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Views from the Ground: Perspectives on Localization in the Horn of Africa

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Executive Summary

As the slogan “as local as possible, as international as necessary” reverberates through the humanitarian community, this study seeks to understand the nuances of localization processes in three countries in the Horn of Africa—Kenya, Somalia/Somaliland, and South Sudan. We begin by identifying four assumptions that dominate the discourse on localization of humanitarian aid, which state that local actors 1) are less principled in their response; 2) have less operational and organizational capacity; 3) provide a lower-quality response; and 4) have a lower cost than responses implemented by international organizations. We seek evidence to support or refute these assumptions, while also attempting to identify the factors that enable local actors in providing a high-quality, principled, and effective response, and the ones that hinder them in doing so.

At the heart of this inquiry are the voices—expressing their perceptions and experiences—of staff working for local non-governmental organizations (LNGOs) in these three countries. We purposively chose to focus on this population, because they are often sidelined from the international discourse on localization. In total, 52 qualitative interviews were conducted during the first quarter of 2019. More than half of the interviews focused on staff of LNGOs and local governmental authorities, and the remainder targeted staff of the United Nations (UN), international NGOs, and international networks. From these findings, we provide a set of recommendations that are rooted in the perceptions of local actors.

An overview of the factors identified by local actors that enable and hinder a timely, appropriate, high-quality, and principled response are presented below and elaborated on in the body of the report.

Factors identified by LNGOs that **enable** a timely, appropriate, quality, principled response:

- Proximity to conflict-affected communities:
 - Shared language and local contextual knowledge;

This study seeks to understand the nuances of localization processes in three countries in the Horn of Africa—Kenya, Somalia/Somaliland, and South Sudan.

- Physical closeness;
- Social connectedness and trust;
- Long-term presence;
- Relationships and collaboration with local stakeholders, governmental authorities, and gatekeepers;
- Ability to negotiate access.
- Organizational capacities:
 - Qualified staff and ability to retain them;
 - Access to physical assets to support organization;
 - Fundraising skills and relationships with potential governmental and non-governmental donors;
 - Technical skills for operations;
 - Systemic strengths (management; procurement; risk management; monitoring, evaluation, accountability, and learning (MEAL); human resources (HR);
 - Strong leadership and strategic planning skills;
 - Strong coordination.
- Staff from affected communities;
- Relationships across ethnic groups and/or clans and expansive geographic coverage;
- Participatory needs assessments with affected communities as well as local actors;
- Strong downward accountability mechanisms.

Factors identified by LNGOs that **hinder** a timely, appropriate, quality, principled response:

- Lack of direct funding available to LNGOs;

- Inflexible or short-term funding;
- Lack of direct access to and relationships with donors;
- Lack of access to capacity-strengthening activities;
- Capacity strengthening ill-matched to organizational needs;
- Capacity strengthening focused on upward accountability to donors;
- Lack of a graduation process as LNGO capacity is strengthened;
- Direct competition with international non-governmental organizations (INGOs) for funding;
- Direct competition with INGOs for implementation;
- Lack of dedicated staff and systems for fundraising;
- Lack of core funds;
- Pre-designed assistance and/or donor priorities that conflict with predominant needs;
- Inability to program across sectors or to design holistic programs;
- Lack of trust between international and local organizations;
- Rigid risk mitigation plans, narrow definitions of risk, or shifting burden of risk to LNGOs;
- Lack of funding for advanced MEAL systems.

While local organizations tend to excel in their capacity to be proximate to conflict-affected communities, the full range of organizational capacities are often lacking. Weaknesses in organizational capacity are both a cause and consequence of several factors, including: an inability to access consistent or longer-term funding; an absence of core funds; and few meaningful opportunities for capacity building. Each of these factors impacts an organization's capacity for longevity and sustainability.

Alternative funding mechanisms have been spearheaded in the region, including United Nations Office for the Coordination of Humanitarian Affairs (OCHA) Pooled Funds in Somalia and South Sudan. These funds have provided direct support to local organizations at impressive rates (45% and 39% respectively) that are much higher than the country-wide average of combined humanitarian

funds and the 25% committed by donors under the Grand Bargain. At the same time, this study has also demonstrated that direct funding to LNGOs is only one part of meaningful localization processes. Significant systemic and attitudinal blockages remain within different levels of the international humanitarian architecture.

The following recommendations arise from this study's findings, which are based primarily on the perceptions and experiences of LNGO staff and are complemented with views from members of international organizations and existing literature.

For donors:

- Ensure that partnership agreements support the capacity of local and national actors;
- Consider a type of "affirmative action" for LNGOs over INGOs when competing for the same grants;
- Increase access to unrestricted funds for LNGOs. Consider a minimum percentage for overhead costs;
- Require that INGOs and LNGOs share unrestricted funds in a way that is equal;
- Establish funds that support only LNGOs;
- Engage with LNGO networks and forge relationships with individual LNGOs;
- Consider increasing flexibility in funding and lengthening funding cycles;
- Consider costs as a central tenet for grants awards;
- Prioritize emergency preparedness activities for LNGOs;
- Push the global discussion on risk and increase comfort with risk taking;
- Develop country-based pooled funds accessible for local and national actors that include capacity-strengthening elements;
- Consider supporting the creation of national localization plans;
- Allow funding for programs that work across sectors and holistically;
- Consider lessons learned from the localization of development responses in Kenya and seek to integrate these into humanitarian systems.

For international organizations (UN and INGOs):

- Endorse the principle “if local responders can do it, we don’t need to” and reaffirm commitment to work with LNGOs in a complementary way;
- Measure success beyond financial and portfolio targets;
- Allow local responders to be grant holders and to contract INGOs for technical expertise;
- Invest in building trusting relationships with LNGOs. Highlight LNGO partner work with donors and other stakeholders;
- Address risk with partners, and support their risk mitigation systems and contingency plans. Do not shift risk to partners;
- Increase access to funding for more advanced forms of MEAL in inaccessible areas in order to strengthen INGO-LNGO trust;
- Increase access to unrestricted funds for LNGOs and share unrestricted funds in a way that is equal;
- Establish funding mechanisms only accessible to LNGOs;
- Support capacity building of LNGOs that is tailored, and focused on both upward and downward accountability mechanisms;
- Consider capacity-strengthening activities that allow LNGOs to “graduate” and facilitate direct connections to donors;
- Allow LNGOs to design their own programs and projects based on need. Be aware of steering partners toward donor priorities;
- *Specifically for the UN:* Consider favoring LNGOs over INGOs when they are competing for the same grants.

For LNGOs:

- Engage in networks that can facilitate advocacy and donor engagement;
- Include funds for institutional capacity strengthening as a standard in all projects;
- Engage in clusters and other coordination mechanisms;
- Engage in project development when partnering with INGOs;
- Bring international partners into a discussion on risk and difficulties faced in providing a principled response.

A. Introduction: motivation

"As local as possible, as international as necessary" has become the slogan of one of the latest trends in humanitarianism—localization. A localized humanitarian response has several assumed or presumed benefits over those spearheaded by international agencies. Giving preference to the local or national organization has provoked concern among international organizations over quality and competition, while at the same time challenging donors on the adaptability of funding mechanisms and risk management practices. Little empirical research has been conducted on the most effective forms of localization, and even fewer studies have narrowed in on the experiences of local organizations.¹ The Horn of Africa, particularly Kenya, Somalia/Somaliland, and South Sudan, provides a set of contrasting case studies from which to learn, as this is a region where emergencies and longer-term development concerns are both continuous and evolving.

While there are no internationally agreed-upon definitions of "localization" and "locally led humanitarian action (LHA),"² there are several commonalities that cut across multiple interpretations. One frequently employed definition describes aid localization as "a collective process by the different stakeholders of the humanitarian system (donors, UN agencies, NGOs) that aims to return local actors (local authorities or civil society) to the center of the humanitarian system with a greater more central role."³ Another describes localization as "umbrella term referring to all

approaches to working with local actors, and 'locally led' to refer specifically to work that originates with local actors, or is designed to support locally emerging initiatives."⁴

The localization agenda has been gaining momentum since the World Humanitarian Summit of 2016 and subsequent institutional commitments to the Grand Bargain. The Grand Bargain focuses on a general commitment to support the institutional capacities of local and national responders, including an intention to reduce barriers to effective partnerships. There are also commitments to increase funding "as directly as possible" to national and local responders, with a target of 25% by 2020.⁵ At the same time, a parallel momentum has arisen in line with the development of the Core Humanitarian Standard (CHS) and its Nine Commitments, aimed at improving the quality and effectiveness of assistance. The commitments focus on a range of topics from appropriateness and timeliness of aid, to requiring organizations to manage resources effectively, efficiently, and ethically.⁶ How these two agendas may be complementary or working against each other has yet to be fully explored or understood. As such, we explore this link by specifying research questions that are grounded in CHS and motivated by the principles underpinning the Grand Bargain.

The literature is replete with assumptions about the benefits and drawbacks of a localized response. Most reports are based on anecdotal evidence,

1 Imogen Wall and Kerren Hedlund, "Localisation and Locally-Led Crisis Response: A Literature Review" (L2GP, May 2016); Eva Svoboda, Veronique Barbelet, and Irina Mosel, "Holding the Keys: Humanitarian Access and Local Organisations," Report (Humanitarian Policy Group at ODI, January 2018).

2 Note this paper will use the terms "localization" and "locally led humanitarian action" interchangeably.

3 Véronique de Geoffroy, François Grunewald, and Réiseal Ní Chéilleachair, "More than Money-- Localisation in Practice" (URD and Trocaire, 2018), 1.

4 Wall and Hedlund, "Localisation and Locally-Led Crisis Response," 4.

5 See <https://www.agendaforhumanity.org> for a resumé of the Grand Bargain or ICVA, "The Grand Bargain Explained: An ICVA Briefing Paper," March 2017, https://www.icvanetwork.org/system/files/versions/Grand_Bargain_Explained_ICVAbriefingpaper.pdf.

6 For a description of the Core Humanitarian Standard and Nine Commitments, see <https://corehumanitarianstandard.org>.

describe lessons learned through the study individual projects, or are aspirational and normative in tone. Across publications, there is insufficient empirical evidence to determine the best way for the international humanitarian architecture to support local actors. As Maxwell describes, “Conclusions about locally led humanitarian action are often too broad—making general statements about humanitarian action and humanitarian actors—and sometimes too specific—small case studies that are interesting but not comprehensive enough for broader comparisons or lessons learned.”⁷ Furthermore, little is known about how localized aid plays “at different phases of crisis response, particularly in the kinds of chronic and complex emergencies where the lines between emergency assistance, relief, and recovery are blurred.”⁸ Until now, progress towards localization goals as laid out in the Grand Bargain has largely been measured as a function of funding streams—how much the international community is providing directly to national or local organizations. To date, direct funding to local and national responders has been very low, and progress toward the commitments quite slow.⁹ While this is an important indicator of change, this project seeks to understand more deeply the range of factors that enable and hinder local actors from providing a high-quality, principled and effective response.

7 Daniel Maxwell, “Local Humanitarian Action: Background, Key Challenges, and Ways Forward,” Keynote Address to the Meeting “Advancing Local Humanitarian Leadership” (Tufts University, February 13, 2018), 9.

8 Maxwell, “Local Humanitarian Action,” 9.

9 Development Initiatives, “Direct Funding to Local and National Responders Shows Slow Progress,” Briefing, June 2018.

B. Research questions, methodology, and limitations

Our inquiry begins with the recognition of four assumptions that dominate the discourse on localization of humanitarian aid, which postulate that local actors 1) are less principled in their response; 2) have less operational and organizational capacity; 3) provide a lower-quality response; and 4) have a lower cost than responses implemented by international organizations.¹⁰ We seek evidence to support or refute these assumptions while adding nuance to the predominant discourse. Our overarching research inquiry seeks to understand more specifically what the factors are that enable or hinder local actors from providing a high-quality, principled, and effective response, from the perspective of local actors.

As such, the research project was designed to address this inquiry predominantly with the voices of local actors, and the sample reflects this preference. While members of the regional and international community also participated in this study, findings and recommendations are primarily organized around the perceptions of LNGO community members and their reported experiences. Such a choice simultaneously represents a strength and limitation of the project. On the plus side, the design allows for a heretofore under-represented group to express its views on the localization agenda to an international audience. The downside is that

our ability to triangulate the perceptions of LNGO members with those of other international actives is limited, which necessarily creates a bias in results. Such a choice was intentional, given that LNGO perspectives are often under-researched,¹¹ despite their central role in the humanitarian response and the localization agenda.

Kenya, Somalia/Somaliland, and South Sudan were chosen as cases because they represent a contrasting set of circumstances from which to study localization processes. Somalia/Somaliland and South Sudan are largely viewed as protracted complex humanitarian crises, characterized by regular cycles of conflict and natural disaster. Kenya is largely considered a development setting, with an overall aim of reducing poverty and improving governance and political stability.

The sample for this study was populated largely by staff of local organizations. Our sample was thus constructed giving preference to local organizations. By local organizations, we refer to local and national governmental authorities, as well as local and national non-governmental organizations (LNGOs) and civil society organizations that are active in one or more humanitarian responses.¹² Some organizations are national in scope, while others operate within limited geographic space. All

¹⁰ Tara Gingerich and Marc Cohen, "Turning the Humanitarian System on Its Head," Research Report (Oxfam, July 2015); Wall and Hedlund, "Localisation and Locally-Led Crisis Response"; A. Obrecht, "De-Internationalising Humanitarian Action: Rethinking the 'global-Local' Relationship" (Institut de Relations Internationales et Stratégique, 2014); IFRC, "Localization-- What It Means and How to Achieve It," Policy Brief, 2018. Maxwell, "Local Humanitarian Action"; Ben Ramalingam, B. Gray, and Giorgia Cerruti, "Missed Opportunities: The Case for Strengthening National and Partnership-Based Humanitarian Responses" (Christian Aid, CAFOD, Oxfam, Tearfund, ActionAid, 2013); de Geoffroy et al., "More than Money."

¹¹ Wall and Hedlund, "Localisation and Locally-Led Crisis Response"; Svoboda et al., "Holding the Keys."

¹² We follow the definitions of "local" as laid out in the IASC Localization Marker Definitions paper (2018), which specifies local as: national NGOs and civil society organizations (CSOs); local NGOs/CSOs; Red Cross/Red Crescent National Societies; local and national private sector organizations; national governments and local governments. Available at: https://interagencystandingcommittee.org/system/files/hftt_localisation_marker_definitions_paper_24_january_2018.pdf

have had funding relationships with international organizations such as the UN and/or INGOs. In Kenya and Somalia/Somaliland, the longest-operating LNGOs in the sample had a presence since the early 1990s, while in South Sudan this was slightly later, dating back to the early 2000s.

The body of this report focuses on the common themes arising from interviews conducted with LNGOs in Kenya, Somalia/Somaliland, and South Sudan in the first quarter of 2019, and buttressed with interviews conducted with staff of international entities. Fifty-two interviews were conducted with the following organizational representatives: 24 interviews with LNGOs, 7 with local governmental authorities, 1 with the Red Cross/Red Crescent Society, 9 with INGOs, 5 with the UN, and 6 with members of national or international networks. In total, 21 interviews were conducted in Kenya, 21 in Somalia/Somaliland, and 10 in South Sudan. Field research for the Kenya case was conducted in the Turkana region, which is considered a longer-term development context that suffers from periodic emergency conditions related to drought. For Somalia/Somaliland, research was conducted in Hargeisa (Somaliland) and Garowe (Somalia). Some organizations had local coverage, while others had national reach. Research in South Sudan was conducted in Juba, but with local organizations that had operations in Eastern Equatoria, Jonglei, Northern Bahr el Ghazal, Warrap, and Lakes.¹³ In order to narrow the scope, we purposively targeted organizations that work either with cash transfers or in the education sector, or both. The sample was primarily one based on convenience, and this study does not claim to be representative of each country, or the region.¹⁴

13. In line with UN practice, we refer to the South Sudanese locales with their pre-2005 names.

14. Please contact authors for a more thorough description of research methods, including interview guides and a description of potential biases.

C. Findings

Summary

The following provides a snapshot of the study's main findings across Kenya, Somalia/Somaliland, and South Sudan. In effect, we identify the factors that enable and hinder a timely, appropriate, quality, and principled response—primarily from the perspectives of local organizations active in humanitarian action. Enabling factors include

proximity to conflict-affected communities, organizational capacities, strong downward accountability to affected communities, engagement with coordination bodies, and wide geographic coverage. Hindering factors relate to rigid and short-term funding mechanisms, competition with INGOs, lack of core funds to support organizational capacities, and limited or poorly designed capacity-strengthening opportunities. Each of these points will be elaborated on in the body of the report, and recommendations will be provided at the close.

Box 1. Factors that enable and hinder a timely, appropriate, quality, principled response

Factors identified by LNGOs that **enable** a timely, appropriate, quality, principled response:

- Proximity to conflict-affected communities:
 - Shared language and local contextual knowledge;
 - Physical closeness;
 - Social connectedness and trust;
 - Long-term presence;
 - Relationships and collaboration with local stakeholders, governmental authorities, and gatekeepers;
 - Ability to negotiate access.
- Organizational capacities:
 - Qualified staff and ability to retain them;
 - Access to physical assets to support organization;
 - Fundraising skills and relationships with potential governmental and non-governmental donors;
 - Technical skills for operations;
 - Systemic strengths (management, procurement, risk management, MEAL, HR);
 - Strong leadership and strategic planning skills;
 - Strong coordination.
- Staff from affected communities;
- Relationships across ethnic groups and/or clans and expansive geographic coverage;
- Participatory needs assessments with affected communities as well as local actors;
- Strong downward accountability mechanisms.

Factors identified by LNGOs that **hinder** a timely, appropriate, quality, principled response:

- Lack of direct funding available to LNGOs;
- Inflexible or short-term funding;
- Lack of direct access to and relationships with donors;
- Lack of access to capacity-strengthening activities;
- Capacity strengthening ill-matched to organizational needs;
- Capacity strengthening focused on upward accountability to donors;
- Lack of a graduation process as NGO capacity is strengthened;
- Direct competition with INGOs for funding;
- Direct competition with INGOs for implementation;
- Lack of dedicated staff and systems for fundraising;
- Lack of core funds;
- Pre-designed assistance and/or donor priorities that conflict with predominant needs;
- Inability to program across sectors or to design holistic programs;
- Lack of trust between international and local organizations;
- Rigid risk mitigation plans, narrow definitions of risk, or shifting burden of risk to LNGOs;
- Lack of funding for advanced MEAL systems.

Proximity and humanitarian access

Local organizations have long been appreciated for their ability to access communities in need, particularly in insecure settings. Access is essential for humanitarian action, and there is a growing consensus that local organizations have a clear advantage over international bodies in this respect.¹⁵ This study unveiled the importance of access, but also found the concept of *proximity*—of which access is a part—to be extremely relevant in Kenya, Somalia/Somaliland, and South Sudan. Proximity can be both complex and relative, and is inextricably linked to notions of “local,” as Maxwell describes it: “It [local] can be based on geographic proximity (‘I live in the affected area’), proximity to the disaster (‘I was directly affected by the disaster’), social proximity (‘My family was directly affected by the disaster’), ethnic or religious proximity (‘I speak the same language as the affected people’), or national proximity (‘I have the same passport of the affected people’).”¹⁶ Our fieldwork demonstrates the salience of these aspects, in addition to proximity as a temporal and relational concept, as described below. We find that proximity—with this expanded definition—is one of the factors that determines an organization’s ability to provide a timely and appropriate response, and it is generally a comparative advantage held by local organizations.

Representatives of local organizations in all three countries described that their close physical proximity to affected communities is a crucial determinant for providing a timely response. This kind of proximity allowed for the rapid recruitment of staff from crisis-affected areas and the ability to quickly set up offices on site. A long-term presence, even predating contemporary crises, facilitates the development of networks and relationships with communities. In South Sudan, this was named as an advantage for LNGOs, allowing them to

respond rapidly when crises occurred. In Kenya, a long-term presence was linked to an organization’s ability to adapt during emergencies and changing contexts. This is particularly important in Turkana, a context that is characterized by longer-term development needs, but periodically faces climate-related shocks. As described by a representative of a local organization, “During the drought, we change from development to humanitarian work. One of the advantages of being a local organization is that we have the capacity to respond to that.”¹⁷ Proximity might also facilitate easier access to local resources. In addition to office location and local staff, representatives of LNGOs report that they are able to identify, easily understand and engage, and access and utilize locally available resources to support affected populations. These advantages were recognized in Somalia/Somaliland, where representatives of the UN and INGOs stated that among their primary reasons for working with LNGOs is their ability to access complex areas, their contextual knowledge, and their “community ownership.”¹⁸

An additional aspect of proximity relates to the ability of an organization to possess intimate knowledge about the needs of affected people and their environment. This includes collaboration with local stakeholders, including local governmental authorities, chiefs, and youth, all of whom are important interlocutors to affected populations. According to representatives of local organizations, deep communal connections can facilitate more-accurate needs assessments and prioritization, and thus a more tailored, appropriate response. In Kenya in particular, many of the attributes that enabled a timely response were linked to relationships with other local humanitarian organizations and community groups, and the reliance on networks of volunteers in church groups, youth clubs, health centers, and schools. These connections supported referral mechanisms and allowed LNGOs to provide

15 Gingerich and Cohen, “Turning the Humanitarian System on Its Head”; Saleem Haddad and Eva Svoboda, “What’s the Magic Word? Humanitarian Access and Local Organizations in Syria,” Working Paper (Humanitarian Policy Group at ODI, March 2017); Svoboda et al., “Holding the Keys”; Christina Bennett et al., “Planning from the Future: Is the Humanitarian System Fit for Purpose?” (HPG ODI; Tufts FIC; King’s College, November 2016).

16 Maxwell, “Local Humanitarian Action,” 3.

17 Interview with NGO representative, Turkana, Kenya, February 2019.

18 Interviews with INGOs and UN, February 2019.

a more timely and tailored response. Here we see different elements of civil society (beyond formal humanitarian bodies) linking with local organizations to meet the humanitarian and development needs of communities. The above findings are reflected in an earlier study in South Sudan, which found that a humanitarian response led by local and national organizations was beneficial because interventions were highly relevant due to their proximity to conflict-affected populations. The study also pointed to local organizations' ability to react effectively in terms of timeliness, open communication channels, and downward accountability to communities.¹⁹

Physical presence and social connectedness are thought to increase the trust of affected populations. Such communities described that LNGOs are more invested in the long term—above that of international organizations. Put plainly by one LNGO representative in South Sudan, “[We hire] locally recruited staff who directly deal with their own people and hence, much trust is put on them and the organization they work for,” facilitating an effective response.²⁰ Relational aspects of proximity, which may involve shared suffering of responders and communities, are likely to further enhance trust, allowing for the possibility of continued access, as well as appropriate and quality responses. For example, one organization described that they displaced with the community as a result of armed conflict, which meant that they were able to continue programming with little interruption.²¹ Another representative of a local organization described, “We remain with the people, unlike international organizations that withdraw in times of insecurity, which creates a vacuum. The LNGO has nowhere to go.”²² Such behavior represents the inverse of remote management programming—where international staff relocate to safer locations when physical risk intensifies.

Local organizations are given credit—both in local and international circles—for their ability to negotiate humanitarian access in complex situations.²³ They are believed to be better positioned to manage the dynamics of conflict space due to their intimate contextual knowledge and relationships with various armed and unarmed actors.²⁴ At the same time, a recent study of the humanitarian response in Syria and Ukraine demonstrates that while local actors had better humanitarian access, the constraints related to access are similarly challenging for both international and local organizations. While there is significant value in being local, it is not wholly adequate, as local agents are also subject to the whimsical behavior of armed actors and must manage “temporary windows of opportunity,” engage in compromise and negotiation, guarantee the relevance of aid, and manage other idiosyncrasies of space, time, and relationships.²⁵

Somalia/Somaliland and South Sudan are no exception to thorny issue of access. In many instances, there would be no humanitarian response without the work of local organizations. When describing their strengths, local organizations were adamant that they were able to maintain access to vulnerable populations in highly dangerous areas. In Somalia/Somaliland, this meant understanding complex clan dynamics and politics, and continuously negotiating space with local authorities, clan representatives, and other key stakeholders. Access can be hyper-localized, as described by this regional representative who works closely with local organizations: “In South Sudan, local beneficiaries wouldn’t accept the presence of any aid worker from another region. They required that the local organizations be staffed entirely by locals.”²⁶ This configuration, however, may cause concern among some staff of INGOs, who fear that this type of

19 Christian Aid et al., “Missed Out: The Role of Local Actors in the Humanitarian Response in the South Sudan Conflict,” 2016.

20 Interview with LNGO representative, South Sudan, February 2019.

21 Interview with LNGO representative, South Sudan, February 2019.

22 Interview with LNGO representative, South Sudan, February 2019.

23 Interviews with INGO representatives Somalia/Somaliland and regional representatives, Nairobi, February and March 2019.

24 Haddad and Svoboda, “What’s the Magic Word? Humanitarian Access and Local Organizations in Syria.”

25 Svoboda et al., “Holding the Keys.”

26 Interview with regional representative of INGO, March 2019.

response could easily violate humanitarian principles of impartiality and neutrality.²⁷ For example, a UN representative of Somaliland/Somalia said, “In terms of who can meet humanitarian principles best, both [LNGOs and INGOs] can do it, but LNGOs are more challenged because they are under multiple local pressures that they have to navigate.”²⁸

As with all humanitarian operations, representatives of local organizations in all three countries explained that access was not always constant. In Kenya, this was mostly related to unpredictable weather conditions and insecurity, while in South Sudan flare-ups with localized fighting led to temporary suspension of humanitarian activities but not permanent closure of operations. Related to the concept of proximity, two organizations in South Sudan described that close collaboration with key stakeholders and line ministries allowed them to mitigate potential security problems—demonstrating the efficacy of local-national connections. Also in South Sudan, poor road infrastructure and flood-prone areas sometimes inhibited access, as did restrictions placed by government on movement. In Somalia/Somaliland, some local organizations reported that certain vulnerable populations could not have their needs assessed due to challenges with physical access (lack of passable roads or areas only reachable by boat). A lack of government presence in highly contested areas meant that information about vulnerable populations was not always reaching aid organizations. However, this was not the case reported in all interviews; some local organizations stated that they had continual access to all areas in which they operated.

While proximity is largely a characteristic attributed to LNGOs, there are some nuances to the discussion. For example, in many contexts, there is a steady migration of national staff from local organizations to international organizations. Hiring of national staff may be one strategy used by international organizations to preserve their proximity to crisis-affected communities. While this may be an improvement over an entirely international staff,

organizational policies including risk mitigation practices tend to preserve a distance between staff and communities in need. Thus, the same individual may lose proximity as he/she moves from a local to international organization. In addition, being embedded in complex local power dynamics and social structures may not always benefit a humanitarian response. In some cases, an international organization may be welcome by a community as a more “neutral” actor who exists outside the web of local politics.

Capacities as conceived by the local organizations

The following section highlights, from the perspective of members of local organizations, the essential capacities for an effective response. Essential capacities were defined as technical skills and organizational resources, and these capacities were seen as a prerequisite for working with international organizations and donors, and thus the key to sustainable funding. LNGOs tended to report gaps in these capacities within their own organizations and explained that capacity-strengthening opportunities from international organizations were few or inefficient.

Definitions: In all three countries, we asked representatives of various local organizations what they believed were the necessary capacities to engender an effective response, where their own organizations needed improvement, and the best modalities for improving capacities. As interviewers, we did not define the concept of capacity but rather allowed study participants to follow their own interpretation. Local organizations in this sample tended to identify similar types of capacities as “priorities” for an effective response. The following box provides a summary of capacities identified across all three cases studies.

27 Interview with INGO representative, Kenya, February 2019.

28 Interview with UN representative, Somalia/Somaliland, February 2019.

Box 2. Capacities identified by LNGOs as necessary for effective humanitarian action²⁹

- Expertise and professionalism of board members and staff
- Ability to retain qualified staff
- Sector-specific technical skills
- Strong procurement systems
- Strong human resources and management systems
- Strong MEAL and compliance systems
- Strong logistical abilities
- Strong communication systems
- Strong strategic planning
- Resource mobilization and fundraising skills
- Physical assets to support programs
- Strong risk mitigation systems
- Strong coordination in cluster system and with humanitarian actors, as well as government and community stakeholders
- Access to and strong relationships with INGOs, donors, and embassies
- Ability to lobby and advocate local governments and relevant ministries for effective support for communities

As can be seen above, most of the capacities are organizational or technical, while a minority are relational in nature. In brief, LNGOs identify the term capacity with strong systems (management, HR, logistics, communications, MEAL, compliance, risk mitigation, procurement); strong leadership; financial resources and the ability to fundraise; strong coordination; and technical capacities that support operations. Notice that most capacities listed are those likely to be lauded by donors and INGOs and are characteristics that make an organization competitive for funding—what we call “upward-facing capacities.” In interviews, both LNGOs and international organizations tended to view capacities as something that INGOs choose to give or not give to LNGOs. *Such conceptions contrast with descriptions provided by these same organizations about what factors make a response appropriate and timely.* These included what we conceive of as “downward-facing capacities” such as proximity, humanitarian access, local knowledge, and trusting relationships with stakeholders and crisis-affected communities.³⁰ These differences are in line with previous research, which demonstrates that local and international organizations are divided on how they define capacities and which attributes are most highly valued.³¹

Even within a single concept, representatives of LNGOs and INGOs did not always operationalize the same capacity similarly. For example, in Somalia/Somaliland, when LNGOs named “access” as an important capacity, they were both referring to humanitarian access to affected communities *and* to direct connections with donors. They expressed a wish to participate in platforms where back-donors and large institutional donors were present, believing they were better interlocutors for communities in need than the further-afield INGOs. In the same context, when international agencies talked about “access” as capacity, they were referring to an LNGO’s ability to work in otherwise restricted areas. Different capacities were also emphasized across cases. In Kenya, for example, relationships with local government were highlighted as an organizational capacity because they improved service delivery to communities and helped keep the government accountable to its citizens.

The ability to retain qualified staff was a capacity cited as influential in an effective response—but one that was described as a challenge for LNGOs. In Somalia/Somaliland, staff who worked with international bodies were perceived to be more professional and skilled than those working for

29 For a contrasting study on INGO perspectives of NGO capacities for the Syria case, see Kimberly Howe and Elizabeth Stites, “Partners under Pressure: Humanitarian Action for the Syria Crisis,” *Disasters*, 2018.

30 We acknowledge that this may be an inherent bias of the research, as interviewers are representatives of the international community.

31 See Howe and Stites, “Partners under Pressure.”

LNGOs. As described to the research team, a career in humanitarianism would include starting within lower-paying, smaller LNGO and “graduating” to a higher-paying INGO or UN body. Organizations reported that they would preferentially hire national staff who had worked with international entities. One LNGO representative explained that a single INGO currently employed eight of their former staff. Another said that LNGOs are a type of recruitment base for international entities.³²

A similar story unfolded in South Sudan, where representatives from LNGOs explained that there is “stiff competition” for qualified staff between LNGOs and INGOs. INGOs, because they have access to resources, are more able to recruit better-qualified staff by offering higher salaries. At the same time, less-qualified staff need more training, and such resources are not available to local organizations. LNGOs also face problems with retaining qualified staff, as INGOs sometimes “poach” their best employees.

Capacity strengthening: The attitudes and perceptions in interviews in the region reflect a broader trend, the tendency for “capacity building” to be a commodity that is handed down from international organizations and received by local organizations. While capacity is a buzzword of sorts, it is not always clear what it means or how it is achieved. During an interview with a representative of a Somalia/Somaliland LNGO, the representative underscored the amorphous nature of this concept. While his organization had worked in the humanitarian field for many years and engaged in a wide variety of projects, he wanted to know, “When will we have ‘enough’ capacity?”³³

For this study, we asked local organizations to provide an analysis of the best ways to support their organization in capacity strengthening.

Representatives were often able to describe what had *not* been helpful—the activities, styles, and approaches that were ineffective or underappreciated. For example, many capacity-strengthening activities are focused on upward accountability instead of downward accountability. As this LNGO representative in South Sudan described, “INGOs tend to have an inward-looking lens when assessing us. For example, compliance toward *them* is not what we need in order to be a better organization.”³⁴ This was echoed in one research review that showed that “capacity building” sponsored by international organizations is focused on having local organizations fulfill a range of accountability mechanisms and obligations to donors.³⁵ Research has shown elsewhere that this type of self-serving capacity building is not lost on local actors—whether in Syria, Ukraine, or Europe.³⁶ On the one hand, local actors are appreciative of the support they receive from international organizations, which allows them to access and comply with a specific grant. On the other, such top-down mechanisms have left some LNGO representatives wondering if the crisis-affected person is really at the center of the response.

In this study, we also found that capacity building is uneven, and those organizations that might need the most support are the least able to engage in what the international organization offers. For example, in South Sudan, one LNGO representative explained that “Capacity building happens at the Juba-level, leaving field staff out as it is too expensive for them to go to Juba to attend meetings. These expenses are not approved by INGOs, and the UN and LNGOs do not have such resources.”³⁷

Other organizational representatives wondered why capacity building had to be so uniform and untailored to individual organizational needs. This mismatch has been written about in other contexts,

32 Interview with representatives of three LNGOs, Somalia/Somaliland, February 2019.

33 Interview with representative of LNGO, Somalia/Somaliland, February 2019.

34 Interview with representative of LNGO, South Sudan, February 2019.

35 Larissa Fast, “Upending Humanitarianism: Questions Emerging ‘from the Ground Up,’” Briefing Note (Humanitarian Policy Group at ODI, December 2017).

36 Fast, “Upending Humanitarianism”; Howe and Stites, “Partners under Pressure.”

37 Interview with representative of LNGO, South Sudan, February 2019.

with research showing that capacity building is often top-down, ill-matched, or inefficient.³⁸ Representatives of local organizations in all three cases provided some insights on ways to improve capacity-strengthening endeavors. For example, in Kenya there was a call for additional collaborative learning with other local organizations working in similar program areas. It was pointed out that those organizations that excel in particular areas could engage in knowledge exchange with others. Also in Kenya was the recognition that it is not just INGOs that had the skill to provide LNGOs with capacity strengthening—ministries, local governments, and religious bodies were seen as important actors in providing this type of support. In South Sudan, it was suggested that capacity strengthening be conceived of as a longer-term endeavor, whereby INGOs could provide a kind of “priming system” to LNGOs in the form of periodic training and testing in order to improve skills incrementally. Similar suggestions came out of regional networks of humanitarian organizations, whereby it is suggested that INGOs work with LNGOs and help them reach a certain level, at which point they could “graduate” to having direct contact with donors.³⁹ Mentoring, where INGOs second staff to LNGOs, was at times suggested or even piloted, although the quality in this model varied widely. Currently, the motivation across international actors to explore and streamline these alternative capacity- strengthening methods appears low, and the majority of activities continues to be one of trainings that are often repetitive and not specifically tailored to LNGO needs.

Which type of organization is fit for purpose?

Interviews with representatives of local organizations in all three countries provided a nuanced view of which types of organizations are better suited to provide an effective response. Broadly speaking, interviews highlighted the added value of local organizations in terms of their ability to respond quickly and appropriately due to their connections to and local knowledge of affected communities. At the same time, it was recognized that they did not

have the same strength in institutional capacities as their INGO partners. These reflections mirror the discussion above on capacities. Questions about LNGO capacity continue to sit in the minds of INGOs, as reflected in this statement: “Direct funding to LNGOs is OK, but they just can’t take over all the functions of internationals. It’s OK to work with more of them, but they need more capacity strengthening, and it has to be a very gradual process to work more locally.”⁴⁰

In Kenya, interviewees described that INGOs were better equipped in their organizational capacity to respond—because of their administrative structures, financial stability, trusting relationship with donors, and their experience with operations. This same set of interviewees noted that local organizations suffer from a lack of direct relationships with donors—this lack of relationship was seen to exacerbate delays in funding. The self-assessment of capacities for local organizations in Kenya showed weaknesses in many organizational procedures—standard framework agreements, and transparency and accountability mechanisms—and a resulting lack of funds. One LNGO representative stated, “If we could improve in these areas, we would be best placed to assist the most vulnerable [over INGOs].”⁴¹

Interviews in South Sudan painted a similar picture. Some LNGOs were adamant that they were better suited to provide an effective response because of their proximity to local populations and their continual long-term presence in such communities. In Somalia/Somaliland, another LNGO representative suggested that INGOs should raise the funds while LNGOs should implement, due to their comparative advantages. Other LNGO representatives appreciated that both international and local responders have unique strengths and weaknesses but that an ideal response would be a combination—where both sets of organizations work together. One described this complementarity: “Both have a role to play. LNGOs have a local touch, contextual understanding but not enough financial

38 Howe and Stites, “Partners under Pressure.”

39 Interview with leader of regional humanitarian network, Nairobi, February 2019.

40 Interview with INGO representative, Somalia/Somaliland, February 2019.

41 Interview with LNGO representative, Kenya, February 2019.

42 Interview with LNGO representative, South Sudan, February 2019.

resources. INGOs have funds but not contextual knowledge or access, and they are often slow due to bureaucracy. They should work together.”⁴²

Costs

While it is beyond the scope of this study to measure the economic differences between LNGO and INGO operational costs, we did solicit the opinions of several organizational representatives on the topic. For those included in the sample, there was a consensus that LNGO costs are significantly lower than INGO costs. Some UN organizations that reviewed proposals coming from both local and international organizations for the same project estimated that the LNGO costs could be up to half of INGO costs. There were several explanations for this, including: the lack of overhead costs charged by LNGOs; differences in staff salaries, with INGO rates being much higher; and administrative costs of international entities, including support for headquarters. As one representative from an international humanitarian network explained, “Being national by definition means lower costs.”⁴³ Some interviewees linked lower cost with response effectiveness and a response more closely aligned with the Core Humanitarian Standard (CHS). In particular, this refers to CHS 9, which states that organizations assisting people in need should be “managing resources effectively, efficiently and ethically.”⁴⁴ The higher administrative costs of INGOs, as seen by representatives of LNGOs in Somalia/Somaliland, meant for them that the overall amount of assistance going to crisis-affected communities is reduced, leading them to question the ethics and efficacy of this model.

Given lower costs, one could ask why donors are not more open to directly funding LNGOs. Aside from

concerns about risk, the overwhelming perception is that donors do not have the resources to manage smaller grants or the bandwidth to expand their partnership portfolio. Thus it is easier to give larger grants to fewer “trusted” organizations such as the UN or INGOs and entrust those bodies to engage in a localization agenda that supports an effective humanitarian response. In the words of one international representative, “Donors want a national version of Oxfam that they can fund in country. It isn’t easy for donors to fund multiple small organizations—there are never going to want to do this.”⁴⁵ It is interesting to note, however, that many LNGOs perceive that INGOs block their direct access to donors. While this may be the case, it is also perceived that there is not a significant interest on the part of donors to engage with LNGOs. Networks of humanitarian organizations may help to fill this responder-to-donor gap, serving as interlocutors between donors and LNGOs, such as the Somalia and South Sudan NGO Forums, the NEAR and START networks which are active in the region, as well as Accelerating Localization through Partnerships and ICVA.⁴⁶

Donor and INGO practices: the view from below

Donor priorities have been found to regularly trump the local context. Restrictions by donors, including vetting, reporting systems, and branding—emanating largely from low tolerance for risk—often preclude the meaningful participation of local actors.⁴⁷ Donor requirements have been found to significantly burden local organizations and directly diminish their operational and organizational capacities—and thus their effectiveness—in a variety of contexts of remote management or otherwise.⁴⁸ In the Horn of Africa, we explored the factors that enable local

42 Interview with LNGO representative, South Sudan, February 2019.

43 Interview with representative of global humanitarian network, February 2019.

44 For a description of the Core Humanitarian Standard and Nine Commitments, see <https://corehumanitarianstandard.org>.

45 Interview with representative of global humanitarian network, February 2019.

46 For more localization initiatives and projects, see https://media.ifrc.org/grand_bargain_localisation/grand-bargain-localisation-workstream/resources/.

47 Gingerich and Cohen, “Turning the Humanitarian System on Its Head.”

48 Howe and Stites, “Partners under Pressure”; de Geoffroy et al., “More than Money,” 8.

actors to provide an effective response and those that hinder them from doing so, including the roles of donor and INGO intermediaries in this delicate equation.

Funding: Representatives of local organizations regularly described that limits in funding, both in amount and form, often curtailed their ability to provide an effective response. This theme is not new, as flexible funding schemes, longer time horizons, and multi-year partnerships are common recommendations that surface in research and policy documents.⁴⁹ LNGO representatives from all three countries said that funding shortfalls inhibited an effective response—the need was always greater than resources. But aside from inadequate funds, there was also the complaint that funding was neither stable nor predictable. In South Sudan, one LNGO representative explained, “Inadequate funds that come irregularly from donors delay or even limit the operations of LNGOs...the funds are restricted to specific activities and places, so this limits the provision of services to some areas in need.” As stated by this representative of a national network of humanitarian organizations in Somalia/Somaliland, “LNGOs are burdened because they have access to the locations most prone to disasters and crises, but it is precisely there where funds are the least flexible.”⁵⁰ In Turkana, LNGO representatives explained that some organizations were not able to respond to emergencies as they arose because they were not pre-specified in the budget and could not be reallocated. This made it impossible for the organization to respond in a timely manner.

Related to flexibility as well is the interest of accessing funding that allow for a more holistic approach to crisis-affected communities. This request was specific to accessing funds that could support multiple sectors, and those that might bridge the humanitarian and development contexts. The latter was particularly valued given the protracted crisis in South Sudan and is certainly

similar to Somalia/Somaliland’s context. Turkana in Kenya, while primarily a longer-term development context, also experiences periodic emergencies, where such a blended approach is also appropriate.

Local organizations are often not able to include core funds in their proposals, rendering them reliant on funding tied to specific projects. At the same time, core funding is increasingly recognized as one of the most effective ways to strengthen the organizational capacity and sustainability of small civil society organizations.⁵¹ International agencies usually use these core, unrestricted funds to cover funding gaps, retain staff between project grants, provide seed funding for new or emerging priorities, and buffer against unexpected financial shocks. Local organizations will often need these for the same purposes. While it is widely believed that donors are against paying core costs to LNGOs, this is not entirely true. Rather, some donors are often unwilling to pay overhead twice on a single grant. The vast majority of funds that are received by LNGOs run through an INGO intermediary. The most recent research on this topic shows that only 4% of funds in Somalia and South Sudan were provided directly to LNGOs.⁵² As such, it is the INGO that recuperates the core costs in their own budget, and this is not passed down to local organizations. Other donors are simply unaware that this funding is not being made available. Many international organizations’ partnership policies allow for the transfer of unrestricted funds, but they are often discouraged from exploiting these opportunities, potentially because of risk-aversive institutional cultures.

Core costs for LNGOs is a top agenda item for advocates in the Horn, as this is one of the inequities between INGOs and LNGOs that is perceived to be highly unjust and to contribute to a number of negative consequences. One advocate of a regional humanitarian network said that when local organizations function without overhead costs, it actually “means that local actors are co-

49 Howe and Stites, “Partners under Pressure”; IFRC, “Localization-- What It Means”; Barnaby Willitts-King, Mo Ali Nisar Majid, and Lydia Poole, “Funding to Local Humanitarian Actors--Evidence from Somalia and South Sudan,” Policy Brief (Humanitarian Policy Group at ODI, October 2018).

50 Interview with representative of national network of local and international humanitarian organizations, Somalia/Somaliland, February 2019.

51 Howe and Stites, “Partners under Pressure”; Geoffroy et al., “More than Money.”

52 Willitts-King et al., “Funding to Local Humanitarian Actors.”

financing international programs.” She speculated that this actually might encourage corruptive practices, as LNGOs search for ways to pay for basic operational costs.⁵³ LNGO representatives in Somalia/Somaliland stated that a lack of core funds challenged their ability to retain staff, to develop the strategies of their organization, and to fundraise—all of which impact sustainability. Interestingly in Somalia/Somaliland, those organizations interviewed that had access to UN sources of funding (such as the Somalia/Somaliland Humanitarian Fund) were the ones that had managed to secure unrestricted funds from other sources—namely from diaspora or returns on investments. They were also the organizations that had been operational the longest. In South Sudan, one of the organizations spoke about the difficulty in accumulating assets (e.g., computers, office space, vehicles) in the absence of core funding. As a result, they were not able to scale up their operations to something bigger than individual projects. In Kenya, most LNGOs worked from project to project and did not receive core funding.

Interviews with LNGO representatives indicate that it is not just complete dependence on project funds that creates a strain on organizational capacities but also short-term funding cycles. This research matches with other studies, such as Gingerich and Cohen’s review, which states: “Short funding cycles are particularly problematic for L/NNGOs, because they require recipients to spend more time researching and applying for funding; make it more likely that programming will be reactive rather than strategic; and can impede L/NNGOs’ accountability to the populations they serve, since they must focus heavily on accountability to donors.”⁵⁴ The unwillingness to pay for overhead or to provide unrestricted funds is perceived as a hypocritical practice by LNGOs. On the one hand, it is widely recognized that LNGOs need to, in general, have better organizational capacity in order to access humanitarian funding. One of the best ways to support organizational capacity, aside from the transfer of knowledge, skills, and expertise, is to have access to unrestricted funds to support the standing

and developing operational and organizational functions of the organization. On the other hand, this is precisely what LNGOs have trouble accessing.

Relationships: One theme that arose in interviews with both local organizations and regional networks was how donor practices related to funding cycles and priorities can weaken not only LNGO-INGO relationships but also essential relationships on the ground. For example, representatives of LNGOs in South Sudan said that there is often a significant lag time between conducting community needs assessments and receiving funds. Long wait times and a lack of a rapid response capacity prolong the suffering of crisis-affected communities. It also prevents appropriate aid from being received at the correct time. For example, in Somalia/Somaliland, representatives of LNGOs described that assistance intended for a drought response was so late that it arrived after the rains already started. What is often not acknowledged is how such practices damage the reputation of local organizations in the areas where they work. As described above, trusting relationships are fundamental for maintaining access and are perhaps one of the most important capacities that local organizations possess.

Another dynamic that was reported to reduce trust at the local level was the ways in which international organizations earmarked funds or pre-designed programming packages. For example, local organizations may conduct needs assessments, and communities are clear on what their priorities are. However, decisions made either at the INGO intermediary level or donor level determine what type of assistance ultimately arrives in that location, and this often does not match with the identified priorities. For example, a pre-determined agenda set by the international community may mean that crisis-affected communities are provided with protection and awareness interventions when their pressing needs are related to water and food. This chain of action creates several levels of tension. First, communities feel that their voices have not been heard by local organizations, which may weaken or rupture trust. Second, the work of

53 Interview with representative from regional humanitarian network, Nairobi, February 2019.

54 Gingerich and Cohen, “Turning the Humanitarian System on Its Head,” 26.

LNGOs is undermined, and as was described in several interviews, representatives perceive this as a breach of humanitarian principles on the part of internationals. Some LNGO representatives in our sample see a discrepancy between predetermined aid packages and the needs identified on the ground, and feel that as such, assistance is not neutral because it is more reflective of donor preferences than what is coming from objective needs assessments. Cash as an assistance modality was generally seen by LNGO representatives as a way of avoiding these traps, as beneficiaries are able to prioritize and meet their own needs without pre-determination by others.

There was a general unease expressed in interviews with LNGO representatives about the motivations of donors and INGO intermediaries (see also section on perspectives on the localization agenda and Grand Bargain), while internationals often expressed concern over risk related to corruption, aid diversion, and non-adherence to humanitarian principles in relation to the practices of LNGOs. LNGO representatives often questioned the motivations of the international community in forging meaningful partnerships.

The quality of relationships, the meaningfulness of donor procedures, and genuinely effective capacity building were called into question in all three countries. Perceptions abound that INGOs tend to look after their own interests when partnering and forging relationships with LNGOs—often choosing sub-contracting relationships with a pre-determined project design—in other words, LNGOs are “worked through” rather than “worked with.”

As was described in the section on capacities, the way in which capacity building is led by international organizations has provoked some LNGO representatives to question the true motivations of INGOs. For example, LNGO representatives in Somalia/Somaliland said that if INGOs were really committed to strengthening the capacity of LNGOs, they would be more heavily invested in such activities. One measure of goodwill suggested by LNGO representatives in South Sudan would be

for INGO partners to showcase the work of LNGOs (rather than taking credit for it) and provide direct links with donors.

Humanitarian principles

Access is linked closely with the broader discussion of humanitarian principles. Representatives of international organizations regularly question the practices of local organizations in this regard, often suspicious of what concessions must be made—particularly in relation to impartiality and neutrality—in order to maintain access. At the same time, representatives of international organizations engaged in designing risk mitigation strategies. Despite widespread wariness, representatives of local organizations interviewed for this study regularly gave examples of how they employed humanitarian principles as a tool to gain access and as a means to avoid aid diversion. Humanitarian principles were described as values that are embedded within organizations, rather than as an add-on idea emanating from international standards.

In both South Sudan and Somalia/Somaliland, representatives of local organizations stated that they were regularly confronted by the requests of local authorities and armed groups to direct aid toward preferred individuals and groups. As a solution, representatives in both countries explained they would engage members of armed groups and/or influential local leaders in a discussion of neutrality, impartiality, and needs-based humanitarianism—a kind of “awareness raising” for those in control. As described by one representative, “There are ways to work with it, for example setting vulnerability criteria nobody can argue with and must follow.”⁵⁵ Helping gatekeepers understand that aid is destined for the most vulnerable regardless of clan or ethnic group affiliation opened the space for operations. A more dramatic example comes from South Sudan: “In an [redacted] armed group controlled-area, combatants and authorities asked to be added to the beneficiary list and even threatened our staff. In response, we explained that we cannot provide humanitarian

55 Interview with LNGO representative, Somalia/Somaliland, February 2019.

aid to parties to the conflict and explained our vulnerability criteria. We got the military leader of the area to intervene on our behalf and explain for whom the distribution was meant.”⁵⁶ Operations were able to continue in a principled fashion. In Turkana, the local organizations interviewed reported that there had been no interference in their operations, which they attributed to operating in a less-hostile environment and being embedded within the community: “We are here for the Turkana people. We have participation from the ground.”⁵⁷

Other strategies employed by local organizations to prevent aid diversion included the co-design of projects with local communities. For example in Somalia/Somaliland, several representatives of local organizations explained the need for early involvement and ownership of all stakeholders in planning a response, in particular local government entities and clan representatives. This was identified as a “key” to avoiding attempts at aid diversion. In Kenya, local organizations stated that their programs were designed around a community participatory approach, involving community groups and local governments, to help identify and target the groups most in need. Similar themes arose in South Sudan, where involving various segments of the community in a participatory fashion facilitated not just a more appropriate response, but one that was also principled. Interestingly, while this inclusion process was seen as a benefit from the perspective of LNGOs in Somalia/Somaliland, international entities at times saw it as a disadvantage because of the multiple local pressures to navigate and the assumption that doing so could pose challenges in meeting humanitarian principles. Despite these potential pitfalls, such micro-level negotiations and buy-in are often necessary to gain access and may actually discourage attempts at aid diversion.

Risk was a topic most often discussed in interviews

with representatives of international organizations. Risk, from their perspective, was not related to the physical dangers that local organizations face in operations, but rather to the liability faced by international organizations if their local partners engage in corruption, are non-compliant to the policies related to the Global War on Terror, or do not adhere to humanitarian principles. Despite this narrow definition of risk, it is worth noting that national humanitarian staff are much more likely to be injured or killed during humanitarian operations than international staff are across the globe. In 2017 alone, 90% of all aid workers who were victims of violence were local.⁵⁸

Representatives of various humanitarian networks operating within the region tended to see the burden of risk unduly placed on the shoulders of LNGOs. Those closest to the ground perceive the current way of defining and handling risk as unjust. Examples were many, but one network representative said that in Somalia/Somaliland “in 2011, basically all LNGOs were blacklisted even though it was just one or two that had acted in a corrupt way....For INGOs, rather than getting banned, they got more funding and expanded.”⁵⁹ A representative of a national network of INGOs and LNGOs in Somalia/Somaliland said that the international community “places a kind of scarlet letter of LNGOs. They are always risky, always corrupt, and always fragile.”⁶⁰ But both types of organizations face the same types of risks, and LNGOs have higher exposure because of their proximity to conflict and other crises. However, they usually lack the structure and systems that mitigate risk—systems that are well established for internationals—highlighting another dimension of inequity. As this representative wisely stated, “We need to acknowledge risks in the system. Humanitarian action is not about being risk free. We need to make friends with risk.”⁶¹

One INGO that had presence in all three case study

56 Interview with representative of LNGO, South Sudan, March 2019.

57 Interview with representative of LNGO, Turkana, Kenya, March 2019.

58 Humanitarian Outcomes, “Aid Worker Security Report: Figures at a Glance 2018,” 2018, <https://aidworkersecurity.org/sites/default/files/AWSR%20Figures%202018.pdf>.

59 Interview with representative of regional humanitarian network, Nairobi, February 2019.

60 Interview with representative of with a national humanitarian network, Somalia/Somaliland, February 2019.

61 Ibid.

countries stated that their risk calculations are heavily dependent on context and that strategies are adapted to real-time experiences with partners on the ground. For example, in South Sudan they have chosen to work with several local organizations as opposed to a single organization to improve both geographic coverage and the possibility of impartiality. If a partner seems to be performing poorly, the INGO will embed staff within the LNGO to improve quality and compliance.⁶² This willingness to engage with risk head on and adjust partnership strategies accordingly was a unique case among INGOs. While most of the above examples focus on Somalia/Somaliland and South Sudan, the Kenya case provides an important contrast. One regional network representative said that the development context and the strong national ownership of related programming has meant that donors are less concerned with risk—whereas the traditional humanitarian architecture is more risk averse.⁶³

Representatives of local organizations, particularly in Somalia/Somaliland, described three attributes that they perceived as indicators or “proof” of a principled humanitarian response: coverage, downward accountability mechanisms, and strong monitoring systems. Coverage was expressed both in geographic terms—the ability to work in different areas or nationally—and in terms of the ability to provide assistance across clans. In the words of one representative of an international organization, “The ability of LNGOs to work everywhere, both in the East and Western parts of Somaliland, means that we have passed the obstacle [of not being principled]—and can meet humanitarian principles. Their ability to work everywhere proves that.”⁶⁴ LNGO representatives also stated that having staff representing multiple clans allowed not only access to a diversity of areas but also provided a type of insurance that no one clan would receive preferential treatment—as staff from other clans would not tolerate this.

Downward accountability was described in all

three countries as way of ensuring a principled response. Inclusion of beneficiaries and community representatives in project design and providing multiple fora for feedback mechanisms allow communities to hold aid organizations accountable. Similarly, representatives of LNGOs said that regular monitoring and evaluation of activities provides evidence of a principled response. However, it should be noted that LNGOs reported not having the resources to engage in the same degree or quality of monitoring and evaluation as INGOs (e.g., third-party monitoring, complex research design). At the same time, LNGOs are more likely to work in areas that challenge straightforward monitoring and evaluation—a source of tension for LNGO-INGO partnerships. LNGO representatives in Somalia/Somaliland explained that INGOs did not always fully appreciate the barriers faced by LNGOs in acquiring monitoring data. For example, one LNGO representative stated: “Why do international organizations take for granted that our response is not principled...just because it can’t be evidenced? Evidence is particularly difficult in high risk areas.”⁶⁵ INGOs may be quick to perceive difficulty with monitoring as LNGOs not engaging in principled action. While monitoring can be used as evidence of a principled response, the absence of it can be interpreted as a sign of corruption, aid diversion, or non-principled action. One risk of such a simplified understanding is that LNGOs may become demotivated to work in hard-to-reach or complicated areas.

Perspectives on the localization agenda and the Grand Bargain

While the overall goal of this study was not to critique the commitments set out under the Grand Bargain or the overall localization agenda, some representatives of local and international

62 Interview with INGO regional representative, Nairobi, March 2019.

63 Interview with representative of regional humanitarian network, Nairobi, February 2019.

64 Interview with representative of international organization, February 2019.

65 Interview with LNGO representative, Somalia/Somaliland, February 2019.

organizations operating in the Horn of Africa nevertheless expressed their views on these topics. During interviews, leaders of humanitarian networks stated that international organizations view localization across a large spectrum. Some described INGOs as simply having “localization in their DNA”⁶⁶ while another provided an intricate typology: “There are INGOs that are threatened by the localization issue and still operate with the belief that humanitarian programs cannot be successful without their leadership and their presence. Fundamentally at the core, they [INGOs] are essential to the response, and localization thus threatens their existence. Then there are organizations that are open to hearing more. Maybe they are not as good at localization, or have not done any localization, but they want to consider or think about it. Then there are organizations that are speaking well about localization but not implementing it well. They say all the right things, but some are doing better than others—they are trying to re-strategize how they work. They may be confused, and they don’t know how to do it, but they don’t go against it. Then there are those that are trying to reshape themselves, even if it means putting themselves out of business.”⁶⁷

The localization agenda also plays out differently in each of the three country cases—Somalia/Somaliland and South Sudan were often described in juxtaposition, while Kenya is seen as a unique case apart, because of the focus there being primarily on development. In Kenya, the localization discourse is largely absent among LNGOs, yet Nairobi is a hub for numerous initiatives that support localization. In terms of progress made in the financial commitments of the Grand Bargain, a recent study shows that only 4% of funds were provided directly to local actors in South Sudan and Somalia/Somaliland, with an additional 6–9% received by local actors via one intermediary. Together, this comprises a total of 10 and 13% (South Sudan and Somalia/Somaliland respectively) and still falls

significantly under the 25% commitment put forth by the international community.⁶⁸

As stated by one representative of an international network of humanitarian organizations, “the localization agenda in Somalia/Somaliland has been brewing for 20 years.”⁶⁹ There, several interviewees said that the advocacy channels are strong, and LNGOs are increasingly vocalizing their dissatisfaction with the lack of progress made toward Grand Bargain commitments, continued sub-contracting style-partnerships, and lack of “real” investment in local organizations—whether in terms of core funds, capacity strengthening, or connections to donors.

In Somalia/Somaliland, there is an underlying expectation that internationals should be pulling out, given that local organizations have been operational since the early 1990s. In the words of one advocate, “When I hear an INGO proudly saying that they have been working with the same local organization for 20 years, I say ‘what are you still doing here?’ This is a problem that goes beyond finances, this is about the will of donors and INGOs to truly localize.”⁷⁰ Somalia/Somaliland is an example where regional and global representatives interviewed were quick to point out that many of the national NGOs are operationally and organizationally as strong as INGOs. In interviews with NGO representatives, many expected that the international community would meet the 25% Grand Bargain commitments, and that this would be partly exemplified by a reduction in INGO direct implementation and competition with local organizations for funds. Instead, many felt that there was little or no progress made toward these goals. This led several representatives of LNGOs to conclude that the international community was not serious in their wish for change. “Why do INGOs fear to work with local organizations?” queried one, while another said, “LNGOs feel that INGOs don’t want to share,”

66 Interview with regional representative of INGO and humanitarian network of INGOs and LNGOs, Somalia/Somaliland, February 2019.

67 Interview with representative of regional humanitarian network, Nairobi, February 2019.

68 Willitts-King et al., “Funding to Local Humanitarian Actors.”

69 Interview with representative of international humanitarian network, February 2019.

70 Interview with representative of regional humanitarian network, February 2019.

and yet another stated, "Is the will to meet the commitments really there? There is no will from the INGOs. Many say that they want to, but we don't see anything in action. We are losing trust."⁷¹ Even a representative from an international body expressed skepticism over INGO practices in Somalia/Somaliland: "Maybe international organizations are actually not willing to strengthen the capacity of LNGOs? Currently INGOs are too expensive as it is. But they could strengthen the LNGOs if they really wanted to."⁷²

Despite this negative tone, there does seem to be increasing support going to local and national actors as of 2017.⁷³ From the outside at least, there is an overall sense that "localisation is progressing in Somalia/Somaliland."⁷⁴ Civil society involvement appears vibrant, including "good Somali representation within the Humanitarian Country Team, strong Somali leadership within the Somali NGO Consortium and the Somalia NGO Forum, and new consortia."⁷⁵ Communication pathways seem open between different levels of the humanitarian system, although "it remains to be seen how far these will evolve into meaningful change."⁷⁶

South Sudan, from the regional perspective, was seen as "not ready" to localize. From the outside, local organizations are seen as less experienced in terms of longevity and the ability to fully comply with donor requirements. There was a sense that LNGOs in South Sudan needed more mentoring and capacity building from the international community and that there was not a strong sense of advocacy or urgency (on the part of LNGOs or INGOs) for internationals to pull out any time soon. The absolute number

of LNGOs receiving international support has been increasing, but funding is "not coordinated, monitored or planned," with the majority moving through intermediaries who "both manage the administration burden and carry the risk," and overall amounts of funding remain low. Local organizations report that intermediaries serve a "gatekeeping role" in driving the course of the partnership, determining the type of capacity building provided, and determining the amount of grants.⁷⁷ Capacity building of local organizations is poorly coordinated and at times, repetitive, which replicates findings for the Syria response.⁷⁸

Kenya fits less neatly into the localization schema. Some regional representatives say that Kenya had already been localized. Local organizations, including the Kenyan Red Cross, play a major role in the targeting and delivery of aid, particularly during natural disasters. Because the country is primarily a development context, it is less ensnared by the humanitarian architecture. The majority of funding is longer term (3–5 years), which in theory supports better international-local partnerships. There is more involvement with the private sector, and the response and assistance is managed by or through the local and central governments. Kenya is seen as a setting ripe for humanitarian and development agencies to work with the private sector—particularly in banking and telecommunications.⁷⁹ One regional representative stated that a large proportion of aid comes from private foundations and that the majority insist on working directly with Kenyan NGOs. Furthermore, there is a global health fund that is led by the UN and some American INGOs but managed by the Kenyan

71 Interviews with representatives of three LNGOs, Somalia/Somaliland, February 2019.

72 Interview with UN representative, February 2019.

73 Willitts-King et al., "Funding to Local Humanitarian Actors"; Nisar Majid et al., "Funding to Local Humanitarian Actors: Somalia Case Study," Working Paper (Humanitarian Policy Group at ODI, October 2018).

74 Majid et al., "Funding to Local Humanitarian Actors," viii.

75 Majid et al., "Funding to Local Humanitarian Actors," viii.

76 Willitts-King et al., "Funding to Local Humanitarian Actors," 6.

77 Willitts-King et al., "Funding to Local Humanitarian Actors," and for the full study, see Mo Ali et al., "Funding to Local Humanitarian Actors: South Sudan Case Study," Working Paper (Humanitarian Policy Group at ODI, October 2018).

78 Howe and Stites, "Partners under Pressure."

79 Jim Drummond and Nicholas Crawford, "Humanitarian Crises, Emergency Preparedness and Response: The Role of Business and the Private Sector. Kenya Case Study" (Humanitarian Policy Group at ODI, 2014).

Red Cross.⁸⁰ Interviews with INGO representatives revealed that the localization agenda was not a pressing concern. From their perspective, the strength of the government—both in its ability to respond to humanitarian emergencies and manage development responses—precludes the need to push for localization.

Despite this generally positive view, a study conducted by the localization sub-working group within the INGO Country Development Forum produced some contrasting results about how INGOs (n = 28) engage in their partnerships with LNGOs.⁸¹ Nearly three-quarters of INGOs in the sample do not publish the value of the funding that they provide to LNGOs. In terms of overall support, 18% extend minimal or no funding to LNGOs (0-5%), while 14% provide all of their funding to LNGOs. The majority (36%) provide between 6 and 33% of their funding to LNGOs, and the remaining 32% provide 34-90% of their funds to LNGOs. Of the funds that go to LNGOs, the majority (79%) stated that less than a third goes to supporting capacity development of LNGOs (40% reported they provided either no funding or a very small percentage).

The global discourse around localization and the Grand Bargain commitments has created its own interesting momentum—a part of which could be counterproductive to meaningful change. There is confusion about what was really meant by “as local as possible and international as necessary” and a commitment to providing 25% of humanitarian funding to local organizations. For some interviewees involved in advocacy, a lack of definitional clarity on these themes has created so many divisions within the humanitarian community that people are literally “stuck in rhetoric.” The role of financing was described as the most polarizing topic according to this network representative: “The conversation becomes, ‘internationals have money, local’s don’t. Internationals only see risk.’ And then

the conversation tends to stop.”⁸² An additional perspective from a global network representative adds that the 25% commitment “is being turned into a social justice issue. Because the international community has fallen short, local organizations believe these are hollow promises, but we never even knew what was really meant by 25%. Also, as local as possible...should this be the case in all settings? What about the role of national governments?” His perspective, which may be unpopular with parties closer to the ground, is to focus on individual settings and what is needed for each setting rather focusing on global blanket statements. For him, we should be focused on context of “What is the best response for x crisis? What tools (local and international) do we have at our disposal to respond?”⁸³

Competition for funds: Whether a by-product of the push for localization or simply the nature of protracted conflict, there was a clear perception, particularly in Somalia/Somaliland, that INGOs were in direct competition with LNGOs for funding. Nine representatives from all LNGOs in the sample perceived that competition with INGOs was a problem for their organizations, because INGOs were being awarded grants for work LNGOs could have done, had the playing field been fair. They found that INGOs, at times, continue to partake in direct implementation, even in locations where LNGOs are well capacitated and have a long history of operations. Interviews with representatives of the UN confirmed that LNGOs and INGOs compete for some of the same grants mechanisms, despite differences in capacity and resources for being selected for grants. Interestingly, representatives of LNGOs, some INGOs, and UN bodies saw this as unfair given the INGO’s comparative advantage in having resources for proposal development and capacity strengthening. In the words of one NGO representative, “International organizations can be seen as a big fish that eats all the food and leaves little to the little fish,” while another stated frankly

80 Interview with representative of regional humanitarian network, February 2019.

81 Permission was granted to replicate these results.

82 Interview with representative of national humanitarian network, Somalia/Somaliland, February 2019.

83 Interview with representative of global humanitarian network, February 2019.

that “INGOs shouldn’t implement what LNGOs can do.”⁸⁴

While empirical data on rates of INGO self-implementation in Somalia/Somaliland over time were not readily available, it is significant to note that the widespread perception was that this practice is increasing. One explanation relates to the fact that some funding platforms are seeking to ensure local actors can access funds. New funding mechanisms that expand the space for local and international organizations will inevitably increase competition between the two types of bodies. Another explanation may be in part related to the restructuring of Somalia and Somaliland Development Fund—which previously was implemented with LNGOs but has now shifted to local authorities. Competition between LNGOs may have also led to a saturation in the market and to the closing of some. An overreliance of LNGOs on project funds, coupled with the absence of unrestricted or core funds, was regularly cited as a factor leading to the unsustainability of LNGOs in Somalia/Somaliland.

Alternative funding mechanisms: existing and imagined

In Somalia/Somaliland, where advocacy runs strong, a few alternative funding schemes are being proposed and tested. The Somalia/Somaliland Humanitarian Fund (SHF), managed by OCHA, is a pooled funding mechanism that is meant to support “urgent life-saving interventions” in Somalia/Somaliland. In 2019, the priorities outlined by OCHA are “to focus on famine prevention response, support for NGOs, particularly local partners, and the

promotion of integrated response.”⁸⁵ While this fund is available to international and national NGOs, they are “striving to channel at least 40% of available funding directly through national partners (if, when and where feasible).”⁸⁶ In 2018, the SHF provided 45% of funds to national NGOs.⁸⁷ At the same time, however, the national average (of all funds) that ran directly to LNGOs or through one intermediary was only 13%.⁸⁸ While the SHF presents a clear opportunity for local organizations to write proposals for funds, there are a few weaknesses, including placing local and international organizations in direct competition with one another, and the lack of capacity strengthening as a part of the process. As described by this regional advocate, “There is no graduation process. Meaning that even when a local organization meets due diligence, they still don’t get to have a direct relationship with donors.”⁸⁹ Instead, what was proposed is a set of national-level funds that is led and managed by local partners. There would be a board that includes LNGOs as well as international organizations.

A similar pooled fund exists in South Sudan. The South Sudan Humanitarian Fund was established in 2012 to “support the timely allocation and disbursement of donor resources to address the most urgent humanitarian needs and assist the most vulnerable people in South Sudan.”⁹⁰ International and national NGOs are eligible to receive funds, as are UN agencies. For this particular fund in 2018, 39% was allocated to national NGOs, a rate much higher than the national average, a trend that was also seen in Somalia.

After the government of Kenya declared an emergency in February 2017 in response to a severe drought, the UN created a Central Emergency Response Fund (CERF) for Kenya. CERF funds were

84 Interviews with representatives of two LNGOs, February 2019.

85 OCHA, “Somalia Humanitarian Fund Annual Report 2018,” 2018, <https://www.unocha.org/sites/unocha/files/Somalia%20HF%20Annual%20report%202018.pdf>.

86 For more on the Somalia Humanitarian Fund, see <https://www.unocha.org/Somalia/Somaliland/shf>.

87 OCHA, “Somalia Humanitarian Fund Annual Report 2018.”

88 Majid et al., “Funding to Local Humanitarian Actors.”

89 Interview with representative of regional humanitarian network, Nairobi, February 2019.

90 OCHA, “South Sudan Humanitarian Fund 2018,” 2018, 12, https://www.unocha.org/sites/unocha/files/South%20Sudan%20HF%20Annual%20Report%202018_1.pdf.

used to support coordination among partners, both at national and county level. Prior to this crisis, the humanitarian coordination system was mostly dormant, as development actors were largely coordinated through line ministries. The CERF funding contributed to the resumption of a humanitarian sector coordination mechanism and the Kenya Humanitarian Partnership Team (KHPT), which involved local, national, and international bodies. In terms of funding, nearly 75% was channeled through the UN and International Organization for Migration (IOM), 2.2% went to the government, and the remainder went to NGOs and the Red Crescent Society (note: there was no distinction made between INGOs and LNGOs in the report on the use of CERF funds).⁹¹ The tendency for the humanitarian system to fund international agencies over non-governmental and governmental bodies is replicated with this example, and suggests that localization in Kenya may be further advanced only in terms of development systems and not in terms of humanitarian responses.

⁹¹ Chatterjee, Siddharth, "Resident/Humanitarian Coordinator Report on the Use of CERF Funds Kenya Rapid Response Drought 2017" (UN CERF, 2017), https://cerf.un.org/sites/default/files/resources/17-RR-KEN-25022-NR01_Kenya_RCHC.Report.pdf.

D. Recommendations

The following recommendations arise from this study's findings, which are based primarily on the perceptions and experiences of LNGO staff and are complemented with views from members of international organizations and existing literature.

For donors:

- Ensure that partnership agreements support the capacity of local and national actors;
- Consider a type of "affirmative action" for LNGOs over INGOs when competing for the same grants;
- Increase access to unrestricted funds for LNGOs. Consider a minimum percentage for overhead costs;
- Require that INGOs and LNGOs share unrestricted funds in a way that is equal;
- Establish funds that support only LNGOs;
- Engage with LNGO networks and forge relationships with individual LNGOs;
- Consider increasing flexibility in funding and lengthening funding cycles;
- Consider costs as a central tenet for grants awards;
- Prioritize emergency preparedness activities for LNGOs;
- Push the global discussion on risk and increase comfort with risk taking;
- Develop country-based pooled funds accessible for local and national actors that includes capacity-strengthening elements;
- Consider supporting the creation of national localization plans;
- Allow funding for programs that work across sectors and holistically;
- Consider lessons learned from the localization of development responses in Kenya and seek to integrate these into humanitarian systems.

For international organizations (UN and INGOs):

- Endorse the principle "if local responders can do it, we don't need to" and reaffirm commitment to working with LNGOs in a complementary way;
- Measure success beyond financial and portfolio targets;

- Allow local responders to be grant holders and to contract INGOs for technical expertise;
- Invest in building trusting relationships with LNGOs. Highlight LNGO partner work with donors and other stakeholders;
- Address risk with partners, and support their risk mitigation systems and contingency plans. Do not shift risk to partners;
- Increase access to funding for more advanced forms of MEAL in inaccessible areas in order to strengthen INGO-LNGO trust;
- Increase access to unrestricted funds for LNGOs and share unrestricted funds in a way that is equal;
- Establish funding mechanisms only accessible to LNGOs;
- Support capacity building of LNGOs that is tailored, and focused on both upward and downward accountability mechanisms;
- Consider capacity-strengthening activities that allow for LNGOs to "graduate" and facilitate direct connections to donors;
- Allow LNGOs to design their own programs and projects based on need. Be aware of steering partners toward donor priorities;
- *Specifically for the UN:* Consider favoring LNGOs over INGOs when they are competing for the same grants.

For LNGOs:

- Engage in networks that can facilitate advocacy and donor engagement;
- Include funds for institutional capacity strengthening as a standard in all projects;
- Engage in clusters and other coordination mechanisms;
- Engage in project development when partnering with INGOs;
- Bring international partners into a discussion on risk and difficulties faced in providing a principled response.

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