

HPG Working Paper

Funding to local humanitarian actors

South Sudan case study

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Acronyms

BRACE	Building Resilience through Asset Creation and Enhancement
BRIDGE	Building Responsibility for Delivery of Government Services Program
CAP	Consolidated Appeal Process
CHS	Core Humanitarian Standards
CPA	Comprehensive Peace Agreement
DEPP	Disaster Emergency Preparedness Programme
DFID	Department for International Development
ECHO	European Civil Protection and Humanitarian Aid Operations
EU	European Union
FPA	Framework Partnership Agreement
FTS	Financial Tracking Service
HARISS	South Sudan Humanitarian Programme
HCT	Humanitarian Country Team
HPF	Health Pooled Fund
HPG	Humanitarian Policy Group
HRP	Humanitarian Response Plan
ICWG	Inter-Cluster Working Group
IRISS	Improving Resilience in South Sudan
INGO	International non-governmental organisation
IOM	International Organization for Migration
IPC	Integrated Food Security Phase Classification
KII	Key informant interview
MoU	Memorandum of Understanding
NEAR	Network for Empowered Aid Response
NNGO	National non-governmental organisation

OCAT	Operational Capacity Assessment Tool
ODA	Official Development Assistance
ODI	Overseas Development Institute
OFDA	Office of U.S. Foreign Disaster Assistance
OLS	Operation Lifeline Sudan
PCA	Programme Cooperation Agreement
RRF	Rapid Response Fund
SAG	Strategic Advisory Group
SCCF	Small Charities Challenge Fund
SSFA	Small Scale Funding Agreement
SSHF	South Sudan Humanitarian Fund
TDP	Talent Development Project
UN	United Nations
USAID	United States Agency for International Development
WASH	Water, sanitation and hygiene
WFP	World Food Programme

Executive summary

In May 2016, 18 donor countries and 16 aid organisations (including United Nations (UN) agencies, international non-governmental organisations (INGOs) and the Red Cross Movement) signed a ‘Grand Bargain’ outlining 51 mutual commitments across ten thematic workstreams.

Workstream two – more commonly known as ‘localisation’ – commits donors and aid organisations to provide 25% of global humanitarian funding to local and national responders by 2020, along with more unrestricted money and increased multi-year funding.

The objective of this research is to provide in-depth data (quantitative and qualitative) on the barriers to increasing the level of direct funding to national NGOs (NNGOs) in South Sudan. The research provides an understanding of the amount of funding that goes to local actors, directly and indirectly, through INGOs, UN agencies and donors. The research also strengthened the capacity of researchers from South Sudan, with Aid Works working closely with two South Sudanese researchers to plan, collect and analyse the data.

The key research areas analysed were: direct funding to local actors; partnership quality; capacity strengthening; funding quality; and the potential for future change. Evidence on overhead coverage and good practices was also captured by the case study. The research highlights recommendations that should be considered immediately or in the medium term to increase funding to NNGOs. The research does not cover human resource levels in depth.

Direct and indirect funding

The amount of humanitarian funding provided to local and national responders in South Sudan in 2017 was far short of the Grand Bargain’s 25% target, with the vast majority – around 90% – of humanitarian funding being directed to and used by INGOs and UN agencies. The study estimated 4.3% of funding goes directly to local/national responders (mainly government – only 0.3% to NNGOs) and 5.9% indirectly, totalling an equivalent of 10.2% of funds captured in the Financial Tracking Service (FTS). Funding is increasing to NNGOs via intermediaries;

mainly INGOs, UN agencies, or the South Sudan Humanitarian Fund (SSHF). The number of NNGOs being funded is dramatically increasing, but the total amount is not increasing at the same rate. Every international agency interviewed is trying to increase funding to NNGOs, but this is not coordinated, monitored or planned (with little evidence of explicit transition planning to NNGOs). By having an individual agency approach, there is a risk of overburdening the successful NNGOs and missing potentially capable NNGOs that are less well known. There is a lack of opportunities for NNGOs to lead implementation themselves (without an intermediary), or to lead a consortium – no consortium is led by an NNGO in South Sudan. However, INGOs and UN agencies do have South Sudanese senior leadership.

The UN and INGOs are relied upon by donors to provide funding to the NNGOs, meaning that they, as intermediaries, both manage the administration burden and carry the risk. This is partly due to donors’ capacity constraints and limitations in their own country capacity to monitor or manage more partners. Therefore, it is unlikely that NNGOs will gain more direct funding from major donors, and will continue to receive income via intermediaries. Individual amounts of funding to NNGOs are likely to remain small if intermediaries continue with the current level of caution.

Partnership quality

NNGOs are members of coordination and oversight mechanisms. Where there are longer-term partnerships in place between an NNGO and INGO or UN agency, the NNGO is involved in project budgeting but the decision on the overall funding amount often lies with the intermediary. Some agencies are looking at NNGOs as a useful resource to be utilised as partners, while others view them as gap fillers (suppliers) when international agencies cannot deliver or feel that NNGOs are better suited to delivering development projects. Many interviewees recognise that if NNGOs are supported, they will do a better job and have fewer issues with compliance/implementation. However, support takes time and effort and many initiatives are in progress. To improve perceptions, NNGOs also need more visibility within the system and, as for any small actor, this is not easy for a small team.

Capacity strengthening

There is an enormous amount of training available for NNGOs via UN agencies, INGOs, clusters and other organisations. Given the relative youth of South Sudanese NGOs, this is welcome, but there is a need for the right kind of capacity building (and not just training). Investment in capacity building is driven by individual intermediaries, partnerships between an international agency and NNGO, or the NGO Forum. There is overlap and not a huge amount of coordination: for example, the same NNGO may receive financial management training from several international partners. Successful schemes blend training and mentoring, focusing on the NNGO's field staff. However, NNGOs will never be able to compete with salary levels in INGOs and the UN, and therefore cannot attract and retain highly qualified staff.

Funding quality

Policies on overheads vary and lack standardisation. While many UN agencies and INGOs provide a combination of unrestricted overhead funding and/or indirect funding, NNGO running costs are not fully covered due to the high operational costs in South Sudan and a lack of will on the behalf of funders to cover all administrative costs associated with running an organisation. There is no clear message coming from donors that would help advocate for improved coverage of NNGO real costs.

Potential for change

All donors and intermediaries are risk averse and do not want funds to be used inappropriately. The caution of intermediaries has a major effect on the amount of funding NNGOs receive, but while fraud and corruption are important issues to tackle, they

are not only issues for NNGOs and affect the whole sector. Transparency is needed by all actors. On the one hand, NNGOs must ensure they have systems in place that meet the requirements of the international community but they cannot be expected to have these in place without support. On the other hand, donor systems can be difficult and non-standardised, with reporting systems different for each donor, and ways must be found to decrease the NNGOs' administrative burden.

Recommendations

Immediate

- Regularly monitor how much funding goes to NNGOs.
- Establish better communication with donors.
- Utilise the results from the NGO Forum's Operational Capacity Assessment Tool (OCAT).
- Standardise intermediary policies on overheads.
- Continue to invest in building skills and knowledge.
- Continue to provide technical training.
- Grow evidence to show NNGO effectiveness.
- Improve NNGO sectoral leadership.

Medium-term

- More direction from donors
- Change the risk appetite when dealing with NNGOs.
- Do not wait for the development phase to provide specific NNGO funding.
- Adjust donor compliance requirements or provide more support.
- Develop a better NNGO mapping.
- Create a strategic approach to how NNGOs are funded.
- Change the approach to capacity building.
- Share NGO performance information.
- Be transparent about remuneration.

1 Background

1.1 The study

In May 2016, 18 donor countries and 16 aid organisations (including UN agencies, INGOs and the Red Cross Movement) signed a ‘Grand Bargain’ outlining 51 mutual commitments across ten thematic workstreams:

1. Greater transparency.
2. More support and funding for local and national responders.
3. Increased use and coordination of cash-based assistance.
4. Reduced duplication and management costs.
5. Improved joint and impartial needs assessments.
6. Include the people receiving aid in making the decisions that affect their lives (the participation revolution).
7. Increased collaborative multi-year planning and funding.
8. Reduced earmarking of donor contributions.
9. Harmonised and simplified reporting requirements.
10. Enhanced engagement between humanitarian and development actors (ODI, 2018).

Workstream two – more commonly known as ‘localisation’¹ – commits donors and aid organisations to provide 25% of global humanitarian funding to local and national responders by 2020, along with more un-earmarked money and increased multi-year funding. Such changes aim to ensure greater predictability and continuity in humanitarian response.²

In 2017, workstream two discussions highlighted a number of important areas that were not addressed in the original commitments, such as the downward transfer of risk towards local and national actors and support costs, and inclusion of and engagement with local organisations across the Grand Bargain. Several signatories noted that discussions on localising responses have taken place largely without the direct engagement of local actors themselves (ODI, 2018).

NEAR (Network for Empowered Aid Response) has commissioned the Humanitarian Policy Group (HPG) at the Overseas Development Institute (ODI) to conduct this research, which focuses on understanding the barriers preventing organisations and donors from partnering with local and national responders. ODI is coordinating two case studies, in South Sudan and Somalia, with Aid Works leading the South Sudan case study. NEAR is a global network of local and national NGOs that was launched in May 2016 at the World Humanitarian Summit. The network’s ambition is to reshape the top-down humanitarian and development system into one that is locally driven and owned, and based on equitable, dignified and accountable partnerships.

Only small amounts of humanitarian assistance resources are allocated to local actors and a detailed understanding of their constraints and challenges is lacking. Globally, in 2017, 2.9% of total humanitarian funding assistance was directly provided to local and national responders – a small increase from the previous year (2%) (Development Initiatives, 2018). This is likely to be an underestimate, due to the lack of reliable country-level funding-flow data. This case study is the first attempt to capture this data from South Sudan and is the first time that NNGOs in South Sudan have been engaged on Grand Bargain commitments regarding localisation.

1.2 South Sudan

During 2011–13, South Sudan had a short period of relative peace after its independence from Sudan. Donors started to plan for longer-term, more development-orientated funding, aligned with the government’s South Sudan Development Plan 2011–13. In December 2013, widespread violence erupted across the country, starting a new phase of humanitarian response. Since then, violence has displaced around 1.74 million people, with 2.47 million more fleeing to neighbouring countries (OCHA, 2018).

The economic situation deteriorated and in 2016 hyperinflation led to a dramatic increase in the price of household goods and food, especially fuel and cereals. Localised famine was declared in two counties; high levels of food insecurity continue across the

1 www.agendaforhumanity.org/initiatives/3861

2 *Ibid.*

Map 1: South Sudan



country. The formerly peaceful Eastern, Central and Western Equatoria states, once considered the ‘bread basket’ of South Sudan, experienced severe conflict. This contributed to an overall 40% decline in food production in February–April 2017 compared with the same quarter in 2016 (ICG, 2017). By January 2018, 5.3 million people (48% of the population) were estimated to be facing acute food insecurity,³ according to the Integrated Food Security Phase Classification (IPC).^{4 5}

People in South Sudan have been more susceptible to disease outbreaks since 2013, with the most recent cholera outbreak starting in June 2016 and running until the end of 2017. The outbreak led to 20,438 cases of cholera across 27 counties, causing 436 deaths (Ministry of Health, South Sudan, 2018) and was South Sudan’s longest-running cholera outbreak since achieving independence in 2011.

The humanitarian response to the multiple crises has been led by UN agencies, INGOs and an increasing number of NNGOs, coordinated through the humanitarian cluster system. In 2018 priority target sectors are: food security and livelihoods (target of 5.2 million people); water, sanitation and hygiene (WASH) (3.3 million people); protection (3.7 million); and health (2.1 million) (OCHA, 2017).⁶ There are also more medium-term resilience projects such as Building Resilience through Asset Creation and Enhancement (BRACE),⁷ Improving Resilience in South Sudan (IRISS),⁸ and the South Sudan Humanitarian Programme (HARISS).⁹

1.3 Objectives of the research

The objective of the research is to provide in-depth data (quantitative and qualitative) on the barriers to

3 IPC Phase 3 (crisis) and IPC Phase 4 (emergency).

4 See www.ipcinfo.org/ipc-country-analysis/details-map/en/c/1110688/

5 IPC is hosted within the National Bureau of Statistics and the chair of the technical working group is in the Ministry of Agriculture, Forestry, Cooperatives and Rural Development. The national technical working group is composed of 15 members from government ministries, UN agencies and NGOs; see: www.ipcinfo.org/

6 Other cluster targets for 2018: camp coordination and camp management (0.8 million); education (0.6 million); emergency shelter and non-food items (1.1 million); and nutrition (1.1 million) (OCHA, 2017).

7 See www.reach-initiative.org/baseline-report-for-the-impact-evaluation-of-dfids-brace-programme-south-sudan

8 See www.braced.org/about/about-the-projects/project/?id=4dfc5e51-173e-4fe6-a97a-7edc5bb515d1

9 See <https://devtracker.dfid.gov.uk/projects/GB-1-204019>

Table 1: Research areas and sub-criteria

Research area	Sub-criteria
Direct funding	• Qualitative data made available
	• Availability
	• Risks
	• Opportunities
	• Future improvements
Partnership quality	• Types and models of partnership
	• Policies
	• Experience
	• Monitoring, evaluation and learning
	• Future improvements
Transaction costs	• Fund flow/transaction chain
	• Values of and challenges with the transaction chain
	• Future improvements
Overheads	• Approach to overheads
	• Barriers and challenges
	• Future improvements
Capacity strengthening	• Current approaches or related approaches
	• Priorities and needs
	• Future improvements
Potential changes	• Planned or likely to happen (short and medium term)
	• Most significant barriers
	• Most significant opportunities
Funding quality	• Covering real costs
	• Level of flexibility

increasing the level of resources going directly to local actors.¹⁰ The research provides an understanding of the amount of funding that goes to local actors, directly and indirectly, through INGOs, UN agencies and donors. The research also strengthened the capacity of researchers from South Sudan, with Aid Works working closely with two South Sudanese researchers to plan, collect and analyse the data.

The key research areas analysed were:

- Direct funding to local actors.
- Partnership quality with local actors, across different levels (e.g. capital office and field offices).
- Transaction costs associated with funding local actors.

- Overhead coverage of local actors.
- Approaches to and investment in strengthening capacity of local actors to manage funds.
- Plans, opportunities and risks for shifting funding to local actors (potential for change).
- Quality of funding provided to local actors.

1.4 Approach and methodology

Primary data collection consisted of key informant interviews (KIIs), a group consultation with NNGOs and financial data collection from NNGOs and intermediary fund recipients (UN agencies and INGOs) that agreed to share their data.

KIIs consisted of one-to-one, semi-structured discussions between the researchers and interviewees, lasting around 30–60 minutes. The interviews covered a mixture of

¹⁰ Local actors could be local NGOs, local researchers, host government. This does not include local chapters of INGOs.

Table 2: Summary of data collection methods and tools

Activity	Completed	Data collection tools
Key informant interviews	• 15 NNGOs	Semi-structured interview guidelines
	• 5 INGOs	
	• 3 donors	
	• 3 UN agencies	
	• 2 fund managers	
	• 4 other stakeholders	
NNGO Consultative Meeting	13 NNGOs	Session plans
Intermediary quantitative data	8 intermediaries	Excel template
NNGO quantitative data	11 NNGOs (2016); 9 NNGOs (2017)	Excel template

donors, intermediary fund recipients, NNGOs and other key stakeholders. The researchers held a consultative meeting with the NNGOs during a visit to Juba. The meeting was hosted by the NGO Forum, which invited NNGOs that had previously received humanitarian financing. The event was a participatory discussion covering core parts of the research, testing hypotheses and introducing the financial data collection tool.

For the financial data collection, ODI created a simple Excel template that the informants populated (see Annex 1 for a description of the data collection methodology). The data was used to triangulate the qualitative data the researchers collected during the KIIs and the NNGO consultative meeting.

1.5 Limitations and mitigating factors

The research was primarily qualitative in nature. Limitations of the research included:

- Time to conduct the data collection in South Sudan was limited, which meant not all stakeholder meetings could take place.

- The study did not focus on South Sudanese staffing levels across NNGOs and intermediaries.
- The ongoing humanitarian situation in South Sudan limited the availability of potential participants in the research, particularly with regards to providing quantitative data. This was, to an extent, expected, hence the research design shifted towards collecting qualitative data.
- There was no validation meeting held with the wider stakeholders. During the NNGO consultation meeting, key hypotheses and findings were tested to gain feedback from the NNGOs. Aid Works is planning to hold a dissemination presentation in Juba at a later date; the international researcher will document feedback as an addendum to the case study.
- There has been much debate at the global level on reaching agreement on definitions of local and national actors, and the definition of local and national actors for South Sudan is not explicit (ODI, 2018). This case study focused on NNGOs that were registered with the NGO Forum.
- The complex environment and context of South Sudan was also outside the scope of the research.

2 Findings

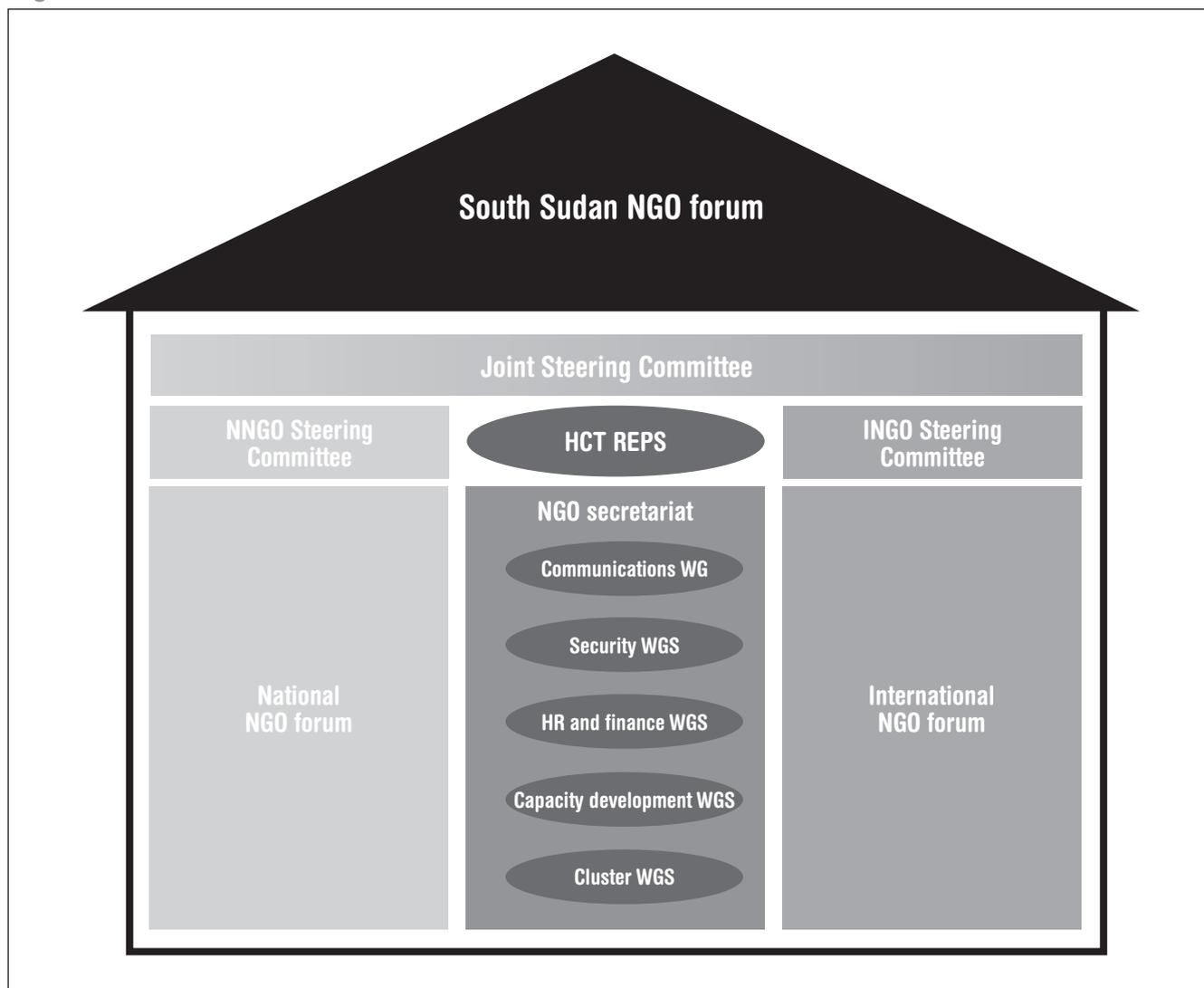
2.1 Funding

2.1.1 History

South Sudan has a complex history as an international aid recipient. During Operation Lifeline Sudan (OLS) there were effectively no southern Sudanese NGOs. The international aid response was very much an internationally funded, coordinated and executed operation, with southern Sudanese playing roles as agency staff, military liaisons for aid coordination and protection, and community volunteers. There were also extensive networks of church-led supporting

services. Following the signing of the Comprehensive Peace Agreement (CPA) in 2005, a number of southern Sudanese NGOs began to form and, with the support of the US government in particular, began to develop their structures and capabilities. The Office of U.S. Foreign Disaster Assistance (OFDA) notably encouraged a number of their key INGO partners, including Norwegian People's Aid and Save the Children, to partner with and provide practical support to hand-picked southern Sudanese NGOs. These NGOs were provided with physical office space, satellite communications, vehicles, mentoring and capacity-strengthening support, often in extremely

Figure 1: South Sudan NGO Forum structure



remote locations. The number of INGOs operating in southern Sudan also increased significantly during the CPA implementation period and in the two years following the creation of an independent state of South Sudan in 2011.

Since 2006, NNGOs and INGOs have been served by the South Sudan NGO Forum, a voluntary, independent networking body. The Forum comprises two main constituencies (NNGOs and INGOs) served by a joint Steering Committee of INGO and NNGO members coordinated by the NGO Secretariat (see Figure 1).

Membership of the NGO Forum increased from approximately 65 registered INGOs in 2007, to 136 international members and 92 national members by 2013 (Helton and Morgan, 2013) and there are currently 205 national and 115 INGO members. The Forum provides a platform through which national and international NGOs, the Government of South Sudan, UN, donors, and other external stakeholders can exchange information, share expertise and establish guidelines for a more networked, efficient and effective use of aid resources in South Sudan. The Secretariat primarily focuses on information sharing, networking and capacity enhancement, representation and communication around safety and wellbeing.

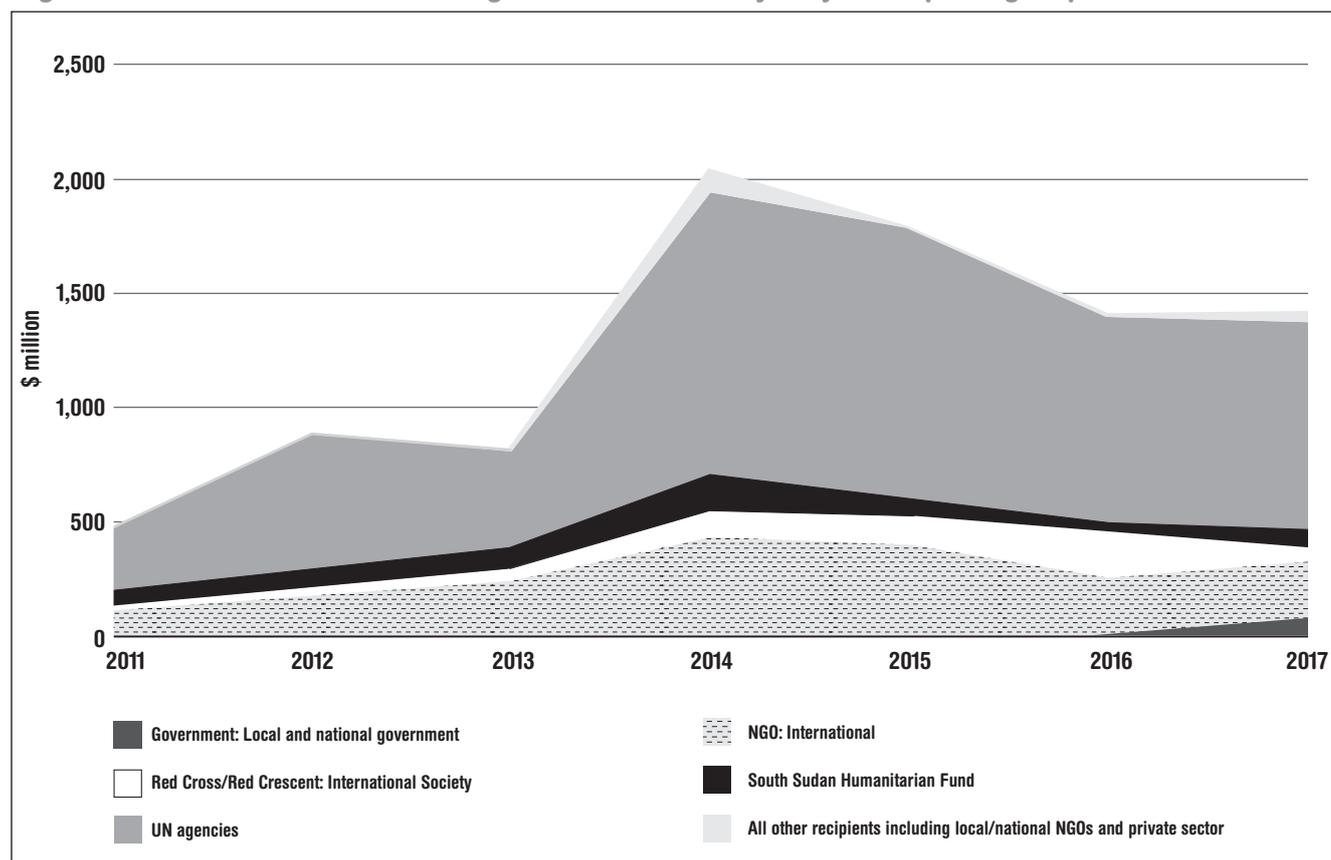
Aid spending to South Sudan was not tracked separately from aid to the rest of Sudan prior to secession and the creation of the independent state of South Sudan in 2011. Since then, South Sudan has become a recipient of Official Development Assistance (ODA) in its own right. Figure 2 illustrates the changing nature of humanitarian funding since independence.

Between 2011 and 2013, funding started to focus on development or transition from relief to development, relating to peacebuilding, governance and community activities.¹¹ Following a series of major governance and economic crises, the outbreak of civil war in 2013 led to yet more change, with ODA funding moving away from state institutions, and back towards supporting the humanitarian response to the rapidly escalating humanitarian crisis.¹² This crisis devastated the fragile and hard-won gains in food security, service provision and infrastructure achieved since the CPA was signed.

11 Kills NNGO, other stakeholders.

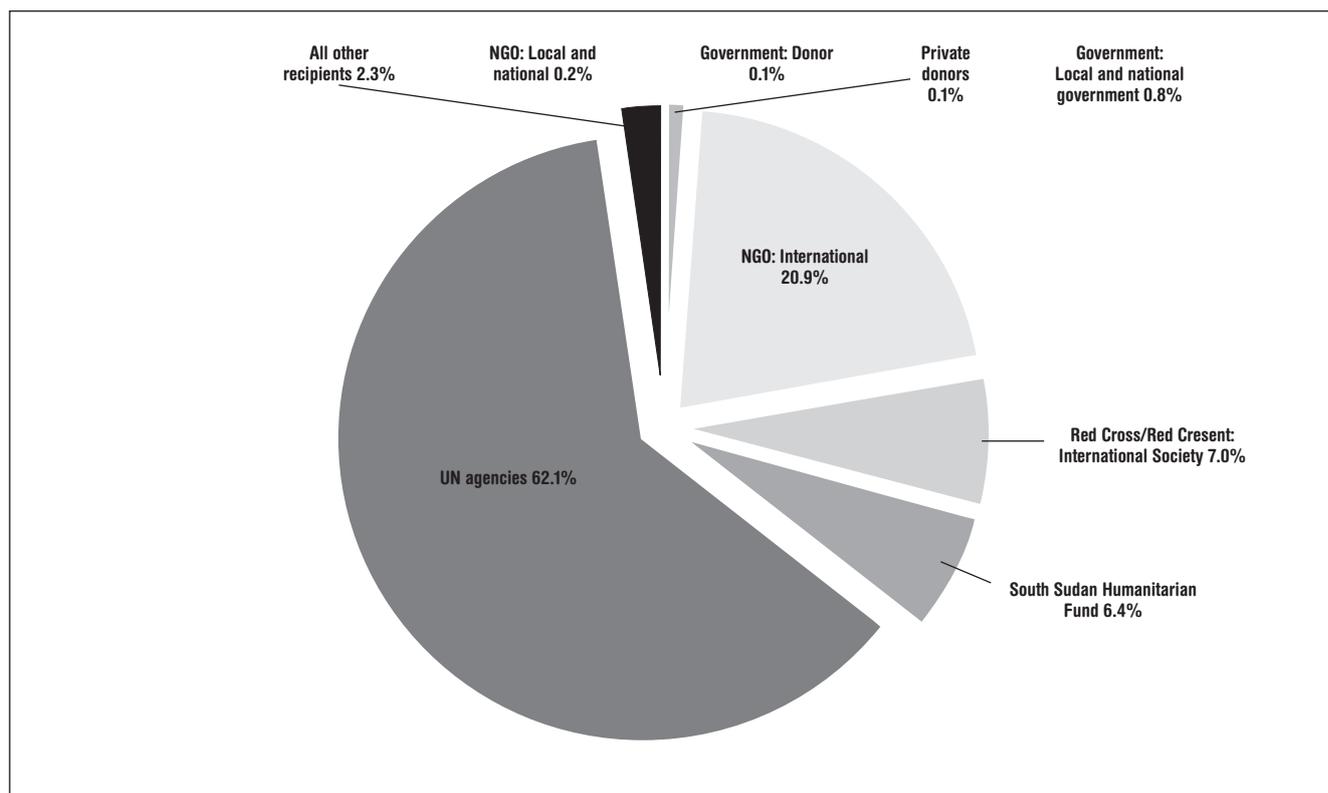
12 Notably, the Government of South Sudan suspended oil production in 2012 after failing to reach an agreement on revenue sharing with the Government of Sudan, cutting off their primary source of revenue and leading to a period of fiscal austerity (Biong, 2013).

Figure 2: Humanitarian aid funding to South Sudan by major recipient group 2011–2017



Source: UN OCHA Financial Tracking Service

Figure 3: Humanitarian funding to first-level funding recipients 2013–2017



Source: UN OCHA Financial Tracking Service

The UN has remained the leading recipient of humanitarian funding in South Sudan throughout the post-2011 period, receiving 62.1% of total humanitarian aid in the five-year period between 2013 and 2017 (see Figure 3). The UN World Food Programme (WFP) has been the leading recipient of funding by a significant margin, receiving an average of 43% of the total funding to the crisis since 2013.¹³ Despite the extremely high-risk operating environment, with aid workers frequently subject to violent attack, NNGOs have continued to increase in number. Very few are in receipt of direct funding, however, and between 2013 and 2017 local and national NGOs received just 0.2% of the total international humanitarian aid as reported to the FTS. Although 92% of INGO staff are South Sudanese according to the NGO Forum.

2.1.2 Availability of funding

According to the data collected for this study, in 2017, NNGOs received \$3.6m in direct funding from donors (0.3% of total funds captured within the FTS), a further \$50.8m through UN agencies within the data set, and \$14.2 million through the SSHF (see Figure 4). The combined total of direct and indirect funding (\$68.9 million) represents around 4.9% of the total funds given to the crisis in 2017. The government also received \$58.3 million in direct funding from

donors in 2017 and \$7.4 million via UN agencies, which together represents the equivalent of 4.6% of total funds to the crisis captured within the FTS.¹⁴ The study estimated 4.3% of funding goes directly to local/national responders (mainly government – only 0.3% to NNGOs) and 5.9% indirectly, totalling an equivalent of 10.2% of funds captured in the Financial Tracking Service (FTS).

The majority of funding to NNGOs is given via intermediary UN and INGO recipients (and channelled via the SSHF) (see Figure 5 for details of income reported by NNGOs). One reason for this is that donors want to reduce transaction costs and do not have the capacity in-country to manage a large number of contracts.¹⁵ Donors are looking for ways to increase direct funding to NNGOs; however, this has not been very successful to date. At present, the UK Department for International Development (DFID) provides funding to NNGOs through the SSHF, UN agencies and different consortia in which there is an INGO lead contractor (BRACE, IRISS and HARISS).¹⁶ The United States Agency for International

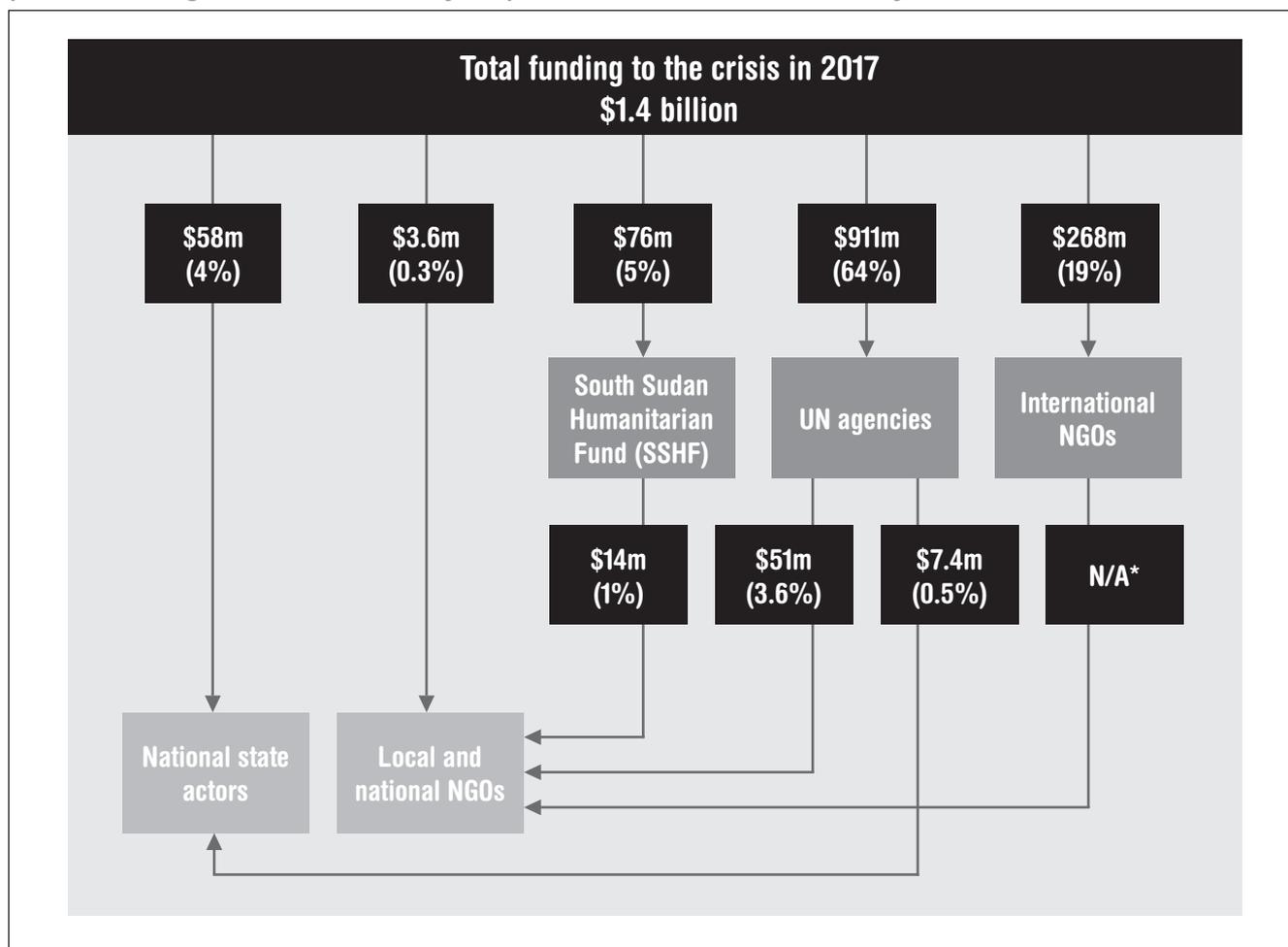
14 Note this under-represents the full amount as it is based on NEAR's partial data set.

15 KII donors.

16 KII donors.

13 FTS.

Figure 4: Direct funding to local and national state and non-state actors in 2017 and funds passed through one intermediary, captured within the NEAR study set

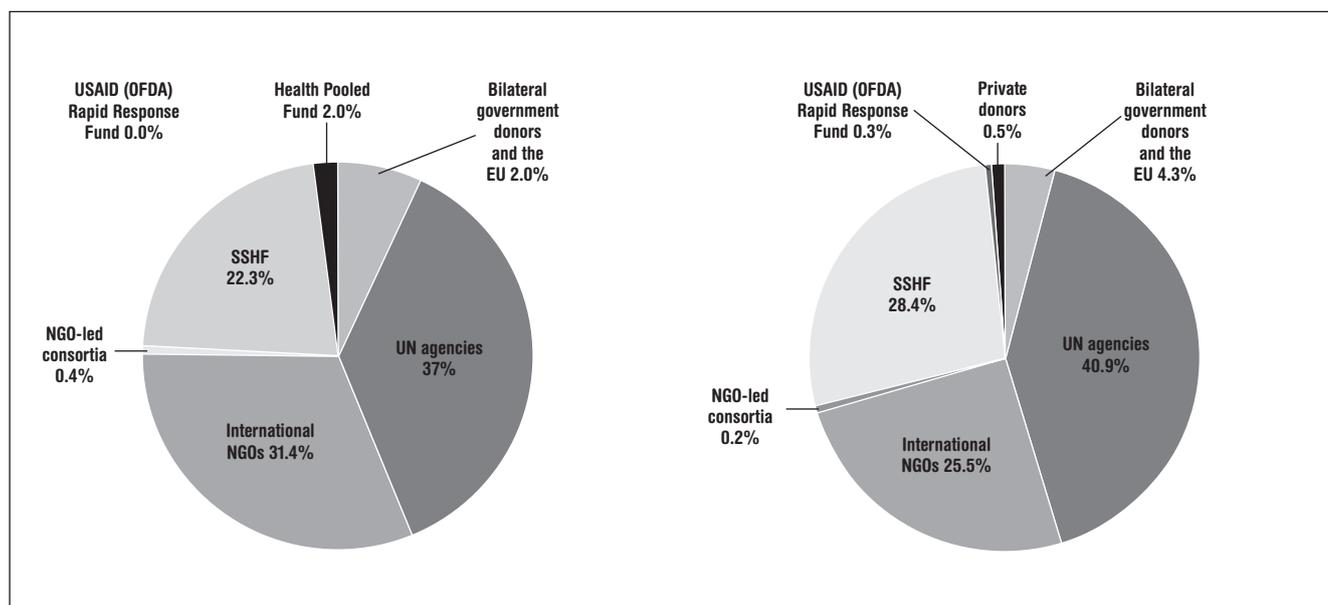


Note: Percentages based on total funding reported to the crisis in the OCHA FTS (\$1.4 billion).

* The number of INGO respondents to the NEAR data collection exercise was too low to provide representative values for volumes of funds passed on to partners and therefore has been omitted.

Source: OCHA FTS and NEAR data set

Figure 5: Income reported by South Sudanese NNGOs in 2016 and 2017



Source: Aid Works data collection

Box 1: The South Sudan Rapid Response Fund

RRF, managed by IOM and funded by USAID, is seen by many interviewees as one of the most simple and responsive mechanisms for any NGO (international or national) and its aim is to support them to respond to natural and man-made disasters. NGOs must have the capacity to swiftly implement specific emergency interventions that respond to the immediate needs of affected populations. The disadvantage of the RRF is that the duration of its funding is very short; it prioritises activities that do not last for more than three months, but will also consider longer implementation periods should there be a clear need (International Organization for Migration South Sudan, 2017). The RRF has also increased the number of NNGOs funded over time, with the vast majority of funding going to NNGOs in this current grant cycle (2018). Interestingly, the NNGO data set showed that their RRF income was relatively small compared to the overall income received.

Development (USAID) provides funding to NNGOs through the International Organization for Migration (IOM)-managed Rapid Response Fund (RRF), UN agencies and INGO sub-contracts (e.g. IMA World Health, Concern Worldwide). The European Civil Protection and Humanitarian Aid Operations (ECHO) provides no direct funding to NNGOs and its South Sudan office does not track if funding is provided to NNGOs through its recipients.¹⁷

Interviews and the NNGO data set corroborated the main sources of funding as:

- UN agencies: approximately 45% of WFP's recipients are NNGOs.¹⁸ UNICEF provides funds to NNGOs via both Programme Cooperation Agreements (PCAs) and Small Scale Funding Agreements (SSFAs). The amount of funds passed on to NNGOs varies; one UN agency passed approximately 9% of their disbursed funds to NNGOs, while another provided over 50%. The NNGO data set showed that 37% of their income came from UN agencies in 2016, and 41% in 2017.¹⁹

17 KIIs donors.

18 This percentage is based on the number of partners, not financial amounts. WFP has partnered with: 34 NNGOs and 43 INGOs (2017), 33 NNGOs and 40 INGOs (2018) (WFP, 2018).

19 Aid Works quantitative data collection in South Sudan.

- INGOs provide funding as sub-grants from donor funding, as part of I/NNGO consortia, or by using their unrestricted funding.²⁰ The NNGO data set showed that 31.4% (2016) and 25.5% (2017) of their income came from INGOs.
- The SSHF has increased the amount of funding to NNGOs and the number of NNGOs funded.²¹ The NNGO data set showed that 22.3% (2016) and 28.4% (2017) of their income came from the SSHF.

During 2016–17, South Sudan became the second most dangerous humanitarian crisis for aid workers (Humanitarian Outcomes, 2017). This has reduced humanitarian access (ACAPS, 2017), with UN agencies and INGOs not travelling to or working in a lot more of the country than in previous years.²² Consequently, NNGOs are receiving increased amounts of funding via intermediaries as they are able to work in hard-to-reach communities.²³ The added complication of localised famine in 2017 increased funding in specific areas and for specific NNGOs.²⁴ The views of the interviewees are confirmed by the data set, which showed all NNGOs reporting 2016 and 2017 data increasing their funding by substantial amounts (see Figure 6). While NNGOs predominantly rely on intermediaries for funding,²⁵ some intermediary funding schemes (including SSHF, RRF and UN agencies) are discouraging INGOs to sub-contract to NNGOs, and instead are advising NNGOs to approach the schemes directly. This trend is evident in Figure 7 and we can expect it to continue, meaning that NNGOs have greater access to funding in 2018.²⁶

2.1.3 Decision-making roles

NNGOs are represented in the Humanitarian Country Team (HCT), where they have a voice in guiding the Inter-Cluster Working Group (ICWG).²⁷ However, the priorities of INGOs and NNGOs at these meetings often differ.²⁸ NNGOs interviewed did not feel as though this representation was enough to help

20 KIIs INGOs.

21 KII UN agency and data available.

22 KIIs UN agencies, donors.

23 KIIs UN agencies, INGOs.

24 KIIs NNGO, INGO.

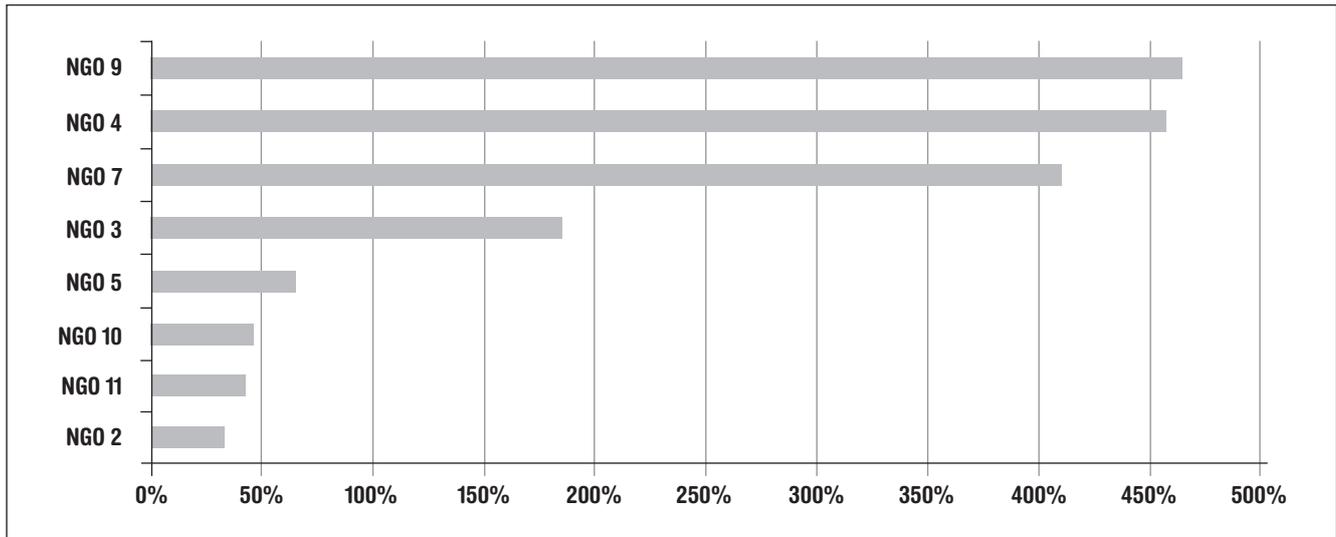
25 NNGO Consultative Meeting, KIIs NNGOs.

26 KIIs UN agencies.

27 KIIs donors, other stakeholders.

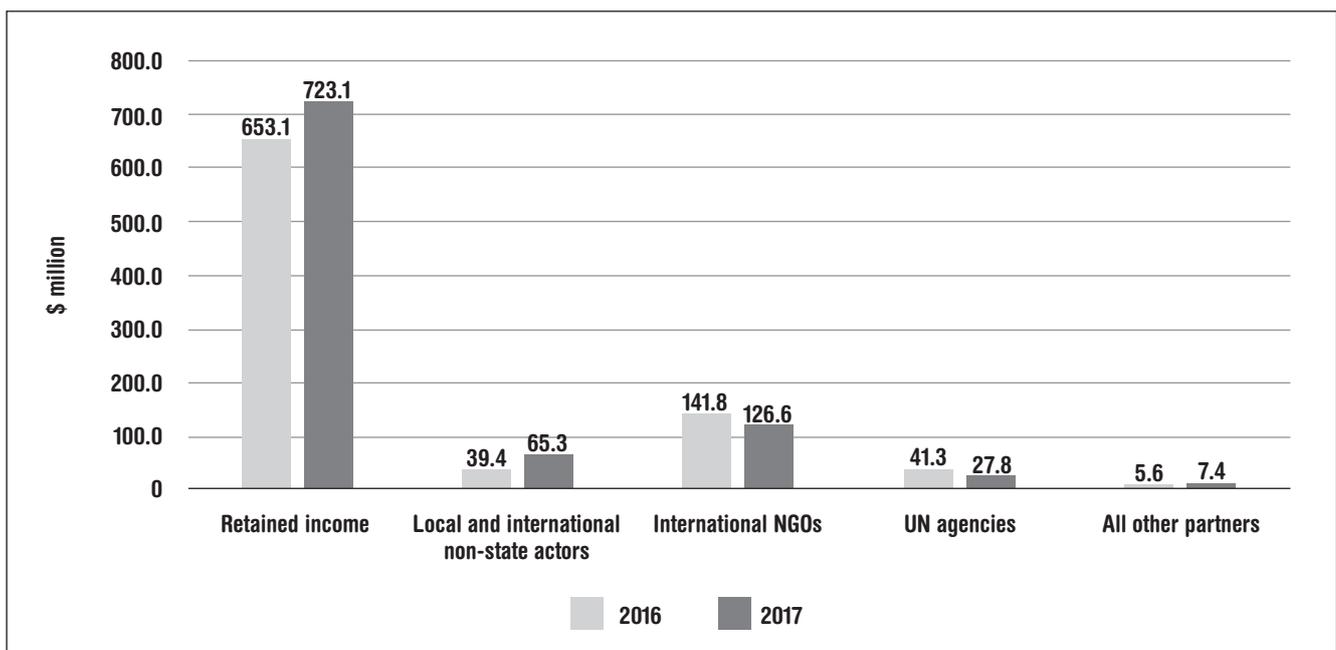
28 KIIs donors, other stakeholders.

Figure 6: Percentage change in income between 2016 and 2017 for NNGOs reporting data



Source: Aid Works data collection

Figure 7: Growth in funding to local and national NGOs via international intermediaries at the expense of international partners in 2017



prioritise funding or advocate for change. However, the NGO Forum has started initiatives to engage NNGOs and donors. NNGOs are co-leads at the state level for specific clusters; here the NNGO has a coordination role for the state, sharing responsibilities with the INGO and UN agency co-leads.^{29 30} However,

this role does not have influence over the prioritisation or management of funds.³¹ For many years,³² NNGOs have been represented in each cluster’s Strategic Advisory Group (SAG), where they assess SSHF proposals alongside INGO and UN members.³³ Many clusters have been very active in involving and engaging new NNGOs in the Consolidated Appeal Process (CAP), Humanitarian

29 Clusters where implemented: Camp Coordination and Camp Management (CCCM), Emergency Shelter and Non-Food Items (NFI) and water, sanitation and hygiene (WASH) clusters.

30 KIIs UN agencies, NNGOs, NNGO Consultative Meeting.

31 KII NNGO.

32 KII UN agency.

33 KIIs UN agency, donors.

Response Plan (HRP) and SHHF processes,³⁴ with the Nutrition Cluster often cited as doing this well. NNGOs have to commit a lot of time to engage in the HCT, HRP and SAG, which is challenging when their senior managers in Juba are stretched (for example engaging in several clusters concurrently).³⁵ The NGO Forum also has several Steering Committees (NNGO Steering Committee, INGO Steering Committee and Joint INGO-NNGO Steering Committee).

NNGOs face major barriers in getting across their needs to, and influencing priorities of, donors outside of the clusters. NNGOs are not involved or engaging in any other prioritisation/management of funds outside of the cluster system.³⁶ The majority of NNGOs stated that funding decisions are largely dictated to them by INGOs or UN, with some examples of INGOs and UN agencies working in partnership to decide needs. The latter happens when a longer-term relationship exists and organisations are willing to spend time communicating with the NNGO.³⁷ There is a sense from NNGOs that they are used for ‘gap filling’,³⁸ when INGOs have been evacuated,³⁹ or when the risk of insecurity is too high for INGOs/UN agencies.⁴⁰ As well as feeling unable to influence what funding they receive from UN agencies, NNGOs feel pressured to reduce costs;⁴¹ areas such as training and security management are often neglected.⁴²

2.1.4 Obstacles to scaling up direct funding

‘The system is designed to not allow the NNGO to get funding without permission of an INGO, UN or fund manager’ (NNGO)

The research team has documented the key themes from interviews and the NNGO consultative meeting. Administrative obstacles include compliance/due diligence, donor policies and a lack of transition planning. Funding is predominantly short-term and inconsistent, creating uncertainty and leaving some

NNGOs unable to build internal systems or cover all overheads. There are also contextual challenges surrounding perceptions of NNGOs, communication and human resources.

Compliance, due diligence and application processes UN intermediaries acknowledged that compliance and due diligence expectations are high,⁴³ with INGOs and UN intermediaries consistently stating that NNGOs need to demonstrate strong management systems (for example financial systems, human resource processes, organisational policies and organisational structures). NNGOs consistently stated the difficulties of completing the application processes for funding⁴⁴ and were able to cite many occasions when the due diligence process inhibited them from receiving funding.⁴⁵ Examples of requirements they could not fulfil included providing three/five years of audited accounts and having the equivalent number of years’ experience.^{46 47} NNGOs and INGOs are held to the same standard in theory, but expected standards are very different in relation to security risks, with NNGOs expected to accept a far higher level of risk.⁴⁸ INGOs also have the advantage of already having regular audits, internal control procedures and a history of performance to show in South Sudan.⁴⁹

Box 2: Good practice example

An INGO conducts a due diligence process; however, even if the NNGO has weak control systems, the INGO may decide to fund them and support them to build the systems. The NNGO’s values and approach are more of a priority than their systems.⁵⁰

Donor policies

Policies across all major donors inhibit NNGOs receiving direct funding with NNGOs citing that donor policies favour international agencies receiving direct

34 KIIs donor, NNGO.

35 KIIs other stakeholders, NNGO Consultative Meeting.

36 NNGO Consultative Meeting.

37 NNGO Consultative Meeting, KII INGO.

38 KII NNGO.

39 KII NNGO.

40 KIIs NNGOs, INGOs.

41 NNGO Consultative Meeting.

42 KII other stakeholder.

43 KIIs INGO, UN agency.

44 NNGO Consultative Meeting, KII NNGO.

45 KII UN agency.

46 NNGO Consultative Meeting, KIIs NNGOs.

47 Many of the NNGOs were created post-2013 in response to the conflict.

48 KII UN agency.

49 KII UN agency.

50 KII INGO and corroborated by KII NNGO.

funding.⁵¹ Financial regulations state that ECHO can fund agencies only if they have offices in an European Union (EU) Member State, and have signed a Framework Partnership Agreement (FPA). No South Sudanese NGOs have an FPA.⁵² USAID/OFDA regulations are well known for their complexity, with even basic requirements such as obtaining a DUNS number being challenging for NNGOs.⁵³ USAID is investigating whether it can provide funding directly to NNGOs in South Sudan, and has audited two NNGOs. The internal auditor passed the NNGOs to receive just \$50,000 direct funding, despite them having multi-million dollar turnovers, and existing contracts greater than \$50,000 (including one of the NNGOs receiving more than \$50,000 of OFDA funding through an intermediary).⁵⁴

'It's not going to be easy to do any direct funding via USAID' (Donor)

Donors do not have clear policies or guidance for intermediaries on partnering with NNGOs.⁵⁵ This is cited by NNGOs as their biggest obstacle and can mean that intermediaries have different terms and conditions for them, even though the original donor is the same.⁵⁶

Donor policies and procedures are complex for any recipient. INGOs often have specialist personnel in their head offices or in Juba who understand specific donor requirements, while NNGOs do not have such specialised capacity/personnel.⁵⁷ NNGOs receiving indirect funding still have to comply with donor regulations and are reliant on the intermediary for support on compliance.⁵⁸

Little/no transitional planning

After independence in 2011, international agencies started to think about strategies for transitioning implementation to local actors and downsizing operations. The renewed violence at the end of 2013 took South Sudan back into humanitarian crisis and, subsequently, few agencies have any sort of transition

plan or strategy.⁵⁹ INGOs have been starting to ramp up their funding to NNGOs since 2016,⁶⁰ but are taking a cautious approach.⁶¹

Perceptions of NNGOs

'Most donors think NNGOs cannot manage procurement' (NNGO)

The perception exists within the international community that NNGOs are better suited to development work rather than humanitarian work.⁶²

This is based, in-part, on some NNGOs having originated from a development agenda due to the history of South Sudan's funding prior to 2013.⁶³ This perception is shifting due to international organisations' access being inhibited by security concerns and the need to use NNGOs to reach these areas.⁶⁴

There is a lack of evidence as to what funding structures provide better programme effectiveness, which could help convince international agencies to change their perceptions of NNGOs. One intermediary, which was clearly an advocate for NNGO funding, wanted more evidence to show which option would be better: funding a large number of NNGOs that are closer to the communities with small amounts; funding fewer NNGOs with larger amounts; or continuing to fund INGOs.⁶⁵

'Donors feel confident that INGOs from their country of origin are able to scale-up and respond, and they therefore provide them with funding' (NNGO Consultative Meeting)

The number of NNGOs has increased in the last few years.⁶⁶ The NGO Forum reported having approximately 205 national members, while a UN agency reported they now have more than 300 NNGO contacts.⁶⁷ Potential funders have a lack of detailed

51 NNGO Consultative Meeting.

52 KII donor.

53 A Data Universal Numbering System (DUNS) number is a number given to organisations to be registered for potential US government contracts.

54 KIIs NNGO, INGO, donor.

55 KIIs NNGO, NGO Forum, donors.

56 NNGO Consultative Meeting.

57 KIIs INGOs.

58 KIIs INGO, NNGO.

59 KIIs NNGOs, INGOs, donors.

60 KIIs INGOs.

61 KIIs INGOs.

62 KIIs UN, INGOs and donors.

63 KIIs NNGO, other stakeholder.

64 KIIs donor, other stakeholder.

65 KIIs UN agency, donor.

66 KIIs INGOs, other stakeholder.

67 KIIs UN, other stakeholder.

knowledge about these NNGOs as they may not always be very visible at national coordination mechanisms,⁶⁸ or aware of the **importance of visibility**.⁶⁹

Some informants stated that there is a belief that INGOs are more impartial as they do not have personal involvement in the community or links with local government.⁷⁰ There is also a perception that NNGOs have less advocacy power with government/authorities at the local level, potentially leaving them more exposed.⁷¹

'The notion that NNGOs don't have the capacity to deliver services – is a notion from international actors' (NNGO)

Fraud and corruption

South Sudan is ranked 179 out of 180 in Transparency International's Corruption Perception Index.⁷² NNGOs accept that there are a few 'bad eggs' that have caused NNGOs to be viewed as corrupt. Without a greater ability to communicate to donors directly and increase their visibility, such stigma is likely to continue. From the intermediaries' point-of-view, there is a problem – INGOs have ongoing fraud/corruption cases with a minority of NNGO partners.⁷³ Even if NNGOs are carefully selected, intermediaries are cautious of taking on more NNGO partners. One international informant stated there may be some fear that an NNGO may 'expose' an INGO or funder (not just related to financial risk).⁷⁴

Short-term funding that may not cover overheads, nor help build internal management systems

Available funding is short-term (with the majority of agreements lasting between three and 12 months), meaning that it is difficult for NNGOs to build their internal systems and strengthen their management/back-office.⁷⁵ The constraints on overheads and indirect costs exacerbate the situation (see section 2.3). Very little funding that comes to NNGOs allows the purchase of assets, which means they must use their unrestricted overhead funding; however, not all

intermediaries provide such unrestricted overheads, and indirect costs allowances are restricted by the policies of the intermediaries' donor.⁷⁶

In two cases NNGOs used their unrestricted overhead funding to pay for direct implementation costs not covered by the intermediary. Funds were directed to the projects as they wanted to ensure services continued in those communities.⁷⁷ When donor funding is long-term, some INGOs have longer-term funding partnerships with NNGOs. Such partnerships will have annual budgets and hence amounts may vary year to year.⁷⁸

Box 3: Good practice example

An INGO commits to working with NNGOs for several years, developing a Memorandum of Understanding (MoU) with each NNGO outlining overall commitments. The funding given to the NNGO may change annually, but the NNGO is aware there will be continued support over a longer period.

Inconsistent funding creates uncertainty

The short-term nature of the funding described above also causes NNGO funding to fluctuate considerably almost month to month. NNGOs may hire staff and develop their systems but this may not be sustainable. NNGOs are therefore pushed into being reactive to changes in funding situations rather than preparing in advance. As with any organisation, cash flow becomes a priority in such a fluctuating situation.⁷⁹

Difficult communication and engagement

'INGOs and NNGOs have different priorities and often speak a different language' (INGO)

Many intermediaries engage with the NNGOs both in Juba and at the field level through their field offices.⁸⁰ NNGOs have little contact/engagement with donors,⁸¹ making visibility more difficult and meaning that donors may not have a full picture of the NNGOs'

68 KII UN agency.

69 NNGO Consultative Meeting.

70 KIIs other stakeholders.

71 KII donor.

72 See www.transparency.org/news/feature/corruption_perceptions_index_2017

73 KIIs INGOs.

74 KII INGO.

75 KIIs INGOs, donors, NNGOs.

76 NNGO Consultative Meeting, KII donor.

77 KIIs NNGOs.

78 KIIs INGO, NNGO.

79 KIIs NNGOs, UN agency.

80 KIIs UN agencies.

81 KIIs donors, NNGOs.

issues, challenges and strengths.⁸² Donors do want more engagement with NNGOs, but are restricted by their own human resource capacity limitations.⁸³ Outside of the cluster system, NNGOs find it very difficult to find contacts, communicate with key stakeholders and/or show their capabilities and results.⁸⁴

'I go to Logali House on the weekend to network with INGO workers whilst they are socialising; I give them my business card and then follow up in the week' (NNGO)

Large numbers of NNGOs; limited funding

The risk aversion of many intermediaries means that NNGO funding remains small. NNGOs are caught in a dilemma – short-term funding in small amounts means they cannot develop the internal systems and structures that would enable them to get greater funding.⁸⁵ The huge number of NNGOs provides diversity and allows more locations to be serviced. However, it is difficult for an intermediary to get to know all NNGOs and gather evidence on their track records⁸⁶ and donor offices do not have the capacity to deal with a large number of small grants.⁸⁷

Human resource turnover and 'brain drain'

Once NNGO workers have received training and improved their skills they often get jobs in INGOs and the UN, immediately weakening the NNGO.⁸⁸ Salaries and benefits are much greater for INGOs and the UN,⁸⁹ and there is a lack of standardised salaries for the same positions across organisations.⁹⁰

Lack of NNGO leadership in funding

NNGO cluster co-leads only exist at the state level, not at the national level, where there is more influence on funding decisions. As detailed above, NNGOs are not involved or engaging in any other prioritisation/management of funds outside of the cluster system.⁹¹

82 KII NNGOs.

83 KII donors.

84 NNGO Consultative Meeting.

85 KII other stakeholder.

86 KII UN agency.

87 KIIs donors, other stakeholder.

88 KII UN agency.

89 KIIs UN agency, NNGOs, INGO.

90 KII other stakeholder.

91 NNGO Consultative Meeting.

2.2 Partnership quality

This section covers how intermediaries and donors are partnering with NNGOs. The researchers have classified the types of partnerships noted, how monitoring, evaluation and learning on NNGO funding is happening, and how information about funding opportunities is shared. Examples of positive partnership experiences noted during interviews have also been documented.

2.2.1 Type of partnerships

Interviewees reported a number of different partnership arrangements between UN agencies, INGOs and NNGOs. There were no direct partnerships between donors and NNGOs reported; all donors reported very little contact with NNGOs. The overall types of partnerships are listed in Table 3 below; each individual partnership could also be a mixture of these types. Most partnerships fell into the 'funder supported' type, with some reported to be of a more mentoring, supportive and process-driven type. The mentoring approach is new in South Sudan for many INGOs, even if such an approach is part of their global mandate. INGOs noted an increasing trend of having longer-term partnership agreements with more NNGOs, where capacity strengthening is written into agreements. Very few agencies stated that they had a partnership and/or localisation policy. Support from all agencies was often focused on training NNGOs on the funding agency's policies and procedures. **All agencies (intermediaries and NNGOs) find it difficult to start new partnerships.** New NNGOs found it hard to find ways of directly interacting with the right person within potential funders or creating new partnerships.⁹²

Box 4: Mini case study

In 2013, an INGO and NNGO bid as a consortium for Health Pooled Fund (HPF)⁹³ funding. The INGO bid as the lead, responsible for financial management, and provided pre-financed funding to the NNGO. The INGO's goal was to slowly transition out of the project, and for the NNGO to take over all responsibilities. By the second round of HPF's funding (2016), this transition had been successfully completed, with the NNGO bidding and winning as the lead contractor.

92 This section has been developed by collectively analysing all KIIs across all stakeholders.

93 HPF is a multi-donor health and nutrition programme covering 80% of the country. Running since October 2012, the lead donor is DFID. For more details, see www.hpfsouthsudan.org/

Table 3: Types of partnerships

Type	Features (analysis of KIIIs)
Collaboration	<p>Usually an intermediary–NNGO relationship, where the partnership is about sharing information and communication, rather than an allocation of funding. There may be a formal MoU in place, or it may be a more informal/ad hoc relationship. The intermediary may also be looking to hand over programme activities to the NNGO after the emergency has subsided. Examples included:</p> <ul style="list-style-type: none"> • Sharing project information when working in different sectors. • Providing the NNGO with one-off training courses. • Sharing resources (e.g. internet access) or hiring NNGO resources (e.g. transportation) in the field.
Consortium	<p>NNGOs are a member of a consortium of INGOs and NNGOs. The lead is always an INGO. Some NNGOs have reported a partnered approach to the consortium – for example, being involved in the proposal development for the donors – and others have reported a more transactional, supplier of services approach, where the NNGO will receive fixed amounts for implementing certain parts of the project. Such a partnership is also seen as a sub-contractor relationship. In all cases, communication to the donors goes via the INGO.</p> <p>One example was reported where an INGO-NNGO consortium led to the NNGO taking over all aspects of project management and implementation (over a period of a few years). None of the consortium-based structures had a clear partnership and/or localisation policy.</p>
Funder supported	<p>An INGO, UN agency or humanitarian funding mechanism channels funds to an NNGO. NNGOs reported a range of different experiences, with some working more as suppliers of services (a sub-contract), rather than as a partner in the project. In such cases NNGOs report that they are used for filling gaps where the INGO/UN agency cannot access locations.</p> <p>In such relationships, the funders have a due diligence process (sometimes called a capacity assessment). The majority will provide training in their individual grant management, procurement and financial management processes.</p> <p>The SSHF and the RRF were both noted as funder-supported processes in which the NNGOs felt they were able to engage and coordinate. Both funds have a priority to increase partnerships with NNGOs, but neither have a partnership or localisation policy. The main issues reported by NNGOs were the lack of NNGO authority in the final decisions on funding and the lengthy process in getting funding from the SSHF.</p>
Mentoring and supportive	<p>INGOs and UN agencies have been working on longer-term approaches to partnerships. Several NNGOs reported UNICEF as providing longer-term collaboration and support. Relationships are mutually supportive, where the intermediary utilises the expert knowledge of the NNGOs, and in turn may build NNGO capacity on donor fund management and specific skills/knowledge for delivering the activities.</p> <p>Intermediaries conduct some form of due diligence/capacity assessment and both parties will have a formal partnership agreement covering multiple years. The partnerships have clear capacity plans combining training and on-the-job support. Intermediaries reported having a more advisory and supporting process-driven role, helping the NNGOs to implement the project(s). Two intermediaries reported that they involved the NNGOs in all parts of the programme management cycle.</p>

2.2.2 Monitoring, evaluation and learning

Apart from funding provided by the RRF and SSHF, major donors are not keeping track of the amounts of funding NNGOs indirectly receive and neither are they monitoring the types of partnerships happening between their intermediaries and NNGOs. Both are due to the lack of donor capacity to monitor

second tier funding.⁹⁴ Intermediaries all monitor the implementation of the NNGO activities they fund via technical and financial reports; many also actively conduct field monitoring visits of their NNGO partners.

⁹⁴ KIIIs donors, NNGOs.

NNGO performance databases exist in both INGOs and UN agencies,⁹⁵ but these vary in the types of information held. One intermediary keeps a comprehensive, internal database of NNGOs that covers those the agency has previously partnered with and new agencies that have been identified. There is also a movement towards UN agencies starting to report previous experiences of NNGOs via a shared database; this is a work in progress.

The performance of NNGOs, including intermediary–NNGO partnerships, is not being fully evaluated. Many intermediaries discussed NNGO performance based solely on financial compliance. Very few discussed conducting independent evaluations of NNGOs; one UN agency is carrying out a performance evaluation of NNGOs, but this was the only reported example of a holistic evaluation of NNGO performance.⁹⁶ As previously mentioned, there is a lack of evidence in South Sudan around what funding mechanisms provide better programme effectiveness.⁹⁷

Learning events do occur with specific intermediaries, such as partnership meetings at the national level. However, there is little inter-agency learning and few events specifically aimed at improving future partnerships with NNGOs. INGOs do share the learnings from NNGO partnerships at NGO Forum meetings; however, this is not a structured ongoing conversation. Some INGOs provide very focused support and learning on site, with one agency co-locating in their partner NNGO's office.

2.2.3 Sharing information

There are various ways in which funding information is received by NNGOs:

- NGO Forum
- clusters
- direct contact with the INGO or UN agency
- newspapers
- professional and personal networking.

The vast majority of NNGOs hear about funding through the NGO Forum or through the clusters (for example RRF and SSHF opportunities are advertised through the cluster coordination meetings), meaning that NNGOs must engage with them. UN agencies put out calls for proposals either via their own mailing list or newspapers, as well as through the NGO Forum and clusters. Some information is

95 Kills INGOs and UN agencies.

96 Kills INGOs, UN agencies.

97 Kills UN agencies, donor.

Box 5: Examples of a positive partnership experience

INGOx (a faith-based organisation) supports a total of 13 NNGOs and has had long-term partnerships with ten of them. INGOx knows it is hard to find partners that meet all the requirements of a donor. INGOx found a small NNGO working with the community in a hard-to-reach location. The NNGO had a clear vision and values, but had few systems in place. INGOx supported the NNGO for several years and its projects have been very effective. INGOx now does not need to provide much support to the NNGO. INGOx will be attending the NNGO's annual meeting, where there will be 900 members attending, the costs of which are covered by the members.

A UN agency has empowered and built the capacity of NNGO programme staff through mentoring and capacity building, complementing the funding it provides for the NNGO's activities.

A consortium involving an INGO and several NNGOs had a challenging time during start-up due to a combination of different organisational values and the pressures of a new project. The INGO deployed a full-time partnership coordinator to help improve the relationships and provide greater support to the NNGOs. The coordinator has been able to respond to the NNGOs' needs and learning gaps.

INGOz has co-located their staff in the offices of their NNGO partner, working hand-in-hand with the NNGO, and strengthening the relationship to an extent which would not be possible through remote management. Co-location is the direction INGOz wants to proceed with all NNGO partnerships.

shared via networking; however, this was the least popular method mentioned by both international agencies and the NNGOs.

2.3 Overheads and real costs

Policies on overheads vary and there is no clarity on what should be provided or what NNGOs need. The majority of UN intermediaries interviewed provide NNGOs with unrestricted overhead funding at a

standard 7% of the project budget.⁹⁸ One mentioned helping NNGOs distinguish where national-level staff can be placed as indirect costs (being those staff that help maintain the organisation's support to the field) as opposed to overheads. NNGOs have, however, reported that there are several UN agencies that provide no overhead costs. This puts additional pressure on NNGOs to cover the cost of their administrative support or the critical assets needed for projects (vehicles, laptops or other equipment that is usually not covered by the available short-term funding). All intermediaries provide indirect project support costs to NNGOs; however, it was unclear if all INGOs also provide funding for overheads⁹⁹ – informants cited that donor policies govern their policy to NNGOs. No donor has an understanding of what overheads their suppliers allow NNGOs; one donor knew that NNGOs were being pressurised by intermediaries to reduce their indirect costs. The data set received from intermediaries showed that only some agencies were able to segment NNGO funding by direct costs and overheads, a potential indication that not all intermediaries are regularly monitoring overhead levels.

NNGO real costs are not fully covered due to the high operational costs in South Sudan, and a lack of flexibility to cover all the administrative costs of running an organisation.¹⁰⁰ South Sudan has high operational costs with very few goods available at the sub-national levels; items need to be transported from Juba or from neighbouring countries, and with a lack of decent road network, supply chain costs are high. The majority of intermediaries acknowledged that NNGOs face difficulties covering their administration costs. Many NNGOs report having trouble covering the real costs of their implementation, making it even more difficult to justify administrative or support costs in budgets. Some INGOs will utilise available unrestricted funds to help NNGOs cover their real costs. However even when intermediaries are providing some overheads, NNGOs reported using this for programming activities instead. One NNGO used their unrestricted funding to keep a health facility open; others used it to cover the increasing transport costs in South Sudan. Obtaining additional funds to cover such changing operational costs requires NNGOs to have excellent negotiation skills.

98 KII UN agencies.

99 This is partly because programmes and grant staff were interviewed, who may not know exact details of the grant arrangements.

100 The researchers recognise that real cost coverage intermediaries may also be a challenge, however it was not part of the research.

2.4 Capacity strengthening

This section covers current capacity strengthening approaches for NNGOs in South Sudan, and also identifies gaps in their capacity.

'A new NNGO is learning on the job, rather than having the skills themselves, as few people are around to help them. These NNGOs are competing in the same space as INGOs that have been in South Sudan for decades' (NNGO)

2.4.1 Capacity strengthening approaches

Capacity is often talked about in terms of training provision and all intermediaries provide training to NNGOs in grant management and reporting areas (financial and technical).¹⁰¹ This training is specific to the intermediary as it is based on their reporting and financial systems,¹⁰² and NNGOs may attend several training courses on similar topics. Training courses on intermediary grant management processes are seen as useful, especially for new NNGOs receiving funding, as it helps them receive funds more efficiently and avoid unnecessary administrative errors.¹⁰³ Humanitarian funding mechanisms (SSHF and RRF) provide training in proposal writing, financial management, log frames and reporting systems. Such training has been coordinated through the cluster system and has included elements such as practical exercises on critiquing example assessment reports or proposals.¹⁰⁴ In addition to this, SSHF and RRF provide one-to-one mentoring, either in Juba or in the field.¹⁰⁵ Intermediaries have also provided bespoke training courses for NNGOs, reacting to needs as they arise. Examples given include:

- safety awareness training
- WASH
- monitoring and evaluation.

'We are all guilty of mishandling the duty of care' (Donor)

Due to the increase in attacks on aid workers, intermediaries are spending more time providing security training to NNGOs. Interestingly, this was brought up by almost all intermediaries and donors,

101 KIIs NNGOs, INGOs and UN.

102 KII INGO.

103 KIIs NNGO, UN agency, donor.

104 KIIs NNGOs, UN agencies.

105 KIIs NNGOs, UN agencies.

but not mentioned by NNGOs.¹⁰⁶ As many NNGO staff are based in hard-to-reach locations, the available training does not cover everyone who needs it.¹⁰⁷ The International NGO Safety Organisation plans to provide security training and advisory services to NGOs in South Sudan in 2018.¹⁰⁸

Individual clusters have provided training on specific topics; those cited include mobile data collection and conducting initial rapid assessments.¹⁰⁹ To help build NNGO organisational capacity and systems, several INGOs have employed full-time staff to work with and mentor their NNGO partners on-site and remotely. One INGO has created an online platform, focusing on procurement and financial systems, for the NNGOs to learn by themselves, with support from an in-country member of staff. Another INGO has set up a Skype group for NNGOs to get rapid answers to questions, which also allows NNGOs to learn from each other. Such a solution also helps to counteract the negative impact of staff turnover in either INGO or NNGO.¹¹⁰

The NGO Forum has a calendar of training on topics including leadership, monitoring and reporting, camp coordination and camp management, and food security. Recently the NGO Forum has also started to provide training on sexual exploitation and gender mainstreaming.¹¹¹

2.4.2 Capacity needs

Capacity strengthening is more than just training. UN agencies and INGOs have their own capacity assessment tools to ascertain the capacity needs of NNGOs but the NGO Forum's OCAT – a self-assessment tool – is a step towards having a standardised method of assessing NNGO capacity¹¹² (at present it is the only standardised tool available).

Although NNGOs stated that the available training has been very helpful, it is driven by intermediaries and focuses on managing current grants, so does not directly help increase NNGOs' ability to gain

more funding.¹¹³ There is no systematised approach to developing the capacity of NNGOs; very little is documented on their capacity requirements and which organisation(s) are supporting such requirements.¹¹⁴ South Sudan has not benefited from any global schemes such as the Disaster Emergency Preparedness Programme (DEPP) Talent Development Project (TDP),¹¹⁵ and there was no mention by interviewees of learning schemes on the Core Humanitarian Standards (CHS).

There has probably been too much focus on training courses for NNGOs and it would be beneficial to begin to include mentoring and bespoke support to NNGOs.¹¹⁶ Capacity is also about staffing – all agencies (whether INGO, NNGO or UN) have unfilled positions and have difficulties retaining staff.

Management and leadership capacity was stated by many as a gap in NNGOs, especially as they grow in funding and organisational size.¹¹⁷ Informants reported that intermediaries need to help NNGOs grow from being led by a single person to being managed by a set of staff.¹¹⁸

Intermediaries often cited institutional capacity, in terms of key organisational systems (for example human resources, procurement and financial systems), as an NNGO gap that requires substantial work,¹¹⁹ especially if funding is increased. However, very few intermediaries are committing time or resources to improve this, and some had an expectation that such capacity should already be in place. Others that work on longer-term partnership agreements work with the NNGOs to improve these capacities. NNGOs cited specific INGOs helping them to gradually develop organisational systems, but there is no systematic approach to this. The NGO Forum is building NNGO financial management capacity, planning to train 100 NNGOs in QuickBooks.¹²⁰

106 KIIs INGOs, NNGOs and UN agencies.

107 KIIs INGOs, donor.

108 See www.ngosafety.org/news/INSO_to_open_in_South_Sudan

109 KIIs NNGOs.

110 KIIs INGOs.

111 KIIs INGOs and NNGOs.

112 See <http://nngocaptool.southsudanngoforum.org/pages/message>

113 NNGO Consultative Meeting.

114 KII INGO.

115 The aim of the TDP was to build the local capacity of 1,165 national aid workers in three regions that are frequently affected by natural disasters and emergencies; however South Sudan was not a priority country.

116 KIIs NNGO, INGO, other stakeholder.

117 KIIs INGO, donor.

118 KII donor.

119 KIIs INGOs, UN agencies.

120 KII INGO.

There may also be a benefit in investigating the capacities of civil society organisations. Between 2009 and 2013, donors emphasised strengthening civil society; for example, USAID’s Building Responsibility for Delivery of Government Services Program (BRIDGE) backed community action groups to support their own communities.¹²¹ Funding and support in South Sudan has shifted from civil society to NNGOs,¹²² and less programming of this nature exists in 2018.¹²³

2.5 Potential for change

The majority of NNGO funding comes from intermediaries; to significantly increase this, INGOs and UN agencies state that changes are needed in donor policies to help them facilitate greater fund disbursement.¹²⁴ This includes providing more multi-year funding opportunities – where this has happened, INGOs and NNGOs have been able to develop good partnerships and INGO funding to NNGOs has increased as they concurrently build their capacity.¹²⁵ Many UN agency interviewees also stated that the NNGOs need to strengthen their own systems prior to them being able to increase funding.¹²⁶ The SSHF and RRF are already providing large quantities of funding to NNGOs, albeit in small amounts.

‘The field is often forgotten’ (INGO)

The number of NNGOs in South Sudan has grown dramatically in the last few years. Their visibility and ‘brand’ may not be obvious as many work at a community level and/or at a start-up stage. The system must have better, and more easily available, information about NNGOs to enable intermediaries to engage with them. Decision-making is perceived to be focused mainly at the Juba level, and there should

121 Kill other stakeholder (Winrock, 2012).

122 Kills donor, International expert.

123 Kill other stakeholder.

124 Kills INGO, UN agencies.

125 Kills INGOs.

126 Kills UN agencies.

be greater ways of engaging with NNGOs at the sub-national level.

Compliance is a major threat to the success of partnerships, with a small number of ongoing fraud cases reported. To minimise breakdowns, intermediaries report that they could benefit from a way of disaggregating those that have performed well and those that had critical problems. Those with critical problems must also be allowed to find solutions and change, rather than being permanently blacklisted.¹²⁷

There are many good examples of NNGOs partnering with INGOs, UN agencies working with NNGOs and NNGOs working in consortium with INGOs. These should be documented in detail, recording what worked and what could work better in the future.

Many NNGOs are based in communities that are hard for other organisations to reach. This gives them a comparative advantage that may become extremely important in reaching the most vulnerable communities and increasing the affected population reached. The deteriorating security situation makes access and travel more difficult for all implementers, a good reason to facilitate support to NNGOs at the community level and to build their ability to manage funds.

South Sudan’s NNGOs are still quite young; many are less than three years old – they learn on the job and from their mistakes. The majority of their funding comes from humanitarian sources,¹²⁸ as shown in Figure 4. There is a risk of creating funding dependency on short-term humanitarian financing. There is also a risk of overburdening successful NNGOs and underutilising others, hence a balance must be maintained, and opportunities made available for NNGOs to strengthen and improve. It is notoriously difficult to recruit staff in South Sudan, especially in field locations. This requires a change in how NNGO staff are attracted, with better remuneration packages.

127 Kills INGOs, UN agencies.

128 NNGO Consultative Meeting, Kills NNGOs.

3 Conclusions

Funding availability is increasing slowly, but in a vacuum

Although most of humanitarian workers across all agencies are South Sudanese, the amount of humanitarian funding provided to local and national responders in South Sudan is far short of the Grand Bargain's 25% target, with the vast majority of humanitarian funding being directed and used by INGOs and UN agencies. According to NEAR's research, local and national responding actors (including NGOs, government and the Red Cross) received just \$61.9 million in direct funding in 2017, the equivalent of 4.4% of total funds to the crisis captured in the FTS. However, just \$3.6 million of this (0.3% of total funding) was received by local and national NGOs. Based on NEAR's data set, which captured 68% of total funds to the crisis in 2017 and is therefore a partial representation, local and national responders (including NGOs, government and the Red Cross) received a further \$82.9 million in funding through one intermediary, the equivalent of 5.9% of total funds to the crisis. In total therefore, local and national responders received the equivalent of 10.2% (\$144.8 million) of the total funds captured in the FTS either directly, or through one intermediary. Funding to NNGOs via intermediaries is increasing; either through INGOs, UN agencies, the RRF or SSHF. The number of NNGOs being funded is also dramatically increasing, but the total amount they receive is not increasing at the same rate. Every international agency interviewed is trying to provide more funding to NNGOs, but this is not coordinated, monitored or planned (with no evidence of transition planning to NNGOs). By having an individual agency approach, there is a risk of overburdening the successful NNGOs and missing potentially capable NNGOs that are less well known. There is a lack of opportunities for NNGOs to lead implementation themselves (without an intermediary), or to lead a consortium – no consortium is led by an NNGO. With many South Sudanese NGOs in their infancy, the international community has a responsibility to support them in a coordinated and structured manner, which has already begun with the NGO Forum.

Decision-making does not always involve NNGOs, but things are improving

NNGOs are members of the individual clusters, the SAGs, and HCT, and cluster co-leads at the state level. This has not meant they have influence over how funding is prioritised or have greater management of funds, however NNGO engagement is improving through the NGO Forum. Where there are longer-term partnerships in place between an NNGO and INGO or UN agency, the NNGO is involved in project budgeting but the decision on the overall funding amount often lies with the intermediary. NNGOs are not involved in the bigger decision-making processes of changing how funds are allocated. Project implementation information to donors is often controlled by the intermediary, inhibiting the visibility of the NNGOs to donors and other intermediaries. If NNGOs were more visible, it would help to change perceptions of them.

Mixture of mindsets and perceptions

Some agencies perceive NNGOs as a useful resource to be utilised as partners; others see them as gap fillers (suppliers) when international agencies cannot deliver or as being better suited to delivering development projects. There is recognition from many interviewees that if you support NNGOs to do their work, they will do a better job and have fewer issues with compliance/implementation. However, this takes time and effort. To improve perceptions, NNGOs also need more visibility within the system; as for any small actor, this is not easy with a small team.

Donors are focused on intermediaries providing NNGOs with funding

Donors are relying on the UN and INGOs to provide funding to the NNGOs, partly due to their capacity constraints, meaning that the intermediaries both manage the administration burden and carry the

risk. In addition, donors' own in-country capacity to monitor or manage more partners is limited. This makes it unlikely that NNGOs will gain more direct funding from major donors, instead continuing to get their income via intermediaries. Individual amounts to NNGOs are likely to remain small if intermediaries continue with the current level of caution.

Opportunities to harmonise training

There is an enormous amount of training for NNGOs via the UN agencies, INGOs, clusters and other organisations. Given the relative youth of South Sudanese NGOs, this is welcome, but there is a need for the right kind of capacity building (and not just training). Investment in capacity building is driven by individual intermediaries, partnerships between an international organisation and NNGO, or the NGO Forum. There is overlap and not a huge amount of coordination as the same NNGO will get financial management training from several international partners. Successful schemes blend training and mentoring, focusing on NNGO field staff. However, NNGOs will never be able to compete with salary levels in INGOs and the UN, and therefore cannot attract and retain highly qualified staff. NNGOs should be able to budget for specific short-term technical support to help them improve.

Accountability and compliance wins

All donors and intermediaries are risk-averse and do not want funds to be used inappropriately. The caution of intermediaries has a major effect on the amount of funding NNGOs receive, but while fraud and

corruption are important issues to tackle, they are not only issues for NNGOs and affect the whole sector. Transparency is needed by all actors.

On the one hand, NNGOs must ensure they have systems in place that meet the requirements of the international community but they cannot be expected to have these in place without support. On the other hand, donor systems can be difficult and non-standardised, with reporting systems different for each donor, and ways must be found to decrease the NNGOs' administrative burden.

Performance information is not shared

Sharing information on the performance of partners and partnerships is lacking. It is difficult to segregate those doing well, having passed due diligence processes and/or having shown potential for improving, and those that have had issues with fraud and/or corruption.

Real costs are not fully covered

Policies on overheads vary and lack standardisation. While many UN agencies provide unrestricted overhead funding at a standard 7% of the project budget, and INGOs provide indirect funding, NNGO real costs are not fully covered due to the high operational costs in South Sudan and a lack of will to cover all administrative costs associated with running an organisation. There is no clear message coming from donors that would help advocate for improved coverage of NNGO real costs.

4 Recommendations

Immediate

- **Regularly monitor how much funding goes to NNGOs** – have compulsory reporting every six months and develop targets for improvement (targets do not just have to be about the quantity of funding, but could also include capacity or systems development, for example, ‘Establish a structured approach to assessing capacity of NNGOs’).
- **Establish better communication with donors**¹²⁹ – donors should consider holding early market engagement meetings, inviting INGOs and NNGOs, and giving all parties a chance to network. Such events could be coordinated by intermediaries including fund managers.
- **Utilise the results from the NGO Forum’s OCAT to identify NNGO partners and levels of capacity.**¹³⁰ Such practice is happening in Syria, where donors and INGOs accept an already administered OCAT.¹³¹
- **Standardise intermediary policies on overheads** – all should provide some level of overhead; when intermediaries are funding both INGOs and NNGOs, they should provide more to NNGOs. Donors should consider monitoring intermediaries on their overhead policies.
- **Continue to invest in building skills and knowledge** – training needs to continue year after year on key grants/financial management areas, to account for NNGO staff turnover.¹³²
- **Continue to provide technical training** so that project implementation is strengthened, helping to improve target setting and target attainment.¹³³
- **Grow evidence to show NNGO effectiveness** – evaluate the effectiveness of NNGO contracting and performance; learn from the evaluation to improve in the future.
- **Improve NNGO sectoral leadership** – all clusters should have NNGO co-leads at the national level.

Medium term

- **More direction from donors** – donors should provide a clear policy to their implementing partners on proactively partnering with NNGOs, including advice on overheads, provision of capacity development and ensuring NNGOs have longer-term partnership agreements. Future donor calls for proposals should stipulate that INGOs must partner with NNGOs.¹³⁴
- **Change the risk appetite when dealing with NNGOs** – a specific risk framework is required for South Sudan NNGOs, which should be communicated to all intermediaries.
- **Do not wait for the development phase to provide specific NNGO funding** – provide longer-term humanitarian funding for NNGOs. Either establish a separate fund similar to the UK’s Small Charities Challenge Fund (SCCF)¹³⁵ or allow for consortiums led by NNGOs – either way funding needs to be multi-year. Humanitarian donors could also learn from development counterparts on how to work with civil society.
- **Adjust donor compliance requirements or provide more support** – review eligibility criteria for NNGOs, relaxing some that are not easy to prove in the South Sudan context, such as contract sizes or years of experience.¹³⁶ If simplified and standardised reporting is not possible across intermediaries and donors, then ensure the intermediary takes the burden of the administration (for example, to support donor compliance, co-locate staff or second personnel).
- **Develop a better NNGO mapping** – donors should collectively conduct a mapping and capacity assessment to help understand the NNGO landscape. This could include an annual certification or pre-qualification of NNGOs.¹³⁷ However, this must be set up in such a way as to not disqualify NNGOs that have clear values but are still developing their internal systems.

129 Kills NNGOs.

130 Kill donor.

131 Feedback from NEAR.

132 Kills NNGO, UN agency.

133 Kill NNGO.

134 Kills NNGOs, NNGO Consultative Meeting.

135 See www.ukaidirect.org/

136 NNGO Consultative Meeting.

137 Kills NNGO, donors.

- **Create a strategic approach to how NNGOs are funded** – an inter-stakeholder working group involving donors, INGOs and NNGOs could help to develop a more strategic vision for the future and improve communication across actors.
- **Change the approach to capacity building** – coordination of schemes needs to improve. A pooled capacity development fund could be created – that donors or intermediaries could pay into – which would lead capacity development for NNGOs. Donors should consider whether an approach similar to Third Party Monitoring could work, where it is a third-party capacity development scheme. Alternatively, a TDP-style training and coaching scheme could be considered.
- **Share NGO performance information** – to identify the poor NGOs (international or national) and increase funding to those performing well. Those that perform badly must be allowed to find solutions and change, rather than being permanently blacklisted.
- **Be transparent about remuneration** – start publishing salary scale data and allow competitive salaries in NNGO budgets. This could be an anonymised scale coordinated via the NGO Forum.

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Annex 1

Data collection methodology

NEAR's quantitative data collection approach in both the Somalia and South Sudan studies sought to establish the volumes of funds reaching local and national humanitarian actors directly, and through one transaction layer. In addition, the research sought to collect additional data on investments in capacity strengthening, and funding terms with respect to overheads.

Data was collected using the following methods:

1. **Direct funding.** Top line figures on volumes of direct funding reaching local and national NGOs was established through an analysis of funds captured in the OCHA FTS data for 2016 and 2017. It should be noted that large volumes of funds are incorrectly coded or not coded within the FTS data so it is not sufficient to rely on the FTS coding of organisation types. Therefore, a manual data cleaning exercise was undertaken where the status of recipient organisations thought to be wrongly coded or not coded were checked with a Google search on the organisation name to establish whether they are national or international and their categories assigned or re-assigned accordingly.
2. In addition, a complementary direct data collection exercise was undertaken, which targeted local and national NGOs to collect data on funding from the recipient perspective. A simple Excel data collection form was circulated among local and national NGOs requesting information on volumes of funding received by donor source in 2016 and 2017.
3. **Indirect funding through one transaction layer.** A direct data collection exercise targeting funding intermediary organisations was undertaken with a simple Excel data collection form designed to capture volume of funds received by donor source in 2016 and 2017 plus volumes of funds passed on to various types of implementing partner. Data on overheads, the duration of funding, and investments in capacity-strengthening were also requested.
4. The data collection form was adapted from one designed for the Grand Bargain localisation workstream in 2017 and included definitions of organisations agreed within the workstream. Retained from the Grand Bargain form, the NEAR data collection form also included the option to separate out the value of cash transfers and in-kind commodities from the total amount of funds transferred to partners. See a sample of the form below.

Figure A: Data collection form

Q1. Organisation name:		<input type="text"/>			
Q2. What currency would you like to report your data in?		<input type="text"/>			
Q3. What is the starting date of your reporting or accounting period?		<input type="text"/>			
What is the end date of your reporting or accounting period?		<input type="text"/>			
Q4. What was your humanitarian income by source in 2016?		Notes			
Bilateral government donors and the EU					
UN agencies					
CERF					
OCHA-managed country-based pooled funds					
Other pooled funds (pls specify)					
Other pooled funds (pls specify)					
Consortia where you are a subsidiary					
Private donors					
National affiliates / national fundraising offices					
Other sources (pls specify)					
Other sources (pls specify)					
Other sources (pls specify)					
Total					
Additional points to note on how you calculate your humanitarian income:		<input type="text"/>			
Q5. One transaction layer: How much of your total humanitarian expenditure was channeled to partners in 2016?					
Partner type	Total contract value	Value of overheads	Value of cash/voucher elements	Value of in-kind goods	
Multilateral organisations					
International NGOs					
International Red Cross and Red Crescent movement					
International private sector					
Local and national non-state actors (total)					
- Red Cross/Red Crescent National Societies					
- Local and national NGOs					
- Local and national private sector					
National and sub-national state actors					
Internationally affiliated organisations					
Other (please specify/suggest category name)					
Other (please specify/suggest category name)					
Other (please specify/suggest category name)					
Total funds disbursed to implementing partners					
If your systems do not allow you to disaggregate this data, please provide a brief description of your reporting challenges:					
<input type="text"/>					
Q6. Overheads: How does your organisation determine allowable overhead charge rates for local and national partners?					
<input type="text"/>					
Q7. Partnership terms: Does your organisation hold multi-year funding agreements with local and national partners? If not, why not?					
<input type="text"/>					
Q8. Capacity strengthening: Can you quantify your investments in capacity strengthening of local and national partners?					
Transfer of funding for capacity strengthening	<input type="text"/>				
In-kind contributions to capacity strengthening (workshops, etc.)	<input type="text"/>				
Other (please specify/suggest category name)	<input type="text"/>				
Other (please specify/suggest category name)	<input type="text"/>				
Other (please specify/suggest category name)	<input type="text"/>				
If your systems do not allow you to disaggregate this data, or you would like to add further details, including describing non-financial support provided to partners, please describe below:					
<input type="text"/>					

A sample set of target organisations were selected to include:

- Country-based pooled funds.
- UN agencies (excluding UN OCHA, which does not sub-grant to NGOs).
- Red Cross/Crescent organisations.
- INGOs in receipt of donor funds greater than \$1 million in 2016.

Agencies providing data for the South Sudan study collectively received 66% and 68% of the total funds reported to the FTS in 2016 and 2017 respectively and therefore controlled the majority of funds directed to the response (see Table A below). The overall total income captured within the study set (excluding potential double-counting of funds passed from UN agencies and the SSHF to other actors in the study set) was \$881 million in 2016 and \$950 million in 2017.

Table A: NEAR study set as a share of total funds received by first-level funding recipients

	2016	2017
UNHCR	10.0%	6.5%
WFP	41.7%	44.7%
IOM	4.4%	3.0%
UNICEF	5.3%	7.7%
SSHF	4.1%	5.4%
Concern	0.7%	0.7%
Total	66.2%	67.9%

Source: Proportions based on FTS data

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Cover photo: An agriculture club at a school in Gumbo, across the Nile River from Juba. The Food and Agriculture Organization (FAO) worked with Caritas, a national NGO, and other partners on farming projects at schools in South Sudan

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