

Background and Context

In 2021, the Bureau of Humanitarian Assistance (BHA) of USAID commissioned the Feinstein International Center at Tufts University to undertake a series of 'landscape papers' to explore certain key issues in the humanitarian research space. One of the issues identified as a priority by BHA was that of the "localization of humanitarian assistance." Localization is a loosely defined agenda meant to correct for historic and systematic exclusion and marginalization of actors from crisis-affected countries. often referred to as "local actors," in the structures of international humanitarian response. The agenda was somewhat formalized through the Grand Bargain agreements that came out of the 2016 World Humanitarian Summit, which emphasized increasing funding to local humanitarian actors, more equitable partnerships between local and international actors, more integrated coordination efforts, and increased capacity building for local actors.

Many issues related to the localization of humanitarian assistance, including who is a local humanitarian actor and what reforms are seen as necessary to achieve it, are inherently context specific. Therefore, in shaping the broader landscape study, the study team decided to include four case studies that would provide "deeper dives" into four different contexts to provide context-specific insights into key aspects of the localization discourse. Each study worked with researchers who were from or

deeply connected to the countries being studied and engaged with a broad range of stakeholders in those countries. The countries included Uganda, South Sudan, Haiti, and Honduras. The objective of these cases is not to provide a comprehensive or definitive take on localization in each context; rather, it was to provide additional nuance to the concepts being discussed in the broader landscape paper and illustrate how these differ across contexts.

Methods

Key informants were purposefully selected to represent a variety of viewpoints and geographic areas across Uganda. The study team spoke with total of 20 key informants between June and October 2021, many of whom had experience working for a variety of organizations in their careers. These key informants had experience working for local or national NGOs, international NGOs, government, and one had experience as an academic, 40 percent of the key informants were women. Interviews were conducted by telephone or Zoom. Interview transcripts were coded using NVivo software for qualitative analysis. The 20 key informants in this study are not necessarily representative of the population of Uganda, nor of the specific sub-set of stakeholders who are more deeply engaged on questions on humanitarian action.



The Humanitarian Context

Refugee Crisis

Uganda faces multiple humanitarian crises ever year. Over the last several years, the country has experienced a large influx of refugees from the neighboring countries of South Sudan, the Democratic Republic of the Congo (DRC), Burundi, and Somalia, making Uganda Africa's largest refugee-hosting country. Most of these refugees are forced to flee their countries of origin due to war, conflict, political instability, and human rights violations. Uganda's compassionate, open-door refugee policy also facilitates the flow of refugees into the country.

Today, Uganda hosts more than 1.5 million refugees: 61 percent are from South Sudan, 29 percent from the DRC, 3.4 percent from Burundi, and 3.2 percent from Somalia. There are also refugees from Rwanda, Eritrea, Ethiopia, and Sudan, among other countries. Refugees are hosted in 30 settlements across 12 districts in Uganda. Most refugees are in the West Nile (the northwest), the southern side of Western Uganda, and parts of Northern Uganda; a few urban refugees are in the capital city, Kampala.¹

The increased number of refugees in Uganda has strained local resources and become a humanitarian concern for the government and its development partners. In 2017, Uganda hosted the Solidarity Summit on Refugees in Kampala, and the country requested USD 2 billion from the international community to help provide essential services for refugees and their host communities. The summit raised about USD 350 million. Today, funds are still needed for refugee assistance.

The refugee protection policy in Uganda is considered progressive and among the best in the world. The country has implemented several initiatives to address its refugee situation. Of note is the Refugees Act (2006), which calls for a conducive environment for hosting refugees. For example, the country's Comprehensive Refugee Response Framework (CRRF) supports an inclusive approach to refugee hosting, including refugee rights to freedom of movement, to work, to establish businesses, and to access public services like education and health care. In addition, instead of living in refugee camps, refugees are hosted in settlements—land plots are provided to each family promoting self-reliance and resilience.² Refugee response is also addressed in Uganda's second National Development Plan through the Settlement Transformative Agenda (STA). The STA recognizes the impact of forced displacement on host communities and supports these districts through investments in infrastructure, livelihoods, peaceful coexistence, and environmental protection.³

Uganda introduced the CRRF in March 2017. It focuses on five areas: (1) admission and rights, (2) emergency response and ongoing needs, (3) refugee resilience and self-reliance, (4) expansion of third-country solutions and complementary pathways (such as scholarships and student visas), and (5) voluntary repatriation.⁴ The CRRF builds on the STA by promoting the integration of a humanitarian response alongside the refugee response in long-term local and national development plans. Thus, all relevant ministries are expected to develop and integrate a refugee response into their local and national development plans. The CRRF is governed by a Steering Group, which includes representatives

¹ See https://data2.unhcr.org/en/country/uga.

² Felix George Ojok Arim. 2019. "Localizing Humanitarianism. Participation of Local Actors in the Refugee Response: A Case Study of the Adjumani District, West, Nile, Northern Uganda." MSc International Development Studies Thesis, Sociology of Development and Change. Wageningen University and Research, Netherlands. Accessed on Nov. 11, 2021 at https://edepot.wur.nl/509316

³ Arim, "Localizing Humanitarianism." See also: Chris Degnan and Anita Kattakuzhy. 2019. "Money Talks: Assessing Funding Flows to Local and National Actors in Uganda," Development Initiatives and Oxfam. https://heca.oxfam.org/latest/policy-paper/money-talks

⁴ UNHCR. 2017. "Comprehensive Refugee Response Framework: Uganda."

of the Government of Uganda's line ministries and departments, local government, development and humanitarian donors, United Nations (UN) agencies, national nongovernmental organizations (NGOs), and international nongovernmental organizations (INGOs), the private sector, international financial institutions, and, notably, refugees themselves. Moreover, the CRRF mandates that all refugee response allocations are distributed such that 70 percent goes to the refugee community and 30 percent to the host community.

From March to October 2018, the government implemented a refugee biometric verification system for refugee registration which involves taking the refugee's data, including fingerprints and photograph. The biometric verification system helped to (1) address challenges around transparency and accountability in the refugee response, and (2) ensure accuracy in the refugee counts the Office of the Prime Minister (OPM) uses for fundraising and programming.⁵

Other Humanitarian Emergencies

In addition to the refugee crisis, Uganda grapples with other humanitarian emergencies, including violence, human rights abuses, reduced civil society engagement, disease, and extreme weather impacts. For example, flooding from heavy rainfalls has negatively impacted food security and livelihoods by destroying homes and blocking roads, thereby slowing or obstructing service delivery and emergency responses. Ongoing armed violence and cattle rustling in the Karamoja subregion (the northern part of Eastern Uganda) also pose a serious risk to lives, livelihoods, and food security for the local population.

The country also faces an increased risk of diseases like malaria, cholera, and the current Covid-19 pandemic, all of which compound the country's already challenging humanitarian situation. For example, government restrictions aimed at containing the spread of Covid-19 have impacted livelihoods, especially for informal workers and casual laborers who rely on daily work or wages to make ends meet. In particular, the restrictions on movements across districts and local motorcycle taxi locally known as "boda-boda" that employ many young men in urban spaces and are also used for movements across towns greatly affected local businesses. Moreover, the closure of public spaces such as markets that absorb most informal workers had a huge impact on people's lives and livelihood. Exacerbating the situation, poor households have been at a greater risk of contracting Covid-19 because they lack the necessary facilities to observe common mitigation measures (such as access to clean water, masks, and social distancing).

Role of NGOs

Together, these factors overwhelm the country's ability to provide a sufficient humanitarian response. Local and international actors try to fill the gap through different but entwined interventions to provide food, shelter, education, health care, basic services like water and sanitation, security, and livelihood support, among other services.

In this context of increasing humanitarian need, there was a rise in the number of NGOs operating in Uganda over the years. At one point, over 14,200 organizations were registered with the National Bureau for NGOs (NGO Bureau).⁶ However, despite their important role, the number of registered NGOs fell to 2,118 after a government review in 2019. Most

⁵ Degnan and Kattakuzhy, "Money Talks."

⁶ William Niba, "Uganda Outlaws Thousands of Organisations Running Unscrupulous Operations," Radio France International (RFI), Nov. 16, 2019. Accessed Nov. 11, 2021 at https://www.rfi.fr/en/international/20191115-uganda-outlaws-thousands-ngos-operating-country. Speaking to an RFI reporter in Uganda, the Executive Director of the National NGO Forum acknowledged that only 2,118 NGOs, out of a total of 14,207 registered, were cleared to continue operations.

Alon Mwesiga. 2019. "Uganda Bans Thousands of Charities in 'Chilling' Crackdown: Government Critics Fear Purge of Sector as more than 12,000 Organisations Lose Registered Charity Status." The Guardian, Nov. 21. Accessed Oct. 20, 2021 at https://www.theguardian.com/global-develop-ment/2019/nov/21/uganda-bans-thousands-of-charities-in-chilling-crackdown. Also see Niba. "Uganda Outlaws Thousands." Accessed Oct. 2021 at https://www.rfi.fr/en/international/20191115-uganda-outlaws-thousands-ngos-operating-country

of the organizations that were instructed to stop operations were local groups (as opposed to large, INGOs), allegedly due to their inability to renew their operating licenses in time. Many organizations remain under scrutiny, and several NGO offices experienced break-ins with no police reports filed. In addition, some NGOs have had their bank accounts frozen, and some NGO leaders face legal charges over their operations.

Space for civil society and NGOs has become more restricted in Uganda under the 2016 NGOs Act, which requires declarations of funding to and approval of workplans from the NGO Bureau. In August 2021, the NGO Bureau announced the closure or suspension of 54 NGOs that worked on issues related to transparency, accountability, or

governance in Uganda; lack of compliance and other irregularities in their operations were the reasons cited for these closures.⁸

There is also a new cabinet proposal to vet all donor support coming into Uganda. Under this proposal, all projects and programs implemented by development partners will require cabinet approval and sign-off from the finance minister prior to implementation. These changes would make it harder for many international and local actors that implement a range of programs to continue their operations. This development generates fear among local and international actors who implement a range of programs, including humanitarian assistance. The proposed changes will limit their ability to address local challenges and needs.

Defining Localization

Although various actors agreed to localization in the Grand Bargain,¹⁰ the definition of localization is unclear. In Uganda, for example, different local and international actors hold differing views about localization.

Local Perspective

In one view, some local actors understand localization and the process through which aid is made more effective by building local capacity to deliver assistance. This comes from a recognition that local and international actors may have complementary expertise, with internationals tending to have greater administrative and technical capacity, and local actors having greater contextual and operational capacity. This view holds that if there is mutual capacity strengthening and exchange, humanitarian responses can be more effective. In sum, in this view,

localization is about shifting power from international to local actors to better serve the crisisaffected population at the center of a response. Specifically, as international actors wind down their operations, local actors will have built the necessary capacity to take over the response, address the continuing impact of the crisis, and link their work to long-term development or peacebuilding goals.

Another view of localization among local actors emphasizes the importance of a humanitarian response that recognizes and elevates local voices and priorities. In this view, any humanitarian response should reflect local priorities, and solutions should come from the local population. Any humanitarian response should be as localized as possible; it should engage local actors at all stages of the response, including assessment, planning, design, implementation, and monitoring and evaluation. By engaging local actors based in the affected

⁸ Ronald Musoke. 2021. "Government Clamps Down on 54 NGOs." *The Independent*, Aug. 23. Accessed Oct. 20, 2021, at https://www.independent.co.ug/govt-clamps-down-on-54-ngos/

⁹ Franklin Draku. 2021. "Government Moves to Control Donor Funds, Projects." *Daily Monitor*, Sept. 28. Accessed Oct. 2021 at https://www.monitor.co.ug/uganda/news/national/govt-moves-to-control-donor-funds-projects-3565442

¹⁰ An agreement among donors and humanitarian organizations to "get more means into the hands of people in need and to improve the effectiveness and efficiency" of humanitarian aid. See: https://interagencystandingcommittee.org/about-the-grand-bargain

community or region, this approach helps reduce costs, incorporate local priorities, and ensure that a response is context-appropriate, timely, and, therefore, more efficient and effective. Importantly, this approach to localization contributes to shifts in power, decision making, and influence from the international to the local level, helping ensure a sustained impact. However, despite working alongside international actors under subcontracts, some local actors noted that they were not recognized or acknowledged in final project reports, negating their contributions and visibility.

International Perspective

Both local and international actors observed that different international actors define localization differently based on their own needs or priorities.

For some international actors, localization means contracting local groups or individuals to supply the goods needed for a humanitarian response. In practice, this means that local individuals, companies, or organizations that meet the international organization's procurement requirements can benefit from these opportunities. However, the majority of the local population and local enterprises cannot meet the required standards and are left out. This approach to localization risks reinforcing existing inequalities and power dynamics at the community level.

In another view, some international actors understand localization to mean employing more local or national staff at their organization's country or regional offices. This may include hiring people from crisis-affected populations or the surrounding areas, such as refugee host community members. However, due to the local population's relatively low skills, experience, expertise, and education levels—especially among crisis-affected populations—international organizations find it hard to employ them. This is due, in part, to the relatively high hiring standards and job requirements of international organizations. Most expert positions in international organizations are occupied by people from the Global North or from countries or regions with extensive experience in humanitarian responses, such as West Africa or Northern Uganda. Conversely, local residents are generally hired for junior roles or non-technical positions that offer few opportunities to make or influence decisions. In other words, international organizations tend to hire local individuals, including those from crisis-affected populations, for low-level and, often, manual jobs that do not require many skills or much expertise, such as interpreters of local languages for non-local staff, drivers, security guards, cooks, junior administrative positions, or casual workers.

Some international organizations define localization as working with local actors to deliver humanitarian assistance. This understanding of localization focuses on the advantages international actors derive from working with local actors, such as reduced aid delivery costs and greater access to the crisis-affected population. For example, international actors hire local residents as interpreters of local languages to ease and facilitate the work of their non-local colleagues or to help the organization navigate local dynamics. Most of these collaborations between international and local actors are project- or activity-based, without any focus on strengthening local capacity. Notably, these collaborations do not focus on equality or the goal of eventually transferring power and influence over decision making and resources to local actors.

In yet another view of localization among international actors, the focus is on international actors stepping back to let local and national actors gain more power and influence over funding and decision making, as well as greater autonomy and space to operate in a humanitarian context. The emphasis here is on strengthening the capacity of local actors to deliver humanitarian assistance on their own. In this view, international actors should focus on strengthening local capacity so that local actors can attract and sustain funding for their work. Partnerships between international and local actors should be built on respect, equality, and a shared understanding of their respective roles and responsibilities in humanitarian assistance. Local actors should also be given a greater voice and more space in coordination mechanisms to articulate their own priorities and needs—without the fear of being overshadowed by international actors or having their relevance dismissed. Instead of a threat, the growth of a local actor becomes an important achievement for the

international actor. In this view of localization, there is a stronger focus on involving local actors in the humanitarian response, and more power and opportunities devolve from international to local actors. This approach requires more sacrifice from international actors; in practice, it is not happening much.

Finally, some international actors define localization as a local presence in the country of operation. In other words, registering an international organization in the country of operation is seen as localizing it. This is the preferred approach of many INGOs:

each country office represents a particular country of operation. This generally involves minor actions, such as adding the country's name at the end of the organization's name—for example, Save the Children in Uganda—to call the organization local or localized. However, an INGO that is registered locally and has an in-country presence still enjoys the benefits of international brand recognition, expertise, affiliations, and connections, and it cannot be compared fairly with a local organization that lacks most or all of these attributes.

Defining Local

As with definitions of localization, there are varying views of what constitutes a "local actor." While some defined local actors as beneficiaries or crisis-affected populations, most respondents understood local actors to mean more established national or local groups or organizations, including community-based organizations (CBOs), faith-based organizations (FBOs), the media, the private sector, and government at all levels (local, regional, central). Informal groups for women, youth, the elderly, and local leaders in a refugee settlement were also mentioned, though less frequently, as local groups. Overall, this understanding of local actors risks focusing the localization discussion on large national organizations or INGOs with a national presence, eclipsing smaller, less visible, and informal groups and networks.

The definition of "local" is also contentious because there are different understandings of the term based on a group or individual's district, region, nationality, or other identities. For example, "crisis-affected" can have different meanings, including a refugee or a host community. These different understandings of what is local are partly embedded in the humanitarian system and can determine, for example, who receives assistance and who gets hired to distribute aid.

In this context, there have been some tensions between host communities and refugees regarding

access to humanitarian assistance. However, these tensions have largely been resolved through the CRRF and its proportional distribution of funds (70 percent and 30 percent, respectively) to refugee and host communities. Host communities have also expressed apprehensions about their role in a humanitarian response. For example, some respondents from West Nile, one of the host regions for refugees, expressed concern about the lack of opportunities for the region's local residents. Most humanitarian positions in the region were reportedly filled by individuals from the northern part of Uganda, who, given their own region's twenty years of armed conflict, have extensive experience with humanitarian work. Conversely, local West Nile residents were mainly employed in low-level positions.

In sum, what is considered "local" in Uganda is relative. Depending on the location, "local" can be at the national, regional, district, or even more local level—for example, a refugee settlement. Thus, the discourse around localization should include all the diverse levels and identities of local actors involved in humanitarian assistance. Some respondents suggest that "localization" and what is "local" should be defined based on the particular context of different humanitarian situations, and, for localization to work well, different milestones or indicators should be identified for different contexts, rather than a one-size-fits-all approach.

The State of Localization in Uganda

Funding Flows

In Uganda, the localization agenda gained momentum in 2016, following the signing of the Grand Bargain. As part of the preparations for the 2016 World Humanitarian Summit, consultations were held with local and national humanitarian actors in Uganda; they recommended greater investments in the ideas, skills, and capacity of local actors to achieve a more effective humanitarian response.

Since the signing of the Grand Bargain, some milestones toward localization have been achieved, but progress has not met the expectations of most local actors. Notably, progress is slow in terms of shifting power to and fulfilling commitments at the local level. For example, commitments to fund local actors are below the 25 percent level agreed to in the Grand Bargain.

According to a 2019 report on funding flows to Uganda for humanitarian assistance, local actors are not benefitting from these funds as much as their international counterparts. This is the case despite a significant increase in the total amount of humanitarian assistance to the country, which rose from USD 154 million in 2016, to USD 348.6 million in 2017, an increase of over 125 percent. During this same period, the share of both direct and indirect funding to local actors decreased from 13 percent to only 9 percent. Notably, direct funding to local actors represented only 1 percent of total funding during the review period. Furthermore, even though the absolute amount of indirect funding to local actors increased during the review period, the proportion of humanitarian assistance local actors received still decreased: from 13 percent in 2016 to 8 percent in 2017.11

The same 2019 study by Development Initiatives and Oxfam found that, from 2016 to 2017, only the Uganda Red Cross Society (URCS) and some national private organizations received any direct funding, and then for minimal amounts. This means that most local actors did not receive any direct humanitarian funding during this period at all. During the same period, most indirect funding went to the Government of Uganda (GoU), with smaller amounts going to the URCS and some national organizations. Specifically, the GoU received 62 percent of indirect funding in 2016; this share dropped slightly to 56 percent in 2017. The URCS share increased from 19 percent in 2016 to 24 percent in 2017.

Capacity Building

Most local respondents noted that a major shift in the localization discourse in Uganda started in 2016, when Oxfam in Uganda began implementing the Empowering Local and National Humanitarian Actors (ELNHA) project. This five-year project promoted a more equitable distribution of power and resources between international humanitarian actors and local and national actors. The ELNHA project is based on the premise that empowering Local and National Humanitarian Actors (LNHAs) to lead emergency preparedness and response activities will result in well-coordinated humanitarian responses and better served local and crisis-affected populations living in disaster-prone environments.¹³

A key respondent provided details about ELNHA. This project was divided into two phases. The first phase, carried out over three years, 2016–2018, focused on capacity assessment of and tailored capacity building for LNHAs. The Humanitarian Country Capacity Assessment (HUCOCA) was a key tool for this phase, used to understand local

¹¹ Degnan and Kattakuzhy. "Money Talks."

¹² Degnan and Kattakuzhy. "Money Talks."

¹³ Oxfam Novib. 2020. "Consortia of Local and National Humanitarian Responders in Uganda: Learning from the Three Years of Humanitarian Response by Local Consortia under the ELNHA Project." August.

actors' existing capacity for humanitarian response. This information was then used to inform the design of tailored capacity building activities. The project's capacity building component utilized various methodologies, including structured training sessions (by region), short-term courses at universities or learning institutions, and coaching and mentorship of LNHAs. Oxfam in Uganda identified and worked with a local capacity-building specialist who facilitated all the trainings with local actors over the three-year period. This tailored capacity building focused on institutional capacity (including finance, humanitarian, procurement, safeguarding, human resource, and child protection policies), organizational structure and capacity, early warning systems (EWS), and disaster preparedness, among others. Capacity building also addressed issues related to core humanitarian principles, the Core Humanitarian Standard, and other humanitarian standards such as Sphere—all important elements of effective humanitarian action.

The project's second phase, planned and implemented over two years, centered on the Humanitarian Response Grant Facility (HRGF). LNHAs applied to and received grants from the HGRF for humanitarian responses they designed. Between January 2019 and March 2021, four rounds of HRGF-funded responses were implemented in Northern Uganda, for a total of 17 locally-led responses, including 11 projects implemented through local consortia.14 The HRGF enabled local actors to apply the knowledge they gained from the capacity building phase; they acquired grant writing experience and established a track record of grant funding, two attributes that help organizations secure future funding. As part of their capacity building exercises, local actors learned the art of grant writing; some were then successful in securing direct funding from other international actors, including the U.S. Agency for International Development (USAID), the European Civil Protection and Humanitarian Aid Operations (EU/ECHO), the UN Food and Agriculture Organization (FAO), and the German Agency for International Cooperation (GIZ).

Coordination Platforms and Mechanisms

The ELNHA project also supported the creation of national and regional humanitarian platforms in the subregions of West Nile, Acholi, and Karamoja. Chaired by a local actor, these humanitarian platforms engage in advocacy to hold INGOs accountable for the localization commitments in the Grand Bargain and the Charter for Change. The platforms also coordinate local actors' activities in their different regions.

Respondents also reported increased local and international participation in various coordination mechanisms. In contrast to the period before the 2016 World Humanitarian Summit, some regional and national NGO platforms now exist. Chaired by local actors, national and regional humanitarian platforms for local and national organizations were established in 2018 to bridge the gap between their members and other humanitarian actors, such as international aid organizations and other donors. Through these platforms, local actors can influence humanitarian policies and practices at both the local and international levels.

For example, at the national level, a local representative sits on the CRRF steering committee. As noted above, this steering committee brings together representatives of various stakeholders from all levels. The local representative can then articulate local perspectives to a range of interest groups through the CRRF steering committee. Local actors can also better advocate for their own needs; some respondents noted that they are currently in conversations with the OPM to support the localization agenda by enforcing more and better partnerships between international and local actors.

Some respondents noted that local and international actors now participate in joint humanitarian platforms at the regional level as well. (For example, the West Nile refugee response.) This represents a big shift from the past, when international actors

¹⁴ Degnan and Kattakuzhy. "Money Talks."

did not participate in local coordination mechanisms. This joint participation has helped improve relationships between local and international actors and contributed to an increase in partnerships in which international actors subcontract humanitarian projects to local actors for joint implementation.

This increase in spaces in the humanitarian sector for local actors to share their views has led to improvements in local participation, even though local influence remains negligible. For example, localized coordination mechanisms help assuage the power dynamics and hierarchies that local actors face in centralized or national coordination mechanisms, helping encourage local participation. Similarly, a regionally based coordination mechanism can help address language barriers, which can hinder effective local participation.

In regions with active humanitarian responses and platforms, such as West Nile, some local actors have strengthened the capacity of other local actors. For example, local government coordination structures at the district and subcounty levels have been improved, and some previously inactive District Disaster Management Committees (DDMC) have reportedly been revitalized in Koboko, Arua, and Madi Okollo districts, West Nile region. The DDMCs of the three districts and some of the Subcounty Disaster Management Committees in the districts have been trained in disaster preparedness and response, and they now have functional disaster response plans in place. However, some respondents noted that the Disaster Risks Reduction (DRR) platforms in other parts of Uganda are, for the most part, inactive, weak, and non-functional, indicating that these platforms are only functional in districts with ongoing humanitarian responses.

The Government of Uganda continues to play an active role in coordinating humanitarian assistance. This is done through the OPM, which is responsible for disaster preparedness, disaster management, and the refugee response. The Refugee Desk Office (RDO) under the OPM coordinates and oversees

the refugee response and related operations. The RDO also chairs the refugee response program which involves both local and international organizations—and coordinates its implementation. Under the CRRF, the refugee sector working group is co-chaired by the OPM and the Ministry of Local Government; the latter's involvement at the leadership level helps promote more localized coordination of and responses to the refugee crisis. In addition, some existing government policies help support localization. These include the 2005 Constitution, which grants the central government responsibility for the refugee response; the 2006 Refugee Act, which mandates that the OPM is responsible for coordinating the refugee response; and the decentralization policy of 1997, which states that the planning and delivery of basic services is the responsibility of local governments and should be realized at the local level.15

Despite this progress, most respondents noted that the extent of localization's success is debatable, with most localization commitments existing largely on paper. For example, although the government promotes flexible partnerships for the refugee response to improve access and opportunities for local actors, local influence remains limited. Some noted that international actors with a refugee mandate and established funding wield power and influence over most other actors, including the national government. In addition, GoU restrictions on civil society limit the latter's work and remain a matter of concern among both local and international actors.

¹⁵ Degnan and Kattakuzhy. "Money Talks."

Contributing Factors and Barriers to Localization

Contributing Factors to Localization

- 1. Context-appropriate capacity building: Local respondents noted that Oxfam in Uganda's ELNHA project provided structured capacity building for local actors over an extended period (three years). Informed by local assessments, this training was tailored to each group's specific needs. The project helped local actors strengthen their institutional capacity (structures and policies) and develop technical expertise in humanitarian assistance. In addition, the project included start-up funding for local actors, helping them build the requisite funding track record needed to attract future funding. Indeed, most local actors that participated in the ELNHA project were later able to meet humanitarian aid standards and attract their own funding.
- **2. Humanitarian coordination platforms:** National and regional humanitarian platforms exist in different parts of Uganda. These platforms offer local actors a venue to engage in humanitarian action, voice their concerns, and strengthen and coordinate advocacy efforts around localization. When possible, these platforms also connect local actors with potential funding sources. In addition, they allow potential donors or international intermediaries to verify the existence of local actors and thereby instill confidence that funding and support reach their intended destinations. Importantly, regional platforms help ensure that local actors in remote and hard-toreach areas have an equal opportunity to participate in coordination mechanisms. Furthermore, regional representation in the national platform helps propel regional views to the national level, helping advance the localization agenda.
- 3. Increased partnerships: Today, since the Grand Bargain and start of the discourse on localization, there are more humanitarian partnerships between local and international actors. Oxfam in Uganda's ELNHA project and its capacity building efforts also greatly contributed to the shift in partnerships. Most international actors implement their humanitarian assistance programs through or with local actors. The ELNHA capacity building helped improve local capacity, thereby increasing international actors' faith in the ability of these local actors to carry out humanitarian assistance projects. This capacity building also helped some local actors develop the confidence to seek more rights and a greater voice in their partnerships.

However, concerns remain about the nature of these partnerships; for example, the role of local actors remains limited, and equality in partnerships remains debatable. In addition, partnerships are generally only with local actors that meet international standards and resemble international organizations; they tend to be larger and national organizations, a few of them were involved in the ELHNA project. For example, Community Empowerment for Rural Development (CEFORD), an organization from West Nile that participated in the ELHNA project, is now a UN High Commissioner for Refugees (UNHCR) partner in the refugee response. CEFORD also leads a consortium of several organizations, including INGOs. However, smaller local groups are still missing out on opportunities and are more likely to be in partnerships with unequal power dynamics. Thus, while there are more humanitarian partnerships, they do not all necessarily demonstrate a shift in power, decision making, or influence to the local level, and they do not necessarily meet local priorities and needs. These unequal partnerships are

- reinforced by the perception among some international actors who believe that local actors do not have the capacity to meet humanitarian standards or manage humanitarian actions. Unfortunately, such perceptions continue to perpetuate the unequal power dynamics that already exist in the humanitarian sector.
- 4. Recognizing local expertise: Local actors possess local knowledge and expertise about their particular context or region, including the social cultural and political dynamics that can affect the delivery of humanitarian assistance. Recognizing and incorporating this valuable local knowledge into the humanitarian response can help improve its appropriateness and effectiveness. Specifically, local actors know the social cultural dynamics of communities affected by humanitarian emergencies and are therefore best positioned to deliver assistance in a way that does no harm or hurts the social life of the community. In Uganda, for example, any livelihood response should correspond with the cultures of the affected people—their staple food, weather patterns, and planting seasons which local actors have a better understanding of. Similarly, some social cultural dynamics that might affect humanitarian programming can best be understood by local actors. For example, the South Sudan refugee response in West Nile subregion is appropriate, since they also share ethnic, language, and other social similarities with the people of South Sudan, helping to better inform the humanitarian response.
- respondents mentioned that EU/ECHO in Uganda has created a special fund that is intended only for local actors providing humanitarian assistance in Uganda. This removes competition with international actors for these funds and provides local actors with increased opportunities to access funds for humanitarian assistance. Direct donor funding like this also reduces the bureaucratic requirements that often accompany third-party funding or subcontracts to local actors. Importantly, lessons from this funding model can provide important insights for future donor funding to local actors.

- **6.** A consortium approach: Local actors have a better chance of obtaining funding when working in a consortium than when applying or operating as an individual entity. Indeed, most funding to local actors encourages a consortium approach in which local actors submit a joint application for funding with international partners or other local actors. Working in a consortium brings the diverse expertise and skills of member organizations together, bolstering the competitiveness of the funding application and spreading risk among the group members. By allowing donors to administer just one contract or grant, as opposed to managing numerous small grants to individual actors, the consortium approach can also increase the likelihood of funding, especially if international actors are part of the consortium. Of note, while the consortium approach is laudable, most consortia tend to be led by INGOs or large national or local organizations, replicating longstanding power dynamics. However, in at least one example cited by respondents, a local actor led a consortium for refugee response that included local and international actors.
- 7. Improved accountability: Increasingly, local actors are better equipped with the systems and experience needed to be accountable to both donors and affected communities. The joint monitoring of the humanitarian response involving community leaders, district-level and central government officials, and local and international actors greatly contributed to changes in the accountability culture of some local actors. Importantly, efforts to strengthen local capacity and the local role in humanitarian assistance (as part of the ELNHA project) were cited as major drivers of improved accountability among local actors. The ELNHA training introduced local actors to international humanitarian systems and standards, including those on financial management and reporting. It also helped local actors establish the necessary organizational structures to improve accountability and fund management, thereby reducing potential risks and mismanagement. Although challenges remain, improved accountability among local actors has led to more partnerships with international actors and increased opportunities with potential donors interested in direct local funding.

Barriers to Localization

- 1. No binding (legal) framework on localization:
 - There are several concerns about localization, with confusion about whether it is a policy framework or an agenda. Local respondents noted that there is no binding legal framework to support or regulate the implementation of localization. Although the purpose of localization is to support and empower local actors, global commitments have not been fulfilled at the country and local levels. In fact, some in-country INGO staff were reportedly unaware of their organization's global commitment to localization, making it difficult for local actors to engage with them or hold them accountable on the subject. The lack of a binding framework means implementation of localization is voluntary for organizations; they do not have to do anything. In the absence of a binding framework or guiding principle, even organizations that signed on to the localization commitment at the international level have no mechanism to enforce its implementation at the country or field level. Similarly, there are no responsible entities or mechanisms at the country level to hold actors accountable. The lack of a context-appropriate framework or guiding principles risks applying a generalized understanding of localization to different contexts, defeating the very purpose of localization.
- 2. Perceptions of weak local capacity: Some international actors question the local capacity to manage a humanitarian response and are thus reluctant to engage with local actors. In fact, some international actors reportedly say they believe localization cannot work in an emergency since the situation requires, among other attributes, ready resources, and capacity, which local actors do not have. One local respondent shared a view based on an interaction with an international actor: "...this is too much work for local actors and they don't have the expertise, skills, and ability to handle the refugee population." In most cases, international actors prefer to work

- with other INGOs rather than local actors. To illustrate, of the 12 UNHCR partners responding to the refugee crisis in West Nile in 2019, only two were local actors.¹⁷ Some international actors are reportedly skeptical of the capacity of local actors to meet international humanitarian standards, especially with respect to the financial accountability required with a large humanitarian response. They believe that only international organizations with established structures that comply with international standards can be trusted to manage such a response. As long as local actors are perceived to lack the necessary expertise and capacity, international actors will continue to lead and dominate humanitarian responses.
- 3. Lack of professionalism and founder syndrome: In a handful of cases, both international and some local actors raised concerns about the lack of professionalism among some local actors. Some of the local organizations employ their relatives or operate like a family business instead of a professional organization. Another challenge is related to "founder syndrome," where an organization's founder lacks the appropriate skills or expertise but insists on managing projects, creating tensions with staff and any partners. These tensions affect the organization's ability to retain skilled staff, particularly if they are a subordinate to an unqualified organization head. Even when they received training, some local actors resisted making the suggested and necessary institutional changes, thereby affecting their organization's ability to compete for resources and gain the trust of international actors. In the view of some respondents, these isolated phenomena among some local actors made it difficult for international actors, intermediaries, and donors to trust local actors in general. The poor performance of a few has become an excuse for some international actors to deny funding or partnerships to most local actors, frustrating efforts to localize humanitarian action. However, there is also a sense that local actors that benefited from capacity building support, such as that

¹⁶ Key Informant Interview EA 03. Jun. 18, 2021.

¹⁷ EA 03. Jun 18, 2021.

- provided by Oxfam in Uganda, are willing and able to improve their organization's capacity and systems to take advantage of opportunities to participate in the humanitarian response.
- **4. Accountability challenges:** Local accountability for donor funds is said to be problematic. One respondent noted that some local actors are unable to meet donor reporting standards and other accountability requirements, placing them in a bad light with donors or their intermediaries. In most cases, local actors do not fully account for the funds granted to them; this affects donor trust in their capacity and their ability to manage funds. Some donors have lost trust in local actors and stopped funding them because of the perceived risk. Even though some of the accountability concerns are not entirely true, the situation has shaped perceptions among most donors and intermediaries, resulting in a generalization that local actors lack the competence or capacity to manage donor funds, and thereby reducing opportunities for local actors to engage in the humanitarian response.
- 5. Poorly designed capacity building: Some local actors observed that some of the capacity building international actors provide is not demand-driven or needed. These international actors reportedly identify and design capacity building trainings without engaging local actors to determine the training priorities. As a result, the capacity building offered often does not address local actors' specific priorities, especially those related to institutional capabilities and organizational structure, such as financial management, policies, systems, and accountability mechanisms. This disconnect explains the persistent capacity challenge among local actors despite numerous capacity building opportunities. In addition, some trainings are short-term, untailored, and unstructured, limiting their potential to make a difference in local capacity.
- 6. Power dynamics in coordination mechanisms:

 Several different power dynamics in coordination mechanisms undermine their potential to advance localization. One power dynamic occurs between expatriate staff from international organizations and their local counterparts from

- local organizations. In most cases, expat staff dominate and exert more influence over coordination meetings, and their views are more likely to be respected than those of local actors; this affects how well responses prioritize local needs and are otherwise context-appropriate. Power dynamics also exist at the local level between local actors. Larger, more established local actors generally have a larger role and a greater voice than smaller local actors. The larger local actors generally have more resources and are also said to understand international jargon. Their ability to master this jargon gives them more clout in humanitarian spaces, which can translate into more funding opportunities. In some cases, the larger national organizations tend to work primarily with each other, sidelining smaller local actors that they see as "not good enough" or with weak capacity. In terms of localization, these power dynamics mean that priorities are not identified through a bottom-up approach, thus limiting the humanitarian response's capacity to reach and assist the crisis-affected population. In addition, smaller, more local organizations tend to represent marginalized populations, such as women, youth, and refugee populations; excluding these smaller organizations means excluding or minimizing the voices of marginalized groups. To illustrate, after an initial review of the ELHNA project by Oxfam Uganda, it was noted that some of the smaller groups like women and refugee organizations were found to have been excluded from the project, in part, due to criteria used. Consequently, a deliberate strategy and approach was used to ensure the inclusion of these marginal groups in the project.
- 7. Funding conditionalities and challenges:
 Funding for local actors engaged in humanitarian
 responses continues to face many challenges

responses continues to face many challenges. For example, available funding is generally through short-term, inflexible subcontracts with international actors, and it does not usually address local priorities, limiting its potential impact. In addition, funding is often delayed, arriving after the onset of the emergency, when needs have frequently changed. Local actors also face numerous barriers when it comes to accessing humanitarian funds. In particular,

- donor funding conditions and due diligence requirements are too stringent for most local actors. For example, to access some humanitarian funds, applicants are required to demonstrate a funding track record of 5 billion Uganda Shillings (approximately USD 1.4 million). It is essentially impossible for most local actors to meet this type of requirement; their only option to access such funds is to partner with international actors or intermediaries. Furthermore, both local and international respondents expressed concern about donor trust in local actors to access and manage funds. Finally, funding to local actors does not sufficiently cover their overhead or operational costs, especially when considering their need to hold some funds in reserve for any emerging needs. International actors also do not cover overhead costs in their partnerships with local actors. Most local actors noted that they are unable to hire and retain qualified staff because they cannot offer competitive remuneration or decent working conditions or implement institutional development plans. In most cases, the most qualified staff end up with international organizations, which pay better and offer better working conditions, weakening the local organization's capacity and, therefore, affecting how well they can implement and deliver an effective humanitarian response.
- 8. Donor funding frameworks and complex appli**cation processes:** Most donor representatives acknowledged that their funding applications are complex, and it is difficult for local actors to meet their requirements. Even when invited to apply for funds, local actors cannot generally compete. This is partly due to their weak organizational capacity, particularly in terms of human resources; they lack qualified staff who can manage and write strong grant proposals. Conversely, international organizations tend to have dedicated teams just to manage the proposal and grant application processes, facilitating their ability to meet application requirements. Importantly, for all the donors consulted, their current funding frameworks are not designed to provide direct grants to local actors. Rather, the standard practice is to provide grants

- to international actors, who can then subcontract to local actors. This limits the ability of local actors to access funds for leading and managing a humanitarian response.
- 9. Multiple coordination mechanisms: Some donor respondents expressed concern about the multiple coordination mechanisms in Uganda, which can be confusing and make it hard to keep track of discussions. For example, there is an umbrella donor coordination group that should interact with all the other coordination groups, but this is not yet happening. The multiple coordination mechanisms and meetings create fatigue among actors, especially when they do not result in actionable outcomes. Instead, the numerous meetings seem to lead to another taskforce or group, compounding the existing challenge of multiple mechanisms. In addition, participation in the numerous coordination mechanisms takes valuable time away from efforts to implement the humanitarian response. Respondents also observed that there is a disconnect between centralized (capital-based) and local-level coordination mechanisms. Of note, the decisions, discussions, and agreements that occur at one coordination meeting are generally not disseminated to other coordination groups, especially those at different localization levels, creating an information gap between actors at different response levels. When decisions do get circulated, it is usually in a top-down manner and does not take local views and experiences into consideration.
- 10. Reporting challenges: Overall, local actors reportedly perform well when it comes to implementation; however, they are not as skilled at articulating that performance in a report. In most cases, reports by local actors do not give donors or other funders a comprehensive account of their work. This lack of full information often leads to donor mistrust, suspicion of local actors, or concerns about misuse of funds when, in reality, local actors have implemented the program, but do not know how to communicate their work. As a result of the mistrust created, some local actors are sometimes cut off from

- funding, limiting their ability to assist the crisis-affected population in a timely manner. From their perspective, some local actors expressed concerns about the pressures of donor reporting requirements and how these requirements take away time from efforts to deliver humanitarian assistance. Depending on a project's duration, reporting requirements can be monthly, quarterly, biannual, or annual. Even when funding is short-term or delayed, local actors feel pressure to demonstrate impact, which, at times, they say, is not realistic. To meet these requirements, some local actors feel compelled to forge results that do not accurately represent the true context or situation on the ground.
- **11. Unequal partnerships:** Although there are more partnerships today between local and international actors compared to the period before the Grand Bargain (before 2016), most of these partnerships are unequal and one-sided. Most partnerships are based on short-term subgrants to local actors to implement specific activities and, unfortunately, offer little room for negotiating partnership terms or funding priorities. Moreover, donors do not trust local actors to manage funds; thus, donors channel funds through international actors with the systems and mechanisms in place to minimize risk. Generally, the entity that manages the funds or resources usually the international actor—dictates the rules and conditions of the partnership. Conversely, local actors have a very limited voice, or none whatsoever, when it comes to determining partnership priorities and interactions. The relationships and interactions between international and local actors were described as, senior and junior, big and small, or superior and inferior. Instead of shifting power and influence to local actors, as envisioned in the Grand Bargain, these types of partnerships reinforce existing power dynamics and relationships. For example, some international partners reportedly show up at the local partner's premises without prior notice and demand to be seen regardless of the local actor's plans. International actors are also said to organize meetings without consulting local actors and then require the local actor to participate or risk jeopardizing their funding flow. In addition,

- some international actors micromanage local actors, demanding to take part in every process or activity of the local partner, possibly due to perceptions that local actors lack the necessary capacity.
- **12. Remoteness and access challenges:** Some local actors are located in extremely remote locations with poor or even no access to the electricity, internet, phone, or bank services needed to do their work. Despite these realities, the international humanitarian system does not recognize how these circumstances affect local actors and their ability to coordinate and communicate effectively. For example, applications for some humanitarian funds are only available online, hindering the ability of local actors without regular Internet access to compete fairly for these funds. Similarly, some partnerships with international actors ignore the challenges local actors face to deliver humanitarian assistance or provide reports for their work. For example, several local respondents reported that their international partners do not understand their inability to reply to an email on time, disregarding the fact that they have to travel miles, sometimes to the next town, to access their email.
- 13. Government restrictions: Some actors, especially those implementing a mix of human rights, governance, and humanitarian response efforts, find that government restrictions are affecting their work. Increasingly, the GoU has tried to silence its critics for what it deems Western attempts to influence or delegitimize the government. The GoU is suspicious of the international response, viewing it as a means to support regime critics and destabilize the government. Local actors, and some international groups, have been subject to extreme surveillance by the government and state security agents, limiting the ability of humanitarian actors to do their work and assist the crisis-affected population. Some organizations have been closed, had their registration revoked, their accounts frozen, or their staff arrested on trumped-up charges, causing them to lose the resources they need to provide humanitarian assistance. Some offices and homes have been raided, and equipment like phones and laptops have been stolen. The gov-

ernment has threatened to remove the registration of local actors in the NGO Bureau, which has become heavily politicized. It also uses the antimoney laundering law to silence critics who rely on international funds for their work. In addition, some local actors have been charged with frivolous claims, such as the failure to file tax returns, to prevent them from speaking up against

the government. Together, these tactics have worked to stifle civil engagement and constrict civil society spaces in the country. Mainly local actors, and some international actors are more cautious in determining the risks they are willing to take, limiting innovation and, especially, their ability to assist the crisis-affected population.

Recommendations for Donors

- 1. Address all dimensions of localization.
 - Currently, donor focus and discussions about localization center on funding, which is only one of the seven dimensions of localization. While funding is important, it should complement the other dimensions of localization; for example, it should contribute to equal partnerships and the realization of the other dimensions. Therefore, for greater effectiveness, donor focus on localization should address and include all seven dimensions of localization, as laid out in the different workstreams of the Grand Bargain.
- 2. Use technology to offer more direct funding to **local actors.** Current donor funding mechanisms are designed to administer large grants; they are not designed to manage numerous small grants to local actors. Some respondents recommend that donors take advantage of advancements in technology to more effectively and efficiently provide direct funding to local actors. Technology use can reduce the donor burden of managing numerous small grants and help local actors comply with funding conditions. While, as mentioned before, some local actors may struggle with internet access and technology, other local actors expressed that they could leverage technology to better access more direct funding from donors.
- **3.** Reduce donor requirements for local actors. To advance the localization agenda, donors

- should find ways to direct more funds to local actors and accept higher levels of risk to do so. For example, donors could reduce the due diligence conditions required for local actors to access their funds. Such a change would require a significant shift in existing norms, including donor culture and systems.
- 4. Clearly define "local actor." Although donors occasionally fund established local actors, there should be greater clarity about what constitutes a local actor, especially for groups that are not organized like traditional INGOs. Local actor could refer to religious groups, local residents, clan systems, private sector groups, or others who are not traditional humanitarian actors. Clearer definitions of a local group can help donors understand where their funds are going and who can realistically make use of their funds. Clearer definitions of local actors will also help clarify the concept of a local humanitarian response and the role local actors play in that response.
- 5. Establish clear and transparent goals. Donors should be transparent about their goals in a particular country so they can determine how well solutions can suit the local context or priority and if a proposed solution is important to them as donors. The Covid-19 pandemic has provided some lessons. For example, wealthy donor countries were supposed to supply Covid vaccines to poorer countries. However, a limited

¹⁸ The seven dimensions of localization are funding and financing, capacity, visibility, coordination, participation revolution, relationship quality, and policy and standards; although the four most cited dimensions are funding, capacity, partnerships, coordination, and accountability. K. Van Brabant & S. Patel. 2018. "Localisation in Practice: Emerging Indicators and Practical Recommendations." Disasters and Emergency Preparedness Programme, Global Mentoring Initiative (GMI). Accessed on Nov. 11, 2021 at https://reliefweb.int/sites/reliefweb.int/sites/reliefweb.int/files/resources/Localisation-In-Practice-Full-Report-v4.pdf

supply of vaccines was available, and, despite a long presence and working relationship in a country, donor commitment to providing vaccines to poorer countries dwindled as they prioritized their own countries. Donors should be clear about what they are trying to achieve in a country and be held accountable for their presence and their work.

- 6. Account for the multiple risks local actors face. Currently, donors use financial and compliance requirements to deny funding to local actors. However, these assessments fail to account for the numerous risks local actors face daily. For example, of greater concern than any financial risk, the local staff of organizations working on the frontlines can face the threat of death, arrest, and detention for doing their work. Donor partnerships and funding methods should, therefore, take into consideration the multiple risks local actors face, that might affect their work differently than funding. For example, donor funding should make it possible for local actors to respond to such emerging threats without delay and, where possible, evacuate or provide litigation services, safe houses, or temporary relocations for the safety of local staff. Thus, funding should go beyond financial and compliance concerns to spread risks and close the funding gap to local actors.
- 7. Avoid a one-size-fits-all approach to local funding. Donor funding to local actors should recognize that different local actors have different levels of experience and growth. When determining funding levels, donors should account for these differences in local capacity instead of a one-size-fits-all approach to local funding. Some local organizations are ready for more significant funding, while others may still need funding, but at lower levels and with more time needed for growth. These different levels of local actors must be reflected in the donor funding requirements.

- 8. Designate some funds for local actors only.

 Donors should establish some restricted funds and requests for proposals (RFPs) that are designated only for local actors. These RFPs should have different threshold requirements than traditional grants so that more local actors can access these funds. Importantly, these RFPs should be designed with the local context in mind; for example, they should consider the best way to promote and issue RFPs to local actors in remote areas with limited internet access.
- 9. Establish country-level emergency funds.

 Donors should commit to fund country-level emergency funds for humanitarian assistance so local actors can easily access funds in an emergency without contending with the administrative burden imposed by the international humanitarian system.
- 10. Enforce the Grand Bargain's 25 percent local funding commitment. Currently, most international actors do not meet the Grand Bargain's commitment to direct 25 percent of humanitarian funding to local actors. Donor agreements with international actors should enforce this 25 percent local funding commitment, and these agreements should be monitored for compliance.
- 11. Remove barriers to direct local funding. Donors should remove barriers from the grant application process that hinder or bar local actors from accessing humanitarian funding. For example, the application process should be short, precise, easy to understand, and simple to access. When possible, and before the application process opens, donors or their partners should provide local actors with hands-on mentorship and support for the application process to help increase their chances of meeting the grant requirements.
- 12. Encourage feedback from the local level.

 Respondents recommend more bottom-up processes so that feedback from the local level can reach donor working groups at the national level and inform funding decision making and priorities that reflect local context and needs.