

HPG working paper

Local humanitarian action during Covid-19

Findings from a diary study

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Acronyms

BLM	Black Lives Matter
CBPF	Country-Based Pooled Fund
CERF	Central Emergency Relief Fund
CSO	civil society organisation
DFAT	Australian Government's Department for Foreign Affairs and Trade
DRC	Democratic Republic of Congo
DREF	Disaster Response Emergency Fund
ECHO	European Civil Protection and Humanitarian Aid Operations
FCDO	UK Foreign, Commonwealth and Development Office
FTS	Financial Tracking System
GHRP	Global Humanitarian Response Plan
HAG	Humanitarian Advisory Group
IASC	Inter-Agency Standing Committee
ICVA	International Council of Voluntary Agencies
INGO	international non-governmental organisation
IOM	International Organization for Migration
JONAF	Jordanian National NGOs Forum
LNGO	local non-governmental organisation
NEAR	Network for Empowered Aid Response
NGO	non-governmental organisation
NNGO	national non-governmental organisation
OCHA	United Nations Office for the Coordination of Humanitarian Affairs
PPE	personal protective equipment
SAD	Santé & Développement
SEJAJAR	Sekretariat Jaringan-Antar-jaringan (Network of Networks of Civil Society Organisations)
STRIDE	Strengthening Response Capacity and Institutional Development for Excellence
UN	United Nations
USAID	United States Agency for International Development
WASH	water, sanitation and hygiene
WHS	World Humanitarian Summit

Executive summary

Background

‘Local’ humanitarian organisations based in areas of crisis are the first to respond to disasters, conflicts and displacement. During the Covid-19 pandemic, these actors stepped up again, delivering medical supplies, food and other relief for those directly affected by the virus and its many secondary economic and social impacts. While Covid-19 spread, local and national actors also responded quickly to crises as diverse as typhoons in the Philippines, Ethiopian refugees fleeing conflict, and fires in the Rohingya refugee camps of Bangladesh. Despite receiving far less recognition, support and funding than their international counterparts, these actors continued to form the backbone of many humanitarian responses during the pandemic.

This study aimed to identify what changes towards a more local aid model were happening in the context of Covid-19 and, where change was not happening, why this was the case. In order to document and analyse change at different levels, both within institutions or crisis responses, this study used a diary method. This approach enabled the authors to understand and document the dynamic politics of change and policy-making. Thirty-two humanitarian practitioners and policy-makers participated in the diary study. Based in humanitarian contexts, as well as in host and donor countries across the world, diarists worked in a variety of roles: 19 were staff of international non-government organisations (INGOs), United Nations (UN) agencies and Red Cross/Red Crescent Societies with a majority from INGOs, and 13 were representatives of local and national NGOs (LNGOs and NNGOs).

Change is happening, but slowly

The study found that five years after the Grand Bargain, global policy commitments on local humanitarian action have been endorsed by an increased number of international actors. Despite these commitments featuring in policies, strategies and plans, this has not translated into meaningful change at country level. The slow pace of change is due, in part, to the length of time it takes to translate policy into practice, but also because fundamental blockages in the system have not been addressed. While many international actors increasingly adopt these policies, in practice they continue to question the capacity of local actors to manage funds adequately, to operate at scale and to uphold humanitarian principles. As a result, there are limited efforts to trial new approaches at scale, take calculated risks and to set in motion new funding approaches.

Progress: changing narrative, changing practice

During the first phase of the Covid-19 pandemic in 2020, the narrative on localisation appeared to shift, with a growing number of INGOs and institutional donors moving from questioning whether localisation should happen to discussing how to do it. This focus on the ‘how’ is an important breakthrough, signifying potential for further changes in policy and practice. While the progress of

localisation within much of the internationally run system remains overdependent upon individual ‘champions’, there are signs that greater institutionalisation within organisations and coordination structures could drive the agenda forward and finally shift practice on a wider scale.

There were also some examples of changes in practice. Diary participants reflected on progress made towards adopting more genuine and equitable partnerships. For some, the most successful partnerships were those based on capacity strengthening, at least initially, with a subcontracting relationship introduced only later. Standout examples, such as the response to Tropical Cyclone Harold – where Covid-19-related restrictions effectively ‘forced’ a more localised response – demonstrated the value of past investment in partnerships and preparedness, effective remote technical support and new space for local leadership. However, such approaches have yet to be observed among many of the sector’s largest international actors, including most UN agencies. Furthermore, while there have been efforts to increase collaboration and the representation of local actors in formal cluster coordination, progress remains slow and inconsistent across different humanitarian responses.

In global policy fora, local and national voices appear louder, in line with a shift towards the principle of ‘nothing about us without us’. The move to virtual online meetings during the pandemic has facilitated greater participation of some local and national actors in such spaces, such as Inter-Agency Standing Committee (IASC) meetings. While questions remain as to whether such participation is translating into influence and power, the presence of local and national actors has helped broaden the overall localisation agenda to include issues around national-level power dynamics, civil society development and the role of national governments.

Outside these internationally dominated coordination and policy spaces, national-level consortia continue to grow their membership and work towards their own objectives, such as peer support and capacity-building of their LNGO members. Rather than waiting for change ‘from above’, some of the main shifts reported for this research concerned LNGOs and other local responders creating alternative response systems that were led by national and local organisations. Similarly, diarists reported that many of the funding mechanisms successful in reaching LNGOs in the last year functioned outside of the formal international humanitarian system.

Enduring obstacles to local humanitarian action

Enduring obstacles to local humanitarian action continue to prevent wider transformation. Donors and international organisations’ perceptions of and attitudes to risk, in particular with regards to fiduciary risks, hamper further progress and many local actors’ ability to access funding. There also continues to be a lack of coordination on due diligence requirements that could enable more partnerships with, and funding to, smaller organisations. The research found no evidence of a move towards more honest and transparent conversations on risk-sharing between donors, international actors and local actors.

Overall funding trends in favour of local responders have not generally improved during the pandemic, and in some cases have reversed, with most funding being channelled through the UN system. While

some donors have facilitated better quality funding through budgeting for local actors' overhead costs, and local and nationally managed pooled funds have responded quickly to humanitarian needs over this period, such positive examples remain small in scope. The lack of direct funding to local actors has continued to limit localisation efforts. Though some large, well-established NNGOs benefitted from repurposed funding for Covid-19 responses, the majority of national and local actors participating in this study reported little change by way of increased or new funding sources. As long as major funders – including the United States Agency for International Development (USAID), European Civil Protection and Humanitarian Aid Operations (ECHO) and UK Foreign, Commonwealth and Development Office (FCDO) – do not significantly change their approaches, isolated positive examples will not alter the underlying dynamics of how the system is currently funded.

International actors' instinct for self-preservation continues to undermine the spirit of the 'localisation agenda'. They continue to hold on to privilege and power, which at times leads to tokenistic approaches. Instead of centring aid delivery systems on local actors, many international actors have pushed for decentralisation within their organisations and nationalisation of their country offices. Both cement the role of international actors and assume space that should be dedicated to local actors. Self-preservation can also be seen in how international actors continue to exclude local actors from certain spaces, including leadership roles and many decision-making fora in formal coordination systems. Although some progress was observed, participants in the diary study repeatedly stated concerns over a co-option of the agenda that would entrench international actors' position of power.

Drivers of change: Covid-19, Black Lives Matter and the Grand Bargain

The Covid-19 pandemic offered an opportunity for progress on supporting local humanitarian action, but its impact has not been transformational. Diarists were split on whether the changes they described over the study period could be attributed to the pandemic. Many believed the response forced the international system and host governments to better recognise the unique role of local actors. Participants reported local actors taking on new or expanded roles in the absence of international actors in-country, but it is unclear whether such instances would lead to a permanent shift in power dynamics or longer-term opportunities for LNGOs. Similarly, diarists also highlighted how Covid-19 has led to more remote monitoring and management, and increased requests for local actors to feed information into internationally led coordination systems, but without a shift in resources to support these expanded roles.

Covid-19 was just one of many factors that drove progress on localisation in 2020. According to the participants in the diary study, a more important driver has been the increasing prominence of the 'decolonising aid' agenda, which gained renewed momentum across the humanitarian sector following the Black Lives Matter (BLM) protests around the world. Just as BLM supporters drove conversations around systemic racism in society, advocates in the aid industry also highlighted the legacies of colonialism and current racist practices in the sector. For INGO participants in the diary study, this forced an urgent rethink of current practices and relationships with local partners. While there were regional variations in how often the decolonising aid issue was raised as a driver of change,

with a greater frequency in Anglophone donor and INGO capitals, there was a growing sense that not changing practices was a greater reputational risk. Some respondents also proposed that these incentives have led to INGOs needing to localise out of necessity, for reasons of self-preservation. This factor likely explains the inconsistent approaches observed in this study, such as a drive toward a more decentralised model of working, alongside localisation commitments.

Some shifts are also the result of longer-term initiatives and advocacy started as part of the Grand Bargain. The Grand Bargain localisation commitments, in particular the commitment that 25% of funding globally should go as directly as possible to local actors, were not fully met. However, they did help maintain a policy focus that has developed into a wider agenda driven by a broader group of stakeholders than those in the formal Grand Bargain process.

Conclusion and recommendations

A more locally led aid response model requires a more radical shift than that which occurred during 2020. The recommendations below are key actions that can accelerate the reform and change needed.

To donors

- **Develop a clear and ambitious localisation strategy** outlining the changes in donor policy and practice required to support change, including establishing incentives to support reform among international partners, in particular UN agencies.
- **Hold international partners accountable** by tracking, monitoring and evaluating the cascading of quality funding (i.e. equal distribution of overhead costs and adequate coverage of risk management, including security provisions), the quality and equity of their partnership practices, and commitments to capacity-sharing that are coordinated and informed by local actors' priorities and added value. Ensure these factors are reflected in donor policies and strategies.
- **Hold yourself accountable** through convening and creating space for direct dialogue with the local actors that you indirectly fund.
- **Develop a risk-sharing agenda across donors** and harmonise due diligence, compliance and audit requirements. This requires engaging in an honest dialogue at senior political levels and clarifying acceptable levels of residual risk.

To UN agencies and INGOs

- **Be accountable to the commitments you have made** on localisation by establishing transparent mechanisms to track funding flows (in terms of both quantity and quality) to local actors. In addition, systematically evaluate the quality of your partnerships, including through partnership audits and reviews focused on the experience of local actors.
- **Localise coordination** through adapting it to context and existing structures. This can be done by analysing existing local coordination systems to inform international coordination deployment if needed, as well as locating coordination closer to affected people and decentralising decision-making.

- **Redefine your role and identify your added value** in supporting existing local capacity, action and leadership in humanitarian responses in order to reinforce and not replace or undermine existing local response mechanisms and resilience. This will help ensure complementarity.
- **Recentre your objective on what is best for people affected by crises** and not what is best for the survival of your organisation.

To the Grand Bargain process

- **Propose an ambitious agenda on localisation based on creating the right incentives for reform and change at the global level**, as well as implementing the myriad recommendations that already exist. Focus on the role of donors in setting these incentives and the role of UN agencies in shifting their practice is necessary – they hold the majority of power over funding decisions.
- **Be driven by local actors' voices, experience and realities**, including through expanding efforts at the national level to hold dialogues and support nationally driven localisation strategies.

To funders and supporters of locally led approaches

- **Support local action and activism outside of the formal system**, in particular locally led and managed pooled funds, networks of local actors, coordination of local actors through direct funding, visibility, and extending your platform and influence in solidarity.
- **Continue reshaping and redefining the conversation on locally led humanitarian responses outside of the formal Grand Bargain process** to influence global policy discussions for a more ambitious reform agenda in the humanitarian sector.

To well-established large national organisations

- **Critically assess your own power and the power dynamics in your countries to ensure a diversity of local actors can play their role in humanitarian responses**, in particular smaller and very localised organisations and those representing people who are often socially excluded, such as those representing women's rights, people with disabilities, older people, people of diverse sexual orientation, gender identity and expression and sex characteristics, as well as refugee-led organisations.

1 Introduction

1.1 Background

As with every humanitarian crisis, ‘local’ responders were the first to respond to the Covid-19 pandemic. Across the world, individuals and organisations in crisis contexts distributed medical supplies, food and other relief for those directly affected by the virus and its many secondary economic and social impacts. When new disasters, conflicts and displacements occurred alongside the pandemic, local and national actors also continued to provide the backbone of many humanitarian responses. As the role of such actors became increasingly recognised, pre-existing demands for a more locally led global humanitarian system gained new urgency. The idea that the humanitarian aid system – still largely led by donor governments, UN agencies and INGOs – should undergo ‘localisation’ long predates the pandemic and has proven controversial.¹ Since the World Humanitarian Summit (WHS) of 2016, much of the sector’s focus on localisation has centred on the Grand Bargain, a set of 51 commitments from an initial 18 donor countries and 16 international aid organisations, which today has 63 signatories, including national organisations. While signatories aimed to improve the efficiency and effectiveness of humanitarian aid, including providing more support and funding for local and national responders,² substantive progress and practical implementation of these goals has proven an uphill struggle.

The Covid-19 pandemic differed from other crises due to its global nature and concurrent impact in a large number of countries, and a high proportion of global recorded deaths concentrated in Europe and North America. To manage risks, many aid workers were evacuated from crisis-affected countries or locked down in their offices in capital cities, undermining the international crisis response system in existing humanitarian crises. In new crises and disasters, travel restrictions and disruptions to humanitarian supply chains meant the usual surge model of international aid response – a model often criticised by localisation advocates – was not an option in many cases. In such a context, there was much speculation that the pandemic would offer opportunities to fast-track progress towards more local aid delivery models, as the roles and contributions of local actors and local response systems (including governments) were placed centre stage while the international humanitarian system remained constrained.

1.2 Scope

This study³ aimed to identify what changes towards a more local aid model were happening in the context of Covid-19 and, where change was not happening, why this was the case. Based on interviews and diary entries from local and international aid practitioners, this study sought to test the hypothesis that the impact of Covid-19 and its restrictions would act as a catalyst for localisation, asking: **how is the humanitarian system adapting to support a more local humanitarian action in the Covid-19 context?** The study explored whether and how local actors are being supported by other local actors, international actors and donors, and whether, how and why relationships between various actors at different levels in the humanitarian system were changing. It considered the experiences and

perceptions of different actors around the challenges, opportunities and changes in how the system is operating during the Covid-19 pandemic, as well as the impact of new policies being developed by donors and others to adapt to the changing operational context while responding to ongoing and new humanitarian crises as well as the impact of Covid-19.

1.3 Methodology: a diary approach

In order to document and analyse change at different levels (e.g. within institutions or crisis responses), this study used a diary method. This innovative approach enabled the authors to understand and document the dynamic politics of change and policy-making that happen within institutions and crisis responses. As a regular record usually created soon after the events they describe, diaries can offer a high degree of accuracy and are as such an established methodology in studies of human behaviour, albeit less so in research of the humanitarian sector (Campbell, 2020). Their regularity over a set period also means researchers can compare entries over time and highlight the moments where a change in a process or opinion occurred and why. Diaries can provide direct access to the day-to-day experiences of individual staff in the humanitarian system as well as the progress of change processes that often happen behind closed doors.

Most importantly, because participants directly record their own entries, their thoughts and perspectives are included, and events are framed by those familiar with the wider context in which they take place. This characteristic lends itself especially well to exploring issues of localisation, where there is a broad common understanding of the agenda among participants that nonetheless interacts with their particular role, beliefs, organisation and context in different ways. The degree to which local responders are involved in the planning and delivery of humanitarian programmes across the world's aid responses varies dramatically, and this is influenced by the social and political characteristics of each context. The researchers considered a diary process an effective means of capturing this broad scope of interpretations and perspectives.

Gathering data in this way brought findings that differed from those gathered through interviews. The honest and informal tone of participant's entries tended to discuss issues of power and politics that are often missing from a reform process that has been criticised as being overly technical at the expense of confronting more fundamental issues. A further benefit has been the opportunity to hear some of the more personal and emotional impacts of successes or challenges for humanitarian staff working in difficult circumstances with limited resources. Diary entries gave insight into the weekly schedule of humanitarian colleagues, including how regular 'firefighting' and reactive tasks mean supporting the localisation agenda and other longer-term processes becomes side-lined.

Other research and policy engagements from the last year have also informed the analysis and where relevant are referenced, in particular:

- Key informant interviews with 10 policy-makers and practitioners.
- A case study on the impact of Covid-19 on local humanitarian action in Pakistan and Afghanistan (Ullah et al., 2021).
- An online mapping tool that tracks local humanitarian action and complementarity between local and international actors, including where change has enabled greater localisation (HPG, n.d.; see Box 1 and Figure 1).

The diary study involved the participation of 32 humanitarian practitioners and policy-makers. Based in humanitarian contexts as well as host and donor countries across the world, diarists worked in a variety of roles: 19 were staff of INGOs, UN agencies and Red Cross/Red Crescent Societies with a majority from INGOs, and 13 were representatives of local and national NGOs. Recognising that larger NGOs can experience changes in their relationships with international actors and donors differently compared to smaller local NGOs (see Ullah et al., 2021), no specific trend was identified in the responses of local organisations in line with their size. The 13 representatives of local and national NGOs came from organisations that ranged from large, well-established NNGOs to smaller subnational or local organisations. Given the size of the sample, it is not possible to derive conclusions on how the size of local organisations participating in the diary study affected their experience during the last year.

Diarists were invited to submit a diary entry over email to the researchers at least once a week, for the duration of four months from October 2020 to January 2021. Diarists were given a broad brief of what to discuss in their entry and asked to reflect on their work over the past week, with the various engagements and processes diarists were involved with of relevance to localisation. Diarists were sent a series of prompts that remained the same over the study period, and asked to answer as many questions as they wished. Questions asked participants to describe their feelings about work and details of any successes or challenges, as well as particular facets of the localisation agenda, including whether work has involved discussions and interactions around the role of local humanitarian actors, funding and its implications for local actors, and partnerships. Diarists were also invited to reflect on the context of such discussions, whether it was a formal coordination meeting or informal conversation, and how Covid-19 impacted the nature of these interactions and processes.

To complement these entries, two bilateral interviews with each diarist were planned over the course of the study to go into greater detail on the substance of diary submissions. The data that diarists provided was analysed by researchers and kept securely and anonymously. Volunteers were also invited to talk about preliminary findings with researchers at an informal discussion after the conclusion of the study period. All diary participants were invited to review this report and provide further comments and inputs. These last two activities were aimed at ensuring data was not only collected from diary participants, but participants were able to be part of the analysis of their own data.

Box 1 Covid-19 and local humanitarian action mapping tool methodology

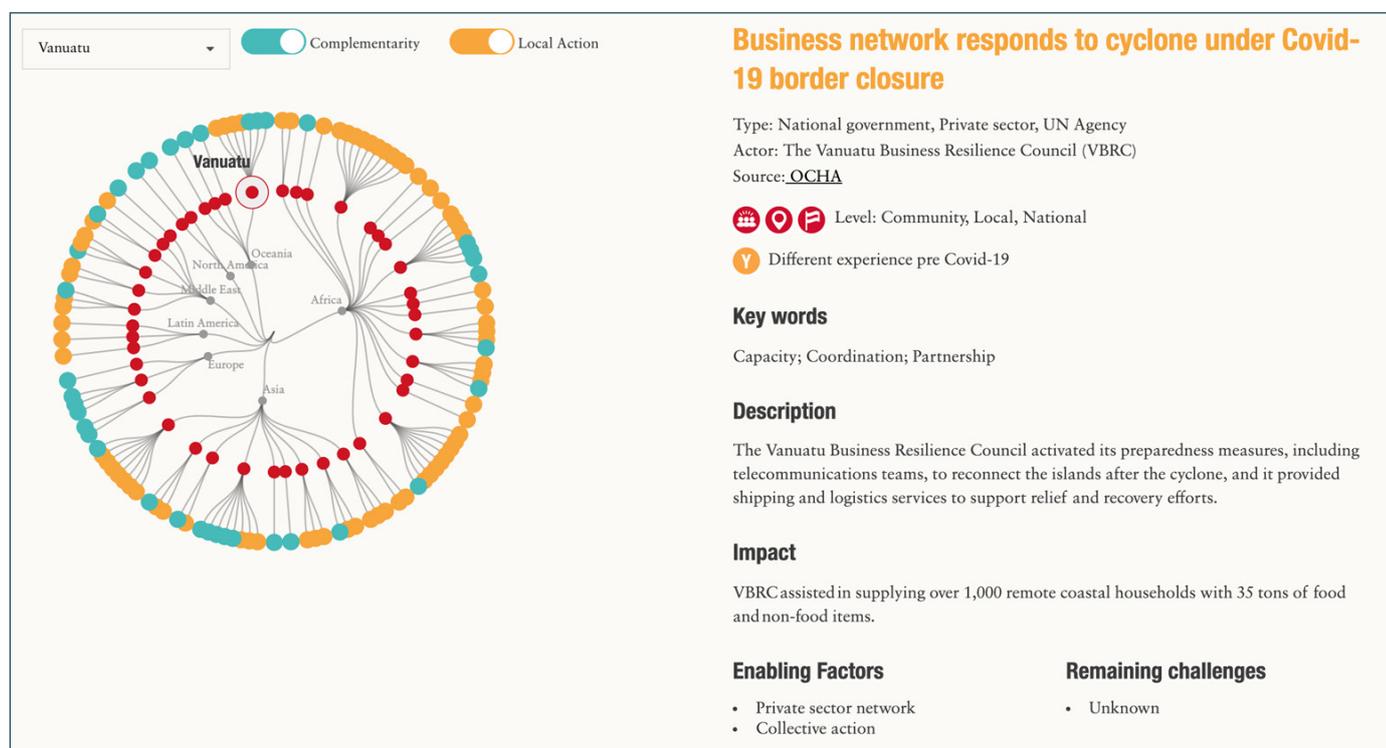
The Covid-19 and local humanitarian mapping tool (HPG, n.d.) documented and analysed how the pandemic might be creating opportunities to unlock some of the barriers to supporting more locally led humanitarian responses and more complementary ways of working between international and local actors.

To do this, data was collected in two ways; it was primarily crowdsourced through an online survey that asked local and international actors to volunteer information on their activities and partnerships throughout the pandemic, focusing on the impact on affected populations, the factors that enabled the response and any remaining challenges. The survey was also sent to targeted organisations to encourage submissions from key stakeholders. The survey data was supplemented with a review of publicly available sources such as press releases, tweets, blogs and reports to gather complementary information.

The data collection ran from June 2020 until March 2021, throughout which the mapping tool was periodically updated.

Capturing evidence of this change in real time was not only important for sharing opportunities and lessons throughout the pandemic, but will inform future programming, funding decisions and detailed lessons learned as well as making a case for future support to national responders.

Figure 1 Example data visualisation from the Covid-19 and local humanitarian action mapping tool



Source: HPG (n.d.)

1.4 Limitations

Though the study benefitted from contributions from humanitarian colleagues based across the world, the small sample size of diarists meant such a group cannot be considered representative of humanitarian organisations or staff as a whole. The working languages of the study were English and French, limiting representation, and language proficiency likely impacted how some contributors articulated their observations and perspectives. Despite the efforts of the researchers there was a lack of representation from humanitarian staff working in Latin America and North Africa. Donors and UN agencies were also an underrepresented group in the diary study, with the gap being partly mitigated through subsequent key informant interviews with donors.

Participants also consisted of humanitarian colleagues already interested in localisation issues, in an effort to ensure a high degree of continued engagement despite the extended length of the study and its relatively high degree of input requested by the researchers. Nonetheless, time and capacity restrictions on the part of the diarists meant they did not manage to submit a diary entry every week, though the frequency of responses was sufficient for analysis. Some diarists sent entries every week while others only sent entries every other week, covering a two-week period. Diarists were also asked to send a note when they felt they had nothing new to report in a week. With the trade-off of a more flexible and

unstructured diary study intended to ensure a retention of participants over an extended period of time, the focus of submissions were understandably broad. On reflection, the discussion of some topics with participants was better served through subsequent interviews.

1.5 Outline of the report

Chapter 2 details what has and has not changed in humanitarian policy and practice on localisation during the pandemic. It looks at shifts in narrative and a greater formalisation of commitments to localise by some international actors, in the face of enduring barriers to such processes, including funding, conceptions of capacity and coordination structures. The chapter concludes by interrogating whether Covid-19 was the primary cause of such changes, and explores shifts in localisation in the context of recent social movements and their impact on the sector.

Chapter 3 discusses the implications of these findings for a more ‘complementary’ humanitarian system that can draw upon the relative strengths and capacities of both international and local actors. Chapter 4 concludes with key recommendations for pushing forward the shift needed to ensure a more local aid model.

2 What is and is not changing, and why?

The huge challenges presented by Covid-19, as well as other important drivers such as the renewed focus on racism in the sector, catalysed localisation's move up the policy agenda in 2020. For many organisations, the discourse around localisation advanced significantly, bringing more substantial commitments and policies from INGOs and some donors. We can also see the results of advocacy efforts as the localisation agenda has become more commonly discussed and adopted. Outside of the often incremental changes of international actors is a sense of the localisation agenda becoming broader than the one codified in the Grand Bargain.

However, those seeking to transform the humanitarian system to become more localised are still faced with obstacles that have proven to be very resistant to change. In that sense, where localisation happens it is in spite of these blockages rather than because these they are being addressed through reform. Covid-19, despite its disruptive nature to the status quo of the system, caused considerable issues for local action and often further entrenched existing inequalities in humanitarian practice and policy. This chapter summarises the extent of change and progress towards localisation in humanitarian action during the Covid-19 pandemic.

2.1 Shifts in narrative from 'whether' to 'how'

In 2020, the narrative on localisation shifted. Since the 2016 localisation commitments of the Grand Bargain, most advocacy efforts and policy debates have combatted a negative narrative in the humanitarian sector that questioned whether localisation was the means to more effective humanitarian action. This hesitancy around localisation led to multiple small-scale efforts, initiatives and pilots rather than more fundamental shifts. In 2020, however, a growing number of international actors, mainly INGOs and institutional donors, moved on from questioning *whether* localisation should happen to discussing *how* to do it. This focus on the 'how' is an important breakthrough, signifying potential for changes in policy and practice in the near future. This is noted in the 2021 Annual Independent Review of the Grand Bargain (Metcalf-Hough et al., 2021: 46):

The breadth and depth of this policy discourse indicate a system-wide normative shift, with the concept of and rationale for localisation no longer in question. But, perhaps predictably, translating this norm into system-wide practice has been slower.

Diarists from international actors reported that critics of the localisation agenda in their organisations were now less focused on 'why we can't do it' and more concerned with both existing barriers to making such an agenda happen, and the eventual implications for the roles of INGOs and UN agencies in a more locally led humanitarian system. Diarists likened this important shift to the change in refrain from 'why partner' with INGOs to 'why not partner', which now appears in several strategies of INGOs (see Box 2).

Box 2 Shifting the mindset: Islamic Relief's transformational leadership towards localisation

Islamic Relief Worldwide started a journey of organisational transformation as part of its commitment to localisation, the Charter for Change and the realisation (specifically in the Asia region) that localisation was no longer optional given governments' policies on crisis response. This journey began with a pilot project entitled Strengthening Response Capacity and Institutional Development for Excellence (STRIDE), which aimed to work in partnership with small to medium-sized local organisations to support their capacity and institutional development for prepare for and respond to natural hazard-related disasters (Wake and Barbelet, 2019).

Islamic Relief Worldwide has further expanded its ambition by creating a localisation taskforce, which includes senior leadership and humanitarian practitioners, to unpack their position on localisation, examine evidence-based practice and design a roadmap towards localisation. Critical to the mindset shift within the organisation was moving away from the question 'why should we do it?' towards 'how should we do it?'. The STRIDE initiative is now in its second phase, which has expanded beyond the Asia region and seeks to inform how the organisation can move further forward on localisation.

With this shift in narrative has come a flurry of technical notes, guidance, position papers and other documents that, for many organisations, have been formulated with senior-level involvement and buy-in. For example, the Covid-19 and local humanitarian action mapping tool highlights the commitment of the Child Protection Area of Responsibility under the Global Protection Cluster and the Global Education Cluster through their 'tip sheet' for cluster coordinators to ensure a more localised response to the pandemic (HPG, n.d.). Some of this policy work has been accompanied by assistance for LNGOs in order to facilitate their participation in such processes for the first time. However, as one INGO diarist explained, although it was felt to be 'exciting that this is becoming central to ... strategic ambitions', the extent of this policy work also demonstrates how 'utterly daunting it is how far we have to travel to get to where we want to be'.⁴ Yet any sense of urgency over the need to accelerate reform efforts is still limited to a small, core group of INGOs that were to varying degrees already invested in the principle of localisation. As one diarist said, 'we have not felt pressure on our commitment ... [my INGO is] comfortable disregarding it'.

International actors' self-interest was cited many times as a key barrier for ceding power, space and changing existing practices, with UN agencies being particularly slow to engage with localisation issues (see Box 3). For LNGOs with generally fewer resources to devote to localisation advocacy (and who are likely to have greater appreciation of the value of localisation), less of a shift was reported. However, both groups agreed there were fewer changes in practice than they had hoped. Respondents were split on whether the system will revert to usual practices, and what the future role of international humanitarian organisations should be in a more localised aid system.

Box 3 Efforts towards localisation within the UN system

Progress towards localisation within the UN system has been mixed. Our analysis found there is little evidence of progress on local humanitarian action by UN agencies beyond the work done as part of the global clusters (particularly protection and education but increasingly other clusters such as water, sanitation and hygiene (WASH)) and smaller, ad hoc initiatives. UN agencies are absent from systematic efforts to shift the aid model towards being more locally led as well as from advocacy, policy discussions and debates on local humanitarian action. This is striking in light of the increasingly vibrant debate among bilateral donors and the long and continuing discussions among and within INGOs.

The 2021 Annual Independent Review of the Grand Bargain (Metcalf-Hough et al., 2021: 57) concludes that: ‘The UN agency group ... presents a mixed picture, with some (e.g. ILO [International Labour Organization], UN Women and WHO [World Health Organization]) much more advanced on localisation than others by virtue of their specific mandates, particularly but not only in relation to their support for local governmental actors.’ The Review also reports that the UN Office for the Coordination of Humanitarian Affairs (OCHA) (by its use of Country-Based Pooled Funds (CBPFs)), the UN Population Fund (UNFPA), UN Refugee Agency (UNHCR), UN Children’s Fund (UNICEF) and World Food Programme (WFP) have declared meeting the target of 25% of funding to local actors. Finally, the Review highlights that UNHCR and UNFPA have agreed new policies to extend a percentage of overhead costs in their partnerships with local actors: 4% for UNHCR and an average of 7.2% in 2020 for UNFPA. UNFPA is also leading efforts to identify local women-led organisations for the UN Partner Portal and tracking funding provided to these organisations.

2.2 The integration of localisation into organisational policies and strategies

Recent changes in the narrative around localisation reflect the results of years of external and internal advocacy by localisation champions including within INGOs and other international structures. These changes may have been hastened by the Covid-19 pandemic. Advocacy efforts appear to have finally led to localisation becoming institutionalised within some international organisations, with commitments made through the Grand Bargain now translated into internal organisational policies and strategies. The long journey from global policy commitment, to internal advocacy, to internal change management processes means that the humanitarian sector is only now starting to embed localisation within organisational practice. Diarists highlighted such shifts at different levels of the system and referred to a number of changes they have observed.

2.2.1 System-level policy progress as part of the Covid-19 response: IASC and donors

Globally, as part of their response to the pandemic, the IASC developed and endorsed a number of proposals and guidance notes that anchor and enable localisation in the future. Interim guidance on localisation and the Covid-19 response was endorsed by the IASC Principals in May 2020 and called for common duty of care and risk practices, better inclusion of local actors in coordination groups and support for ‘wider forms of local engagement’ including community leaders and civil society organisations (CSOs) (IASC, 2020a).

In addition to this guidance, the IASC Principals also endorsed a proposal for a harmonised approach to providing flexible funding in the context of Covid-19, where flexibility is passed down to local and national NGOs (IASC, 2020b). Finally, a proposal to address the inconsistency in unlocking and disbursing funds to NGOs in the Covid-19 response was endorsed in June 2020. It called for strengthened NNGO involvement in planning and coordination processes, including through the role of localisation-focused networks such as the Network for Empowered Aid Response (NEAR), the Alliance for Empowering Partnership (A4EP) and the International Council of Voluntary Agencies (ICVA); direct funding to NGO networks, including country-level civil society mechanisms; and timely and disaggregated reporting of funding flows from UN agencies to NGOs (IASC, 2020c).

Such language was also reflected in OCHA’s Covid-19 Global Humanitarian Response Plan (GHRP), which, in principle, recognised the need to accelerate support to local actors as they maintain their capacity and access to affected people. However, as will be discussed, funding allocations to local actors through the GHRP fell far short (OCHA, 2020b: 51). Similarly, some donors used Covid-19 to introduce further commitments on supporting local humanitarian action. For example, the Australian Government’s Department for Foreign Affairs and Trade (DFAT) ‘Partnerships for Recovery’ policy for Covid-19 includes a commitment to ‘place a strong focus on localisation’ of regional assistance through partner governments and LNGOs, and also developed guidance for partners that includes obligations for those they fund to demonstrate progress on localisation.

2.2.2 INGOs and clusters translate localisation commitments into organisational policies and strategies

Some INGOs are showing signs of translating their global commitments on localisation into organisational policies and strategies, albeit as a result of often long discussions and advocacy. For example, one INGO has in the last year fast-tracked their change process on localisation. As for many of the changes we saw in this study, the discussion on how the organisation was going to move towards more strategic and equitable partnerships from a place of doing direct delivery had started years before. This internal conversation began as a result of the organisation increasingly working in partnerships in certain crises out of necessity, as well as policy conversations on localisation in the sector. In 2020, however, the pandemic combined with the call to decolonise the sector increased the realisation of the INGO’s country directors and technical staff of the necessity of partnering with local actors. This led, within the study period, to the formulation and agreement of reforms, including

a proposal to establish, for the first time, an internal commitment to increase financial support to local actors over the next financial year. Such a shift necessitates ‘immediate behaviour change’ in how partnerships are sought.

Similarly, global and national clusters have also piloted and worked towards translating localisation commitments into standard operating procedures, workplans and strategies, with some global clusters making localisation one of their strategic objectives. As well as providing guidance on how to enhance local participation, local leadership and localisation through the cluster now require reporting on localisation indicators as part of the cluster coordination performance monitoring. One UN agency developed a technical note on localisation for all the clusters it leads, which clarified responsibilities and accountabilities across operational departments. As one diary participant reflected:

For the very first time in my 15 months with [this cluster] I experienced a focused and practical discussion on what [the clusters] can do at global level. [T]his meeting was far removed from the abstract discussions that have happened in the past. ... The most significant outcome of the meeting was that all the clusters agreed to have one common action on localisation on their annual workplan for 2021. The Global Cluster Coordinators will develop indicators to monitor the implementation of the annual plan and will report on the same at the end of the year.

Indeed, OCHA reported in the 2021 Annual Independent Review of the Grand Bargain that progress towards more effective participation, decision-making power and influence for local actors in formal coordination is being made:

according to 2019 data, NNGOs held the fourth-highest number of HCT [Humanitarian Country Team] seats (7%), serving on 21 of 28 HCTs surveyed. NNGOs constituted 43% of cluster members on average, and more than half of clusters indicated that a national/local language was spoken at meetings, with the use of multilingual staff to translate as needed (Metcalfe-Hough et al., 2021: 47).

2.2.3 An uneven process of change

However, the impact of such initiatives remains to be seen and diarists highlighted how certain practices continued to be dominated by international actors. Coordination spaces in general were described as bottlenecks for progress on localisation, with one diarist in Sudan reporting that the coordination system is entirely UN-dominated, with ‘not even INGOs getting an equitable seat at the table, let alone national ones’. Another advocate described how, in many contexts, ‘the situation has barely advanced at all’ in terms of effective LNGO participation and leadership of international and country-based coordination fora, while diarists in Sudan, the Democratic Republic of Congo (DRC) and Myanmar all reported a lack of progress. Further reports from specific clusters in Bangladesh stated that significant change is yet to be felt in terms of equitable partnerships and that local actors were yet to have a role in cluster coordination (HPG, n.d.). Another diarist discussed a lack of formalising LNGO engagement, saying:

Although in almost every meeting, someone remembers [LNGOs] exist and should be engaged, the processes to do so are still very much ad-hoc and changeable.

Within these spaces, respondents continued to express frustration that topics seen as ‘sensitive’ are rarely discussed with local actors and are instead limited to exclusive ‘safe spaces’. Several diarists highlighted the power dynamics at play in the use of such fora, and how LNGOs are particularly underrepresented. Instead, local actors are relegated to more formal meetings with fewer opportunities to discuss failure, common areas of concern and opportunities for advocacy. Such dynamics prevent more meaningful engagement even when LNGOs are included in other coordination systems. The 2021 Annual Independent Review of the Grand Bargain (Metcalf-Hough et al., 2021: 47) confirms that significant gaps remain, highlighting that:

there is still some way to go in terms of empowering local actors to lead/co-lead coordination mechanisms: in 2019, NNGOs held only 8% of all cluster co-lead or co-chair positions at national and sub-national levels, with, for example, WHO reporting that the percentage of health clusters co-led at country level by national Ministries of Health has decreased from 57% in 2017 to 37% in 2020, and only one cluster was co-led by an NNGO.

This uneven process within organisations, across coordination fora and in crisis responses could be described as an increasing ‘institutionalisation of localisation’ as commitments have become increasingly codified and turned into policies. At present, the progress of localisation within much of the internationally run system is still overdependent upon individual ‘champions’ within organisations – meaning, as several diarists noted, progress was thrown into doubt once these individuals moved to other roles. Consequently, greater institutionalisation within organisations and coordination structures could drive the agenda forward and finally shift practice on a wider scale.

While many of these steps are positive, respondents in this study also discussed what they saw as the risks involved in ‘institutionalising’ local humanitarian action. Diarists were concerned that international actors were still trying to exert control over humanitarian action rather than stepping out of the way and that such self-preservation was leading to a tokenistic approach to localisation, against the spirit of the agenda.

As ‘topline commitments’ to localisation are now starting to manifest in organisational policies, some diarists saw a lack of clear organisational strategy as proof that localisation is being ‘diluted’ or co-opted as an agenda to hold onto power and control. Diarists from INGOs discussed policy conversations with colleagues less convinced of the value of localisation, who perceived that strategies have ‘too much focus on localisation while they felt it should be broader’. Intentions to shift to a more decentralised model – a model where greater autonomy is afforded to country offices of international actors – were also included in localisation policies and are still interpreted by many within INGOs as a more ‘localised’ approach, despite this trend undermining many aspects of the agenda and contradicting local actors’ vision for change. Similarly, many INGOs continue to see the nationalisation of their country offices as contributing to localisation, partly because many of the staff working there are nationals of the host

country. This takes no account of potential negative power dynamics and the lack of decision-making powers of national staff in these organisations. Local actors have also clearly articulated the damage of such approaches for their own civil society (Singh, 2021; Multiple authors, 2020).

2.3 Lack of progress on funding to local actors

Despite some progress, overall funding to local actors remains challenging and inadequate both in terms of quantity and quality.⁵ According to the Annual Independent Review of the Grand Bargain, in 2020 only 13 of 53 grant-giving signatories have met or exceeded the 25% funding target and only 4.7% of global humanitarian funds were given to local and national responders (Metcalf-Hough et al., 2021).

2.3.1 The quantity of direct funding to local actors remains a challenge

The lack of direct funding to LNGOs continued to limit localisation efforts during the pandemic. Increasing challenges to accessing direct funding were reported by national and local actors participating in this study. One diarist reported that some internationally led funding mechanisms were paused as international actors left the country or stopped their programming at the onset of the pandemic. In spite of calls from NNGOs to redirect funding to them, no new or additional funding was allocated to support local actors who were able to continue assisting populations in need. Instead, funding mechanisms such as CBPFs restarted once INGOs signalled that they were able to deliver humanitarian programmes again. NNGOs, in the meantime, managed to fundraise domestically and respond in their communities as best they could.

Similarly, in the Tropical Cyclone Harold response in Vanuatu, the Humanitarian Advisory Group (HAG) and Vanuatu Association of NGOs (VANGO) (2020: 13) found that:

The step up in national and local leadership does not appear to have been met with a step up in direct resource allocation. Frustration at the lack of equal access to funding has continued to emerge as local organisations have been overlooked for direct funding. While Covid-19 provided an opportunity to increase funding to local organisations, donor mindset and processes (including ability to absorb more risk) have not changed sufficiently to facilitate this. In fact, national organisations noted they received less funding for Harold than on previous tropical cyclone responses.

More widely in the Pacific region, Australian Red Cross et al. (2020: 8) found that ‘Sixty-six per cent of national and local actors in the Pacific report receiving an increase in funding in the wake of Covid-19, and 61 per cent of national or local actors report new partnerships with other organisations’. The same report, however, concludes that international funding remains difficult for local actors to access.

In Pakistan and Afghanistan, local actors did report some increase in funding, but this only benefitted a small number of larger organisations that were already in well-established partnerships with international

5 By quality funding, we mean funding that is flexible, predictable and multi-year.

actors (Ullah et al., 2021). Even then, most funding was channelled through UN agencies and INGOs, with only an estimated 6% of overall humanitarian funding (\$150 million) in Pakistan and 2.3% (\$ 704 million) in Afghanistan channelled directly, or as directly as possible, to local actors in 2020 (ibid.). Local actors in Pakistan and Afghanistan also highlighted that, where funding increased, the quality of that funding had not improved, therefore disagreeing with surveyed international actors that funding had become more flexible (ibid.). Similar trends were found in Myanmar, where most funding went through international actors – larger local actors already in well-established partnerships were the main beneficiaries of increased funding (63% of direct funding went to three large local actors). In this case, most funding was realigned to Covid-19 rather than being new funding to support increased needs, and the quality of this funding did not improve (HAG and Myanmar Development Network, 2020).

In some contexts, flexibility to repurpose funding to address the impact of Covid-19 restrictions was extended to local actors. For instance, the STAR Ghana Foundation was able to reallocate a significant portion of grant budget underspend from FCDO to a Covid-19 response programme that supported a coordinated civil society response to the pandemic, ensuring the most vulnerable citizens were supported (HPG, n.d.). While such flexibility is welcomed by local actors where it exists, the lack of new funding at a time of increased need was perceived as detrimental to critical existing humanitarian work. According to Konyndyk et al. (2020), NEAR reported that their local and national members were only able to access new Covid-19 funding in two out of 28 countries (Turkey and Syria), adding: ‘in the other 26 countries, NEAR’s members reported repurposing existing funds to support their Covid-19 efforts – forcing them to short-change their other critical humanitarian work’.

At the global level, and despite recognising the unique role of local actors, the Global Humanitarian Response Plan for Covid-19 (GHRP) channelled the majority of funding to UN agencies. According to the Charter for Change (2020), as of May 2020, OCHA’s Financial Tracking System (FTS) showed that only 0.1% of total funding for the Covid-19 response was reaching national and local NGOs. Following criticism of this practice, the GHRP received an additional \$300 million to bolster NGO rapid response to Covid-19 (out of a July 2020 appeal for \$9.5 billion and reported funding in February 2021 of \$3.73 billion (OCHA, 2021)). It was hoped this would help realise Grand Bargain commitments to fund local and national NGOs as directly as possible.

Currently funding continues to go primarily to UN agencies in the hope that they will cascade it to local actors. As Konyndyk et al. (2020) state, rather than accelerating reform, ‘the Covid-19 crisis is instead prompting a regression toward traditional donor and UN funding dynamics’. The rationale for funding UN actors may be reflective of their unique proximity and role in supporting national governments

and the unprecedented use of social protection schemes to respond to Covid-19. This trend is also supported by donors' belief that this is the most rapid way to disburse funds. Yet, Konyndyk et al. (2020) argue this 'does not necessarily translate into timely frontline delivery'.⁶

The GHRP final progress report highlights that 'several efforts were made to increase the timely cascading (and contract/reporting conditions) to actors closer to the front lines of humanitarian need and action' (OCHA, 2021: 9).⁷ However, very little systematic evidence beyond broad policy commitments exists on how funding (both in quantity and quality) cascades to local actors from UN agencies and which types of partnerships accompany this funding flow (see Charter for Change, 2020). The GHRP final progress report estimates that, on average, 11% of UN agencies' Covid-19 funding was passed on to implementing partners without disaggregating between local and international actors. The report only provides figures for the percentage of funding that CBPFs allocated to local actors⁸ (32% or \$80 million out of \$252 million)⁹ and the total Central Emergency Relief Fund (CERF) allocation to NGOs and partners as sub-grants from UN agencies (\$58 million out of a total CERF allocation of \$241 million) (OCHA, 2021:10). According to Metcalfe-Hough et al. (2021), a third of NGOs that received part of the International Organization for Migration (IOM)-managed CERF grant of \$25 million for Covid-19 response were local or national NGOs. The GHRP final progress report notes 'there is a continued need to improve transparency and tracking of the funding – flexible and other – that is cascading through the system and reaching those front-line partners' (OCHA, 2021: 9). The call to better track funding to local actors has long been made by networks such as the Charter for Change and others, with little progress towards this goal (see Els and Carstensen, 2015; Els, 2019).

2.3.2 Some slow progress on quality funding to local actors

There were some positive instances of increased quality in funding to local actors. FCDO updated their Rapid Response Funding guidelines for humanitarian funding, which require NGOs to 'demonstrate how they work with local actors to support the UK in its international commitments to meet 25% of local/national actor funding' (FCDO, 2020: 11).¹⁰ In addition, the updated funding guidelines request that INGOs 'pass on their own [Non-Attributable Project Cost] rate to all local and national downstream partners' (ibid.: 17). This was accompanied by a pilot of harmonised reporting, making it easier for national actors to meet monitoring requirements: FCDO's Humanitarian Assistance and Resilience Programme Facility in Myanmar, for example, reduced documentation requirements and put in place exemption conditions for faster procurement with local and national organisations during the pandemic, although this change is expected to be temporary (HAG and Myanmar Development Network, 2020).

8 More precisely here, local actors refers to national NGOs and the Red Cross/Red Crescent national societies.

10 It is important to note that FCDO has not extended these funding guidelines to the other humanitarian funding it provides and it is unclear whether the Rapid Response Funding mechanism will continue to be used in the future. The FCDO Rapid Response Funding guidelines are, however, presented as an example to inspire and influence change in other funding mechanisms within FCDO.

Box 4 Seed funding for a more local response to Covid-19

Investment in capacity strengthening is happening, albeit in a slow and ad hoc manner. In order to support local partner response capacity, Street Child (through partnership with the Child Protection Area of Responsibility) funded five Covid-19 Rapid Response Funds for local actors. In Cameroon, they seed funded £30,000 to the first two phases of a Rapid Response Fund led by LUKMEF through its Covid-19 appeal fund. The largest partner has developed a £800,000 staged, one-year response plan across health, education, prevention, protection and WASH.

Source: HPG (n.d.)

The 2021 Grand Bargain Review also highlights some positive practice from UNHCR, Catholic Relief Services (CRS) and UNFPA: UNHCR agreed a new policy on partner integrity capacity and support costs in 2019 with a standard 4% overhead costs in all partner budgets; CRS allows 5% budget allocation to costs; and UNFPA in 2020 reported providing an average of 7.2% support costs to local and national organisations in humanitarian settings (Metcalf-Hough et al., 2021: 51).

The Covid-19 response also provided an opportunity to advance the funding conversation in ways advantageous to localisation. NNGOs in South Sudan, for example, were reportedly connected directly to donors – in this case FCDO – for the first time, as a consequence of the gaps left by international actors. In general, flexible funding responses made the most positive impact. Relatively small funds (Box 4), including a dedicated Covid-19 fund from the Start Network, the SAFER fund in the Philippines, Trust Africa's Covid-19 Africa Solidarity Fund and the Livelihoods and Food Security Fund (LIFT) in Myanmar were acknowledged as playing a valuable role, providing special allocations to allow LNGOs to respond to the needs of the pandemic (HPG, n.d.).

2.3.3 No systemic shift in funding to local actors

These positive examples of flexibility remain small in scope and do not alter the underlying dynamics of how the system is currently funded. The Asian Preparedness Partnership stated that the lack of access to tailored and flexible humanitarian funding for local actors remains a challenge, along with a lack of involvement in decision-making and a lack of trust (HPG, n.d.). Donor interviewees reported there was little chance of further shifts towards less restrictive or direct funding. Additionally, there is some scepticism about whether changes made during the pandemic will be sustained. Only if key funders such as USAID, ECHO and FCDO radically change their funding approaches will the overall funding picture for local actors improve.

This has implications for LNGOs. Local NGOs and church groups in the Philippines responding to typhoons in 2020 did so quickly but, as one diarist reported, had 'meagre resources in comparison' to international actors, as resources from usual donors were scarce. LNGO staff working in DRC expressed

frustration at the lack of understanding of the high price of operational costs in such a context, and the continued discrepancy in overhead costs between international and local aid providers. Low levels of unrestricted funding directly affect LNGOs' ability to deliver and to improve their organisations. Indeed, the 2021 Annual Independent Review of the Grand Bargain (Metcalf-Hough et al., 2021: 59) states that:

Including appropriate volumes of core costs in existing and future agreements could be transformative – enabling local partners to invest in staff development, institutional systems or policy engagement – all areas that can empower them as leaders of humanitarian response.

In a global context of tightening funding for humanitarian responses, initial reports from diarists suggested competition would likely increase among aid providers. One example included an INGO dropping an informal agreement not to compete for country-based pooled funding. This fund was understood to be an important means for local actors to access direct funds, but a contraction of the INGOs' usual funding sources meant they now compete with their own former LNGO partners for the same money. As the diarist described, it was frustrating to see that difficult funding contexts meant 'we'd rather infringe in terms of the partners' space'. Many argue that despite rhetorical shifts in favour of localisation, the global recession and increased aid scrutiny will simply make progress more difficult.

Alternative funding sources were also discussed as being a new area of competition. A heightened interest in domestic resource mobilisation from both LNGOs and international actors in emerging economies such as India has been partly blamed for the trend of INGOs 'nationalising' country offices, which has negative consequences for localisation. Many organisations are now turning to corporate and trust funders or individual giving: both sources were described by one diarist as being far less aware of or interested in the need for localisation.

2.4 A changing localisation agenda

The localisation agenda of the Grand Bargain has tended to be understood mainly in terms of funding, that is, whether the target of 25% of humanitarian funding going to local organisations by 2020 would be met. The sector has failed to reach this target. However, at the same time, local organisations and some INGOs have worked to further local humanitarian action, leadership and complementarity outside the Grand Bargain process. Many of these efforts to localise the aid system long predate the WHS, with a broad agenda shaped by a multiplicity of actors and voices, often with different priorities (Mitchell, 2021). Three trends can be observed from this wider process.

First, the focus on the percentage of funding flowing to local actors is slowly being superseded by discussions about equitability and flexibility in funding as well as partnership practices. This may be a consequence of the current low likelihood of a great increase in direct funding to LNGOs, but it also reflects the growing need to address the quality of funding going to local actors, in part due to Grand Bargain discussions on quality funding. An example was highlighted by an LNGO respondent who argued that INGOs had not matched their operational requests with adequate budget and overhead costs, leaving LNGOs 'obliged to adjust again our costs which are going to impact the quality of our work on the field'.

Such a discussion has implications for both donor policies and international organisations acting as intermediaries, and whether partnerships between international and national actors extend donor funding conditions equitably to local actors. This focus on quality, equity and flexibility also reflects the importance of enabling different power dynamics in partnerships. This was highlighted by examples of more positive partnerships mentioned by respondents, including the STRIDE initiative and an INGO based in Lebanon. Both partnerships both began as capacity-strengthening relationships without funding or contracts, which enabled a more trusting and equitable relationship on which to build further collaboration.

Second, there are signs that perceptions of ‘local’ actors are broadening beyond NNGOs to include governments, private sector actors, hyper-local frontline responders and wider civil society actors. Responses to and alongside Covid-19 have demonstrated to many diarists the key role of governments in facilitating or challenging the work of LNGOs. For example, in Uganda, a diarist noted that refugee-led organisations were for the first time granted permits to provide services to displacement camps by UNHCR and national authorities in ‘a short-term change, one they believe will lead to a better position’. In Vanuatu during the Tropical Cyclone Harold response, government regulation ensured any funding provided to international actors must be matched with equal contributions to the national government (HAG and VANGO, 2020). In 2020, the role of governments not only reflected their unique position to respond to Covid-19 but also the role they should play in future disaster response.

Third, there is tension between local organisations of different sizes and what constitutes a truly ‘local’ actor. Diarists from both local and international NGOs in India and Indonesia reflected on their own roles in ‘hyper-local’ responses, and their responsibilities as larger organisations to small-scale, local community organisations. Such an issue is particularly relevant in displacement contexts such as the refugee camps of Bangladesh, where diarists expressed concern around the implications of a lack of Rohingya representation in localisation advocacy. In many contexts, national-level NGOs are now large entities run from country capitals and operate a ‘surge’ model of staffing (similar to many international actors). Diarists raised concerns that finding and supporting first responders in an affected local area could be sidelined by recurring partnerships with these large ‘preferred partner’ NNGOs – a process not helped by access restrictions, weak and unreliable telecommunications, limits on face-to-face gatherings, and tight proposal deadlines from donors. As one INGO staff member said, ‘Covid has driven us toward working with organisations that are based in the country, but not necessarily ones that are truly “local”’.

Similarly, in many countries the localisation agenda is becoming increasingly entangled with wider considerations related to civil society and how governments can limit or facilitate progress. Several diarists described how host governments’ desire to own national responses has driven localisation forward, although the language of the agenda is not necessarily used to do so. Conversely, a diarist working in Sudan, where the civil society space is highly restricted, reported the de-registering of ‘over 50’ local NGOs seen by the authorities as having links to the previous administration, limiting progress on localisation. Diarists also reflected on the ‘overbearing influence’ that many decades of international aid responses have had on civil society in the countries in which they work. This has led to international actors partnering with and strengthening ‘mini-Oxfams’ at the expense of working with

more grassroots, less readily identifiable actors that may have better claims to represent and deliver to affected people. While such conversations are marginal and remain very context-specific, they will likely become more prominent as localisation strategies develop further.

2.5 ‘Losing patience with treading carefully’: creating alternative systems of support and coordination

While some INGOs and donors continue with these incremental steps toward localisation, diarists expressed frustration at the slow pace of change, which was held back by some international actors. One diarist from an international organisation reported they and colleagues were ‘losing patience with treading carefully’ and instead argued for ‘a decisive break with the past’. Global-level processes administered by UN agencies were considered to be approaching localisation in a ‘tokenistic’ manner, with one diarist blaming the lack of progress on a ‘gulf of scale that is too wide’ between global policy reform and local actors.

Rather than waiting for change ‘from above’, some of the key changes reported this year concerned LNGOs and other local responders creating alternative response systems led by national and local organisations. A diarist working in the Philippines described how the response to the typhoon season had reinforced the importance of effective coordination and information-sharing among members of the National Council of Churches in the country, leading them to work ‘with a new focus’ and operate similarly to a network of LNGOs. In Indonesia, the membership of Sekretariat Jaringan-Antar-jaringan (Network of Networks of Civil Society Organisations, abbreviated to SEJAJAR) grew, with the network providing training and support to its LNGO affiliates (Li et al., 2021) (see Box 5).

Box 5 The role of international partnerships and national networks

The work of NNGO Muhammadiyah in Indonesia throughout the Covid-19 pandemic highlights the importance of international organisations’ support and buy-in to the localisation agenda. Building new partnerships with HCT members, SEJAJAR, donors and UN agencies was cited as key for Muhammadiyah in their provision of essential food packages and personal protective equipment (PPE) and dissemination of an education campaign against Covid-19. These partnerships brought in additional funding as well as space for increased advocacy efforts and knowledge-sharing among CSOs. This intervention provided 560,000 food packages, 400,000 facemasks and reached 200,000 people with Covid-19 prevention and preparedness messages.

Source: HPG (n.d.)

Similarly, diarists also reported many of the funding mechanisms successful in reaching LNGOs in the last year seemed to sit outside of the formal international humanitarian system. For instance, the Jordanian National NGO Forum (JONAF) issued a specific Covid-19 emergency response plan offering \$1.4 million to community-based organisations (CBOs), CSOs and some government bodies to maximise the collective geographic reach of their local civil society intervention (HPG, n.d.). Diarists also referred to the growing trend of creating national-level pooled funds mechanisms that are led and managed by national and local actors, the SAFER fund in the Philippines being one such example (SAFER, 2021). Other examples include the initiative between Denmark, Save the Children and NEAR to establish locally managed pooled funds in Somalia and West Africa, or the Oxfam pre-financing rapid response facility (Metcalfe-Hough et al., 2021: 55).

A similar pattern can be observed in discussions of capacity. During the pandemic, there were common perceptions among donors and international actors that LNGOs lacked capacities, meaning that localisation necessarily entailed a compromise of programme quality.¹¹ Narrow understandings mean ‘anyone who doesn’t fit [that model] is considered lacking capacity’. This impacted responses, for example, in Myanmar, where ‘the role of first line responders in conflict-affected areas’ was seen as crucial, but ‘it could have been so much better and stronger’ if ‘small LNGOs were able to have access to direct funding or fewer due diligence processes’. The conversation on capacity is also currently, as repeatedly argued by many localisation advocates, a one-way process. Key capacity gaps in INGOs identified by diarists included a lack of coordination among UN agencies over due diligence requirements, a lack of contextual understanding as to who the parties ‘delivering the majority of assistance actually are’, and the inability to contract multiple small organisations. In contrast, as one humanitarian argued: ‘the national organisations that grow and flourish make their own commitments to building their capacity, they learn, borrow and engage with the international sector, but they do not sit and wait for their capacity to be built’. Capacity exchange initiatives among peer LNGOs was reported in contexts as diverse as Libya, India – with the founding of a national practitioner hub – and Nigeria, where training workshops on reintegrating children post-conflict that were formerly led by a UN agency are now supported by a network of local NGOs that decided to pool their resources. Networks such as NEAR also play a valuable role in supporting peer exchanges and collaboration, as well as developing a performance management framework with a necessarily broad view of what localisation should encompass.

While currently small in scale and disparate, such examples provide a growing sense of momentum and desire for an alternative means of collaboration in crises rather than waiting for change ‘from above’. Despite continued barriers to the direct funding that would accelerate change, these various funding and support initiatives already constitute an often overlooked alternative humanitarian system. There was a real interest in these approaches and their possibilities for driving further change, including from

11 In a recent interview, the new European Commissioner for Crisis Management proposed the ‘capacity of local actors’ as ‘actually the biggest barrier to localisation’ (Alexander, 2021).

INGO representatives who recognised their power to break old monopolies and ways of working. As one diarist explained, ‘if all of a sudden there are models that do not depend on my gatekeeper role and the funds start bypassing me, then it would force change’.

2.6 Did Covid-19 impact localisation?

Although the spread of and response to Covid-19 constituted a shock to humanitarian practice, diarists were split on whether the changes they described over the study period could be attributed to the pandemic. Many were clear that it forced the international system and host governments to better recognise the unique role of local actors. For instance, there were initially disruptions to international actors’ (such as INGOs and UN agencies) ways of working, which necessitated supporting local responses remotely. As one diarist in Bangladesh reported: ‘typically you had advisors flying from everywhere [for an emergency response]. We had distant support – but the entire response was done from local staff’. According to Australian Red Cross et al. (2020: 3), Covid-19 has led to new spaces for local leadership and shifted traditional ways of working in the Pacific region – mainly as a result of the absence of international staff. This has changed the dynamics of decision-making and leadership. Similarly, 77% of the examples presented through HPG’s mapping tool identified a change since the beginning of the pandemic (see Box 6).

Box 6 Summary of findings from the Covid-19 and local humanitarian action mapping tool

With 77% of examples highlighting a change since the beginning of the pandemic, the mapping tool data suggests that Covid-19 has provided opportunities for local humanitarian action. Several trends can be identified.

HPG's Covid-19 and local humanitarian action mapping tool found that local actors were taking a lead role in communication and community engagement in the Covid-19 response. In Afghanistan, the NNGO COAR broadcasts up-to-date information regarding Covid-19 for the community and also distributed 10,000 Ministry of Public Health and WHO message-approved brochures to targeted provinces in the country. In Hargeisa, a call centre organised by local NGO Shaqodoon, in collaboration with the Ministry of Health in Somaliland and Oxfam, shares information related to Covid-19 and how the community can protect themselves – by May 2020 they had received more than 600,000 calls combatting misinformation among citizens.

In addition, data collected through the mapping tool highlights the importance of local actors in supplying essential items such as food and shelter to affected populations. For example, Humanitarian Aid International in India has responded to multiple needs across the country as a result of flooding and the pandemic, specifically providing households in Delhi and Assam with food parcels, shelter and hygiene kits. Local actors have also been responsible for procuring and distributing PPE for frontline workers and the wider population. In Kenya, through Equity Group, the local private sector mobilised to redirect production lines to manufacture PPE locally, using the bank's branch infrastructure to coordinate the distribution of PPE to healthcare workers across the country.

Existing partnerships and networks were commonly cited as enabling local actors to continue their programming throughout the Covid-19 pandemic. JONAF issued a Covid-19 Emergency Response Plan, which allocated \$1.4 billion to CBOs and CSOs within its network to maximise the collective geographic reach of assistance. Funding raised from international, local and private sector sources was often reported as a significant factor in local actors' ability to respond to the changing environment throughout the pandemic.

Access to funding remains a challenge for local actors, especially longer-term, quality funding. The EHSAR Foundation in Pakistan has provided 600 PPE kits to frontline health workers and financed three ambulances to transport patients, as well as 900 safety kits, 100 dignity kits and 6,000 masks for affected populations. However, they have called for greater and longer-term funding from international sources to continue their operations throughout the pandemic. Other examples highlight the frustration and remaining challenges related to a lack of recognition of local actors' work in humanitarian response and how coordination and decision-making platforms have yet to facilitate greater inclusion for non-international organisations.

Alongside the pandemic, diarists reported impressive responses by LNGOs to other concurrent (non-Covid-19) crises, including typhoons in the Philippines, Ethiopian refugees arriving in Sudan, fires in the Rohingya refugee camps in Bangladesh and flash flooding in India, highlighting their expertise and ability to quickly mobilise volunteers. In some cases, the pandemic ‘opened more doors’ for LNGOs as they took on responsibilities and roles vacated by international counterparts. In Uganda for example, LNGOs led successfully on subnational hazard risk and vulnerability assessments in a process that will continue beyond the pandemic. Covid-19 restriction measures meant the Tropical Cyclone Harold response in Vanuatu became a case of ‘forced localisation’, whereby local NGOs and existing social networks mobilised to raise funds and collect relief items and a local foundation facilitated training for affected people to weave downed coconut trees into shelter (HPG, n.d.; see also HAG and VANGO, 2020 and Box 7). These interventions were supported by the Vanuatu Business Resilience Council, a Connecting Business Initiative network, which activated its own preparedness measures to reconnect the islands following the cyclone and assisted in supplying more than 1,000 coastal households with 35 tons of food and non-food items (HPG, n.d.).

Whether these examples led to increased recognition of the capacities of LNGOs among INGOs and donors is ambiguous. While the response of some was to decentre and go local, others shored up their remote management approaches. As one diarist noted, ‘the new “words” are more remote monitoring, management and adaptive programming ... the link between Covid and localisation is not at the forefront of what we discuss’. For many, adapting to Covid-19 appeared to mean more reliance on digital tools and remote management rather than giving greater recognition to LNGO partners. For those LNGOs that continued to deliver, any acknowledgement from the international system that they had a ‘unique position’ as first responders (see OCHA, 2020a) came with an increased reporting burden to supply information to internationally run coordination systems. As well as not always being provided with the necessary extra resources to carry out this additional work, this division of responsibilities further entrenched existing power dynamics in a manner unhelpful to localisation goals.

In 2020, Covid-19 was just one of many factors that impacted progress on localisation. For some diarists a more important driver for change has been the increasing prominence of the ‘decolonising aid’ agenda, which gained renewed momentum across much of the sector in the wake of the BLM movement. Just as BLM supporters drove conversations around systemic racism across wider society, advocates in the aid industry highlighted the legacies of colonialism and current racist practices present across the humanitarian sector (see *The New Humanitarian*, 2020; *Peace Direct*, 2021). For many INGOs, this was a political and ethical trigger for an urgent rethink of current practices and relationships with local partners. As one diarist noted: ‘BLM has been one of the most powerful forces’ in their organisation; while some leaders ‘do not accept the critique of aid as structurally racist or colonial’, the decolonising aid movement has triggered deeper reflection from their technical advisor staff on local expertise, local knowledge and the need to reframe the relationship between headquarters, country offices and the local and national organisations they partner with.

Box 7 Responding to disasters in the midst of the pandemic: the case of Tropical Cyclone Harold in Vanuatu

The category-five Tropical Cyclone Harold hit Fiji, the Solomon Islands, Tonga and Vanuatu in April 2020 in the midst of the global Covid-19 pandemic. As Bamforth et al. (2020: 7) state, ‘the context of the Covid-19 pandemic challenged traditional modus operandi in humanitarian response in the region’. Covid-19-related restrictions meant that international presence and international surge was greatly reduced, providing space for local and national actors, including government, to take on the leadership of the response (HAG and VANGO, 2020; Bamforth et al., 2020). Indeed, many governments in the Pacific islands required international aid workers to leave, forcing them to pivot to remote support (Australian Red Cross et al., 2020).

In Vanuatu, which had previously relied on a mix of international and local actors to respond to such disasters, multiple Covid-19-related constraints, such as travel restrictions and quarantine of relief items and people, meant that a different response was needed. By necessity, this became a nationally led response (HAG and VANGO, 2020). With less international surge, the national government of Vanuatu felt better able to coordinate the response, therefore highlighting the detrimental impact of international surge on national capacities (ibid.). Similarly, the response in Fiji was also deemed to be locally led in the absence of international actors in country. According to Bamforth et al. (2020), this resulted from years of investment in long-term partnerships, capacity strengthening and preparedness.

HAG and VANGO (2020) found that the nationally led response to Tropical Cyclone Harold in Vanuatu was more inclusive of communities, more participatory and more relevant, with strong alignment between needs and response. However, remote and isolated communities were not adequately included and their specific needs not addressed. The response was not perceived to be timely. It remains unclear whether this was the result of it being nationally led and mainly done through local action or the impact of Covid-19 restrictions on logistics.

Despite the response in Vanuatu being locally led, direct funding to national actors was not observed and many national organisations highlighted a reduction in available funding compared to responses in the past (HAG and VANGO, 2020). The majority of funding was passed from international actors to local actors as part of partnerships that were considered unequal. There was also little monitoring or reporting to donors on the quality of these partnerships (HAG and VANGO, 2020).

Red Cross National Societies had a better funding experience. Enabled by IFRC's Disaster Response Emergency Fund (DREF), which was allocated to national societies in Fiji and Vanuatu before Tropical Cyclone Harold hit, the Fiji and the Vanuatu Red Cross National Societies felt more able to exercise their leadership in the absence of international actors. In addition, the Fiji Red Cross National Society was able to raise funds domestically (Bamforth et al., 2020). Remote support in terms of technical support, logistics and funding were key in enabling these actors to address the scale of the disaster. However, overall leadership did not completely shift certain dynamics as 'international partners retained a high level of control over finance and logistics' (ibid.: 6). As such, international donor funding remained challenging for local actors to access.

While there were regional variations in how often the decolonising aid movement was raised as a driver of change, with a greater frequency in Anglophone donor and INGO capitals, it appeared to be a powerful factor across many INGOs. For one INGO staff member, discussions with external decolonising aid advocates was 'one of the most powerful moments in my 17 plus years' at the organisation and 'contributed to a recent sense that the ground is definitely shifting'. Whether the impacts of the pandemic or the BLM movement are momentary or enduring factors for change is not yet clear.

Finally, many of the changes documented through the diary entries reflected longer-term initiatives and advocacy that started as part of the Grand Bargain's localisation commitments. Taking stock of the last five years, the 2021 Annual Independent Review of the Grand Bargain highlighted that localisation is one of the commitments 'where the Grand Bargain can be seen to have driven, or at least significantly contributed to, a system-wide shift in policy and – to a lesser though still important extent – in practice' (Metcalfe-Hough et al., 2021). The diary entries provided further insights into why this was the case. While the Grand Bargain has facilitated internal reform discussions within INGOs, internal advocacy and the journey towards institutionalising commitments is proving to be long and challenging.

Without the foundation laid down by the advocacy around the WHS and its continuation as part of the Grand Bargain, it is unclear whether Covid-19 or BLM would have specifically triggered more local humanitarian leadership. For example, BLM resulted in more discussions in donor and INGO capitals where internal advocacy within these organisations was already ongoing since the Grand Bargain process. Covid-19 is likely to have triggered change in some regions where concurrent and overlapping new disasters occurred. In these cases, the pandemic – rather than policy or long-lasting change in the system – has provided space to showcase more locally led responses. BLM, on the other hand, seems to have highlighted the risk associated with not supporting change towards a more local humanitarian system in ways that could be longer-lasting and systemic.

2.7 Conclusion

While Covid-19 restrictions may not have presented an existential threat to the international humanitarian sector, the combination of its effects with the decolonising aid movement and additional factors, such as cuts to the FCDO humanitarian aid budget and assertive host government policies,

made one respondent 'feel like the wall is coming down' on business as usual in the sector. Others reflected on how these elements make it 'increasingly impossible for us to continue as is', and that the 'question is becoming less whether we will evolve, and more how deliberate and constructive that change process will be'.

Perceptions of the incentives around localisation may have also shifted due to the pandemic and/or a combination of these factors. A growing sense was evident of there now being reputational risks of *not* changing practices. This was compounded by high-profile news coverage of a 'reckoning' for the sector (New York Times, 2021). Some respondents also proposed these incentives have led to INGOs having to localise out of necessity, as one of several reform processes, for reasons of self-preservation. This would explain the inconsistent approaches observed in this study, such as a drive towards a decentralised model of working alongside localisation commitments.

However, a lack of systemic change in the key areas of funding, and persevering attitudes to and perceptions of risks and local capacities, as well as reluctance to open up coordination spaces, highlight that the positive changes described in the previous section are still happening largely within the confines of an international and donor-led system that undermines local humanitarian action. Though Covid-19 has brought a realisation among many humanitarians that the status quo was not as permanent as previously thought, there are still fundamental areas preventing change. Self-interest in preserving privileged positions is also an issue for many actors. As one diarist remarked: 'no-one is climbing out of their ivory tower to make room for others, although some are being pushed.'

The role of donors still dominates much of the conversation around localisation and this continued during the Covid-19 response. For many, 'there is still a profound belief that it is donor compliance preventing change'. Key barriers for INGOs seeking to shift to a more localised model are short-term funding arrangements and a lack of direct relationships with contractors outside of project cycles. Donor funding still has high compliance requirements, sometimes regardless of grant size, which small LNGOs often cannot meet. This lack of flexibility has also been evident during the pandemic: multiple diarists reported donors not allowing response-related reallocations. Above all, despite many donors expressing a desire to support localisation, such goals have not been backed up with sufficient incentives for those they fund to do so. Neither are there currently sufficient mechanisms by which to appraise staff or hold them accountable for progress: according to one INGO respondent, donors are not 'holding our feet to the fire'.

3 Implications for moving towards more local humanitarian action, local leadership and complementarity

We set out to document whether Covid-19, in disrupting the humanitarian system, provided an opportunity for local humanitarian action, local leadership and complementarity. Far from being a given, this study wanted to understand where change was and was not happening and why. We found that change is taking place, but slowly. First, this slow pace reflects how long it takes for global policy commitments to be endorsed by key actors (large INGOs, UN agencies and donors), before being translated into organisational-level policies, strategies and plans, and then implemented at scale from headquarters to country level. After five years of the Grand Bargain, this last stage has not yet been reached.

Second, the slow pace of change reflects that localisation is happening in spite of fundamental obstacles in the system. While international actors are increasingly endorsing localisation as the way forward, they continue to question the capacity of local actors to manage funds adequately, to operate at scale and to uphold humanitarian principles. As a result, there are limited efforts to trial new approaches at scale, take calculated risks and set in motion new funding approaches. More significantly, some international actors endorse a localisation that allows their self-preservation either as the intermediary, the expert, the leader or the judge. Substantial obstacles to localisation have yet to be addressed, including the lack of quantity and quality funding for local actors, and international actors' perceptions of local actors' capacity and the risks related to localisation, as well as their drive towards preservation of the status quo. All of this has implications for what is next for the humanitarian sector and local actors' role in future humanitarian response.

3.1 A more ambitious and accountable reform process

The change of narrative and the push towards integrating localisation within organisations' policies and strategies are great opportunities to revisit, clarify and adopt a more ambitious agenda on local leadership and complementarity. However, few international organisations have clearly articulated what localisation means for them and the changes they are committing to in order to shift practices that continue to negatively impact on local action, leadership and complementarity. Instead, despite claims to the contrary, international actors too often fail to integrate global commitments to localisation into change management processes within their organisations.

Importantly, processes to articulate a vision of change should be done in close collaboration with local and national actors. A peer review process where local and national actors can comment on

internationals' vision, organisational commitment and localisation strategy would prevent international actors from adopting self-preserving interpretations of localisation and increase their ambition beyond the Grand Bargain commitments.¹²

Some diarists felt there was real value in reiterating the need for complementarity approaches.¹³ However, prevailing attitudes towards local capacities (including narrow understandings of capacity and negative perceptions of local capacities) continue to prevent complementarity. Complementarity requires both international and local actors to critically reflect on their roles and added value in humanitarian responses. Rather than seeing local capacity as a last resort, international actors should set out to complement local response ecosystems and actors.

Past research has highlighted that complementarity between international and local actors does happen; innovative approaches to enable local humanitarian action can emerge when international actors have no choice but to rely on local actors (Barbelet, 2019). This has most often been the case when international actors have no access to people in crisis, either due to national government restrictions or the security environment. Similarly in 2020, travel restrictions linked to the Covid-19 pandemic (and, to a lesser extent, the reputational necessity of addressing racist and colonial critiques of the humanitarian sector through more equal and equitable partnerships) have meant that localisation is seen as more of a necessity. Nevertheless, this has not been enough to motivate reform in the sector, as seen by the mixed reports of change in the last year. As HAG and Myanmar Development Network (2020: 35) conclude in their report on the impact of Covid-19 on localisation in Myanmar:

Covid-19 has certainly pushed the localisation agenda forward in Myanmar – although not to the level that was possible given the opportunity. It has also been dragged back in some areas due to international partners defaulting under pressure. However, overall, there has been a net gain for localisation, and the momentum generated may be sufficient to drive the humanitarian sector in Myanmar towards a more locally led approach. Whether and how it continues to gather momentum will depend on the role each of the humanitarian actors decides to play.

3.2 Parallel systems

Local humanitarian action, local leadership and local crisis response systems have existed for years. In fact, most of the examples we found when tracking local humanitarian action and complementary partnerships were examples of local humanitarian action detached from the international system, or at least not explicitly linked to international funding (HPG, n.d.; see Box 8).

12 The authors recognise that the Charter for Change is a similar process and a more ambitious commitment to localisation than the Grand Bargain with reporting requirements.

13 Complementarity is defined as 'an outcome where all capacities at all levels – local, national, regional, international – are harnessed and combined in a way that supports the best humanitarian outcomes for affected populations' (Barbelet, 2019).

Box 8 Local humanitarian action independent of the international humanitarian system

The National NGO Development Project Service Center in Nepal has adapted its normal programme to support pandemic response. They have assisted with food distribution to vulnerable populations in coordination with local authorities, creating awareness at the local level about social distancing and sanitation, and supported the community in dispatching masks, medicines and other necessary items throughout the pandemic.

Santé & Développement (SAD) in the DRC has distributed 12,000 masks to vulnerable people, provided eight health centres and 30 schools with protection kits for staff on the frontline and led a Covid-19 awareness and education campaign. This included training local journalists to increase awareness against the spread of the virus and a Covid-19 brigade who broadcasted community risk awareness messaging and barrier measures from megaphones. This work was enabled by SAD's ability to raise funds locally.

In South Sudan, #COVID-19 RSS is a grassroots community of people who are committed to promoting awareness of the virus and preventing the spread of misinformation related to Covid-19. Fact-checkers were able to convert an existing digital platform to focus on the information challenges related to the pandemic.

Hybrid and parallel response systems that provide space for local action and leadership to grow could provide opportunities to disrupt the humanitarian system from the outside. As has been claimed before (Fast and Bennett, 2020), change tends to come from outside the system rather than from its fraught reform processes. There is a risk that, in some countries, humanitarian response will become even more uncoordinated, with parallel systems competing with each other rather than working in complementarity. This may, however, be the deconstruction necessary to force change and establish local response systems at the centre of humanitarian responses.

3.3 The importance of donor leadership and incentives

Donors are not leading change on this agenda and are instead being led and pushed by NNGOS, national activists and some INGOs. This is disappointing as donors have a major role to play in creating accountability for global commitments; collectively, they can and should exert real change in the system, but have yet to demonstrate commitment to do so (see Barbelet et al., 2021). As outlined above, donors should clearly articulate what localisation means for them and how they are willing to shift their practice. Donors may feel that, individually, they lack the power to incentivise change in the humanitarian system, but collectively donors can support reform in both policy and practice.

This report highlights that national actors are held back by difficulties related to funding and partnership approaches, as well as lack of investment in organisational strengthening. Donors could revise their partnerships frameworks with INGOs and UN agencies to reflect a stronger stance on such practices, including clear monitoring and evaluation of equitable partnership practices. Importantly, UN agencies continue to be somewhat absent from localisation efforts apart from isolated examples. Donors could collectively push for UN agencies to be much more transparent on how funding flows through them to local and national actors, the quality of that funding and the quality of their partnerships. Donors could also request third-party monitoring of UN agencies' partnership practices.

Attitudes to and perceptions of risks, including those of donors and international intermediaries partnering with local actors, remain major obstacles to change. While donors' risk appetites will not change in the near future, clear discussions and outlining of roles and responsibilities for more effective risk-sharing is needed to enable a different way of managing risk between donors, international intermediaries and local actors. An open discussion on the residual risk donors are ready to accept is necessary not only to support more local humanitarian action but generally in the sector. However, the crux of the issue remains in the translation of that risk appetite and the enduring perceptions of local humanitarian action being riskier. These currently translate into multiple, diverse and time-consuming due diligence and compliance processes that could be simplified to enable more local humanitarian action. The issue of risk and the link between quality funding, risk management and localisation are raised in the 2021 Annual Independent Review of the Grand Bargain as crucial conversations to continue in the Grand Bargain 2.0 (Metcalfe-Hough et al., 2021).

The localisation agenda has predominantly focused on advocating for the humanitarian sector to reform itself to enable a more local humanitarian system. At present, the agenda and discussions are changing to embrace much more contextualised, longer-term issues. The future of policy and practice work on localisation must take account of the emerging discussions on civil society development, participation and rights in order to expand beyond narrow, internationally driven agendas to encompass those that matter at national levels. This includes efforts to support national organisations representing socially excluded or marginalised groups, as well as accounting for the dynamics between different national and local actors.

This in essence requires international actors to recognise, enable, reinforce and position local capacities as good in themselves, beyond humanitarian objectives. As donors increasingly work across the humanitarian–development–peace nexus, their approach to local actors, local leadership and local systems should incorporate not just a vision for what local *humanitarian* action looks like but also the value of not undermining local actors for peace and development outcomes.

4 Recommendations

The recommendations below are not new. Instead, they build on existing literature, evidence and studies from the last five years (see Barbelet et al., 2021). Documenting change over the last year through the diary approach highlighted that the same obstacles continue to hamper progress towards local humanitarian action, whether these are attitudes to perceived risks, perceptions of local capacity and reluctance to adequately approach capacity-sharing, or the continued lack of quantity and quality funding flowing to local actors. Individual drivers such as global commitments to the Grand Bargain, Covid-19 making localisation a necessity, and the renewed call in the sector for anti-racism and decolonisation have on their own supported some reform, but not the radical shift required to realise a more local aid model. The evidence that a more locally led aid response model will lead to more effective and quality humanitarian action is anecdotal and often based on perception, but all points in the same direction – that localisation is an opportunity to improve humanitarian outcomes (see Barbelet et al., 2021). Below are key actions that different actors can take to contribute to accelerating the reforms and change needed for a more locally led aid response model.

4.1 To donors

- **Develop a clear and ambitious localisation strategy** outlining the changes in donor policy and practice required to support change, including establishing incentives to support reform among international actors you fund, particularly UN agencies.
- **Hold the international actors you fund accountable** by tracking, monitoring and evaluating the cascading of quality funding (i.e. equal distribution of overhead costs and adequate coverage of risk management, including security provisions), the quality and equity of their partnership practices, and commitments to capacity-sharing that are coordinated and informed by local actors' priorities and added value. Ensure these factors are reflected in donor policies and strategies.
- **Hold yourself accountable** through convening and creating space for direct dialogue between donors and the local actors that you indirectly fund.
- **Develop a risk-sharing agenda across donors** and harmonise due diligence, compliance and audit requirements. This requires engaging in an honest dialogue at senior political levels and clarifying acceptable levels of residual risk.

4.2 To UN agencies and INGOs

- **Be accountable to the commitments you have made** on localisation by establishing transparent mechanisms to track funding flows (quantity and quality) to local actors. In addition, systematically evaluate the quality of your partnerships, including through partnership audits and reviews focused on the experience of local actors.
- **Localise coordination** through adapting it to context and existing structures. This can be done by analysing existing local coordination systems to inform international coordination deployment if needed, as well as locating coordination closer to affected people and decentralising decision-making.

- **Redefine your role and identify your added value** in supporting existing local capacity, action and leadership in humanitarian responses in order to reinforce and not replace or undermine existing local response mechanisms and resilience. This will also ensure complementarity.
- **Recentre your objective on what is best for people affected by crises** and not what is best for the survival of your organisation.

4.3 To the Grand Bargain process

- **Propose an ambitious agenda on localisation based on creating the right incentives for reform and change at the global level**, as well as implementing the myriad recommendations that already exist. Focus on the role of donors in setting these incentives and the role of UN agencies in shifting their practice – they hold the majority of power over funding decisions.
- **Be driven by local actors' voices, experience and realities**, including through expanding efforts at the national level to hold dialogues and support nationally driven localisation strategies.

4.4 To those who want to support locally led approaches

- **Support local action and activism outside of the formal system**, in particular locally led and managed pooled funds, networks of local actors and coordination of local actors, through direct funding, visibility and extending your platform and influence in solidarity.
- **Continue reshaping and redefining the conversation on locally led humanitarian responses outside of the formal Grand Bargain process** to influence global policy discussions for a more ambitious reform agenda in the humanitarian sector.

4.5 To well-established large national organisations

- **Critically assess your own power and the power dynamics in your countries to ensure a diversity of local actors can play their role in humanitarian responses**, in particular smaller and very localised organisations and those representing people who are often socially excluded, such as those representing women's rights, people with disabilities, older people, people of diverse sexual orientation, gender identity and expression and sex characteristics, as well as refugee-led organisations.

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