Localization:
A "Landscape" Report

Final Report to USAID, Bureau of Humanitarian Assistance

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Contents

Acknowledgements and Language

A Brief Note on Language

The language used to discuss localization is contentious. Even the basic vocabulary used to discuss localization is debated in the literature, including the word "localization" itself and the term "local humanitarian actor." Words used to discuss identity and the power dynamics of the localization agenda (such as "local," "international," "Global North," and "Global South") are imperfect; they contain assumptions that do not always reflect the complexities involved in identity and geopolitics, but they tend to be used widely in the literature. Some of these words will be unpacked and discussed in this paper, and some will not. Where there is debate about which words to use, we have selected the language that, in our view, best reflects the terminology used in the latest literature and the broader policy discourse. The authors remain open to suggestions and input from colleagues.

Acronyms

A4EP Alliance for Empowered Aid Partnership

ALNAP Active Learning Network for Accountability and Performance

ASEAN Association of Southeast Asian Nations

BHA Bureau for Humanitarian Assistance

C4C Charter for Change

CAP Consolidated Appeals Process

CARICOM Caribbean Community

CBPF Country-based pooled fund

CERF Central Emergency Response Fund

CHF Common Humanitarian Fund

CHS Core Humanitarian Standard

EU European Union

FTS Financial Tracking System

HRP Humanitarian Response Plan

IHA International humanitarian actor

INGO International non-governmental organization

LHA Local humanitarian actor

NEAR Network for Empowered Aid Response

NGO non-governmental organization

OCHA Office for the Coordination of Humanitarian Affairs

ODI Overseas Development Institute

OECD Organization for Economic Cooperation and Development

PIANGO Pacific Island Association of NGOs

SCLR Survivor and community-led response

UK United Kingdom

UN United Nations

US United States

USAID United States Agency for International Development

WFP World Food Programme

WHS World Humanitarian Summit

Executive Summary

The humanitarian sector has faced an overwhelming series of challenges in the twenty-first century. While the nature of these crises has shifted, and the number of people in need has grown, the sector has not managed to keep up with these changes. More and more people affected by conflict and disaster are unreached or underserved by the humanitarian sector. It has also become clear that, in a crisis, affected populations rely on many sources beyond the formal humanitarian system for assistance. Formal humanitarian assistance has long been primarily perceived as the work of international actors, such as the United Nations (UN), the International Red Cross and Red Crescent Movement, and international NGOs (INGOs). Despite their significant contributions, the work of more local (and perhaps less formally structured) groups has been minimized. In fact, for decades, many international humanitarian assistance structures—such as funding, coordination, and decision-making mechanisms—have excluded or marginalized local humanitarian actors. "Localization" is a loosely defined agenda meant to work to correct that exclusion.

Localization gained increasing prominence in the years leading up to the 2016 World Humanitarian Summit (WHS) in Istanbul, Turkey. There, localization became a formal part of the mainstream humanitarian reform agenda through its inclusion in the Grand Bargain (the primary agreement to come out of the WHS). As laid out in the Grand Bargain, the localization agenda is focused on increasing local actors' access to international humanitarian funding, partnerships, coordination spaces, and capacity building. Recently, there has also been increased attention to local leadership and influence in policy spaces. In addition, the COVID-19 pandemic and the global reckoning with systemic racism following the murder of George Floyd in the United States have shone a spotlight on the importance of the localization agenda in terms of making the system both more effective and more equitable.

There are a variety of definitions of localization and a lack of consensus about what the term means in practice. Indeed, many actors do not like the term "localization" at all as some believe it implies that

aid is not already local. There is a spectrum of views on whether localization should be about making existing international systems more inclusive of local actors, or whether it requires a fundamental transformation of the system to adapt to diverse local realities. These divergent views are also reflected in different perspectives about whether the localization process is primarily a pragmatic effort to fix an ailing system or is an ethically inspired agenda to make the system more equitable. Both perspectives have some impact on the way localization reforms are carried out, particularly in places with tight restrictions on civil society. The lack of consensus on the meaning of localization makes it challenging to operationalize the localization agenda and hold certain groups accountable. To some extent, however, both the definition of localization and its operationalization are context-specific; there may be, therefore, a limit to ongoing semantic discussions.

For this report, it is useful to clarify the term "local humanitarian actor." The meaning of "local" is relative; it goes beyond the simple binary relationship of "international" vs. "local," that is used in much of the current literature. In addition, local actors do not necessarily identify themselves as "humanitarian," even if they are involved in a response to a shock or emergency. Much of the discussion around localization presumes that local actors are part of local government or formally organized NGOs, but a wide range of local actors exist beyond these two categories. Recognizing, understanding, and engaging intentionally with a diverse set of actors is important for an equitable approach to localization.

The main operational issues related to the localization discourse include funding, partnerships, coordination, capacity, and leadership. Despite the Grand Bargain commitments on most of these issues, progress has been limited. Local actors still only directly receive about 3% of tracked international humanitarian funds (not including sub-grants and sub-contracts), which is far short of the Grand Bargain goal of 25%. Partnerships between international and local actors still tend to be structured through a subcontracting model, in which local actors have limited agency and low-quality funds (meaning funds that

do not cover core costs, are short-term, may arrive late, etc.). Coordination structures frequently remain only partially accessible to local actors. The discourse on capacity tends to prioritize administrative and compliance skills associated with large international organizations, and capacity building tends to be one-way and based on short-term trainings. While there is a greater recognition of local leadership in several forums and responses, many believe that COVID-19 was a missed opportunity to embrace local humanitarian leadership more fully.

The fact that the humanitarian system is still struggling with some of the core localization commitments from five years ago can be attributed to a number of barriers. For example, much of the international humanitarian infrastructure—including funding, coordination, and partnership mechanisms—has not changed in a meaningful way over the past five years: there are still underlying power dynamics, and an overall climate of risk aversion, that disincentivize significant reform. A lack of leadership and accountability from key global actors, as well as numerous barriers within specific crisis contexts, also present barriers to real change.

However, the study also identifies several enabling factors for the localization agenda. Local humanitarian actors themselves have worked to push the agenda forward through advocacy and collective organization, and some international actors have played a leadership role in advancing the localization agenda at the country and global levels. Although many pieces of the humanitarian system remain unchanged, progress is being made in certain contexts toward more inclusive and locally-led funding and coordination mechanisms. Recent global issues, such as the COVID-19 pandemic and the broader discourse on racial equity—combined with increasing restrictions on humanitarian access in many crises—are all pushing the localization agenda in new directions.

Some factors remain highly context-specific in terms of their effect on localization. For example, the role of the affected state is controversial and variable. Sometimes the state is seen as a significant enabler of localization, but in other situations, particularly conflict-related crises, it is considered a barrier. The roles and actions of INGOs are also highly variable. One growing trend is the "nationalization" of INGOs. Some observers view this trend as a

positive step toward decentralization and accountability, but others see it as an infringement on the already-limited space for unaffiliated local actors. Finally, a common perception is that, because they are embedded in a specific local cultural and institutional context, local actors are less able to adhere to humanitarian principles. Although there are some examples to support this view, there are many to refute it. It is a broad generalization without strong evidence behind it.

Localization, by its very essence, is a context-specific endeavor, and localization practice and policy need to be driven by research in, engagement with, and accountability to actors and affected populations in that context. The localization agenda also overlaps with other key policy agendas in the humanitarian sector, particularly the "triple nexus" agenda of humanitarian aid, development, and peacebuilding. By definition, local actors are engaged in local action, which is often broader than just a humanitarian response. Ongoing localization research needs to engage a more diverse and representative set of researchers and work to minimize barriers to knowledge sharing.

The report concludes with several recommendations. While written specifically for large international donors that play a critical role in supporting localization, they are broadly applicable to other humanitarian actors as well. They include the following:

1. Take a "do no harm" approach to all programs and policy changes, recognizing that all policy changes can have unintended consequences, and ensure they are contextually appropriate.

2. Reform direct funding systems in ways that make funding more accessible to a more diverse set of local humanitarian actors.

3. Help create an "enabling environment" for localization by investing in key structures and services at the country level.

4. Build relationships (that go beyond funding) with diverse local actors through intentional and sustained engagement.

5. Analyze and address internal bureaucratic and capacity issues.

6. Enhance opportunities for local leadership.

7. Move towards greater coordination and collaborations with other donors.

1. Background and Methodology

1a. Brief Introduction

The humanitarian sector has faced an overwhelming series of challenges in the twenty-first century. The nature of crises has shifted; armed conflict is now the dominant cause of humanitarian emergencies, and communities face increasing risks from climate change and other natural, market, and public health hazards. The number of people in need has grown more than sixfold over the past fifteen years; however, while the humanitarian budgets and staff sizes of formally organized humanitarian actors have also grown rapidly, they have not grown fast enough to keep up with the number of people in need. As a result of this growing disparity, more and more people affected by conflict and disaster are unreached or underserved by the humanitarian sector (Urquhart et al., 2021).

However, it is also clear that affected populations rely on many sources outside the formal humanitarian system for assistance during a crisis. One recent report suggests that as little as 1% of all assistance to conflict and disaster-affected people may come from the formal humanitarian system (Willitts-King et al., 2019). Although this figure likely underestimates the contribution of the formal sector in most cases, it highlights the significant role actors outside the formal humanitarian system play, particularly those from or connected to an affected area. Regardless of the very significant contribution these groups outside the formal sector make, formal humanitarian assistance has long been perceived as the work of primarily international actors, such as the United Nations (UN), the Red Cross and Red Crescent movement, and international NGOs (INGOs). There are critiques going back decades of this formal humanitarian sector focus on international actors. Many observers suggest that one way to "fix" the formal system is to engage much more effectively with local actors (e.g., Cohen and Gingerich, 2015).

A term has emerged to name this potential fix for the humanitarian system: **the "localization" of humanitarian assistance.** Localization gained increasing prominence on the international humanitarian agenda in the years leading up to the 2016 World Humanitarian Summit in Istanbul, where it formally became part of the mainstream humanitarian reform agenda through its inclusion in the Grand Bargain.[1]

At the time, although there were clear elements of equity and accountability expressed in the Grand Bargain, localization was still largely framed as a pragmatic "fix" to the system. Progress toward implementing even the relatively modest Grand Bargain reform commitments has been limited; in the time since the WHS several events during the 2020-2021 period have recast the entire localization landscape. For example, because of the COVID-19 pandemic in 2020, many international staff and organizations could not travel to affected areas, proving the essential nature of local frontline organizations and opening space for them to demonstrate their leadership. In addition, the global reckoning with systemic racism, following the 2020 murder of George Floyd in the United States, opened more space for discussing the ethical imperatives for localization, framing it as a way not just to make the system more effective, but also to make it more equitable.

This report was commissioned by the USAID Bureau of Humanitarian Assistance (BHA); it aims to establish the current landscape of issues and perspectives associated with localization in the humanitarian sector as of this writing. In brief, localization remains an evolving concept with an ever-changing set of agendas. The first section of this report provides definitions. The second section reviews the policy commitments made in the Grand Bargain and demonstrates how today policy imperatives have moved beyond the Grand Bargain. At its core, this report contains an analysis of the factors that enable and

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[1] The Grand Bargain was a series of international commitments that emerged from the 2016 World Humanitarian Summit

hinder global efforts to promote localization, while recognizing that many issues are context specific. The report closes with key recommendations based on the findings. These recommendations are formulated specifically for international donors but may apply to many other actors as well.

1b. Study Methodology

This study relied on two main data sources: 1) an extensive review of the literature on localization and several related topics and 2) a series of interviews with key stakeholders in different parts of the world, representing a range of institutional and regional perspectives. Of the latter, there was a focus on conducting sets of interviews with global key informant as well as among diverse actors within a select number of crisis contexts. These "deep dives" contributed to the overall analysis, and they may also be presented as stand-alone summaries to accompany this report.

Review of the Existing Literature and Documentation: The literature review consisted of English-language peer-reviewed articles, agency reports, evaluations of Grand Bargain commitments, and other articles and "grey literature." Specific areas of focus for the literature review included local ownership and leadership, localization and aid effectiveness, international-local organizational dynamics, donor engagement, the private sector, social connectedness

and support groups, diaspora, marginalized groups, women's organizations, faith-based organizations, other community-based groups, humanitarian principles, and localization and COVID-19. The literature review helped shape not only the report itself but also the lines of inquiry for the key informant interviews.

Key Informant Interviews: The interviews conducted are outlined in Table 1. In total, 59 interviews involving 68 individuals were conducted between April and November 2021. Interviewers used a "snowball" sampling strategy: key informants were asked to suggest additional individuals to interview and additional documentation to review. This snowball approach was initiated from several different starting points to ensure a broad cross section of respondents.

Given that much of localization is context-specific, the interview process attempted to balance breadth of perspective from different stakeholders and countries with some depth. To accomplish the latter, the study organized "deep dives" in Honduras and Haiti— backed up by other recent case studies that the Feinstein International Center has conducted under other research projects.[2] Insights from these in-depth studies were incorporated into the global study, and data from some of the country-specific explorations will be developed into stand-alone case studies that accompany this report.

Interview transcripts were analyzed using NVivo (V.12.6.1).

	Overall Total		Research/ Policy Advocacy		International NGO/UN		Local/national NGO or government		Donor Agencies	
	Interviews	People	Interviews	People	Interviews	People	Interviews	People	Interviews	People
Total	59	68	17	19	11	13	23	26	8	10

Table 1. Interviews and Key Informants by Category

Note: In this report, interview numbers are used to describe the views of key informant.
No key informants are identified by name, organization, or position.

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[2] These included Colombia, Iraq, and Haiti (Robillard et al., 2020) and Sulawesi, Kenya, Somalia and South Sudan (Howe et al., 2019).

1c. Limitations

Specificity and Generalizability: By its very nature, **the discourse around localization both requires and defies a global analysis.** The systems that affect localization dynamics are global in nature, including global geopolitics and the structures of international aid. However, the perspectives, priorities, and very real circumstances of crisis-affected populations vary significantly around the world, and even within crisis-affected populations. It would be impossible to obtain a representative sample of voices on localization. However, it must be acknowledged that the purposeful methodology used, including the snowball sampling, introduces its own form of bias to this study, orienting it toward contexts and actors with connections to the Feinstein International Center.

This study relied on a review of the literature and key informant interviews. The team deliberately tried to interview key informants with diverse perspectives, but there are nevertheless limits to the generalizability of the study. Indeed, one of the report's major findings is that localization is very context specific.

Language Bias: While many interviews for the country-specific case studies were conducted in languages other than English, English was still the dominant language of the interviews, and the study did not reach many potential key stakeholders because of language barriers. In addition, conversations with some key stakeholders were limited due to their comfort levels with English, perhaps limiting the depth of information obtained from stakeholders representing non-English-speaking populations. The literature review was also limited, consisting entirely of English-language literature, meaning that other forms of knowledge and learning expressed in other languages could not be considered for this study (unless otherwise cited and explained in the English-language literature).

Institutional Bias: This study was undertaken by an institution based in the Global North. When designing this study, the main study team consulted a range of actors across the humanitarian system, including some from crisis-affected countries, and the team members have experience working for local humanitarian organizations and living in varied contexts in the Global South. However, they do not view themselves as having the experience of local humanitarian actors. Thus, the nature of the main study team may have introduced certain biases to the research by framing it from a primarily Global North perspective.

COVID-19 Limitations: This study also experienced specific challenges in terms of execution. The study was designed before the COVID-19 pandemic hit the world and then had to adjust to the new realities the pandemic created. For example, nearly all interviews had to be conducted remotely via phone or Internet-based platforms, such as Zoom, which limited who could participate in the interviews and, possibly, the openness of the interviewees.

2. "Localization" Overview

Summary of key points:

- The "international humanitarian system" has generally excluded groups from countries experiencing humanitarian crises, known as "local actors."

- "Localization" is a loosely defined agenda meant to correct that exclusion.

- The localization agenda gained significant traction during the 2016 World Humanitarian Summit, particularly through Grand Bargain commitments.

- The localization agenda is generally framed as focusing on increasing local actors' access to international humanitarian funding, partnerships, coordination spaces, and capacity building.

2a. Background on the Localization Discourse

Humanitarian action may be as old as humanity itself, with diverse practices of mutual assistance and emergency relief practiced around the globe for millennia. The institutions and mechanisms currently recognized as the "international humanitarian system" have evolved more recently and have their roots in Western responses to the major wars and famines of the past century and a half. The United Nations (UN) system was created primarily in the aftermath of World War II. Much of the origin story of humanitarian action revolves around the founding of the Red Cross in the mid-nineteenth century. Many contemporary international NGOs (INGOs) were formed in response to specific populations caught in emergency situations in various disasters during the twentieth century. All these groups (the UN, the Red Cross, and a broad range of INGOs) have evolved into a highly formalized and professionalized system through which a limited number of donors (mostly member states of the Organization for Economic Cooperation and Development [OECD]) channel billions of dollars per year.

It is important to recognize that not all INGOs are part of this system and that other contemporary humanitarian systems have existed and do exist, such as efforts to construct a regional humanitarian system in post-colonial Africa in the 1960s (Boateng, 2021). Nonetheless, for the purposes of this paper, the "international humanitarian system" and the "formal humanitarian system" refer to the systems and mechanisms that today are largely funded by OECD donors and largely carried out by UN agencies, the Red Cross, and International NGOs.

This system is growing rapidly, with the UN Consolidated Appeals Process (CAP)/Humanitarian Response Plan (HRP) appeals increasing nearly five-fold from 2007 to 2019, and with funding requests growing at an even greater pace during the COVID-19 pandemic (Urquhart et al., 2021). Although the CAP/HRP represents only a portion of total humanitarian action and funding, it is the most visible and most easily tracked. From the perspective of funding flows, this formal system amounts to what some observers have called an "oligopoly." Prior to the 2016 World Humanitarian Summit, **the four largest UN agencies and the Red Cross accounted for two-thirds of the total budget of the formal humanitarian system.** Furthermore, while there are thousands of known humanitarian actors, in 2014, 13 UN agencies, 14 INGOs or NGO consortia, and the Red Cross accounted for nearly 90% of the total humanitarian budget. In the same year, direct assistance to affected country governments totaled less than 1% of the funding channeled through the international humanitarian system.

While this system has been responsible for saving many thousands of lives and channeling significant resources to emergency responses, **the international humanitarian system has also been criticized for the exclusion, instrumentalization, and undermining of local actors from crisis-affected countries.** Historically, less than 0.3% of formal system funding has gone directly to local humanitarian actors—including both government and civil society (Poole, 2018). Even at the time of the 2016 World Humanitarian Summit, only 0.4% of formally tracked global humanitarian funding went directly to local organizations (Lattimer & Swithern, 2016), although substantially more went to local organizations in the form of subcontracts. Funding from international actors is often passed through to local partners through subcontracts; however, these contracts tend to be structured in a way that offers local partners little decision-making power, agency, or even allowances for core costs (Els and Carstensen, 2016; Poole, 2014), even as they take on a greater share of the security and reputational risks involved in a humanitarian response (D'Arcy, 2019; Howe and Stites, 2019). In addition, local actors are frequently excluded from international humanitarian coordination mechanisms due to physical access, language, and resource barriers (de Geoffroy and Grunewald, 2017). According to after-action reviews and formal evaluations of major responses, these exclusionary practices have frequently led to worse humanitarian outcomes for affected populations (Haver, 2011; Scheper et al., 2006).

Calls for reforming this approach—from actors based in both the Global North and the Global South—are not new. The development sector has long recognized the importance of local organizations in rural development and poverty reduction (e.g., Esman and Uphoff, 1984) and through instruments such as the Paris Declaration of 2005, the Accra Agenda for Action of 2008, and the Busan Aid Effectiveness Forum of 2011 (OECD, 2011). And calls for empowering local actors in the humanitarian sector are not new either. In 1993, southern Sudanese NGOs issued the Nairobi Joint Statement, which called for channeling more funds through local NGOs (Omaar and de Waal, 1995). In

1994, the Red Cross Red Crescent/NGO Code of Conduct called for, among other things, building "disaster response on local capacities" (International Federation of Red Cross and Red Crescent Societies, 1994). Writing in 2015, Cohen and Gingerich noted that the formal system at the time was "in crisis"—overstretched and incapable of managing the emergencies it was designed to handle. They called for "turning the system on its head" through a major restructuring of the formal system that would empower local actors to play a much greater role.

Recent commitments to increased local leadership of humanitarian actions include several UN resolutions; the Principles of Partnership; the Charter for Change (C4C); the Core Humanitarian Standard (CHS); and the Good Humanitarian Donorship principles (Wall and Hedlund, 2016). Over the last few decades, local humanitarian actors and organizations based in the Global South have been increasingly raising their voices to critique the inequities and inefficiencies of the current international humanitarian system, with organizations such as Adeso and networks like NEAR [3] evolving as leading global advocates.

The commitments and concerns noted above gradually coalesced into a loose agenda for what came to be called the "localization" of humanitarian action. Localization was placed firmly on the agenda of the 2016 World Humanitarian Summit (WHS) and was a key feature of the resulting Grand Bargain commitments. These commitments included a "localization workstream" that consists of six commitments to action grouped into four main areas of reform: 1) increasing **direct funding** to local humanitarian organizations; 2) investing in the **institutional capacity** of local humanitarian actors; 3) forming more equitable **partnerships;** and 4) ensuring that **coordination** platforms are inclusive of local humanitarian actors. These four areas have shaped the post-WHS mainstream agenda on localization. Recent global phenomenon, such as the COVID-19 pandemic and increasing institutional reckoning with systemic racism, have expanded that focus, as has ongoing research and practice (which is further discussed below).

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[3] Adeso began as a Somali NGO (then called Horn Relief) that now operates in several East African countries. NEAR is the Network for an Empowered Aid Response, a consortium of organizations from the Global South dedicated to local participation in development and disaster management.

2b. Definitions of "Localization"

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Summary of key points:

- There are different definitions of localization and a lack of consensus on what it means in practice.

- Many actors do not like the term localization, or the term has little to no meaning for them.

- This lack of consensus presents challenges for operationalizing the agenda and holding certain groups accountable.

- Some actors believe localization should have different definitions depending on the context and that discussion about localization should not get lost in semantics.

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The term "localization" has always been ill-defined, serving as an umbrella term for nearly any kind of humanitarian reform involving local actors (Wall and Hedlund, 2016). Several definitions have emerged from different forums, organizations, and research efforts. The following definitions are frequently referenced:

- *The Grand Bargain*: "Making principled humanitarian action as local as possible and as international as necessary" (WHS Secretariat, 2016).

- *The Organization for Economic Cooperation and Development (OECD):* "A process of recognizing, respecting and strengthening the leadership by local authorities and the capacity of local civil society in humanitarian action, in order to better address the needs of affected populations and to prepare national actors for future humanitarian responses" (Cyprien Fabre and Manu Gupta, 2017).

- *Trocaire:* "Aid localization is a collective process involving different stakeholders that aims to return local actors, whether civil society organizations or local public institutions, to the center of the humanitarian system with a greater role in humanitarian response" (de Geoffroy and Grunewald, 2017).

- *Pacific Island Association of NGOs (PIANGO) and the Australian Red Cross:* "A process of recognizing, respecting and strengthening the independence of leadership and decision making by national actors in humanitarian action, in order to better address the needs of affected populations" (Australian Red Cross, 2017).

Despite the evolving nature of how localization is understood, and the significant increase in research on localization since the Grand Bargain, **there is still a lack of consensus about what localization actually means in practice** (Barbelet et al., 2021). According to key informants in this study, there can be different views of localization even within the same INGO; for example, some see localization as a fundamental shift in humanitarian infrastructure while others see it as a call to establish local branches of the INGO (Interviews 16, 27). Other key informants in this study—primarily policy researchers and donors—affirmed that there is a lack of definitional clarity, **which makes it challenging to operationalize, measure, and therefore assess progress on localization** (Interviews 1, 2, 3, 4, 11, 27, 31, 32, 36). This in turn helps maintain the status quo, as different actors can effectively use the term to justify what they are already doing or are comfortable doing (Interviews 1, 2, 3).

> "The very term localization is a neocolonial term because localization is drawn from the perspective of outsiders about locals, and how paternalistically we can help them to become the main drivers and local actors. So, localization itself just is a bad term."
>
> — Retired career UN official

At the same time, there has also been **increasing frustration with the term "localization"** over the past five years, with many actors seeing the term as paternalistic, neocolonial, and even offensive (Interviews 1, 2, 6, 7, 8, 14, 19, 20, 30). Several key informants have stopped using the term altogether when possible, preferring terms like **decolonization of aid, decentralization of aid, community-centered aid, accompaniment, local solutions, local sovereignty, and local humanitarian leadership.**

It is worth noting that, for local and national actors in many parts of the world, **the word "localization" has no meaning at all**. Research in Honduras for this paper found that many local actors had no concept of the word localization (which, in Spanish, more literally translates as "to locate" something), and many local actors in Haiti were similarly unaware of the word or the associated agendas (Interview 39, 43, 56, 57, 58, 59). Many other actors around the world are unaware of the localization agenda and its related commitments, including the Grand Bargain (Van Brabant and Patel, 2018).

"The discussion has gotten stuck on how people should define it, and people have gotten stuck on whether it's values or moral or ethical or this technocratic bit…It's all of those things."

— Policy researcher based in the Global North

Others believe that it is normal for there to be multiple definitions as the concept is relatively new, and there exist, in practice, a spectrum of meanings (Interview 29). Indeed, an increasing number of researchers believe that the focus on the definition of localization has itself become counter-productive

(Barbelet et al., 2021). In this respect, there have been increasing calls for localization **to be defined by local actors in local languages at a context-specific level** (Interviews 11, 14). Examples include work in the Pacific by the Pacific Islands Association of Non-governmental Organizations (PIANGO) and the Humanitarian Advisory Group (Flint et al., 2018), and debates in local coordination networks in Yemen regarding the correct translation of the term localization into Arabic (author discussion with Yemeni researchers, 2021). This shift in emphasis to context-specific definitions, dimensions, and indicators has been affirmed as a recent trend in the literature as well (Barbelet et al., 2021).

2c. Defining "Local Actors"

Summary of key points:

- The term "local" is relative and goes beyond a simple binary definition of international/ local.

- Not all local groups responding to a crisis identify themselves as "humanitarian."

- In practice, the use of the word "actor" tends to prioritize governments and formal NGOs in the affected country; this may exclude other kinds of groups (particularly informal ones) that may be more representative of marginalized populations.

Previous sections of this report have discussed the concept of localization and referenced "local humanitarian actors," but that term also requires definition and significant discussion. This section breaks down and briefly examines the component terms "local," "humanitarian," and "actor."

"Local"

The term "local" is often used simply in opposition to "international" to designate any group based in the crisis-affected country. However, **this binary definition homogenizes groups across significant geographic, political, ethnic, linguistic, class, or other divides** within the crisis-affected country. Some observers distinguish between "local" organizations that operate within a defined area of an affected country, and "national" organizations that operate across most of the country (Cohen and Gingerich, 2015). Others define "local" as being from the crisis-affected population. However, the term "local" is relative, and, depending on existing social and geographic divides, a group operating in the same province or region as a crisis-affected community may still be perceived as an outsider.

At the other geographic extreme is the question of diasporas. Diasporas may be physically distant from an affected area, but their social or familial proximity to the affected communities may mean that

The Relativity of "Local:" Cite Soleil, Haiti

The wealthy municipality of Petionville and the marginalized municipality of Cite Soleil are both part of the Port au Prince metropolitan area in Haiti. However, many people in Cite Soleil would not consider an organization from Petionville to be local. Even within Cite Soleil, due to the geographic divisions created by chronic gang conflict, a group across the street may not be considered local.

– Member LNGO in Haiti

they may be more trusted and effective responders than groups physically located in the same country or region as the affected community, but who lack any social ties to the affected communities. In short, "local" is a relative concept that is fundamentally associated with different forms of proximity to the affected population, which include the following:

> [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 as the affected people") (Maxwell, p. 3, 2019).

This relative understanding was reinforced by key informant interviews who see "local" as encompassing diverse groups that do not necessarily correlate to a specific geographic identity (Interviews 7, 29, 33). **Some of these definitions hinge more on identity**, **relationships, and accountability.** The NEAR Network, for example, defines a local actor as one who is "present in locations before, during, and after a crisis; accountable to local laws; accountable to communities where they work; led by local nationals, and not internationally affiliated in terms of branding, governance, or financing (that results from affiliation)" (NEAR, 2017). Other studies have found varied understandings of "local" in different countries, including some definitions that rely on the ability to leverage local leadership and capacity (Robillard et al., 2020).

"Humanitarian"

The term "humanitarian" implies a certain kind of values or at a minimum a certain kind of action—usually a person or group involved in protecting human life and dignity or preventing human suffering in times of a crisis or emergency. An organization or group rooted in a specific community or geographic area is more likely to have multiple mandates—for example, development, human rights, education, etc.—that depend on the situation in their area of interest and operation. They may pivot to respond to an acute emergency when one emerges and resumes their non-humanitarian activities when the crisis winds down. This ability to engage across the "nexus" is one advantage of local actors, but **it makes the "humanitarian" label at times ill-fitting—and many of these actors do not necessarily self-identify as humanitarian**, even when they may be leading or participating in frontline responses to emergencies (Robillard et al., 2020). Given the chronic and cyclical nature of crises in many societies, what outsiders may identify as an "emergency" may be seen differently by actors who have had to navigate repetitions of these crises over the course of years or decades. By referencing only local humanitarian actors, the agenda may be excluding a diverse array of local groups that do not self-identify as humanitarian.

"Actor"

In practice, the word "**actor**" generally refers to recognized governments and formally organized NGOs. (Most of the localization literature typically refers to the latter.) However, this view overlooks the vast and diverse set of actors that play an important role in humanitarian crises, even if humanitarian response is not their core or exclusive purpose (see box to right). In addition, armed, non-state actors can play (and have played) an important role in the humanitarian response ecosystem (Omaar & de Waal, 1995; South et al., 2012; Wright, 2019).

This focus on governments and more formal NGOs arises largely because it is more challenging for the formalized and professionalized international humanitarian system to identify and work with groups that may have very different structures, values, and priorities. However, international actors

may end up neglecting, duplicating, or even undermining the humanitarian response efforts of these other groups because they are not recognized or valued. **International efforts may unintentionally marginalize some groups** (such as women, ethnic minorities, or sexual and gender minorities) that are more likely to organize themselves in ways that are not as visible to outsiders because they are informal or unlike typical NGOs in their structure (Jaspars et al., 2010; Lambert and Zaaroura, 2018; Lindley-Jones, 2018). One key respondent was hesitant to use the word "organization" in the localization discussion because of concerns it could exclude diaspora groups that may not have structured themselves as formal organizations (Interview 33).

"Local Actors" besides Local Government and Formal L/NNGOs (non-exhaustive list of examples)

- Grassroots groups, community-based organizations, and informal associations

- Cooperatives, livelihoods groups, professional associations, and trade unions

- Faith communities and religious institutions

- Private sector

- Journalists and media organizations

- Schools and universities

- Formal and informal health actors

- Traditional and customary authorities

- Spontaneous volunteer groups

- Individuals, social networks, and diasporas based on geography, identity, religion, politics, and mutual assistance

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Ultimately, distinguishing who is a "local humanitarian actor" may need to be determined in a way that is relative, on a spectrum, and context-specific (Barbelet et al., 2021). When policies are being made about localization, definitions about who qualifies as a local actor should be made as clear as possible.

2d. Inclusion versus Transformation

Summary of key points:

- Some view localization as a process of making the current international humanitarian system more inclusive of local actors.

- Others view localization as a process of transforming the international humanitarian system so it better adapts to local realities.

- Some in the latter camp believe that international aid must be "decolonized" to truly address the fundamental power imbalances in the system.

One of the central underlying tensions in discussions about localization is whether it is about better **inclusion of local actors in the international system as it currently exists** (finding a place for them in the current system) or about **fundamentally transforming the humanitarian system** so that it is better adapted to local actors and systems. One metaphor for understanding this distinction is whether localization is about opening the door of the "humanitarian clubhouse" to let more local actors inside, or whether it is about dismantling the clubhouse entirely to build something new.

> "Localization is the meaningful engagement of local actors in the whole project cycle, from agenda setting to implementation to accountability."
>
> — Researcher from a policy group in the Global South

The **inclusion perspective** resonates more closely with current international commitments that seek to make funding systems and coordination mechanisms more accessible to local actors; reduce administrative barriers in partnership and compliance agreements; and increase capacity building for local actors. These goals resonate with many local and national actors who experience real daily exclusion from international humanitarian mechanisms (Bar-

belet et al., 2021). Key informants from both international and local organizations discussed the particular importance of making funding and coordination systems more inclusive of local actors (Interviews 2, 8, 21, 23, 24, 25).

The primary concern with the inclusion agenda is that the international humanitarian community may essentially be forcing local actors to adapt to the current international humanitarian system and, therefore, its significant structural problems. This concern was expressed by Antonio Donini, who cautioned against the tendency toward "**isomorphism**," or attempts to reshape local actors in the image of international organizations (Donini, 2010). Indeed, capacity-building efforts related to localization have focused largely on equipping local actors with administrative skills so as to strengthen their "upwards" accountability to international NGOs and donors; however, some fear this focus could undermine their "downwards" accountability to affected populations, impede their attempts to build national humanitarian systems and funding sources, and replicate problematic power imbalances (Interviews 2, 10, 13).

> "Are we localizing international assistance, or are we internationalizing local actors?"
>
> — Researcher from an INGO based in the Global North

The **transformation perspective** asserts that, instead of local actors having to spend so much energy adapting to international systems, the international systems should adapt to them. This perspective calls for a more explicit focus on shifting the fundamental power dynamics and relationships underlying the localization discourse. Most of the policy researchers interviewed for this study, and even some donors and UN officials, share in this perspective (Interviews 8, 9, 10, 12, 13, 15, 19, 37). There is a lack of faith among some that inclusionary reforms will address the power issues that many view to be at the heart of localization efforts.

Still, the question remains: transform the system into what? The greatest consensus among key infor-

mants revolved around a system in which **international organizations would play an auxiliary, technical, service provider, and/or advocacy role upon the invitation** of local actors from the affected area (Interviews 2, 14, 15, 16, 20, 27, 29). This view is consistent with the latest literature on the potential role intermediaries should play in future humanitarian action, with calls for a refined, context-specific role that focuses on complementarity (Lees et al., 2021).

> "[Current localization efforts] are a technical fix to an ethical and political problem. And the technical fix is failing—the resources are not being redistributed. But the relationships fundamentally aren't changing."
>
> — Researcher/Consultant for an NGO based in the Global North

Other views mentioned shifts from current sector-based coordination to area-based coordination (Interview 17) and building up the base of local humanitarian philanthropy (Interview 37) as important elements of a transformed, locally led humanitarian system. Some key respondents for this study believe that localization should be more explicitly framed as **de-centering international actors** in a humanitarian response and/or **de-internationalizing** humanitarian aid (Interviews 10, 14, 19).

This transformation discourse is where the localization agenda most closely dovetails with the **decolonization agenda**,[4] which is related, but distinct. Particularly since the murder of George Floyd in the United States and the amplification of the Black Lives Matter discourse on a global level, aid workers and researchers have increasingly and explicitly called out the role that racism and neocolonialism play in the unequal power dynamics that affect not just the localization agenda, but the effectiveness of humanitarian aid as a whole (Cornish, 2019; Currion, 2020; DA Global, 2021; Peace Direct, 2020; Slim, 2020). Many interview respondents felt that current humanitarian response structures are too embedded in colonial or neocolonial power

systems to offer meaningful opportunity or agency to local actors; they therefore felt that engaging with some dimension of "decolonization" was critical for advancing the localization agenda (Interviews 1, 3, 6, 8, 9, 10, 12, 15, 30). It is worth noting that some actors outside the research and policy spaces discussed power imbalances between the Global North and the Global South without using the specific term "decolonization." One key respondent expressed concern about decolonization being a divisive and counterproductive term (Interview 34).

> "[It's a] journey to decolonization. I don't even talk about localization anymore."
>
> — INGO Director based in the Global South

To be sure, efforts around localization may have to straddle this spectrum of views between inclusion of local actors, which may be more viable in the short term, and transformation (and even decolonization) of the system, which may be more essential in the long term. As with most questions on localization, the way forward may ultimately be defined by the context, depending on what social, political, and geopolitical forces are at play in each country, and what alternative systems are either already in place or poised to take the place of the current system.

> "I think we have to transform the system, but in practical terms, I don't think we are going to tear things down and start from scratch. I think we need to make really huge changes, but we have to fix the plane as we're flying it."
>
> — INGO Researcher based in the Global North

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4 Discussions around "decolonization" are not unique to the localization agenda but rather are and have been included in a number of disciplines, fields, and domains.

2e. Ideological versus Utilitarian Motivations

Summary of key points:

- Some believe that localization should be carried out because it will make humanitarian aid more effective.

- Others believe that localization is an ethical issue and should be done because it is "the right thing to do."

- These views have some impact on how localization reforms are carried out in certain contexts, particularly in places facing civil society challenges.

Just as there is a spectrum of views between inclusion and transformation in the conversation about localization, there is also a spectrum of views surrounding the true motivation for localization. There are both ideological/normative and utilitarian/practical justifications for advocating for these shifts in humanitarian power structures.

There is little evidence that definitively compares the relative effectiveness of local and international actors, and even more limited evidence on questions of effectiveness that could be generalizable (Barbelet et al., 2021). However, there are logical justifications and anecdotal evidence that **a localized humanitarian system could be more timely, cost-effective, and appropriate; would increase access and accountability to affected populations; and would help make humanitarian aid more sustainable** (Barbelet, 2018; Cohen and Gingerich, 2015; Ramalingam et al., 2013; Wall and Hedlund, 2016). This reasoning, which was echoed by several key informants, including local actors themselves, forms the basis for a utilitarian or pragmatic motivation for localization (Interviews 18, 20, 22, 24, 28). This justification turns into an imperative in contexts where

local actors are the only ones with access to the affected population (interview 18), whether this is due to government policy (such as the 2008 Cyclone Nargis response in Myanmar), security issues (such as the 2011 famine response in Somalia), or global restrictions on movement—such as the 2020-2021 COVID-19 pandemic.

However, others believe that localization is a rights-based question and that **shifting power to local actors is simply the right thing to do.** There is a concern that the utilitarian or pragmatic approach could be a double-edged sword and be used to justify an international presence when the effectiveness or capacity of local actors has been undermined or underestimated by the international humanitarian system itself. Several key informants, including INGO representatives and an OECD donor, advocated for a rights-based or ethical view of localization, regardless of questions around effectiveness (Interviews 7, 8, 36). However, one key respondent cautioned against an ideological approach, stating that it reduces a complex issue into a simplified and binary argument that has its own biases (Interview 14).

> "It's like asking 'why is it important to have women in the workplace?' It's just fair, and it's just normal."
>
> — Academic based in the Global North

3. Operationalizing "Localization"

Summary of key points:

- The main operational issues in the localization discourse include funding, partnerships, coordination, capacity building, and leadership.

- Direct funding to local actors continues to be only about 3% of tracked international humanitarian funds, far short of the Grand Bargain goal of 25%.

- Partnerships still tend to be structured around a subcontracting model, which does not provide local actors with meaningful decision-making power or sufficient resources.

- Local actors often cannot access coordination mechanisms because of physical, linguistic, and technical barriers; in addition, only 8% of clusters have local co-leaders.

- Capacity building tends to be short-term in nature and oriented toward meeting project goals, not the priorities of local actors themselves.

The previous section focused on the ways the localization agenda is conceptualized and defined. This section focuses on the ways the humanitarian sector is attempting to put the theory of localization into practice and how it identifies progress across certain key dimensions.

To recap the main contents of the Grand Bargain and much of the early discussion about localization, the agenda centered around four main areas of reform: 1) ensuring that local actors had access to more direct **funding;** 2) greater participation of local actors in **coordination mechanisms;** 3) increasing the number and equity of **partnerships;** and 4) increasing local actors' **capacity**. However, recent research and advocacy efforts have built on this foundation and expanded the view of what localization should look like in practice. Namely, there has been more emphasis on local actors having **leadership and visibility** in decision-making spaces, **influence on policy** that affects them, and ensuring **participation and accountability** from crisis-affected populations (Flint et al., 2018; Van Brabant and Patel, 2018; NEAR, 2019).

It is worth noting an important dimension that is not explicitly mentioned but that cuts across these other areas of reform: power. Among key interview respondents, the greatest consensus emerged

> "From the perspective of the WHS, the goals are the same.... But those commitments are now less important. INGOs are now talking about equity, addressing racism, decolonization, etc. There is an appetite even within the donor community to move beyond conversations about just transferring 25% but thinking about a different model."
>
> — Researcher for a policy group based in the Global North

around **localization being about shifting power to local actors** (Interviews 1, 2, 7, 8, 17, 23). One critique of the Grand Bargain notes that it focused the conversation too much on shifting funds when many actors instead emphasized the importance of decision-making power, agency, and respect for local actors (Interviews 1, 2, 8, 20, 30). The idea that localization needs to be about "more than money" has been affirmed in several studies (de Geoffroy and Grunewald, 2017; Robillard et al., 2020). Concerns are also raised across the literature that current localization goals are too technocratic and do not adequately address the fundamental power imbalances that made the localization discourse necessary in the first place (Barbelet et al., 2021).

However, many actors, including local and national actors, **see value in keeping the goals of localization focused on concrete, technical issues** like funding, coordination spaces, and partnerships, which impact their day-to-day operations. Research involving local and national actors in countries such as Nigeria, Bangladesh, and Iraq has found that many still prioritize issues like funding and coordination over more abstract concepts of power (Grand Bargain Localization Workstream, 2021; Van Brabant and Patel, 2018; Robillard et al., 2020). Data from South Sudan, Somalia, Kenya, and Iraqi Kurdistan from other Feinstein International Center studies affirmed this prioritization of more concrete issues like funding, coordination, and partnership dynamics (Howe et al., 2019; Robillard et al., 2020)

The rest of this section provides a brief overview of the following main topics of the localization discourse: funding, partnerships, coordination, capacity building, and leadership/policy influence.[5] Some of these topics will be further described and addressed in other sections of the paper; this section aims to outline the main issues and some of the latest data.

3a. Funding

One of the most visible Grand Bargain commitments—announced with great fanfare—was setting a **target of channeling at least 25% of global humanitarian funding directly to local and national actors by 2020**. A "localization marker" on funding levels was introduced to help achieve that goal, and commitments were made to increase pooled funds to help achieve that goal (Inter-Agency Standing Committee, 2016). Since then, attention has been focused overwhelmingly on the funding objective.

While some progress has been made toward increasing the total amount of funds going to local or national actors (Humanitarian Policy Group, 2020), there has been little progress toward increasing the

Proportion of Funding going Directly to Local and National Actors (2016-2020)

- 2016: 2.8%

- 2017: 3.0%

- 2018: 3.6%

- 2019: 2.1%

- 2020: 3.1%

Source: Urquhart et al. (2021), p. 68

proportion of funding that goes directly to local or national organizations.[6] ODI (2021) reports that, in 2020, 4.7% of total humanitarian funding—$1.3 billion—went directly to local and national responders; Development Initiatives puts the amount of funds going to local and national actors in 2020 at $756 million, which represents 3.1% of total tracked funds (Urquhart et al., 2021). About two-thirds of these funds were channeled to recipient country governments (ibid).

Whichever set of figures is used, they are well below the Grand Bargain goal of 25%. The most recent assessment shows that **13 of 53 grant-making organizations—mostly NGOs that traditionally work through local church partner organizations—did surpass the 25% level** (Metcalfe-Hough et al., 2020). The only institutional donors that achieved the 25% goal are Switzerland, Spain, New Zealand, the Czech Republic, and the UN Office for the Coordination of Humanitarian Affairs (OCHA), the latter through pooled funds it manages (Urquhart, 2020). Several other UN agencies, including the World Food Program (WFP), also report channeling more than 25% of their funding to local organizations; however, in these cases, the funds are typically channeled through subcontracts, highlighting some of the inconsistencies in reporting on this issue.

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[5] There was limited information in the literature and in our key informant interviews about the intersection between participation/accountability and localization, so it will not be discussed in this section.

[6] These figures represent the amount of funds tracked as going directly to local and national actors. There are no clear, public numbers on the amount of funds that reach local and national actors through sub-contracting as this is something FTS does not track and, in general, is more challenging to track than direct funding. While the proportion of funding has remained relatively static, there are larger total amounts of funding allocated, so the total amount going to local organizations has increased. Nevertheless, the Grand Bargain commitments were about proportions, not totals amounts.

More progress was reported with the use of pooled funds. Country-Based Pooled Funds (CBPFs) and Common Humanitarian Funds (CHFs) have been able to channel a significant proportion of their funding to local and national organizations (Abdulkadir, 2017; Carter, 2018; Poole, 2014). However, inconsistent reporting makes it difficult to track these funds (Urquhart et al., 2021). **Despite the variations in absolute funding levels of pooled funds, the percentage of pooled funds going directly to local actors appears to be increasing**. To date, pooled funds (whether in CBPFs or the UN Central Emergency Response Fund [CERF]) seem to be the most successful form of intermediary funding. However, pooled funds are typically not explicitly designed to support localization, and some aspects of their design may be problematic when it comes to achieving localization goals.

A significant, unresolved issue around funding is that **many institutional donor agencies do not have the capacity to deal with numerous contracts for modest amounts.** They therefore prefer to continue working through UN agencies or large INGOs as intermediaries, as these groups tend to be better able to administer and process high volumes of funds. As a result, a limited number of international intermediaries remain the primary sources of funds that are channeled to local and national organizations. However, this indirect channeling of funds tends to come in the form of restrictive subcontracting partnerships aimed at accomplishing INGO program goals and priorities. (See more on this in the Partnerships section below.)

Another important barrier to funding for local organizations is related to compliance and security issues. **Local organizations are often perceived to lack the accounting, reporting, and risk-management systems needed to satisfy Western donors** (Stoddard et al., 2019; Wall and Hedlund, 2016). This concern is also connected to the Grand Bargain's funding and capacity-building objectives in terms of donor and international partner willingness to adequately cover core costs (Els and Carstensen, 2016; Poole, 2014). This is a controversial issue and will be unpacked more in section 3d.

3b. Partnerships

The development of meaningful and equitable partnerships between international and local organizations continues to be a concern, but there is less information available to judge progress in this area. What is clear from the literature is that **local organizations are frequently frustrated with the subcontracting model of partnership** (Wall & Hedlund, 2016). Subcontracting tends to shift responsibilities and risk onto them but fails to provide them with adequate funding to cover even the most basic administrative costs, denies them an equal or meaningful voice in decision making, and rarely translates into opportunities for future direct funding or leadership (de Geoffroy & Grunewald, 2017; Howe & Stites, 2019; Stoddard et al., 2019). The subcontracting approach is not only an ongoing source of frustration for local organizations, but also a lost opportunity for international organizations in terms of leveraging local actors' contextual knowledge and relationships to improve program design, develop more appropriate responses, and strengthen community accountability and program sustainability (Lindley-Jones, 2018).

Determining who partnerships are formed with is another area of concern. There has long been a tendency for international organizations to compete for the "best" local actors—organizations that are seen as the "most capable" and "successful" based on international standards. This often leaves these organizations feeling overwhelmed while others are excluded (Omaar and de Waal, 1995; Parke, 2019; Willitts-King et al., 2018). **This focus on a select few local organizations can compound concerns about equity in some localization efforts**, as organizations that meet international administrative standards tend to be composed of relatively elite and privileged members of the affected society (such as men, privileged ethnic groups or races, higher-ranked castes, etc.) (Fast and Sutton, 2018; Lambert and Zaaroura, 2018; Lindley-Jones, 2018).

The most functional and equitable partnerships are built over time. This includes engagement prior to and after acute crises in order to build trust (Barbelet, 2018; Featherstone and Antequisa, 2014; Howe and Stites, 2019; Robillard et al., 2020),

underlining the need for long-term partnerships, rather than arriving only when crisis strikes. Recent research indicates that international intermediaries[7] can play a positive role in terms of enabling and supporting local humanitarian actors if key conditions (such as incentives and accountability structures) change (Lees et al., 2021).

3c. Coordination

It is well-documented that many local actors feel excluded from international humanitarian coordination mechanisms, particularly the cluster system (ALNAP et al., 2016; Barbelet, 2018; de Geoffroy and Grunewald, 2017). For local actors, **there are often physical barriers to the coordination and decision-making bodies involved in a humanitarian response.** For example, coordination meetings are often held in capital cities, while many of the most "local" groups are based in affected areas far from the capital (ALNAP, 2016; Wall and Hedlund, 2016). **Barriers can also be political or security-related;** for example, local groups may not have the necessary credentials to access coordination spaces. The 2010 Haiti earthquake is a famous example of this situation, in which many Haitian NGOs were not allowed to access coordination meetings inside of a UN military base (de Geoffroy and Grunewald, 2017). There may also be **language barriers**, both in terms of the language spoken in meetings and the exclusionary use of humanitarian jargon, **limited staff time** at local organizations, and other obstacles (Wall and Hedlund, 2016). Some local groups—particularly less formally organized groups or those that do not typically categorize themselves as "humanitarian"—may not even be aware that international coordination mechanisms exist and/or be using parallel local structures.

There have been some changes in recent years with respect to coordination. For example, during the 2018 Sulawesi earthquake response in Indonesia, coordination meetings were led entirely by national actors, held mostly in local languages, and leveraged more accessible technology, such as WhatsApp (Humanitarian Advisory Group and Pujiono Center,

2019). Other platforms, such as the South Sudan NGO Forum and the NGO Coordination Committee for Iraq, have structures built for and led by local actors to actively coordinate with international peer organizations. However, **in 2019, only 8% of all cluster leadership positions around the globe were held by local or national NGOs** (Metcalfe-Hough et al., 2020). There has been progress in terms of increasing the participation of local and national actors in humanitarian coordination mechanisms, with NNGOs constituting 43% of cluster members and local languages being spoken in about half of cluster meetings (ibid). However, there is a lack of evidence about whether increased participation translates into a meaningful opportunity to lead and drive decision-making efforts in these forums (Barbelet et al., 2021).

3d. Capacity

In the discourse around localization, the term, "capacity," and the prioritization of capacity building are controversial. Much of the capacity building focus in the localization discourse is on ensuring a local organization's ability to meet "international standards," particularly in terms of administrative, accounting, and compliance procedures. **Capacity building is often driven by what the international partner or donor needs from the local partner, not necessarily by the priorities of the local partners themselves, or the needs of the people the local agency will serve.** This underscores the criticism that localization is a form of isomorphism—ensuring that local organizations become more like their international counterparts. The concern is that local organizations will change their structures in a way that makes them dependent on, and primarily accountable to, international donors with a relatively short-term presence in the affected area, potentially undermining the local group's accountability to the affected populations as well as their relationships with more sustainable local funding sources. Many of the compliance-related capacities international humanitarian systems require are resource-inten-

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[7] In the localization literature, the term "intermediaries" is often used interchangeably with the word "partners" because of the position that international partner organizations often occupy between donor agencies and local humanitarian actors.

sive to maintain and may draw an organization's resources and focus away from their own priorities and those of the communities they serve.

There is also a question of **who builds whose capacity, and whose capacity matters?** Capacity budling is often described as international actors "building the capacity" of local actors, while the knowledge that local actors provide to external actors about social dynamics, cultural sensitivity, and political processes is often simply taken for granted (and rarely compensated). Once again, the emphasis on local actors needing to conform to international systems raises several critiques, including isomorphism, the dominance of "upward" accountability, and neocolonialism (Barbelet, 2019; Fast, 2017).

Even if local and international actors could agree on priorities for capacity building, time and resources must be invested over a sustained period of time in order for capacity building to be effective. However, **humanitarian capacity building tends to be short-term, project-based, and designed as "one-off" trainings.** More generally, the lack of adequate support for core operating costs also undermines the capacity of local actors, as it leaves them unable to invest in staff training and retention, longer-term systems development, and other organizational development efforts (Barbelet, 2018).

3e. Leadership and Policy Influence

Since the Grand Bargain, there has been increasing attention on ensuring an emphasis on local humanitarian leadership—not only in humanitarian responses, but also in policy and decision-making fora. Both key informants in this study and the literature have expressed concerns that international actors dominate the localization discourse and policy decisions (Barbelet, 2018b; Roepstorff, 2020). Increasingly, there is a recognition that localization policy should reflect the oft cited call for "**nothing about us without us.**"

In terms of humanitarian responses, many cite the 2018 Sulawesi earthquake response in Indonesia

as an example of **local humanitarian leadership** by the affected government and civil society (Humanitarian Advisory Group and Pujiono Center, 2019). Increasingly, research and policy spaces are being more intentional about **serving as platforms for more diverse voices** that can convey the experience of local humanitarian actors, such as the 2021 Centre for Humanitarian Leadership conference. In addition, there are efforts to create regional or country-specific definitions of and priorities for localization, such as work in the Pacific involving PIANGO, the Humanitarian Advisory Group, and the Australian Red Cross.

On a global policy level, the emphasis on local leadership may be most evident in the framing and execution of the "Grand Bargain 2.0." In this version, there is **greater representation of local and national actors** in the localization workstream, including new signatories such as NEAR and the Alliance for Empowered Aid Partnership (A4EP). In several countries, there have also been efforts to lead country-specific Grand Bargain dialogues to ensure that commitments, efforts, and accountability are contextually adapted, with local and national NGOs in leadership positions during these exercises. In addition, the creation of peer "caucuses" has great potential to increase the diversity of voices in what was previously seen as an exclusive, technical exercise in the Grand Bargain 1.0 (Hatch, 2021).

However, there are **ongoing challenges to supporting local humanitarian leadership**, particularly for national and local government agencies involved in humanitarian and disaster management. These challenges have been particularly glaring given the nature of the COVID-19 pandemic and the role of national health systems in managing the pandemic. In general, the pandemic was widely viewed as an opportunity to accelerate progress toward localization, and there is evidence in some contexts of changes favoring local actors. However, overall, it appears that the impact of the global COVID-19 pandemic may have been a missed opportunity for transformational change (Barbelet et al., 2021; DA Global, 2021).

4. Barriers to and Enablers of Localization

As described in previous sections, while the humanitarian system has made some progress toward the Grand Bargain goals, the original timeframe for meeting those goals has passed, and the humanitarian system is still far from achieving them. The system is even further from meeting the more ambitious goals of system transformation and decolonization. The specific barriers to and enablers of localization vary by country context and the types of donors, international intermediaries, and local actors involved; this section describes significant factors that act as barriers or enablers to localization at the global level.

As identified by key interview respondents and the latest literature, this section outlines the primary barriers to and enablers of realizing some version of the localization agenda. It is worth noting that the literature and interviewees tend to focus more on barriers than enablers; therefore, more barriers are identified, and more evidence is offered around those barriers than around the enabling factors.

4a. Barriers to Localization

Summary of key points:

- Many structures in the humanitarian system—including funding, coordination, and partnership mechanisms—still contain features that exclude local actors.

- There are underlying power dynamics in the system that favor the status quo, including racism, neocolonialism, and a sense of "self-preservation" among international actors.

- There are real and perceived capacity constraints in the system, as well as issues with how capacity is defined and strengthened.

- Underlying the questions of capacity are issues around how risk is perceived, managed, and transferred between international and local actors.

- Many local actors face contextual barriers in their own countries, including issues related to governance, security, and local power dynamics.

- These barriers are all interconnected and need to be addressed through a systems-wide lens.

Structural Barriers

1. **Limited Quantity and Quality of Funding Directed to Local Actors:** It has long been documented that local and national actor receive a small percentage of international humanitarian funding. Even when local actors can access funding, directly or through subcontracts, that funding is often highly restricted. In addition, overhead funding for local actors is significantly lower than that allowed for international organizations and often insufficient for covering basic operational costs. These funding limitations are both an outcome and a driver of poor progress toward localization; without adequate core funding, local actors cannot attract and retain quality staff, participate actively in decision-making spaces, or invest in the institutional

"capacities" upon which they are judged, and they remain dependent on international actors for their survival. This was described as a major barrier to localization in the most recent literature review by Barbelet et al. (2021) and cited by many of the key interview respondents, including local and national actors and donor representatives (Interviews 10, 25, 26, 27, 28, 30, 32, 36, 56).

2. **Limited Capacity of International Donors:** One of the primary barriers local actors face for accessing increased and better-quality funding is that large international donors have significant structural and capacity limitations in terms of managing multiple smaller grants. Key informants, including representatives of major donors, described how donors do not have the capacity to administer more grants of smaller amounts to a more diverse group of recipients. The capacity constraints described by key informants were a combination of insufficient staff and burdensome internal processes and bureaucracy; however, it is possible other internal capacity constraints exist and this could merit further research. These donors therefore favor large international actors, particularly UN agencies, that are generally better able to quickly absorb, disburse, and account for large amounts of funds (Interviews 1, 6, 19, 24, 36).

Other barriers influenced by donor capacity include the tendency of many donors to issue requests for proposals or receive funding requests primarily online and in the donor country's language or a former colonial language. This makes access to funding more challenging for local actors who primarily speak local, non-colonial languages and do not have consistent access to the Internet (Interview 25).

3. **Persistence of the Unequal Subcontracting Partnership Model:** As described above, many international-local partnerships are based on a subcontracting model, which is often rigid, top-down, and task-oriented in nature, and does not provide local partners with meaningful decision-making powers or adequate financial compensation (de Geoffroy and Grunewald, 2017; Lindley-Jones, 2018; Wall and Hedlund, 2016). Many key interview respondents noted that the persistent power imbalances in international-local partnerships make them very transactional (Interviews 4, 7, 21, 22). As with financing, unequal partnerships are also both a product and a driver of poor progress on localization. Remote management in high-risk environments can often compound these dynamics by imposing even more stringent requirements and due diligence procedures while reducing face-to-face opportunities for building trust (Howe et al., 2015).

4. **Lack of Access to Coordination Systems and International Decision-Making Bodies:** As described in earlier sections, for many, localization means local actors being involved in humanitarian decision-making. Many of these decisions happen in designated coordination spaces. However, many key respondents (including an interviewee from OCHA) felt that humanitarian coordination spaces are still largely exclusive and internationally led (Interviews 5, 8, 16, 20, 21, 25). The specific barriers for many local organizations in accessing coordination spaces were described in a previous section.

The most recent literature affirms that, while there has been progress toward getting more local actors into some coordination spaces, there is not yet evidence about whether that translates into meaningful decision making. Furthermore, 92% of coordination bodies have no local leadership (Barbelet, et al., 2021; Metcalfe-Hough et al., 2020).

> "[The donors] all said we don't have capacity to manage multiple partnerships with local actors. It's easier for us to work through UN agencies and let them manage the partners. But often local actors are denied funding on the pretext that they don't have the capacity. And so no one has comprehensive capacity. Even the most resource-rich donors don't have capacity. Why do you always plan for my capacity building? Why don't you allow me to build your capacity? If you can't manage multiple partnerships, you should be managing and building your capacity."
>
> — NNGO Director based in the Global South

In addition, even when local actors have access to regional or country-based coordination platforms, some note a lack of access to global decision-making bodies that set broader policies on issues critical to localization (Interview 25).

> "It is changing slowly, but high in these big structures where things are being decided, I'm not sure if national NGOs are involved. There is tokenistic representation in the HC, and they're recognized within the cluster, but there's no formal co-leadership or co-chairship of the clusters where you would have national organizations as peers to INGOs and the UN."
>
> — Country Director of INGO based in the Global North

5. **Lack of Clear Direction, Measurement, and Accountability Systems:** As described in previous sections, the localization agenda in general lacks a clear direction and concrete targets. While progress has been made on frameworks and indicators to measure localization, significant constraints to and critiques of these metrics remain (Barbelet et al., 2021) and, as described in Section 2b, there are still underlying discussions about the definition and goal of localization. Many key informants believe that, at best,

> "Where there needs to be more work is accountability mechanisms for the Grand Bargain commitments. Your organization can come and say 'We did this' but how do we know? You said you spent 25% of humanitarian funding, but was it subcontracting to transfer of risk?"
>
> — Director of NNGO based in the Global South who is involved in country-level Grand Bargain work

this lack of accepted definition and metrics creates confusion about how to operationalize localization, and, at worst, it creates a cover for inaction and a lack of accountability (Interviews 1, 4, 8, 10, 11, 20, 34, 36). Even in contexts with clear localization commitments, such as the Grand Bargain and Charter4Change, accountability, transparency, and compliance are considered to be weak (Interviews 23, 25, 36).

6. **Lack of Adequate Leadership from the United Nations:** Given how formal humanitarian aid is structured, UN agencies are among the largest recipients of international funding, play a central role in humanitarian coordination and decision-making spaces, and are some of the primary intermediaries for passing funding to local actors. However, a surprising number of key informants expressed frustration at what they perceived to be a lack of leadership on localization across UN agencies. Many respondents said the UN has been slow to change, has not met its commitments, and is often absent from conversations about localization at the global, regional, and country levels (Interviews 6, 13, 15, 16, 19, 24, 26, 30). While it is important to note that the UN is not one organization and that certain agencies have taken greater leadership in this area, the UN as a whole was frequently seen as a bottleneck for systemic change. As one INGO representative described, "I think the UN has to change – you can't do humanitarian reform without UN reform" (Interview 17).

Power Dynamics

Underlying the structural barriers to localization are power dynamics that have prevented progress on many of the key reforms that could help resolve the aforementioned issues. They include the following:

1. **Entrenched Interests of International Actors:** The most common barrier key informants cited was that localization is fundamentally seen as a threat to the business models, power, and privilege of international actors within the system; it was mentioned by policy researchers from both the Global North and South, members of UN agencies and international and national NGOs, and one donor (Interviews 6, 10, 11, 14, 15, 17, 19, 20, 21, 24, 26, 27, 28, 37). Key informants described concerns of international actors as losing everything from job security to a sense of purpose to their ability to have some control in an unpredictable system.

   The most commonly cited concern was that of losing access to funding. If humanitarian funding is seen as a zero-sum game, then giving local actors a greater share of the pie means reducing the funds available to international actors, potentially threatening their survival as organizations. Whether this interest in self-preservation comes from altruistic motives (a genuine belief in the

> "The challenge is of course, the tyranny of bureaucracy as Degan Ali calls it. But also deep down, is the fear of changing the status quo. Because it has implications on so many levels, starting with the job security of people working in the sector, going even deeper the sense of not being so important anymore. What does that mean in terms of having a meaningful life and career, what does it mean in terms of planning for the future? We have been considered the experts. What does it mean when you're no longer the expert and you're on the sidelines, and maybe in ten years you'll be out of the job? Fear comes in many forms, and what I see now in my interactions is different forms of fear that try to block this process or slow it down."
>
> — Researcher based in the Global North

institution's capacity to save lives) or from less altruistic ones (from the market forces and business models that shape many institutions), few organizations would deliberately pursue a policy of becoming smaller. Indeed, some INGOs that have fully embraced localization have seen their budgets and staff sizes reduced (Interview 17). The "self-preservation" of international actors was also identified as a key barrier to localization in the most recent literature review carried out by Barbelet et al. (2021).

In interviews for this study, this tendency toward self-preservation was linked to other barriers to localization, including a **lack of genuine commitment to change** from international actors, which has turned localization into a **buzzword or box-ticking exercise.** The implication is that many international actors are using localization terminology to justify their existing practices of subcontracting to local organizations without actually shifting power or resources in a meaningful way.

> "It's very uncomfortable for international organizations to hand over their power, because if you fully embrace localization and go down that path, you're basically writing yourself out of existence."
>
> — Researcher for a policy group based in the Global North

2. **Racism and Neocolonialism:** As noted above, since the amplification of the Black Lives Matter movement in 2020, there has been increased attention to the role that structural racism and neocolonialism play in humanitarian structures. In the view of some key informants, neocolonialism establishes a dynamic in which actors in the Global North are reluctant to give up control over actors in the Global South (sometimes over actors in their country's former colonies), while racism is a driving factor in double standards for and lack of trust in local actors (Interviews 6, 13, 15, 16, 19, 24, 26, 30). This dynamic has been increasingly discussed and affirmed in the humanitarian news, policy sphere, and literature (Currion, 2020; DA Global, 2021; Slim, 2020), and an increasing number of international actors

are beginning internal reckonings with these issues of diversity, equity, and inclusion.

3. **Ongoing Focus on International Actors and Voices:** The vast majority of discussions, research, and published papers on localization (including this study) have come from institutions in the Global North. While this is not unique to localization—recent studies show

> "[The] problem is how the system is structured. We want to make change. There are commitments in the Grand Bargain, but the people talking about it are not locals… International organizations have the space. Local organizations don't have any voice. There is no forum for local organizations. So [there is] no real dialogue."
>
> — Leader of an NNGO Forum based in the Global South

that the vast majority of articles on international development and global health come from the Global North (Liverpool, 2021; Oti and Ncayiyana, 2021)—it has a particular impact on this topic. Several authors have argued that, by rushing to define localization without adequately listening to local actors, the localization agenda itself was essentially set by international actors (Fast, 2017; Roepstorff, 2020). A recent article highlighted how consultations with local actors for the World Humanitarian Summit that highlighted diverse and complex views on the roles of the state, civil society, and the private sector were boiled down to lines such as, "more support and funding tools for local and national responders" in the final version of the Grand Bargain (Baguios, 2021). Many key informants also observed that the localization agenda's continued focus on international actors and voices has undermined its very goals (Interviews 3, 10, 12, 13, 15, 26, 27).

Real and Perceived Capacity Issues

1. **Real and Perceived Capacity Constraints:** There is a widespread assumption in the literature, policy, and practice spheres that, compared to international actors, local actors have lower administrative, technical, and operational capacities; a limited ability to scale their operations; and less capacity to be principled in their humanitarian responses (Barbelet, 2018, 2019; Schenkenberg, 2016; Wall & Hedlund, 2016). As noted earlier, these limitations—whether real or perceived—are cited as some of the primary reasons for denying local actors more and better-quality funding. However, these perceived capacity concerns are broadly generalized; one can find many examples of local and national actors with strong capacities and international actors with limited capacities, and vice versa. In addition, many of these generalized assumptions are not backed up by evidence in the literature (Barbelet et al., 2021), and they may be influenced by racist or neocolonial biases (DA Global, 2021). Several key informants, including some from local organizations, brought up what they considered to be the capacity constraints of local actors, but discussed them primarily in the context of the international system not appropriately understanding or strengthening local capacity (Interviews 32, 56, 59). (See following points.)

2. **How Capacity Is Defined:** It is important to note that "capacity" is primarily defined by international actors from the Global North in ways that concentrate on, prioritize, and favor the way international actors are structured and function (Barbelet, 2019; Barbelet et al., 2021; de Geoffroy & Grunewald, 2017b). As noted earlier, the understanding of capacity tends to focus on administrative and financial management abilities that reinforce "upwards" accountability to international intermediaries and donors. In other words, it concentrates on how closely an organization mirrors typical or ideal international organizational standards. Capacities more generally associated with local actors—such as context awareness, language and cultural competencies, and the ability to navigate complex situations to secure access—are often overlooked, undervalued, or taken for granted.

3. **Ineffective Capacity Building:** Frequently, international attempts to "build the capacity" of local actors are not effectively designed or implemented. For example, capacity building activi-

ties tend to be determined by the international partner, delivered by the international partner (regardless of whether that partner is best suited to deliver the training), focused on meeting immediate project objectives (as opposed to more strategic or institutional objectives), and generally short-term, one-off, and ad hoc in nature (Barbelet, 2018, 2019; Wall & Hedlund, 2016). One key informant noted that if the international humanitarian system has been in a country for decades, it is a clear sign of failure in systems building and appropriate capacity strengthening (Interview 20).

4. **Undermining Local Capacity:** Several key informants for this study noted that many international actors are actually undermining the capacity of local actors, primarily by "poaching" local staff (Interviews 25, 26, 28, 36). This phenomenon has been broadly validated in the literature (Ayobi et al., 2017; de Geoffroy & Grunewald, 2017b; Featherstone, 2017). Other key informants commented that the trend of "nationalizing" INGOs was undermining local capacity to raise funds from national and local donors; nationalized NGOs were seen as "moving in" on an already limited domestic donor base while still having access to international funds (Interview 24). As previously described, the short-term and low-quality funding generally available to local actors from international actors also undermines local capacity to invest in quality staff, systems, and processes. Other forms of undermining local capacity include the tendency to undermine institutional diversity by encouraging local organizations to adhere to "international" norms— the tendency towards isomorphism mentioned above.

"[International actors] need to stop undermining local capacity. They always undermine us... For example, they have skilled staff they recruit because their fund[ing] is big. We can give $100 per month, and they give $2000 per month."

— Director of an NNGO based in the Global South.

Risk: Aversion, Transfer, and Management

1. **Donor Risk Aversion:** Perceptions that local actors have a limited capacity to manage funds appropriately and adhere to humanitarian principles gives rise to a perception that providing direct and significant funding to local actors is inherently high-risk. Donors are generally considered to be risk-averse (particularly with respect to fiduciary and legal risks). As such, they establish high compliance requirements for funding, implementing, and reporting on humanitarian projects (Barbelet et al., 2021; Stoddard et al., 2019). Key informants for this study, including international donor representatives, acknowledged that these compliance requirements are often too burdensome for many local organizations and constitute one of the major barriers to access of direct funding (Interviews 14, 18, 21, 25, 26, 27, 29, 31, 34, 35). In addition, there is a sense that local actors are often held to higher levels of scrutiny than international actors.

"The big issue is risk appetite. This is focused on fiduciary risk. There is not really any evidence that local organizations spend money more fraudulently. The big issue is reputational risk: if the UN misspends money, that is on them; if we give to a local organization and it's spent badly, that is on us. So, there are huge disincentives on the risk side."

— OECD donor agency representative

2. **Domestic Pressure and Legal Constraints on Bilateral Donors:** The aforementioned financial risk aversion of bilateral donor agencies, which are typically funded by taxpayers and regulated by national governments, is reinforced by domestic legislation, political pressures, and public perceptions. This includes counterterrorism legislation, foreign policy objectives, pressures to justify the benefits of foreign aid to the donor country (including prioritizing or exclusively funding NGOs from the donor country or region), and strict financial audits, among other elements. Many key informants acknowledged

that these domestic pressures place constraints on donors in the context of localization (Interviews 6, 11, 16, 17, 26, 34).

> "We're under pressure from the Grand Bargain Commission, but at the same time, there is a very problematic legal framework in the European Commission...we can't finance non-European partners! ...The legal issue is a big constraint. This is the biggest constraint."
>
> — OECD donor agency representative

Public perception is another key issue; it is related to both media reports of mismanaged aid and outdated perceptions of what humanitarian aid is or should look like (Interview 14). These perceptions provide another source of pressure on donor agencies, which are often accountable to a public that does not necessarily understand the realities and complexities of delivering aid.

> "What I've seen in the Grand Bargain, the donors have the fear of losing support from the taxpayer, who are quick to judge humanitarian action based on the narrative of the white savior."
>
> — Researcher for an INGO based in the Global North

3. **Transfer of Risk and Compliance Requirements to Local Actors:** International intermediaries often pass high compliance requirements on to their local partners. This can create significant time burdens, generate perverse reporting and operational incentives, and undermine more equitable and strategic partnerships (Barbelet et al., 2021; Howe and Stites, 2019). High compliance requirements may also limit which local organizations can even partner with international actors, further compounding the "isomorphism" tendencies outlined above by excluding local organizations that represent marginalized groups, as they tend to be smaller and have more informal structures. In addition, there is significant evidence that international actors often

transfer other forms of risk to their local partners without providing adequate financial or operational support, or without fully understanding the complex operational risks that local actors actually face (Barbelet et al., 2021; Stoddard et al., 2019). These include risks to staff safety, but also the risk of shifts in funding sources or availability, and a variety of idiosyncratic or context-specific risks. Some even fear that localization is being used by international intermediaries as a pretext for transferring costs and risks to local actors, as opposed to establishing a meaningful sharing or shifting of power (Interview 29) (de Geoffroy & Grunewald, 2017b).

Contextual Challenges

While this study focuses on structural barriers to localization at the global level, it is also important to consider context-specific challenges and barriers to localization. Several issues raised by the literature and key informant interviews are briefly highlighted below.

1. **Repressive, Corrupt, and/or Weak National Governments:** In several studies that have posed open-ended questions about the priorities and concerns of local actors, national governments have been named as one of the greatest obstacles to localization. For example, a recent study in Haiti and Colombia noted that national and local state actors are seen as the logical leaders of a true push for a "localized" humanitarian response in these countries; however, civil society often considers them unable (due to a lack of technical capacity) or unwilling (due to the politicization of aid) to play that role in a meaningful way (Robillard et al., 2020). Key informants from Haiti in this study reinforced the view of the government as a barrier, while key informants in Honduras cited the deep corruption in the Honduran government as the primary barrier to localization in that country (Interviews 39, 40, 41, 42, 43, 44, 46, 48, 49, 50, 55). There are many other examples of contexts where national governments have limited the humanitarian space for local, national, and international actors.

> "The population has no confidence in the government. The government is not seen as an apolitical or helping institution. There are many challenges to it. That neutrality line is very difficult for [local] organizations in [our country]."
>
> — Representative of an NNGO based in the Global South

2. **Non-permissive Security Environments:** There is a common perception that, given their higher visibility and resources, international actors are at greater risk of targeted violence. To reduce overall risk, many international actors partner with local actors in situations they deem to be too risky for their own staff. However, in many high-risk situations, local actors may have a higher risk of security incidents, violent reprisals, and other physical risks than international actors. For example, in some urban areas in Haiti, hyper-local actors may currently be more vulnerable to gang violence than international actors; local actors in Honduras cited similar vulnerability among local actors, particularly those that do human rights work (Interviews 46, 53, 54, 58). In situations where local or national NGOs may face increased security risks or higher chances of reprisals, particularly for working with marginalized populations, there may be incentives to maintain a more visible international presence.

3. **Local Power Dynamics:** Crisis-affected societies are not homogenous. There are internal power dynamics based on race, ethnicity, clan, caste, clan, gender, sexual orientation, gender identity, physical disabilities, intellectual syndromes and conditions, political affiliation, geography, livelihoods, etc. As previously noted, the localization debate tends to be carried out in a way that prioritizes formal NGOs, which are similar in structure and function to international organizations, and they may represent a country's elite. Implementing localization reforms without paying sufficient attention to the diversity of and dynamics between different local actors could end up further excluding marginalized groups, such as women or sexual and gender identity

minorities. Some key informants saw these local power and social dynamics as a barrier to achieving an equitable form of localization (Interviews 2, 10, 25). However, key respondents also noted it was important to avoid using these dynamics as an excuse for saying, "it's complicated," and avoiding localization commitments. Rather, it is important that localization efforts pay attention to and respect the diversity of all crisis-affected communities.

> "It is very much important to the commitment of internationals…to transfer at least 25% of the resources to the local humanitarian actors. But most of that goes to male-headed organizations. Because the INGOs who are signatories, they sometimes undermine us."
>
> — Director of a women-led NNGO based in the Global South

Interconnectivity of Barriers

It should be evident that these barriers to localization do not exist independently of each other; many contribute to or reinforce each other. As with most policy reform, localization raises questions about how to change systems, and it should therefore be viewed through a systems lens. Figure 1 below depicts most of the main barriers identified in the previous section and shows, in a conceptual map, how links between them can be mutually reinforcing.

It is important to note that this map is not exhaustive or absolute. (It does not show every systemic barrier to localization or every connection between them.) It is a heuristic device with the aim of illustrating how the key challenges facing the localization agenda are interconnected, and why individual barriers cannot be viewed—or addressed—in isolation.

Figure 1: Conceptual Map of Barriers to Localization
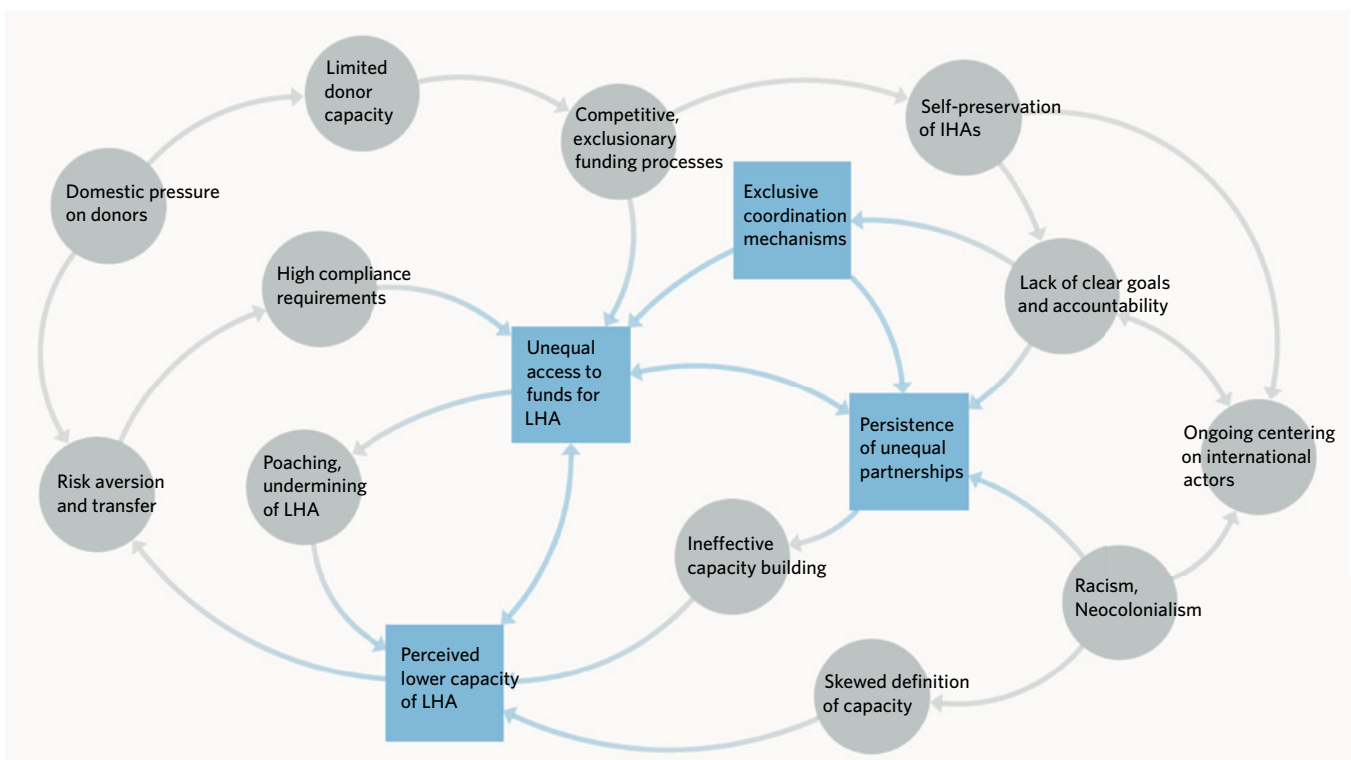
Legend:

Blue boxes represent four conventional targets of localization reform.

LHA = Local Humanitarian Actor

IHA = International Humanitarian Actor

4b. Enablers of Localization

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Summary of key points:

- Local humanitarian actors have been carrying out significant work to push the localization agenda forward through advocacy and collective organizing.

- Certain key international actors, mechanisms, and commitments are playing a progressive role in advancing the localization agenda at the country and global levels.

- Global phenomena like increasing humanitarian access issues, the COVID-19 pandemic, and the broader discourse on racial equity are pushing the conversation and action on localization in new directions.

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While barriers to localization are significant, entrenched, and interconnected, there are also forces that help enable localization at a global level. This section describes the main enablers of localization as identified by key informants and the recent literature.

Local and National Actors

1. **Local Advocacy and Mobilization:** In interviews for this study, local actors' efforts to network, mobilize, and advocate for their own priorities was, by far, the most frequently mentioned driver of localization (Interviews 1, 5, 9, 11, 16, 17, 18, 23, 27, 28, 29, 30, 32). At a global level, the work of organizations like NEAR and Adeso were noted as examples of effective advocacy for maintaining pressure on international actors to meet international commitments. At specific country levels, there were many examples of local actors coming together in networks and platforms to increase what one researcher called their "collective bargaining power" (Interview 27) to advance localization. Some key informants asserted that localization is inevitable because of the ongoing and increasing organization of local actors, particularly in the Asia Pacific region.

> "Largely, the international humanitarian system hasn't changed—there are still the same donors, the same systems. But change is happening irrespective of that. There are more local coalitions who have greater competence to do things on their own terms. In the Asia Pacific [region], the international system is increasingly redundant where many countries are saying no to international assistance. There is much more competence to focus on domestic systems."
>
> — INGO representative in an OECD country

2. **Existing Social Connections and Networks:** In addition to formal efforts by more established organizations, it is important to note that there is a strong foundation of social connectedness, mutual aid, traditional or customary disaster response, and social safety nets in nearly every society around the world. While this societal support may not commonly be recognized as a "driver" of localization, it can certainly be framed as an enabler of localization; these capacities are in place and operating in the "background" of nearly all humanitarian responses. The literature has increasingly documented and recognized the importance of social connectedness and networks in humanitarian survival and recovery (DEMAC, 2016; Humphrey et al., 2019; Maxwell and Majid, 2016). While these systems are imperfect, and may reflect local power and social dynamics, they may represent the ultimate expression of what the localization agenda is supposed to be about. However, it is important to note that there is a distinction between recognizing, respecting, and supporting these social networks, and leveraging or instrumentalizing them for short-term humanitarian priorities (such as access), which may end up undermining them in the long term (Interviews 10, 59). Another related strategy is survivor and community-led response (SCLR)—a facilitated approach to having communities conduct their own needs assessments and lead their own responses (Corbett, et al., 2021). All these approaches are slightly outside the mainstream localization agenda, but all represent important and under-recognized forms of locally led humanitarian action.

International Actors and Mechanisms

1. **Progressive International Actors:** As a collective group, UN agencies and INGOs are the subject of broad critiques regarding localization. However, some individual international organizations appear to be taking localization seriously and putting their commitments into action. These actions include divesting from direct implementation; investing in local partner capacity over the long term; and generally building longer-term relationships with diverse local actors. Key informants identified over a dozen international organizations—including INGOs, Red Cross actors, and UN agencies—that are "walking the talk" on localization at a global or country-specific level (Interviews 11, 13, 16, 17, 19, 27, 28, 30). While this factor could be seen as an outcome of other changes in the system (such as international commitments or donor policies), in specific country contexts, a particularly proactive international actor working to advance the localization agenda was seen as a catalyst that enabled other forms of progress.

2. **Progressive Donor Policies:** While donor policies in general (particularly around risk and compliance) have been broadly criticized as a significant barrier to localization, some individual donors and specific policies are considered more progressive and, therefore, as enablers of localization (Interviews 4, 5, 17, 36). Examples from key informant interviews include working to incentivize more equitable partnerships; policy changes to cover more core costs for local organizations; and intentionally working with consortia and sources of pooled funds to reach more local partners. In addition, some key informants noted that they are beginning to see shifts in donor approaches that are motivated by pragmatic, ethical, and geopolitical factors (Interviews 1, 9). A recent literature review by the Humanitarian Policy Group (HPG) highlights other progressive donor policies, several of which are listed in the box to the right.

Select Examples of Progressive Donor Policies

- Stand-alone, multi-year localization projects

- Incorporating localization as a core component of other projects and programs

- Requiring evaluation of localization-specific objectives in projects or responses

- Investing in large-scale research projects and reviews

- Joint meetings with international and local partners

- Requiring partners to develop clear exit strategies

- Developing harmonized reporting frameworks

Source: Barbelet et al., 2021 pp. 34-35

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3. **The Growth of Pooled Funds:** Country-based pooled funds (CBPF) have been identified in the literature as a comparatively effective means of getting funds to local actors (Barbelet et al., 2021). Several key informants from donor agencies identified pooled funds with local leadership as important enablers of localization; they allow donors to work around some of their existing constraints and get more funds to local actors. However, these respondents also recognized that they cannot rely on pooled funds alone to meet their localization commitments (Interviews 32, 34, 35). There is also a distinction between pooled funds controlled by actors from the Global North, and pooled funds with strong leadership by actors from the Global South. One key respondent highlighted the importance of one pooled fund as a "localized fund where local organizations are decision makers" (Interview 29). It is important to note that, in and of themselves, pooled funds may not automatically lead to greater funding access for local organizations unless that is an intentional and explicit part of their design.

4. **The Growth of More Inclusive and Locally Led Coordination Platforms:** As described in the previous section, local actors still face significant barriers to accessing coordination platforms. However, in some countries, progress appears to have been made toward establishing more open, inclusive, and locally led coordination platforms. For example, coordination efforts for the Sulawesi earthquake response in Indonesia were locally led and more accessible (Humanitarian Advisory Group and Pujiono Center, 2019), as were coordination platforms in Iraqi Kurdistan (Robillard et al., 2020). Key informants in Lebanon, South Sudan, and Honduras cited the emergence of stronger, locally led coordination platforms as good models and enablers of localization in these countries (Interviews 16, 28, 45, 54). In general, these were independent, civil-society-led platforms that were able to engage with international organizations in coordination and/or advocacy.

5. **The Grand Bargain and Other International Commitments:** While there have been many critiques of the Grand Bargain commitments and processes in this report and in the literature, several key informants observed that the Grand Bargain has played an important role by driving the localization agenda forward on a global level. It was described as having "put localization on the map" (Interview 21), creating a "global consensus" (Interview 27), and being "very useful in terms of internal advocacy and going through the change management process" for INGOs (Interview 5). The recent HPG literature review also cited the Grand Bargain as a significant driver of localization (Barbelet et al., 2021). The recent Grand Bargain 2.0 has tried to respond to critiques from the original Grand Bargain by building a more inclusive consultation and commitment process, as well as continuing to prioritize localization. Other key global commitment structures, like Charter4Change, play a similar role in establishing global standards and accountability structures.

Global Context Issues

1. **Increasing Challenges for Humanitarian Access:** As climate change, armed conflicts, and protracted crises continue to dominate the humanitarian landscape, access to crisis-affected populations has become an ever more challenging issue. Almost by default, this leads to a greater reliance on and acknowledgement of the role of local actors for providing humanitarian assistance in some of the world's most challenging humanitarian contexts (Barbelet et al., 2021). Indeed, some key informants from INGOs noted that access issues were one of the key drivers behind their organizations' decisions to invest in local partners, particularly in conflict situations, such as those in Myanmar and Yemen (Interview 18).

> "With the external aid that came, we had to look for agents who were actually in the community, so that the aid could enter that way. Because they were afraid and had to plan about how to enter. Those who are in the community actually know the rules and how to manage them. External organizations don't know that."
>
> — Representative of an NNGO based in the Global South

The increasing frequency and growing scale of natural disasters caused by climate change, combined with physical access issues, such as roads destroyed by earthquakes or hurricanes—as seen in southern Haiti in 2021—also compounds access issues and demonstrates the critical role of actors already on the ground. Some key informants mentioned that a sense of "fatigue" among donors and international actors in places with frequent or protracted disasters opened space for local actors to assume greater leadership on the ground (Interview 59). Previous FIC studies in Somalia and South Sudan have highlighted the importance of access and proximity, sometimes on a hyper-local level, of local actors as one of their key strengths and how, in many places, the response is a default one because international actors cannot access the population or leave when access becomes challenging (Howe et al., 2019).

2. **The COVID-19 Pandemic:** Many key informants and several recent studies (DA Global, 2021; Barbelet et al., 2021) see the COVID-19 pandemic as a "wake-up call" with respect to access issues and, therefore, a potential driver of localization. Most key informants, and the literature, acknowledge that the pandemic did not translate into meaningful and lasting changes in the system; however, it has highlighted the fragility of a system concentrated on a small group of international actors that move between crises and the importance of frontline, local organizations (Interviews 1, 3, 4, 5, 8, 11, 16, 17, 20, 28, 32, 36). The pandemic also forced many actors to think creatively to navigate new restrictions and changing policies and practices that may have previously seemed unchangeable. For example, some coordination meetings and global fora shifted to virtual platforms like Zoom; this made them more accessible to local actors who traditionally had not been able to travel and attend them (Interview 8). Several donors noted that the pandemic forced them to rethink their approaches and recalculate some of the tradeoffs they were willing to make (Interviews 32, 36).

> "COVID, in a way, shone a light on the inequality, but also on local NGOs and government capacity. They had to step up because there were no internationals, so it showed they could do it."
>
> — Representative of a private philanthropy group based in the Global North

The withdrawal of international actors from many areas due to pandemic restrictions also offered a sort of "natural experiment" through the opportunity to challenge perceptions of local actors' low capacity. However, while it is still too early to fully assess the enduring impact of the pandemic on issues like funding, according to the 2021 Global Humanitarian Assistance Report, the pandemic did not result in significant new funding being directed at local and national actors. While the proportion of funding going directly to local and national actors in 2020 increased by 1% from 2019, it was actually smaller than the proportion going to local and national actors in 2018 (Urquhart et al., 2021). Therefore, the existing data do not indicate that COVID-19 brought about any meaningful increase in direct funding to local actors.

3. **Global Discourse on Equity:** Global conversations around equity, racism, and decolonization—sparked and amplified by the Black Lives Matter protests in the aftermath of the murder of George Floyd in the United States—were cited as a major factor in driving localization forward (Interviews 5, 9, 14, 16, 17, 20, 33, 37). The global discourse around Black Lives Matter provided a platform for highlighting the inequities in the humanitarian system that need to be addressed; one key informant said this helped translate localization into "a much stronger, normative principle [that has] moved into the mainstream" (Interview 17).

> "I don't think we can disconnect the relationship between localization and equity and inclusion… the events of COVID-19 and BLM. I think it is putting localization to the forefront."
>
> — Representative of a UN agency

4c. Other Key Issues and Controversies

Summary of key points:

- The role of the affected state in localization is controversial: national governments are often seen as both the greatest potential enabler and the greatest potential barrier to effective localization, particularly in protracted crises.

- There is a growing trend of "nationalizing" INGOs. Some see this as a positive step toward greater decentralization and accountability; others view it in a more negative light where international actors are infringing upon the already limited space of unaffiliated local actors.

- There is a common (mis)perception that local actors are less able to adhere to humanitarian principles; this a broad generalization, which is not proven in the literature, and it may be serving as a "wedge issue" against localization.

The interviews and literature review gave rise to several additional issues that are considered controversial. They do not fall neatly into categories like localization "barrier" or "enabler;" rather, they are context-specific considerations and challenges. As a result, there is little consensus on how to address these issues. Indeed, there remains a dearth of evidence on these topics.

The Role of the State

Much of the discussion around localization focuses on the role of local NGOs and civil society. However, the role of government—both local and national—is an important element of the overall policy concern. The technical role of governments is clear: they set the overall policy environment for humanitarian action (Interview 17); possess the mandate and considerable capacity for disaster management (Interview 27); and frequently play a key coordination role (Interview 28). Everyone agrees that **the government of the affected state is the primary duty-bearer and, beyond that, clearly sets the rules of engagement for all actors.** But the "rules" can be anywhere from highly restrictive to generally permissive toward humanitarian actors—both local and international—depending on the context (Interviews 3, 12, 17, 27, 28).

However, views about the state's role are sharply divided. Some key informants see governments as a central actor in the local humanitarian response. The 2018 response to the Sulawesi earthquake and tsunami in Indonesia is cited as one example of a situation where the government led a primarily local response to a major disaster (Humanitarian Advisory Group and Pujiono Center, 2019). Several key informants from the Global South focused on the role of the state when asked to define their vision of localization (Interviews 12, 56, 57, 58, 59). Some believe that localization should focus less on international intermediaries and more on **improving state leadership in a humanitarian response and strengthening state coordination with local non-governmental groups.**

> "We've missed so many chances at reform. I want localization to work, but I am cautious. Anything that doesn't end in changing the relationship between the state and local organizations, it's not going anywhere."
>
> — Researcher based in the Global North

On the other hand, especially in contexts where the government is a party in violent conflicts, humanitarian actors can be very wary of engaging with the government. Indeed, many key informants across the various contexts had **significant concerns about the state being unable or unwilling to carry out its humanitarian function, politicizing aid, or leveraging aid policies to punish political enemies or the opposition.** Many key informants in Honduras cited the politicization of aid by the government as a barrier to localization (Interviews 40, 41, 43, 46, 47). One key respondent from another country noted, "To take the most obvious example at the moment: are

you going to call on the government of Ethiopia to address the needs in Tigray?" (Interview 21).

There is limited research on this topic. The main set of studies was conducted over a decade ago by the Humanitarian Policy Group (Harvey, 2009). **A significant gap remains in terms of research and guidance on the role of international actors and donors in protracted crises where governments are party to a conflict.**

The "Nationalization" of INGOs

One of the controversies arising in the debate about localization is whether and to what extent INGOs that "nationalize"—that is, spin off an independent country office with its own local governance, but with ties to an INGO alliance (such as World Vision, Oxfam, and ActionAid)—can legitimately be counted as "local" actors. When tracking the "localization marker" for funding, OCHA's Financial Tracking Service defines local and national non-state actors as "organizations engaged in relief that are headquartered and operating in their own aid recipient country and which are not affiliated to an international NGO" (IASC, as cited by Barbalet et al., 2021). Other definitions are less watertight. For example, Fast and Bennett (2020) note that "local" is relative and relational, suggesting that nationalization should be considered in context or even on a case-by-case basis (Fast & Bennett, 2020).

There are very different views on whether nationalizing INGOs is a positive or negative step in terms of localization. Van Brabant (2016) notes that, if viewed in a **technocratic sense** (localization as decentralization, putting decision-making power closer to the actual context), **INGO nationalization would be viewed as a positive step**. However, if viewed in a more **political sense** (localization as shifting power relations), depending on the voice and agency of the local affiliate, **nationalization might simply be an INGO strategy to position themselves for a switch in donor preference** and "get in the queue" early.

Key informants primarily held the political view, albeit with some caveats. Some straightforwardly suggested that INGO nationalization is an encroachment on the fundraising space of local organizations and is thus a "new phase of colonialism"

(Interview 24). Others suggested that, along with other considerations revolving around registration, acceptance of operations, and the decentralization of decision making, fundraising was, at a minimum, a serious part of the calculus in nationalization (Interviews 2, 9, 16). Still others disagreed: at least one respondent saw "localization" as much more of an attitude—a willingness to shed the trappings of INGO "saviorism" and take a humbler, listening approach to local communities, regardless of affiliation with broader networks. In this view, localization and decolonization are "not just about money, [but] about who makes decisions? How do we work towards community decision making, agency, respect, dignity—not money?" (Interview 15).

Humanitarian Principles

In many reviews, **it has been suggested that local humanitarian actors will be unable to act in a manner that is wholly consistent with humanitarian principles because they are embedded in a given context** (de Geoffroy & Grunewald, 2017b; Howe & Stites, 2019; Svoboda et al., 2018). Indeed, some key informants expressed doubts about the ability of local organizations to operate in a neutral manner. Sometimes the independence or impartiality of local actors was questioned, but the primary focus was on neutrality (Interviews 4, 5, 9, 19, 28). The strongest argument behind the idea that local organizations may not be able to operate independently or impartially comes from Médecins sans Frontières (MSF), which points out a distinct feature of local organizations' operations in natural disasters and conflicts: local organizations are embedded in local contexts. This makes them better able to access local populations, communicate with them, understand their needs, etc., but it also makes it impossible for them to act neutrally or impartially in conflict. (Schenkenberg, 2016).

Although there are some examples of local groups not acting in an impartial manner, **there is little evidence to support the claim that local actors are generally less principled than international ones** (Barbelet et al., 2021). To support his arguments, Schenkenberg (2016) points out that Somali NGOs are often affiliated with a given clan—and therefore favor that clan both politically and for humanitarian assistance. He also dwells extensively on the Syrian

Arab Red Crescent Society as an example of a supposedly neutral and impartial humanitarian actor that has, in effect, been an arm of the Assad regime throughout the Syrian civil war, privileging regime-friendly populations and excluding or punishing opposition-friendly populations. While both observations are true, they hardly constitute a representative cross-section of local humanitarian actors, and it is an exaggeration to characterize all Somali NGOs as "clan-based" (Maxwell and Majid, 2016).

A number of key informants **suggested that principles are raised as a "wedge issue" or gatekeeping device to prevent local actors from competing with international actors** (Interviews 4, 5, 18, 28). Some observers (Robillard et al., 2020) suggest that international actors should consider, but often overlook, a more nuanced, contextualized interpretation of these principles. For example, there are subtle differences between "equal distribution" and "needs-based distribution" of humanitarian assistance. Western agencies tend to see the latter as "principled," but recipient populations see the former as more principled (Jaspars & Maxwell, 2008; Maxwell & Burns, 2008). Thus, "meeting humanitarian principles" may be less a question of adhering to the specifics of the principle than understanding how a principle is interpreted in context. In sum, in terms of questioning of the commitment of local humanitarian actors to humanitarian principles, much of this critique is based on allegations rather than evidence; for the most part, the questions are raised, but not thoroughly explored or adequately supported.

5. Roles and Recommendations for Donors around Localization

Summary of key points:

- Large international donors have a critical role to play in supporting localization, but they also need to take a "do no harm" approach to any programs and policy changes.

- Donors can reform their direct funding systems to make them more accessible to a more diverse set of local humanitarian actors.

- Donors can help create an "enabling environment" for localization by investing in key structures and services at the country level.

- Apart from funding, donors can support localization by intentional and sustained engagement with diverse local actors; analyzing and addressing internal bureaucratic and capacity issues; and coordinating with other donors.

The recommendations below are phrased in terms of recommendations to large international donors, but they are broadly relevant to the formal humanitarian community as a whole.

5a. The Role of OECD Donors in Localization

As a group, the main OECD donors account for most of the funding in the formal humanitarian system. **Five donors alone—the U.S., the EU, the UK, Germany, and Japan—account for nearly two-thirds of all funding**. The remaining OECD members contribute an additional 20% of the funding, with Middle Eastern donors providing most of the rest (OCHA/FTS n.d.).[8] Thus, the behavior of key donors can have a major impact on humanitarian policy and, in particular, on resource flows. **Given their role as standard setters, their convening power, and their ability (or aversion) to invest in an enabling environment, these large donors can influence the**

course of localization. While no single donor can wield unilateral influence, both the review of the literature and the interviews suggest that a relatively small group of donors could make a big difference in the way that localization proceeds.

However, key informants acknowledged that **donors face numerous constraints**, including accountability to legislatures and taxpayers rather than affected populations (Interviews 16, 20, 26). The humanitarian departments of donors are frequently understaffed and overworked, and therefore do not have the bandwidth for a more creative approach (Interview 17). Given the context specificity of localization (see next section), a one-size-fits-all approach is not possible; rather, much attention must be paid to each specific context, further challenging donor capacity (Interview 18). Donors are also constrained by their limited ability to take risks on localization (Interviews 7, 17, 23). Some private philanthropy is stepping up in funding local actors, but it remains to be seen which approaches, if any, can or will translate into practice for bilateral donors (Interview 30).

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8 UN OCHA Financial Tracking Service: https://fts.unocha.org/

Localization embraces twin objectives: building local systems for response (a "development" objective) and serving the emergency needs of an affected population (a "humanitarian" objective). This is one area in which **an approach more informed by "nexus thinking" may be helpful** (Interviews 18, 26). The Grand Bargain notwithstanding, some suggest that there is no "common agenda" among donors with respect to localization, which means donors may not recognize the power they have to promote this agenda (Interview 20).

It is also worth noting the inherent challenge in defining a role for donors based in the Global North when localization is primarily about centering on and adapting to organizations based in the Global South. Given a long history of the real and perceived inter-mingling of foreign aid with foreign policy, some key informants expressed skepticism about the ability of donors based in the Global North to be truly willing and able to give up the control that a full commitment to localization would require.

Other key respondents felt that **large international donors should ensure a "do no harm" approach to localization**, as not all local actors, platforms, or networks might want or benefit from an engagement with the international humanitarian system (Interview 59). For example, the investments, partnerships, or capacity building activities that localization efforts currently prioritize could disrupt some informal, grassroots, or mutual support groups or networks. This concern is echoed in the literature, which questions whether international actors may inadvertently undermine networks based on social connections if they are "instrumentalized" to meet humanitarian goals (Humphrey et al., 2019).

Several recommendations emerge from the analysis for large, international donors. As highlighted in previous sections, major donors—particularly bilateral donors from OECD countries—have a significant role to play in shaping the conditions in favor of localization. Nearly every research paper on localization concludes with recommendations for donors; there are too many specific, individual recommendations to consolidate into a single paper. Instead, this study draws on its interviews and the most recent HPG literature review to highlight recommendations for donors in three key areas:

1. **Funding humanitarian projects and programs**

2. **Investing in an enabling environment**

3. **Non-funding-related recommendations**

It is worth noting that, although some of these recommendations could also be applied to other actors in the humanitarian system (e.g., national governments, private philanthropy, UN agencies, etc.), these recommendations were all solicited in terms of what changes large, international donors could make to further support the localization agenda.

5b. Direct Funding Reforms

Given that both the literature and interviews for this study identified local actors' lack of access to quality funding as one of the primary barriers to localization, it is not surprising that many recommendations focus on the ways large, international donors could fund humanitarian actors to implement projects and programs. The following section lists recommendations from key informants, roughly in order of the frequency with which they were cited.

- **Make more direct, flexible, and longer-term funding available for local actors:** As in the literature, there was a broad general call from key informants for more direct funding for local actors and for that funding to be higher quality, more flexible, and longer term. Higher quality funding means ensuring that local actors have access to funding that allows them to cover core costs, manage risk, and invest in their own capacity. In terms of more flexible and longer-term funding, there was a sense that local actors are not just copies of international actors; they function in their own unique ecosystems of community response and accountability and therefore require different kinds of funding. A more nexus-informed approach to funding local actors may be more appropriate for many local humanitarian actors.

- **Make the proposal process more inclusive:** Many key informants suggested that the request for proposals (RFP) process could be modified to become more inclusive of local actors. Recommendations include circulating RFPs in local

languages; introducing RFPs that are just for local actors (or even marginalized subgroups, such as women-led organizations); and building in more time during the proposal process for international and local partners to consult each other and the crisis-affected community (Interviews 18, 25, 28).

- **Address risk management barriers throughout the funding process:** Compliance requirements and risk aversion are significant issues in nearly every step of the funding process—from the proposal stage through the awarding and evaluation of contracts. In the literature, risk management is widely recognized as a barrier to localization (Barbelet et al., 2021); it was also cited by several key informants, including a donor representative (Interviews 2, 22, 24, 59). Within their existing legal constraints, donors may need to seriously re-evaluate how risk aversion, risk management, and risk transfer affect the funding of local actors and make adjustments accordingly.

- **Provide incentives for intermediaries to support localization:** There was a recognition that it may take time for systems to change in a way that allows local actors to access more direct funding. In the meantime, many key informants emphasized that donors could put in place conditions, benchmarks, and incentives for international organizations that pass funding on to local groups (Interviews 3, 4, 8, 11, 16, 18, 20, 27, 28, 31, 37). For example, recommendations include: establishing indicators in project and proposal evaluations that focus on partnership quality; encouraging or incentivizing international intermediaries to sign on to voluntary localization commitments like Charter4Change (or establish their own); establishing minimum overhead rates for local partners; including sections in project proposals where international organizations need to justify their complementary role to existing local capacities, etc. This view is consistent with the most recent study on intermediaries, which emphasizes the importance of establishing greater incentives for and account-

ability from international intermediaries to help promote institutional change (Lees et al., 2021).

There was a particular emphasis on establishing incentives or benchmarks and awarding "points" for incorporating issues related to localization at the proposal stage. One key informant who has worked in both local and international humanitarian organizations shared that, "benchmarks at the proposal stage could change a lot because it forces the INGO's hand, and that's what you need to do." However, this individual also expressed the importance of anticipating and mitigating any unintended consequences that might arise from these conditions and incentives (Interview 18).

- **Fund consortia with localization in mind:** Given the recognition that it may take time to reform funding systems such that more and better-quality funding is directly available to local organizations, several key respondents also cited the importance of consortium funding as an important bridge to localization (Interviews 14, 16, 25, 29, 30, 34). Key informants representing donors, INGOs, and local NGOs all mentioned consortia as a way of "getting around" capacity limits and restrictions. However, one Bangladeshi women's organization pointed out that consortia can also replicate the same problematic power dynamics that subcontracting partnerships generate. Thus, consortia should be arranged in ways that support more equitable arrangements and are led by local actors (particularly those that may be marginalized, like women's groups) (Interview 24).

5c. Investing in an "Enabling Environment"

Interestingly, many key informants were more interested in the role large international donors could play outside of changes to direct humanitarian project funding structures. Namely, there was significant interest in donor investments in processes, structures, and services that could help create an "enabling environment" for localization. Typically, this means identifying the context-specific barriers in each country and building on context-specific opportunities related to how localization is defined and prioritized in that country. Ultimately, for many, the localization agenda is fundamentally about building and transforming humanitarian structures in countries that receive significant international humanitarian assistance.

Investing in Local, National, and Regional Coordination

- **Investing in local coordination and networking platforms:** There is broad agreement among key informants about the critical need to invest in strengthening local networking, organizing, and coordination platforms (Interviews 7, 8, 16, 17, 28, 35). In many places, civil society groups already work in affiliations or networks; these structures can be reinforced or supported so they have the capacity to pivot and coordinate humanitarian action when crises arise.

> "We always think about going through internationals, and they identify the locals, but there's already [structures] there, these are existing networks and civil society platforms. Donors could plug in and reinforce things in those directions."
>
> — Researcher based in the Global North

In addition, local and national coordination structures focused specifically on humanitarian interventions can also be reinforced, strengthened, and even decentralized. One INGO representative noted that the organization's local partners requested funds to strengthen their existing platforms, and, within the scope of the INGO's budget, the amounts involved were not substantial (Interview 8). There is evidence in the literature that leveraging existing networks—and reinforcing their strengths and capacities before or between crises—is an important tool for effective and locally led humanitarian action (Kilby, 2008; Robillard et al., 2020; Stephen, 2017).

- **Investing in regional coordination mechanisms:** In addition to supporting national and more decentralized local coordination platforms and networks, several key informants mentioned the importance of investing in regional humanitarian coordination mechanisms (Interviews 12, 17). The roles of the Association of Southeast Asian Nations (ASEAN), the Caribbean Community (CARICOM), Pacific Island networks, and other regional groups in the humanitarian space has gained increased recognition in recent years (Centre for Humanitarian Leadership Conference, 2021). Regional structures for humanitarian assistance may be able to provide the extra capacity implied by the Grand Bargain definition of localization (which calls for aid to be "as international as necessary"), while potentially facing fewer issues related to access, language, contextual awareness, timeliness, and colonial power dynamics.

Investing in Different Forms of Capacity

- **Investing in non-project-specific capacity building:** It is widely recognized that current "capacity building" efforts are too one-off in nature and tied to the specific project goals of international sponsors. As a result, they do little to support the priorities, strategies, effectiveness, and sustainability of local humanitarian actors. Assumptions about whose capacity matters and what capacity is also impact "capacity building" efforts. Key respondents recommend that donors: take a broader view of capacity; ask local humanitarians what capacities they believe they have and need; more objectively map the capacities of both international and local actors in specific crises; and work with stakeholders

to develop capacity building programs that are independent of projects based on context-specific priorities (Interviews 2, 4, 5, 20, 23, 28, 31). This approach could even involve investing in professional training and university programs in countries where they are not currently available to provide training for a future generation of humanitarian professionals.

> "It is a recent program to develop humanitarian master's programs. So definitely the ultimate base of this program would be the university, but that can't happen overnight. So, it could be started as a professional institution...dedicated to it. It's not an NGO project, not a development project, but have dedicated institutions that work on skill building of local aid workers."
>
> — Policy researcher based in the Global South

- **Investing in third-party support for compliance:** Given the challenges many local actors face around meeting the compliance requirements of major donors, the concept of third-party support services for compliance has been increasingly discussed in the sector. Even in the U.S., many small nonprofits do not have the core funds, staff, or long-term funding to support core administrative functions such as human resources, accounting, and other forms of compliance. They outsource these services to third-party organizations that specialize in supporting nonprofits. Recently, several groups have begun to explore whether similar services or structures could be established to support local humanitarian actors in different countries (Interviews 2, 30, 59).

- **Investing in domestic response capacities:** In addition to capacity recommendations focused on civil society organizations, several key informants brought up the importance of continued investments in state capacities for national disaster management (Interviews 12, 16, 59). While support to national disaster management structures is typically related to "development"

or "disaster risk reduction" programs, this recommendation points back to an acknowledgement that the state is perhaps the ultimate actor for ensuring successful localization. This perspective has been reinforced in the literature; several studies have shown that local humanitarian responders want their governments to be more technically adept at leading and coordinating humanitarian responses (Robillard et al., 2020).

Investing in Alternative Funding Structures

- **Investing in pooled funds:** Like consortium funding and increased conditions on intermediaries, pooled funds are seen as important bridges to the creation of an enabling environment for funding local actors (Interviews 4, 5, 6, 8, 20, 21, 27, 30, 31). However, pooled funds need to be designed with the specific aim of diversifying who can access funds, and ideally with leadership from national and local organizations (or even local foundations and philanthropists). Over time, pooled funds could shift to become more permanent funds that are managed by local civil society platforms, philanthropy networks, or domestic relief agencies.

- **Investing in "alternative intermediaries":** Given the concerns and constraints around equitable partnerships with international actors and recognizing the political and logistical concerns that donors face around direct funding, several key respondents recommend that donors identify and work with intermediaries from the Global South or, more specifically, the crisis-affected country (Interviews 3, 16, 30, 36, 59). The logic here is similar to that for investing in pooled funds. However, this structure would involve a single donor and intermediary as opposed to many donors and an intermediary, which could provide an individual donor with greater visibility and supervision. The advantage of switching to intermediaries in the Global South would be to disrupt some of the problematic power dynamics that are associated with intermediaries based in the Global North.

- **Investing in local philanthropy:** One area of "societal capacity" that could benefit from more investment is that of local philanthropy and domestic humanitarian funding. Until there is a diversified funding base for humanitarian action—in particular, one that includes funding sources close to the affected areas—there is a sense that funding-driven global power imbalances may never be addressed. Several key informants, ranging from researchers to donors to people working in local philanthropy, noted the importance of strengthening ongoing efforts to identify, organize, and strengthen the technical capacity of local philanthropy and domestic donors in countries that are typically considered "aid recipient" countries (Interviews 2, 14, 23, 35, 37).

Investing in the Amplification of Local Voices

- **Investing in local research:** As noted previously, there is significant potential for universities and researchers based in and connected to crisis-affected areas to carry out more of the research related to localization. Currently, the vast majority of research on localization—and on the humanitarian and development sectors in general—comes from institutions based in the Global North. Several key informants highlighted the importance of local institutions and researchers in exploring, understanding, and highlighting diverse and indigenous knowledge systems that can reinforce more effective and locally led humanitarian action (Interviews 13, 17, 29).

- **Investing in local participation in global forums:** As noted earlier, many global forums on localization continue to be dominated by voices and institutions based in the Global North. Some key informants mentioned that local actors are gaining greater access to local and national coordination and decision-making platforms, but they still face significant challenges in terms of accessing international or global forums (Interviews 25, 31). When local actors can participate directly in global forums, their impact can be significant. (See following quote.)

> "I asked [a colleague] why localization is more successful as compared to before. His position was that now our voice is heard internationally, because we can now communicate directly to the international forums, to the global decision-making forums, and we do not need INGOs in country to communicate our voice… Having a seat on the table at the international forum… this makes INGOs more accountable, and this also enables us to present our views directly."
>
> — Policy researcher from the Global South

5d. Recommendations not Related to Funding

Many comments about the ways large, international donors could better support localization were not directly related to funding. These recommendations, outlined below, focused more on relationships and institutional factors

> "I would like to take [the donors] to talk to the women in an Afro-Caribbean community… That will change the whole system, because they have the resources, capacity, and power to really produce the evidence on localization that is the model of transformation… [The donors] have huge potential. If they do it well, it could be beautiful—it could reverse 40-50 years of bad practice."
>
> — Director of an NNGO in the Global South

- **Listening to and building closer relationships with local actors:** One of the most common recommendations from key informants involved the desire to see donors listen to local humanitarian actors and build more direct relationships with them (Interviews 3, 8, 12, 13, 15, 16, 23, 28, 30, 56). This was considered important in terms of having donors understand the realities, strengths, and constraints of diverse local actors in each individual context, and how this would allow donors to make more evidence-based,

context-specific, and bottom-up policies. To achieve this, donors need to have an increased, sustained, and decentralized presence in crisis-affected countries (Interviews 7, 23, 28).

- **Closer collaboration and coordination among donors:** Another commonly mentioned recommendation was that donors could, and should, be working more closely together to advance the localization agenda. There was particular emphasis on the leadership role the U.S. can play given its sizable presence in the humanitarian sector.

> "Where are [donors] best placed to support change, where do they have the most power? If they decide it's a strategic priority, they have a huge amount of influence in the donor system more broadly. If they are perceived to be doing that by other donors, that is a huge driver for other donors to collectively get on board and to collectively advocate among donors."
>
> — Researcher for a policy group based in an OECD Country

One frequently cited and specific area for donor coordination is harmonized due diligence; it was emphasized as a key to helping local actors integrate more fully into the existing humanitarian funding system (Interviews 2, 8, 16, 19, 20, 21, 22, 31, 36). This is not a new concept; in fact, reducing administrative barriers and creating simplified or shared reporting templates were part of the Grand Bargain. There are many ideas about ways to achieve greater coordination and collaboration, including online "partnership portals," a form of LinkedIn for local NGOs, and simple mutual vetting. However, the importance of coordination goes beyond harmonized due diligence; unless donors can do more to communicate, collaborate, and coordinate among each other, local humanitarian actors will likely fall through the cracks of different localization initiatives (Interviews 2, 8, 11, 17, 33).

- **Internal systems review and capacity building:** Several key respondents recognized the structural limitations donors face when it comes to implementing the reforms that localization requires, particularly with respect to direct funding. These key informants (including representatives from the Global South and OECD donors) recommend that donors invest time and resources in identifying their own internal barriers and developing capacity building plans to overcome them (Interviews 24, 30, 31, 33). Potential areas to address include identifying bureaucratic processes that could be simplified; piloting new funding and partnership arrangements; breaking down internal administrative siloes (particularly between development and humanitarian branches); increasing grant management and field staff; etc.

- **Recognition and non-financial incentives:** While many key informants cited the importance of incentives and conditions in project implementation agreements that support localization, non-financial incentives were also mentioned (Interview 28). Publicly acknowledging the good work of key local actors and platforms, international intermediaries, and even other donors, can lend visibility and credibility to those making a stand for and pioneering effective practices. Even without an immediate financial benefit, this type of reputational incentive can be a very powerful motivator for institutional change (Interview 11).

6. Conclusion and Final Notes

Summary of key points:

- Localization is, in essence, a context-specific endeavor; as such, all related policies need to be based on deep research in, engagement with, and accountability to actors in that context.

- Many local actors in humanitarian crises are involved with a diverse set of issues; therefore, there is significant overlap between the "triple nexus" agenda and the localization agenda.

- Ongoing localization research needs to engage a more representative and diverse set of researchers and work to minimize language barriers in knowledge sharing.

Context Specificity

This document aims to present a global overview of the localization "landscape," but it should be made clear that, just as there is no single humanitarian "system," there is not a single localization agenda. Even if one universally accepted set of goals and indicators for what localization does or should mean existed, **there would not be a universal set of reforms, policies, or programs that would work to achieve localization in every context.** Dozens of factors influence what localization may look like in each context, including, but not limited to: type of crisis; physical geography; governance environment; civil society environment; regional context, and history and current presence of international actors.

The localization literature is composed primarily of context-specific case studies, mostly from a small set of countries. For this report, we undertook a "deep dive" in several countries and revisited cases from earlier studies by the Feinstein International Center and noted what localization means or should look like in each context. The results informed the broader landscape report, but the distinctions between them are worth revisiting.

In countries with violent protracted crises, security risks and access concerns have pushed many international organizations out of the operational space,

leaving local organizations to absorb the risks with limited resources. Many local actors in these high-risk spaces are looking for the fundamental, concrete localization reforms promised in the Grand Bargain, decentralized in a way that recognizes the vast diversity of their countries. In some contexts, case studies noted the strong presence, capacity, and organization of local humanitarian actors, but they were wary of the increasing state role in limiting the humanitarian space for both national and international actors; in other cases, many local actors are aware of the localization agenda and are using it to advocate for themselves in different spaces (Howe et al., 2019; Robillard 2020).

In Haiti and Honduras, on the other hand, many local actors consulted for the study are unaware of the localization agenda; even translating the term into local languages proved challenging. In Haiti, following the experience of the heavily internationalized 2010 earthquake response, key informants knew largely what they do not want to see; there were strong narratives about wanting the state and local civil society actors to assume more active leadership of the humanitarian response. In Honduras, however, there was such strong skepticism and disillusionment from past crises that there was little faith in any actors—be they international or national, from the state or civil society.

Given these vastly different realities, extrapolating to the myriad countries that experience humanitarian crises, and even among the several dozen countries that receive a fair amount of international humanitarian aid, it is important to emphasize that **there is no "one size fits all" approach to localization.** The vision of what localization is, who local humanitarian actors are, the role of the state, the role of international intermediaries, and even the role of large international donors, are all inherently context specific. Therefore, the reforms necessary to support localization are also context specific. For example, Indonesia's policy that bars international actors from any direct intervention may not be appropriate in conflict-affected countries with severe restrictions on civil society. **However, the complex and context-specific nature of localization should not be used as an excuse by those with power to say, "it's too complicated," and maintain the status quo.** Rather, these complexities should be utilized to motivate a deeper engagement with crisis-affected countries, greater investment in context-specific research, a fundamental commitment to listening to local humanitarian actors and crisis-affected communities, and a practice of policymaking informed by those data and voices.

While context is essential to the discussion around localization, many of this report's findings are applicable more generally, and they go beyond the well-known 25% marker for direct international funding to local organizations. These findings include:

- Local action to protect or assist people caught in conflict or crisis should be valued, and, at a minimum, outside intervention should avoid undermining or instrumentalizing local action.

- While acknowledging all constraints, there is more than enough evidence to support partnerships that are equitable, capacity building that recognizes and meets the priorities of all actors, and more inclusive coordination mechanisms.

- Improving intermediary accountability, local access to mechanisms for funding and decision-making, and coordination among donors is an imperative across nearly all contexts.

The nature of the enabling environment may vary, but the opportunity to identify and address constraints can be pursued in most contexts.

Links to the Humanitarian-Development-Peace Nexus

The FIC team recently produced another landscape report for BHA that addressed the "triple nexus" of humanitarian action, development, and peacebuilding. There are many explicit and implicit links between this report and the "triple nexus" report. Donor agencies and, to a large extent, INGOs may have explicitly differentiated objectives, and they may also have funding windows or operational departments that separate development programming from humanitarian action (and they may or may not deal with the peacebuilding question at all). Conversely, local organizations focus on what is happening locally. If there is a humanitarian emergency, a local organization may operate as a humanitarian actor; but that does not necessarily define how the organization views itself, nor does it define all its actions. Many local actors, almost by definition, are "nexus" actors.

Donors and international agencies could learn from local actors in this sense. However, at the official policy level, there is little interaction between the "nexus" and localization agendas. Key donors could do more to integrate these two agendas, which would benefit them both.

Further Research

More research is needed to further understand and unpack some of these localization dynamics. Outside actors have only begun to understand the dynamics around local social networks and mutual aid groups. In addition, the roles of private sector actors, diasporas, and other distinctly "non-humanitarian" actors, such as armed groups, remain poorly understood. There will be a continued need to track the variety of experiences—both formal and informal—of the diverse local actors outlined in this document.

In addition, the who and how of localization research needs to be expanded and diversified. Research institutions based in crisis-affected countries and researchers who identify as being from the Global South, or the Global Majority, need to be given greater opportunities to shape the research agenda and produce research on this topic. More resources need to be dedicated to translating key evidence into and from different languages to ensure that research and knowledge that is not in English, or other colonial languages, is seen and valued, and that research in English and other colonial languages is accessible to different populations. In general, research on localization needs to continue to center on, listen to, and be accountable to both local humanitarian actors and crisis-affected communities to be more equitable and effective.

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