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Towards **G**reater **E**ffectiveness and **T**imeliness
in **H**umanitarian **E**mergency **R**esponse

WE STILL NEED TO TALK

THE STATE OF LOCALISATION IN BANGLADESH

AUTHORS

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The research was conducted by Smruti Patel and Koenraad van Brabant of the Global Mentoring Initiative (GMI) in collaboration with Abdul Latif Khan and written by Koenraad van Brabant. GMI has authored several analyses on localisation and developed the Seven Dimensions Framework for the START Network.

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EXECUTIVE SUMMARY

THE RESEARCH

This research was commissioned by the ToGETHER consortium of four German humanitarian NGOs (Caritas Germany, Deutsche Welthungerhilfe, Diakonie Katastrophenhilfe and Malteser International). It is part of a series of eight country studies and a comparative analysis with other reports on Colombia, the Democratic Republic of Congo, Ethiopia, Indonesia, Myanmar, Pakistan, and Somalia. The analysis aims at informing the programme's efforts to advance localisation in Bangladesh. Furthermore, it contributes to a wider translation into practice of the commitments that international agencies have made to support and reinforce rather than replace national and local crisis responders in their countries.

The guiding questions are:

- Is there an emerging in-country consensus for understanding and measuring localisation of humanitarian aid? Which understandings exist among humanitarian actors?

- Which localisation initiatives and programs took place or are taking place in Bangladesh? How can overlapping be avoided and how can synergies be used?

- Where are in-country actors making good progress and what are the most significant challenges for the realisation of the key areas of commitment in the localisation workstream: partnerships, financing, capacity development, coordination and complementarity, and gender? What are important drivers or constraints?

- What institutional-, policy- and political dynamics influence these challenges?

- What are the most urgent strategic issues and challenges that need to be addressed to realise substantive, transformative change?

The research faced various conceptual, practical, and ethical challenges:

- 'Localisation' is still poorly understood and there is little understanding of the why, why now and the practical guidance that can be found in the Grand Bargain and Charter for Change (C4C). It is sometimes misunderstood as only applying to the operational level and in the collaboration of individual international relief agencies with their local 'partners'. The term is used with different practical interpretations, which lead to different outcomes, several of them in contradiction to the purpose and spirit of the Grand Bargain. Although the topic has been thoroughly researched and discussed since the World Humanitarian Summit in 2016, there is globally remarkably little use of frameworks that help to understand localisation, that structure the discussions around it and the way it is going to be put into practice.

- Since late 2017, the internationalisation-localisation dynamics in Bangladesh have become twofold: one around the Rohingya/FDMN (Forcibly Displaced Myanmar Nationals) in Cox's Bazar, the other taking shape in the 'rest of the country,' leading to more research, and thus a longer report.

- All research was done on a limited number of days during the COVID-19 pandemic in

the summer and autumn of 2020. For health reasons, all conversations were conducted online. GMI has worked with institutional donors, various UN agencies, INGOs and Bangladeshi national and local CSOs (including women-focused and women-led ones). Other partners include the Humanitarian Country Task Team, the NGO Affairs Bureau, the Refugee Relief and Repatriation Commissioner (RRRC), the Deputy Commissioner's Office in Cox's Bazar, the Intersectoral Working Group and various cluster leads in Cox's Bazar, NGO coalitions such as Start Fund Bangladesh, Bangladesh CSO platform, Cox's Bazar NGO and CSO Forum and the National Alliance of Humanitarian Actors Bangladesh. GMI has also listened to Rohingya refugees, people in the flood-prone areas of northeast Bangladesh and in the Sundarban area of southwest Bangladesh. Their work provided the opportunity to update and enrich earlier learning.

- All over the world, national and local actors are increasingly frustrated that localisation has been extensively researched and debated for the past four years, yet they see little or no changes in practice. This study hopes to add value in three ways:

  - It includes the 'eco-system' perspective which, to our knowledge, is rare.

  - It uses several varying frameworks, ranging from the strategic to the operational.

  - Inquiring more from the perspective of national and local actors, than of internationals – which are more easily heard in international circles.

KEY FINDINGS

With its own governmental and non-governmental capacities and leadership, Bangladesh has made great progress in managing the recurrent disasters of recent decades. Many Bangladeshi CSOs have a rights-focus, and strong experience with community-based work. By 2015, they directly or indirectly received a significant proportion of international aid. The Manusher Jonno Foundation is an established example of a Bangladeshi CSO acting as fund manager for international aid. Relevant expertise is also available in several universities, though the link between operational agencies and academia could be stronger.

The trend of advancing localisation altered very quickly during the massive international mobilisation in response to the latest Rohingya/FDMN refugee crisis in late 2017 and early 2018. Large-scale international support became necessary and overall has been remarkably successful in preventing major morbidity and mortality among the refugees. The way the international agencies operated however, resembled the 2004 Indian Ocean tsunami response, once again overwhelming local and national actors. 'Building on rather than replacing national capacities' – an almost 25-year-old commitment affirmed publicly some 15 months earlier during the first World Humanitarian Summit, was neglected by many international agencies. From the perspective of Bangladeshi civil society leaders, it reversed localisation gains by a decade, and revived international agencies also in the rest of the country. An additional and parallel international coordination system was set up, leading to a dualistic situation in Bangladesh that continues three years later.

By late 2020, some renewed progress is noticeable in Bangladesh beyond Cox's Bazar: Relevant developments have been triggered e.g. by the Start Network in Bangladesh and Oxfam's ELNHA project. Also involved are various networks focused on humanitarian action, such as the National Alliance of Humanitarian Agencies in Bangladesh (NAHAB), the Bangladesh Women's Humanitarian Platform at national level, the Voice of Women Humanitarian Organizations Network in the southwestern coastal belt and the Humanitarian Actor/ Alliance Platform in Kurigram. In the summer of 2020, a Localisation Technical Working Group was formed under the Humanitarian Coordination Task Team, providing a space for multi-stakeholder exchange and momentum to drive localisation. The 'baseline' assessment of flood responses in 2019 through a localisation lens, has shown the practical utility of a 'seven dimensions' framework, and reportedly is being introduced within the broader interagency system. It can be complemented by the collective system's perspective of the HUCOCA framework, developed by F. Almansa and piloted by Oxfam. Both frameworks can be further refined by the framework on localisation in coordination, developed by the Global Protection Cluster, and the power awareness tool, that PARTOS/Spindle developed in 2020 (PARTOS/ The Spindle 2020). However, localisation by design needs to be driven by a vision of what success will look like, notably in terms of collective Bangladeshi capacities and leadership and hence role changes for international actors.

The localisation process is being linked with one of decentralisation, with the district as a unit, though some argue that it should go down to the sub-district administrative levels. This implies bringing all stakeholders at district level together for joint preparedness planning, joint assessments and coordinated responses. It corresponds to the view of several Bangladeshi CSOs of the primacy of the local actors. One challenge for the public sector actors is the lack of resources and the mandatory rotation of civil servants. Since disasters tend not to respect district boundaries, coordination between districts and the roles of national Bangladeshi actors need to be further clarified.

At a deeper level, there is also a tension between a more bottom-up, district-based vision of localisation in Bangladesh, and a globally mobile international relief sector.

For Bangladeshi CSO activists, however, localisation is not just a 'technical' issue. There is strong awareness that this is about power and the control of resources, which has been recognised also in e.g. the Start Network Bangladesh and Oxfam's work. This turns localisation also into a 'political' issue. Two areas where this plays out are in providing or sharing flexible management fees for the Internal Cost Recovery of Bangladeshi CSOs, and in the dispute over INGOs 'nationalising' their country offices, or national organisations being linked to international federations or families. These two issues are on the table in other countries as well.

Regarding the situation of the Rohingya/FDMN and the host population in Cox's Bazar district, the question of internationalisation and localisation is currently more of a positional debate rather than a constructive dialogue. This is the result of an international relief system that sees itself as technically and morally superior, encountering a knowledgeable, organised and vocal Bangladeshi civil society. Unlike in various other countries, Bangladeshi CSOs were active advocates for localisation already prior to and during the World Humanitarian Summit. They take the Grand Bargain, Charter for Change and comparable processes and commitments under the heading of 'aid effectiveness' seriously. They expect the international actors, who voluntarily signed up to them, to do the same. Their criticism focuses on the extremely high costs of the international surge and continued modus operandi, and the lack of transparency about how money is spent. They have strong reservations about the establishment of a UN-led coordination system largely separate from the government structures and the massive and unethical recruitment of locals to achieve surge success. They question the very variable qualifications and high turnover of international staff, their lack of contextual knowledge and the predominant pattern of an instrumentalization of CSOs into service-delivering contractors or 'implementors' rather than 'decision-making' partners. They also see the UN (in general) as expanding more and more into running its own projects and programmes, many of which can and should be done by local and national actors. They also downplay the critical roles and contributions that international actors played in avoiding massive morbidity and mortality among the refugees, criticising that these more or less built a shelter-city in a not very suitable location within months. One does have to concede, however, that even with the logistical capacities and the critical role that the Bangladesh army played, this major feat would not have been possible without international support.

International actors in general argue that local and national actors may have much experience with natural disasters but not with refugee situations. They claim that they have a lack of thematic/technical expertise in areas such as protection, gender, camp management or working in a context of conflict-sensitivity. They may be too closely connected to the host populations to effectively balance tensions between them and the refugees and – being used to working closely with and complementing the government – might be ambivalent about how they will position themselves in case of a relocation or repatriation that is not voluntary and not to a safe destination. Given the decades-old history of Rohingya refugees in Cox's Bazar, those concerns are a reality. Also not fictional is the scenario of a gradual neglect and reduction in basic services, making life for the refugees so unpleasant that they will 'want' to go elsewhere.

International actors tend to downplay the fact that they heavily 'de-capacitate' local and national organisations by hiring away many of their experienced staff. They tend not to see that coordination practices are not enabling for most of them and that they are providing sub-grants in which international agencies set staff limits and -salaries and decide what equipment the grantee can have. Local and national CSOs do have more programmatic and thematic/technical expertise than is portrayed, and there is little appreciation that many have a long experience with rights-based community-work. Regarding ambivalent feelings about refugees — these can also exist among the Bangladeshi staff of international agencies, and the claim to the moral high ground of humanitarian principles does not stand up so well when we look at the international community's lack of attention towards the Rohingya in general, including in Bangladesh, over most of the past 40 years.

Both perspectives hold partial truths. What is missing is an atmosphere for constructive dialogue.

The issue of localisation around the Rohingya/FDMN response has been raised as early as December 2017, and the Grand Bargain Localisation Workstream mission raised it in September 2018. However, three years later there is still no functioning space or reference to translate the process into reality. Particularly among INGOs, some changes are gradually taking place, but they seem to be driven mostly by a gradual reduction in funding. That is 'localisation by default', not 'localisation by design.'

A 'Localisation Task Force' for Cox's Bazar has had no Bangladeshi co-leadership, and for a year now, a 'Localisation Roadmap' has been under discussion and development but remains without finalization and official endorsement. While it contains many valuable insights and practical recommendations, the roadmap's fundamental notion of localisation seems to follow the definition of international agencies: Localisation occurs when an activity formerly performed by an international actor with a certain skill set is taken over by a local actor having a similar skill set. Given that international agencies have access to more and better-quality finances, and constantly shift the goalposts in terms of compliance requirements and technical standards, this is a no-win proposition for most Bangladeshi organisations. It does serve the international agencies well, however, when they need a justification for more funding for their 'capacity-building' of Bangladeshi CSOs. The draft Roadmap would have benefited from drawing more on the experiences and developments in the rest of Bangladesh, from including a more historical perspective on the situation of the Rohingya in Cox's Bazar, and by pointing out some scenarios for the medium-term future that include a drastic reduction in international aid. Any Roadmap of whichever quality will probably not gain much traction, however, if the relational atmosphere does not improve. Repeatedly made suggestions about having 'facilitators' help with the difficult conversations have so far not been taken up for example. Now, a 'localisation driver' has been proposed, a role held by a team rather than one person. With backing from the government and key actors, this team has the legitimacy, if not the formal authority, to act as an enabler and to monitor the progress of the Roadmap's implementation.

It may turn out to be difficult to assemble such a team and hope for its broad backing. Key in the whole issue is the government. National governments determine which role they will play in a crisis themselves, how much space they give to their own civil society actors (and the

private sector) and how much to international aid agencies. So far, the government's position has been shaped by at least three considerations: First of all, integration of the Rohingya refugees in Bangladesh is not an option – their stay can only be temporary. Also, there is a belief that the solution lies in Myanmar, hence the refugee situation must remain internationalised with international actors convincing the government of Myanmar (and its military) to change its behaviour. Thirdly, international aid is required to mitigate the costs of hosting a million refugees. Though its policies have restricted aid interventions that might create more 'permanent' situations, the government has allowed large numbers of international agencies to come in and to a significant degree 'take over.'

A strategic game-changer related to internationalisation and localisation in Bangladesh could come from the government now demanding that the international presence should also serve to strengthen Bangladeshi institutional and organisational capacities. These should become better equipped to handle crises with humanitarian consequences, including refugee situations. This would become a legacy objective for international agencies to achieve before they scale down. Two factors may influence this demand: Does the government believe that it can maintain enough international political attention and generate enough aid with fewer international agencies or a smaller number of international staff in leading roles? Secondly, how will the government see Bangladeshi CSOs that take a firm rights-based stance, also in support of refugee rights?

On a more operational level, this assessment identifies well known issues related to key dimensions. No generalised statements do justice to the quality of the various relationships between international and national/local actors in Bangladesh. However, the predominant practices of 'partnering' in emergency responses do tend to establish a domination-subordination situation not conducive to equitable partnerships. One does have to note that regarding access to financing, there has been quite a bit of direct funding of Bangladeshi CSOs outside of or prior to the latest Rohingya crisis. This quality financing (e.g. through a flexible management fee) is critical and cannot be dissociated from the ability to strengthen and retain organisational capacities. A major strategic issue for Bangladeshi CSOs is their dependency on international aid and the possible financial shock should Bangladesh become formally recognised as a 'middle-income country.' The opposition to INGOs 'nationalising' their country offices also needs to be understood in this light. Bangladesh shows that longer-term, internally driven capacity investment, but also capacity sharing (between Bangladeshi actors as peer-learning, and with international agencies) produces more sustainable impacts than the short-term, one-off, and fragmented 'training' that international relief agencies offer in a supply-driven manner. Capacity-support resources, both individual and institutional, are available in Bangladesh and are preferable to most international 'trainers.' As far as coordination structures are concerned, Bangladeshi CSOs are part of the HCTT and the SEG at Dhaka level, but not part of the senior circles of the international coordination set-up in Cox's Bazar. Presence at these tables is the first step, meaningful participation another one. Much can depend on the style of those chairing meetings, but the members and participants of course play an essential role. Women-focused and women-led organisations in Bangladesh are still struggling to get funding and to be able to participate meaningfully in broader inter-agency spaces. While they want to be recognised on merit, the question whether affirmative action is needed, is also on the table.

MOVING FORWARD

The report identifies three potential game changers:

1. The key game changers are the international donors and their humanitarian advisors. Some factors shaping their behaviour regarding humanitarian aid are: short-termism, fear of fraud and corruption, political attention in their home countries, overall aid budgets and the need for intermediary fund managers as they cannot, with their own staff, handle a multitude of contracts. In this context, Bangladeshi CSOs can show more actively how they can and will handle these concerns just as well as international agencies, not just claiming against Grand Bargain and other commitments. They can redefine the value-for-money argument by showing how the high costs of the past three years are simply not sustainable, and how they can operate at lower costs reaching a fairly equivalent effectiveness. However, Bangladeshi CSOs need to clarify their potential positions when their government acts on the Rohingya/FDMN in a manner that disregards the refugee's fundamental rights.

2. The government of Bangladesh is a second key actor that can change the game, acknowledging that it may want a balance between internationalisation and localisation to keep the Rohingya refugees a matter of international concern. A clearer vision of what 'success' or perhaps 'significant progress' would look like, say in the next 3 – 5 years, may help.

3. A third potential game changer is the institutionalisation of localisation commitments made within international aid agencies – UN and INGOs alike. Child protection, zero tolerance for fraud, PSEAH and gender equity are all policy- and practice issues that are not at the discretion of the senior managers and -advisors at country level, nor should localisation be. Organisations unable or unwilling to follow through, should withdraw their formal endorsements of these commitments.

For 'the rest of Bangladesh', one has to discuss how to complement the HAG framework and admit that it will be inevitable to conduct difficult conversations about nationalising INGOs. For the Cox's Bazar situation, the key blockage is the tense atmosphere. While this will not change so easily, some conversation spaces can be created for a sustained and constructive dialogue of the willing. Both international and Bangladeshi agencies will need to practice more listening with empathy to each other, which is the basis for equitable relationship building. The different dynamics thus nurtured will eventually begin to influence the prevailing ones. Last, but not least, everyone needs to engage extensively with both Rohingya and host populations and work with them to go beyond 'problems' and 'complaints' – to find those improvements that are achievable under constraining circumstances.

For the participation of more Bangladeshi partners in the ToGETHER programme, the authors recommend engaging organisations that are 'home-grown' and not linked to international alliances, federations or the like. They should be rights-based and not just service-deliverers, take responsibility for their own organisational development and strive to reduce their dependence on international aid by increasing their domestic resource base. This also implies that they need to address the question of their principles, particularly regarding minority- but also refugee rights, proactively.

At the broader strategic level, the consortium can help Bangladeshi CSOs to strengthen their evidence-based advocacy but also to become more propositional towards international actors by putting well-thought through, concrete proposals and options on the table, if international agencies are not doing so, or do not come up with anything serious. It can explore complementarities and synergies that the CSOs might have with relevant initiatives such as the Start Hub Bangladesh, Oxfam and other committed C4C signatory INGOs. The consortium can also promote the various frameworks mentioned and their application. Last but not least, it can perhaps play a role in creating or supporting spaces for a constructive dialogue with a coalition of the willing, acknowledging that its member INGOs also come with interests of their own.

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ACRONYMS

ASEAN	Association of South East Asian Nations
BDCSO	Bangladesh CSO NGO Coordination Process
BNNRC	Bangladesh NGOs Network for Radio and Communication
BRAC	Bangladesh Rural Advancement Committee/Building Resources Across Communities
BWHP	Bangladesh Women's Humanitarian Platform
CAFOD	Catholic Agency for Overseas Development
CCNF	Cox's Bazar CSO and NGO Forum
CDAC	Communicating with Disasters Affected Communities Network
C4C	Charter for Change
CHS	Core Humanitarian Standard
CSO	Civil Society Organisation
DEPP	Disasters and Emergencies Programme (Start Network)
DMB	Disaster Management Bureau
DRR	Disaster Risk Reduction
ECHO	European Civil Protection and Humanitarian Aid Operations
ELNHA	Empowerment of Local and National Humanitarian Actors
FDMN	Forcibly Displaced Myanmar Nationals
GIHA	Gender in Humanitarian Action Working Group
GMI	Global Mentoring Initiative
HAG	Humanitarian Advisory Group
HCTT	Humanitarian Coordination Task Team
HUCOCA	Humanitarian Country Capacity Analysis
IASC	Inter-Agency Standing Committee
IASG	Inter-Agency Steering Group
ICR	Internal Cost Recovery
ICNL	International Centre for Not-for-Profit Law
ICVA	International Council of Voluntary Agencies
IFRC	International Federation of the Red Cross
INGO	International Non-Governmental Organisation
IOM	UN Migration Agency (previously International Organisation for Migration)
ISCG	Inter Sector Coordination Group
JICA	Japan International Cooperation Agency
JNA	Joint Needs Assessment
JRP	Joint Response Plan

LNHA	Local and National Humanitarian Actors
L/NNGO	Local or National Non-Governmental Agency
LTWG	Localisation Technical Working Group
MJF	Manusher Jono Foundation
NAHAB	National Alliance of Humanitarian Actors in Bangladesh
NARRI	National Alliance for Risk Reduction and Response Initiatives
NGO	Non-Governmental Organisation
NIRAPAD	Network for Information, Response and Preparedness on Disaster
ODI	Overseas Development Institute
PIANGO	Pacific Islands Association of Non-Governmental Organisations
PSEAH	Protection from Sexual Exploitation, Abuse and Sexual Harassment
RRRC	Refugee, Relief and Repatriation Commissioner
SEG	Strategic Executive Group
SHAPE	Strategic Humanitarian Assessment and Participatory Empowerment Framework
STP	Shifting the Power project
ToR	Terms of Reference
ToGETHER	Towards Greater Effectiveness and Timeliness in Humanitarian Emergency Response
UNDP	UN Development Programme
UNFPA	UN Population Fund
UNHCR	UN High Commissioner for Refugees
UN RCO	United Nations Resident Coordinator's Office
USAID	United States Agency for International Development
VOWHON	Voice of Women Humanitarian Organization Network

1 THE RESEARCH STUDY

1.1 PURPOSE AND KEY QUESTIONS

This research was commissioned by the ToGETHER (Towards Greater Effectiveness and Timeliness in Humanitarian Emergency Response) programme consortium of four German NGOs (Caritas Germany, Deutsche Welthungerhilfe, Diakonie Katastrophenhilfe and Malteser International). It is part of a series of eight country studies and a comparative analysis with other reports on Colombia, the Democratic Republic of Congo, Ethiopia, Indonesia, Myanmar, Pakistan, and Somalia. The analysis aims at informing the programme's efforts to advance localisation in Bangladesh. Furthermore, it contributes to a wider translation into practice of the commitments that international agencies have made to support and reinforce rather than replace national and local crisis responders in their countries.

The guiding questions for all countries were:

- Which understandings of localisation of humanitarian aid exist among humanitarian actors?

- Which localisation initiatives and programs took place or are taking place in the respective country? How can overlapping be avoided and how can synergies be used?

- Where are in-country actors making good progress and what are the most significant challenges for the realisation of the key areas of commitment in the localisation workstream: partnerships, financing, capacity development, coordination and complementarity, and gender?

- What institutional-, policy- and political dynamics influence these challenges?

- What are the most urgent strategic issues and challenges that need to be addressed to realise substantive, transformative change?

1.2 OPPORTUNITY AND CHALLENGES

Systems-perspective: The questions amount to a critical and reflective review of the state of localisation in Bangladesh. They invite a broad canvas or systems-perspective. This offers an opportunity that takes the localisation conversation beyond the bilateral relationships between an international relief actor and its partner(s). The research also considers contextual constraining and enabling factors. Most global research on localisation since the 2016 World Humanitarian Summit has tended to focus on just one aspect of it (e.g. funding, coordination, gender and localisation, risk management or governmental policy towards international operational presence) (GMI 2020b). There is, to the authors' knowledge, no significant precedent of a contextual systems-analysis focusing on the dynamics of internationalisation and localisation. This means that the inquiry itself is a learning journey. Since the large-scale influx of Rohingya refugees in the autumn of 2017, Bangladesh has found itself in a particularly challenging situation regarding the internationalisation-localisation dynamics. It now plays out in two different contexts: around the refugee-host population situation in Cox's Bazar district, and for the rest of Bangladesh. This turns the exercise into a double research.

Hypothesis: Although the Grand Bargain is a short and practical document with some very specific change commitments, and resources are available to understand the localisation debate (e.g. GMI 2017), GMI's working hypothesis is that significant confusion may persist: about the why and why now of 'localisation', what it means in practice and for whom, and what success would look like. That hypothesis derives from GMI's ongoing engagement with international and national/local actors at various levels and in various countries, showing this confusion do indeed exist. The country study will explore this hypothesis.

Scope: The question whether and where in-country actors are making good progress and where there are significant challenges is hard to answer when there are hundreds of multi-lateral, bilateral, national and local governmental and non-governmental actors. This becomes even more challenging when we want to examine the multitude of institutional-, policy- and political dynamics as well. These issues are everything but straightforward: it can be hard to know whether an agency's senior representative's particular 'policy stance' in a given country really represents institutional policy, or rather her or his personal views? Further, there can be significant differences between sub-national contexts within a country. Trade-offs therefore had to be made between broad scope and in-depth analyses of details and components. A broad canvas inquiry leads to broader observations that cannot capture all nuances and do justice to the multitude of different approaches and experiences.

Value adding: An ethical concern is that there have been many international conferences, national meetings, and research exercises on localisation since the World Humanitarian Summit. All over the world, local and national actors are seeing very little practical change, however, and several are becoming critical of yet more research in which they are consulted, again, on the same issues. This raises the question of the added value that this exercise offers. The system-wide perspective and the offer of frameworks with which to structure the understanding, conversations, and practices of localisation can add value.

1.3   METHODOLOGY

1.3.1   DEFINITIONS

Localisation is an issue with complex practical implications. It plays out according to different dimensions in the interaction between international, national, and local actors and affected populations at different levels. How localisation is researched will also depend on how it is understood.

'Localisation' as a term has emerged after the 2016 World Humanitarian Summit. However, many key issues in this agenda have a much longer history, e.g. the quality of partnership, capacity-support for national and local actors, and the latter's access to finance or meaningful participation in coordination structures. The same is true for the support for women's rights and women-focused national and local organisations. Moreover, international aid agency commitments to 'build on local capacities', go back to at least the 1994 Code of Conduct for the International Red Cross and NGOs in Disaster Relief. If certain practices have already been discussed for several years, we can allow ourselves the question whether they have evolved and if not, why they continue to be a discussion point.

The Grand Bargain is the most high-profile initiative to advance localisation in recent years. Box 1 displays some of the ways in which its signatories committed to promote localisation:

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Box 1. Localisation in the Grand Bargain (Grand Bargain, 2016:2,5,10)

Furthermore, this report makes use of the following assumptions on the underlying dynamics of localisation efforts:

Localisation needs to be understood in relation to internationalisation

Historically and globally, most crises have and continue to be managed with mostly local/ national capacities and leadership. The rise of a global relief industry, spearheaded by UN agencies and international NGOs, is a fairly recent phenomenon. Under certain conditions (major crises that receive international media and political attention, and where national governments invite international assistance), large-scale international crisis-response capacities are mobilised. The result may be a process of 'internationalisation', where international relief actors take over most of the strategic and operational decision-making as well as financial control of relief efforts, sometimes replacing and instrumentalising national and local structures. Localisation in that light is the effort to reduce and reverse such internationalisation where it is unjustified and counterproductive.

Localisation plays out at the organisational and systemic level

Achieving localisation requires efforts both at the organisational and at the systemic level. While a lot of research into the contributions of individual organisations towards localisation has been conducted in the past few years, this study will focus on assessing localisation progress at the systemic level. As such, it aims towards achieving a better understanding of the dynamics between different actors in a given country context.

National government plays a key role in shaping the dynamics

National governments have a major influence on the dynamics of internationalisation and localisation. The national government decides what role it wishes to play in the management of crises affected people on its territory: will it lead and if so, to what degree? It can set the overall policy framework, but it can also chair or co-chair coordination efforts, it can insist on vetting each project proposal and may or may not itself deliver relief services. National government determines the space and roles for its own civil society actors and for international relief actors. This varies between countries, can vary between different sub-national contexts, and evolves over time.

1.3.2 METHODS

Seven dimensions of localisation

The research looks at localisation as a multi-dimensional issue. In 2017, GMI developed the Seven Dimensions framework of localisation for the Start Network, which emerged from extensive conversations with local and national actors in different countries (Patel, S. & Van Brabant, K. 2017). The framework has been tested and is used, sometimes with adaptations, by several other agencies, networks, or research groups.

RELATIONSHIP QUALITY	PARTICIPATION REVOLUTION	FUNDING & FINANCING	CAPACITY	COORDINATION MECHANISMS	POLICIES AND STANDARDS	VISIBILITY AND CREDIT SHARING
• respectful and equitable • reciprocal transparency and accountability	• deeper participation of at-risk & affected populations	• better quality • greater quantity	• sustainable organisations and collaborative capacities • stop undermining capacities	• national actors greater presence and influence	• national actors can contribute to and influence global and national policy and standards-development, and their application in their contexts	• roles, results and innovations by national actors are given credit and communicated about by international actors

Diagram 1.   Seven Dimensions framework of localisation

The guiding questions for this and the other country assessments focused on four of the seven dimensions: quality of relationship, finance, capacity, coordination, and one cross-cutting issue: gender and localisation.

1.3.3 SOURCES

The sources for this report were a document review, including previous relevant research, plus studies and interviews. The latter were done on a limited number of days during the COVID-19 pandemic over the summer and autumn of 2020, all online. A series of webinars, organised by the Bangladesh CSO NGO network in the first week of October, was another source.

In Bangladesh, GMI has been engaging on localisation and participation of affected populations for many years now. The initiative has worked with institutional donors, various UN agencies, INGOs and Bangladeshi national and local CSOs (including women-focused and women-led ones). Other partners include the Humanitarian Country Task Team, the NGO Affairs Bureau, the Refugee Relief and Repatriation Commissioner (RRRC), the Deputy Commissioner's Office in Cox's Bazar, the Inter-sectoral Working Group and various cluster leads in Cox's Bazar, NGO coalitions such as Start Fund Bangladesh, Bangladesh CSO platform, Cox's Bazar NGO and CSO Forum and the National Alliance of Humanitarian Actors Bangladesh. GMI has also listened to Rohingya refugees, people in the flood-prone areas of northeast Bangladesh and in the Sundarban area of southwest Bangladesh.

2 THE CONTEXT

2.1 VULNERABILITIES TO CRISES WITH HUMANITARIAN CONSEQUENCES

Bangladesh is the second most disaster-prone country in Asia and the Pacific. More than 80 percent of the population is vulnerable to regular riverine floods, flash floods and landslides in the hilly areas, but also droughts. Its large coastal belt continues to be regularly hit by cyclones. Not to be underestimated however, is the risk of earthquakes, which could have a disastrous impact on densely populated urban areas. Major earthquakes struck Bangladesh e.g. in 1885 (Bengal earthquake) and 1918 (Srimongal earthquake). Fire is also a threat in various urban areas.

Climate change and population growth will likely further increase the country's exposure to these types of hazards and their consequences in the future. Bangladesh is the 8th most populated country in the world, with one of the highest population densities. This also makes the country very vulnerable to pandemics, as the COVID-19 situation has shown. The recent Rohingya refugee crisis has also had a huge impact on Bangladesh, as there are now about one million Forcibly Displaced Myanmar Nationals (FDMNs) in the country.[1] Although this is sometimes presented as a new type of crisis for the country, there have been significant numbers and waves of Rohingya refugees in past decades. One should also not forget that the violence around the creation of Bangladesh came with large numbers of refugees and internally displaced people (IDPs) – events that took place in living memory.

2.2 GOVERNMENTAL INSTITUTIONS, POLICIES, AND CAPACITIES

The Government of Bangladesh is an active leader in disaster risk reduction and preparedness efforts, as well as in managing the Rohingya response. Governmental institutions to manage disasters were set up shortly after the creation of the country. The Ministry of Disaster Management and Relief was created in 1983, with the Disaster Management Bureau (DMB) to coordinate all disaster management activity in the country. Disaster risk reduction and preparedness, and emergency response are conducted not only by the national government, but also at the district, Upazila (subdistrict), and Union Parishad levels. The regulative framework for disaster management includes:

- Disaster Management Act (2012)
- Bangladesh Climate Change Strategy and Action Plan (2009)
- National Adaptation Plan of Action (2009)
- National Plan for Disaster Management
- Standing Orders on Disaster (not always updated)
- Seventh Five Year Plan (2015 – 2020)
- Guidelines for government at all levels

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1   The official designation by the government of Bangladesh, which does not want to call them 'refugees'. Bangladesh has not signed the 1951 Refugee Convention.

This amounts to a comprehensive framework in terms of structures, legislation, procedures and planning. Coordination takes place among state actors at all levels, though not always with equal effectiveness. The governmental system in 2016 was observed to operate in a very centralised manner, while most NGOs work with a decentralised approach (Oxfam 2018:18). By 2018, decision-making remains very centralised, but needs assessments are already more decentralised to district level (idem:21). In recent years, the periodic updates of the Standing Orders on Disasters, which define the roles and responsibilities of state ministries and other relevant institutions, and of the army, have become a more consultative process, including national NGOs. This can further strengthen NGO/CSO-government collaboration (idem:21).

The framework for crisis-response in Bangladesh is that of natural disaster management, climate change, resilience building and reduction of vulnerability, which is directly identified as poverty. Poverty, resilience and economic development are core concerns, more than impartiality, neutrality or independence (Oxfam 2016:17). Refugees and undocumented migrants come under the Ministry of Foreign Affairs, leaving a gap in the humanitarian approach (idem:18). The government response to the Rohingya crisis is coordinated by a national task force chaired by the Ministry of Foreign Affairs and consisting of representatives of various ministries and UN agencies. Operations on the ground are coordinated by the Office of the Refugee, Relief and Repatriation Commissioner (RRRC) as dedicated lead. Created in 1992, to deal with earlier waves of Rohingya refugees, it scaled up to address the much larger refugee challenge that emerged in the autumn of 2017. The RRRC serves as a *"vital interlocutor role between the government policies and the sector's strategies"* (Joint Response Plan for Rohingya Humanitarian Crisis 2019:46). Connected to the RRRC is the Camp-in-Charge, which oversees coordination at the camp level, monitors overall services in the camps, and ensures that any gaps or duplicative efforts are addressed (Jayasinghe et al 2020:29 – 31). It is currently not clear how the RRRC would or could evolve at national level (Oxfam 2018a:21).

The Bangladesh Red Crescent is an auxiliary to the government and responds to natural disasters but also to the refugee crisis. For the Rohingya refugee response, donor national societies all chose to work with and through the Bangladesh Red Crescent, not setting up parallel operations.

Noteworthy are the disaster management capabilities of the Bangladesh army. Well trained and experienced in UN peace missions, this army also has significant disaster management capacities and its own Armed Forces Division in Disaster Management. The army demonstrated its effectiveness in the initial weeks of the rapid, large-scale influx of Rohingya/FDMN refugees, in the autumn of 2017, when it played a key role in managing this massive challenge. The recent consolidation of the national Disaster Response Exercise and Exchange simulation exercises, in which the army is strongly involved, opens new avenues for cross-sectoral collaboration (Oxfam 2018:22).

2.3   BANGLADESH CIVIL SOCIETY AND RELEVANT NETWORKS

Contemporary civil society organisations in Bangladesh started to emerge in large numbers after the creation of the country in 1971. Several thousand national/local CSOs working on development and disaster are registered with the government's NGO Affairs Bureau. Bangladeshi CSOs vary greatly in size, with BRAC among the largest NGOs in the world, now working in ten other countries as well.

'NGO' in the Bangladesh context is not identical to a 'civil society organisation' or CSO. An NGO has a narrower legal focus and brings the organisation under the regulatory oversight

of the NGO Affairs Bureau, which operates under the Foreign Donations Regulation Act (ICNL 2020:10). It is also possible to register as a voluntary welfare organisation with the Department of Social Services or, for women-focused organisations, with the Department of Women Affairs. Those operating a micro-finance programme, must register as a Micro-Finance Institution with the Microcredit Regulatory Authority (idem:10 – 11). Compared to other countries, Bangladesh's civil society has had much space to develop, but it is currently experiencing pressure from the political dynamics in the country, and from different views and interpretations on the role of religion in societal and political life.

Four major networks bring together Bangladesh's local and national NGOs or CSOs around disasters and humanitarian issues: The Cox's Bazar CSO and NGO Forum (CCNF), the National Alliance of Humanitarian Actors (NAHAB), the Network for Information Response and Preparedness Activities (NIRAPAD), and the Disaster Forum.

The CCNF includes about 40 local and national NGOs working on disaster management and economic development in Cox's Bazar district. As that is where the about one million Rohingya refugees are concentrated as per government policy, most also work on this refugee response. The major objectives of the CCNF are to ensure coordination among members and the government and to *"promote a human and gender responsive society"* (CCNF 2017). It has been an active platform for discussions on localisation.

The Disaster Forum consists of 70 humanitarian and development agencies, research institutions, government departments, and independent activists who work on various disaster and environmental issues, with a special focus on preparedness. Since 1994, the Forum has worked on issues related to the accountability of humanitarian and development agencies. Its activities consist mainly of producing publications, training, and communication materials. As a forum, it does not seem to be actively involved in the Rohingya response (Jayasinghe et al 2020:31 – 32).

NIRAPAD or the Network for Information, Response and Preparedness Activities on Disasters, established in 1997, is a humanitarian network of 22 NGOs. It generates and manages knowledge, provides technical support for disaster risk reduction and climate change adaptation, and promotes collaboration and partnership. NIRAPAD has addressed issues like establishing an accountable humanitarian system and mainstreaming cross-cutting issues like good governance, gender, and environment. It has documented the role played by local leadership in the Rohingya crisis response and has produced training guides on how to encourage women's leadership in disaster risk reduction (NARRI 2012). NIRAPAD collaborates with the Humanitarian Advisory Group's pro-localisation work in Asia and the Pacific.

Also relevant are the Bangladesh NGOs Network for Radio and Communication, which brings together the significant CSO experience with community-radio in multiple contexts, and Shongjog, a multi-stakeholder platform for communicating with communities, catalysed by the Communication with Disaster Affected Communities (CDAC) network. This platform includes the government, INGOs, UN agencies, the Bangladesh Red Crescent Society and Bangladeshi CSOs. In practice, very few Bangladeshi CSOs currently seem to have become a member.[2]

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2 http://www.shongjog.org.bd/about-the-members/ (accessed on 6 December 2020)

The wider **Bangladesh CSO NGO Coordination Process** is also noteworthy. It has a vision for an independent sustainable and accountable local CSO/NGO sector in Bangladesh – vibrant and proactive along with positive engagement and equal partnership with the state and private sector for humanitarianism and development. Part of its mission is *"to negotiate with the government, INGOs, UN agencies and donors to encourage them to take an appropriate and progressive facilitating role in view of Principles of Partnership, Grand Bargain and Charter 4 Change, and to establish primacy of the role of local CSO/NGOs and thereby local leadership."* This involves a close engagement with ADAB and the Federation of NGOs in Bangladesh. ADAB is a large organization coordinating the local and national CSOs who are engaged in development works in Bangladesh, which also provides strategic help to enhance the efficiency of its member organisations. Then there is the Federation of National NGOs, which was formed in 2002 – 2003 to bring small and large CSOs together and to define and protect their roles in constructive engagement with the government.

NAHAB was launched in 2017 by a Start Network project (Shifting the Power) in collaboration with the Government of Bangladesh. By mid-2020 it brought together 56 local and national NGOs (Kuperus et al. 2020:52). The platform serves for local and national NGOs to be more collaborative rather than competitive, to gain a stronger voice and better representation in humanitarian platforms, networks, and the national disaster management structure. NAHAB also facilitates access to financial and non-financial resources, helps to build disaster-resilient communities in Bangladesh and to respond quickly and effectively to smaller and larger disasters. In 2018 it became a member of the Humanitarian Coordination Task Team (HCTT) (idem:54).

Concern has been expressed about the international agency-driven creation of more networks. *"There is a real concern from local and national NGOs who are not more regularly connected to INGOs, that INGOs create more and more networks, which exclude many local and national actors, and compete against already existing networks. DEPP is not the only one creating 'networks': The consortium DeSHARI (Developing and Strengthening Humanitarian Assistance and Risk Reduction Initiatives) was also started by some Start member agencies, (Christian Aid working with Action Contre la Faim (ACF), DanChurchAid, Muslim Aid and Save the Children). It works in climate-vulnerable areas of Bangladesh. It works with 15 Bangladeshi CSOs in 27 of the most vulnerable districts of Bangladesh across the southern coastal region, north-west and central flood and chaor (wetland) areas"* (Patel 2017:32).

A Bangladesh Earthquake Society was formed in 2002 as a multi-disciplinary, national platform.

Bangladesh's national disaster management capabilities have much increased in recent decades. Natural disaster awareness and preparedness are included in the national educational curricula from primary to undergraduate level. Some 15 universities offer advanced studies and research capacities on disaster management. In 2016, it was recommended to develop these into a fuller 'humanitarian curriculum' (Oxfam 2016:21). By 2018, following the Rohingya crisis, Refugee Law and Migration Law were included (Oxfam 2018:10). One strategic weakness, according to one interviewee, remain urban disasters (fire, earthquake, pandemic, industrial accident). Working in and on conflict situations might be another one (idem:60).

2.4   INTERNATIONAL AID AGENCIES

Most of the important humanitarian donors are present in Bangladesh (ECHO, USAID, JICA, the UK, Swiss, Germany, Netherlands, Canada and other bilaterals), as well as most UN agencies. Prior to the autumn of 2017, UNHCR had a small presence only, with responsibility for a few formal camps of previous Rohingya refugees in Cox's Bazar district. IOM on the other hand, had a significant presence in Bangladesh, including in Cox's Bazar district, related mostly to the importance of migrant labour for the country. OCHA on the other hand did not have a presence in mid-2017 and continues not to have one. Instead, the UN-led coordination is split over three main entities: A Humanitarian Coordination Task Team (HCTT) that now deals with all humanitarian situations except the Rohingya in Cox's Bazar. The latter comes under the coordination umbrellas of an Intersectoral Coordination Group (ISCG) in Cox's Bazar itself, and a Strategic Executive Group in Dhaka, co-chaired by the Resident Coordinator, IOM and UNHCR. Given that the UN received almost two thirds of the Rohingya response funding, this multiplication of coordination platforms is noteworthy. In recent years, in Bangladesh, the UN has struggled to work as one (Oxfam 2018:9 – 10).

Currently, there are INGO forums in Dhaka and in Cox's Bazar. Prior to the 2017 Rohingya crisis, some 30+ INGOs were present in Bangladesh, often for decades, and with strong poverty reduction and development programmes. Within a short time, the Rohingya situation led to their numbers at least tripling (idem:6). There is also the INGO National Alliance for Risk Reduction and Response Initiatives (NARRI), which, however, is currently less active than it used to be.

2.5   THE PRIVATE SECTOR

Bangladesh has been showing continuous economic growth. The government's policies lean more towards private-sector- rather than aid-driven development and poverty reduction. There is a private sector potential to contribute to disaster management and emergency response, mostly through the provision of expertise, in-kind donations but also services. For many years already, corporations and business owners have been giving warm clothes and food to people affected by cold waves in the north of the country. They have also provided food and construction materials such as roofing sheets, to people affected by cyclones. Contributions come through the Prime Minister's office or more directly. Some businesses occasionally sponsor humanitarian actions by NGOs.

2.6   LOCALISATION-INTERNATIONALISATION-RELOCALISATION DYNAMICS

As mentioned, in the author's perspective, a localisation of crisis management needs to be understood in relation to prior internationalisation. From a Bangladeshi perspective, major progress had been made in the past 40 years to manage crises with their own capacities, reflecting a steady process of localisation prior to the 2017 Rohingya/FDMN crisis. Bangladeshi CSOs were present at the World Humanitarian Summit, and based on extensive prior consultation among each other, lobbied international actors to recognize the roles and contributions of national and local actors.

However, the autumn 2017 response to the very fast influx of some 700,000 Rohingya refugees in Cox's Bazar was conceived and executed as a typical 'comprehensive' response (Ramalingam & Mitchell 2014). This constituted a major internationalisation and reversed significant localisation gains in Bangladesh. Different Bangladeshi CSO members concur in this view:

> **"The Rohingya situation set back localisation in Bangladesh for about ten years."**
>
> **"The whole thing has come to a head with the Rohingya crisis. The INGOs were on the backfoot in Bangladesh. They were not able to compete with strong national organisations, and they were losing out. The Rohingya crisis saved the INGOs in Bangladesh. They received massive funding. International donors trusted them more than they trusted Bangladeshi organisations. A disproportionate amount of funds went to international organisations. Everyone is responsible for this, but a major reflection is required by our government of Bangladesh. They did nothing to monitor this."**
>
> **"For a very long time now, international agencies have been promising to 'build on local capacities'. But they are a bit like smokers: They were addicted to smoking, tried to quit, but then started again."**
>
> (Different Bangladeshi CSO representatives)

National governments play a critical role in shaping the dynamics of internationalisation and localisation. It is fair to say that the Government of Bangladesh wants the Rohingya situation internationalised for two reasons: Politically, it does not want the by now one million Rohingya to stay in Bangladesh, as the country cannot absorb them. The strategic objective therefore is their return to Myanmar, which will require international engagement, even pressure, on the Myanmar Government. In line with that general objective of voluntary repatriation, the government sets clear boundaries as to what type of assistance international relief agencies may provide (avoiding a structural shift towards semi-permanence) and what kind of public advocacy they may engage in. Also economically, Bangladesh cannot be expected to bear the costs of providing services and protection to the refugees alone, international financial solidarity is needed.

The result is a dualistic situation regarding internationalisation and localisation: One dynamic plays out around the Rohingya situation in Cox's Bazar district, the other in the rest of the country. This report will treat them successively, starting with the latter.
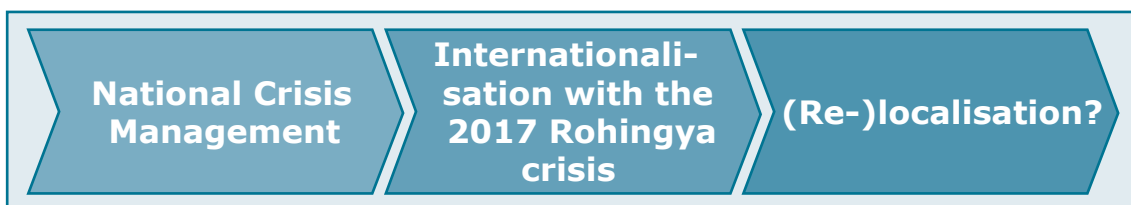

Figure 1.   Localisation dynamics in Bangladesh

3 LOCALISATION INITIATIVES AND CONVER-SATION SPACES

3.1 RELEVANT RESEARCH

At least five earlier research studies remain highly relevant. Oxfam in Bangladesh commissioned two consecutive research pieces to assess the collective humanitarian capacities in the country, using a methodology developed by Fernando Almansa (Oxfam 2016; 2018).[3] There is insufficient appreciation of their value in looking at the collective humanitarian capacities or national 'humanitarian infrastructure'. Oxfam also commissioned a study on humanitarian financing for Bangladeshi actors (Oxfam International 2018). In January 2017, GMI took a first look at the Start Network's localisation practices in Bangladesh, as part of a wider baseline study on localisation of the global Start Fund (Patel 2017). In 2019, and the Australia-based Humanitarian Advisory Group (HAG), conducted an assessment on the degree or quality of localisation in the response to flooding in the northeast of the country (HAG & NIRAPAD 2020). Key findings and insights will be mentioned in different sections of this report.

3.2 RELEVANT INITIATIVES

Key actual or potential localisation-relevant initiatives[4] come from the Start Network in Bangladesh, the Empowering Local and National Humanitarian Actors (ELHNA) project of Oxfam in Bangladesh, the National Alliance of Humanitarian Actors in Bangladesh or NAHAB platform, and the Charter for Change (C4C) signatories.

3.2.1 START NETWORK IN BANGLADESH

The two most directly relevant actions are the Shifting the Power project and the ongoing development of Start Fund Bangladesh, now becoming a 'national hub'. Both have gained stronger momentum since 2017.

SHIFTING THE POWER

Shifting the Power in Bangladesh was a five-country project by a consortium of INGOs, notably Action Aid, CAFOD, Christian Aid, Tearfund, Oxfam and Concern Worldwide. Implemented between 2016 – 2018, it is now formally concluded. It had three aims:

- Strengthening the capacities of participating national/local CSOs to deliver humanitarian preparedness and response. The humanitarian capacity self-assessment and capacity strengthening plans were completed by each partner organisation using the 'Strategic Humanitarian Assessment and Participatory Empowerment' (SHAPE) framework. The project had developed this framework based on a model of humanitarian capacity that emphasises the importance of power in the humanitarian system and recognises organisational capabilities to not only deliver humanitarian response but also to control and influence the shape of that response.

- Supporting local actors so they are better represented and heard in their relevant platforms and networks. Each country took a different approach in achieving this and by doing so, ensured maximum relevance to their specific contexts.

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3 Two similar, successive, comprehensive assessments of capacities were also conducted for Somalia.
4 Excluding the Rohingya/FDMN situation

- Recognising the crucial role INGOs themselves play within the current power imbalance, and therefore work with the consortium member INGOs to identify and respond to local/national organisations capacity, leadership & voice.

Bangladeshi CSOs participating in Shifting the Power

- AKK – Amra Kaj Kory Avas
- Association for Voluntary Actions for Society
- DAM – Dhaka Ahsania Mission
- Caritas Bangladesh
- Sajida Foundation
- UDPS – Utara Development Program Society
- GUK – Gana Unnayan Kendra
- CCDB – Christian Commission for Development in Bangladesh
- DSK – Dushtha Shasthya Kendra
- Shushilan
- WCB – World Concern Bangladesh

Box 2. Bangladeshi CSOs in Shifting the Power

In Bangladesh, 11 Bangladeshi CSOs took part, several if not all existing partners of INGO consortium members. Issues such as barriers to greater local humanitarian leadership, the role of local actors in decision-making forums, and the role of women in disaster response emerged already in the early meetings. Participating Bangladeshi CSOs also suggested the formation of a national NGO platform, which materialised as NAHAB (National Alliance of Humanitarian Actors in Bangladesh) in early 2017.

Critical observations by the Bangladeshi CSO participants, in the early stages of STP, were that INGOs for example do not provide compensation to a national/local CSO when they hire away an experienced and capable staff member (one of the C4C signatories' commitments). They also noted that the financial procedures of INGOs are very slow and create cash flow problems for Bangladeshi organisations and that INGOs do not enable meaningful contact between Bangladeshi CSOs and donors. They might briefly meet during a 'field' visit by a donor representative, but these are short term contacts ("*gone with the wind*"), which do not really establish a meaningful relationship. The INGOs had concerns too:

"*If the intention is to put the local and national organisation in the driving seat, then, as international partners, INGOs at one stage will have to take a back-seat role. Having played first fiddle, is it possible to play second fiddle? is a million-dollar question*" (Grant Thornton 2016:9 – 10). Although the global name for the project started out as 'shifting the power', the language later changed more towards 'sharing the power'.

STP managed to obtain Core Humanitarian Standard (CHS) alliance membership for five of the eleven Bangladeshi CSOs. Partners in nine districts received training on Joint Needs Assessments (JNAs). By participating in JNAs, national organisations reportedly felt they had greater exposure to international decision-makers and coordination spaces. Members were involved in leading a Joint Needs Assessment in one of four districts during floods in April 2017 (INGOs led the other three). Following the JNA, four partners formed a consortium that received funding for joint humanitarian activities from the Empowering Local and National Actors (ELNHA) project (Tanner 2017:8 – 9).

3   START FUND AND START HUB BANGLADESH

The Start Fund is managed by the Start Network, a consortium of a significant number of NGOs, most but not all of them international. The Start Network stated its commitment to localisation already in 2016: *"Today some 50% of Start Fund grants are implemented by national NGOs acting as subcontractors to Start Network members. While this partnership between national and international NGOs provides considerable value and resilience to the system, we will go further, and ensure that 25% of Start Fund grants by 2020 will be directly be implemented by national Start Network member NGOs— without the need for subcontracting"* (Start Network statement to the World Humanitarian Summit 2016 and see also Patel et al. 2017).

By early 2017, twenty members of the Start Network had a presence in Bangladesh, several for decades already. Most worked on development and poverty reduction programmes and only in more recent years became involved in disaster risk reduction responses. Some have huge offices in Dhaka and field presence at District, Upazila and Union level, with over 1,000 staff. The members have different operational modalities. Some always implement themselves, some only work through and with Bangladeshi CSOs, others do both.

Patel, reviewing the situation in January 2017 noted some of the drivers of change: *"The national focal point of INGOs explained that it came at a time when some INGO members were experiencing funding problems. Donors were partially shifting from aid to trade mode, and Brexit then affected the value of the Pound Sterling and raised concerns about future access to funding from the European Civil Protection and Humanitarian Aid Operations (ECHO). 'Shifting the Power' was perceived as a radical shift from INGOs to local organisations, with the latter taking the lead and INGOs becoming irrelevant"* (Patel 2017:14). Accelerating localisation because of a reduced income for international agencies is what GMI calls a 'localisation by default'. We will return to this issue later.

The purpose of the Start Fund is to provide super-fast financing for rapid emergency responses. The funding is for a limited duration however, as it is intended to fill the gap before other, slower, funding becomes available, and on a larger scale. Direct funding is only available for Start Network members, which must have passed a thorough due diligence process. The concept of a decentralised country-fund, managed directly by Start Network members in Bangladesh, started to take shape in 2016, and led to DFID providing a grant of £ 10 million. Two steps were planned make the Bangladesh Start Fund operational:

- The Start Fund Network increasingly hands over governance responsibilities to Start Fund Bangladesh (once local actors have internalised the principles and procedures of Start global). Start Fund Bangladesh is now becoming one of the Start Hubs with the authority to manage its own funds and associated learning.

- The expansion of accessibility of the fund to a first cohort of non-member organisations and more national organisations.

In early 2017, Bangladeshi CSOs were concerned about their ability to compete with INGOs, for example in rapidly putting together quality proposals – in English. The idea emerged that part of the Start Fund Bangladesh would be reserved for Bangladeshi CSOs only. Three years later, there have been significant developments:

- Of the now 47 NGO members of Start Fund Bangladesh, 27 are Bangladeshi ones. Most are long-time partners of the INGO members. All members are equal regarding decision-making and eligibility for Start Fund funding. The upper ceiling of £ 300.000 for rapid emergency response applies to all.

- The first disbursement from Start Fund Bangladesh to a national NGO occurred in June 2019. During the COVID-19 pandemic in 2020, the Bangladeshi CSO members received around 80% of the Start Fund Bangladesh's grants. In a reversal from the past, consortium proposals now included set-ups with a Bangladeshi CSO as consortium lead.

- The decentralised fund management and decision-making have significantly reduced the average response time to deliver Start Fund relief to affected communities, from 38 days to 19. Speed is important, as it can determine whether affected people sell their assets or not. If timeliness is a criterion for value-for-money, then this has improved.

- Action against Hunger continues to host the Start Fund Bangladesh.

While these developments definitely mean progress towards localisation goals, attention to mindsets and behaviours remains necessary. Consortia led by national or local actors can fall into the same traps as those led by international actors: They are put together opportunistically rather than genuine appreciation for purpose-oriented complementarities, and the consortium lead may behave in a domineering manner towards consortium members. They might, for example, impose their organisational policies or take the right to visit the operational sites of consortium members without prior notice.

The Start Network's mid-term strategy is to further decentralise, first by creating 'Hubs' in different locations. The medium-term vision is for Start Network to evolve from a global platform to a distributed network of national and regional hubs, that will shift power, decisions, resources, and collective action closer to crises. Hubs are emerging in India, Pakistan, Guatemala, Democratic Republic of Congo and in the Pacific.[5] Given their existence since 2016, members in Bangladesh want to follow their own developmental trajectory. One vision is to broaden the membership and collaboration beyond NGOs/CSOs. Academic institutions, private sector actors, community leaders, a local market committee etc. might become part of the now multi-sectoral Hub in Bangladesh, as they all have roles to play and contributions to make.

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5 https://startnetwork.org/hubs (accessed on 22 November 2020)

3

3.2.2 EMPOWERING LOCAL AND NATIONAL HUMANITARIAN ACTORS (ELNHA)

The Empowering Local and National Humanitarian Actors (ELNHA) project initially started as a three-year project (2016 – 2018), implemented in Bangladesh and Uganda by Oxfam Novib and Oxfam Great Britain, funded by the Ikea Foundation. Its current second phase ends in March 2021. ELNHA promotes a more equal sharing of power and resources between international humanitarian actors and local and national ones. Empowering local and national humanitarian actors (LNHAs) to lead their own emergency preparedness and -responses is assumed to have a positive influence on vulnerable people living in disaster prone areas, as they will benefit from well-coordinated humanitarian responses (Lewinsky et al 2019:1). Conceptualised already before the World Humanitarian Summit, it appears an excellent example of what localisation can mean in practice.

To remain manageable during its initial phase, the ELNHA facility in Bangladesh concentrated on nine disaster-prone districts: Kurigram, Gaibandha, Sirajgonj, Dhaka, Sunamgonj, Kishorgonj, Satkhira, Borguna and Patuakhali. The second phase now covers only four districts and the agencies in them. It is worth emphasizing that the ELHNA project team sits with a Bangladeshi partner, not at Oxfam in Bangladesh.

"ELNHA is based on a Theory of Change which contains three complementary strategies. STRENGTH concerns organisational capacity development of LNHAs to design, lead and deliver humanitarian responses. VOICE relates to influencing the national humanitarian agenda through coordination, networking and advocacy by LNHAs. The third strategy, SPACE, is concerned with influencing national governments and international actors who form part of the international humanitarian architecture in order to create a more enabling environment for local actors to lead emergency preparedness and responses in their own context." (Lewinsky et al 2019:iv).

A creative aspect of ELNHA lies in its combined offer of support for organisational capacity-development (Humanitarian Capacity Development Fund) and access to emergency response funding (Humanitarian Response Grant Facility). This significantly improves the otherwise common set up in which national/local organisations receive 'capacity-support' but cannot access funding subsequently. They then cannot apply and test out their new learning in practice and may not even be able to retain their newly-trained staff.

In 2018, ELNHA enabled the creation of a local Humanitarian Actor/Alliance Platform in Kurigram. It initially brought together seven, currently eight local NGOs and CBOs of various sizes, two of which are women-led. Interviews with several members indicate that the sustained training and learning received through the ELNHA project has been effective. Their training focused on technical aspects such as communicating with communities, contingency planning and proposal writing, but also on organisational aspects such as vision, mission and policies. This was not an easy task for the CBOs who have only a small number of staff and few resources. And the challenge to retain newly won capacities remains: irregular financing means that a certain percentage of any staff can only be contracted as 'project staff', which they must let go when a project ends. Members of the platform met with the 2018 Grand Bargain mission to Bangladesh. As a collective, they want to bring in other district-level actors, also from the public and private sector. This then is an example of stronger collaborative capacities among geographically 'local' Bangladeshi actors.

Notwithstanding the positive impacts of ELHNA, a strategically reflective view acknowledged its limitations:

> *"Localisation as a project is not enough. You need a different level of commitment to mainstream this throughout the country. ELNHA remained a project. It should have been rolled out institutionally."*
> (Senior staff INGO)

3.2.3 NAHAB – NATIONAL ALLIANCE OF HUMANITARIAN ACTORS

NAHAB is an outcome of the Shifting the Power project. NAHAB has consciously decided not to manage funds in order to avoid mistrust and unhealthy competition among members of its network (Lewinsky et al 2019:vi). NAHAB's perspective on localisation starts with the 'local' actors in the geographical sense of the word, i.e. the community-, governmental- and non-governmental entities in the districts. This leads to a process of district level hazard mapping, planning and collective coordination and capacity sharing for fast and effective responses. The district level capacities are then connected to and assisted by a national level architecture with additional capacities. So far, the focus remains on Bangladeshi agencies. The approach is being developed in the districts of Sunamgonj, Sirajgonj, Barguna, Khagrachari, Jamalpur, Satkhira, Kurigram and Dhaka South City Corporation. Each will do its own, contextually appropriate, localisation road map (NAHAB no date). Though not stated explicitly, NAHAB implicitly seems to assert the primacy of these 'local' actors (Ehsanur Rahman in NAHAB 2019:51 – 54). Other Bangladeshi interviewees also emphasised the importance of the socio-geographical roots when reflecting on localisation: a local actor and its leadership come from a certain area and therefore feel a deep connection and responsibility towards others in that area. In Bangladesh, as in other countries, the localisation conversation can also focus on the dynamics between 'local' actors in that sense, and Bangladeshi organisations coming from 'elsewhere' in the country.

3.2.4 CHARTER FOR CHANGE

The Charter for Change (C4C) is an initiative by some INGOs to be more supportive of national and local actors. The Charter spells out eight concrete commitments. It is an obligation only for the signatory INGOs. National and local CSOs that look favourably on the charter can become 'endorsers'. This authorises them to inquire from the signatory INGOs how they are advancing, and work with them to turn the commitment into practice. The current list of endorsing Bangladeshi CSOs is provided in box 3.

NAHAB sees a role for itself in mainstreaming the C4C agenda in the country strategies of signatory INGOs, and in the periodic plans of endorsers (Ehsanur Rahman in NAHAB 2019:47). For now, however, signatories in Bangladesh have not come together with the endorsers, to reflect on where they are in turning these commitments into practice – and whether that practice is institutionalised or remains dependent on individuals. One senior staff of a signatory INGO felt that, so far, *"progress comes more from individual than institutional leadership. This needs to be more fully institutionalised."*

- Ashroy Foundation
- Association for Rural Poor
- Association of Voluntary Actions for Society (AVAS)
- Bangladesh NGOs Network for Radio and Communication
- Barokupot Ganochetona Foundation
- Caritas Bangladesh
- Coastal Association for Social Transformation Trust
- Cox's Bazar Environment, Human Rights & Development Forum (CEHRDF)
- Dhaka Ahsania Mission
- Garib Unnayan Sangstha (GUS)
- ISDE-Bangladesh
- JAGO NARI (Barguna Nari Jagaron Karmoshuchi)
- MONISHA (A Social & Human Development Organisation)
- Participatory Research Action Network (PRAN)
- Programme for Helpless and Lagged Societies (PHALS)
- Sangathita Gramunnyan Karmasuchi/Organized Village Development Program (SANGRAM)
- Young Power in Social Action (YPSA)

Box 3. Bangladeshi C4C endorsing organisations, 2020

Such joint country level reflections are now encouraged by the global C4C coordination committee.

C4C signatories and endorsers could come together to set out a joint plan for advancing localisation in line with the C4C commitments, say for the next two or three years. This inquiry suggests that not all Bangladeshi endorsers are confident enough yet, to hold C4C signatories accountable regarding the implementation of their commitments. Power inequalities continue to lead to self-censorship at times.

Several C4C signatories are also members of the Start Fund/Hub Bangladesh, support NAHAB or are connected to NIRAPAD. This provides an opportunity for more collective and strategic advancement of more equitable relations between international and national humanitarian actors, and a better sharing of power and resources.

3.3   LOCALISATION CONVERSATIONS

3.3.1   BANGLADESHI CIVIL SOCIETY PRE-AND POST-WORLD HUMANITARIAN SUMMIT

Bangladeshi CSOs did not engage with the localisation commitments after the Grand Bargain. They were represented at the World Humanitarian Summit itself, with a widely consulted policy and advocacy paper, demanding for such.

In October 2017, more than 35 Bangladeshi CSOs issued a call for an *'Equitable Partnership for Sovereign and Accountable Civil Society Growth'* (Bangladeshi CSO grouping 2017). Their 18-point 'manifesto' mostly articulates their expectations and demands from international actors. The signatory agencies project themselves – and demand to be seen and treated – as 'civil society' actors. The manifesto shows an understanding of international policy debates and commitments, not only of the Grand Bargain but also those on 'aid' or 'development effectiveness', that many international relief workers are not familiar with.[6]

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6   A national ownership and international partnership agenda elaborated in the development sector through high-level meetings between 2003 (Rome) and 2011 (Busan).

It asserts the importance of developing Bangladesh's civil society as third sector for democracy, gendered equality and human rights. From this perspective, localisation is only a component of a larger and strategic vision. The demand to be treated as 'civil society' organisations is not a legal technicality. It carries connotations of voluntary organisations who do not just implement projects but play broader roles and take on wider responsibilities in their society, notably in the promotion and defence of civic rights. Instrumentalising these types of CSOs has a wider impact on societal dynamics than instrumentalising purely service-delivery oriented 'NGOs'.

Relevantly, the last point of the 'Equitable Partnership' manifesto, states that *"we, national and local NGOs, need to stand on our own feet with an accountable, inclusive and knowledge-based approach"* (Start Network and GMI 2018:10). The plan at the time was to complement the expectations and demands from international agencies with a statement on the accountability of Bangladeshi CSOs. Due to the massive workload around the refugee crisis, the 'Accountability Charter of the Local CSO-NGO of Bangladesh' was not published until August 2019 (COAST Trust 2019 /Bangladeshi CSO/NGO Grouping no date).

Bangladeshi CSOs were also active at the Asia-Pacific Regional Conference on Localisation, one of the regional conferences initiated by the Grand Bargain Workstream on Localisation, in Jakarta in August 2019.

3.3.2 THE LOCALISATION TECHNICAL WORKING GROUP OF THE HCTT

The Humanitarian Coordination Task Team (HCTT), established in 2012, is co-chaired by the Director of the Dpt. of Disaster Management and the UN. With a mandate to coordinate the roles of national and international actors, it is one strategic platform that provides space to discuss and implement localisation. In 2016, the HCTT decided to expand the representation of Bangladeshi CSOs among its membership (from one representative to three representatives and three alternates). The Dpt. of Disaster Management helped to organise a meeting in 2017 with CSO networks and CSO representatives, which led to the nomination of three representatives (NAHAB, COAST Trust and the Bangladesh Disaster Preparedness Centre) and three alternates.

Further momentum was thwarted in late 2017 and 2018, when Bangladesh had to cope with many natural disasters (cyclone, floods and landslides) and the influx of an additional 700,000 FDMN/Rohingya. However, the HCTT saw the 2019 response to the regular flooding in NE Bangladesh as an opportunity to examine the interaction between international and national/local relief actors.

NIRAPAD, supported by the Humanitarian Advisory Group (HAG), conducted a Localisation Baseline Assessment for the 2019 Monsoon Floods, which was published in April 2020 (HAG & NIRAPAD 2020). HAG's adaptation of the GMI 'seven dimensions' framework was used.[7] Box no. 4 summarises the main findings. While the report does not discuss the dynamics between 'local' actors in the flood-affected areas and 'national' ones, it does contain a rich set of recommendations (idem:9–10).

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7   HAG added 'leadership' to GMI's original framework and dropped the dimension of 'visibility'.

One recommendation revolves around carrying out a comparable localisation review for each disaster response in Bangladesh that has received international support; another suggests establishing a 'localisation working group' within the Humanitarian Coordination Task Team (HCTT) that will oversee these reviews and monitor overall progress. Such a Localisation Technical Working Group (LTWG) was then created in July 2020. Comparable emerging localisation/partnership working groups in other countries so far do not have the necessary resources and are therefore unable to dedicate time to this kind of work. For the LTWG working group in Bangladesh, seed funding reportedly was provided by the UK, Start Hub Bangladesh, Oxfam and the Resident Coordinator's Office (UN RCO).

Reportedly, the recommendations from the HAG & NIRAPAD report are gradually being implemented. For both Cyclone Amphan and the 2020 Monsoon Floods Response, clusters incorporated several localisation indicators in their planning and reporting, so that progress can be monitored. Relevant financial information is being tracked.

Meanwhile the LTWG, which operates both in Bangla and English, has developed its work-plan for 2020 – 2021, which is publicly accessible.[8] An important process was the selection of a Chair, which had to be from a national/local CSO that is a formal endorser of the Charter for Change. The result was the election of an individual from Caritas Bangladesh for an initial mandate of one year.[9] In November 2020, the LTWG, together with the UN RCO, organized a lessons learnt exercise on the response to Cyclone Amphan, which facilitated the interaction between local/national NGOs and the international humanitarian community.

This Working Group meets regularly and will be the central entity to monitor and report on progress on the Localisation Agenda. Some donors have signalled that they are open to discussing their localisation-related funding with the Working Group first. With the support of the ICVA, the LTWG has established a connection with the localisation sub-group of the Interagency Standing Committee (IASC), co-chaired by UNHCR and the Somalia NGO Consortium.

3.4   COMMON UNDERSTANDING, SHARED COMMITMENT?

Multiple dimensions: The above-mentioned reference framework includes several dimensions of localisation. One has to keep this in mind as there are still many all over the world who only remember the 25% target in the localisation commitment of the Grand Bargain, and believe this process is mostly about funding. Although a significant number of Bangladeshi CSO leaders are aware of the Grand Bargain and the C4C, and interpret their broader purpose and intent correctly, including the underlying issues of power, this inquiry also revealed that some Bangladeshi CSO representatives focus very much on the funding aspect. Since access to quality funding and finance is a critical issue of course, this focus is quite understandable. Several Bangladeshi CSOs have received direct funding over the years, but perhaps more for developmental and human rights work than for localisation processes. The 2007 Principles of Partnership, also voluntarily articulated by international relief actors, are less widely known.

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8   https://www.humanitarianresponse.info/ru/operations/bangladesh/localisation-technical-working-group
9   https://www.humanitarianresponse.info/en/operations/bangladesh/document/chair-selection-process-and-relevant-documentsltwg-bangladesh

A longer-term strategic perspective: The GMI-inspired framework that HAG and NIRAPAD have introduced, takes a broader perspective, exploring issues beyond funding only, which is refreshing. However, it is useful to complement their framework with a more strategic outlook, as per GMI's four quadrants diagram. The Grand Bargain and C4C fall short when it comes to a clear longer-term vision and what success would look like. For GMI, this includes significant, collective, national and local capacities to handle a variety of challenges with humanitarian consequences competently. International financial and technical support should be provided where necessary, but without taking over, except where fundamental rights would not otherwise be protected. Making this the main goal should lead to a strategy of 'localisation by design'. This is also where the HUCOCA (Humanitarian Country Capacity Analysis) framework can make a contribution.

Commitment: For a sizeable number of Bangladeshi CSOs the Grand Bargain is a live policy- and practice reference, with commitments that international relief donors and all major international relief agencies have voluntarily entered into. The CSOs therefore feel justified in referring to them, demanding that they are implemented, and asking for updates and accountability. Unfortunately, as this inquiry (the situation is similar in many other countries) shows, these commitments are not necessarily institutionalised among donors, UN agencies and INGOs. It can happen that personal views and inclinations of key individuals of these agencies, at country level, prevail. Some even give the impression of completely rejecting a commitment that their agency has formally accepted. Based on this experience, Bangladeshi CSOs object to localisation being framed as merely a 'technical' issue. They see it more as being about the control over resources and about power, which makes it a political issue.

Definitions: The Localisation Technical Working Group had some discussions about the definition of who is a 'national/local actor', which not everyone found helpful. They distract from the purpose of the Grand Bargain and also create tensions between organisations that should complement each other. *"There is too much talk about definition instead of working in the spirit of localisation"*, in the view of one interviewee. Another interviewee observed that definitions debates can even sharpen antagonisms: *"We start the discussion with a divide, while we really should be looking at capacity-convergence or capacity-sharing based on complementarities. The issue is not whether international agencies should work themselves entirely out of a job in Bangladesh, but whether they will work themselves out of certain roles."* There are some sensitivities however, about Bangladeshi organisations that are part of international alliances, federations or families, and particularly about INGOs turning into Bangladeshi organisations, fully staffed with Bangladeshi nationals and Bangladeshi board members. From the perspective of 'home-grown' Bangladeshi organisations with no formal integration into international federations or the like, this gives the 'post INGOs' a competitive advantage in terms of access to international funding and expertise. A separate legal identity also does not mean they are not influenced by international decision-makers. A particular point of tension arises when such nationalised INGOs or Bangladeshi agencies embedded in an international federation, start engaging in substantial domestic fundraising from the general public, the private sector and other sources. They then enter into direct competition with 'home-grown' Bangladeshi CSOs for whom these in-country sources present a strategic opportunity to reduce their dependence on foreign aid. This is already happening in Bangladesh: *"We begin to see international agencies starting domestic fundraising in Bangladesh."* What this trend may lead to can clearly be seen in India, where nationalised INGOs have taken front stage. It is a global trend in several aid-recipient countries that are doing well economically – a trend that is becoming more widely contested (see Open Letter 2020).

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Decentralisation and/or transformation: There is a certain ambiguity between an understanding of localisation as a transformation in the structural inequality between international and Bangladeshi relief actors, and as decentralisation. It is an issue that also the Start Network has been struggling with, as identified in early 2017: *"The Start Network acknowledges that there is a problem. Four concepts appear repeatedly in its communications relating to the vision of a better state of affairs: decentralisation, diversity, subsidiarity and a more balanced humanitarian economy. But we have not found clarity around two key questions: 1. Why is the 'humanitarian economy' unbalanced in the first place? 2. What, in practice, will a more 'diverse' and 'balanced humanitarian economy' look like?"* (Patel 2017:12). The question remains whether Start Network's vision that involved 'disintermediation' has shifted to one of 'decentralisation'. *"We believe that a more balanced international aid system, which shifts power to those closest to the front-line, will generate more effective and appropriate responses for people affected by crises."* [10] The issue is not specific to the Start Network.

As mentioned before, an apparent localisation trend in Bangladesh sees the strengthening of multiple-actor complementary capacities at district level as the way to go. Multi-actor means not only local authorities and local NGOs and CBOs, but also other types of associations, including the private sector. This can lead to *"one district, one situation report"* [11] and district-level pooled funds.

Two challenges that remain are that the district- and sub-district administrations often do not have enough resources, and that there is a mandatory rotation of civil servants, except on very local Union levels.[12] The lack of readily available resources delays the speed of the emergency responses. The rotation leads to local civil servants perhaps not being familiar with their contexts and/or they might not have expertise on disaster preparedness and -response. Another question is how international agencies (and national Bangladeshi NGOs) will position themselves within such frameworks, and to what degree they are willing to share power and resources. The local actors interviewed for this inquiry were clear about wanting to be in the driving seat. One Bangladeshi source, whose work covers the entire spectrum from the national/international conversations to the local ones, pointed out that the *"the international agencies see themselves trying to sort out the problems of the local ones, whereas local organisations find that international agencies show ignorant and dominant attitudes."*

UN agencies in the picture: One cannot focus the conversation about localisation in Bangladesh largely or entirely on NGOs and CSOs. UN agencies receive the bulk of humanitarian funding. Bangladeshi CSOs have pointed out that many UN agencies have become increasingly operational in recent years, running all sorts of programmes and projects themselves. This distracts from the UN's core mandate to protect human rights and uphold international norms and laws. On occasion of the 75th anniversary of the UN, in early October 2020, the BDCSO organised a tele-conference to discuss the core mandate (human rights), funding structure, and appropriate roles for the UN. They pointed out that UN agencies are straying too far from their core role, taking on tasks that can and should be covered by Bangladeshi actors. Although well-attended by Bangladeshi actors, the UN was largely absent from this tele-conference. Participants were confident about their rights, as Bangladeshi and global citizens, to be part of the conversation about the reform and appropriate roles of the UN, and to question and debate to what degree the UN is living up to its core mandate.

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10 https://www.humanitarianresponse.info/en/operations/bangladesh/document/chair-selection-process-and-relevant-documentsltwg-bangladesh
11 Which would be in line with Grand Bargain commitment 5 to improve joint needs assessments.
12 The same challenges appear in Indonesia, with its explicit decentralisation strategy for disaster management.

Measuring the state of localisation in the 2019 flood response in northeast Bangladesh (HAG & NIRAPAD)

HAG & NIRAPAD assessed the degree and quality of localisation in the response to the 2019 monsoon floods. Its summary conclusion is as follows:

"Progress on the localisation of humanitarian action was evident in several areas in the flood response, including in supporting national and local leadership, coordination and complementarity, some partnership areas, and some funding areas. The study found evidence that the localisation agenda, including evidence and practices from other responses in Bangladesh, influenced the flood response in multiple ways. These were a strengthened national leadership role, more reliance on local and national networks, increased consultation with local organisations prior to an international response and a better understanding of the added value and complementary roles of international actors. There continue to be key challenges in supporting localised partnerships, including addressing power inequalities, enlarging the role for local and national civil society, funding opportunities, appropriate capacity support and community participation in the response."

The summary evidence on the key indicators is:

Leadership/decision-making

1. *Some to strong evidence* that local and national actors lead responses and dominate decision making

2. *Some to strong evidence* that international actors support and strengthen national leadership

3. *Some evidence* that international actors work with and respect in-country leadership structures and mechanisms

Coordination and complementarity

1. *Some to strong evidence* of national representation and engagement in coordination forums and meetings

2. *Some evidence* of clearly defined parameters for international actors complementing local and national actors in humanitarian response

3. *Some evidence* that humanitarian response is delivered in a way that is collaborative and complementary (i.e. based on an analysis of the specific strengths/weaknesses of different humanitarian actors)

4. *Limited evidence* that national civil society coordination mechanisms are funded and have technical capacity to operate in humanitarian response

Quality of partnership

1. *Limited–some evidence* that partnerships are based on equitable and ethical partnership practices

2. *Limited evidence* of longer-term strategic partnerships that aim to build systems and processes that mirror the ambition and goals of the local/national partner

3. *Limited evidence* of increased power and decision-making of local and national actors within partnerships

Funding

1. *Limited–some evidence* that local/national actors have access to direct funding with few or no barriers

2. *Limited evidence* of increased humanitarian funding to local and national actors

3. *Limited evidence* that local and national actors have increased decision-making power over financial matters

Capacity

1. **Limited–some evidence** of national and regional surge capacity and use of local/national over international expertise

2. **Some evidence** that international actors do not undermine the capacity of national actors in emergency response

3. **Some evidence** that contextualised humanitarian standards, tools and policies are available

4. **Some evidence** that legislation and plans are in place to support national response capacity

Policy-influence and advocacy

1. **Limited evidence** that policies are informed by local and national voices, including communities

2. **Some evidence** that national actors are recognised as key stakeholders in discussions regarding policies and standards that may have significant impact on them

3. **Limited evidence** that local and national actors can influence donor priorities in country, including programme design and implementation

Meaningful participation

1. **Limited evidence** of a development of community/contextualised standards for all actors working in that context

2. **Limited evidence** that communities have increased opportunities to shape programming, including evaluating INGO work

Box 4. HAG & NIRAPAD 2020:7-8

FORCIBLY DISPLACED MYANMAR NATIONALS/ ROHINYA REFUGEES

4.1 LOCALISATION-RELEVANT ASSESSMENTS AND RESEARCH

In the first 12 months of the crisis in 2017, rapid assessments/action-research were conducted by the Humanitarian Advisory Group and NIRAPAD, GMI, and the Grand Bargain Workstream on Localisation. The Overseas Development Institute (ODI) and the X-Border Local Research Network have been conducting fuller localisation-relevant research since.

HAG & NIRAPAD: When the rubber hits the road

The first localisation-related research was published in December 2017, four months after the large-scale influx from Myanmar started. It was designed by the Australia-based Humanitarian Advisory Group, with interviews carried out by its Bangladeshi partner NIRAPAD (HAG & NIRAPAD 2017; Holloway 2018). Its key observations include:

- Strong 'leadership' from the Bangladeshi Government, restricting which INGOs were allowed to enter the country, closely controlling projects through prior approval requirements, and through recognizing the IOM as lead agency rather than UNHCR (Bangladesh has not signed the 1951 Refugee Convention).

- Local-level civil society however, had little space to take on leadership roles, which was quickly taken away by key UN agencies and a few INGOs as funding for the response increased.

- As early as three months into the response, polarised positions were emerging with 'going local' and 'saving lives' as seemingly opposite alternatives. Distrust emerged soon, and questions were raised about the very high costs of flying in thousands of expatriates with no language- or context knowledge, often for short periods of time and with inadequate handovers.

- Apart from the Bangladesh Red Crescent and BRAC (which at the time had no significant refugee experience), local organisations received no direct funding.

- Collaborations between international and local/national actors tended to be short term and transactional, with the latter relegated to the role of 'implementing partners'.

- NGO co-leads of sectors were nominated early on, but the large majority were INGOs. Only Mukti became a co-lead for the Food Security sector. In these early stages, the Government of Bangladesh was not a core player in the sectoral coordination set-up. Bangladeshi CSOs kept coordinating more with government officials than with the internationals.

> *"International actors largely defaulted to established humanitarian systems and behaviours."*
> *(HAG & NIRAPAD 2017:10)*

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GMI: Debating the Grand Bargain

GMI's rapid assessment was undertaken on behalf of the Disasters and Emergencies Preparedness Programme (DEPP) of the Start Network. Its main objective was to test the 'seven dimensions framework', developed a year before for the Start Fund. It included a workshop in Dhaka with mostly Bangladeshi CSOs present, but also some INGO and UN staff members. The report *'Debating the Grand Bargain in Bangladesh. How are Grand Bargain commitments shaping the response to the FDM/Rohingya influx'* confirmed the above-mentioned issues:

- An international surge led to a recruitment bonanza at the expense of local agencies (including teachers and students from Cox's Bazar district) with disregard for notice periods and no consideration for 'compensation' (even from C4C signatories).

- Coordination forums that because of their style, language and jargon were inaccessible to most Bangladeshi actors and too many in number to be able to dedicate staff to.

- Very little meaningful engagement with affected populations beyond 'needs assessments'.

- Variable qualities of partnership and funding for local organisations.

However, the 2018 assessment also called attention to some other points:

- The occasional occurrence of negative stereotyping and disrespectful behaviour by Bangladeshi towards Rohingya.

- The requirement for Bangladeshi CSOs to be clear what stance they will take should their government engage in involuntary return.

The Grand Bargain workstream on localisation mission to Bangladesh

In 2018, the mission focused on Bangladesh as a whole, but inevitably, the situation in Cox's Bazar attracted much of its attention and confirmed problematic power dynamics. *"For local and national humanitarian actors, particularly CSOs, localisation in the context of the Grand Bargain is about international actors' recognition of and support for their leadership and capacity to lead an effective and accountable response. Many international actors understand localisation from an implementation partnership standpoint and as such there is limited attention and varied appreciation to issues around power, decision-making and leadership. The Rakhine crisis accentuated these differences in understanding of localisation and its end goals (...). In the context of great need, there will always be one reason or another why changing the way we respond, which we are trying to do in the localisation context, will be pushed to the background."* (Mission Report Grand Bargain: Executive Summary).

Key recommendations include that donors enable local actors more, for example by increasing unearmarked and multi-year funding and financing through pooled funds. UN agencies and INGOs need to adopt ethical recruitment practices and create more contextualised and inclusive coordination mechanisms. Local and national actors in turn need to agree on ways to better collaborate, respect and build on one another's strengths (idem). The Workstream mission team also recommends support for *"a sustainable transition in Cox's Bazar"* over three years, leading to a stage where local actors, led by national and local government have greater responsibility for directly managing and delivering the response (idem). Rather surprisingly, this latter recommendation is only directed at the Government of Bangladesh.

ODI: Capacity and complementarity

In December 2018, the ODI published its report on *'Capacity and Complementarity in the Rohingya Response in Bangladesh'* (Wake and Bryant 2018). Key insights are summarised later in this review.

X-Border Local Research Network: Rohingya associations and networks

By the spring of 2018, a good six months after the large-scale Rohingya/FDMN influx, several individuals were already pointing out that Rohingya refugees who had been in camps in Cox's Bazar for longer, had established some associations, and that others were or wanted to emerge among the new arrivals. At the time, relief agencies were, understandably, still focused on streamlining services, communicating messages to the refugees, and setting up a (multitude of individual agency) feedback and complaints mechanisms. Not until early 2019 did a research exercise start to take stock of the associational life among refugees (Olney 2019), a critical input for the Grand Bargain Commitment 6 to a 'participation revolution'.[13]

4.2 THE LOCALISATION DEBATE IN THE ROHINGYA/FDMN RESPONSE

The nature and tone of the localisation discussion in other parts of Bangladesh is not always easy but overall fairly constructive. In the Cox's Bazar context, one has to admit that it is more of a debate that has gotten stuck. This is prone to happen when the international relief sector mounts a classical 'comprehensive' response, assuming that local actors are overwhelmed and have little capacity of their own. In Bangladesh, however, they met with an assertive civil society that is very much aware of international policy- and practice commitments regarding aid effectiveness in developmental and humanitarian situations.

4.2.1 PUBLIC ADVOCACY BY COALITIONS OF BANGLADESHI CSOS

As HAG & NIRAPAD had shown in December 2017, it was not a surprise that the issue of localisation was very quickly adopted by a government and civil society that had shown increasing institutional strengths over the previous decades. After being largely sidelined by the international response (even though they were part of the first responders), Bangladeshi CSOs – particularly but not only from Cox's Bazar – have consistently engaged in public advocacy.

When the first Joint Response Plan (April-December 2018) for the Rohingya situation was prepared, the Cox's Bazar CSO-NGO Forum (CCNF) organised an advocacy meeting in Cox's Bazar (28 February) and in Dhaka (3 March) on the 'integration of Grand Bargain commitments into Rohingya relief and the facilitation of localisation'. Their advocacy wanted to remind the international actors of the commitments they had voluntarily entered into via the Grand Bargain and the Charter for Change (for the signatory INGOs only). They also wanted to discuss pathways to improve the cost-effectiveness of the refugee response, with accountability towards local authorities and via partnerships with local organisations. Government officials were present at both events, also as speakers. The understanding of localisation included 'effective participation of affected populations and community people' (COAST Trust 2018a:2). The results of a rapid survey were presented at both events.

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13 X-Border is a 5-year, multi-country, DFID funded research project in different border areas affected by conflict. It involves the Carnegie Middle East Centre, the Rift Valley Institute and the Asia Foundation and their respective local partners. The Asia Foundation manages the research in this area. See https://asiafoundation.org/what-we-do/x-border/ Other Rohingya related reports can be found here.

This survey showed a moderate involvement of local actors in project designs and a moderate sharing of management fees, but a virtual absence of their co-leadership in the sector system, no capacity-support and a large-scale loss of staff as international organisations 'surged'.

The advocacy eventually obtained a place for two (elected) representatives of Bangladeshi CSOs in the Strategic Executive Group (SEG) in mid-2018. However, three years of requests have not yet led to a Bangladeshi CSO being included in the broader steering of the Intersectoral Coordination Group (ISCG) or the Heads of Sub-Offices Group in Cox's Bazar.

In February 2019, the CCNF issued a critical perspective on the 2019 Joint Response Plan (Cox's Bazar CSO and NGO Forum 2019), and in February 2020 a just as critical one on the next Joint Response Plan being drafted at the time (Cox's Bazaar CSO and NGO Forum 2020). Part of the advocacy centred on full financial transparency, striving to determine the real costs of such a heavy reliance on international agencies and staff. This kind of work was typically accompanied by press releases and/or events and gained attention and circulation in the Bangladeshi media. Other public advocacy focused on the comparative neglect of host communities, but also on the rights of refugees.[14]

"While the capacities of local and national humanitarian actors (LNHAs) in Cox's Bazar are varied, their advocacy role is prominent and is made more so as a result of their networks. As previously discussed, the UN-led system has struggled to increase LNHA representation in their coordination structures, partly leading to the formation of LNHA-led advocacy networks: a trend set by similar actors in other crisis contexts frustrated by perceived exclusion. These bodies advocate for more localised responses and include the CCNF and the National Alliance of Humanitarian Actors in Bangladesh (NAHAB). With financial support from international donors, the stated aim of these bodies includes the fostering of better coordination. Such groups have skilfully used international-level events and initiatives, most recently at the World Bank annual meetings in October 2018, to utilise the global spotlight on Cox's Bazar and hold INGOs and donors to account on their commitments to localise (CCNF/ COAST, 2018)." (Wake & Bryant 2018:31).

Adhering to commitments that international agencies voluntarily entered into, accompanied by the demand to translate them into reality, has made several international actors uncomfortable, especially those that know very little about Bangladesh. However, discomfort can also be found among national staff of international agencies, who are aware of being in a privileged position compared to staff of local and national ones. The result is a climate of tension that can lead to occasional personal attacks on Bangladeshi CSO leaders, calling them 'anti-INGO' etc. This is not correct, however the issue is much more about roles: the driving seat vs. the passenger seat. The tense atmosphere persists.

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14 The public advocacy focuses on the relationship with those international relief actors, who have the most power. It does not look at the relationship between more 'local' CSOs and Bangladeshi CSOs that work in other regions or nationally but were not previously operational in Cox's Bazar. These only started operating in Cox's Bazar because of the refugee situation, sometimes brought along by their long-standing international partners. They too did not have the local knowledge, and would have recruited local people, including from local CSOs.

4.2.2 CONTRIBUTING FACTORS MAKING THE DEBATE MORE DIFFICULT

GMI is convinced that the quality of the relationship between international and national relief actors is key and needs to be at the centre of attention. Bad relationships lead to poor listening, a poor quality of conversation, and behaviours that exhibit and reinforce distrust. If the relationship is poor, little positive change in any practical area is likely to happen. Before looking at the 'Localisation Roadmap' for the situation in Cox's Bazar, it is therefore relevant to list some of the factors that have contributed to a difficult relationship. Unless these will be addressed in perhaps difficult but also courageous and encouraging conversations, the overall situation may remain fairly stuck and will not improve. The issues listed are indicative, not exhaustive.[15] Others would perhaps formulate them differently, the point is that a more constructive interaction must evolve.

From the perspective of local CSOs in particular:

- **A second tsunami:** The term 'second tsunami' was how Sri Lankan actors described their experience of the influx of international relief agencies after the 2004 Indian Ocean tsunami. It expressed their sense of being overwhelmed and swept away in the wake of the natural disaster itself. International relief agencies justify their comprehensive deployment on the ground by arguing that local actors tend to be overwhelmed. They fail to see how their way of operating causes a second wave of being 'overwhelmed'. In Bangladesh, local CSOs, often with years of solid programming track records, strong connections in Cox's Bazar and with local authorities, a sense of identity as civil society actors, and with a longer-term vision to improve the situation in this comparatively poor district of Bangladesh, suddenly found themselves with the option of either being pushed aside or becoming a sub-contractor to an international agency. The latter would just arrive, without any context knowledge, and simply assume authority. Agencies recruited the local CSOs' best staff and believed that they were in a position to assess whether the locals had the necessary capacities or not. A constructive conversation must include empathy for this experience.[16]

- **A recruitment bonanza:** What international agencies will describe as their successful surge, in practice involves rapid mass recruitment of national staff. Local but also national Bangladeshi organisations saw their staff being swept up by the thousands, without respect even of legal notice periods. Especially the qualified local staff was sought after, because the Cox's Bazar dialect is relatively close to the language the Rohingya speak, whereas Bangla is not. Even schools were affected as teachers and students alike went for better paying jobs with international agencies. In practice then, local actors are an important capacity source for international agencies. It is particularly vexing then that those who first recruit away some of their best 'capacities' subsequently turn around and say you have no capacity.

- **Problematic behaviour:** Important decision-making positions remained largely reserved for international staff. While a good number of these staff members brought ample and relevant experience into the country, the reality is that too many did not. Some had just been interns only a few weeks earlier. Very few had any understanding of the local

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15 These derive from past and ongoing listening by GMI to different actors.
16 Imagine the 2015 influx of large numbers of refugees and economic migrants in Europe or similar waves seeking to enter the USA through Mexico. How would European and American agencies feel if large numbers of Malaysian, Chinese, Indonesian, South Korean, Japanese, Indian, Kenyan etc. NGOs landed in these Western countries, hired away thousands of staff from their national and local agencies, unliterally judging their capacities, installing the coordination structures of e.g. the ASEAN Coordinating Centre for Disaster Assistance, and using two ASEAN languages for their meetings. Would we graciously agree that this was the best possible approach?

context, including the decades-long prior history of the Rohingya refugees' presence in Cox's Bazar, or the track records of local agencies. Hardly any of them spoke Bangla. The (understandable) emphasis on lifesaving- and more technical actions meant there was little interest in acquiring a deeper background understanding.[17] Moreover, at least during the first year, many came only for brief periods of time, making it even more difficult to gain a deeper understanding and build meaningful relationships. A kind of intrinsic assumption of superiority, sometimes implicit in certain behaviours, sometimes very explicit, will not lead to constructive relationships. As the director of an INGO, with significant personal international experience, observed: *"I saw them implementing programmes in the same way they did in Somalia and South Sudan, as if there were too few credible local organisations here in Bangladesh!"* And: *"It is a limited number of international humanitarian workers who set the tone and course of a response, and it was all about direct implementation."* The short anecdote below provides an illustration.

> **Anecdote**. An international NGO, specialised in public communications, has recently deployed a full-time international staff member to Cox's Bazar. The agency and the staff member are new to Bangladesh. They are not yet registered and are also not sure how to go about getting technical licenses for some of the work they plan to do. Someone provides them with the contact details of the Bangladesh NGO Network for Radio and Communication. This network has a long track record, historically originating in Cox's Bazar, and is well connected with all relevant government institutions.
>
> The person who had established the connection assumed that the Bangladesh Network for Radio and Communication would perhaps be offering the newcomer insights into the official requirements and – possibly – some introductions and useful advice. However, the first message of the INGO representative to this network's director was *'**How can we help you?'.** When the liaison person suggested that this might not be the right tone and approach, as the INGO rather needed help from the Network, the representative replied: *"**They are a national entity. National agencies always need something from us."** Less than a year later, the international representative was gone.

***Box 5**. Anecdote

- **Wastefulness:** From the perspective of many Bangladeshi CSOs, international relief agencies are very wasteful: expensive (and rotating) expatriates, a lot of international travel, lodging and offices in hotels, each agency setting up its own infrastructure, and enormous 'coordination' costs involving a huge number of meetings that take up lots of staff time. The global financial support for this kind of set-up will eventually dwindle, it is imperative therefore to make the available dollar not only arrive fast but also go far.

- **Exclusion from decision-making spaces:** While local NGOs had long-standing coordination practices with local authorities at district and sub-district levels, the international relief sector rapidly scaled up its own coordination system.[18] Comprehension of the conversations in these meetings was challenging, not only because English (in different accents) was the dominant language, but also because international relief actors use acronyms and many internal references that only an insider in the international relief system can understand. Few Bangladeshi CSOs participated in these meetings, nor would their presence have meant meaningful participation or an ability to influence outcomes.

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17 A contributing factor to this is that many international relief agencies, for a major L-3 type crisis, will deploy specialised emergency personnel and manage the response from elsewhere than their regular country office. Global technical and thematic expertise, standards and approaches are used, with little understanding of the deeper social, economic, political and historical aspects of the context.

18 Scaled up' rather than 'set up' as IOM, following a bigger influx of Rohingya already in late 2016, in the spring of 2017 had started putting in place the foundations of what would become the ISCG. For the first year at least, the international coordination structure, except for the Bangladesh Ministry of Health, largely operated in parallel to the governmental one.

- **Neglect of the host population:** Although members of the host population did benefit from the massive aid investment, the overall environmental and economic impact of now 1 million refugees on the (outnumbered) host population, has been hard. At least during the first year, very little of the international aid was also earmarked to support the host population. Local CSOs felt they had to persistently campaign for a shift of attention also to the host population.

- **Honour your commitments:** All major international relief actors, certain donors, the UN and Red Cross and Red Crescent Movement, voluntarily signed up to the Grand Bargain commitments. It is therefore legitimate to ask how these are being implemented in practice. The fact that 4.5 years after the Grand Bargain and three years after the rapid internationalisation in Cox's Bazar, there is still no clear intentional move towards localisation by design, casts doubt on the integrity of those commitments. Leaving the country-level position on localisation to the personal likes or dislikes of a senior manager or humanitarian advisor, cannot be taken seriously. Other institutional commitments, e.g. to combat fraud and corruption, sexual abuse and exploitation, or to work for gender equity, are not left to the discretion of the same individuals either. In the same vein, Bangladeshi nationals, citizens of a UN member state committed to good global governance, may well ask whether the UN is focusing on its core rights-focused mission or spending too much money, energy and attention on service-delivery, which others can take care of very well on their own.

The perspective of the international agencies:

- **No experience with refugees:** Bangladeshi CSOs may have great experience with natural disasters but do not have the required expertise related to refugees and refugee protection.

- **Overrating their capacities:** Acknowledging their prior experience, this does not mean CSOs have the capacities in all the technical and thematic areas to operate programmes at the scale required here.

- **Localisation does not apply:** Bangladeshi CSOs, including those from Cox's Bazar, are not 'local' to the Rohingya population.

- **Disrespect towards the Rohingya:** There are mixed feelings among the Bangladeshi population, including the people of Cox's Bazar, about the Rohingya. Some maintain humanitarian empathy, others had empathy at first but lost it now that the negative impacts are becoming clearer and the prospects for the refugees' return in the short-term are not good. Others had negative perceptions and reservations early on, leading to rising tensions (Oxfam 2019). These mixed feelings prevail among the staff of CSOs as well, and not all act with empathy and treat the Rohingya with dignity. There is justified concern about the strength of the first humanitarian principle of shared humanity. (This of course also applies to Bangladeshi staff at international agencies and international staff. The phenomenon might be overestimated among national and local actors and underestimated among staff of international organisations. See e.g. Crisp 2018).

- **Ambiguity towards relocation and repatriation:** Bangladeshi CSOs have a long tradition of working constructively with local and national authorities. It is not certain whether they will stand up for refugee rights should the government proceed with involuntary repatriation to unsafe conditions in Myanmar. This is a second concern related to principles.[19]

- **Bias towards host population:** Local CSOs can be biased in favour of the host population that they are closely connected to, and that their staff may belong to. Here again, there is a concern related to fundamental humanitarian values.[20]

- **Public campaigning and misrepresentation in media:** CSO public campaigning, with articles appearing in the national and local media, sometimes misrepresenting the facts, is unhelpful and can even lead to security concerns for international aid workers.

- **Monopolising the localisation conversation:** Vocal advocates for localisation inappropriately control the conversation and crowd out variations in perspective and positioning among CSOs.

There are partial truths in both sides' arguments. But so far, the exchanges tend more towards positional debates than constructive dialogues.

Some international agencies have argued that focusing on the differences is not helpful, and that NGOs/CSOs should rather explore what they have in common. For national and local actors however, the power and resource inequalities, for example, are part of their everyday experience of these 'differences': *"You say that there should not be divisions between international and Bangladeshi NGOs, that we are equal as NGOs. But we cannot rent the same kind of offices and workshop facilities you do, we cannot go in the same type of transport, we cannot not eat in the same restaurants. So do not tell me we are equal."* (Bangladeshi CSO leader at a national conference March 2018).

Some have proposed to bring in facilitators to help change the tone and nature of the conversation, but this has not won much support. The situation mostly presents a problem for the Localisation Task Force for the Rohingya/Cox's Bazar situation, and the potential to implement the Roadmap for Localisation in this context.

4.3   THE LOCALISATION TASK FORCE AND THE LOCALISATION ROADMAP

In mid-2019, a year after the Grand Bargain Workstream mission to Bangladesh, a 'Localisation Task Force' was created (No author 2019), co-chaired by the IFRC and UNDP (i.e. no Bangladeshi co-chair). A year later, this task force received a draft 'localisation roadmap' from the Centre for Peace and Justice at BRAC University, setting out a detailed 3-year roadmap. Since the final draft was still not cleared at the time this report was put together, references here can only be made to the June 2020 draft version.

- **Understanding the rationale of localisation:** The roadmap shows good understanding of the rationale of localisation: Bolstering national leadership on crisis-management and honouring local responsiveness. It suggests maximising cost-efficiency and to improve value-for-money by reducing extensive sub-contracting with its high transaction costs. It wants to make more and better use of local expertise and to improve efficiency, in line

19 International agencies should be careful when assuming the moral high ground here. Historically, they have not always made a firm stance to ensure Rohingya refugees in the past continued to be provided with the necessary basic services and were protected from involuntary and unsafe return. See Crisp 2018.
20 Similar ambiguities and biases can of course also exist among the thousands of Bangladeshi staffing international agencies. There is a possibility that these risks are overestimated among national and local actors and underestimated among staff of international ones.

with a contextual understanding of local dynamics, language and culture and around a shared responsibility (No author 2020:11 – 12). The roadmap also envisages a more meaningful involvement of the Rohingya, and more support for their self-reliance activities. It correctly holds that *"localisation does not mean the withdrawal of international- but rather complementarity and partnership-based models."* (idem:12). This approach agrees with the perspective of Bangladeshi CSOs.

- **Definition of localisation:** The roadmap offers a broad definition: *"Localisation occurs when an activity formerly performed by an international actor with a certain skill set is taken over by a local actor having a similar skill set."* (idem:14). It presumes that there will always be activities that cannot or should not be localised, such as fundraising, while others should never be internationalized, such as refugee burial rites. What is deeply problematic about this definition is its assumption that international actors are inherently superior to national and local actors, at least while they are present in large numbers and well-financed. Should the above definition become the global yardstick, then the international relief sector needs to expand at least 100-fold, to be present with its high standards in every location in the world where a crisis with humanitarian consequences occurs. This is not feasible financially or politically. Such definitions also provide a justification for international relief agencies to expand a similarly extensive footprint to any other location within Bangladesh wherever they believe Bangladeshi actors do not operate with the same skill sets.

- **Incorrect interpretation of history:** The definition, the roadmap, and presumably the surrounding conversations, are also incorrect in the historical context of Cox's Bazar. They simply ignore the fact that there had already been a few hundred thousand Rohingya/FDMN in the district for many years. Prior to the late 2017 developments, their needs were by no means met according to international standards. Admittedly, few international agencies would have been able to provide services under the then government policy. This earlier refugee population did not attract significant donor interest, and even UN agencies did not advocate forcefully for greater attention and support. In Cox's Bazar, localisation needs to be understood in light of a recent wave of massive internationalisation, which has as much to do with global media and political attention as with humanitarian needs and standards. Should the situation remain as it is, and other crises gain global attention, these Myanmar refugees may find themselves back in the situation they were in around 2014, or that Burundian refugees in Tanzania find themselves in today.

- **Micro-contextual:** The roadmap does not seem to draw inspiration from other localisation-relevant experiences and developments in the country.

- **Driver of localisation:** Recognising the multi-dimensional nature of localisation in practice, the complexity of so many agencies, but also the difficult relational atmosphere, the team that developed the Localisation Roadmap, very interestingly proposes that there needs to be a 'localisation driver' (idem:82 – 85). According to them, this must be an independent entity, with a strong mandate backed at the highest levels. It needs to be someone with management capacity but overall adopting the role of enabler, supporter and monitor, to ensure that the roadmap is effectively implemented. This leads to two questions: Who can fill this role? And would international donors, and UN agencies in particular, who have most of the power and control over resources in this context, show commitment to turn this agenda into practice?

5 CORE DIMENSIONS OF LOCALISATION

In 2017 and 2018 GMI identified and tested several dimensions for the Start Network regarding the collaboration between international agencies and national/local NGOs, that are particularly important for the latter. Grand Bargain commitment 6 for a 'participation revolution' was also included, in which crisis-affected people can have a meaningful say in what is designed and decided for their benefit. The framework puts the quality of relationship first, not the funding. The framework was adapted and enriched with indicators by the Humanitarian Advisory Group & PIANGO in the Asia-Pacific region. GMI also added several cross-cutting issues to these dimensions, among them: accountabilities, humanitarian principles, gender and localisation and risk management.[21] The guiding questions for this inquiry focus on the quality of relationship ('partnership'), finance, capacity and coordination mechanisms, and the cross-cutting issue of gender and localisation.

5.1 THE QUALITY OF RELATIONSHIP

Lack of trust: A lack of trust was observed during the Start Fund in Bangladesh review by Patel in 2017. This even applied to agencies with partnerships that had existed for many years: *"Also in Bangladesh there are issues of real trust between international and national NGOs. National agencies are reluctant to speak up and will filter or whitewash critical comments about those on whom they dependent to variable degrees for funding. 'Domineering' behaviour by staff of international agencies was a regularly used term, which would not easily be openly mentioned in joint conversations. It cannot easily be 'measured' but is easy to observe."* (Patel 2017:22). This research revealed a lack of awareness, let alone use, of the 2007 Principles of Partnership, in which a clear majority of Bangladeshi CSOs want to be more 'decision-making partners' and not just 'implementing partners' (Patel 2017:25).

Distrust and instrumentalisation of national and local actors have also been documented for the Rohingya/FDMN response: *"Crucial deficits in trust and risk undermine many interactions between those involved in the response and affect their capacity to respond. Trust was noted to be particularly low between INGOs and the government. From the perspective of the former, this is at least partly a result of the government's assertive stance against INGOs, including barring some aid organisations from operating in the camps and dictating what specific kind of aid is allowed in. (...) Trust deficits were also in evidence when assessing partnerships between INGOs and local and national humanitarian actors (LNHAs). Respondents from both groups highlighted the importance of trust, noting that it took so long to build that it was still too early to assess newer partners in this response. (...) the risks involved with partnering with an 'unproven' organisation (expressed by INGOs in the form of financial and legal liabilities to donors or isolated examples of aid diversion and corruption) were also a substantial barrier. Some INGO respondents accepted that their organisation's risk tolerance was too low and prevented them from forming more equitable partnerships. But several senior INGO respondents saw their agencies' key strengths as delivering large amounts of relief to high standards, across their partners. Any further shift in power toward LNHAs would mean large investments in their staff engaging in quality control functions to ensure standards remain acceptable. (...) Such views are consistent with previous studies that note a 'tension' between international commitments to support local capacity and increasing demands for quality, scale and contractual compliance and risk."* (Wake & Bryant 2018:27-28).

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21 For a detailed explanation of the framework, and cross-cutting themes, see 'Dimensions of Localisation' at https://www.gmentor.org/equitable-partnership

Transactional assessments rather than exploring complementarities: The term 'partnership' usually implies the conscious choice of two or more organisations to collaborate more closely in pursuit of a shared goal or objective. These kinds of partnerships are based on each partner's contribution of important values complementing those of the others, and a sense that the working relationship is constructive (see GMI 2020a). Complementarity is a core principle in the 2007 Principles of Partnership. If complementarity were indeed a core operating principle, then partnering should be a mutual choice. As ODI research has shown however, the prevailing posture of international relief agencies is not to see how they can complement national and local actors. Their starting point is rather to do what they want to do, and only where they experience limitations will they look for who can complement them – national or international (Barbelet et al. 2018:15-16, Barbelet 2019:6). As a senior INGO manager put it: *"International actors did not take local actors in complementarity; similarly local actors did not take international actors in complementarity. We must bring complementarity, not replace the local capacity with another capacity."*

In the international relief sector, a one-sided 'partner selection' prevails, based on capacity-assessments in which the international agency decides which capacities count. De facto, this may turn out to be more of an assessment of who can serve as a useful sub-contractor. Calling it a 'partnership' is an abuse of the term, diminishes the quality of relationship that is implied by it, and hides the power asymmetry in the relation. Subsequently, the national/local actor may become 'my partner' as if the international agency has some proprietary right over it.

In general, international aid workers show little awareness of how humiliating their practices can be for national and local actors. *"Capacity assessments – primarily focused on operational capacity – often form part of the partnership selection process undertaken by international actors. One interview respondent described how a UN agency involved in the response had managed their capacity selection and strengthening in Cox's Bazar. The process was led by a consultant and donor driven team (compromised entirely of international members) who selected criteria (including length of experience working in the area and sound management), then shortlisted 15 NGOs operating in Cox's Bazar against those criteria. About half of those shortlisted were then chosen to be partners, and underwent training on humanitarian principles, since many NGOs did not necessarily have knowledge of this or experience in refugee response. (…) The top-down nature of such processes can, however, limit the role of LNHAs in determining their own needs regarding capacity strengthening and result in a limited understanding of the full scope of what local actors stand to contribute to humanitarian response."* (Wake & Bryant 2018:20).

Bangladesh CSOs: work with and do not undermine civil society: In some countries (e.g. Jordan, South-Central Somalia) international relief agencies criticise local non-governmental organisations for not seeing themselves and acting as 'civil society'. A prominent feature of Bangladesh is that non-governmental actors very strongly see themselves as 'civil society', with an important role next to the government and the private sector. They demand to be recognised and treated as such, as the quotes in the text box show. Also, government officials acknowledge the value that Bangladeshi CSOs can offer as they provide services where the government and the UN do not reach. If a COVID vaccine becomes available, they will have a key role in making it widely available, just as they are indispensable in the pursuit of the Sustainable Development Goals (senior official Ministry of Foreign Affairs).

> **"We are not just the relief giving organisations we used to be, we have developed hugely. We are a vibrant civil society with several decades of achievement."**
>
> **"The Rohingya situation cannot lead to a denigration and downgrading of national and local CSOs."**
>
> **"Let us grow up within our own space, and with our own dignity."**
> (Different CSO leaders)

Lack of coherence within UN: Bangladeshi CSOs note that different UN agencies have different practices in how they collaborate or partner with national and local actors. If the UN is expected to work as one, however, why is there not a more coherent practice in this regard? (question from an interviewee).

Equitable partnerships based on mutual respect: Bangladeshi actors that are demanding stronger localisation are not against international presence and assistance. They just object to being 'downgraded' in their own country, to becoming external actors. They want to be treated with respect and trust 'until proven guilty', rather than with distrust until proven otherwise. They want more 'equitable partnerships' or 'accountable partnerships' as they put it. They want to be 'decision-making partners' not just 'implementing partners' of someone else's agenda and designs.

> **"We are on the same page, we are not rivals. We want to feel that the UN is next to us, with us, not above us."**
>
> **"Bangladesh CSOs have come a long way since 1971. We deserve respect from the international community, the UN and donors, as equal partners."**
>
> **"This is our just demand: we want to be treated as equal partners."**
>
> **"We have seen an influx of thousands of consultants. For long years now, we managed without them and had the trust of the donors. We do not need all these 'experts' here."**
>
> **"How can you have partnerships with such huge salary differences?"**
>
> **"We do not want to be put, forever, into the passenger seat in our own country. We want to be in the driving seat and welcome you – in the passenger seat."**
>
> **"This patron-client relationship makes us feel undermined and inferior."**
> (Various CSO leaders)

5.2 FINANCE: ACCESS, QUANTITY, AND QUALITY

5.2.1 PRE-FDMN/ROHINGYA 2017 CRISIS

Significant humanitarian funding to Bangladeshi CSOs: The report 'Money Talks', published in 2018 but referring to figures from 2015, paints a perhaps surprising picture. First, it highlights the central importance of domestic, governmental funding. *"The main sources of humanitarian financing in Bangladesh are the domestic government through the Ministry of Disaster Management and Relief and international assistance provided by foreign governments and private donors. Between 2012 and 2016, annual domestic government funding for humanitarian-related activities ranged between $715 million and $1.1 billion. (...) "This research identified $62 million in humanitarian funding from international donors to Bangladesh in 2015. (...) Of the total identified funding for Bangladesh, at least $12 million (20 percent) is known to have been given directly to LNHAs, though this consisted entirely of funding from international government donors to the Government of Bangladesh (GoB) (...) A further $12.2 millions of investigated funding was given indirectly to LNHAs in Bangladesh via international agencies such as the UN, INGOs, and RCRC societies. This brought the total amount of international humanitarian funding known to have been directly or indirectly transferred to LNHAs in Bangladesh to at least $25 million—39 percent of all funding identified in this study."* (Oxfam International 2018:7-8).

"INGOs received the most first-level funding ($21.9 million, or 35 percent of the total) from donors. All investigated private funding and funding from INGO donors and the INGO-led Start Fund went to INGOs, as did the greatest share of investigated government funding. UN agencies received $14.5 million (23 percent of the total) and RCRC received $11.0 million (18 percent). The data suggests that UN agencies transferred a greater share of the funds they received to LNHAs than INGOs and RCRC did." (idem:10-11).

Almost 40% of the international funding investigated going to Bangladeshi CSOs shows the strength and significant role that Bangladeshi civil society plays in humanitarian action, according to the authors of the study. They also note, however, that this does not necessarily lead to an actual influence on decision-making or strong ownership of projects and programmes. This kind of funding distribution may very well reflect a Bangladeshi civil society with many good sub-contractors and implementing-, but not decision-making partners.[22] These figures also do not reveal anything about the quality of the funding, which is a more critical factor for the financial viability of an organisation than quantity. Quality of funding refers to e.g. coverage of core costs in principle through a flexible management fee (ICR or internal cost recovery), regularity of cash flow, predictable funding, longer term funding etc. It is possible to pass significant amounts of funding through national and local actors, while treating them as cheap contractual labour. From this perspective, the Grand Bargain quantitative target of 25% by 2020, is inadequately framed (see GMI 2019). Overall figures also hide the difficulties of access to quality funding for women's rights and women-led organisations.

Earlier barriers to direct funding: The authors of the report point out the following perceived barriers to direct funding: *"A lack of capacity in proposal writing and grant management, weak English language skills, domestic competition and dominance of one or two very strong NNGOs preventing others from accessing funding, and a lack of trust by international actors to manage funds.*

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22 Several Bangladeshi CSOs have been receiving direct foreign funding for years. Examples are Suhilon, Rupantor, GUK, YPSA, Dhaka Ahsania Mission, Sajida Foundation and BRAC. (see e.g. Social Development Direct 2015). Some of this funding comes from traditional Western sources, others from Islamic ones.

Long-standing dynamics and relationships also make it difficult for LNHAs to challenge the status quo, while international agencies are in the driving seat when it comes to setting agendas due to their size and existing relationships with donors. Finally, a lack of local leadership and representation through formal networks dampens the collective voice and limits collective negotiating power." Suggested recommendations to address key barriers were: *"Building the capacity and financial sustainability of LNHAs and encouraging more joint funding proposals between international agencies and LNHAs. Also, given the significant and growing volume of domestic funding for disaster management, one should align international actors' humanitarian strategies with the GoB's disaster management plan in order to strengthen relationships between the GoB and other LNHAs."* (Development Initiatives 2018:7 – 8).

Bangladeshi fund managers: Donors do not have the staff to manage a multitude of contracts. They prefer to provide larger grants to someone else to act as fund manager, which has the added benefit of transferring the risks. Globally, such fund managers are mostly UN agencies, sometimes INGOs, and increasingly private sector companies. There is no intrinsic reason however, why national organisations should not take on that role. A good example is the Manusher Jono Foundation (MJF). It started in 2002 as a CARE project and became an independent entity in 2006. In 54 districts, it provides funding and capacity support to Bangladeshi organisations on issues related to human rights and governance. Some are large- and many are grassroots organisations. The MJF supports activities on behalf of marginalised groups such as landless labourers, fisherfolk, religious and ethnic minorities, sex workers, working women and children victims of violence. The foundation also engages in advocacy for the enactment of laws and policies that protect rights. It is very active on women's rights and supports the Sustainable Development Goals. DFID has been a consistent funder, but it has managed larger envelopes also from e.g. the Swedish, Canadian and Australian governments. *"We are a link between smaller CSOs and donors".* It has helped several Bangladeshi CSOs to now access direct funding (senior staff MJF).

Cost-efficiency: One underlying concern that the Grand Bargain seeks to address is the growing humanitarian financing gap: global humanitarian needs are rising faster than the humanitarian funding available. The COVID-19 impact is likely to make the gap even bigger. From that perspective, the Grand Bargain wants to reform the humanitarian economy, making it more cost-efficient, for example by reducing transaction costs. A 2019 Start Fund Bangladesh study found that there can be up to five intermediary transaction layers before funding reaches the intended beneficiaries, each of course carrying a cost (Raihan 2019:6).

The Start Fund/Hub in Bangladesh and some INGOs working with partners in Cox's Bazar are also realizing that Bangladeshi CSO are delivering services equivalent to those of INGOs at significantly lower costs. This serious finding also supports the long-standing CSO challenge to the costly footprint of international agencies in Cox's Bazar. Already in early 2018, donors in Dhaka recognised that such high costs were not sustainable (GMI interviews 2018). As we will see, some INGOs are now shifting from direct implementation in Cox's Bazar to working with partners, not out of a commitment to localisation, but because funding has become less abundant.

Management Fee/Internal Cost Recovery: All organisations, including international ones, need a certain amount of flexible income to cover core costs, deal with cash flow fluctuations, build up reserves and invest in their organisational development. The quality of funding is often more important than the quantity – a fact that the Grand Bargain originally

did not take note of. GMI managed to raise awareness on the quality/quantity significance in 2017 and 2019, and the Grand Bargain Workstream on Localisation pays more attention to this issue now, putting the spotlight on the management fee/ICR or internal cost recovery. International relief agencies, UN and INGOs alike, receive such management fees from donors. National and local CSOs often do not, or if some of their core costs are written into the budget, they are heavily earmarked – in violation of Grand Bargain commitment 8 to reduce earmarking.[23]

The equal allocation of such management fees to national/local organisations, or its sharing if the grant goes through an international agency, is a difficult issue. Several country-level INGOs do not even get the ICR from their international headquarters themselves if the grant is received there. It fully stays with their HQ, as it contributes to covering their costs. Some INGOs in Bangladesh have started to ask their headquarters to pass some of the fees on to them, also in order to share them with Bangladeshi partners.

Those INGOs that are willing to play a predominantly supporting and reinforcing role, 'merely' acting as enablers for direct funding for national/local actors might be facing a dilemma: They still have value to add and a role to play in a mentoring, advising and accompanying capacity. Even with reduced staff numbers, they will still need funding to hold on to experts with the necessary skills needed in advisory roles rather than in controlling or implementing roles. Will donors recognise this catch when they increase direct funding to national/local agencies?

5.2.2 FUNDING IN THE ROHINGYA RESPONSE

Significantly different funding streams: The above-mentioned picture contrasts starkly with the initial funding for the Rohingya 2017 crisis response. By December 2017, some 69% of the allocated funding went to UN agencies, 20% to INGOs, 7% to the Red Cross and only 4% directly to Bangladeshi NGOs. Most of these 4% went to BRAC and the Bangladesh Red Crescent (Shevach et al 2018:17).

No ethical recruitment yet no compensation: The rapid and comprehensive international surge to respond to the large-scale influx of Rohingya/FDMN in late 2017, had a dramatic impact on many Bangladeshi organisations, especially in Cox's Bazar. They lost many experienced staff to build up the capacity of international actors with more financial resources. Significantly, this often meant losing years of investment in staff development. Legal notice periods were not respected and, contrary to a clear commitment made in the C4C, even its signatory INGOs did not offer meaningful compensation. Ethical recruitment guidelines now exist – but whether they will be respected in future remains to be seen (Tordoff 2017).

Transparency around expenditure: Commitment 1 of the Grand Bargain requires all actors to publish more complete data on income and expenditure of humanitarian funds. Bangladesh CSOs have been calling for greater transparency about the financing of the Rohingya/FDMN response. They have also expressed concern about the high costs incurred by large numbers of internationals rapidly rotating with short missions, needing expensive accommodation, office space, transport and period sorties from the country if their visa are valid only 3 months.

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23 One INGO interviewed has adopted a practice where the partner writes the budget that they require for the work they undertake, to ensure all real costs are included.

More and better-quality funding for local responders: Commitment 2 of the Grand Bargain clearly states that an increased proportion of overall funding should go to local actors, and donors and first receivers commit to reducing the administrative barriers so that this can happen. It is therefore worrying to see some international actors in the consultations for the Localisation Roadmap calling this transfer into question (Centre for Peace and Justice 2020:26).

Pooled fund: Pooled funds can help reduce fragmented funding, which produces fragmented results. Pooled funds are also recommended in the Grand Bargain as a mechanism that can provide better access to finance for CSOs. For some years now, Bangladeshi CSOs have been asking for a pooled fund, with at least a part of it reserved for them. *"Local and national humanitarian actors (LNHA) demand that their own $4 million fund be governed by a steering committee comprising the Resident Coordinator and other LNHAs. The fund would be intended for supplying the smaller amounts of funding needed, but this so far has not been taken forward. Several INGO representatives reported LNHAs' access to so-called 'pooled funds', but these tend to be run by INGOs, somewhat reinforcing the power dynamics of the current 'partnership' models. (…). The small initiatives that do exist, such as a $5 million UNDP scheme for capacity strengthening LNHAs, do not fundamentally alter the fact that increased investment for capacity without increasing opportunities for organisations to access direct funding, is a key issue in hindering a more complementary approach."* (Wake & Bryant 2018:30). The 2020 Localisation Roadmap takes up the idea and proposes such, managed locally in Cox's Bazar, with harmonized proposal- and reporting formats, and greater accessibility for CSOs. There would be two management options: The Interagency Coordination Group or a national agency. A mixed management set-up would also be possible. However, once again, its proposed output and activities leading there only envisages Bangladeshi CSOs making the effort to be fit-for-the-international system. The Grand Bargain, however, is a commitment to reform the humanitarian sector in a way that also requires this international system to adapt and change so that it can better partner with and support national and local actors.

The CSO sector's financial sustainability: Compared to other countries, more CSOs in Bangladesh have a higher degree of financial autonomy from international aid. However, thousands of them remain highly dependent. Their medium-term financial sustainability seems an issue of strategic concern. The Bangladesh government is striving to formally make the country a 'middle-income country', relying more on trade and foreign investments to drive the economic development than on international aid. In other countries, obtaining formal recognition as a 'middle-income country' has often led to a dramatic reduction in official development assistance, decimating the CSOs and NGOs depending on it. This ongoing transformation in the country could be a collective, strategic threat to the Bangladeshi CSO sector as well, meriting more and close attention and proactive steps.

5.3 CAPACITY AND COMPLEMENTARITY

A vague term: The international relief sector discusses 'capacities' in general terms but is rarely specific about it.[24] The key questions are: Whose capacities to do what? Who determines what counts as a 'capacity'? Who determines what counts as 'good enough capacities'? What changes when 'good enough capacities' have been acquired? *"We have failed to define specifically what we consider to be a capacity, in specific ways."* (senior manager INGO).

Bangladeshis provided the bulk of the surge capacity: Bangladeshis contributed very significantly to the success of the massive international surge to support the fleeing Rohingya/ FDMN. From that perspective, national/local agencies were mostly a first training ground for international agencies. *"Bangladeshis provided the bulk of the international surge capacity."* (senior staff INGO). The NGO Forum for Public Health for example, a respected national actor in the WASH sector, within months lost 50 of its staff, so that international agencies could build up their capacity and expertise (GMI 2018 interview).

The power in capacity assessments: International agencies are the ones who decide what counts as a 'capacity', emphasizing organisational governance- and management systems and technical/thematic expertise. International standards and compliance requirements are the guiding principles for them. Contextual knowledge, established networks, perceived local legitimacy or the ability to navigate social and political sensitivities do not seem to count as much, nor do past experience, track records, or the commitment and dedication that national and local actors display. The massive experience that Bangladeshi CSOs have in community mobilisation and in the strengthening of community-capacities also tends to be overlooked.

The capacity trap: Among international relief actors, the issue of the national/local actors' capacities tends to be dissociated from that of their finance, but for the national/local actors, the two are connected: Without access to quality finance, they cannot attract or retain staff whose personal competencies include organisational capabilities.[25] *"You cannot retain capacity, if your core costs are hardly covered."* (senior staff national CSO). The result can be a vicious circle: Because you have no capacity today, we will not fund you – as a result of which you cannot develop your capacities tomorrow etc. This forces national/local actors into sub-contracting on terms often not advantageous to them, and to live from project to project. Some senior managers and directors of international agencies are not comfortable with the situation and want a more supportive approach: *"We need to share the responsibility and burden of compliance with them, not push it all onto them."* A distinctive feature of the ELHNA project is that it combines capacity-support with a possibility to accessing financing. Bangladeshi CSOs argue that if they were able to obtain the same level of quality financing over a number of years that international agencies have access to – a similar management fee to start with for example – they would indeed be able to also meet international standards and requirements. *"You cannot get to an international standard with low, local standard, resources."* (CSO leader).

Deficit thinking: Prevailing practices encourage a spirit of deficit thinking when it comes to capacity assessment, i.e. looking for gaps and shortcomings rather than potential and skills. This leads to a rather pessimistic view, underpinning the basic premise of the Localisation Roadmap: If the glass of national/local organisations is largely empty, that of international agencies must be full: *"UN agencies interviewed framed capacity strengthening as something that*

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24 "It is challenging to objectively 'assess' capacity in context, given the lack of a shared understanding of what the term means: the multifaceted nature of capacity and differing values attributed to certain types of capacities (such as strong emphasis by international stakeholders on minimising fiduciary risk and strengthening technical, measurable capacities); lack of adequate measurement mechanisms (what makes capacity sufficient or insufficient?), and limited recognition of the fluidity of capacity and how it evolves over time (as a crisis/response shifts from emergency to protracted)." (Wake and Bryant 2018:17).

25 They cannot hope to retain experienced people in an environment where many international actors offer far higher salaries and benefits and at the same time often determine lower' salaries and more demanding working conditions for their 'partners', as part of their grant making.

was needed for others, not their own organisations." (...) There was little sense in our research that international stakeholders felt they should learn from or adapt to Bangladeshi partners, rather, it was often a question of how LNGOs could fit into international processes and reporting commitments, with training used as a tool to try and propel local organisations from where they were to where they needed to be to interface with international organisations." (Wake and Bryant 2018:20).

According to the Localisation Roadmap, local and national CSOs show weaknesses in humanitarian ethics and values, gender equality, sometimes in technical competencies (e.g. camp management), or in managing human resources. The Roadmap also recommends including civil servants in any learning programmes (idem:22/54 − 55), also giving them access to on-line learning opportunities[26] and to a database of national and international experts (idem:63). The main shortcomings among international agencies are seen in their missing context-knowledge, and their lack of language skills and cultural sensitivity. This reinforces the image that the main contribution of local and national actors is their context knowledge, but without the necessary or relevant programming experience (idem:21). This contrasts with earlier observations by the ODI researchers: *"In Cox's Bazar, local and national NGOs and community members also have technical and localized knowledge and offer better value for money than many international organisations. For example, some have significant experience responding to disasters and implementing WASH projects, including technical aspects pertaining to topography, flooding, and the effects of deforestation. Respondents from some international organisations recognised the capacity of local and national NGOs to engage with the government, because 'they share a common lingua franca with local authority."* (Wake and Bryant 2018:18). Several Bangladeshi CSOs, including local ones in Cox's Bazar, also have strong gender programming experience. And if indeed international agencies still found it wanting, why do Bangladeshi women's organisations still find it so much more difficult getting funded? To a degree then, 'capacities' are in the 'eye of the beholder', and their assessments not as objective as international aid actors like to claim.

Capacity building for localisation as a new source of income: The power dynamics around 'capacities' justify international agencies' requesting more funding for further 'capacity-building' − funding that can now be presented as contributing to localisation. Some INGOs have been partnering with Bangladeshi CSOs for decades and have invested very much in capacity-building. It is difficult to believe that these CSOs still do not qualify for direct funding, work as 'decision-making partners', or assume full leadership. Instead, some INGOs still present proposals to donors in which they ensure the competencies and credibility of their national partners, yet simultaneously claim a continued need for them to maintain oversight and invest in more 'capacity-building'. One argument is that the international relief world is constantly evolving, with new types of programming (e.g. cash) and new technologies (GMI observations 2017 − 2020). In other words, the goalposts keep shifting. Why would more of the same lead to different outcomes?

Eternal students: Bangladeshi CSOs experience the same reality as national/local actors in other countries: they remain eternal students without there ever being a 'graduation ceremony.' No matter how many capacities they have built − these only very rarely lead to real role changes, with the locals taking over responsibilities previously held by international actors. This kind of role-changing does not even seem to be an objective of the 'capacity-building' − it is not something that donors hold international agencies accountable for. There is no reason why updating competencies cannot happen in a support- and reinforcing role, in an equitable partnership, other than the INGO wanting to justify still getting a full management fee/

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26 Local and national actors will not be able to benefit from on-line learning opportunities, and It-driven management systems, if donors (or intermediaries) do not provide them with the means to acquire computers, software, printers etc. These are often reduced or cut out from budgets.

ICR. As a senior staff member of an INGO acknowledged: *"As an INGO, we cannot be taken seriously if we have been partnering with a Bangladeshi CSO for many years, yet argue they still need capacity-building."* Does the capacity-narrative, controlled by international agencies, serve to maintain a power asymmetry? In the view of a senior staff member of an INGO.

> 66 *"Capacity is not the central issue. It is a modality of exclusion. It is politics."*
> (Senior staff member of an INGO)

Capacity convergence/capacity sharing: Not surprisingly, Bangladeshi CSOs vocally object to further 'capacity-building' or 'capacity development' with its connotations of 'haves' and 'have nots'. Alternative language proposed is 'capacity sharing' or 'capacity convergence'. A different language is a first step to a different mindset.

Bangladeshi experience and resources: Before bringing in more international experts for more 'capacity-building', Bangladeshi resources should be considered. Investing in Bangladeshi resource centres will rapidly turn out more costs-effective and hence greater value-for-money 'capacities.'

The text box shows the principles of the MJF. Other Bangladeshi CSO leaders interviewed stressed the importance of organisational capacity development being internally driven and -led.

Manusher Jonno Foundation – Core principles for capacity-development

- A large part of the capacity development activities should be initiated and managed internally by the NGOs
- The primary focus of capacity development is not the project rather the organisation itself
- NGOs are to take a pro-active role for their capacity development. MJF will match with the partner NGOs through responding to their needs
- MJF will employ its core competencies to the capacity development of the partner NGOs

Box 6. "Manusher Jonno Foundation" – http://www.manusherjonno.org/what-we-do/capacity-development/

Core Humanitarian Standard (CHS): Several international agencies have familiarised Bangladeshi CSOs with the Core Humanitarian Standard. There is at least one certified Cox's Bazar based CSO that has demonstrated it can meet quality standards that some international agencies still cannot. All acknowledge the value for an organisation to engage with the CHS (interview with senior staff of some CSOs), and some believe it should be mandatory. While desirable on the one hand[27], in practice this engagement could have unintended negative consequences. Indeed, the verification modalities are time consuming and, when it comes to 3rd party verification and certification, not only time consuming but also expensive (also in terms of indirect costs). Since 2016, only 109 organisations have completed at least one verification option. The number certified is far lower. Of the 112 who went through the process, 97 are international and 12 are national.[28] One needs to be careful not to push the CHS too much too fast, certainly among Bangladeshi CSOs that are financially fragile. *"Making the CHS standard mandatory would be a sure recipe for exclusion of most national and local agencies. Even well-resourced international ones struggle to meet it, how do you expect far less resourced national and local ones to achieve this?"* (senior staff of INGO).

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27 GMI staff has been directly and closely involved in helping to develop and apply the CHS, under the umbrella of the previous Humanitarian Accountability Partnership.
28 https://www.chsalliance.org/about/our-data/ (accessed on 6 December 2020)

The universal application of standards: Several Bangladeshi CSO leaders, aware of global realities, have identified inconsistencies in the superiority that international agencies claim, e.g. in terms of their ability to meet 'international standards': *"You cannot compare the situation of refugees in rich countries with that of refugees in a poor country. You are blaming us for not providing them for example with education, but are you making the same kind of noise regarding the situation of refugees in Greece? Do their living conditions meet your international standards?"* GMI has observed that indeed, international standards are definitely not met in some locations in Greece.

Action-learning and peer-learning: Training seems to remain the prevailing 'capacity-strengthening' modality, also in the draft Localisation Roadmap for Cox's Bazar. Several years ago, the Start Fund tried to introduce after-action-reviews but did not always (then) include 'implementing partners', local officials and/or affected communities. In other countries, e.g. Myanmar and Somalia, national and local actors want more space and support for peer-learning. So-called 'South-South' networking – somewhat popular a decade ago – seems to have disappeared from the spectrum of options. Peer learning works very well as it takes place among people and organisations with similar experiences.

HUCOCA: System-wide Capacities for Humanitarian Action. The HUCOCA framework is refreshing in many ways: it sees the fragmentation of the sector, driven by incentives that encourage competition rather than collaboration, as a problem (increasing the cost of coordination), focuses on collective capacities of different Bangladeshi institutions and organisations that work in complementarity, and presents a strategic vision in that regard. The 2016 and 2018 assessments have plenty to offer – here are some of their findings and recommendations:

- 2016 assessment: Programme management, DRR and resilience building, and networking and alliance building were identified as the most significant strengths of the CSOs. On the other hand, values and humanitarian mandates, risk management and institutional resilience, technical competencies, geographical outreach, standards' compliance, and accountability were identified as their greatest weaknesses. The most common leadership situation is -as so often – that of a long-time, male, leader (Oxfam 2016:11 – 12). Since there is a huge range of Bangladeshi CSOs, looking at nuances is necessary. Many CSOs get involved in disaster response ad hoc with few of them fully specialised in. Only some of them have regular budget resources exclusively for humanitarian work. Those with micro-credit schemes can use cash-at-hand for rapid responses, but this is seen as a vulnerability in case they cannot replenish the money from other sources later (idem:19).

The 2016 comprehensive study of national capacities for humanitarian crises recommends that INGOs advocate that donors open funds for accountable and competent local humanitarian NGOs and that donors rethink policies that restrict direct funding to local NGOs (idem: 22). The report ends with an outcome vision of what a humanitarian capacity building plan would lead to, not fragmented into bilateral interactions between organisations, but through a systems-approach (idem:22 – 24).

2018 assessment: Competition among agencies has increased and *"most INGO and international actors have all but abandoned their commitments towards localisation in order to secure a space in this large humanitarian response."* They are advised to share and account for their performance on their localisation duties and take corrective measures where needed. Overall, there is also a lack of strategic foresight about possible scenarios for Cox's Bazar (Oxfam 2018a: 60 – 63).[29] Bangladeshi CSOs are to develop a stronger humanitarian identity, combining their collaboration with the government with more independence when it comes to important rights-challenges. They are also encouraged to adopt more participatory and shared leadership styles, as that too strengthens their organisation's capacity (idem:62).

The 2018 assessment is critical of the multiplication of coordination structures, leading to a dual system in Bangladesh. HUCOCA advises the UN to adjust its working methods, in order to increase their cost-impact equation (idem: 65). Donors and INGOs – together with Bangladeshi CSOs – are asked to design their support so that it helps to build more autonomous and resilient CSOs rather than increasing their dependency and vulnerability. They should also avoid imposing their own monitoring, evaluation and accountability systems and be more enabling and supportive of those that emerge from networks and coalitions of Bangladeshi CSOs (idem:65). An outline of what a local humanitarian capacity support plan could look like, with specific objectives and indicators, is included in the assessment (idem:66–69).

5.4   COORDINATION

Bangladesh's complex coordination infrastructure shows certain parallels between that of the government and the international aid agencies' structures – at least for Cox's Bazar and the Rohingya/FDMN situation. A comprehensive assessment in 2018 found that government-international sector coordination worked fairly well at technical level but was weak in strategic terms (idem:21).

The Dpt. of Disaster Management within the Ministry of Disaster Management and Relief is a key coordination actor. Together with the UN, its Director co-chairs the Humanitarian Coordination Task Team (HCTT, established in 2012), which advises governmental decision making through the Policy Strategy Group. The decentralisation process in Bangladesh is advancing slowly. Deputy Commissioners at district level have gained some more authority to allocate in-kind resources and some discretionary funds but, overall, decision-making remains very centralised. A District Relief and Rehabilitation Officer is the link between the district and the sub-district (Upazila) administrations.

For the Rohingya/FDMN situation in Cox's Bazar district, operational coordination is in the hands of the Refugee, Relief and Repatriation Commissioner (RRRC) in tandem with the Deputy Commissioner's Office in Cox's Bazar. While formally reporting to the Ministry of Disaster Management and Relief, the RRRC gets its political steer from the Ministry of Foreign Affairs. This has created a somewhat dualistic system (Oxfam 2018a:22–25). Refugee camps are now managed by government-appointed 'Camp-in-Charge' (CiC), the official government representative with their leading authority role, under the RRRC. The NGO Affairs Bureau in Dhaka needs to approve all project proposals (except those under a UN umbrella), maintaining a tight governmental control this way.

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29 Scenarios were explored in GMI's 2018 evaluation of aspects of IOM's response, the report of which was not published (Van Brabant, Patel 2018).

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The international coordination structure for the Rohingya situation consists of the Inter-sector Coordination Group (ISCG) in Cox's Bazar and the Strategic Executive Group (SEG) in Dhaka. The latter is chaired by the UN Resident Coordinator, and co-chaired by UNHCR and IOM.[30]

In the first two years after the major refugee influx, the governmental and international coordination structures, certainly for Cox's Bazar district, were disconnected more than complementary. This showed itself, for example, in different camp zonings. Bangladeshi CSOs gravitated towards the Deputy Commissioner and the RRRC, while international relief agencies centred around the ISCG. Some tensions also existed among government entities, while rivalry between the UNHCR and IOM became quite common. The relationship between the INGO Forum and the CCNF is also complex. Overall, tensions have been reduced, however, since the early phase of the Rohingya crisis.

At Dhaka level, Bangladeshi CSOs are part of the HCTT and the SEG. At Cox's Bazar level, some Bangladeshi organisations currently co-chair certain clusters. Broadly speaking, however, presence and meaningful participation of national and local actors in the international coordination system for the operational coordination of the Rohingya response, has been and remains limited. The obstacles are always the same: English (spoken with different accents) as the working language, acronyms and internal sectoral references that make little sense to many local actors, so many meetings that only well-resourced agencies can afford to dedicate staff to them, a risk that capable local CSOs staff is talent-spotted at such meetings, and concerns about the costs of so many meetings. Moreover, the Head of Sub-Offices Forum in Cox's Bazar carries substantive decision-making clout, but national and local actors are not very influential in the main coordination set-up and absent from this Heads' Forum.

5.5   HUMANITARIAN PRINCIPLES

International relief agencies often claim that local and national actors generally find it harder to adhere to the principles of impartiality and neutrality. In Bangladesh, these issues surface most often around the Rohingya/FDMN situation, but also in the context with social marginalization, based e.g. on caste or religion, and conflict.

In early 2017, Patel observed that *"Most national civil society organisations see themselves not just as service deliverers but as part of the governance dynamics in their country. A connection to a political party is not an automatic indicator that the agency will not be willing or able to adhere to humanitarian principles. Political connections may actually be used to protect the integrity of the relief operation. The Bangladeshi NGOs also confirm that some of the INGO Start members, who have been in Bangladesh for decades, and are (largely) staffed by nationals, are not always totally 'outside of' the dynamics in their environment."* (Patel 2017:24). A similar observation was made by F. Almansa in the Oxfam HUCOCA assessment of 2016: *"Several INGOs have adapted to the environment created by the government, and most of them cooperate in a fluent way with the government with little critical constructive interaction."* (Oxfam 2016:19).

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30 For an up-to-date and comprehensive overview of coordination structures in Bangladesh, see Shahidur & Glorieux 2020.

HUMANITARIAN PRINCIPLES AND THE ROHINGYA/ FDMN SITUATION

One of the donors' and international relief actors' concerns about localizing more strongly in Cox's Bazar, centers on humanitarian principles and which attitude Bangladeshi CSOs would take, should their government proceed to repatriate Rohingya involuntarily and to unsafe conditions. GMI and also the ODI team had identified this very valid argument in early 2018 (GMI 2018; Wake & Bryant 2018:18). The question now applies to the relocation of as many as 100,000 Rohingya to the island of Bashan Char, some 40 km off the coast, a relocation that started in December 2020. There are concerns about their safety from cyclones and flooding, and access to adequate basic services. At the time of writing, UNHCR reportedly has not had access to the island, and international agencies are reflecting what position to take. At the same time, 22 NGOs, among them international and Bangladeshi ones, seem ready to become involved.

In this case, the issue is not the relevance of humanitarian principles but the 'us' and 'them' narrative of international agencies claiming a higher moral ground. They cast doubt on the willingness or ability of Bangladeshi CSOs to adhere to humanitarian principles. There are several nuances to consider:

There have been Rohingya refugees in Cox's Bazar since the 1970s. While always providing safe haven, the government of Bangladesh's position has always been that integration is not an option and that they need to return to Myanmar eventually. It restricted the number of agencies that were allowed to provide services, and at times reduced aid as a push factor on the refugees. In the late 70s, the mortality rate in the camps was four times higher than in the rest of Bangladesh. Large scale repatriations in 1978 and 1992 were neither voluntary nor to a safe situation. While acknowledging the real state of affairs internally, neither the UNHCR nor the 'international community' took a public stance at that time (Crisp 2018). Since about 2015, IOM has played a significant role in gradually opening the space for more assistance. IOM, however, was originally not set up as a UN agency, but as an organisation implementing on behalf of various states. Not until it became the UN Migration Agency in September 2016, did it become formally bound to the foundational rights' charters of the UN. However, transforming an organisation from a service-deliverer to a rights-based one does not happen overnight, and no matter which organization we pick, be it UNHCR or the IOM, it is clear that the international community never took a strong and principled stance to protect Rohingya rights over the past several decades, be it as 'refugees' or as 'forcibly displaced' people.

In 2018, the government signed a repatriation agreement with UNHCR and UNDP, which was not published. Some Rohingya in the camps were understandably critical about this.

International agencies have also not been effective in replacing the system of 'majhis' or group leaders in the camps, appointed by the Bangladeshi army during the influx in 2017. The plan was a more representative structure to speak on behalf of the Rohingya in the camps. The issue was under discussion in mid-2018 (without direct Rohingya involvement), but in the end no system of elected representatives came into being.

What has also not happened is that the international community has generously offered large numbers of Rohingya to resettle and make a better life in other countries. As a matter of fact, the Rohingya remain the largest stateless population in the world, now overwhelmingly finding itself confined to camps in Rakhine State and in Cox's Bazar.

Most INGOs are also toeing a careful line between making public statements about the rights of Rohingya to protection and avoiding being kicked out of Bangladesh. Several of them have had offices in the country for decades and have also established close working relationships with the government.

In recent years, some Bangladeshi CSOs, including those with strong bases in Cox's Bazar, have publicly communicated and campaigned on World Refugee Day, for understanding that the situation is not the Rohingya/FDMN's choice, and that their rights need to be respected.

At least one prominent Bangladeshi CSO, with experience on other chars, has been advising its government that it is taking a practical safety and a huge reputational risk. Its stance is that it will not get involved unless and until the UN finds the rights of Rohingya adequately protection on the island.

In short, both international agencies and national/local CSOs are facing practical dilemmas and have to make compromises. Portraying the situation in terms of 'the upright international agencies' and 'the irresolute Bangladeshi CSOs' is biased and not supported by facts.

5.6   WOMEN LEADERSHIP IN HUMANITARIAN RESPONSE AND LOCALISATION

The Grand Bargain has been criticised for not being gendered. Later in 2016, this led to the creation of the 'Friends of gender' group to support the various Grand Bargain work-streams. In the past few years, the role of women as humanitarian actors and not 'just' as victims, women's rights and women-led organisations have become a growing interest among international relief actors such as CARE, Actionaid, Oxfam and UN Women. While this is welcome, one should not automatically assume that male-led organisations cannot work effectively for women's rights, or that women always manage to avoid the shortcomings of male leaders. There is also a delicate balance between intense social engineering of a society by international actors, and an internally owned and driven change process.

Women in humanitarian response is not a new issue in Bangladesh. For example, already in 2012, the NARRI (National Alliance for Risk Reduction and Response Initiatives) commissioned NIRAPAD to produce a training curriculum on women leadership in disaster risk reduction (NARRI 2012). Recent research found growing verbal commitment to gender among local and national CSOs, and prioritisation of women in projects, though not yet gender parity (fair balance in numbers of men and women) of women in senior management and leadership positions (Oxfam 2018b:32).

In early 2020, Oxfam published a study exploring women's leadership in humanitarian action, covering Bangladesh and South Sudan (Jayasinghe et al 2020). This provides a comprehensive overview of important actors, with a short profile of each:

- The Ministry of Women and Children Affairs plays an important role in humanitarian action. It is a member of the Gender in Humanitarian Action Working Group (GiHA) that includes government, local, national and international organisations and seems to focus mostly on the Rohingya response.

- Bangladesh Women's Humanitarian Platform (BWHP) is a nationwide network established in 2017 that works to ensure that efficient humanitarian action addresses the needs of women, girls, and children in Bangladesh. It is one of the few women's entities involved in the localisation movement in Bangladesh.

- Voice of Women Humanitarian Organizations Network (VOWHON) is a network of women's organisations in the coastal belt based in Khulna. Its members are spread across six districts in southwest Bangladesh: Bagerhat, Gopalganj, Khulna, Jessore, Narail, Piro-jpur, and Satkhira. Sixteen women-led organizations are involved in the network. Their major activities include knowledge sharing, capacity building, and resource mobilisation. Most organizations are engaged in disaster risk reduction and safe programming activities in the region.

Individual women's organisations involved with humanitarian response, mentioned by Jayasinghe, are the Ashroy Foundation, Association of Voluntary Actions for Society, Chandradip Development Society and Sabalamby Unnayan Samity. Some of these are members of Bangladeshi CSO networks and forums.

Three factors seem to be contributing to the involvement of women's organisations in local humanitarian action being so minimal: harmful gender norms, funding challenges and their disconnection from the humanitarian system (idem:35).

A harder struggle for women organisations: As in other countries, also the women-focused and women-led organisations in Bangladesh find it harder to access funding. *"There is no system to track how much money has been received by women's organizations. In an FGD, a woman leader from a local humanitarian organization said, 'Both the volume of resources and visibility are critical for survival. Our work was valued by the development partners. But at the end of the day, our interventions are not as visible as we do not have adequate resources and people capable of marketing our achievements. As we need to depend on low-paid staff, we cannot afford such expensive people.' They lack financial resources to continue their initiatives. In an FGD, a woman staff member from a local humanitarian organization said, 'We face serious resource constraints because of such a competitive environment' for funding. Additionally, the research showed that most of the women-led organisations involved in humanitarian action are smaller than NGOs led by men, making it challenging for them to compete for funds against these larger organizations."* (Jayasinghe et al 2020:36).

An issue that came up in this inquiry is whether a form of affirmative action is required for women's rights/women-led organisations. One the one hand, they want to be treated equally, on the other hand they may recognise they are currently not in a position to compete with the often stronger, general/male-led organisations. As the playing field is not yet level, a call-for-proposals only for women-led organisations, may be appropriate.

> ❝ *"In every call for proposals, you see a line that says women-led organisations are encouraged to apply. But we do not get a real space and opportunity. We cannot now compete on an equal level. If you really want to work with women-led organisations, you need to give them some extra space. They are not present everywhere and have not always been able to gain the same structured and formalised experience. You cannot use the same assessment as for other organisations that often have had longer support already. All the more so when it comes to a local/grassroots level rather than national women-led organisations."*
> (Director of women-led organisation)

This reality was confirmed by the director of an INGO commenting on the internal organisational efforts required:

> ❝ *"It took me 1.5 years of lobbying and convincing many colleagues in my organisation to get funding for a women's rights organisation in the Rohingya response. I can't invest so much time again and again for other local organisations."*
> (Director of an INGO)

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The female director of another Bangladeshi CSO recounts a similar experience that raises the question whether the international relief agencies have become more rather than less exclusionary:

> *"We were still a small community-oriented organisation during Cyclone Sidr in 2007. But a visitor came from the Swiss Development Cooperation to the Swiss Embassy in Dhaka, listened to the affected communities and saw what we were doing. We then had a long conversation. S/he asked me to provide a concept note, which we did. Three days later we got a message they want to work with us and fund us directly. That turned into a collaboration with direct funding, which covered 14 projects over 10 years, through several other cyclones. The direct funding meant that the costs of intermediaries was saved and could go straight to the communities. Since 2007, we have greatly developed our capacity and have received funding also from others such as Oxfam USA, Cordaid, Concern Worldwide, and UN agencies like the FAO. In emergency situations, we can now mobilise up to 1,600 volunteers, many of them women. We also do research and for example running a multi-year research project with a Bangladeshi university on climate change impacts. When Cyclone Amphan hit Bangladesh in May 2020, we approached an international agency that we had been talking with already for some time, and rapidly presented a concept note. But we got a message they were not going to fund us. They decided to fund a male-led organisation. When we asked why, they said 'You do not have the necessary capacities'. We challenged that and provided further evidence of our track record. After a few days, the contact person in that agency called us and said 'We will work with you then in the next emergency'."*
> (Director Bangladeshi CSO)

Not having the same financial resources as others, including several male-led Bangladeshi organisations, makes it difficult for these women-led organisations to have their voice heard. They also have a harder time to profile themselves by being present in national, let alone international conferences and policy- and practice forums.

> *"Our voice cannot reach the international humanitarian platforms."*
> (Female CSO staff)

This situation may become easier now that the COVID-19 pandemic has made more meetings happen through tele-conferencing. The emergence of the abovementioned networks of women-led organisations may also help them to obtain a stronger presence and influence.

> *"We have capacity, but do not undermine our capacity."*
> (Female CSO staff)

One female interviewee recommended that research be conducted into determining what amounts and percentages of funding have gone to Bangladeshi women-led organisations in the past three years and how much capacity-investment they have received.

Some women from Bangladeshi CSOs took part in the Asia-Pacific Regional Workshop, in August 2019, organised by the GBV Localisation Task Team of CARE, Actionaid and UNFPA. Although this project provided some focus over its 1.5 years effective period, it was not continued. Gender based violence has increased globally during the COVID-19 pandemic, also in Bangladesh.

Related to the Rohingya crisis, several women's organizations work in Cox's Bazar in addition to their work outside of the camps, such as Ain o Salish Kendra, Agrajattra, Aparajeyo Bangladesh, Jago Nari Unnayn Sangsta (JNUS) and the Bangladesh National Women Lawyers' Association. Also Rohingya women have organised in the camps to advocate for their rights and/or provide support for refugee women. Among them Shanti Mohila and the Rohingya Women's Welfare Society (Jayasinge et al 2020:33 – 34). JNUS, for example, a community-based and women-headed organisation, has provided relief to Rohingya since 2012. But it has also been conducting research, e.g. on refugee-host population relations since 2013 and in 2018, on the relations between international and local organisations (Banik 2018).

By early 2020, women's organisations find themselves only marginally involved in the sectors' system of the Rohingya response. *"For example, no local women's organizations are part of the gender-based violence sub-cluster, and if they are, they do not seem to receive large amounts of funding, though confirmation is not possible as disaggregated data on funding are not yet available. Additionally, no local or national women's organization appears to be an active member of the GiHA WG, which, as mentioned, is working to mainstream gender in the Rohingya response. The group has, however, made a commitment to "include local women's rights organizations and networks and local gender equality actors."* (Jayasinghe et al 2020:32-33).

"Most of the work done by women's organizations in the Rohingya response tends to focus on service delivery rather than strategic gender justice programming. Such gender-based programming, however, is much needed. For example, women's organizations such as Rohingya Women Welfare Society and Aparajeyo Bangladesh provide gender-based violence services to Rohingya communities, but because gender-based violence programming is not seen as a life-saving intervention, this work does not receive the funds and attention it requires." (idem).

Equal gender participation however is also controversial among the influencers in the Rohingya community: *"The community prefers gender segregation in nearly all of its political, social and humanitarian affairs. Deeply patriarchal cultural norms leave few outlets for women to organise. RWEAN and Shanti Mohila both formed to create a parallel space for women's participation and self-organising. A recent crackdown on women's participation as NGO volunteers underscores the pressures that women face, and the lack of support for open-mindedness around gender issues. In December 2018, a video was circulated widely amongst refugees that showed a group of young men and women volunteers working for the Swiss INGO Terre des Hommes. The volunteers were standing in a circle inside a camp office and dancing while clapping their hands to Bengali music. The video caused a scandal and fuelled existing fears that women volunteers were at risk of exploitation by NGOs. Rumours circulated widely that girls had been trafficked by Bangladeshi NGO staff, though these appear to be unsubstantiated. A consensus seemed to emerge that NGOs were promoting un-Islamic behaviour in violation of Rohingya cultural traditions. (…) Many refugee men and women do see women's participation in the workforce positively, however. They realise that it can increase status and income for families. Rohingya women have commented on how they felt amazed to see so many Bangladeshi women – their cultural cousins – working for NGOs and began to understand that they too could get jobs. Many more Rohingya women are now working outside the home than before, and the backlash could be a sign that the community is stretched to the limits of its adaptability. Those who have been pressured to quit their jobs felt disappointed but helpless."* (Olney 2019:26 – 27).

5

There is a high incidence of gender-based violence in the Rohingya camps, which seems to be taking place mostly among the Rohingya themselves. Yet for a long time, aid agencies focused on case management, without strategically involving respected individuals and influencers within the Rohingya community, to lead community discussions on values and norms of behaviour. Survivor support is very important, but prevention must not be neglected. Understandably, the priorities in 2017 – 2018 focused on life-saving delivery of goods and services. But as of mid-2018 onwards, the situation was sufficiently stabilised to also expand into community-development type of approaches, enabling a long-persecuted community to restore itself somewhat.

Jayasinghe recommends that women's organisations are invited to engage more in Bangladeshi CSO networks such as the CCNF, NAHAB, and NIRAPAD. Women networks present another opportunity for more meaningful participation. *"The activities of women's organisations (including women-led organizations) that are currently conducting disaster risk reduction, preparedness, and Rohingya response programming also need to be uplifted, as there is a perception that women's organizations are solely development organisations."* (Jayasinghe et al 2020:37).

STATE OF LOCALISATION, OBSTACLES AND ENABLING FACTORS

The idea of localisation has been on the agenda of Bangladeshi CSOs already well before the World Humanitarian Summit. Today, it is also on the agenda of the international relief actors, but only after persistent lobbying, advocacy and public campaigning. For many of the international agencies who have formally signed up to the Grand Bargain, it is still not an institutionalised commitment, and the personal views of key people at country level (and at headquarters level) determine the organisational practices. Outside the Rohingya/FDMN situation in Cox's Bazar, some meaningful developments have taken shape in 2020, in a spirit of localisation by design. Around the Rohingya/FDMN situation, the issue has been raised since late 2017 and early 2018, and by the Workstream on Localisation mission in September 2018. More than two years later, modest changes are visible. The 2020 Joint Response Plan, for example, has 117 partners: 48 INGOs, 61 Bangladeshi CSOs, and 8 UN agencies. 53 of the 117 are considered 'appealing organisations' and 64 'implementing partners'. Among the 'appealing partners', there is a 9% increase in national CSOs, compared to the JRP of 2019 (JRP 2020, footnote 15). Overall however, this seems more the result of localisation by default than by design. A 'Localisation Roadmap', which should provide a framework for localisation by design, remains stuck in a prolonged process of reviews and comments. How do we move forward now? Here is some of what interviewees said about obstacles and enablers:

6.1   OBSTACLES

Both Bangladeshi and international interviewees pointed at mindsets and interests.

Mindsets, attitudes and behaviours:

> **"The biggest obstacle is the people in the sector – their way of thinking is all about controlling. We need a different kind of leadership in INGOs and in the UN."**
>
> **"Mindsets should be changed first."**
>
> **"When you design or do anything solely from the concern whether you are legally, politically, reputationally etc. protected, your approach is so self-centred, that you cannot achieve a good outcome. I think donors know very well what needs to change, but I do not think they will change."**
>
> **"It all depends on the mindsets of people, particularly in the international agencies. We need to change our lenses, how we look at things. But we also need to look at the mindsets of local agencies. They need to know their strengths and weaknesses, but often they underestimate their capabilities, how important their understanding of the context is, their connections, and their dedication."**
> (Senior staff of two INGOs and 2 local NGO/CSO)
>
> **"International agencies are unable to see how they act with double standards. The Core Humanitarian Standard, with all its rightful emphasis on accountability, does not address that blind spot."**
> (Senior staff international agency)

6

Individual and organisational interests:

> "Capacity is not the issue. Commitment disappears in the practical reality of financial resources. International agencies are running after the money and they compete with Bangladeshi CSOs."

> "INGOs very diplomatically pass the liability to the local organisations. They really do not nurture accountability at their own level. What they have paid attention to is to design their procedures so that they ensure an outcome that still protects them."

> "It is also a conflict of interest for national staff of international agencies. These could disown their own country if that is in their personal interest. If we shift from implementing to supporting and reinforcing, and being an enabler and catalyst, we need fewer staff and staff with different skills."

> "Some of the international organisations with a Bangladeshi country director are the most insistent on direct implementation."

(All quotes from senior staff from international agencies)

6.2   ENABLING FACTORS

Both Bangladeshi and international interviewees pointed out the need to change the tone of the conversation but also for international organisations to institutionalise their commitments. These cannot be left to the discretion of senior managers in country, and/or their humanitarian advisors.

> "Highlight more the positive examples from the longer past and recent years. There are many good experiences in Bangladesh beyond the Rohingya/Cox's Bazar context."

> "We need more institutionalised commitment to localisation. Now it is still very dependent on the interest and attitude of individuals."

> "Change the tone and nature of the conversation in Cox's Bazar."

> "We cannot start a constructive conversation from a divide. We need to focus first on our shared purpose and capacity convergence. After having established that common ground, we can have our hard talk."

(Senior staff from international and national agencies)

MOVING FORWARD

Game changer 1: The key game changers are the international donors and their humanitarian advisors.[31] Some factors still shaping their behaviour regarding humanitarian aid too much are: short-termism, fear of fraud and corruption, political attention in their home countries, overall aid budgets, and their need for fund managers. They need these as they cannot handle a multitude of contracts with their own staff. Bangladeshi CSOs can be more propositional on this, showing how they can and will handle these concerns as well as international agencies, not just claiming against Grand Bargain and other commitments. They could change the value-for-money argument by showing in a more detailed manner how the high costs of the past three years are simply not sustainable, and how they would operate at lower costs offering a fairly equivalent effectiveness. If international agencies are not transparent about their costs, Bangladeshi CSOs could draw e.g. on the research experience at Bangladesh universities to do some focused analysis of comparative costs. They do need to clarify their potential positioning should their government act on the Rohingya/FDMN in a manner that disregards their fundamental rights.

Game changer 2: The Government of Bangladesh is a second key actor that can change the game, acknowledging that it may want to keep a balance between internationalisation and localisation, as it wants to keep the Rohingya refugees a matter of international concern. A clearer vision of what 'success' or perhaps 'significant progress' would look like, say in the next 3-5 years, may help. Reportedly some parliamentarians and government officials are beginning to ask the question of how governmental and non-governmental institutions could benefit more from the existing international assistance. There is an interest to look at regional experiences. It has been suggested that also the NGO Affairs Bureau give this more focused consideration.

Game changer 3: A third potential game changer is the institutionalisation of localisation commitments made within international aid agencies. UN and INGOs alike have signed up to one or the other reference framework. Other issues such as child protection, zero tolerance for fraud, PSEAH, or gender equity are not at the discretion of the senior managers and -advisors at country level either, so why should localisation be? Organisations unable or unwilling to commit, should withdraw their formal endorsements from the frameworks.

For 'the rest of Bangladesh', there are thoughts about how the HAG framework could be complemented and that it will be inevitable to have some difficult conversations about INGO nationalisation. For the Cox's Bazar situation, the key blockage is the tense atmosphere. While that will not change easily, some space for conversations could be created for a sustained and constructive dialogue of the willing. Both international and Bangladeshi agencies will need to practice listening with more empathy to each other, only that way will they be able to form equitable relationships. Nurturing new and different dynamics will eventually begin to influence the prevailing ones. Last, but not least, all need to engage extensively with both Rohingya and host populations. Everyone has to work with them in a way that goes beyond 'problems' and 'complaints', finding those improvements that are achievable under constraining circumstances.

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31 Earlier GMI research in Bangladesh has also identified the influence of 'humanitarian advisors' in UN agencies and INGOs but also at donor agencies. Some humanitarian advisors were found to be fully up to date on the Grand Bargain and taking it as a serious policy- and practice commitment for their agency. For others, the World Humanitarian Summit seemed never to have happened, the Grand Bargain being an irrelevant reference.

For the ToGETHER consortium and the potential choice of more Bangladeshi partners, one should choose organisations that are 'home-grown' and not linked to any international alliances, federations or the like. They should be rights-based rather than just service-deliverers, should take responsibility for their own organisational development and strive to reduce their dependence on international aid by increasing their domestic resource base. They also need to address the question of principles – particularly in the face of minority but also refugee rights – proactively.

At the broader strategic level, ToGETHER can help Bangladeshi CSOs strengthen the evidence-base of their advocacy, but also become more propositional towards international actors by putting well-thought through, concrete proposals and options on the table, if international agencies are not doing so, or do not come up with anything serious. They can explore complementarities and synergies with relevant initiatives such as the Start Hub Bangladesh, Oxfam and some other committed C4C signatory INGOs. ToGETHER can promote the various existing frameworks and their application. It can also explore whether it can create or support spaces for constructive dialogue with a coalition of the willing, always aware that its member INGOs also have interests.

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