

REPORT

JULY 2023

# LOCALLY-LED RESPONSES TO CASH AND VOUCHER ASSISTANCE IN THE MIDDLE EAST AND NORTH AFRICA

**BARRIERS,  
PROGRESS AND  
OPPORTUNITIES**



ACTION AGAINST HUNGER UK'S  
MONITORING, EVALUATION AND LEARNING SERVICES  
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## SUMMARY TABLE

<b>Intervention title</b>	Locally-led Responses in the Middle East and North Africa – Progress, enabling factors and barriers
<b>Location</b>	Middle East and North Africa in the following countries: Iraq, Jordan, Lebanon, occupied Palestinian territories (oPt), Syria, Türkiye and Yemen
<b>Donor Contribution</b>	German Federal Foreign Office (GFFO)
<b>Leading partner</b>	CALP Network
<b>Evaluators</b>	Action Against Hunger UK’s Monitoring, Evaluation, Accountability and Learning Services
<b>Type of exercise</b>	Consultative research study
<b>Exercise timeframe</b>	January 2023 – March 2023

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# ACRONYMS

<b>AAH</b>	Action Against Hunger	<b>KII</b>	Key informant interview
<b>AHC</b>	Ankawa Humanitarian Committee	<b>LLR CoP</b>	Locally-led Responses Community of Practice
<b>CARMA</b>	Cash Assistance in Re-Emerging Markets	<b>MEAL</b>	Monitoring, Evaluation, Accountability and Learning
<b>CBFP</b>	Country-based pooled funds	<b>MENA</b>	Middle East and North Africa
<b>CIDA</b>	Canada International Development Agency	<b>MPCA</b>	Multi-Purpose Cash Assistance
<b>CRS</b>	Catholic Relief Services	<b>NAF</b>	National Aid Fund
<b>CSN</b>	Civil Society Now	<b>NEAR</b>	Network for Empowered Aid Response
<b>CSO</b>	Civil society organisation	<b>NGO</b>	Non-governmental organisation
<b>CVA</b>	Cash and voucher assistance	<b>oPt</b>	occupied Palestinian territories
<b>CWG</b>	Cash Working Group	<b>PIN</b>	People in Need
<b>DRC</b>	Danish Refugee Council	<b>RCRC</b>	Red Cross Red Crescent
<b>ECHO</b>	Directorate-General for European Civil Protection & Humanitarian Aid Operations	<b>SCHF</b>	Syrian Cross border Humanitarian Fund
<b>ESSN</b>	Emergency Social Safety Net	<b>SoWC</b>	State of the World's Cash
<b>FCDO</b>	The UK's Foreign, Commonwealth Development Office	<b>TRC</b>	Turkish Red Crescent
<b>FSP</b>	Financial service provider	<b>UK</b>	United Kingdom
<b>GFFO</b>	German Federal Foreign Office	<b>UNHCR</b>	United Nations High Commissioner for Refugees
<b>GoS</b>	Government of Syria	<b>UNRWA</b>	United Nations Relief and Works Agency for Palestine Refugees in the Near East
<b>HCT</b>	Humanitarian Country Team	<b>WFP</b>	World Food Programme
<b>IFRC</b>	International Federation of Red Cross and Red Crescent Societies	<b>YHF</b>	Yemen Humanitarian Fund
<b>INGO</b>	International non-governmental organisation		

# EXECUTIVE SUMMARY

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While the Grand Bargain 2016 indicated an international commitment to locally-led response in humanitarian aid, advancements towards localisation, in both policy and action has been slow. With attention to locally-led cash and voucher assistance (CVA), this research aims to understand the barriers, progress, and opportunities to locally-led CVA in the Middle East and North Africa (MENA) region.

This qualitative research study used secondary data sources including 28 key policies and literature documents, together with primary data collected through 35 key informant interviews (KIIs). Respondents represented organisations in Iraq, Jordan, Lebanon, occupied Palestinian territories (oPt), Syria, Türkiye and Yemen. Data were analysed using an analytical framework based on the *Power Cube* (Gaventa, 2019) to evaluate the emerging power dynamics within locally-led responses using CVA in MENA.

Findings reflect current regional policy commitments with attention to the existing global policy and investigations on locally-led response. The research highlights tension between the reported commitment of the humanitarian sector towards localisation and the actual steps implemented to advance locally-led CVA. Subsequently, recommendations emphasise the sector's responsibilities in order to expand locally-led approaches in an inclusive and practical way.

## DEFINING LOCALLY-LED CVA AND THE ROLES OF DIFFERENT STAKEHOLDERS

There was no agreed definition of “locally-led” cash and voucher assistance (CVA). Most respondents agreed that localisation implies that local actors, either government or local NGOs, should become responsible for the design, implementation, management or coordination of cash or voucher programmes. However, from the perspective of international actors and relevant policy documents, the international community was often still characterised as more knowledgeable with leading responsibilities. In contrast, local actors were less likely to be perceived or described with these attributes. Perceived differences in expertise and responsibilities of international actors versus local actors have become internalised to perpetuate existing structural hierarchies within CVA and more broadly humanitarian aid.

## POLICY COMMITMENTS AND ACTIONABLE STEPS TOWARDS LOCALLY-LED CVA IN MENA

Globally, strategies such as the United Nations High Commissioner for Refugees (UNHCR) Policy on Cash Based Interventions 2022—2026 (UNHCR, 2022) and the New Cash Coordination Model (IASC, 2022) emphasise the need to centralise local NGOs and governments within cash-based programming. However, in MENA, many international respondents reported that their organisations did not have specific policy guidance for locally-led responses. Overall, local actors remain sceptical that any policies are prioritising local leadership in practical implementation of CVA. One local NGO in Iraq suggested current policy commitments remain “ad-hoc and context driven”.

When asked about specific actionable steps in locally-led response, many international actors from international non-governmental organisations (INGOs) and UN agencies suggested progress was made

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through capacity building of local non-governmental organisations (NGOs). However, this approach undermines local stakeholders' existing technical and contextual knowledge, while minimally investing in local systems strengthening demanded by both local NGOs and the international community. Other steps, such as aligning international CVA to social protection systems, improving inclusivity of local actors in coordination and cash working groups (CWGs) and opening direct funding opportunities for local NGOs, Someone from the Directorate-General remain limited. for European Civil Protection and Humanitarian Aid Operations (ECHO) states that their organisation is only at the "very beginning of a much more systematic approach", and Metcalfe-Hough et al. (2021) report only 1.7% of global budget was allocated to local organisations in 2021.

## CURRENT BEST PRACTICES

According to stakeholders, best practices of locally-led CVA occur when CVA approaches are connected to government-led social protection systems and when local NGOs claim leadership responsibilities during a CVA project while receiving technical support from the international community. More specifically, financial institutions and consortia members recognised Estidama++ in Jordan as a productive measure to bridge a humanitarian and development approach to CVA. In Iraq and Syria, international organisations have supported the capacity and systems development of Ankawa Humanitarian Committee (AHC) and that of local actors in the Cash Assistance in Re-Emerging Markets (CARMA).

## KEY BARRIERS TRANSLATING POLICY INTO OPERATIONS

Stakeholders identified a series of practical and ideological barriers to the implementation of policy commitments to locally-led CVA. On the surface, the funding ecosystem and the international humanitarian system's existing structure are associated with the practical barriers. Local actors struggle to establish the required systems and operational procedures necessary to comply with international standards of accountability, global data protection regulations (GDPR) and transparency.

The root causes of these problems reveal hidden and invisible power dynamics that prevent the growth of local actors into leadership responsibilities. International perceptions of corruption and the politicisation of local actors in MENA fuel the hesitancy to fund and partner with local NGOs and governments. While in some instances these issues may be valid, local actors felt the international community often held mistrust and scepticism of local actors regardless of the context and evidence. One stated, "donors are afraid to take that leap of faith and put that trust in us". Further, the continued concentration on the capacity building of individual professionals fails to recognise the experience of local NGOs.

## ENABLING FACTORS AND POTENTIAL OPPORTUNITIES

Emergency responses such as the earthquake in Türkiye and Syria demonstrate how trust between governments, local actors and the international community enable locally-led responses to succeed. Government and donor policies requiring a locally-led approach increase the prioritisation of localisation as demonstrated by a UK Foreign, Commonwealth and Development Office (FCDO) project cited by a Danish Refugee Council (DRC) informant.

Other international respondents suggested that digitalisation, and continued linkages between social protection mechanisms were seen as opportunities to improve locally-led CVA.



## RECOMMENDATIONS

- 01** International actors need to create public action plans to institutionalise and operationalise localisation policies with specific attention to CVA. These commitments need to identify indicators and measures of success that hold international organisations accountable to their commitments. These plans should elevate learning from existing locally-led mechanisms.
- 02** Inter-organisational bodies, such as coordination groups, consortia and CWGs, must adopt inclusive operational guidelines to create space and leadership of local organisations.
- 03** Coordination and CWGs should hold learning workshops to elevate the success of existing locally-led mechanisms, including those established during the onset of emergencies, to continue through early recovery and development approaches.
- 04** International organisations must demand and collectively advocate that financial institutions facilitate more collaborative models and increase access to appropriate funding for local actors.
- 05** The international community – led by local actors’ demands and needs – must financially invest in local systems strengthening processes. This would include facilitating locally-led capacity assessments to identify the local agencies’ strengths, and identify where international technical support can add value.
- 06** International actors must challenge existing unconscious bias within their organisations and the humanitarian system through equitable partnership guidance, inclusive hiring and anti-racism policies.
- 07** Donors must redesign their risk frameworks and internal processes to create flexible and fair funding streams accessible to local actors.
- 08** Donors, funding institutions and consortia should require INGOs to include localisation strategies and local leadership within their project proposals.
- 09** Local actors should claim their own coordination spaces through the membership with collectives such as NEAR, or by establishing nationally-led inter-organisational bodies.
- 10** National governments should create regulations and policies that require international actors to create equal partnerships centred on local leadership.

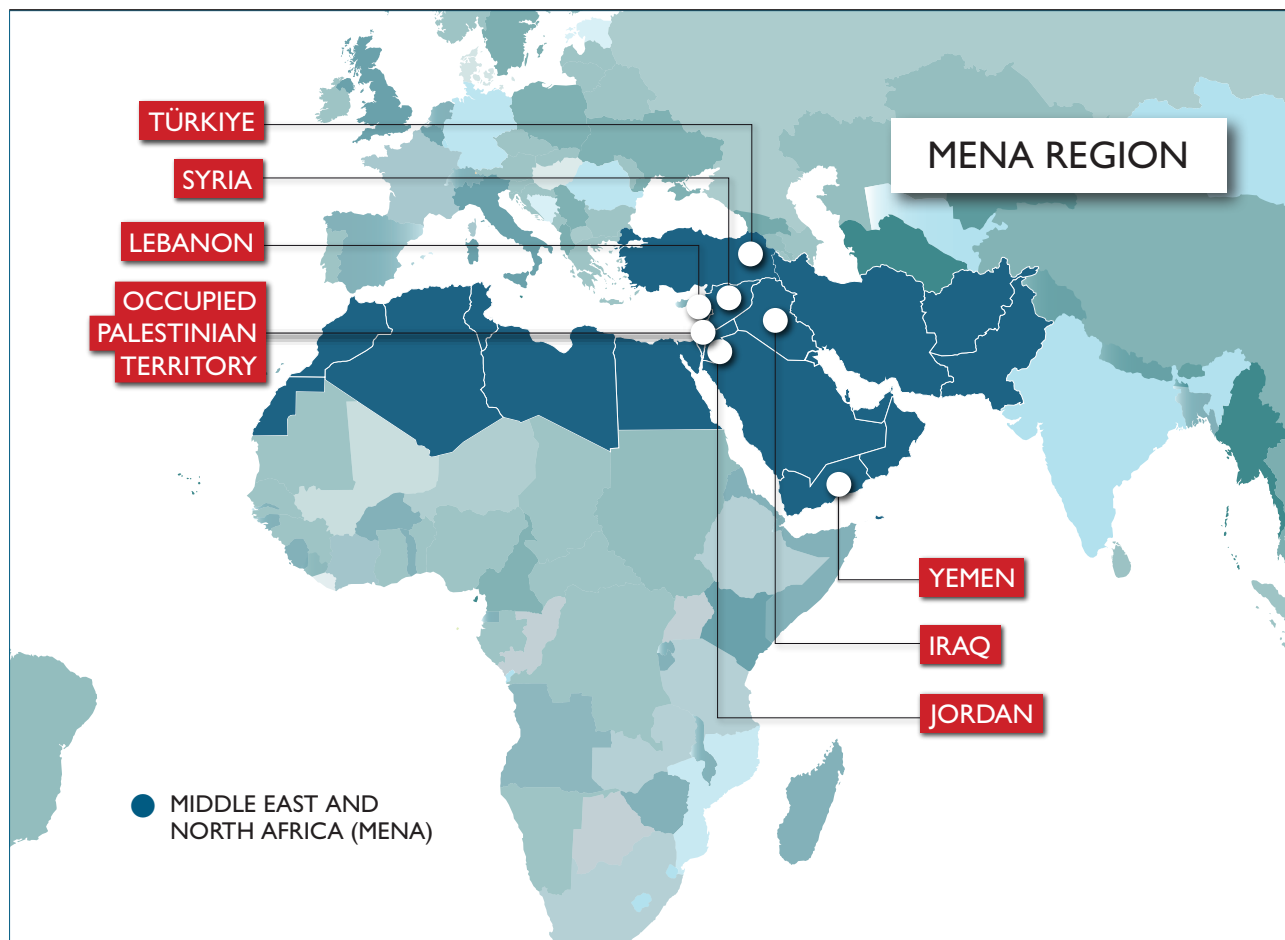


# 01

# INTRODUCTION







**E**stablished in 2016, the Grand Bargain launched a global commitment signed by over 64 organisations to increase commitment towards people-centred and locally-led responses to cash and voucher assistance (CVA) (CALP, 2020). Subsequent policies including the Joint Donor Statement of Humanitarian Cash Transfers, and the UN Common Cash Statement suggested the international community was determined to shift its assistance approach to empowering local actors. The State of the World’s Cash 2020 (SoWC) identified priority actions including increasing funding structures, boosting visibility of local actors, strengthening harmonisation and complementary work between stakeholders.

Seven years have passed since the original signing of the Grand Bargain, yet transformational action towards localisation remains limited. In 2021, only 1.7% of funding within international assistance went directly to local actors, according to ODI (Metcalf-Hough et al., 2021). Although the sector appears committed to a systemic approach to localisation within CVA, approaches and policies remain disjointed (Kreidler and Taylor, 2022). New policies fail to shift power dynamics, adjust business strategies or change partnership models. As a result, sectoral and institutional localisation and locally-led response has not progressed.

In an effort to generate evidence and elevate shared knowledge on locally-led responses to CVA, this research asks, what are the existing policy commitments and actions towards locally-led approaches to CVA in MENA, and what are the potential barriers, solutions and opportunities for progress? Engaging a diverse group of international and local actors, the research highlights tensions between the humanitarian sector’s commitment to localisation and the lack of actionable steps towards localisation in CVA. Further, this research provides recommendations for how the sector can advance the expansion of locally-led approaches in an inclusive and practical way.

## 02 PURPOSE AND SCOPE — OF THE RESEARCH

### 2.1 PURPOSE OF THE RESEARCH

The purpose of the research was to identify opportunities which enable effective and practical progress towards locally-led responses to CVA, and barriers that challenge these approaches in the Middle East and North Africa (MENA) region.

To draw out learning and good practices for operational agencies (national and international), donors, and governments.

To generate evidence and recommendations to inform MPCA and transition approaches, including the development of exit strategies from humanitarian CVA.

### 2.2 RESEARCH OBJECTIVES

The objectives of this research were as follows:

- To improve the understanding of the impact of existing policies & strategies on regional & national stakeholders' ability to strengthen locally-led CVA responses
- To generate evidence and recommendations to harness opportunities and address barriers that would enable effective and practical steps towards locally-led responses at regional and national levels.

### 2.3 RESEARCH SCOPE

The research concentrated on reviewing global, regional and national policies and strategies, focusing on what evidence and best practices exist within the MENA region.

### 2.4 AUDIENCE AND USERS OF THE RESEARCH FINDINGS

Humanitarian cash policy makers, cash implementing agencies, local organisations, coordination bodies, CWGs (or the equivalent where applicable), clusters, humanitarian country teams and donors in the MENA region and globally are the primary audiences for this report.



# 03

# METHODOLOGY





### 3.1 APPROACH

The overall approach was a qualitative study which used mixed methods to ensure robust findings. Through a collaborative and reiterative process, key stakeholders were engaged in the design of the methodology, data collection tools and analysis through regular consultations and opportunities to provide feedback. This assured better quality and in-depth data, while also increasing ownership and probability the research findings and recommendations will be used to inform decisions for future programming. The research focused on the specific information needs of the users of the findings.

The methodology included a desk review of relevant strategies and policy documents, and approximately 35 key informant interviews with key stakeholders. The methodology is further outlined below.

Using this approach, the following research questions were investigated (see Table 1).

**TABLE 1 RESEARCH QUESTION MATRIX**

KEY RESEARCH QUESTIONS	SUB QUESTIONS	INFORMATION SOURCES
<b>What are the key enabling factors and barriers when translating policy commitments to strategic and operational realities, and why?</b>	To what extent have policy commitments been included in regional and/or country strategies towards CVA locally-led responses in MENA?	Desk review, KII
	To what extent were these strategies progressed into actionable steps on a regional/country level, and what were the outcomes?	Desk review, KII
	What barriers have prevented the translation of policy commitments into operations? What are the proposed solutions to strengthen implementation?	Desk review, KII
	What are the key enabling factors and potential opportunities for translating policy commitments into locally-led responses?	Desk review, KII
<b>What is the perception on locally-led responses across key stakeholders (including but not limited to govt, donors, UN agencies, INGOs, LNGOs, and private sector)?</b>	How do different stakeholders define “locally-led” CVA and what are the perceived strengths of current locally-led responses?	Desk review, KII
	How do different stakeholders define their role and responsibilities to locally-led responses in CVA?	KII
	What are the current best practices to locally-led CVA according to different stakeholders?	KII
	What are the key recommendations from different stakeholders on improving locally-led responses to CVA in MENA?	Desk review, KII

## 3.2 DATA COLLECTION TECHNIQUES



The following data collection techniques were used.

### 3.2.1 SECONDARY DATA COLLECTION

The study team conducted a systematic review of relevant literature, policy documents and guidance shared by CALP. The objective of the desk review was to gain a substantial understanding of existing research on locally-led approaches, and policies and strategic documents on cash and voucher assistance in the region.

A full list of documents reviewed is provided in Annex 1.

### 3.2.2 PRIMARY DATA COLLECTION

Primary data was collected using inception interviews with CALP representatives and key informant interviews with a diverse range of stakeholders engaged in CVA in MENA. These interviewees represented **seven** countries across the Middle East and North Africa (MENA) region including Iraq, Jordan, Lebanon, occupied Palestinian territories (oPt), Türkiye, Syria and Yemen. A full list of organisations and countries represented is available in Annex 3.

A research steering committee was formed comprised of members of the MENA Regional Community of Practice on CVA and Locally-led Responses and CALP to guide the research. This committee shared key contacts from across the region. Where possible, CALP and the committee introduced these individuals to the research team. With the lists provided, the research team contacted and invited all available professionals to participate in a key informant interview. When appropriate, the research team used a snowballing sampling technique to identify additional informants.

Three standard semi-structured question guides (available in Annex 2) were used to facilitate the discussion in KIs. These guides were designed based on the type of stakeholder being interviewed. These categories included international actors, defined here as individuals representing international non-governmental organisations (INGOs) and professionals from the United Nations (UN) System; local actors which included government representatives, professionals from local and national non-governmental organisations (NGOs), national financial service providers (FSPs) and Red Cross and Red Crescent (RCRC) National Societies; and donors characterised by their representation in funding institutions or consortiums. Key informant interviews were conducted using English or Arabic based on the informant's preference.

A total of **35** participants were interviewed – 19 international actors and 16 local actors (see Table 2).

**Primary data was collected using inception interviews with CALP representatives and key informant interviews with a diverse range of stakeholders engaged in CVA in MENA**

**TABLE 2 PRIMARY DATA COLLECTION**

	INTERNATIONAL ACTORS Representing INGOs, UN System, international donors or funding institutions	LOCAL ACTORS Representing local or national NGOs, local FSPs, government, RCRC	TOTAL
IRAQ	3	8	11
JORDAN	3	1	4
LEBANON	1	3	4
oPT	2	2	4
SYRIA	4	0	4
TÜRKIYE	1	0	1
YEMEN	2	2	4
MENA (multi-country)	3	–	3
<b>TOTAL</b>	<b>19</b>	<b>16</b>	<b>35</b>

### 3.3 ANALYSIS

The research team used a content analysis approach and developed a coding structure based on the emergent themes in the data. They coded the data to streamline concepts and identify elements of interest from the key informant interviews and documents review. The research team used Excel codes and collated the data.

Finally, the research team corroborated desk review findings with the key informant interviews to check consistency and produce an in-depth understanding of locally-led responses to CVA in the MENA region.

### 3.4 ANALYTICAL FRAMEWORK

To critically analyse the existing barriers and opportunities to locally-led responses to CVA, the research team used an **analytical framework** called the Power Cube (Gaventa, 2019). This framework analyses how power manifests in different forms, and creates or closes different spaces of power for different actors. Spaces of power may include closed spaces, which are not accessible to local actors; invited spaces, which are environments in which international actors invite in local actors, but participation varies; and claimed spaces, in which local actors actively define and mobilise themselves.<sup>1</sup> Within these spaces, power can take several different forms:

- **VISIBLE POWER:** observable forms of decision-making e.g. policies, legislative bodies, forums
- **HIDDEN POWER:** framing of issues in a way that prioritises interests of some, but devalues or ignores other actors' concerns
- **INVISIBLE POWER:** internalisation of power structures that normalises inequalities as the status quo.

Examining these dimensions allowed the research team to map the context and power dynamics which influences the operationalisation of locally-led responses to CVA. The research team developed strategic recommendations with these power dynamics in mind.

## 04 LIMITATIONS

The research relied on a purposeful sampling method and the identification of key informants through contacts of the CALP Network and recommendations from the MENA LLR CoP. This method is useful for gathering information from a variety of stakeholders useful to the study, however organisations and actors less familiar with CALP or the LLR CoP may have not been included in this research.

The research team designed data collection tools to be approachable and inclusive of all local actors, but only two government representatives were interviewed. In some cases, this was due to connectivity and availability. Where government officials could not be reached, the research team identified international actors who work closely with national counterparts. The research team took measures to make interviews accessible as possible, such as hiring a local consultant to conduct interviews in Arabic. However, invisible power dynamics such as reluctance to share opinions and policies with international actors, may have also contributed to low engagement of local actors and limited review of policies from locally-based agencies.

Additionally, due to the ongoing emergency response following the Kahramanmaras earthquake impacting Türkiye and Syria, local actors in both countries were unavailable to participate in this research. As a result, the research team was only able to engage one individual from Türkiye and only international actors in Syria for their perspective on locally-led CVA.

## 05 DATA QUALITY MANAGEMENT

CALP and the research committee in each phase of the consultancy reviewed and validated processes and deliverables. The research team had (approximately) fortnightly catch-up meetings to inform CALP about progress and challenges during delivery. In addition, the CALP team organised an online working space to facilitate interaction, sharing of documents and simultaneous revision of documents and deliverables.

Action Against Hunger UK (AAH UK) followed their internal Evaluation Policy to reinforce the quality and accountability throughout the delivery, in line with international evaluation norms and standards. This policy outlines the key principles that AAH UK follow, namely: impartiality and independence; credibility; usefulness; transparency and participation; and gender equality.



# 06

# FINDINGS





## 6.1 HOW DO DIFFERENT STAKEHOLDERS DEFINE “LOCALLY-LED” CVA AND WHAT ARE THE PERCEIVED STRENGTHS OF CURRENT LOCALLY-LED RESPONSES?

**There is no consensus on the definition of “locally-led” cash and voucher assistance (CVA).** Most respondents agree that localisation implies that local actors become responsible for the design, implementation, management or coordination of cash or voucher programmes. However, different stakeholders disagree on which local actors should take over responsibility for CVA. There is also divergence in opinion on the objective of locally-led CVA and the motivations for favouring local CVA. These differences between international organisations and consortia, donors and local actors are summarised in Table 3 and explained in more detail in the subsequent paragraphs.

**TABLE 3 DEFINITION OF “LOCALLY-LED” CASH AND VOUCHER ASSISTANCE (CVA) FOR DIFFERENT STAKEHOLDERS**  
(international actors and consortia, donors and local actors)

FROM THE PERSPECTIVE OF:	DEFINING LOCAL ACTOR	PERCEIVED OBJECTIVES	MOTIVATIONS
<b>International organisations and consortia</b>	Local NGOs RCRC National Societies Employees with local nationality working within international organisations	Partner international NGOs with local NGOs “Empower” local NGOs by international NGOs	Follow conventional wisdom Gain access to difficult to reach communities and areas Enhance programme quality
<b>Donors</b>	National governments Local NGOs	Integrate parallel social assistance systems for both refugees and host communities	Sustainability Reduce cost of assistance to refugees Transition away from humanitarian approaches and funding streams to adopt a nexus approach Enhance resilience
<b>Local actors</b>	Local NGOs Community-based organisations	Power to design, implement, manage and coordinate CVA programmes independently of international NGOs Replace international NGOs Partner with other local actors including government, private sector and civil society organisations.	Improve equality between local and international NGOs Enhance programme quality



**The international community characterised locally-led response as those developed and employed by either governmental or local NGO actors.** Several stakeholders, representing INGOs and consortia, defined locally-led approaches as being delivered by local NGOs and RCRC. These stakeholders reflected that localisation implies that more CVA responsibilities should be transferred to local actors, while the international community maintains control of tasks related to accountability, data protection and security. Localisation was viewed as a result of partnerships between these local and international organisations. Whereas other individuals highlighted government-led approaches, such as social protection assistance, as a local response. One UN employee stated, “The first thing that comes to mind is the government. It’s like the distinction between a government-led and NGO-led, both which could fall under locally-led CVA.” Similarly, a FCDO staffer in Jordan said, “... we always work on a more strengthening of government systems approach rather than smaller scale and work through kind of NGOs and/or civil society.”

In contrast, one UN employee and another from an INGO **argued that employing more local staff was a sufficient solution to achieving locally-led CVA.** In the words of one international NGO participant, “I don’t really see local NGOs leading the response as much as having local people working in the system.” This narrative suggests that locally-led CVA can be achieved at an individual level, rather than at an organisational level in which local agencies themselves are leading. This definition validates the continued leadership and decision-making power of international organisations as opposed to other definitions of locally-led CVA.

Compared to their international counterparts, **local NGOs defined locally-led response as delivery without dependency on international NGOs’ long-term assistance.** Local actors defined locally-led CVA as a system of equality between stakeholders. One respondent described localisation as “... local actors like us having the same grants, same technical capacity, same knowledge and same accountability as those at an international level”. However, partnerships with international NGOs were described as superficial because they do not involve sharing decision-making power. For example, one local NGO in Iraq stated that “... it is the INGOs who decide on the modality of the payment, amounts, types of cash-based assistance (protection, food, health) as well as the selection criteria. Hence, it is mostly internationally controlled and driven approach ...”.

## PERCEPTION OF STRENGTHS AND WEAKNESSES

**For the majority of international respondents, the strengths of localisation in CVA outweigh any possible weaknesses.** There were only two international informants (out of a possible 11) who were “localisation sceptics” arguing against locally-led CVA. A desire to improve programme quality (by better using the skills and knowledge of local actors) or an acknowledgement that partnership with local organisations (in contexts such as Syria) is often a prerequisite to gain access to conflict-affected communities tended to be the motivation for those in favour of a locally-led response. Undoubtedly, there were some representatives from international NGOs with an unthinking commitment to localised CVA. These interview participants accepted the conventional wisdom that locally-led CVA is a “good thing” but were unable to explain in detail why.

The perceived strengths and weaknesses of locally-led approaches are summarised in Tables 4 and 5 below. The strengths of locally-led CVA highlight moments where local actors should and could potentially hold more power in CVA responses, but the perceived weaknesses of locally-led response contribute to existing barriers to implementation (further discussed in section 6.5).

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**TABLE 4 PERCEIVED STRENGTHS OF “LOCALLY-LED” CVA**



# KIIS WHO MENTIONED THIS STRENGTH:

**INTERNATIONAL  
STAKEHOLDERS**  
INGOs, UN agencies,  
funding institutions

**LOCAL  
ACTORS**  
NGOs, FSPs,  
government

**Longer term commitment**

Local governmental and non-governmental organisations were perceived to have a long-standing presence with/in their communities. This commitment allows local organisations to build trust and contextual knowledge essential to locally-led CVA. In contrast, their international equivalents such as professionals in UN agencies are often required to relocate after 2 to 3 years or transfer their programmes due to new funding priorities. This was seen as a disadvantage compared to the commitment of local NGOs, governments and smaller FSPs. In a few cases, key informants suggested that the mobility of international professionals allows them to build experience at a global level, which was perceived as more advantageous than a long-term presence in a community.

3

3

**More sustainable**

International stakeholders perceived contribution-based social protection schemes as more sustainable than the humanitarian social assistance schemes in place throughout the MENA region. For donors, these government-led responses enable the international community to support a humanitarian-development-peace (HDP) nexus approach in the long run. Other professionals from INGOs suggested that locally-led CVA can also support transitions from new to protracted crises. If local actors are involved at the onset of crises, they can continue to support the community as international stakeholders reduce their involvement.

5

0

**Greater contextual understanding**

Stakeholders at all levels assumed that local NGOs and governments have an enhanced understanding of the needs of communities. Cultural understanding, long-term commitments to communities, and trust gained through years of presence may allow local actors to build a greater knowledge of community vulnerabilities. However, a few international participants suggested these factors can also lead to bias and nepotism especially as a result of intra-state conflicts. This is discussed as a weakness below.

8

9

**Enhanced access**

In some MENA contexts, only local NGOs are permitted access to certain locations. This is the case, for example, in Government of Syria (GoS) controlled areas where international NGOs are usually only able to implement programmes through local partnerships. Both international and local informants presented this as a key advantage to locally-led CVA.

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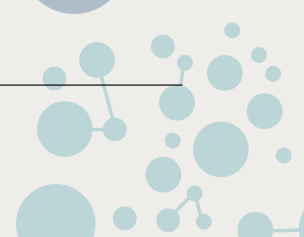
9

**Limited language barriers**

One local NGO suggested their knowledge of local dialects can be used to build their relationship and trust with local communities. This local actor suggested INGOs and UN agencies often operate in English, even if some of their staff is national.


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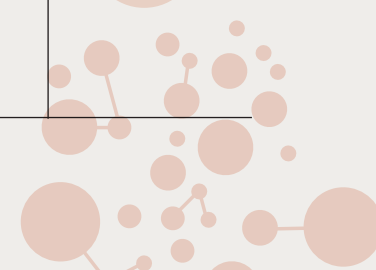


<p><b>Trust</b></p> <p>In general, both international and local interviewees believe that communities and governments are more likely to trust local NGOs, especially in contexts of conflict. Actors from local NGOs saw this as one of their greatest strengths and a reason to promote locally-led CVA. However, the international community must assess the context to ensure that local staff are not simply assuming risk without proper security measures in place.</p>	3	6
<p><b>Cost efficiency</b></p> <p>International and local stakeholders assumed that local NGOs had lower overhead costs compared to UN agencies, and thus could deliver CVA more cost efficiently. Local NGOs cited that the salaries of their staff are lower than international counterparts, while an INGO suggested that the money retained by UN headquarters remains unnecessarily high. A UN actor thought locally-led response was 'greater value for money'. However, both the international community and other local NGOs flagged the inadequacy of current budget lines allocated to local NGOs for their existing operational needs. Many stakeholders call for increased administrative funds for local NGOs, and this may affect perceived cost efficiencies if delivered.</p>	3	4

**TABLE 5 PERCEIVED WEAKNESSES OF "LOCALLY-LED" CVA**

	# KIIs WHO MENTIONED THIS WEAKNESS	
	INTERNATIONAL STAKEHOLDERS INGOs, UN agencies, funding institutions	LOCAL ACTORS NGOs, FSPs, government
<p><b>Reduced operational capacity</b></p> <p>Two themes emerged in relation to the operational capacity of local actors:</p> <ol style="list-style-type: none"> <li>1. Inadequate "support systems" (such as human resources capabilities, adequate finance departments and information technology)</li> <li>2. Lack of financial and time resources in comparison to INGOs and UN agencies.</li> </ol> <p>The international community has maintained control of most decision and accountability processes, with this weakness as the claimed rationale. To reduce this weakness, local informants called for their international counterparts to provide systems strengthening and financial resources for operational gaps.</p>	7	4
<p><b>Lack of technical or academic knowledge</b></p> <p>Staff within local organisations and national governments were commonly assumed to be lacking in technical or academic expertise. This was particularly the case in countries such as Iraq or Syria which have experienced a decline in the graduate level population (or "brain drain"). In addition, better pay and conditions within international organisations may attract high-quality staff. Both international and local actors have internalised this perception, reinforcing the assumed superiority of international professionals.</p>	2	3

<p><b>Reduced ability or willingness to assist refugees</b></p> <p>Governments in host countries were typically thought to prioritise the needs of the host community at the expense of refugees. This view contributes to the international community's mistrust in government bodies.</p>	<p>2</p>	<p>0</p>
<p><b>Unable to operate at scale</b></p> <p>Some respondents perceived a tension between the commitments to both expand and localise CVA in the MENA region. One respondent stated, "... there are a lot of commitments on increasing CVA, reducing the number of actors and increasing the size of interventions. I mean they don't really go together with localisation. It's not realistic, to give a million-dollar project to any local organisation that I'm aware of". This perception and the desire for scalability justifies the continued presence of the international community.</p>	<p>2</p>	<p>1</p>
<p><b>Coordination challenges</b></p> <p>Some respondents anticipated greater coordination challenges associated with multiple smaller local NGOs delivering CVA, as opposed to standard partnership models which prioritise working exclusively with UN agencies, or one large local NGO such as a RCRC National Society.</p>	<p>2</p>	<p>0</p>
<p><b>Data challenges</b></p> <p>Typically, with CVA programming across the MENA region, UN bodies hold participant databases. Two international stakeholders and one local NGO suggested this is due to perceived protection challenges and risks related to sharing CVA data with local NGOs, FSPs and governments.</p> <p>Furthermore, in many contexts data ownership underpins the centrality of international agencies within the humanitarian system, leaving local NGOs undermined as secondary actors. One respondent described how in Lebanon: "... UNHCR is leading the response of cash to refugees and as the owner of that data ... anyone who wants to do cash support to refugees, for example, would have to coordinate with them to get data, to cross check, to avoid duplication et cetera ... having NGOs own that data would be a challenge in and of itself and without that it would be difficult to see them leading the response."</p>	<p>2</p>	<p>1</p>
<p><b>Trust and nepotism</b></p> <p>International stakeholders, including donors, INGOs and UN agencies, perceived local staff to be more likely to address family and friends' needs as opposed to serving the wider community. Negative perceptions of political affiliation, nepotism or other types of bias was perceived to influence the trustworthiness of both local NGOs, FSPs and government agencies.</p>	<p>6</p>	<p>0</p>
<p><b>Inertia</b></p> <p>In some protracted crises, local NGOs were accused of defending the status quo and being closed off from external expertise. In the words of one respondent: "... people are very inward-looking in oPt, knowing very little of how things work abroad and being less open to ideas coming from elsewhere. Which for a UN agency and international actor will be way easier to convey than the local one."</p>	<p>1</p>	<p>0</p>



## 6.2 HOW DO DIFFERENT STAKEHOLDERS DEFINE THEIR ROLE AND RESPONSIBILITIES TO LOCALLY-LED RESPONSES IN CVA?

Participants were asked about how their roles and responsibilities related to locally-led CVA. Actors from INGOs, UN agencies and financial institutions perceive a responsibility in leading and guiding CVA even when more roles were distributed to local actors. Within organisational policies and key informant interviews, the responsibilities of international actors in locally-led CVA was to “support”, “align”, “partner” or “collaborate” with local actors, as evidenced in Table 6 below. International actors were more often characterised as a more knowledgeable CVA actor reinforcing their role in decision-making. Representatives from local NGOs hoped to acquire more leadership positions but currently felt their positions and expertise reinforced their part as ‘service providers’. While local actors demonstrate leadership abilities and CVA expertise in various programmes, these perceptions can become internalised and perpetuate existing power imbalances between international and local actors. This invisible hierarchy between international and local actors affects the expansion of locally-led response, as further discussed in section 6.5.

**TABLE 6 ROLE AND RESPONSIBILITIES OF THREE SAMPLED INTERNATIONAL ACTORS RELATED TO LOCALLY-LED CVA**

INTERNATIONAL ACTOR	STRATEGY DOCUMENTS	ROLE AND RESPONSIBILITIES IN LOCALLY-LED CVA
ECHO	Common Donor Approach for Humanitarian Cash Programming (2019)	To link up and <b>align</b> national mechanisms, particularly social protection systems, with humanitarian cash programmes. To recognise the value of a diversity of actors within cash programming, while <b>supporting</b> the development of coherent systems and common approaches.
UNHCR	UNHCR Policy on Cash-based Interventions (2022 – 2026)	<i>“To <b>collaborate</b> with stakeholders in CBI planning and implementation by working closely with Governments, building and strengthening strategic partnerships and alliances, including with sister agencies, NGOs, persons of concern and the private sector. UNHCR will <b>advocate, coordinate and deliver</b> CBI through collaborative cash approaches with partners that are coherent, avoid duplication and can leverage national systems in every feasible way with a view to transition to sustainable approaches post-emergency. Collaboration with local partners will be at the core of implementation.”</i> (Objective 4)
IFRC	IFRC: Cash and Voucher Assistance, Regional Road Map (2022 – 2023)	To focus on localised responses by <b>prioritising capacity building</b> and the development of regional pools of experts within national Red Cross and Red Crescent Societies. To ensure that the use of CVA increases within national societies. To <b>promote coordination and partnership</b> between national societies and local FSPs.

### 6.3 TO WHAT EXTENT HAVE POLICY COMMITMENTS BEEN INCLUDED IN REGIONAL AND/OR COUNTRY STRATEGIES TOWARDS CVA LOCALLY-LED RESPONSES IN MENA?

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**At a global level, the Charter for Change (2023) serves as a guiding document for national and international NGOs to practically advance their commitments and actions in humanitarian aid using locally-led approaches.** Over 510 national and local organisations including stakeholders across MENA signed this charter. It creates visible and observable steps the humanitarian sector could take to improve locally-led responses. This commitment proves an example to a sectoral commitment led by local agencies themselves, but the international community continues to largely overlook the charter. Only 39 international organisations have signed it, none of which are UN agencies.

**In MENA, policy commitments emphasising locally-led responses to CVA remain varied.** Individuals from UN agencies reported using global policies to inform their programmes such as the UNHCR Policy on Cash Based Interventions (UNHCR, 2022), which includes the prioritisation of locally-led approaches. INGO actors mentioned the New Cash Coordination Model (IASC, 2022) as a guiding document used to support localisation efforts. Several national action plans, such as OCHA's Yemen Humanitarian Plan emphasise the alignment of cash programming with social assistance. Other key informants reflected that coordination groups were most likely to have strategies related to locally-led response such as guidance on increasing participation of these actors or ensuring a leadership position is allocated to a local stakeholder. In interviews, ECHO, and People in Need (PIN) reported that their organisations are developing explicit guidance in 2023. However, most stakeholders reported their organisations did not have a policy specific to locally-led responses.

**Local actors felt the international community's commitments to locally-led response remains superficial.** One local NGO in Iraq stated, "There is no policy or a specific strategy towards the localisation in Iraq. It is rather ad-hoc and context-driven." Geographical obstacles and complex security situations are driving current partnerships with local organisations. As the security situation has improved, these local actors are seeing an influx of the registration of INGOs and decrease in partnerships. These stakeholders perceived limited motivation from the international community to enact real change towards localisation.

**The lack of policies and clear guidance on locally-led responses in MENA signals a delayed and reluctant commitment to transformative change towards localisation.** Although organisational strategies do not necessarily equate to action (as discussed in the next section), commitments can hold the international community accountable to empowering local actors in the sector. Without clear guidance, the international community in MENA could maintain the status quo of existing partnership models and lead CVA with little input from local actors.

**Local actors felt the international community's commitments to locally-led response remains superficial**

## 6.4 TO WHAT EXTENT WERE THESE STRATEGIES PROGRESSED INTO ACTIONABLE STEPS ON A REGIONAL/COUNTRY LEVEL, AND WHAT WERE THE OUTCOMES?

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**Many international participants suggested their organisations are increasing local NGOs' capacity.** PIN are piloting a platform called Civil Society Now (CSN) in Nepal to increase accessibility to guidance and resources on international project requirements. Other international organisations are strengthening local systems through mentoring, secondment and job training for local staff. For example, the World Food Programme (WFP) hired a Partnership Advisor to act as a liaison for local NGOs and guide them through international Global Data Protection Regulations (GDPR) and system requirements. **However, these systems strengthening actions remain inadequate.** One local actor stated, "Localization has been focusing on the training and capacity strengthening of local NGOs so far, but not on enhancing and improving their internal systems, policies, and upgrading their organizational structures." Current strategies provide information to local NGOs on operational processes but fail to address financial and administrative barriers to robust systems development. As a result, these methods appear tokenistic.

**International members of working groups reported their coordination bodies have made steps to establish inclusive policies and language for local actors.** International stakeholders characterised coordination groups as a space of increased strategic engagement and collaboration with local partners. In Iraq, the Durable Solutions Coordination Platform was developed to encourage local NGOs to take on active roles in the Technical Working Group. In oPt, a local NGO stated the presence of the CWG and protection cluster, "provided a good platform for communication and engagement of local actors, a way to gather their feedback and inputs with regards to CVA". Working groups in Iraq and oPt require meetings and workshops to be conducted in Arabic. However, several local NGOs and a few international actors from INGOs suggest participation in these collaborative groups remains a key barrier, rather than a moment of progress.

**Commitments to aligning international CVA to social protection systems also remain limited.** Several actors noted the international approaches to CVA exist in parallel to local initiatives rather than in collaboration. When asked about the steps taken to meet the Common Donor Approach, ECHO suggested they are only at the "very beginning of a much more systematic approach to ... aligning humanitarian cash transfers to the government system".

Although funding institutions identify locally-led response as a core priority, **few institutions have developed requirements for direct funding to local actors.** International actors working within Gaza stated that they have noted more funding institutions such as Canada International Development Agency (CIDA), and ECHO require reporting indicators on the percentage of funding provided to local partners. However, no changes in funding allocation to local partners has been noted. In 2019, three country based pooled funds (CBFPs) including the oPt Humanitarian Fund, the Syria Cross Border Humanitarian Fund (SCHF) and the Yemen Humanitarian Fund (YHF) were reported to allocate more than 25% of their funding to local actors (Clements, 2021). However, these funding opportunities remain low compared to the global humanitarian sectoral budget. With only 1.7% of international budget reportedly going towards local actors in 2021, funding for these national stakeholders decreased significantly from 2020, during which 4.7% of international funding was allocated to local organisations (Metcalf-Hough et al., 2021). Local NGOs and governments' access to direct funding opportunities in the last five years remains inadequate.

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## 6.5 WHAT ARE THE CURRENT BEST PRACTICES TO LOCALLY-LED CVA ACCORDING TO DIFFERENT STAKEHOLDERS?

Although actions towards locally-led CVA remain varied and limited in comparison to the perceived interest in policy commitments, three examples of best practices were identified in this research. As summarised in Table 7 and further below, Estidama++ in Jordan was claimed to be a productive example of a government-led response that merges local leadership with international interest in linking CVA with social protection. In contrast, systems strengthening was seen as successful in Iraq through the AHC and the CARMA Consortium in Syria.

**TABLE 7 SUMMARY OF IDENTIFIED AREAS OF BEST PRACTICE IN LOCALLY-LED CVA**

BEST PRACTICE	TYPE OF LOCALLY-LED RESPONSE	SPACES OF POWER	EXAMPLE
<b>Connecting CVA and social protection systems</b>	Government-led	Supporting local social protection systems to allow national governments to claim space in designing and delivering CVA.	<b>1</b> Estidama++ in Jordan
<b>Improving local operating systems and transitioning ownership of CVA to local organisations</b>	Local NGO-led	There are examples of local NGOs claiming CVA leadership space, and international actors providing technical support.	<b>2</b> AHC partnership with Catholic Relief Services (CRS) in Iraq <b>3</b> CARMA Consortium in Syria

**Estidama ++ highlights how linkages between CVA and social protection systems can create space for government-led cash assistance.** Implemented by the Jordanian government, International Labour Organisation and UNHCR, this contribution-based social protection scheme is open to both refugees and the host community who are registered as workers in the formal economy. For FCDO, Estidama++ demonstrates how government-led CVA can transition from emergency cash to a self-reliant social protection system. This was seen as a favourable example of a graduation and nexus approach to CVA in MENA. However, this programme does have limitations. Reliance on social protection systems such as this jeopardises the additional support that vulnerable populations require, such as most refugees who are ineligible for the programme. Additionally, this may be an example of government-led CVA, but locally-led CVA practices must also capture the significance of other local actors like NGOs and FSPs.

**With improved operating systems and procedures, two local NGOs successfully led CVA responses in Iraq and Syria.** The AHC, a local NGO formed in Iraq stated, “... the best examples of CVA are when there is a local NGO that’s leading the whole project, but also has an international NGO as a consultant. That’s why we were lucky enough to have CRS with us ... having a consultant reassures USAID and gives us also the push that if we go throughout this path and if we don’t know how to deal with a specific thing, we do have someone to go back to.” CRS provided support to AHC which included guidance related to finance and procurement. This actor continued, “... we [AHC] can work independently now. AHC is a very new NGO. We were only established in 2020 ... we spent the first 12 to 18 months, building all the policies, procedures, systems and everything else for which we had CRS support and now I think we’re already there as a local NGO and our next project with USAID is focusing on livelihoods and we will deliver it without an international partner”.

In a similar example, the CARMA Consortium in Syria collaborated with faith-based organisations to build local NGOs’ technical CVA knowledge and systems development. Subsequently, these local NGOs took over responsibility of design, and delivery with a higher cost efficiency than INGOs in the consortium. Today, these international actors continue to provide technical support on data protection and security where needed. Through many years of partnership, international respondents suggested the achievement of this transition of power was a result of strong rapport and relationships with these local partners.

AHC and CARMA demonstrate equitable partnerships that highlight a step towards more locally-led response. AHC and local NGOs in CARMA were given trust, responsibility and the overall space to claim power in CVA. However, this is only a small step towards transformational change within cash assistance and delivery. In these examples, **international actors still maintain substantial oversight over the CVA projects.**

## 6.6 WHAT BARRIERS HAVE PREVENTED THE TRANSLATION OF POLICY COMMITMENTS INTO OPERATIONS?

Both local and international actors identified **the funding ecosystem and the international standards as the primary barriers to locally-led responses in CVA.** Financial institutions have high standards of accountability, data protection and transparency, and often restrict direct funding to local stakeholders. These measures are perceived as risk management measures to ensure that taxpayer money is reaching the most people in need while adhering to international financial laws, GDPR and political neutrality. To access these funding streams either directly or indirectly through international partners, local actors are required to demonstrate compliance and accountability systems.

**While these forms of risk management are important for accountability, this model overly emphasises gold standard reporting (Cabot Venton and Pongracz, 2021) and does not accurately capture local organisations’ capabilities.** Two local actors in Yemen expressed frustration that in their partnership with UN agencies, they face restrictions in reporting their own data, such as number of people affected receiving cash, due to fear of data duplication. As a result, this organisation felt they could not accurately portray their

**With improved operating systems and procedures, two local NGOs successfully led CVA responses in Iraq and Syria**

experience and success. One local FSP stated, “you have limited resources and length of time you need to prove your track record. It is very frustrating”. A local NGO from Iraq further claimed that even when they established procedures for international accountability requirements, their international partner did not redelegate any decision-making power.

**Many financial institutions continue to prohibit direct and fair funding to local NGOs and governments.**

Local organisations shared that even in places where they have been working for over a decade, they cannot access ECHO or small funds from UK agencies. An actor from ECHO reported, “based on our legal framework the DG ECHO cannot provide direct funding to national partners or civil society”. One international actor from oPt stated, “what is our flexibility to actually fund them? This is one of the main barriers. Donors, because of their own internal regulations, block us from delivering funds directly to local actors”. Access to direct funds is further restricted in contexts without secure banking systems. For example, in Northeast Syria, local actors must rely on international organisations that can access their financial resources through their offices in bordering areas such as in Türkiye. As a result, international funding mechanisms remain a closed space, excluding most local actors from accessing necessary money to lead projects.

**The funding ecosystem was also described as a “market” where international organisations are driven to maintain a competitive advantage to maintain control of financial streams.**

The current humanitarian model prioritises organisations that can provide a ‘one-stop shop’ to programming. As a result, large INGOs and the UN System control most of the funding opportunities (Cabot Venton and Pongracz, 2021). In areas where funding shortages were especially acute, like oPt, local actors argued that the general scarcity of aid money, particularly disadvantaged local organisations as international actors monopolise the small amounts of funding available. One local actor reflected, the international community “doesn’t want to adapt because the funding may go to others, not to them. So, they want to control the funding flow to the country”. Additionally, with success often measured in scalability of CVA programmes, and the amount of funds secured, INGOs can be reluctant to transition resources to local NGOs or attempt new innovative approaches. This disincentivises collaborating and redirecting funds to local partners which could result in reducing the financial resources available for INGOs and the UN system.

**The concentration of international standards fuels the narrative that local NGOs and governments have weak capacity and systems.**

Unilaterally, the international sector assesses local capacities as too weak to support robust programming. The international structure is prioritised and is recognised as superior to the processes already established in a local context. These narratives have fuelled the need to support capacity building through training and systems strengthening. However, this power dynamic remains top-down in which Western expertise is favoured and local knowledge is discounted. One international actor in Iraq, reflected “the whole system is not built from national NGOs. It is always internationally led. So, it requires local NGOs to adapt to the international. They always have to adjust and fit in, rather than being part of the situation”. Local stakeholders are framed as secondary players in this context. Additionally, the tendency to employ one-off training opportunities prior to implementation fails to address any of the systematic and structural weaknesses that local actors are perceived to have. Until local actors have unrestricted access to build their own systems, they remain reliant on international processes and continue to be perceived as inferior to the international partners.

**The concentration of international standards  
fuels the narrative that local NGOs and  
governments have weak capacity and systems**

**International actors supporting refugee communities thought their mandate for international community “to take responsibility of refugees until there is a political solution” restricted their ability to transition to locally-led responses.** One representative from United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA) suggested this mission has filtered into a mentality that the international community must “do everything ourselves”. While some conversations are held in the organisation around sub-contracting to local partners, this actor suggested that their agency could face criticism if too much decision-making power was transitioned away from the international sector. Shifting the power towards the government and local NGOs was seen as contradictory to the mandate of international responsibility of refugees. This narrative ignores the possibility that the financial responsibility could remain within the international sector, while local stakeholders take leadership in the design and delivery of CVA.

**While many coordination groups in MENA reserve leadership positions for local actors, participation of local NGOs and government in these mechanisms remains limited.** Local NGO staff in Syria and Yemen reflect their own reluctance to participate in these groups was associated with language, and the perceived hierarchical structure of these environments. These group meetings are often conducted in English with high use of jargon and acronyms. This makes it difficult for non-native English speakers to feel comfortable, especially in regions where language is a sense of cultural identity and a source of pride. Other local staff felt that local perspectives were ignored, dismissed or used only to the benefit of the international agencies. In a few instances, local actors suggested they wanted to participate, however lack of funding and time available to perform these administrative duties limits their engagement. These factors challenge coordination groups’ ability to be safe, collaborative spaces and instead reinforce internalised power dynamics in which international actors are more visible and seen as more knowledgeable.

**Even in instances where participation of local actors in coordination and CWG groups has increased (Clements, 2022), these local actors are not represented in decision-making positions.** The representation of local actors still only accounts for less than 6% of overall leadership positions across the region (Clements, 2022). The representation of international agencies often overpowered the voices of local actors. In Lebanon, the Ministry of Social Affairs co-chairs the Basic Assistance Working Group but this leadership was perceived as tokenistic. One informant from an international coordinating body suggested that transformational change in these collectives requires the motivation from the co-lead to take a seat while the local co-chair facilitates.

**Across the region, respondents highlighted that the mistrust and scepticism of local actors has inhibited the advancement of locally-led responses in these countries.** One individual stated, “We are able to produce, for example, quality concepts for some proposals. But because we’re local, we are new, lots of donors do not really know us. Donors are afraid to take that leap of faith and put that trust in us.” Trust has also affected relationships between local stakeholders. One local FSP reported their preference to engage directly with international partners rather than local civil society organisations (CSOs), as international organisations were considered more credible. These mindsets influence the uptake of localisation and the power imbalance between international and local is maintained. As a result, many local stakeholders continue to be perceived as service providers rather than active partners and decision makers.

**While many coordination groups in MENA reserve leadership positions for local actors, participation of local NGOs and government in these mechanisms remains limited**

**The commitment to remain neutral and apolitical in assistance has further built hesitation and wariness to collaborate with local agencies in MENA.** In some countries, political division, corruption, political affiliation, and nepotism have contributed to caution in partnering with local governments and local NGOs. Without robust financial accountability and data protection mechanisms, local NGOs and governments struggle to prove their neutrality and trustworthiness to the international community. Subsequently, political context and trust become deeply connected.

Overall, these practical and ideological barriers continue to prohibit the enhancement of locally-led CVA in MENA. **Without fundamental changes to the financial ecosystem, elevating local actors' strengths, and acknowledging the international community's power, little advancement will be made towards locally-led response.**

## 6.7 WHAT ARE THE KEY ENABLING FACTORS AND POTENTIAL OPPORTUNITIES FOR TRANSLATING POLICY COMMITMENTS INTO LOCALLY-LED RESPONSES?

**Emergency responses such as the earthquakes in Türkiye and Syria, escalations in Gaza and COVID-19 have highlighted the success of locally-led responses.** Respondents highlighted the need to capture and use learning from these contexts, where local actors are often the first responders to a crisis. Stakeholders perceived locally-led responses to be higher in emergency contexts or in locations inaccessible to the international community due to necessity rather than demand. Local agencies can claim the assistance space because the international community is excluded due to factors of security, government approvals, proximity and urgency. A stakeholder from Syria stated that we should look at how these locally-led mechanisms can transition into early recovery and eventually a development approach.

**One FSP highlighted that digitalisation of cash can support the expansion of locally-led CVA, and direct partnership between donors and local actors.** An FSP, owned by a Lebanese national based in Spain, suggested that digitalisation has allowed their organisation to claim a space in digitally transferring funding from European donors into local systems in Lebanon in a safe and transparent way. However, in this example this FSP has successfully adapted their innovation and systems to match international standards, thus appeasing international concern about exchange rate issues and security concerns of financial institutions solely based in MENA. Another stakeholder in Jordan highlighted that the digital expansion of the National Aid Fund (NAF) system has led to the expansion of government assistance. All governmental bodies can access a unified national registry to ensure people affected receive assistance. In contrast, an actor in Iraq mentioned that the lack of digitalisation within the country has slowed the progress of locally-led CVA.

**As highlighted in best practices, supporting social protection mechanisms was seen as an opportunity to support national efforts of CVA in Iraq and Jordan.** With existing strategies towards national protection assistance, the international community can align their approach with the national transfer values, delivery mechanisms and coordination structures used by the government and local NGOs.

**One FSP highlighted that digitalisation of cash can support the expansion of locally-led CVA, and direct partnership between donors and local actors**

However, one international informant indicated that the success of locally-led CVA in connection to social protection depends on external factors such as the stability of the national economies. In Yemen, Gaza and Syria, where there are weaker social assistance programmes, international actors have reported challenges and inefficiencies in linking with these locally-led responses.

**Existing trust and rapport with national governmental and financial institutions can create an enabling environment of locally-led CVA.** In Türkiye, one actor stated that the Turkish government trusts local NGOs, such as the Turkish Red Crescent (TRC), and have long standing relationships with the Turkish banks. With international financial support and local confidence, the TRC has led local CVA during emergency responses.

**Governmental and donor policies also can dictate the opportunities for locally-led approaches.** In Syria, the government requires the international community to work with local actors. As a result, international actors are expected to partner with local agencies to gain access to the country. A FCDO-funded project on food security and social protection required the consortium to establish a localisation strategy outlining the transition leadership to local actors within a five-year time frame. These policy commitments, from either the government or donors, can lead to observable power transformation. However, these mandates must include requirements on equal partnership and local leadership.

**Locally-claimed coordination groups such as the Network for Empowered Aid Response (NEAR) create the opportunity for local actors to advocate for more fair funding and structural changes to the humanitarian system.** NEAR describes themselves as “a movement of local and national civil society organisations (CSOs) from the Global South rooted in our communities who share a common goal of a fair, equitable and dignified aid system.” Through membership, local actors can advocate for changes within the international system. NEAR engages directly with institutional donors to provide access to funding opportunities, creating an avenue of funding usually inaccessible to local actors. While none of the respondents in this research mentioned NEAR, CALP (and the NEAR website) confirmed membership of local actors from the MENA region and NEAR’s potential to support the advancement of locally-led CVA. International organisations should acknowledge and collaborate to support the growth of these locally-led initiatives.

## 6.8 WHAT ARE THE PROPOSED SOLUTIONS FROM DIFFERENT STAKEHOLDERS ON IMPROVING LOCALLY-LED RESPONSES TO CVA IN MENA?

All respondents were asked for potential solutions to increasing the implementation of locally-led CVA in MENA. International actors, including INGOs, UN actors, consortia and donors focused their recommendations on capacity strengthening and elevating the existing strengths of local actors. Local actors advocated for more choice and ownership in building their systems but overall voiced the need for international actors to provide funding space. The details to these solutions are detailed below.

### INTERNATIONAL ACTORS, CONSORTIA AND DONORS

Several international actors, at both regional and country-level, recommended the development of **strategies related to localising CVA across MENA and shifting power from international to local actors.** A UN actor emphasised how any new strategy related to locally-led CVA should have “indicators, milestones and monitoring”. One international actor suggested that INGOs and the UN agencies need

to develop an exit strategy: "... what is needed is to create plans of phasing out and help local actors to systemise. We are allowing them to rely on our systems". However, as discussed above, the true commitment and motivation to localisation of CVA remains lacking in several organisations.

Connected to this, interviewees recommended that existing examples of locally-led CVA approaches are **mapped out across the region**. Key informants from UNRWA, DRC and PIN suggested this was a key step their organisation should take to make progress towards locally-led CVA. Additionally, DRC and PIN indicated that the CWG in both Yemen and Syria could take active roles in spearheading this assessment. The objective of this exercise would be to create a baseline with which it will be possible to measure the progress of local actor empowerment and growth of locally-led response.

Some international actors recommended an increased role for both themselves and their INGO or UN agency in capacity building for local actors. Presently, differences in skills and knowledge between local and international actors create power imbalances. In some contexts (namely Iraq and oPt), it was suggested CWGs should have more capacity building in Arabic. FCDO, for example, has plans to continue its work strengthening the capacities of the Ministry of Social Development in Jordan.

**Importantly, stakeholders commonly agreed that initiatives to strengthen systems within national governments and local organisations were more effective than skills training for individuals.** With improved organisational structures and systems, local actors including FSPs, governments and national NGOs are more likely to meet the accountability, data protection and security requirements of the international community. This type of capacity building also invests in the organisation, rather than individuals who may eventually leave these local agencies.

In Iraq, Syria and Türkiye, international stakeholders emphasised how successful CVA localisation is dependent upon local actors adopting **a humanitarian-development-peace nexus approach**. This approach was perceived as an avenue for local NGOs to access funding and improve their relevance from a donor perspective. In the words of one Syria-based, international respondent, "local actors need to shift towards sustainable, longer-term interventions instead of aid covering basic needs".

**A few international actors advised that the international sector should support local stakeholders in becoming specialised actors in CVA.** These professionals recognised that small organisations may not have the capacity to run a country-wide CVA programme. Elevating their existing strengths and contextual knowledge, local actors should redefine themselves as a specialist in delivering CVA in a particular context. Respondents thought this approach could support innovation and create space for local actors to develop new ideas for CVA while also reducing barriers to funding opportunities. Ideally, NGOs' specialisation would also encourage the international sector to engage with a diverse number of local stakeholders rather than only a few. In order for this approach to locally-led CVA to be successful, the sector must recognise the value in specialisation over generalised 'one-stop shop organisations' and drastically shift from its current model as described by Cabot Venton and Pongracz (2021).

## LOCAL ACTORS

Several local actors recommended **conducting their own capacity assessments**. One local actor interviewee argued, "... we need to be specific and we need self-assessment to define our needs. Whenever an international NGO or donor is asking to help, we know what to answer. And I just say that tell them we need capacity strengthening in what specific areas". Another interview participant argued that capacity self-assessments will enable local NGOs to evidence high levels of capacity, "... donors should create capacity

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assessments to objectively understand and prove that local actors can already manage, implement and reach the target population, and have an ability to build and expand capacity (people, staff, tools, human resources, systems) even further ...". In addition, self-assessments from local NGOs could challenge hidden bias from international actors and highlight key strengths of local actors. This would further allow actors to claim a space in CVA and ownership over strengthening their organisations.

In relation to this, local NGO stakeholders also recommended **the development of organisational plans** for discrete periods of time. As one respondent argued, "... local NGOs having a clear strategy for five years gives us more credibility to approach donors and international NGOs and asking for help when we say that we have capacity in this area and we need capacity strengthening in another area ... we cannot just say we need support in everything from financial help, procurement, SOP development to policies for CVA". By institutionalising leadership into organisational strategies, local actors can claim a space in the CVA ecosystem while creating visible power structures to support their leadership.

Local actors recommended initiatives to improve capacity and skills related to the digital transfer of CVA. This was particularly the case in Yemen and Iraq where training for e-vouchers and e-payments was requested for staff of local NGOs and programme participants.

Some local actors endorsed **the need for advocacy to end negative stereotypes associated with locally-led CVA**. These biases undermine efforts to shift leadership towards local actors, and reinforces inequalities between local and international agencies. Several individuals complained that local organisations were unfairly stigmatised and associated with corruption due to the misconduct of others. A local humanitarian in Iraq said that ... the mentality of international organisations should change, although not all local NGOs are angels ... the problem is that none of us are trusted. The bad reputation of one or two organisations should not taint the trustworthiness of all local actors.

**Local actors voiced the need for INGOs and funding institutions to create inclusive funding models for local actors.** This may require simplifying funding regulations and creating fair funding mechanisms. One Iraqi-based colleague reported, for example, that: "... I would recommend ending unfair payments to local NGOs. Sometimes international organisations are greedy. They want to take whatever they can. Perhaps they are given US\$1,000,000, and they pass on only US\$200,000 to the local partner ... I think the local organisations should stand up for themselves and reject this because, we should all be treated equally and fairly based on the quality of our proposal and services".

**Several international and local respondents emphasised that the existing structure and mentality around humanitarian aid must drastically change to increase the leadership of local actors.** One actor highlighted that UN agencies and INGOs need an end goal of handing over all operations to local actors, either governmental or non-governmental. Another international player suggested that these international organisations should transition to a facilitation role in which they provide a common space for local actors and donor institutions to interact. The international NGO or UN agency could hold responsibility for accountability and data protection for the local actors, but ideally all programmatic decisions should reside with the local stakeholders.

**Local actors voiced the need for INGOs  
and funding institutions to create inclusive  
funding models for local actors**



# 07

# CONCLUSION AND RECOMMENDATIONS



Engaging both local and international humanitarian professionals, this research captured perspectives regarding the existing barriers and moments of progress towards locally-led CVA in MENA. Overall, there remains limited policy and country strategies dedicated to the advancement of locally-led responses to CVA. Unconscious bias, internalised perceived hierarchies between actors and competition over funding has created fundamental challenges towards localisation and reinforced existing power dynamics. However, most international respondents recognised these systematic issues and recommitted themselves to create actionable change towards locally-led CVA.

The following recommendations are based on the findings.



## FOR INGOS, UN AGENCIES AND CONSORTIA

- 01 International actors need to create public action plans to institutionalise and operationalise localisation policies with specific attention to CVA. These plans should include baseline mapping of existing locally-led responses and identify indicators to hold international organisations accountable to their commitments. These metrics should clearly demonstrate progress in increasing leadership to local actors, e.g. transfer a percentage of programme responsibilities and key decisions (if not all) to local actors; and designate a specific percentage of flexible and unrestricted funding to local networks. This may demand international actors to redefine their responsibilities within CVA and acknowledge how they can better provide consultative or technical expertise while enabling local actors to lead decision-making on project design and implementation. This could include re-characterising themselves as 'knowledge brokers', or service providers which contribute to technical expertise in funding opportunities, accountability and/or the latest global information on cash programming.
- 02 Inter-organisational bodies, such as coordination groups, consortia and cash working groups, must adopt inclusive operational guidelines to create space and leadership of local organisations. These bodies must ensure their practices support and align with existing locally-led coordination structures. At minimum, these coordinating groups should conduct meetings in Arabic – or the most culturally relevant language for local actors – and co-leadership from multiple local stakeholders. In addition, these coordinating groups should facilitate baseline reports on locally-led responses in the area, assess what specific barriers may exist for local actors in participating in these groups, and evaluate whether their current processes create a safe and friendly space for these stakeholders to voice their opinions.
- 03 Coordination and CWGs should hold learning workshops to share the success of existing locally-led mechanisms, including those established during the onset of emergencies. These opportunities must create space and source financial resources for local actors or locally-led coordination groups to disseminate their own expertise more broadly. These workshops should explore how the international community and local actors can continue these locally-led models from emergencies into early recovery and development approaches.
- 04 International organisations must demand and collectively advocate for financial institutions to facilitate more collaborative funding models and increase accessibility of funds to local actors. Actionable steps would include facilitating direct conversations between donors and local actors, accounting for indirect costs for local actors into proposals, promoting alternative and innovative project design, and ensuring contract provisions include local agencies in leadership positions for the project design and delivery.

- 05 The international community – led by local actors demands and needs – must financially invest in local systems strengthening processes. This would include facilitating locally-led capacity assessments to identify the strengths of local agencies, and identify where international technical support can be provided.
- 06 International actors must challenge existing unconscious bias within their organisations and the humanitarian system. This could include adopting anti-racist policies, decolonisation policies, inclusive hiring processes, equitable partnership guidance and creating safe space for local actors to share their experiences and voices directly. Senior leadership must embrace this to create organisational change.



## FOR FUNDING INSTITUTIONS

- 07 Donors must revise their internal processes to create flexible and fair funding streams accessible to local actors. This could include redesigning risk frameworks and procurement policies, and creating standardised compliance mechanisms across the sector. Funding teams could initiate more direct relationships with local actors, local networks and identify opportunities exclusively for local organisations.
- 08 Donors, funding institutions and consortia should require INGOs to include localisation strategies and local leadership within their project proposals. Creating a locally-led mandate in the access to funding streams will push international organisations to establish more concrete policies and commitments towards locally-led CVA.



## FOR LOCAL ACTORS

- 09 Local actors should claim their own coordination spaces, either through the membership with collectives such as NEAR or by establishing nationally-led inter-organisational bodies as demonstrated in Iraq and oPt. These groups should meet regularly to establish common strategies to locally-led CVA and build internal CVA expertise at a local level. Collectively, these local actors can strengthen their coordination while advocating for reform within the humanitarian sector towards locally-led approaches.
- 10 National governments should create regulations and policies that require international actors to create equal partnerships centred on local leadership. While political contexts will affect the practicality of this recommendation, international actors should acknowledge any existing bias, and support where national governments can and should play this role.



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# ANNEX I

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# ANNEX 2

## DATA COLLECTION TOOLS

### KEY INFORMANT INTERVIEW GUIDE

#### INTRODUCTION

Hi everyone. Thank you very much for your availability for this call. My name is ... and I am (position, organisation, program) and with me are "x" + (position), "y" (if applicable, position), etc. This key informant interview is part of a research consultation for the CALP Network in the Middle East and North Africa (MENA) region. The CALP Network, a global network of over 90 organisations, works to improve the quality and scale of humanitarian cash assistance through guidance, research, learning activities, trainings and working groups.

The objective of this research is to identify the key barriers and opportunities of locally-led responses to cash and voucher assistance (CVA) in the MENA region. Key informant interviews will help us collect evidence and shared knowledge about locally-led CVA and improve understanding of the impact of existing policies and strategies towards localisation in the sector.

The data collected during this interview is strictly confidential and will be consolidated into a written report. In cases where quotes or personal reflections are used, the data of the person interviewed will be modified to protect their identity. In accordance with EU Global Data Protection Rules (GDPR) and AAH UK's Data Protection Policies, any personal data collected will be stored on a password protected computer and server. Files will only be accessible to the researchers and commissioning CALP team. At the end of the project, all personal data will be deleted.

Based on this information, do you agree to participate in this interview? Can we record the interview?

Thank you for agreeing to participate and giving your time for this interview!

#### FOR DATA COLLECTION TEAM:

- Obtain informed consent (either written or recorded) from the participants.
- Take note of the comments and reactions of participant.
- Record the call or meeting to listen to it and analyse it later.
- Do not generate expectations of the call (that is, make it clear that participation does not imply additional assistance).

#### INTERVIEW DETAILS

DATE	
PLACE	
STARTING TIME	
ENDING TIME	
PERSON TAKING THE INTERVIEW	
NAME OF INTERVIEWEE	
NAME OF ORGANISATION	
AUTHORISATION	YES / NO

## QUESTIONS

### International Actor (UN System, INGO, CALP)

- 01 Can you please introduce yourself, your position and your organisation's role in cash and voucher assistance?
- 02 How would you define "locally-led" cash and voucher assistance (CVA)? What do locally-led responses look like in practice?
- 03 What are the strengths of locally-led CVA?  
(probe: strengths/weaknesses, understand what are their motivations)
- 04 Does your organisation have a strategy, policy or guidance on localisation of CVA? What does it include?  
(probe: linked to social protection strategies?) If not, why not?
- 05
  - a If yes, to 4: To what extent, do you believe these policy commitments/strategies have led to actionable steps (i.e. operationalised)? (e.g. partnering with more local NGOs/governments? Increased FSPs? More funding for local actors? Local actors involved in decision-making?)
  - b If no to 4: Do you have actionable steps that your organisation takes to engage with or partner with local actors? (probe: current best practices?)
- 06 Have these strategies led to any structural or organisational change?  
(skip if no KII indicates no organisational policy/guidance)
- 07 To what extent, do these strategies/policies connect to social protection/social assistance in the region?  
(government safety nets?)
- 08 Do you have examples of good / successful locally-led CVA responses in the country?
- 09 What barriers have prevented the advancement/expansion of locally-led responses into operations?
  - a What are the financial and resource barriers to locally-led responses?  
(e.g. funding requirements make it hard to partner with local actors; technical expertise of partners)
  - b What are the legal or political barriers within the humanitarian system that restrict locally-led responses?  
(e.g. legal requirements from EU that partners are GDPR compliant)
  - c What are the cultural/contextual/historical factors that restrict locally-led responses?  
(probe: what are the rooted causes of these barriers, what are detailed examples of these barriers?)
- 10 How are local actors included in decision-making processes during the CVA project cycle?  
How can this be improved?
- 11 Do you participate in any cluster/ cash working group / multiple stakeholder coordination groups related to CVA? To what extent do local actors participate in these groups? Why/why not?  
(probe if CWG lead etc. What steps are taken to involve local stakeholders?)
- 12 What are the proposed solutions to strengthen locally-led responses to CVA?  
(probe: what types of resources? Coordination? Relationship building?)
13. What are the key enabling factors and potential opportunities for advancing localisation or working with local actors in CVA?
- 14 What are the key steps you think your organisation can take to improve locally-led responses to CVA?
- 15 What would you need to see in terms of systematic/operational change to partner with or fund local NGOs?
- 16 What are your recommendations for the sector to improve the actions towards locally-led responses?
- 17 Do you have any additional comments to make regarding the progress of locally-led responses to CVA in MENA?



## Donors/Consortium Members

- 01 Can you please introduce yourself, your position, how long you've been in this role and your organisation's role in cash and voucher assistance (CVA)?
- 02 How would you define "locally-led" cash and voucher assistance (CVA)? What do locally-led responses look like in practice?
- 03 What are the strengths of locally-led CVA?  
(probe: strengths/weaknesses, understand what are their motivations)
- 04 Does your organisation have a strategy, policy, guidance or other actions taken to support localisation or CVA? What does it include? (**probe: any strategies for fair funding models**)
- 05 Have these strategies led to any structural or institutional changes in your organisation?
- 06 To what extent, do these strategies/policies connect to social protection/social assistance in the region?  
(*government safety nets?*)
- 07 What do you perceive to be the main barriers to locally-led CVA? How have these barriers prevented the translation of policy commitments into operations?
  - a What are the financial/resource barriers to locally-led responses?
  - b What are the political and legal barriers within the humanitarian system that restrict locally-led responses? (**probe: what are the rooted causes of these barriers, what are detailed examples of these barriers?**)
- 08 How are local actors included in decision-making processes (*including funding requirements/monitoring*) during the CVA project cycle? How can this be improved?
- 09 Do you participate in any cluster/ cash working group / multiple stakeholder coordination groups related to CVA? To what extent do local actors participate in these groups? Why/why not?  
(**probe if CWG lead etc. What steps are taken to involve local stakeholders?**)
- 10 What are the proposed solutions to strengthen locally-led responses to CVA?  
(**probe: what types of resources? Coordination? Relationship building?**)
- 11 What are the key enabling factors and potential opportunities for advancing locally-led responses?
- 12 What are the key steps you think your organisation can take to improve locally-led responses to CVA?  
(*e.g. steps to creating more fair funding mechanisms*)
- 13 What would you need to see in terms of systematic/operational change to partner with or fund local NGOs?
- 14 What are your recommendations for the sector to improve the translation of policy commitments to locally-led responses into operation?
- 15 Do you have any additional comments to make regarding the progress of locally-led responses to CVA in MENA?

## Local Actors (NNGOs, government, FSP)

- 01 Can you please introduce yourself, your position, how long you've been in this role and your organisation's role in cash and voucher assistance (CVA)?
  - 02 Can you describe how you work with other stakeholders (*e.g. INGOs, UN actors, government, other local actors*) to deliver CVA?
-

- 03 How would you define “locally-led” cash and voucher assistance (CVA)?  
What do locally-led responses look like in practice?
- 04 What are the strengths of locally-led CVA?  
*(probe: strengths/weaknesses, probe to understand what are their motivations)*
- 05 What other local actors do you work with to support your efforts in CVA?  
*(probe for government: how does this involve local NGOs?)*
- 06 To what extent, do you feel INGOs are doing enough work towards engaging local actors in CVA?
- 07 With your CVA programming, to what extent is it linked to or supportive of government safety nets?  
*(probe perceptions of this?)*
- 08 Have you seen a change in locally-led responses in CVA in the last 5 years? Why or why not?  
*(probe: any key examples of locally-led responses best practice?)*
- 09 To what extent do you participate in any cluster/ cash working group / multiple stakeholder coordination groups related to CVA? Why/why not?
- 10 To what extent, do you feel local actors are included in decision-making processes during the CVA project cycle? How could this be improved?
- 11 What are the key barriers to the implementation locally-led CVA? What are the solutions to these barriers?
- a What are the financial/resource barriers to locally-led responses? *(probe: barriers to fair funding models?)*
  - b What are the legal or political barriers within the humanitarian system that restrict locally-led responses?
  - c What are the cultural/contextual/historical factors that restrict locally-led responses?  
*(probe: what are the rooted causes of these barriers, what are detailed examples of these barriers?)*
- 12 What are the enabling factors and potential opportunities for the expansion of locally-led responses in X  
*[interviewer: insert as applicable] country?*
- 13 What is needed from funding actors to create fair funding and/or increase funding accessible to local actors in MENA?
- 14 What does your organisation need from your partners and the sector more widely to strengthen your locally-led responses to CVA?
- 15 Do you have any additional comments to make regarding the progress of locally-led responses to CVA in MENA?
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## ANNEX 3

### LIST OF COUNTRY REPRESENTATION

#	COUNTRY	ORGANISATION	TYPE
01	Iraq	World Food Programme (WFP)	UN
02	Iraq	People in Need (PIN)	INGO
03	Iraq	Asia Pay	Local (FSP)
04	Iraq	Asia Pay	Local (FSP)
05	Iraq	International Organisation for Migration (IOM)	UN
06	Iraq	Ankawa Humanitarian Committee (AHC)	Local (NGO)
07	Iraq	Aid Gate Organisation	Local (NGO)
08	Iraq	Zain Cash	Local (FSP)
09	Iraq	Zain Cash	Local (FSP)
10	Iraq	Mercy Hands	Local (NGO)
11	Iraq	Mercy Hands	Local (NGO)
12	Jordan	ECHO	Donor
13	Jordan	WFP	UN
14	Jordan	FCDO	Donor
15	Jordan	National Aid Fund (NAF)	Local (govt)
16	Lebanon	Million Bridges	FSP
17	Lebanon	UNHCR	UN
18	Lebanon	Ministry of Social Affairs	Local (govt)
19	Lebanon	Lebanon Red Cross	Local (NGO)
20	MENA	CALP	INGO
21	MENA	UNRWA	UN
22	MENA	UNICEF	UN
23	MENA/NW Syria	GOAL	INGO
24	oPt Gaza	Gaza protection consortium	Consortia
25	oPt Gaza	Women's Affairs' Centre (WAC)	Local (NGO)
26	oPt Gaza	Union of Agricultural Work Committees (UAWC)	Local (NGO)
27	oPt	Action Against Hunger	INGO
28	Syria	Caritas Switzerland	INGO
29	Syria	Caritas Switzerland	INGO
30	Syria	PIN	INGO
31	Türkiye	UNHCR	UN
32	Yemen	DRC	Donor
33	Yemen	OCHA	UN
34	Yemen	Safer Hands Yemen	Local (NGO)
35	Yemen	Safer Hands Yemen	Local (NGO)

