ALNAP

LEARNING TO BE MORE 'LOCALLY LED'?: CURRENT PRACTICE AND EVIDENCE GAPS IN THE INTERNATIONAL HUMANITARIAN SECTOR

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ALNAP is a global network of NGOs,
UN agencies, members of the Red Cross/
Crescent Movement, donors, academics
and consultants dedicated to learning how
to improve response to humanitarian crises.

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Acronyms

CBO	Community-based organisation
CSR	Corporate social responsibility
AAP	Accountability to affected populations
CBPF	Country-based pooled fund
CDP	Center for Disaster Preparedness
FCRA	Foreign Contribution Regulation Act
IASC	Inter-Agency Standing Committee
ICR	Indirect cost recovery
IFRC	International Federation of Red Cross and Red Crescent Societies
INGO	International non-governmental organisation
NNGO	National non-governmental organisation
UNHCR	United Nations Office of the High Commissioner for Refugees
UNOCHA	United Nations Office for the Coordination of Humanitarian Affairs

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1. Introduction

Supporting locally led humanitarian action has become a priority for many in the international humanitarian sector. For some, this shift is driven by an ethical imperative; for others it is a practical reality. Yet, while 'localisation' has become a buzz word, the pace of change has fallen far short of the rhetoric of international actors and the hopes of national and local organisations.

Research around localisation/locally led humanitarian action proves particularly challenging since its interpretations change depending on where you are or with whom you are speaking. So, although significant attention and literature have been generated since the build-up to the 2016 World Humanitarian Summit, this has primarily focused on tracking progress against commitments towards localisation made by international actors. There is surprisingly little evidence on the relationship between locally led humanitarian action and performance on the ground.

Seven years on from the World Humanitarian Summit, as thinking and practice around localisation have become more mature, as donor policy is starting to shift, and as patience for meaningful change begins to erode, we find ourselves at a critical moment to consider the learning agenda for localisation.

Against this backdrop, ALNAP carried out a scoping review to gain insight into the following questions:

- How have the debates and concepts of localisation evolved since the World Humanitarian Summit, including around terminology?
- What are the achievements, challenges and barriers to progress on commitments to localise?
- What potential value is added by locally led approaches to humanitarian performance?
- What are the gaps in learning and evidence on these themes?

This paper aims to provide a clear summary of the evidence and perspectives to date around the issues of localisation and locally led action. Based on the learning gaps that emerged through the literature review and interviews, it also sets out a broad learning agenda around this topic.

1.1 Methodology

This paper is the result of a scoping phase, out of which the ALNAP Secretariat will take forward future research and learning work around the themes of localisation and locally led humanitarian action. The review has focussed on capturing current understanding around localisation and locally led concepts, and on identifying the existing learning gaps. As such, this paper reflects the emerging issues on this topic that may be useful across the sector more broadly.

For the scoping study, we undertook a literature review covering papers and syntheses, grey literature and organisational policies, and broader editorial and opinion pieces on some of the nuanced aspects of the localisation debate. Considering that a number of comprehensive literature reviews have recently been undertaken by prominent research organisations, we did not attempt to fully duplicate this process, instead taking the existing reviews as a starting point.

We also made a concerted effort to bring in the views of a cross-section of the sector and different parts of ALNAP's membership. Through a mixture of semi-structured interviews and broader discussions, we were able to reach out to 35 people across 29 different organisations including donor agencies, networks, international non-governmental organisations (INGOs), consultants and national/local organisations. Interviews were conducted on the basis of non-attribution and quotes have been anonymised in this report.

Table 1. Types of stakeholders engaged (discussions and interviews)

Type of stakeholder	Number of organisations
Donor agencies	2
UN	1
Networks (Global South-based NGO networks and INGO networks)	6
INGOs	8
Local/national NGOs	6
Independent consultants/research orgs working on locally led humanitarian action	6

Inputs for this scoping study were also gathered from the State of the Humanitarian System launch event in India and small roundtable discussions with humanitarian leaders in London, which included UN, donor and INGO representatives.

Limitations

This study focuses on the international humanitarian system and local and national non-governmental organisations (NGOs). We did not carry out any interviews with national and local government representatives; although referenced within the literature discussed, these actors' views were not sought directly.

ALNAP is a multi-stakeholder humanitarian network and our research aims to reflect a full range of viewpoints and experiences from across the humanitarian system. Although ALNAP's UN members were contacted to invite their participation in this scoping study, only one was available to take part in an interview.

BOX 1: Note on usage of key terms

The terms '**localisation**' and '**locally led action**' are both used throughout this paper — but not interchangeably. Rather, they are used to reflect what many key informants articulated as two different starting points to the issue of the role of local actors in humanitarian action:

Localisation is the mainstream, and more narrow, approach taken by the formal international system. It is embodied in reform efforts like the Grand Bargain — which speaks of being 'as local as possible, as international as necessary' and narrowly frames localisation in terms of 'strengthening international investment and respect for the role of local actors, with the goal of reducing costs and increasing the reach of humanitarian action' (Grand Bargain Localisation Workstream, 2021).

Locally led action is used to denote approaches where programmes are conceived, shaped and delivered closer to the affected communities; designed in accordance with local norms and needs; and which may occur with or without support from the formal international system.

Acknowledging the many different interpretations of these terms — including those that use much wider and much narrower sets of metrics — we do not attempt to offer a new definition.

Finally, while recognising their shortcomings, this paper uses the terms 'Global North' and 'Global South' for lack of better terminology.

1.2 Structure of the paper and highlights

To help navigate the paper and to provide a useful executive summary, this section briefly describes — and then presents highlights from — each chapter in turn.

Chapter 2 sets out the progress (or lack thereof) on localisation commitments. It tracks three main sets of metrics that are used as proxy measures for moving the needle on commitments: the quantity and quality of funding; the involvement of local and national organisations in decision-making forums; and issues around due diligence and risk sharing.

Key messages:

- Both the quantity and quality of funding remain a challenge, with direct funding to local and national organisations only reaching 1.2% in 2022 (as opposed to a commitment of 25%).
- A large number of UN agencies and INGOs are now putting together organisational policies around overhead costs.
- National and local organisations are finding ways to bypass the international system and to simplify process for their community partners.

Chapter 3 explores the continuing challenges and barriers facing efforts to move further towards locally led action.

Key messages:

- The question of who is 'local' is still debated within the sector, and the official Inter-Agency Standing Committee (IASC) definition is highly contested by many home-grown organisations across the Global South.
- There is a fear that localisation is becoming another form of sub-contracting — with INGOs incentivised to find and cultivate 'mini-me's.
- The sector needs to break silos in programming and the use of funds. This includes adopting more adaptive management; working more on nexus approaches; and putting flexibility at the centre of siloed divisions between accountability to affected populations (AAP), locally led action, and the nexus.
- Those working in humanitarian jobs face the issue of a loss of identity — personal and organisational — in shifting to a more intermediary role.

Chapter 4 delves further into perceptions of localisation and locally led action that emerged from the scoping, laying out key attributes of both approaches.

Key messages:

- Interviewees across the sector commonly saw localisation more as an interior system-change process and the terminology as mainly useful for international agencies.
- Locally led action, on the other hand, was seen by key informants as a broader approach, which, at heart, is about building on existing assets in crisis-affected areas.

Chapter 5 lays out a possible research and learning agenda around localisation/locally led action, based on the learning gaps identified by the key informants and through the literature review. The learning agenda is tied to the challenges identified in Chapters 2 and 3 and considers both localisation and locally led perspectives.

The chapter presents three sets of learning and evidence challenges, alongside our suggested agenda through which these issues could be addressed:

- The impact of localisation on humanitarian performance.
  - ‣ What is the impact of current localisation practices on humanitarian performance — do they make it cheaper, faster, more accountable?
  - ‣ Are these even the right metrics?
- The broader value-add of locally led humanitarian action.
  - ‣ The case for longer-term, qualitative analysis and a data bank of locally led case studies from across different contexts.
  - ‣ Guidance on how to better measure and aggregate impact when looking at locally led action.
- Operational processes and barriers.
  - ‣ The question of 'how' to localise.
  - ‣ Barriers around incentives; achieving equitable partnerships; and funding mechanisms.

Chapter 5 also looks at the question of whose evidence matters, interrogating the dearth of Global South voices within the commonly referenced literature.

Key messages:

- Core questions include: Who is asking; what are they asking; to whom are they asking; and is the sector really interested in listening?
- There is an implicit valuing of one style of evidence (empirical, quantitative, often sleekly written and published) over others (anecdotal, storytelling, oral traditions).
- Much of the learning around the value of locally led action is anecdotal and exists in stories in people's heads, rather than as published, peer-reviewed papers.
- Global North-based research organisations need to consider how to work more equitably, and deal with this embedded bias.

Chapter 6 ends with some key considerations to keep in mind as this work is taken ahead.

2. The 'localisation' agenda

2.1 Progress on localisation or lack thereof

Realising the formal commitment to localisation has been a long process. Although locally led action has always occurred in every crisis situation, efforts to 'localise' the formal international humanitarian aid system began to intensify in the run up to the World Humanitarian Summit in 2016.

Now firmly embedded in all humanitarian policy discussions, localisation is broadly seen as an effort to increase the capacity and funding of local actors in humanitarian response. However, definitions and interpretations of the term vary considerably across stakeholders and contexts (Robillard et al., 2021; Barbelet et al., 2021; Wijewickrama et al., 2022; DA Global, 2020).

These interpretations range from the broad 'as local as possible and as international as necessary' in the Grand Bargain (Grand Bargain Localisation Workstream, 2021), to specific factors and indicators such as those defined by the Network for Empowered Aid Response (NEAR, 2019). The key differences among the range of interpretations lie in the degree of emphasis placed on funding and capacity versus decision-making and power.

Running deeper is a divide between what is seen as localising the international sector versus actually handing over power to locally led response efforts. This is a key distinction this paper will explore more in Chapter 4.

As one INGO representative commented:

> **I always remind people that localisation started as an efficiency tool. We have increasing needs, shrinking money and it's just an efficiency tool to be better at delivering humanitarian response. All these beautiful papers of transformative agenda moved the global agenda a bit but it is still very much efficiency based.**

Localisation is being pursued by individual agencies but also in a variety of inter-agency forums (see Box 2). Such collective initiatives are seen as an important source of guidance or shared definitions, such as the Inter-Agency Standing Committee (IASC) Task Force 5. They are also vital to make specific public commitments that can then be used to hold organisations to account — such as the Grand Bargain or Charter for Change.

Across the different initiatives, three sets of metrics have really stood out as yardsticks for progress (or lack thereof). The first and most prominent is funding. The second is the inclusion of local and national actors in decision-making forums. The third comprises measures around due diligence and risk compliance — and new ways of reducing and sharing the burden.

The remainder of this chapter considers progress against each of these metrics in turn.

BOX 2: Forums and initiatives working on localisation

• Grand Bargain: The Grand Bargain was a commitment primarily by donors, the UN system and larger INGOs. Caucus talks have been held around two of the most entrenched challenges — one on funding and one on the role of intermediaries. The most recent iteration, in June 2023, has agreed to continue this focus, while bringing back a commitment on the nexus. There is also a drive to simplify self-reporting.

• Inter-Agency Standing Committee Task Force 5: The UN-led sub-group on localisation has served as the focal point for a lot of the accepted definitions.

• Charter for Change: Building on and breaking down some of the Grand Bargain aims, the eight-point charter is a commitment made by INGOs and endorsed by national and local organisations. It includes specific commitments around direct funding, partnership, transparency, recruitment, advocacy, equality, support, and promotion.

• Pledge for Change: Targeted at INGOs and driven by a year-long process spearheaded by Adesso, the Pledge for Change was formed in October 2022. It represents the first attempt to develop metrics around issues such as storytelling and equitable partnerships that will be judged from local partners' points of view.

• ShiftThePower: An advocacy movement of community, local, national, and international networks and organisations who are seeking to 'tip the balance of power in the development sector towards a fairer and more equitable people-centred development model.' This has seen few mainstream humanitarian actors getting involved so far.

2.1.1 Funding: Quantity and quality both remain a challenge

Quantity

The Grand Bargain commitment of 25% of funding going as directly as possible to national and local organisations is still a long way from being met. It hit a high of 3.3% of all funding in 2020 but reduced back to 1.2% in 2021 and 2022 (ALNAP, 2022a; Development Initiatives, 2023).

Perhaps more surprisingly, COVID-19 didn't prove the tipping point that it could have been in driving localisation. There was a hope that the conditions raised by global lockdowns, travel bans and the inability to do direct implementation would spur a momentum in passing on funding to local actors. This turned out to be misplaced. While national and local actors were at the forefront of delivering the COVID-19 response,

just 2% of the Humanitarian Response Budget funding went to them. The vast majority (77%) was allocated to UN agencies in the first instance (Kerkvliet et al., forthcoming).

This trend continued in Ukraine, with reports finding that less than 1% of the USD 3.9 billion tracked by the UN in the first year after the invasion went directly to local actors (Harrison et al., 2022).

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Country-based pooled funds (CBPFs) have had better success in providing funds directly to national and local organisations. In 2022, local and national actors directly received 27% of the fund globally (OCHA, 2022). Yet the amount of funding in the pooled fund constantly falls short of its intended target — which is meant to be equivalent to 15% of the whole Humanitarian Response Fund for the previous year. For instance, as of mid-September 2023, the CBPF stood at just 28% of the current target. CBPFs also exist only in 17 countries as of 2023 — and the majority of funding is channelled to a handful of those (OCHA, n.d. b).

Taking cognisance of this lack of progress, a small caucus within the Grand Bargain, which included a handful of donors, UN agencies, INGOs, and the International Federation of Red Cross and Red Crescent Societies (IFRC), agreed to develop individual roadmaps with milestones to reach the target 25% of funding to local organisations. These are set to be published by the end of 2023 (IASC, 2023).

Quality

When it comes to funding, it is not just a question of how much is being given. It is also essential to maintain a focus on quality. The Grand Bargain discussions over the past few years have shifted to encompass this dual focus, including important conversations around multi-year, unearmarked, or flexible funding. We tend to see pockets of high-quality funding in very limited pilots. At the same time, when the *quantity* of funding goes up for local organisations, it doesn't necessarily mean better *quality*. Both are needed.

Debates are ongoing in the Grand Bargain Group between the donor community and international organisations, particularly the UN, over progress on ensuring quality funding for internationals themselves. At the same time, there is little evidence on how and whether the UN and INGOs — in their role as intermediaries — are reliably doing the same for their local partners.

Donors are increasingly recognising and supporting this dual focus. The US, the world's largest humanitarian donor, committed to giving 50% of all funding to programmes that 'place local communities in the lead' by 2030. This approach to 'catalysing and supporting local action' has seeped into policies around their ways of working, including (on paper) a high-risk appetite to implement through local partners. However, their commitment to 25% direct funding to national and local

organisations by 2025 appears to have hit challenges due to inhibitive legislative restrictions and bureaucratic hurdles (USAID, n.d.). USAID's definition of 'local' includes nationally established partners of an INGO or company, reflecting an approach to definitions that is contentious with national NGO leaders (discussed further in Section 3.1). Additionally, USAID's direct funding to local and national actors is calculated on a smaller subset of aid, which excludes project funding such as activities delivered by the UN, other public international organisations and the public sector (Tilley and Jenkins, 2023).

The EU released a guidance note in March 2023, which focuses on promoting equitable partnerships with local responders in humanitarian settings. However, they are restricted by parliamentary mandate to only be able to transfer money to European organisations. Interestingly, while there is a clear commitment to encouraging their European partners to offer multi-year funding for their local partners, flexibility is qualified as only 'when available' (European Union, 2023).

Other individual donors are making headway on policies that they hope will lead to better funding practices or new requirements for the INGOs they fund. For instance, DANIDA and Irish Aid both have good practices in places for multi-year, flexible funding, though this is only for first-tier recipients (i.e., mainly INGOs). Furthermore, the latest external review of the Grand Bargain found that '…it appears that most of the funding that is passed down does not have the same multi-year and/or flexible quality with which it is received' (Metcalfe-Hough et al., 2023).

A core component of quality funding is the provision for indirect cost recovery (ICR), which refers to reimbursement for overhead costs, within an organisation's funding policies. Yet there is no standardised approach to ICR across the sector or even, in many cases, across an organisation itself. In an IASC review in 2022, just three of the 13 INGOs that were analysed had ICR policies in place (Girling-Morris, 2022). There has been movement on this over the last year, however, with more UN agencies and INGOs working on putting in place clearer ICR policies (Development Initiatives and UNICEF, 2023). As one INGO interviewee commented, 'We recently developed a global ICR policy for our local partners, which is being rolled out globally now. Prior to this, decisions around the provision of ICR for local partners was decentralised and in practice inconsistent.'

However, one of the main issues that has still not been addressed is how far down the chain these guidelines mandate the provision of ICR. In the majority of cases, this is only to the first-level intermediary and therefore far from those implementing on the ground.

Where ICR policies are being tried, there are many different models that organisations are using, including: a 50–50 split of overheads received from donors, a percentage, a proportional share, or even a negotiated share. Dutch Relief Alliance, for example, is piloting adding designated ICR funds to direct costs to support intermediary roles and allocating a specific 5% of the budget to support capacity strengthening over the longer term.

There are also some interesting pilots around releasing funding in a timelier manner. The timeliness and predictability of access to funding are critical for cash-flow-dependent smaller organisations. Trócaire has been piloting an initiative in this area

since 2022, with seven partners across five countries. The model works with existing local partners, whereby a small flexible fund (€10,000 to €25,000) is pre-positioned in their bank accounts. The partners can decide when to use it in the case of a crisis event, submitting a simple email proposal for approval and then taking the lead on designing the local response. Reviews have found this is helping partners kick-start their humanitarian initiatives early and be more involved in shaping the broader response. At the pre-positioning stage, partners also submit a proposal for how they would use the fund if a crisis does not occur in the next 12 months, including for possible disaster risk reduction activities. So far in the pilot, this contingency has not been triggered (Dewulf, 2023).

2.1.2 Local and national organisations' involvement in decision-making

Local and national organisations are increasingly present in the formal system, but decision-making and leadership roles remain dominated by international perspectives. This is perhaps especially the case in places where there has been an international presence for years, such as Yemen, where these trends are fundamentally entrenched (Clements et al., 2021).

When the IASC mapped more than 2,400 coordination structures across the world in 2021, local and national organisations were present in 80% of cases. Importantly, this did not take into account the quality of their participation; but meant simply that staff from local or national organisations had attended meetings and participated in assessments or workshops. Overall, these local staff accounted for only 9% of Humanitarian Country Team membership — which is where leadership and decision-making actually happen (Humanitarian Action, 2022). And even when they *are* part of Humanitarian Country Teams, many NNGOs end up as sub-contractors in programmes designed by international actors (see Section 3.2).

This sentiment was echoed in ALNAP's State of the Humanitarian System 2022 practitioner survey. Over 63% of local actors surveyed said the quality of support for their leadership and capacity were either 'poor' or 'fair'. 'The capacity-building university is some black hole that you enter into as a local NGO and never graduate', said one practitioner (ALNAP, 2022a). Another telling sign was a recent open letter from Ukrainian organisations, in which they demanded more of a voice — and an end to capacity-building efforts, which they referred to as 'nonsense' (Global Fund for Community Foundations, 2022b).

2.1.3 Due diligence and risk sharing

In ALNAP's conversations with the sector, due diligence and aversity to risk emerged as two persistent barriers to faster progress on localisation.

This is a challenging issue, as donors understandably feel they need to safeguard their investments. Local organisations' inability to fit neatly into the system, or to produce the required technical proposals and reports, is considered a disadvantage, regardless of their ability to implement quality programming. According to our interviewees, many feel that expectations placed on these groups are unfair. The requirements

needed to safeguard against fraud or misuse of funds in large international agencies are unrealistic to expect of local organisations that are a fraction of that size. And, as evidenced most recently by the World Food Programme food diversion scandal in Ethiopia, it is not clear that these requirements actually work to mitigate risk even in internationally led or delivered responses.

> **There's a feeling that local actors are more risky. And the question is what is that based on? Is it because of those actors or because of us donors? Is it, for example, because donors are not getting the kind of reports that we want? That as a donor, you're seeing things that are going wrong immediately because basically they're not as subtle in terms of presenting it in a way which would not make it look as bad — which is what international actors would do. And a reaction by a donor will be different based on that because there's internal pressure to minimise risks. So, from a donor perspective, the risk and compliance part is one the biggest hurdles for us to move localisation/locally led action forward.**
>
> - Humanitarian donor

Although a few pilot initiatives are tackling this issue head-on, these are still the outliers rather than the norm. For instance, the UNHCR has introduced a new funding modality specifically for refugee-led organisations; this arrangement cuts down compliance requirements and takes into account the specific barriers that such organisations face, for instance the requirement to be legally registered. Our interviewees told us that the UNHCR has signed 71 such grant agreements, of up to USD 4,000, across 22 countries as of 2022.

Meanwhile, a new risk-sharing framework was launched in June 2023, developed by the Risk Sharing Platform under the Grand Bargain, co-led by the Netherlands Ministry of Foreign Affairs, the ICRC, and InterAction (ICRC et al., 2023). Discussions are also being held around how a due diligence assessment and a risk profile are not necessarily the same thing, and fail to take into account the many intangible ways that local organisations navigate risk (Van Brabant and Patel, 2022).

On the other end of the spectrum, national organisations are also trying to find ways to simplify processes for their community-based partners. The Center for Disaster Preparedness (CDP), a national organisation in the Philippines, has negotiated a simplified due diligence process with USAID for its Community Solidarity Fund, which gives small grants to community-based organisations for disaster response and risk reduction work. The CDP has taken on the responsibility (and assumed risk) for its community-based partners, allowing them to simplify some of the processes. For example, CDP has switched from requiring written proposals to accepting video proposals, complementing this with get-to-know-your-partner calls as necessary (Interviews; CDP, 2022).

3. Findings on ongoing debates and intensifying challenges

While there has been a visible shift in rhetoric and accepted norms within the sector, the change in practice on the ground is less clear. A review of the literature, including the 2022 State of the Humanitarian System Report, and interviews with a cross-section of people across the sector reveal several debates and challenges that continue to echo across the humanitarian sector when it comes to the issue of localisation.

These arise from changes in the broader environment, entrenched value systems and ways of working; as well as more philosophical or existential questions regarding the past, present and future of international expressions of solidarity. This paper doesn't claim to cover them all but does pick up on the issues that emerged most frequently through the course of the scoping study.

These debates point to the nuance that is needed in order to see progress, and how a learning and evidence agenda might support this.

3.1 The nuance of definitions: Who is local?

In 2017, a 'Localisation Marker Working Group' under the IASC Humanitarian Financing Task Team undertook an exercise to determine a definition for 'national and local actors'. The final definition it arrived at (broken down into separate statements about state and non-state actors) is:

> *Local and national non-state actors:* 'Organizations engaged in relief that are headquartered and operating in their own aid recipient country and which are not affiliated to an international NGO. (A local actor is not considered to be affiliated merely because it is part of a network, confederation or alliance wherein it maintains independent fundraising and governance systems.)'
>
> *National and sub-national state actors:* 'State authorities of the affected aid recipient country engaged in relief, whether at the local or national level.'
>
> Source: A4EP (2020)

This definition is broad enough to qualify a wide range of organisations as national or local actors, including:

- National governments and sub-national elected bodies
- Home-grown national/local NGOs — organisations that were created and work

within that country or sub-region
- Community-based organisations — smaller organisations that have been created and work within a defined area of the country, often within a specific village/city.

It also includes INGOs that have been registered nationally, such as Oxfam Colombia or Save the Children India (known as Bal Raksha Bharat). This is because the final definition includes a caveat that has since been disputed by many — both for its content and because the caveat was inserted without following the spirit of the rest of the consultations (A4EP, 2020). It allows organisations that are part of global networks, confederations or alliances to be considered local or national when they maintain independent fundraising and governance systems.

This caveat to the definition has allowed INGOs to move from localisation of response to continued national registration of their offices in contexts across Asia, Africa and South America. Some INGOs have seen this as part of a wider move to decentralise and engage in decolonisation work within their organisations (Ramdhani et al., 2021).

Although efforts to engage directly and structurally with the decolonisation agenda have been welcomed by some, this shift has led to tensions. Nationalised branches of INGOs have an outsized ability to mobilise resources as part of a wider international network of organisations with historic ties to the Global North-based fundraising streams. This has left many home-grown national organisations feeling a sense of unfair competition — both for domestic and international funding (Global Fund for Community Foundations, 2022; Chipembere, 2023; Wijewickrama et al., 2022).

This is one of the reasons that the official IASC definition is still controversial and is often interpreted in varying ways by networks and organisations. As pointed out by some of our interviewees — representing both INGOs and donors — definitions can even vary between departments within an organisation.

It is not just the term 'local' that has proven difficult to pin down with consensus. Creating definitions that take into account a wide range of conflicting views is proving difficult within many forms of locally led action. The term 'refugee-led organisations', for example, was long debated by the UNHCR, with an 18-month series of workshops and testing in the field. The final definition that came out of this process was: 'An organization or group in which persons with direct lived experience of forced displacement play a primary leadership role and whose stated objectives and activities are focused on responding to the needs of refugees and/or related communities.' Here, 'direct lived experience' also includes former refugees, with no specific time period included (UNHCR, 2023).

Some have raised the question of advantage and opportunity, as the definition possibly could include organisations founded or led by individuals who are part of the diaspora and live as citizens of the Global North, without ongoing experience of displacement.

These terms matter. They end up determining not just who is eligible to apply for certain types of funding, but also how funding flows are measured. These have a direct impact on progress, as well as skewing perceptions of how well (or badly) the sector is meeting its commitments. At the same time, the broad definitions

undermine the effort to protect a space for local actors, and the recognition of their professionalism and validity as equal players. And in the case of both national/local and refugee-led organisations, the question of power dynamics emerges. Those who may have strong links to the Global North, and a much greater level of access, still end up qualifying under such broad definitions.

Additionally, some question the inclusion of national governments as a local actor. The localisation/locally led discussion is not necessarily the same as national ownership, and some governments see it as possibly undermining their prerogatives (see Section 3.4).

3.2 Is localisation simply a way to re-package sub-contracting?

With the increasing push to work with and through 'local partners', ALNAP's conversations are revealing an intensified rush to 'shop' for national and local organisations that fit neatly into the system. This an old issue, but it is not one that has seen a lot of progress; instead, it is continuing to cement a culture of sub-contracting relationships.

In the State of the Humanitarian System report, for instance, both international and national staff reported that partnership agreements continue to treat local/NNGOs as sub-contractors. Their skills and knowledge are relegated to the implementation of projects designed by others (ALNAP, 2022a). This doesn't allow organisations to develop core skillsets. The advantage of being close to the affected communities, and the ability to understand nuanced needs, is lost if they cannot be involved in programme design.

Throughout the scoping study, we found there was an innate sense that localisation is being perceived as the same system, just run by national and local organisations rather than international ones.

> **The system and international actors like me are sort of incentivised to give money to rather big mini-me type local organisations in capitals, where there is sophisticated middle-class leadership and systems.**
>
> - INGO representative

The incentives to fund 'mini-me' type organisations are built into the ease of the system and the push to reach localisation targets. So, it becomes a shortcut for international actors, working with rather than against the tide of the sector.

When local partners are brought on board, the realities of assimilating with a bigger system puts pressure on their ability to retain their own identity. Our research found that organisational structures, values and ways of working shift to become more aligned with what is prioritised by the power brokers in the system (also see Section 4.2). Frequently, this means more focus on fundraising and paperwork — often at the expense of the more informal relationships that these organisations have built with the communities where they work.

This comes up even in cases where an effort was made to ease such burdens. START Network spent years developing a tiered system for due diligence and corresponding funding caps to better support local organisations. Yet an external review of this system, for example, found that even such simplified approaches still place the burden on local and national organisations to meet international standards before being considered an 'equal partner' (Van Brabant and Patel, 2022).

Nevertheless, there are still organisations who refuse to get sucked into the system — even if that means losing funding — though these cases are arguably rare. A few interviewees spoke about how their partners refused to apply for a funding proposal or take on the role of an intermediary because they felt it would not have a positive impact on their work.

Even within established partnerships, the sense of accountability towards those actually working on the ground is not truly established (Barnet et al., 2021). Risk sharing, or the lack thereof, continues to be a burden of sub-contracting. Agencies have often approached this at an organisational level, seeking to manage their own risk exposure. In the process, risk — financial, operational, ethical, reputational, security, and even human safety — is often passed on to partners, without being managed in the delivery chain as a whole (ICRC et al., 2023). One interviewee described this as enabling a culture of 'pointing fingers' whenever something went wrong, rather than taking shared responsibility.

During COVID-19, for instance, safety risk sharing was haphazard, with few organisations ensuring basics like health insurance, access to protective equipment, or medical leave all the way down to frontline workers (Kerkvliet et al., forthcoming). In Myanmar, local and national organisation staff and volunteers rarely had access to temporary relocation, global insurance schemes, or medivac services, even though they were on the frontline of the response (Humanitarian Advisory Group and Myanmar Development Network, 2020).

3.3 Re-thinking scale

The argument that localised responses don't allow for scale is often cited as a core barrier.

Yet many local organisations and regional networks contest this notion, arguing that the way scale is defined ties it to what a single organisation can do. 'It is about how you frame the vision,' said one interviewee from a Global South NNGO network, continuing:

> **My point is if you mobilise enough people, then we can try to figure out the way that the 1,000,000 people are fed continuously with these distribution and logistics channels being built into the existing systems. But if the vision is that one organisation needs to feed 500,000 people tomorrow, then the option is limited. Very few have that capacity.**

In other words, while it may be more distributed and not centralised, there are other ways to reach scale.

Yet for many donors, the issue is about speed of making announcements (easier with pre-vetted international agencies) and disbursements of a large volume of funding quickly, once sanctioned. Their preference for intermediaries who can absorb large amounts of funding is also linked to capacity constraints, making it more feasible to give larger amounts of money to a smaller number of organisations. This numbers game also feeds into the fundraising cycles, putting smaller organisations at a disadvantage.

This doesn't necessarily translate to speed of response on the ground. It has always been communities and local organisations who respond immediately.

The current scale capacities of the international sector are dependent on three abilities. First, the ability to access these large pots of funding by meeting the eligibility criteria and having the resources to go through the cumbersome application procedures. Second, the ability to use local actors — whom they often designate as sub-contractors — to reach that scale. Finally, the ability to leverage 'economies of scale' through large, centralised procurement systems — but without weighing these cost savings against the potential harm caused to local markets and the reduced ability to customise what is required.

This was reiterated by a representative of another Global South network, who told us:

> **When considering scale, it is important to recognise there are many ways to do it. Across the Global South there are formal and informal national networks, with NGO members ranging from 150 to thousands. In the current system, there is an assumption that local actors are unable to scale efforts or absorb large amounts of money. Members of networks or even local consortia have the same ability as their international counterparts to absorb USD 100 million or even more. It is time our sector begins to think differently and act differently!**

3.4 Shrinking civic space

The challenges within the sector are amplified by the landscape outside it, and the enabling environment that is required to work with those in need.

Currently, civic space — seen as the right to peaceful assembly, association and expression — is in decline around the world, even in countries with long democratic traditions. The Civicus Monitor finds that of the 197 countries it tracks, over 80% are currently in the 'narrowed', 'obstructed', 'repressed' or 'closed' categories in relation to civic space. Of the 'open' countries, the majority were in Europe and Central Asia. Just 3.2% of the world's population currently lives in countries with open civic space (CIVICUS Monitor, 2023).

This shrinking space manifests in a variety of ways across the globe: new regulations for public protests, increased police powers, surveillance of social media and use of internet shutdowns, a widening scope of 'national interest' to override the need for environmental concerns, and a broad-brush use of the notion of sedition, among

others. This has been coupled with increased restrictions on funding (and use of funds) for non-profit organisations and the media.

This has complex implications for locally led humanitarian action. As civic space shrinks, national governments are also increasingly scrutinising the influx of international funding and placing restrictions on how these funds can be used. In India, for example, recently updated Foreign Contribution Regulation Act (FCRA) rules have made it far more difficult for Indian NGOs to receive or pass on funding. The updated rules include requirements such as having a bank account only in a certain Delhi branch of the State Bank of India, and passing on funding only to other organisations that are FCRA licensed. Considering the complexity of both acquiring and keeping the license, most smaller organisations are unable to do so.

> *As civic space shrinks, national governments are also increasingly scrutinising the influx of international funding and placing restrictions on how these funds can be used.*

This echoes across other contexts where international funding is viewed sceptically, or even as a means to support a certain political position. In Zimbabwe and Uganda, for instance, the operating licenses for NNGOs are prohibitive — and are also used as control measures (Chipembere, 2023).

This points to an opportunity for the sector to invest in non-financial forms of support and solidarity — areas that are yet to be fully explored for examples and good practices.

3.5 The 'neutrality' question

The humanitarian principles — especially that of neutrality — are often cited as an impediment to localisation, with the view that those who are close to (or part of) the affected communities cannot be neutral. On the one hand, this rhetoric is seen as racist by many who argue that the idea that only foreigners can be neutral should be ditched (Healy, 2021).

On the other hand, the broader concept of neutrality is itself being debated within the sector, with some pointing out that the principle is inconsistently applied (Atali, 2023), and others noting that the sanctions that international actors must accommodate may be just as hindering when it comes to delivering principled assistance.

This is apparent most notably in the context of Ukraine. In the initial days after the invasion, scholars of ethics, such as Hugo Slim, spoke about how the response would be one of solidarity, not neutrality (Slim, 2022). His predictions were correct. Local groups there are working in a context where many do not see a clear difference between humanitarian and military assistance (Saez, 2022). These discussions are not just academic or linked to funding. When the ICRC head spoke with the Russian Foreign Minister, for example, it triggered a backlash not just for the ICRC, but for the Ukrainian Red Cross as well (Bushkovska, 2022).

With so much attention and support being given to the conflict, it became easier for Ukrainian NGOs to fundraise, even outside the international system. Yet, interestingly, some INGOs also tried to find workarounds to continue funding these groups, while reconciling their bedrock humanitarian principles like neutrality and impartiality. In these cases, funding has mainly been granted on the condition that responders do not support the military using humanitarian money — and that they can convincingly prove their compliance with this (Miedviedieva, 2023).

But the nuances and accommodations seen in the Ukraine response have been absent in other countries or conflicts, raising questions around whether this will signal a shift in the sector's approach, or whether Ukraine will remain an exception.

And as national and local actors in other areas question this double standard, the answer remains to be seen (Atali, 2023).

3.6 The need to break silos — in the use of funds and in programme design

A clear message from the literature and our interviews is that among the major shifts required of the sector for an effective localisation approach are greater flexibility in programming and the breaking of silos. As adaptive management literature has stated, 'moving from a system that will do the same thing anywhere at any time to a system that can do different things in different places at different times requires new thinking about the structural flexibility of humanitarian agencies' (Obrecht, 2019).

When looking at it from this ecosystem lens, flexibility becomes vital. One of the findings of the State of the Humanitarian System report is that 'project outputs are typically agreed at the outset of receiving grant funding and require time and effort to change. Even when donors are more supportive of adjustments, humanitarian staff may not feel they have the bandwidth or time to request them' (ALNAP, 2022a). This is even more valid for smaller and more local organisations, given the number of levels of approval they need to go through within the international system, and the sign-off that they often require from local governments to change what they are doing.

If the sector is to move away from thinking that localisation means the same programmes delivered by different actors, then longer time frames and the ability to experiment will be key. There will need to be hyper flexibility in service delivery that allows for those services to be fully adapted to the priorities and needs of communities.

Secondly, an approach that moves more towards resilience thinking would help break silos. Although funding streams and political considerations make it challenging to expand the strict confines of what is considered 'humanitarian' work, there are small steps being made. Even the world's largest humanitarian agency — the World Food Programme — has recently adopted a dual strategy of 'Saving Lives, Changing Lives'. Meanwhile, the UNOCHA's new Flagship Initiative is piloting more 'bottom-up' and flexible approaches and hoping to also bring some high-profile thinking to this arena (OCHA, n.d. a).

However, this search for better ways of working together also frequently remains at a theoretical level, with organisations prioritising their individual mandates over the

collective. The set-up of the system — with its competitive rather than collaborative funding environment, competition for leadership of sectorial silos (shelter, health, etc.), and skewed internal reward structures — still does not lend itself to working collectively (Wendt and Schenkenberg, 2022).

For crisis-affected families, these rigid silos between the dimesions of humanitarian, development, climate, and peace do not make any sense.

While these shifts are slowly being explored in the international system, the collective, integrative approach has always been an intuitive way of working for grassroots organisations. For crisis-affected families, the rigid silos between the dimensions of humanitarian, development, climate, and peace do not make any sense. In fact, what is now being called the 'humanitarian—development—peace nexus' has been referenced for decades, in different ways: as listening to what communities want; as part of being accountable; as linking relief, rehabilitation and development; or even as community-led action (Anderson et al., 2012; ALNAP, 2023a).

Finally, breaking silos is also required within the framing of humanitarian ways of working. Accountability to affected populations (AAP), localisation, and the nexus overlap in many ways. So much so, that some organisations are clubbing their AAP and localisation initiatives together under the banner of a 'decolonisation' approach. Beyond all the jargon, at the centre of these concepts is the need for flexibility and a more adaptive management approach. Yet, there are few cross-cutting initiatives across this spectrum; one exception is the survivor- and community-led response approach, which has been found to cut across the nexus in a number of small-scale pilots (see Box 3 for more details).

3.7 Beyond policies: The issue of behaviour, mindsets and incentives

Within our interviews, one of the most interesting and unexpected factors identified as a barrier to faster progress towards supporting more locally led action was the question of identity.

I think a big challenge for us is identity. This is really cutting at the roots of our identity historically as a humanitarian actor. People within the organisation have really seen themselves as those who save lives. As we become an enabler and the supporter, it takes away from that identity. So, it really depends on people individually understanding where this agenda is coming from.

- INGO representative

This issue is a complicated one. Within the international system, and particularly among locally led action advocates, there is a quiet but grand narrative about 'working themselves out of a job'. But few actually want this to happen and the current localisation pathways are not even suggesting it, with even local and national organisations talking more about complementarity than replacement.

Yet, there's no doubt that the gap between policies and mindsets, particularly the fear around losing individual and organisational identity, remains a challenging issue that has yet to really be discussed.

As the role of intermediaries within this transitioning system is debated, the policy—mindset gap becomes an underlying challenge. How do these localisation policies actually translate into practice in the day-to-day, and what does this mean at an individual level for those working in the sector? As another interviewee confirmed, this becomes a key barrier to 'really working hard on this issue'.

And this gap also raises once again the question of incentives within a sector that shies away from fundamental change. Research by the Humanitarian Advisory Group identified barriers present within all three conditions — opportunity, motivation, and capability — required for behaviour change towards locally led humanitarian action. It found that 'opportunities for change are often absent; motivation for change is low or inconsistent; and capabilities, whilst often present, are not deployed as fit for purpose' (Lees et al., 2021).

Even within organisations, the department an individual works for seems to have a major bearing on their view of localisation. For instance, an INGO representative working on the policy side of the organisation reflected that it was easier for them to absorb and think about these concepts. But for the programme team, 'getting the project done quickly' might remain the imperative. 'Get the finance team onboard early', several people also commented, 'because they may end up shutting down projects that don't fit the mould'.

4. Turning the lens to supporting locally led action

4.1 The sliding scale from localisation to locally led action

One of the most prominent themes arising across the current practice of and debate around localisation, is the issue of co-option. Who is localisation — in its currently practised form — really for, and whose interests is it serving? Assumptions by different actors around the best future model for humanitarian responses shape the questions that are asked and the solutions that are pursued. This strikes at the heart of how a learning agenda around localisation would be shaped.

Back in 2013, the IFRC estimated that 90% of the world's disasters go silent (IFRC, 2013). Silence has many implications, including the lack of international aid. Even among those who do make the list for receiving international funding, it is not distributed evenly. ALNAP's State of the Humanitarian System report found that 40% of international humanitarian funding in 2021 went to just five countries, and there was wide disparity between the best- and worst-funded appeals (ALNAP, 2022a). In other words, the majority of emergencies occurring around the world are operating with extremely limited, if any, international humanitarian assistance. Localisation may be moving very slowly, but locally led disaster response has always been happening, in every affected area and community. And these offer two very distinct perspectives for engaging in research, thinking and practice around the role of local actors in crisis response.

> *'The term **localisation** implicitly encapsulates the challenges around power dynamics,' said one interviewee. 'I don't think it does justice to the reality — which is that most response is already largely locally led.'*

This quote reflects two different angles for framing the goal of increased support and agency for local actors. One perspective, which one might consider to be the mainstream and more narrow approach to localisation embodied in reform efforts like the Grand Bargain, speaks of, 'strengthening international investment and respect for the role of local actors, with the goal of reducing costs and increasing the reach of humanitarian action (Grand Bargain Localisation Workstream, 2021). The other perspective, sometimes framed as community-driven action, locally led action or local leadership, centres on responses that are conceived or shaped by the affected populations themselves and may be complemented by outside assistance (Wall and Hedlund, 2016).

Although some research has framed localisation as a pathway to reaching locally led action, and others might consider locally led action to simply be one of the many forms that localisation can take, there is a growing sense, seen in our interviews

as well as the literature, that these two approaches offer meaningfully different starting points for thinking about the role and relationships of local and international actors (Baguios et al., 2021). As a recent literature review on localisation thinking and practice puts it, there's 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' (Robillard et al., 2021).

Many key informants across the sector in our scoping study said that they see localisation more as an interior system-change process. They noted that the terminology, although valuable for making the system more equitable, still centres the international system as the primary actor (that which is being 'localised' or is doing the 'localising'). Locally led action, on the other hand, was seen by key informants as a broader approach, which, at heart, is about building on existing assets in crisis-affected areas.

But what does it look like to begin to shift this lens further towards locally led action? At its heart, the idea of 'locally led' is to actually support and assist what exists within communities, rather than imposing pre-conceived norms or creating a parallel market.

Table 2. Perceptions emerging from the scoping interviews of the differences between localisation and locally led approaches

	Localisation	Locally led action
Starting point	Top-down and more process-orientated Starts from a position of needs View of the formal system, by that system	More bottom-up and approach-orientated Starts from a position of existing strengths Takes into account a broader view and elements that exist outside the formal system
Focus	Main focus around who is getting funding within the existing system. While important, this means that debates stay stuck on definitions and percentages	Main focus around how programmes are structured and where decisions about programming are being made
Scope	The localisation lens is very much aimed at the formal international system in an attempt to shift its policies and ways of working	The locally led approach is applicable across all stakeholders working for or with crisis-affected communities, including national and local organisations themselves
Ways of working	Policies and ways of working are often limited to and narrowly focussed on what qualifies as 'humanitarian'	Ways of working (often intuitively) go beyond conventional humanitarian silos; instead flexing to the situation and what is actually required at that point

The localisation/locally led distinction is not a binary dichotomy, but rather a sliding scale, or spectrum. Organisations and networks are not either one or the other, but rather may tend to lean more in either direction at any given time, or in any particular programme.

Furthermore, being 'local' is not a fixed state; it instead depends very much on the surrounding environment. As a NNGO representative reflected in their interview, their organisation may be considered 'local' when speaking at an international level, but would be perceived as 'national' (and thereby 'outside' the community) in comparison to a self-help group in one specific village. This is important, because the shift in lens applies at all levels of the system — including for national and local organisations themselves.

Figure 1: The current spectrum of organisation types involved in localisation/locally led action
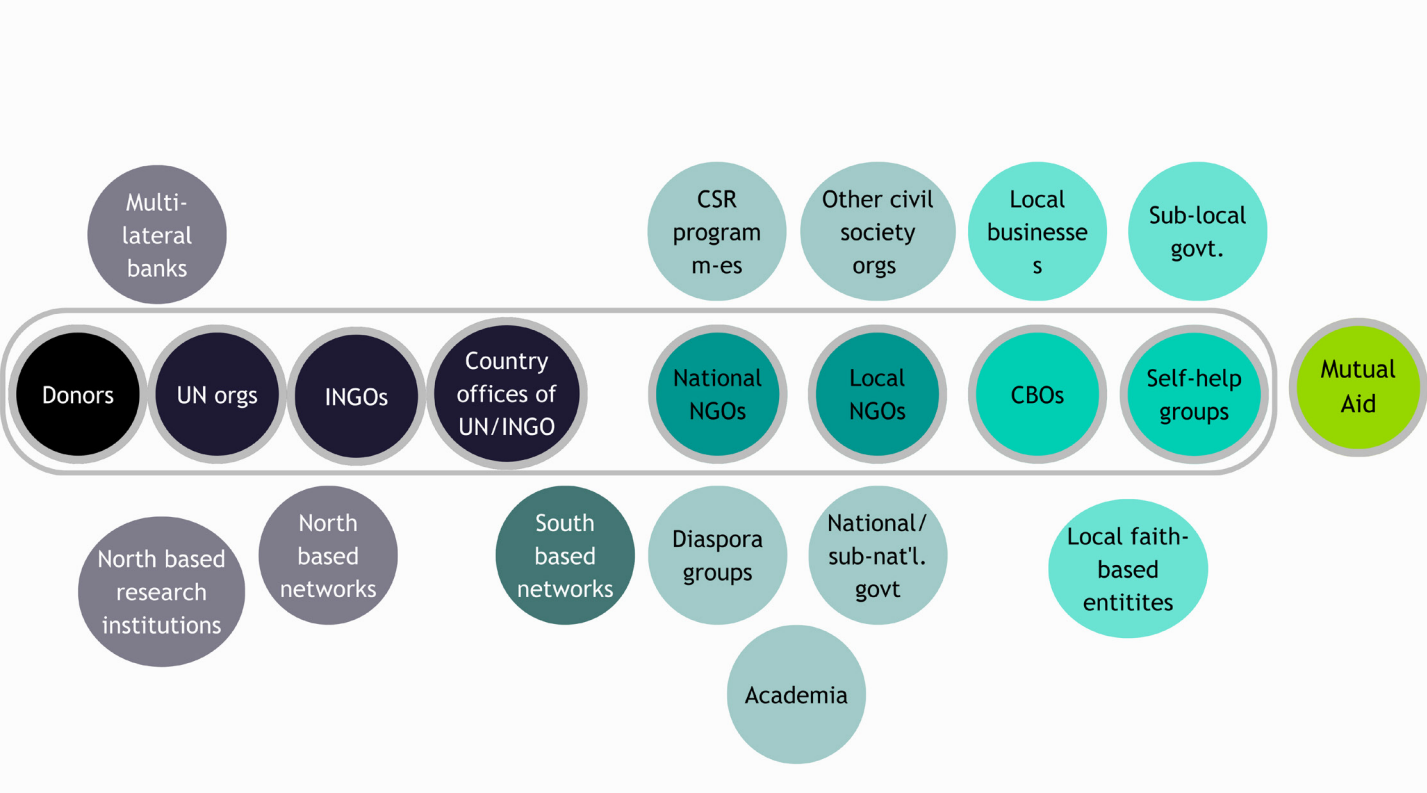
Localisation in the humanitarian aid system tends to focus on the relationship between the first two sets of organisations (represented in Figure 1 by the black/grey and the teal-shaded bubbles, respectively) and the pathway of funding tends to run most often along the centre strip. Much of the localisation effort focuses on creating doorways for national and local NGOs to access funding or decision-making positions within the existing structures. It is centred on increasing the inclusion of national and local actors in an internationally designed and led system of finance, regulation and norms.

But locally led action, in its purest form, tends to occur at the furthest end of this spectrum — the right-hand side as shown in Figure 1. It is situated in the culture and norms of people affected by crisis. This is the idea of mutual aid: spontaneous, often unorganised, and hyper-local activities that form the majority of responses, particularly in the initial days. Within the current structures of the formal aid system, there are limits to how far and how much international assistance reaches across the breadth of the spectrum; and genuine questions as to whether such aid may end up changing the very nature of those hyper-local efforts, given the need to adjust to international systems.

Issues around mutual aid, at the farthest end of the spectrum, intersect directly with those of AAP and inclusion, often requiring the same type of solutions. These solutions include building adaptive structures that focus on community-determined outcomes, and seeing crisis-affected people as knowledge holders and active agents (Doherty, 2023).

Yet there are also areas where inclusion and locally led action might pull apart, particularly due to cultural dynamics where there are historical patterns of marginalisation and exclusion within crisis-affected communities. More granular analysis that takes into account context-specific power dynamics is still not featured in the international localisation discourse and is only nascent in AAP literature and practice. Research has found that concerns around covering all target groups supersede the appetite for granular analysis (Christoplos et al., 2018); and that the emphasis is often on meeting specific needs or prioritising resources (Lough et al., 2022). In many cases, inclusion is still understood in categorical terms, focusing on specific groups of people or categories of need — such as gender, or people with disabilities — rather than as an issue of rights and historical injustice (Lough et al., 2022).

BOX 3: Going one step further: Supporting mutual aid through the survivor- and community-led response approach

One of the tools that is being used to support local organisations to engage more with communities and mutual aid is the survivor- and community-led response approach. This methodology attempts to plug into the dynamism of those spontaneous initiatives and to provide flexible funding.

A small number of INGOs are promoting this model with the local partners they support, with most running it as a pilot alongside more traditional aid. The approach allows those affected to determine how resources are invested and to take an active role in that delivery. Among the leading findings to emerge from these interventions is that these micro-grants cut across the nexus, without silos, and without a clear continuum from response to recovery (Wall and Hedlund, 2016; Corbett et al., 2021).

Our interviewees were able to tell us about some interesting projects that are emerging from these initiatives and that might not have been thought of otherwise. These include a response fund used towards building back civil society in Palestine; and a micro-fund within a Kenyan village, where a women's group has set up a small restaurant on a path used by traders and uses the profits to start other small businesses.

The value of this approach lies in its flexibility and the contextualisation of the response to each setting — sometimes even to different interventions within the same village. This has again raised questions about scalability within the existing institutional structures of the international aid system — which is set up to deliver scale, not customisation.

4.2 Key attributes of supporting locally led action

Previous work for ALNAP on setting a learning agenda for localisation identified three key attributes that can make up the spectrum of localisation to locally led action and that actors can reflect on to determine whether they are moving further towards locally led programmes or not. These are: 1) agency and power, 2) resources and 3) ways of being (Baguios et al., 2021). These continue to be key determinants of this approach.

1. Decision-making power

The most prominent attribute of locally led action that emerged through the scoping study is decentralised decision-making power — the ability for those closest to the affected communities to control how resources are used, how programmes are designed, and who is involved. Even the transfer of financial resources does not necessarily guarantee this designation of power; although some interviewees did cite 'money leaving the INGO's account and reaching that of the implementers' as a basic fundamental of this approach.

Moving the needle within this dimension means a stop to imposing pre-conceived notions and standards of how programmes should be designed and delivered. This starts as early as the initial needs assessments. As one local practitioner from Asia commented, 'We have to go with the pre-mindset to ask questions related to the funding proposal. Often not really to listen to communities. It's not goal-free, it is goal fixed.' Yet this kind of thinking is counterproductive, often resulting in assistance that does not meet the actual needs of the community.

It also means flexibility around how programmes are designed and tracked. An ideal scenario would mean that initiatives may differ quite dramatically from one area to another. Aggregating and reporting on these will also mean flexibility in monitoring systems.

2. Access to and utilisation of resources

Access to resources is another key attribute on the localisation to locally led spectrum. At the bare minimum, this includes quality funding (see Section 2.1.2); however, it goes beyond financial resources alone, to encompass skills, materials and operational abilities. There are also resources that exist within the ecosystems around affected communities, including local government, businesses, services and civil society (see Figure 1). These strengths and networks need to be leveraged within the humanitarian response.

3. Equitability and ways of being

Shifting the lens towards locally led action also means questioning whether these changes can actually take place within the existing structures of the international system. Sub-contracting relationships have become so embedded in the sector that few frontline organisations have ever really experienced an equitable partnership.

The power imbalances are deep-seated, and the default (presumed right) ways of being and working continue to be dictated by the Global North. This includes broader issues such as how 'local staff' are treated, but also the ways meetings are conducted, the languages spoken, who yields when compromise is needed, and adherence to priorities that might not be relevant to the context at all. This is not an issue that is unique to the humanitarian system. To be a 'good partner' and to retain these relationships still — in many cases — means adhering to and meeting the standards of the North.

But accepting and dealing equitably with different ways of being also requires investment — and that needs to happen *before* an emergency strikes. This is often seen more from a compliance perspective, but the softer skills of trust and understanding take time to build on both sides. Greater trust results in more innovative and more useful programmes. This point was brought up frequently by key informants: where innovative programming or more equitable partnerships occurs, it is with partners with whom a relationship has been built up over time — and this cannot happen in a three-or six-month project cycle.

And this is where some question whether a more radical approach that tackles colonial legacies, inequity and racism is required. Without addressing these much less tangible, but extremely important, issues, there is little expectation that the discourse will result in meaningful change.

5. Setting out a research and learning agenda for localisation/locally led action

5.1 Where are the learning gaps?

One of the questions posed to key informants across the scoping study was whether — and where — they saw learning gaps around the shift of power to local actors and those closer to affected communities. From this enquiry, three sets of learning and evidence challenges emerged, which we have used to inform a proposed research and learning agenda:

- The impact of localisation on humanitarian performance. Research in this area would help address learning gaps in the existing priorities of the formal international system.
- The broader value-add of locally led humanitarian action. This would allow alternative viewpoints that are missing from the current literature to be researched and amplified.
- Operational processes and barriers. This research stream would help address questions around 'how' to localise and better support locally led action, looking more directly at some of the incentive and operational barriers and potential solutions. Within this set we also include some miscellaneous topics that emerged from our findings.

5.2 Localisation and impact on performance: Towards an evidence base

How do we measure the actual change with shifting between international and local organisations and having it be more locally led? We've struggled. Because we can show adjustments and changes that organisations have made in terms of the compliance and policies and procedures and blah blah blah, but how do we show how the impact has changed on the ground?

- INGO representative

The literature and research around localisation have focused primarily on tracking commitments in the Grand Bargain — most notably on funding. There has been little investment so far in tracking the impact of localisation or locally led responses on humanitarian performance and outcomes for crisis-affected communities (Barbelet et al., 2021).

There are inter-agency monitoring reports and individual organisational case studies on work with 'local partners', but little that focuses on broader questions around the impact for those on the ground. This narrow focus means that stakeholders often take the line that localisation is 'the right thing to do' — but then cite a lack of evidence or difficulty operationalising as reasons to sidestep obligations.

Where there *is* research and evaluation looking at the links between localisation and humanitarian performance, the focus has been primarily on 'efficiency' metrics. In other words, on evaluating the ability to deliver the same type and quality of response through local actors for less money.

It is understandable, given current scenarios, why this drive for comparative evidence exists. At a time when questions around prioritisation, shrinking budgets and growing needs are on the rise, hard economic evidence of why these approaches are useful might help move the needle on the desired shifts.

For instance, one recent study estimates that shifting 25% of UN/INGO official development assistance directly to local intermediaries would result in cost efficiency savings of USD 4.3 billion annually: a cost saving of 32% for every dollar reallocated. Interestingly, this is after correcting for salary disparities that exist between the international and national staff, as well as accounting for more equitable overhead costs (Venton et al., 2022).

Return on investment studies are certainly useful for many audiences. Although they are only part of the picture, they can help improve delivery over time. This suggests that efficiency may be a possible focus for a broader learning and evidence programme on localisation and performance.

Yet such research would need to stay cognisant of the limitations and risks — and find ways to counter them. Firstly, there is very poor data on common efficiency measures in the system more widely and efforts to collect this kind of evidence in a meaningfully comparative way are hampered by competition and a lack of transparent data sharing (ALNAP, 2022a). This weak foundation for data on efficiency in the humanitarian system makes it difficult to identify any baseline against which to compare new or evolving practices — a significant challenge that the sector has faced in other areas, such as developing and scaling innovations to improve efficiency (Obrecht and Warner, 2015; ALNAP, 2023b).

Additionally, efficiency gains are frequently framed in terms of the outputs of direct international implementation contrasted with using local actors as sub-contractors, which is increasingly seen as a problematic practice that prevents more meaningful shifting of power. Measuring in this way also tends to lead to pressures to engage in efficiency practices common to the international sector, which can be quite disruptive to the ways in which local actors work, the primary examples being scale and silos.

Finally, attribution is another impediment to comparing locally led action to internationally delivered support. From the view of affected families, humanitarian support tends to be delivered on a spectrum. Some of it might come from the government, some from their neighbours, or a local NGO, and some from international aid. Given the complexity, it is also hard to link specific ways (or means) of working to particular outcomes or performance criteria (HAG et al., 2023).

So, a research agenda around localisation and humanitarian performance could ask: What is the impact of current localisation practices on humanitarian performance — is it cheaper, faster, more accountable?

At the same time, in order to address some of the nuances we've just discussed, it could seek to question whether these are even the right metrics to judge performance — or are there other, more locally embedded indicators of performance we should be using?

As one interviewee commented, 'What are the standards and the ways of working that affected communities cherish? I think that's an area that would also be useful for us to counter the existing narrative.'

5.3 Determining the broader value of locally led action

We often talk about evaluations that are being done, maybe a year or two from the onset of disaster. But no one actually goes back to the community, say four or five years down the road and asks, how did you recover, what was the critical social capital that helped in your recovery process? What was the value that had to be recreated during this recovery process and who was in the leadership of that sort of recovery scenario?

- Representative of a network of national NGOs

Locally led ways of working are supposed to offer many contextual performance benefits that would impact its value for money — not just in the lifecycle of a project, but over the longer term.

Yet, currently, the focus remains on who gives and who gets funding, and on the outputs created. It centres on the importance of reporting against a sum of money given to a single organisation and the supposed value they bring by using those funds, rather than the broader impact over time at a community level. It is, as one INGO representative commented, the 'theatre we perform'.

Some of the key informants felt we need to question how we see learning and the stories that we tell. 'A lot of the evidence that is drawn from the humanitarian sector tries to be nonbiased and nonpolitical, and all the issues we're talking about are biased and political', said one NNGO network interviewee.

Giving up these current narratives and stories is a challenge — and there's a fear that they *cannot* be given up without losing funding or jobs. So, we need stories to replace this, but this proves challenging within the sector's current constructs. For instance, customised, community-led programming loses its meaningful nuances when aggregated into the large 'outreach' numbers that the sector often demands; and programme budgets rarely allow a return to communities to look at impact years down the line.

To move the focus more towards collective outcomes for communities, a shift in how we frame narratives around locally led action would be useful. These stories already exist anecdotally at a grassroots level. Fundamentally, locally led action allows for assistance that is tailored to the needs of the community, resulting in less waste and more sustainability. As our interviewees corroborated, the broader value-add — most of it anecdotal — has an impact on carbon footprint; on creating more democratic relationships within communities; on strengthening skillsets; and even, at a more emotional level, on restoring hope (Gupta and Viswanathan, 2020). It also has links to broader conversations around accountability, risk reduction, and the nexus.

This type of research would need to be a long-term, qualitative analysis around the broader value-add of locally led humanitarian action. It would help address gaps in the current narrative and allow for alternate viewpoints — amplifying knowledge around **how** locally led action plays out in practice across different settings.

To move the focus more towards collective outcomes for communities, a shift in how we frame narratives around locally led action would be useful.

It would also need to draw on methods such as qualitative comparative analysis, which enable the cross-comparison of large volumes of case-based evidence to identify patterns and trends. Building a databank of best-practice examples could lead to context-specific and cross-context evidence on common performance indicators. This would also help build guidance on how to better measure and aggregate impact when looking at locally led action.

5.4 Operational processes and barriers

The other evidence/learning gaps that emerged from our research were primarily around operational issues. Good intentions and policies are one thing, but putting them into practice is another. While many in the sector can be quick to dismiss the lack of progress on localisation as being due to political barriers and lack of will, there are actually a number of operational gaps.

These include instrument design to get funding to local organisations in the best way possible; the ways that internal operational processes (strategies, key performance indicators, targets, incentives) support or challenge the broader policy; and the processes of building an equitable partnership, including awareness of good practices and areas to avoid.

Many key informants in our scoping study expressed their struggles with these practicalities. And while several organisations are working internally, or sometimes in inter-agency technical groups, on ways to deal with some of the gaps, there are also broader lessons that can be drawn and shared across the sector on the question of 'how' to localise and better support locally led action.

Finally, then, based on these operational issues and other gaps that emerged from our findings, we suggest the following possible topics for a learning and research agenda:

- Incentives to take locally led action forward. In addition to the discussion around identity challenges (see Section 3.7), there are deeper issues that could be explored around the topic of incentives – perhaps through the facilitation of peer learning and different ways of managing change.

- Changing role as intermediaries: moving from direct implementation to equitable partnerships for the long term. As parts of the system push for a shift to more locally led approaches, it is also clear that there is still a role for the UN system and INGOs. Building this complementarity may require a shift in the role that these actors play and their ability to serve as a trust-builder for their partners with donors. How can 'equitable partnerships' – a phrase that comes up across policy documents, but that in reality has seen little traction on the ground – truly be achieved?

- Quality funding to local/national actors: pass through of multi-year, unearmarked funding and overhead costs. Multi-year, institutional development of local and national actors is emerging as key to any localisation efforts. Whether this takes the form of more flexible funding, more ICR, or new approaches to capacity sharing, this is a gap that is still felt, particularly in contexts of increasing national restrictions. In what ways is this is being tried, and can a common baseline be established across the sector?

- Due diligence and risk sharing. Although interesting pilots and workarounds are being tried in the area of due diligence, policies don't always translate into practice. How can this be done in ways that allow for more constructive and easier engagement with the system, while still being cognisant of organisational and statutory requirements?

- A more coherent narrative of localisation across the sector's other commitments. Despite being fundamental to ways of working, the narrative of 'localisation' is still not being mainstreamed across other commitments made by the sector, including the Sendai Framework and the Sustainable Development Goals. Undertaking research that pulls these strands together will make it easier to work more cohesively.

5.5 Whose evidence matters?

Not only should there be more evidence around locally led action, but that research should itself be locally led. What does such research look like, and can different forms of evidence gain validity?

A subset of the debates around localisation and locally led action represents a reckoning with the way research literature is usually looked at in the sector. There is an implicit valuing of one style of evidence (empirical, quantitative, often sleekly written and published) over others (anecdotal, storytelling, oral traditions). This puts many of the nuances that exist within non-Western traditions at a disadvantage. Much of the evidence around locally led action, for example, is held as anecdotes and stories in the heads of those who have worked on it.

These findings are supported by other literature reviews and reports, which acknowledge that the scope of localisation research needs to be both expanded and diversified. Currently, it's known that '...the conditions that prevail in the sector's forums mean that the knowledge produced about and for these forums marginalises Global South actors' (HAG et al, 2022).

This imbalance manifests in several ways, as detailed in a report by Tufts and NEAR, which finds that Global South researchers are at a disadvantage not just because of funding constraints and power dynamics, but also the '...unfounded assumption that, if humanitarian research is Global South-led or if Global North researchers are not involved, the research must necessarily be less robust, the results less credible and less impactful' (Fitzpatrick et al., 2023).

...several Southern-based practitioners who took part in this scoping study questioned what is being asked, who is being asked, and whether the sector is even really willing to listen to the answers.

There are also broader calls for more equity-orientated evaluations, in light of the assertion that, '...the way that international cooperation initiatives are evaluated perpetuates structural and historical inequities at the global, regional, national, and local level' (Global Change Center et al., 2023).

Related to this issue, several Southern-based practitioners who took part in this scoping study questioned what is being asked, who is being asked, and whether the sector is even really willing to listen to the answers. This has also been reflected in research around tacit (or experiential) knowledge of frontline workers that organisations fail to take into account in learning (Doherty, 2022).

This poses a critical challenge to research organisations and networks working on these issues who are based in the Global North (as is, for example, ALNAP's own secretariat). It brings up questions as to whether these actors should play more of a supporting role, allowing national and regional organisations to be in the lead when it comes to learning around this theme. Addressing these questions could allow for a more diverse and inclusive library of literature around locally led action, and could begin with small steps, such as:

• Funding and supporting local and national organisations to carry out learning and research, allowing them to determine the most compelling issues, the research agenda, and the best ways of working.
• Building and working with a more diverse roster of consultants and researchers.
• Expanding the notion of 'rigorous evidence' to include non-written and qualitative modes.
• Exercising awareness of being extractive and always adhering to the principle of 'no research about us, without us'. Ask: Does this research serve the objectives of the Global North while imposing time and resource demands (often unfunded) for those based in the Global South?
• Limiting jargon, and finding ways to use vocabulary that translates more easily.

6. Conclusion

The humanitarian sector is currently at a precipice. Humanitarian needs are growing and becoming more complex, budgets are shrinking, and the political and civic environment is increasingly hard to navigate. Against this backdrop, commitments to localisation and locally led action are being seen as both a way forward and as a challenge.

Drawing together the various threads, a few key insights emerge from this scoping exercise. For ALNAP and other organisations, these are some of the considerations that must be kept in mind as they move forward with work around this theme.

- The **persisting, growth-based, competitive model** of the sector poses a direct challenge to localisation commitments made by its organisations. There is a tendency to shift blame to a different set of stakeholders (INGO to UN, UN to donors, and so on) — arguments that also continue to play out in Grand Bargain discussions.

- Technical fixes, including policies and operational guidance, are not enough to ensure localisation commitments are met. Deep-seated insecurities around **power and identity** emerge as some of the greatest barriers to faster progress on this issue. Change processes must take these fears into account, and deal with them head-on, if the sector is really going to transform.

- Locally led action has always occurred and continues to happen in most affected areas and communities — only some of which is aided by the formal international humanitarian aid architecture. Turning the lens from localisation to supporting locally led action will require the sector to truly **challenge its current ways of working**.

- Most of the current learning and evidence focuses on the progress made towards modifying the existing humanitarian system, and the extent to which localisation commitments have been fulfilled. There has been little **focus on the impact** of localisation or locally led action on humanitarian performance and **specifically on outcomes for crisis-affected families**.

- Whose evidence matters? There is an **implicit value imbalance** between accepted 'Northern-led', empirical research reports and the anecdotal evidence or lived experiences of local frontline workers, which is so often in non-written form.

- Finally, none of these conversations and ideas are new. They have been ongoing for decades in different forms, even before it was brought to the fore in the World Humanitarian Summit discussions. That, in itself, is revealing. The many nuances that link into this issue make it an acute sticking point. It weaves across several challenges that exist within the humanitarian space — from the ways of working to the entrenched power structures. Moving the needle in ways that actually help communities in crisis will require more holistic work on this topic.

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