Background
The humanitarian sector has faced an overwhelming series of challenges in the twenty-first century. While the nature of these crises has shifted, and the number of people in need has grown, the sector has not managed to keep up with these changes. More and more people affected by conflict and disaster are unreached or underserved by the humanitarian sector. It has also become clear that, in a crisis, affected populations rely on many sources beyond the formal humanitarian system for assistance.\(^1\)

Over the last five years of signing of the Grand Bargain commitments a lot of investment has been made in research by international actors and donors into blockages and bottle necks in delivery of effective and efficient humanitarian response. More specifically many research studies on localisation have surfaced many issues and bottlenecks\(^2\). It has led to the Grand Bargain localisation workstream developing specific guidance on how to ensure more equitable partnership\(^3\) and how the intermediaries can improve their performance and work in complementarity to the local actors\(^4\), demonstrating the commitment to reinforce not replace and to ensure better and more quality funding to local responders, which ultimately would ensure effective, timely, relevant and appropriate response to the affected populations in whose name funds have been raised to show solidarity. In many reports over the last six years, gaps have been identified in intermediary performance, the latest report in December 2021 “Localisation: A “Landscape” report” to USAID from Tufts, Feinstein International Center.\(^5\) The particular role of intermediaries has been highlighted in “Bridging the Intention to Action Gap: the future role of intermediaries in supporting locally led humanitarian action, June 2021\(^6\), commissioned by GB Localisation workstream.

KEY FINDINGS:
The existing role of intermediaries needs to fundamentally shift to better support locally led action.

a. The balance of direct implementation and intermediary roles for organisations not local to context needs to shift. The existing balance is not considered to be appropriate or fit for purpose, and international organisations in many contexts continue to inappropriately default to direct implementation.

b. The role of the intermediary, when requested or required, needs to be more appropriate and accountable. Even when international organisations act as intermediaries, many local and national organisations do not receive the support they request or believe they need to maximise their effective contribution to the humanitarian system.

---


\(^2\) [https://reliefweb.int/sites/reliefweb.int/files/resources/Localisation-In-Practice-Full-Report-v4.pdf](https://reliefweb.int/sites/reliefweb.int/files/resources/Localisation-In-Practice-Full-Report-v4.pdf)

\(^3\) [https://interagencystandingcommittee.org/system/files/2020-05/Guidance%20note%20on%20partnership%20practices%20May%202020.pdf](https://interagencystandingcommittee.org/system/files/2020-05/Guidance%20note%20on%20partnership%20practices%20May%202020.pdf)


Barriers preventing change are currently far more powerful than the triggers that will motivate change. Change is required in three key areas to achieve a more effective future role for intermediaries. Concrete changes are required in the motivation for change; the opportunity for intermediaries to make easy choices that will effectively support change; and the deployment of capabilities that are adapted according to actor and context to ensure a fit-for-purpose contribution.

The intermediary caucus

The Grand Bargain V2.0 framework, while proposing the need of caucuses clearly states the following:

One of the recommendations for the Grand Bargain V2.0 framework is, “...coming from all constituencies and workstreams, is the need to elevate discussions and decision-making to a more political, strategic level. The Facilitation Group has therefore developed a proposal around “caucuses”, which involves relevant and concerned Signatories - “coalitions of the willing” - that agree to monitor, drive and encourage progress on specific commitments at the Political level.

What we understand from different documents, “A caucus is meant to unblock a political bottleneck at an elevated level”. Given the above, we truly expect the caucus to be bold in diagnosing the problems and prescribing the recommendations accordingly. To us the current draft largely looks to be written from the International perspective with reference to International frameworks. We would like to recommend that the draft should reflect the Southern perspective equally. We would like to make following recommendations for your consideration:

Wider context: There seems to be excessive focus on context facing protracted crises and where the UN system is strong. However, any reform process must acknowledge that humanitarian actions happen in a lot more contexts too, where power imbalance equally prevails. Therefore, a reform process should apply universally acknowledging the role of UN and non-UN actors.

Reinforce, do not Replace: In spite of it being part of the language of the Grand Bargain and one of the commitments in Agenda for Humanity, we haven’t seen much political commitments and action among the intermediaries. They continue replacing local actors in the contexts where they see more possibility of fundraising. This practice has seriously undermined full realisation of intellectual capacity of local actors as they are often used as sub-contractor or cheap implementors of the programme designed by intermediaries. Civil society movement evolves from local realities and it is important for them to retain the intellectual capacity for bringing about transformative change in their own societies. The current neo-colonial mode of operating is doing serious harm to that process. The role of intermediaries need to be adapted so that the local CSOs remain independent while benefitting from complementarity from international actors. A partnership model should ensure synergy instead of at the cost of local actors and entrenching power of international actors are country level.

A clear definition of intermediaries: Even in the sixth year of the GB, we still do not have a clear definition of intermediaries and local/national actors largely because of the vested interest of intermediaries, which we witnessed right from the Localisation Marker Working Group (LMWG) process. It is important for the caucus to define who the intermediaries are. The country offices of global INGOs must be considered part of their global confederation, instead of using the flawed IASC

---

7 PS-6.
8 Ibid
Definition to qualify their country offices as local or national. This is the bold political stance we expect from the caucus. **We need to address the political barriers instead of trying to be politically correct and safeguarding interests of the most powerful and influential actors.** Intermediaries can be national or international organisations.

**Equal partnership:** As stated earlier, the local intellectual capacity has been eroding because of the flawed partnership pattern. We understand the limitations of donors of not being able to work through multiple partnerships, hence the need of intermediaries. However, that must not mean systematic marginalisation, subordination and exploitation of local actors. To address this challenge, the caucus must emphasize upon tripartite partnership between donor, intermediaries, and local actors. ECHO presents a good example of that. A tripartite partnership will bring in transparency, visibility and acknowledgement of the role of local actors and will also provide much-needed institutional strengthening to them. A tripartite partnership will also clearly define the unique and complementary roles being played by intermediaries and local actors.

**Humanitarian actors are for a change, not only for distribution of goods:** Humanitarian actions can’t be episodic. This has been recognised in the GB commitment to triple nexus approach. While defining the role of intermediaries, a nexus approach, unearmarked and multi-year funding should also be recommended so that local actors could embark upon a transformative process instead of just addressing immediate humanitarian needs. We must acknowledge that disasters are manifestations of complex underlying factors which need long-term and systematic programme for durable solutions.

**Institutional strengthening:** Local organisations continue being unsustainable as they still don’t get adequate operational cost, overhead and long-term funding. One of the indicators for intermediaries must be the institution building support they have provided to their local partners. Donors must include it as one of the key criteria while finalising partnership with intermediaries.

**Safe space:** Given the power imbalance, local actors still don’t dare to speak up if they are into an exploitative partnership. They fear losing funds if challenge intermediaries. Given that, a safe space must be created for local actors to speak up confidently. Perhaps the caucus could consider appointing a Humanitarian Ombudsman to provide that confidence to local actors.

We recommend that an Intermediary Code of Conduct should be established with following themes to encourage behaviour change and add value to the partnership and which delivers best outcomes for the communities affected by crisis. A score card can be established to increase accountability and measure progress.

1. Developing clear and transparent partnership selection criteria and a Tripartite Partnership agreements that includes roles and responsibilities of all parties, risks are shared, and mitigation measures are mutually agreed, including to ensure safeguarding is addressed.
2. Ensuring project budgets include funds for local partners, relevant to the context and needs, including: 1) overheads including set-up costs; 2) indirect costs (as % of project budget); 3) assets vital for project implementation, safety and/or organisational financial sustainability;
3. Intermediaries analysing and addressing internal bureaucratic and capacity issues, leading to reduced bureaucratic burden for partners, as much as possible, while maintaining minimum requirements and accountability. Contextualisation, simplification and flexibility need to be the key guiding criteria.

---

9 Positioning Paper on Localisation and Intermediary role by Myanmar Civil Society, January 2022
4. Establishing a of common portal for due diligence requirement of local actors to lessen the burden of submitting to different requirements of different agencies.
5. Clearly allocating institutional strengthening in core funding allocations where possible.
6. Identifying clear outcome of capacity strengthening and role change and agreed between partners
7. Demonstrating transparency by fully sharing financial information on budgets and donors with partners and reporting financial information in the IATI on how much is provided to the partners, including breakdowns and develop a national level dashboard for improving transparency and accountability.
8. Building into the agreement a feedback mechanism between the intermediary and local partners to inform decisions for continuing improvement of partnership practice. Feedback channel to the back donor is provided in the agreement that can be used as needs arise.
9. Intermediary and local partners to ensuring accountability to the affected population by inclusion in the partnership agreement provision of access of recipient of aid to a safe feedback mechanism that has channel to back donors.
10. Jointly deciding and clearly communicating the nature of the relationship and the work being carried out.

We suggest that the Code could be piloted in a few countries where country level localisation dialogue has taken place. Philippines is the latest country to be hit by Typhoon Rai. Review after six months or a Real Time Evaluation could document progress and learning from implementing the code can be integrated further.

Lastly, we would expect the caucus to suggest for revolutionary actions by the intermediaries in addressing the barriers in strengthening the local response mechanism, which are currently denying a just and efficient response to the affected population. Feedback from local actors and recipient of aid should be given value by donors. Endorsements or preferred intermediary by local actors be considered an incentive to intermediaries that may have demonstrated good partnership practice. We have witnessed several reform processes ending by scantily influencing the humanitarian architecture. In the sixth year of the GB, we must show determination to bring about the much-awaited change. We exist for the people who are in dire need of humanitarian assistance, who are desperate for a normal life like us. They should be central to our policies and practice. Any attempt to be politically correct would not help us to achieve what we want to.