-to-move-on-</u> humanitarian-surge-study-apr2017.pdf); Grand Bargain Localisation Workstream Guidance Note on Capacity Strengthening, (<u>https://gblocalisation.ifrc.org/wp-content/uploads/2021/03/</u> GB-Localisation-Workstream-Country-Level-Dialogue-Resource-Kit-1.pdf); Veronique Barbelet, As local as possible, as international as necessary: understanding capacity and complementarity. in humanitarian action, 2018, HPG Working Paper. London: ODI (www.odi.org/publications/11238local-possible-international-necessary-understandingcapacity-and-complementari+B122tyhumanitarian); Veronique Barbelet, Rethinking capacity and complementarity for a more local humanitarian action. Overseas Development Institute, 2019. (https://www.odi.org/ publications/11471-rethinking-capacity-and-complementaritymore-local-humanitarian-action); Koenraad Van Brabant and Smruti Patel, Localisation in practice: Seven dimensions of localisation emerging indicators and practical recommendations, DEPP and the Global Mentoring Initiative, 2018. (https://reliefweb.int/sites/reliefweb.int/files/resources/Localisation-In-Practice-Full-Report-v4. pdf).

Risk sharing – Evidence, guidance and recommendations that highlight the importance of risk sharing approaches and risk management in support locally led action include: Stoddard et al., NGOs and risk: managing uncertainty in local-international partnerships, 2019. (https://www.humanitarianoutcomes.org/publications/ngos-risk2-partnerships); GISF, Partnerships and Security Risk Management: from the local partner's perspective. Global Interagency Security Forum (GISF), 2020 (https://www.almap.org/ ((https://www.almap.org/ (https://www.almap.org/ ((<a h

For evidence, guidance and recommendations on the role of intermediaries in supporting due diligence, compliance, accountability, quality assurance, operational support and technical backstopping, see: Localisation Workstream Guidance Notes on Humanitarian financing for local actors and Gender-responsive localisation; NEAR Network Localisation Performance Measurement Framework, 2017. (https://resourcecentre.savethechildren.net/library/localisation-performancemeasurement-framework); OECD, Localising the response, Commitments into Action Series, 2017. (https://www.oecd.org/development/humanitarian-donors/docs/Localisingtheresponse.pdf); Smruti Patel and Koenraad Van Brabant, The Start Fund, Start Network and Localisation, The Global Mentoring Initiative and START Network, 2017. (https://start-network.app.box.com/s/3hs0 9ryakami7n8hiliaruaaw9ycir4r); Veronique Barbelet, Rethinking capacity and complementarity for a more local humanitarian action. Overseas Development Institute, 2019. (https://www.odi.org/ publications/11471-rethinking-capacity-and-complementaritymore- local-humanitarian-action); V. De Geoffroy and F. Grunewald, More than the money – Localisation in practice, Trocaire, 2018. (<u>https://www.trocaire.org/sites/default/files/resources/policy/more-than-the-money-localisation-</u> inpractice.pdf); Humanitarian Advisory Group and PIANGO, Localisation Measurement Framework, 2019, (https://humanitarianadvisorygroup.org/insight/measuring-localisationframework-and-tools/)

- 83 Interviews 34 and 37, 50, Workshop 3
- 84 Interviews 20, 21, 22, 35, 10, 12, 64, Workshop 1
- 85 Interview 63
- 86 Interviews 12, 20, 18, 21, 23
- 87 Interview 14
- 88 Interviews 24-28, 64
- 89 Interviews 18, 30, 64
- 90 Interview 22
- 91 Interviews 9, 29, 31, 32. For example the Charter for Change country-level group in DRC has gone through a process of clearly differentiating and articulating value add of different actors in its strategic plan (<u>https://charter4change.files.wordpress.com/2021/03/strategic-communication-plan-for-the-c4c-drc-2021-2023.pdf</u>)
- 92 Workshop 2
- 93 Interview 32
- 94 Workshop 2 and 3
- 95 Interview 7
- 96 Interview 32
- 97 Interviews 5, 12, 24-28
- 98 Interviews 7, 20
- 99 Interview 34
- 100 Interviews 26, 38, 44, 45, 47, 50; Featherstone and Mowjee, Desk review on enhancing the potential of pooled funds for localisation, 2020.
- 101 See NSIA Annual Report 2019 (<u>https://media.ifrc.org/ifrc/wp-content/uploads/2020/08/20200826_</u> NSIA_AnnualReport2019.pdf)
- 102 Interview 47