Going the extra mile!

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Global Mentoring Initiative
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This report is the beginning of a conversation, not the end of it.
Going the extra mile!

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As a member of a team working under the aegis of the 2005 Tsunami Evaluation Coalition, Smruti focused on the impact of the international response on national capacities. She worked for five years with the Humanitarian Accountability Partnership; in 2015 carried out a study for SDC on the capacity needs of local Syrian NGOs operating out of South Turkey. In the run up to the World Humanitarian Summit, she conducted extensive consultations with some 260 national NGOs across Asia, Africa and Lebanon regarding both their priority concerns and their relations with international relief agencies. Smruti participates in the IASC Financing Task Team and is a member of the IASC Accountability to Affected Populations and PSEA Task Team. She is a regularly invited to events on ‘localisation’ in an expert capacity. Through her Global Mentoring Initiative, she seeks to promote a more comprehensive approach to organisational capacity development, with a stronger role for mentoring & accompaniment beyond training events.
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Smruti Patel
1. The Bangladesh Field Visit

Bangladesh is exposed to a wide range of disaster hazards, and is consistently ranked amongst the most vulnerable countries in the world, because of a ‘disastrous combination of extreme exposure and high vulnerability’. This stems largely from its position and geography. Furthermore, Bangladesh is rated as the nation most vulnerable to global climate change, with the coastal areas predicated to be most vulnerable, increasing the impact of future disaster events. Bangladesh is seen as an example of the gains that can be made when a government commits to investing in Disaster Risk Reduction.

Civil society actors have played a central role in the development of post-independence Bangladesh. Often cited internationally as a model for the positive role that civil society can play in development, the civil society sector here is neither homogeneous nor without divisions, but instead consists of a broad range of actors collaborating and competing for their stake in the future of the country. International aid agencies have been present in Bangladesh for many years, with some Start Network members since independence.

The Start Fund has financed responses to three alerts between August 2014 and August 2016. Two alerts were related to flooding, and one alert to a cyclone. A short field visit to the country provided an opportunity to better understand how the Start Fund members operate in this setting. It helped to develop a perspective on how current practices, which are partially but not solely, shaped by Start Fund policies and procedures, relate to ‘localisation’. It also provided a richer opportunity to hear the experiences and perspectives of national and local agencies, and listen to some of the communities who benefitted from Start Fund relief.

In addition, discussions are currently under way to establish a ‘national level Start Fund/Window’, i.e. a country-level pooled fund operated by the Start Network and according to its principles. Conversations about its design and procedures had not yet fully started at the time of the visit (15-25 January 2017), so recommendations on this issue are intended to contribute to the ongoing work.

2. Methodology

DOCUMENTARY REVIEW:
Related to the three alerts and responses (flooding in 2014 and 2016; a cyclone in 2016). This included alert forms, Start Fund Committee (previously called Allocation Committee) minutes, project proposals, Project Selection meeting minutes and summary, recorded meetings/conversations (Zoom), project reports and learning reports.

DHAKA ENCOUNTERS:
One-to-one and small group meetings took place with staff of Start Network member agencies and some of the Bangladeshi NGOs that have been involved in the responses and/or take part in a Start Disaster Emergency and Preparedness Portfolio (DEPP) project. Some individual conversations had to happen by phone.

A half day workshop was also organised with national NGOs (NNGOs) and local NGOs (LNGOs), most of which are not connected to the Start Network. The focus of the workshop was on partnerships, funding opportunities and challenges for NNGOs and LNGOs in responding to communities in need. This is relevant for various reasons:

• A national level Start Fund becomes part of a national ‘infrastructure’ or ‘system’ for disaster management. Therefore, other actors and stakeholders in that ‘system’ or ‘landscape’ are interested in this. Given the Start Fund’s niche on fast but also very time-bound response, it cannot fund further actions to address ongoing needs. Non-members may have ideas and suggestions to maximise the added value of a national level Start Fund.

3 Bangladesh: understanding humanitarian networks, ALNAP Case Study, Kim Scriven, 2013
• There are Bangladeshi NGOs that are not connected to the Start Network via its members, but who do respond in crises. The Start Fund seeks to ‘connect crisis-affected people to the best possible solutions’. It cannot assume that the ‘best possible solutions’ can only come from its members and their network;

• Currently non-member Bangladeshi NGOs might become interested in applying for full membership of the Start Network, or a new type of national-level ‘membership’ that would allow them access to the ‘national level fund’, if such modality would emerge.

AFFECTED AREA VISITS & COMMUNITY CONSULTATIONS:
The focal points of the member agencies that received the funding, were instrumental in organising a field visit. Discussions led to the choice of Kurigram and Ghaibantha, two locations in the north. They had been affected twice by flooding (2014/2016) and in both instances received Start fund-ed assistance. Logistically it was also not possible to travel to both in the time available. That intensive five-day field visit provided the opportunity to listen to field-level staff of member and collaborating agencies, to local authorities and affected communities.

CONSTRAINTS:
The question which country or countries to visit for this exercise, continued to be discussed for several weeks in late 2016. Different countries appeared and disappeared as candidates for a variety of good reasons. When the decision then fell for Bangladesh, the trip had to be organised in a short timeframe. Not all focal points of the Start Network members in Bangladesh managed to make themselves available. One meeting was held over dinner with nine focal points of International NGOs INGO members. Security concerns and travel times needed, meant that the cyclone-affected area could not be included. Due to the same time and security constraints, only two project sites of Christian Aid’s partner agency were visited and one of Caritas Bangladesh. There was no time to carry out one-to-one interviews with community members. It was not possible to visit or talk to Start Network member agencies who had implemented programming directly because of lack of availability and because it was long after the response, so some of the staff no longer worked for the organisation. It would have required special effort to get them together for a meeting and would have increased the cost of the field visit.

CONFIDENTIALITY:
All participants in the conversations were reassured about confidentiality of the information to create a safe environment to share their views honestly and openly. Permission was also attained to record the conversation as memo aid, however, interlocutors were reassured these recordings would not be shared. Some participants voiced a concern about being named in case it might have repercussions on the relations between them and their INGO partners, and future funding from them. They were reassured that the issues identified and quotes would not be attributed by name.

BALANCE OF VIEWS
As the diagram below shows, many more NNGO staff were interviewed than INGO staff because the programmes visited were implemented by NNGOs. It was felt that their input was crucial to the localisation discussion, as often their voices are not heard. In the documents shared by the Start Fund their views are not systematically documented.
3. A Framework to understand ‘Localisation’.

This report presents a ‘baseline assessment’ of where the Start Fund currently is on the ‘localisation agenda’ in Bangladesh with recommendations on how to move forward to achieving that objective and setting up the new country level Start Fund there.

‘Localisation’ is a vague term. To answer the question, we developed a framework that is more comprehensive than what was available. We also had to look beyond the Start Fund. We looked also at the Start Network, because that is where localisation is actively discussed, where public statements are made, and where other strategies are pursued, notably the intended expansion of Start Network membership with more national NGOs. The decisions about setting up the national fund also take place at Start Network level. Directed by many interlocutors, we also considered a relevant DEPP project: Shifting the Power. This focuses on more structural capacity-strengthening of national actors. While the field visit was conducted and the report written, discussions on the national Start Fund continued.
3.1 THE PROBLEM-STATEMENT AND THE END-STATE?

A fundamental question that needs to be addressed is: What problem is ‘localisation’ supposed to mitigate? Different answers lead to different interpretations. These in turn lead to different strategies and eventually different outcomes or end-states. Our scan brings out seven ‘problem statements’ about the current state of the ‘international humanitarian system’ and its prevailing practices.

What ‘problem’ does localisation address?

For the sake of clarity, we differentiate between two interpretations and recommend discussing them separately: if we focus on the problems on the left, then ‘decentralisation’ can be an effective remedy. If we focus on the problems towards the right, then we need more fundamental ‘transformation’.

**The decentralisation interpretation** focuses strongly on the ‘centralisation’ problem, and acknowledges the need to try and be more costs-effective. Under this interpretation, ‘localisation’ can be achieved if strategic, operational and financial decisions are made close to the at-risk or affected areas, and if 25% of financial resources go ‘as directly as possible’ to ‘local actors’, i.e. in proximity to the crisis-area, irrespective of who they are. In this interpretation, more direct funding of the nationally registered offices of international agencies and/or the national affiliates of international alliance, counts as contributions to the 25% objectives. This interpretation takes a more technical-operational perspective. Inasmuch as it considers ‘power’, it looks mostly at the distribution of ‘power’ between ‘HQ’ and the regional/country offices. In case of Bangladesh the decision making being decentralised from global level to staff of member agencies based in Bangladesh.

**The transformation interpretation**, acknowledges the ‘problems’ on the left, but pays full attention also to those on the right. It sees ‘localisation’ success in terms of much stronger national capacities and leadership. Strategic, operational and financial decisions are made by undisputedly ‘national’ actors (governmental and non-governmental), in support of 25% of the available international resources going directly to them. Proponents of this interpretation take a broader historical and systemic view. They argue that the dominating presence of international agencies are one of the important obstacles to national leadership and building strong and sustained national capacities. ‘Transformers’ are concerned that ‘localisation’ as ‘decentralisation’ actually turns into an incentive to accelerate the ‘multi-nationalisation’ of INGOs: creating more and more...
‘national’ offices and national ‘affiliates’, that sooner or later will also compete in fundraising from the domestic market. This does not diversify the eco-system, because there is no level playing field for those who don’t have these structural international relations. Increased competition in the domestic market will further reduce the space, especially for national civil society organisations (CSOs), who are already under financial and sometimes political pressures.

The Start Network acknowledges there is a problem. Four concepts appear repeatedly in its communications related to the vision of a better state of affairs: decentralisation, diversity, subsidiarity and more balanced humanitarian economy. But we haven’t found clarity around two key questions:

1. Why is the ‘humanitarian economy’ unbalanced in the first place?
2. What, in practice, will a more ‘diverse’ and ‘balanced humanitarian economy’ look like?

We anticipate further debate also within the Start Network on this issue. This continues a longer-standing discussion within the Network about its primary purpose, whether or what transformative change is part of that, and if so, at what pace. This discussion should not take place in generic terms: in certain places the conditions for transformative localisation are much better than in other places.

Bangladeshi NNGOs are also taking part in some of these discussions at international level. A few leading agencies had a strong presence in the consultation at national level and in the regional process leading up to the World Humanitarian Summit, advocating for more equitable humanitarian system.4

3.1 The Seven Dimensions of Localisation.

The best-known localisation marker is the 25% referred to in the Grand Bargain. But broader inquiry, also among NNGOs, brings to the fore seven dimensions of localisation. We recommend that these in future are all taken into consideration.

We assessed where the Start Fund currently is on these seven dimensions. The data or documentation collected by the Monitoring, Evaluation, Accountability and Learning (MEAL) Team that work with the Start Fund, have been developed mostly for different purposes than tracking ‘localisation benchmarks’. It is therefore not possible to draw robust ‘evidence’ from the available data, many of which are also qualitative (or silent) on the issues that matter most for ‘localisation’. One output of this exercise (see the main report) is the indicators and benchmarks on ‘localisation’, that the Start Fund and Monitoring, Evaluation, Accountability and Learning (MEAL) Team may wish to start tracking more systematically in future. Reference to these benchmarks will also assist in the set up of the national Start Fund in Bangladesh.

4 Making Humanitarian and Development Activism Localised and Accountable, 7 Initial Accountable Proposals on Reshaping Aid, October 2015
3.2 The Start Network & Localisation

Below are key public commitments to localisation from the Start Network, within which the national funds inscribe themselves.

**BOX 1: THE START NETWORK & LOCALISATION**

*Localisation is a foundational and non-negotiable principle within the Start Network. Local nodes will have sovereignty over their decisions, local management of resources, and the right to develop their own financial innovations. They will receive the support necessary to achieve this in exchange for taking on the obligations necessary to spread Start Network values more widely.*

*Start Network Vision document - Nov 2016*

*Today some 50% of Start Fund grants are implemented by national NGOs acting as subcontractors to Start Network Members. While this partnership between national and international NGOs provides considerable value and resilience to the system, we will go further, and ensure that 25% of Start Fund grants by 2020 will be directly implemented by national Start Network Member NGOs– without the need for subcontracting*

*Start Network statement to the World Humanitarian Summit 2016*

*The Start Network wants to harness the strength of this civil society pillar, to work with the rest of the sector and beyond, to embrace the move toward disintermediation and new ways of working in the most effective way.*

*Membership Information Pack 2015*
4. Start Members and Localisation Discussions in Bangladesh

4.1 Start Members in Bangladesh

Twenty members of the Start Network have a presence in Bangladesh. Most have been working in Bangladesh for many years, typically over 20, with some for over 60 years since its independence. Most are registered with the authorities and some are going through a “complicated” registration process. Most work on development and poverty reduction programmes and only in more recent years have been involved in disaster risk reduction responses. Some have huge offices in Dhaka and field presence at district, Upzala and union level, with over a 1000 staff.

The members have different operational modalities. Some always implement directly through local staff in branch offices in different parts of the country. Their own staff numbers therefore are large. Some only work through and with Bangladeshi NGOs and never go operational. Others implement directly but also work with or through local agencies.

4.2 The ‘Localisation’ Conversation in Bangladesh

As stated above, a number of Bangladeshi NGOs have been part of the dialogue on localisation during the regional WHS consultations process. Conversations about ‘localisation’, have been happening more regularly among Start members in Bangladesh for the last two years. The conversations took on a different quality when DEPP’s ‘Shifting the Power’ project came to Bangladesh in 2015. The stated aim of ‘Shifting the Power’ is “to support local actors to take their place alongside international actors in order to create a balanced humanitarian system. It will strengthen local and national organisational capacity for decision-making and leadership in humanitarian response, support local organisations to have greater representation, voice and recognition in relevant networks and platforms, and at the same time influence international organisations to promote the role of local and national actors.”

The national focal point of INGO explained that it came at a time when some INGO members were experiencing funding problems. Donors were partially shifting from aid to trade mode, and Brexit then affected the value of the Pound Sterling and raised concerns about future access to funding from the European Civil Protection and Humanitarian Aid Operations (ECHO). ‘Shifting the Power’ was perceived as a radical shift from INGOs to local organisations, with the latter taking the lead and INGOs becoming irrelevant.

“When initially the Shifting the Power project started, it created a big flutter.” (INGO staff member)

A conversation with 11 Start member focal points, made it clear that they understand ‘localisation’ is about more than financial flows. One person said “We then started reflecting that actually, “sharing the power”, which creates a more diverse eco-system, in which different agencies have different spheres of power, which is equitable in power, is more what we are aiming for”.

There is also discussion about, “Who is a local or national organisation? If someone sitting in Dhaka claims to be a local NGO and they are 20 years old, we (INGOS) have also been around for more than 20 years so we should also be considered local.” The minutes of the Start member meeting on 22 February 2017, the first in a series to design a national Start Fund window in Bangladesh, state that, ‘local’ refers to international, national and local actors and agencies who have a presence in Bangladesh. It is recognised that ‘local’ has several layers, with diverse levels of capacities, and therefore there should be a continuous balancing between quality and inclusion.

As explained above the question of who is ‘national/local’ crops up in all current ‘localisation’ conversations and is a sensitive issue because it has influence on who can access the “25%” of internationally available relief funding that the Grand Bargain promised will go to ‘national’ and ‘local’ actors by 2020. The main report identifies the debate over the markers that would lead to the ‘national/local’ qualification. We believe this debate is beyond resolve. A more pragmatic approach is to aim for a more ‘diverse’ landscape of actors, which is the Start Network’s professed intent, addressing the NNGO demand for a ‘more level playing field’.

In any case, in light of the localisation discussions, one Start member in Bangladesh said that they are now actively reflecting and changing their business model from a very operational to partner oriented approach.

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5 Proceedings of meeting towards WHS Istanbul-2016, April 11, 2016.
6 For an introduction and some questions related to Shifting the Power, see Annex 7 of the main report.
5. The Start Fund and Localisation in Bangladesh

The seven dimensions above have been used to structure the observations relating to Bangladesh and in particular Start’s three responses there.

5.1 The Start Fund and the Quality and Quantity of Funding

The three alerts activated by Start Network members in Bangladesh between 2014-2016, have all been funded by the Start Fund Committee, to the cumulative total of £1.2 million.

The Start members said that the primary information on the disaster situation comes from member agency staff at field level or often from NNGO and LNGO ‘partners’. Then at Dhaka level the discussions take place mostly amongst international agency staff (Start member agency directors, the INGO emergency sub-committee, INGO forum, the Humanitarian Coordination Task Team) to get a fuller understanding about the situation. Start member agencies may or may not discuss among each other who among them will launch an alert. For the three alerts, these have been Christian Aid, Muslim Aid and CARE respectively.

Allocation decisions are taken at central level by the Start Fund Committee made of a rotating group of serving individuals from Start member agencies. If the decision is positive and the envelope (ceiling of the total amount from the central fund) decided, the member agencies in Bangladesh who are interested in submitting proposals have one day to produce/finalise those. A Project Selection Committee, again from the Start member agencies but now at country-level, peer reviews the proposals submitted and scores them for relevance/appropriateness, efficiency and effectiveness. In two instances, a group of Start member agencies applied as a consortium, twice with Christian Aid as lead agency. In such instances the overall budget applied for tends to get larger. The Project Selection Committee looks at the overall envelope/budget that is available and accordingly decides which projects to fund and for how much.

The diagrams below show the agencies whose proposals where funded and the amount allocated to each or each consortium.

**ALERT 12: HUMANITARIAN ASSISTANCE TO FLOOD-AFFECTED FAMILIES IN NORTHERN BANGLADESH**

This alert was launched on 26th August 2014 by Muslim Aid. The Start Fund Committee allocated £200,000 for the response. 13 members submitted proposals and four were awarded funding. The chart below shows the funding distribution between them.

**CHART 1: THE FUNDING DISTRIBUTION ALERT 12**

In their proposal both CARE and Oxfam mention working with their own staff and ‘partners’. These ‘partners’ are not named. Islamic Relief implemented directly through their field based offices and Christian Aid implemented through their partner agency GUK.
Alert 90: Emergency Assistance to Cyclone Roanu Affected Communities in Southern Coastal Bangladesh.

Christian Aid launched an alert on 22nd May 2016. The Start Fund Committee met on 23rd May 2016 and allocation of £500,000 was approved. Six members submitted proposals; the Project Selection Committee approved three. The chart below shows the funding distribution between the three proposals.

Four NNGO partners were involved in implementation of the projects. Christian Aid, Oxfam GB and Concern Worldwide submitted a proposal as a consortium and implemented the project through partners namely, Mukti, CODEC and YPSA; ACF worked with Muslim Aid (for Chittagong) and Mukti (for Cox’s Bazar). Save the Children worked with Resource Integration Centre (RIC).

Alert 100: New Assistance to Flooding-Affected Populations in Northern Bangladesh.

The monsoon season of 2016 started in June with heavy rains that slowly increased the water level of rivers. This, combined with the opening of the Gojaldoba barrage upstream, caused a spike in the situation with flood episodes at the end of July. An alert was raised on 1st August 2016 by CARE International. The Start Fund Committee allocated £500,000.

Nine proposals were received, some from individual members, while three were submitted by a consortium of member agencies. Four of the proposals were awarded funding by the Project Selection Committee. The chart below shows the funding distribution between the four awarded agencies.

Six NNGO partners were involved in project implementation. Save the Children implemented their projects with Mohideb Jubo Samaj Kalyan Samity (MJSKS) for Kurigram and Manab Mukti Sangstha (MMS) for Sirajganj. In the coalition led by Christian Aid, they worked with their partner Gono Unnayan Kendra (GUK), Action contre la Faim (ACF) partnered with Manob Mukti Sangstha (MMS) while Muslim Aid implemented directly through its branch office. CARE worked with Solidarity (Kurigram) and Gram Bikas Sangstha (Bogra). Caritas applied as a national member and implemented directly. Representatives of these partners were present at the consultation in Ghaibantha.
5.2 Findings and Observations Related to the Quantity and Quality of Funding

A. QUALITY OF THE PROJECT SELECTION DECISION PROCESS.

Once the alert has been raised and an allocation made by the Start Fund Committee at global level, a Project Selection Committee made up of members meet in-country. The proposal appraisal and selection process is guided by a protocol to ensure objective assessment of the proposals. Project Selection Committee members are from different members of the Start Network based in Bangladesh. The Start Fund team is also involved to provide guidance if there are questions on the process. The conversation is recorded by Zoom (virtual meeting software) to ensure transparency and accountability. Notwithstanding, concerns were expressed by some member agency staff (3) about possible bias. The perception that some Start members make informal agreements to support each other’s proposals. One member described it as “cartel-like” behaviour. This is difficult to verify, but it is in principle possible, and therefore merits further inquiry, perhaps also in other countries than Bangladesh. Similar observations about objectivity and independence have been raised elsewhere (e.g. in the L&E Committee Peer-Review of Bangladesh and Turkey Responses (and Nepal), minutes, January 14th 2014; the 2015 evaluation of Start fund-ed responses in flood-affected areas of Punjab and Sindh, which recommends that independents and technical specialists be part of the Project Selection Committee).

While this may be a concern for Start and its member agencies, is it relevant for ‘localisation’? Yes, when we consider the scenarios where some individuals from (non-member) NNGOs are becoming part of the country-level Selection Committees, as is happening, and/or when NNGOs apply to a country-level Start Fund. Fair, balanced and consistent appraisal and decision-making will be very important to ensure a more ‘diverse’ humanitarian economy, as is having enough trust in Start processes that more NNGOs may wish to become full Start Network members.

B. INFORMED DECISION-MAKING AND NEGOTIATION.

The senior level INGO staff involved in the project selection process, have a fairly good understanding about the Start Fund and its process. They confirmed that being actively involved in the process of reviewing proposals with the peer group had enhanced their understanding. They confirmed that more investment needs to be made providing information and briefing staff and partners on how the Start Fund works.

Beyond them, among lower level INGO staff and among the collaborating NNGOs, there is a lack of awareness or mixed understanding of the Start Fund processes and the Start Network. The conversations with NNGOs, including those that have been involved in Start-funded responses, showed:

• Little awareness about who is funding the Start Fund and how the Start Fund functions;

• They are not informed about the full project budgets. Sometimes NNGOs are involved in setting their part of the budget; other times they are told that funding has been obtained and how much they will get for the response. They are not aware of the 10% management fee that is part of every Start funded budget nor of the 1% learning budget. Management fees are not normally shared with ‘implementing partners’, though some cover some core costs but turn the flexible fee into earmarked budget lines. All NNGOs mentioned how valuable a flexible management fee would be to them as it would give them flexibility to cover the extra costs that often arise – even more so when proposals and budgets must be developed in a very tight timeframe. It would also help them too invest in capacity strengthening if required.

• Two Start members mentioned the short timeframe being a reason not to get partners involved in the budgeting process.

Not knowing such important financial information, puts partners in a weak position to negotiate with the member agency that asks them to be part of or even carry out the actual response.
C. WHAT GOES THROUGH, AND TO, COLLABORATING AGENCIES?

The proposals and reports for the three alerts signal that non-member collaborating agencies, typically Bangladeshi NGOs, played a major role in the implementation of most projects. More than eight partners were involved in three alerts. Not all partners are named, especially in Alert 12. Of those named, we can identify eight as non-member Bangladeshi NGOs. But we also know that Start members use the word ‘partner’ for any collaborative relationship, including between INGOs. The record therefore is neither precise nor complete. Furthermore, the budgets and reports do not separate what goes to the collaborating agency and what stays with the member agency. Tracking the financial flows becomes even harder when a proposal was submitted by a consortium of members, who then allocate the budget provided first among each other and then to their respective collaborating agencies. Simply tracking the amount that ultimately is transferred to the collaborating agency is also not enough from a localisation point of view: Precise tracking would need to differentiate between what ‘goes through’ and what ‘goes to’ the collaborator. In the new reporting format there is a section on the amount that is transferred to partners but information is optional. In the documents reviewed, some agencies have not provided this information. This poses a problem of consistent information in terms of tracking how much of the funds are being transferred to NGO partners.

D. ADDITIONAL FINANCIAL ISSUES.

Various other financial issues were highlighted in the conversations:

• **CASH-FLOWS AND EMERGENCY RESPONSE STAND-BY FUNDS:** While financial transfers to Start members in country happen very fast once an allocation is decided, there can be delays in the onward transfer (of part of it) to a partner agency. Because activities must start within seven days, they may have to advance cash, sometimes without a formal agreement yet being concluded. Some of the Bangladeshi NGOs, including several for whom saving-and-credit schemes are an important work stream, have a certain ‘emergency response’ budget at hand. But a wider survey by the Shifting the Power project globally, showed that 83% of the responding local organisations did not have their own reserve fund for rapid emergency response (Shifting the Power 2015: Year 1 Overview:9).

• **NGO IN-KIND OR FINANCIAL CONTRIBUTIONS:** The Start Fund procedures mean that proposals and budgets need to be put together very fast. It is not always possible then to fully factor in or accurately assess all and real costs of the response operation. There have been instances when collaborating/implementing NGOs had to mobilise extra staff, or added in some of their own funds. If these contributions are not reported subsequently, then financial reports underestimate the real cost of a response, and leave out the monetary value of the NGO contribution.

• **LEVERAGE ADDITIONAL FUNDING:** We did not (also) inquire about ‘additional funds’ and if such were leveraged thanks to the initial Start allocation. In the general documentation (at central level) there are several references to (INGO) members obtaining more funding, but we haven’t seen any references as to whether NGOs got additional funding, where from, and whether their involvement in a Start funded response played part in that.

• **‘AS DIRECTLY AS POSSIBLE’** is one of the important but ambiguous criteria of localisation as advocated in the Grand Bargain. The practical meaning of this is heading strongly towards the interpretation of ‘no more than one intermediary’ between the original donor and the field-level implementer. Various general and Start-specific considerations are at play here:
  - Cost-efficiency: Dis-intermediation reduces transaction costs, leaving more money for the final assistance point;
  - Transparency and accountability: Multiple intermediaries obscures who is responsible for constraining rules, regulations etc. It becomes easy to put the responsibility upwards to a previous layer. A single intermediary makes it clear who is responsible and accountable for exercising that role efficiently and effectively;
  - Donors want it: Our conversations with some donor representatives confirm this. The recent move of UK Department for International Development (DFID) and ECHO to have one intermediary handle their combined US $ 85 million for cash programming in Lebanon, is a clear sign too.
  - The Start Network wants it: In its 2016 submission to the World Humanitarian Summit, it explicitly commits itself to cut out the ‘sub-contracting’. In its Membership Information Pack (undated, probably 2015), it also confirms the readiness to “embrace the move toward disintermediation.”
The diagram below shows the various transaction layers in the current set-up. It shows that the objective of dis-intermediation is an urgent attention point. This must be a major consideration in the design of a national-level Start Fund in Bangladesh.7

**DIAGRAM 4: THE TRANSACTION LAYERS IN THE CURRENT SET-UP**

**E. ENCOURAGING SUB-CONTRACTING PRACTICES?**

Different NNGOs expressed concern over the speed and the short project time frame. There is a risk that having to produce or finalise a proposal and budget very fast, and start operations within seven days, the conditions for Start funding become an unintended incentive for more sub-contracting behaviour.

- “They collect information from us to put in their proposal. The partners supply them with number of people affected and the needs on the ground.” It feels like “extracting information from us and then they package it up and sell it, we never know how much money is being raised”.

- Some said that the budget allocated was not realistic and others said they returned the money they did not spend. Yet in a situation that is now well known, or fast-changing on the ground, it is important to have some autonomy and flexibility.

- The 45-day limit sometimes leads to the partners “roping in” anyone who can help to get the job done in time. Sometimes it becomes a real challenge as this is not allocated in the budget. Depending on the hazard location sometimes more staff are needed but it has not been allocated in the budget”. “If everything has to done in 10 – 15 days we are running to please the process.”

- In some locations access is very difficult, there is not even enough money allocated in the budget to get staff to and from the field locations. One interlocutor said “It means we have to invest our own resources which are then not repaid”. There is very little room for negotiation. One person said “Modality of partnership depends on tradition of subordinate relationship; the junior partners does not have much say”.

- The local staff of INGOs also confirmed that during the response because of the short time frame both local staff of INGOs and partners are overstretched. “We are working very long hours and in difficult circumstance and there is no compensation.” Partners felt that they were being squeezed.

- There is also a matter of how long it takes for the funds to be transferred to the NNGOs. Some said that the fund transfer is coming late. They suggested that there could be an agreement on a standard amount that can be mobilised by the NNGO from its own resources to respond immediately, which then can be replenished by the Start member agency.

- The 45-day implementation obligation is also a challenge for INGOs, as they also must collate information and report within those timelines. Even when some have had a long-term partnership, the timeframe is very tight.

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7 We are told by the MEAL team that reducing the number of intermediaries for the national fund is an intent. We are confused about one Start Fund team member suggesting that SCF UK and the global Fund are the same. Legally indeed, Start does not have a separate identity, but each has its own operationing and service provision costs. Presumably these would be reduced if Start were a separate legal identity.
SWISS DEVELOPMENT COOPERATION:
No legal restrictions to directly funding national organisations also for humanitarian action. It happens regularly, especially in smaller- and mid-sized humanitarian crises and in conflict-situations where international organisations do not enter directly. Often the co-funding of the SDC to national organisations is in the order of 50% but for relief work it can go up to 100%. (R.S. SDC)

DUTCH MINISTRY OF FOREIGN AFFAIRS:
No legal restrictions to directly funding national organisations. At the World Humanitarian Summit, the MoFA committed to do so via country-based pooled funds, and committed to make available funding for capacity-strengthening. The practical constraint for the Ministry is the need for a ‘multiplier’ i.e. an entity that has the capacity to carry out the assessments, due diligence if needed, and manage a diversity of contracts. Two of the channels to do so are the Dutch Relief Alliance and the Start Fund. Discussions are taking place about a channel to directly fund national NGOs. (HH)

DFID:
No legal restrictions, the concerns turn around fiduciary responsibility and general due diligence. The same challenge of capacity-constraints as for the Dutch MoFA, so they need a multiplier. (F.T.)

The EU’s ‘Instrument contributing to Stability and Peace’ for Lebanon and Syria can directly fund national NGOs. These are actively encouraged to respond to the regional or thematic ‘calls for proposals’, as the EEAA wants to contribute to the strengthening of civil society. (Restrictions apply re. funding of Syrian NGOs i.e. organisations and individuals on the sanctions list cannot be funded, and there may be restrictions on money transfers. But there is no legal or overall policy restriction.) (J. CM) ECHO on the other hand cannot currently directly fund NGOs, because of Article 7a of the Humanitarian Aid Regulation which does not authorise it. No short-term resolution of this legal restriction in sight. (B.M.)

USAID.
Well before the WHS, committed to directly channel 30% of its budget to local actors. In a food security programme in Bangladesh, USAID wants proposals to have a national agency as the lead, with the international one in a technical support role, where needed. (see also Pool 2014)

CANADA:
Has no legal restrictions. Eligibility depends on other institutional track record and humanitarian principles and standards criteria.
### Recommendations related to the global Fund’s modus operandi:

1. Member agencies need to live up to their responsibility to provide comprehensive and full briefings to their actual or potential collaborators on the Start Network, and the Fund and its processes.

2. As a matter of principle and good practice, those that are likely to be part of a response, must be involved in the design of the proposal and the budget. They also need to be fully informed about the financial provisions that the Start Fund makes in terms of management fee, budget variation, post-project learning etc.

3. Non-member collaborating agencies, that are part of a proposal, join in as observers to the Project Selection Committee meetings. There is no restriction on this in the Start Fund handbook.

4. When a proposal is approved, and a budget finalised, those that are part of the response have information about the budget and how it is allocated and for what among the different collaborating agencies. Collaborating agencies need to get a fair and unearmarked share of the management fee. They also need to take fully part in the decision whether to apply for the post-project learning budget, and what to use it for.

5. The overall financial tracking needs to become more refined on a mandatory, not an optional, basis: It needs to distinguish what amount of money goes to whom, and on what terms, and what ‘goes through’ and what ‘goes to’ the different agencies. Cash flow issues in-country, and possible contributions in kind or financial, from collaborating agencies, need to be captured and included in the overall reporting.

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### F. A NATIONAL LEVEL START FUND.

Internal discussions are taking place within the Start Network that have considered three options. (For details, see the main report.) These are not necessarily exclusive of each other.

**Model 1: A NGO ‘pass-through’ window of the Start Fund**

**Model 2: A NGO-earmarked window of the global Start Fund**

**Model 3: A national-level Start Fund, accessible by national and international NGOs.**

The possibility of national level Start fund in Bangladesh became real when DFID indicated it would make available for this £10 million over a period of 4 years (2017-2020). For the time being, that contribution will pass through the global Start Fund. Our conversations with DFID indicated that they could have provided the contribution directly into a national level fund, if Start had already had the set-up.

The vision is that “Start Fund Bangladesh will be a peer-managed financing mechanism co-created and developed in Bangladesh by Start Network member NGOs. This project is designed for national and international NGOs and donors to benefit from the strength of an international network.” ([Project Concept June 2016:1](#)) One of the intended objectives is to ‘unlock collaborations between NGOs in Bangladesh’ ([Idem:2](#))

**THE PROCESS OF OPERATIONALISING A BANGLADESH NATIONAL FUND IS ENVISAGED AS COMPRISING OF TWO MOVES:**

1. The increasing devolution of the governance responsibilities of the Start Fund Network for Start Fund Bangladesh (once local actors have interiorised the principles and procedures of Start global)

2. The expansion of accessibility of the fund to a first cohort of non-member organisations and more national organisations. (concept note June 2016)
The gradualist nature of the experiment is further underscored in other statements, e.g. "The start of the project will see the Bangladesh model integrated into the global structure, and decision making for the Bangladeshi context will be a joint responsibility between Bangladeshi and global colleagues from Start members. In year two to four the focus will be on enabling national NGOs to Start accessing the fund directly. This will be a phased route, which will include looking at a context-appropriate due diligence process that builds on the work done on due diligence under DEPP, CHS and other initiatives. (from an undated 1 pager: Building a national Start Fund model: Enabling fast, first-phase response to humanitarian crises in Bangladesh.)

ADVICE TO THE ONGOING DESIGN CONVERSATIONS ABOUT A NATIONAL START FUND IN BANGLADESH:

As the design conversations have only just begun -though need to proceed quite fast in Bangladesh- we can only offer some observations and advice.

- Co-creation and co-design foster shared responsibility: A first working meeting took place in February 2017. Only Start member agencies were present. We were made to understand that some of the hesitations about including Bangladeshi non-members relate to raising unrealistic expectations, but also the practical problem of who to invite given the large number of NNGOs. Our recommendation is to involve more non-members from the very outset. Though challenging, this can only have benefits in the medium-term if well handled:
  - It will create a process, like that of the Start Network, where participants learn to focus on the purpose of what should be a ‘public good’, and not (only) on their institutional interest;
  - Early involvement in co-creation and co-design creates a strong sense of shared ownership and joint responsibility;
  - It shows recognition that such national level fund, even if still ‘Start’ branded, is first and foremost part of a wider disaster management landscape and infrastructure in Bangladesh, for which there are key stakeholders beyond the Start membership and their regular collaborators;
  - It is in line with the promise made to DFID (draft concept June 2016:3) that the priority is to first familiarise “all stakeholders with the competencies and processes involved in a peer-led financing mechanism, and providing the Network members and their partners in Bangladesh the space for co-creation and joint planning of the evolution of the Fund”
  - It taps into the creative ideas of more Bangladeshi stakeholders (‘crowd thinking’), on how to deal with some of the practical challenges, including ‘due diligence’ and ‘risk’ in ways that fit the context and for which they too will take active responsibility. It makes Bangladeshi stakeholders part of the solution.

- Who to invite? There are at least two options: inviting institutions or inviting individuals. The institutional option is to invite a (selection of) the more regular / longer-standing ‘partners’ of the Start members and/or Bangladeshi NGOs currently involved in a capacity-strengthening DEPP project in Bangladesh (which may or may not be same). The ‘right’ -individuals-option avoids the possible wrangle over ‘representation’ of the institutional option: Talk with a diverse spectrum of Bangladeshis who are familiar with disaster-management, and ask for names of Bangladeshis they see as knowledgeable, very professional, independent-minded and therefore widely respected, and approach such individuals to be part of the design work. This may include individuals from civil society, but also people that sit in academia, government or the private sector. They may be active or retired. They are there for their respected integrity and competencies, not as institutional representatives.

- Acknowledge the quality of relationship dynamic: As we have heard in many countries (beyond this consultancy), also in Bangladesh there are issues of real trust between international and NNGOs. National agencies are reluctant to speak up, and will either self-censor or gentrify critical comments about those on whom they dependent to variable degree for funding. ‘Domineering’ behaviour of staff of international agencies, was a regularly used term – which would not easily be used in joint conversations. It cannot easily be ‘measured’ but is easy to observe. Independent third parties may have to provide a supporting role to Start Team colleagues.
EQUALISING THE PLAYING FIELD:
The Bangladeshi NGOs we talked with felt that, even if their national fund is open to both INGOs and NNGOs, they will not be able to compete in terms of producing high quality proposals (in English) along international models, and in a very short time. A certain part of the national fund would have to be reserved for NNGOs, to ensure that they could hope for a 25% share. That resonates with a consideration in the Philippines, where the shape of another national fund is currently also being discussed. There it was suggested, at a first substantive meeting in December 2016, that the governance of the national fund “include safeguards to ensure that decision-making and response leans towards national NGOs, later phasing to all local NGOs. Some suggested a ‘national/local NGO first policy’”. INGO involvement initially is deemed important “to provide legitimacy and take on risk” but it should phase to local/national NGOs and over time become ‘completely national’. (National Start Fund consultation – minutes 2016).

LEGAL RESTRICTIONS AND RISKS:
DFID, like several other institutional donors (though not ECHO) has no legal restrictions against direct funding of NNGOs. The United States Agency for International Development (USAID) (which committed to 30% direct funding to national actors already years before the WHS), in Bangladesh already has a modality that invites proposals that must have a national actor lead, and wherein an international actor can only have a supporting role. The main risk that donors (and others) tend to put a ‘zero-tolerance’ on, is fiduciary risk. Start is in a strong position to keep this in proportion: Many Bangladeshi NGOs have been receiving international funding for decades, typically on a sub-contracting basis, but including from Start member agencies.

Some of them already get direct international funding, often for more developmental work; some of them run large scale savings-and-credit schemes and have bigger budgets than INGOs - they should know something about financial management. Start funded operations are very contained: short-term, often distribution oriented, and for relatively limited sums of money; maintaining financial oversight of this is not a major challenge. And none of the peer-review or learning exercise records pointed at fiduciary problems. Non-member Bangladeshi NGOs coming with up with practical proposals how they will contribute to assuring fiduciary oversight and accountability, would be an additional reassuring factor. Most of the Bangladeshi NGOs we talked with were not invited along by their international ‘partner’ to meetings with donors. The DFID representative in Dhaka indicated that DFID is not opposed to this and is very open to opportunities for direct dialogue.

TRACK RECORDS AND DUE DILIGENCE:
Many Bangladeshi NGOs have gone through multiple due diligence assessments and audits in recent years, some commissioned or requested by Start members. “We are assessed to death” was the summary of one of them. Others are CHS certified, on their own initiative. Additional due diligence assessments (appropriate to Bangladesh and not simply copied from the Buzacott requirements), also taking into consideration the NNGO’s track record, should only take place if there is a clear justification for them, not as a general standard procedure (and structural, delaying, obstacle).

Recommendations

6. Carry out a consultation to determine whether a generic 45-day project time frame is appropriate

7. Provide the possibility for long standing partners to access fund directly from the Start Fund well before 2020.

8. Ensure there is a % of fund that can be accessed by partners directly without competing with Start INGO members. Their ability to write tight proposals (in English) is not necessarily a direct indicator of their ability to do quality work.

9. If needed, create a window for different levels of direct funding for NNGOs depending on their absorption capacity, as is sometimes done in other country-level pooled funds.
5.3 Findings and Observations Regarding the Quality of Partnerships

As mentioned, most of the Start Fund projects from the three alerts were implemented with or by non-member ‘partners’, although some members implement directly.

**THE FINAL REPORTS OF ALERT 12, 90 AND 100 MAKE MENTION OF THE BENEFITS OF WORKING WITH PARTNERS:**

“Existing presence in the area and established relationship with local and district administration for better coordination. Able to use their office space and warehouse facility, especially for storing hygiene kits. Local knowledge, context and experience about the affected area to facilitate the distribution. Experienced partners are required to manage quality implementation and timeliness. This time both the partners since they are experienced in response (cash and in kind), managed the timeliness and quality very well”.

“All three agencies conducted implementation through local partners and despite occasional challenges such as local partners not having the capacity to maintain humanitarian compliance standards, the response was carried out well due to the pre-existing presence of these agency partners and local knowledge”.

“Local partners have regular presence in the area affected by flood and they have the information on practical ground which help to make effective decision for response planning, project desi and community involvement in project implementation. They can make proper targeting to reach the most affected, most remote and most vulnerable families and communities. Effective coordination to avoid duplication of the geographical area and household and ensure proper utilization of limited resources avoiding misuses. They have very good relationship with local authorities and elites which helps to do the implementation of activities without any kind of security incidents.”

**THIS REPORT ALSO POINTS TO CHALLENGES:**

“Local partners have their own resources constraints and are not always innovative in the project delivery, rather following the traditional mechanism. They require strong support in Monitoring and Evaluation (M&E) to ensure programme quality rather than just aid delivery/distribution”.

“Local partners depend on local level of service sources and have limited back up options of stock piling, generators, internet connections which sometimes interrupt smooth and immediate implementation. Sometimes communication faces technical challenges due to the reliance on available services”.

“Partner also requires support to enhance knowledge & capacity on current humanitarian standards & compliances issues and execution them during implementation of the project”.

Three concerns from international agencies, that we hear around the globe, also came up in Bangladesh: National and local agencies have ‘capacity’ weaknesses; some of their leaders are connected to political parties, which may compromise their ability to implement according to humanitarian principles; and some of their leaders have been there for so long, that it is seen as a governance problem. While valid, such concerns cannot remain at the general level, and also are assumptions that need to be tested.

- **CAPACITY WEAKNESSES:** These sometimes come up in the post-project learning exercises. They may be real for NNGOs, but also exist for INGOs, as our overall review clearly signals. Three observations here are appropriate: If this is with long-term ‘partners’ of an INGO member agency, why have they not been effectively addressed yet? Can the members that are not yet involved in DEPP or other capacity-strengthening initiatives, draw on those to address the issue (in between crises)? Can a cumulative learning across the three responses in Bangladesh be pulled out (unfortunately it seems that no learning records were created or can be retrieved) be used to focus preparedness for the following crisis – possibly linking to the ‘anticipation window’ initiative that is being developed by the Fund?

- **HUMANITARIAN PRINCIPLES:** Most national civil society organisations see themselves not just as service-deliverers but as part of the governance dynamics in their country. A connection to a political party is not an automatic indicator that the agency will not be willing or able to adhere to humanitarian principles. Political connections may actually be used to protect the integrity of the relief operation. The NNGOs also confirm that some of the INGO Start members, who have been in Bangladesh for decades, and are (largely) staffed by nationals, are always totally ‘outside’ the dynamics in their environment? INGO staff also confirmed that ‘most of us have migrated’ to INGOs.
• **NO LEADERSHIP ALTERNATION:** This may raise questions but cannot lead to an immediate interpretation. There certainly are Western INGOs where directors continue beyond the two terms that most national constitutions would allow their presidents. NNGO leaders staying for a long time can also be one of the central pillars of stability and continuity in the organisation, when a lot of other staff move regularly, including to join international agencies.

Several Start members have long-standing collaborations with local and national NGOs, often for development-oriented work or Disaster Risk Reduction (DRR) work. Some have also a ‘stand by’ arrangements with NNGOs, underpinned by an MoU, as part of disaster preparedness.

The term ‘partner’ in Bangladesh is used as indiscriminately as elsewhere and can cover any collaborative arrangements, ranging from a strategic, joint-decision making partnership, to a very functional sub-contracting relationship.

The quality of partnership is one of the key aspects identified in the localisation discussions. The issue of genuine ‘partnership’ came out clearly in our workshop with some Start members, and Start Team and colleagues from the MEAL team in London on 18th Nov 2016. Several of the Bangladeshi NNGOs pointed out that, notwithstanding long-term relationships, they are not involved in decision or design processes but essentially used to ‘implement’. That prevailing pattern was acknowledged by our interlocutors from INGO members.

Nobody in either group seemed to be aware, or making active use, of the 2007 Principles of Partnership for the relief sector. Bangladeshi NNGOs value equitable partnership and see its necessity. They requested that there be a joint development of partnership principles and indicators to measure the actual state, and progress in the quality of the relationship. DFID is also showed keen interest in this. We came across only one Start INGO member who has a score card tool and regularly uses it to gauge ‘partner satisfaction’.

This corresponds to the results of a Shifting the Power survey (2015: Year 1 Overview: 8) where

- About 59% of respondents agreed or strongly agreed that “INGOs tend to threat national partners more as sub-contractors than as real partners” (another 5% or so neither agreed nor disagreed)
- About 82% agreed or strongly agreed that national and local NGOs should have more power compared to other actors than they do at present. (approximate percentages are mentioned because the answers are visualised as coded strips against the range of 0-100%)

The following table highlights some of the ideas from group discussion in the workshop with national and local actors and partners of INGOs.

<table>
<thead>
<tr>
<th>WHAT MAKES PARTNERSHIP ‘EQUITABLE’</th>
<th>WHAT ARE THE CHALLENGES?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Resource sharing</td>
<td>Deficit of trust and respect</td>
</tr>
<tr>
<td>Mutual trust and respect</td>
<td>Values are not the same</td>
</tr>
<tr>
<td>Based on human rights and dignity</td>
<td>Treated as subcontractors like commercial approach</td>
</tr>
<tr>
<td>Mutual accountability</td>
<td>Less coordination</td>
</tr>
<tr>
<td>No domination, shared values</td>
<td>‘Domineering behaviours’ tendency</td>
</tr>
<tr>
<td>Participatory approach</td>
<td>Staff recruitment</td>
</tr>
<tr>
<td>Appreciating</td>
<td>Monitoring</td>
</tr>
<tr>
<td>Win–win power</td>
<td>Implementation</td>
</tr>
<tr>
<td>Reciprocity</td>
<td>Negative mind-set</td>
</tr>
<tr>
<td></td>
<td>Marketing approach</td>
</tr>
<tr>
<td></td>
<td>Brokering (intermediaries)</td>
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<tr>
<td></td>
<td>Lack of accountability</td>
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<tr>
<td></td>
<td>Create conflict within organisation</td>
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<td></td>
<td>Mentorship absence</td>
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<td></td>
<td>Lack of institutional capacity building</td>
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<td></td>
<td>No support for organisational development</td>
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<tr>
<td></td>
<td>Staff turnover</td>
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<tr>
<td></td>
<td>Discrimination in fund allocation</td>
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<tr>
<td></td>
<td>Resources are not logically distributed</td>
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<tr>
<td></td>
<td>Policy challenges</td>
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<tr>
<td></td>
<td>Lack of understanding local context</td>
</tr>
<tr>
<td></td>
<td>Could not change plan</td>
</tr>
<tr>
<td></td>
<td>Rigid budget</td>
</tr>
</tbody>
</table>

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8 Conversation with 9 Start Fund Members in Bangladesh, 16th January, 2017.
THE NNGOS INTERVIEWED FELT THAT THERE IS WAY TO GO TOWARDS ACHIEVING EQUITABLE RELATIONSHIP.

- The relationship often depended very much on the individuals in charge of the partner relations at country level, more than the agency as such. Some of these were felt to be open and more equitable minded, while others maintained very controlling attitudes, using their control of resources to exert power.

- Mention was also made of international alliances ‘re-structuring’ or ‘re-allocating’ which one leads in a particular country. The consequences could mean a change in INGO alliance member, with the new-comer oblivious off or not necessarily maintaining the same relationships with the same NNGOs. Long-standing relations are broken when a new structure is put into place. Long-standing partners are not involved in the decision of who is going to be the international alliance ‘lead’ in their country;

- Some of the Start members that were interviewed said that they were going through a review process. One member confirmed that, “We decided to have a smaller number of partners, there was a partnership evaluation. There was assessment of the books, the policies etc. so there is now a shift from project to strategic partnership.”. They carry out a partner review every two years. This is can be seen as positive move, however, NNGOs are powerless in the face of these decisions being taken that can affect them profoundly.

THE CONVERSATIONS WITH START MEMBER AGENCIES ACKNOWLEDGED THE BROAD ISSUES, AND THAT CHANGE WAS NEEDED:

- “We use them depending on the project” … “We get the information from them, they are the implementers and we are the thinkers” … “How can we transfer that knowledge”

- "We all migrated from national and local NGOs......there was a discussion about how we can compensate them ... almost like a transfer fee in a cricket team when a talented player is transferred from one team to another”.

- Within Start membership the processes are “member centric” at present.

- True partnership and a shift in the Start Fund will come when partners are part of the decision-making processes, in the allocation committee, project selection committee and in the governance processes.

- The ‘national window fund’ that is being set up at present, is “a real opportunity to do things differently and demonstrate our commitment to localisation.”

- “More Bangladeshi national organisations should join the membership” (now there is only Caritas Bangladesh, which in some places is referred as ‘international NGO’ (Early Recovery Cluster, Contact list and Shelter Cluster, May 2015, Asia Development Bank Report, 2008).

- The national organisations are very good at implementing but they need to improve on Monitoring and Evaluation and Accountability.

### OPPORTUNITIES
- Optimum use of resources
- Trust building with community
- Mentorship
- Technical support including project proposal development
- Close monitoring
- Immediate response
- Information collection and access
- Conflict mitigation
- Resources distribution
- Building credibility

### RECOMMENDATIONS
- Dignified partnership
- Mutual trust
- Long-term stable relationship
- Understanding the partner’s capacity and need for strengthen capacity
- Need to simplify the monitoring Process
- Equal voice in decision-making and planning
10. Discuss and set partnership principles for the Start fund-ed projects.

11. Partnership Principles included in the DNA of the national fund in Bangladesh.

12. Carry out periodic, reciprocal assessments on the quality of relationship (one option could be score card already used by one agency).

13. Organise a regular dialogue between Start members and non-member collaborators, with independent and trusted third-party facilitation, to increase understanding and learning.

14. Monitor on what terms the money is passed on to partners to ensure it is not leading to more sub-contacting behaviour.

15. Appropriate funds are allocated for staff salaries in the budget so it does not lead to brain drain during Start Funded response.

16. More attention should be paid to safeguarding partner relationships in times of INGO changes.

17. The table on the next page could be used to gage the quality of participation of the partners.

### Recommendations

<table>
<thead>
<tr>
<th>DEGREE OF PARTICIPATION</th>
<th>DEFINITION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ownership</td>
<td>The partner controls the decision-making</td>
</tr>
<tr>
<td>Functional</td>
<td>The partner fulfils only a particular role with limited decision-making power (for example, forming a committee which is then supervised by an INGO staff member)</td>
</tr>
<tr>
<td>Material</td>
<td>The partner receives funding or in kind support in return for implementing programme.</td>
</tr>
<tr>
<td>Motivation</td>
<td>The partner is asked for their opinion on what they would like to see, but their opinion has limited sway in decision-making</td>
</tr>
<tr>
<td>Consultation</td>
<td>Information is gathered from the partner, but they are not involved in the resulting discussions which inform decisions.</td>
</tr>
<tr>
<td>Information Transfer</td>
<td>The partner is informed of decisions and actions, but have no say in either the process or the result</td>
</tr>
</tbody>
</table>

### 5.4 The Start Fund and Capacity Development

The capacity of local and national organisations to deliver a quality response has been discussed widely in the debates on localisation. In Bangladesh, the partners involved in the alerts response are of varied size and capacity. Some run micro-credit programmes, have larger incomes than several INGOs, are nationally known and enjoy credibility, a good reputation and respect. Others are smaller and very local organisations very dependent on INGO and donor funding. The majority have been working with INGO partners for a long time.

‘Localisation’ risks (sic) giving rise to a new wave of ‘capacity-strengthening’ by INGOs, without critical review of why the earlier waves apparently were ‘not successful’. Also in Bangladesh, there is a history of ‘capacity-development’, often focused on technical capacities. One INGO interlocutor confirmed that we are now taking a new approach. A few NNGOs pointed out that “We have had our capacity built for more than 20 years, they keep giving us knowledge, but when will we get resources to actually practice what we have learned. Why are we still talking about capacity building?”. 
In our main report, we point at some generic problems such as the use of ‘capacity building’ or ‘capacity-development’ with equal vagueness as that of ‘partner’. It is not clear whose capacity is being built for what, how individual or team capacities would translate into institutional capacities, what we would expect to see (also in terms of changing roles and responsibilities when capacity is there) if it is successful, and how organisations can resolve the problem of maintaining capacity once it has been built.

National organisations that are part of an international alliance find in that relationship opportunities for more sustained capacity-support and organisational development, as the example of Caritas Bangladesh shows.

**BOX 3: MENTORING WITHIN THE CONTEXT OF AN INTERNATIONAL ALLIANCE RELATIONSHIP.**

Caritas Bangladesh applied for Start Network membership in 2015. They were sponsored by CAFOD, who provided support throughout the process. Caritas Bangladesh reflected that the Buzzacott due diligence process was difficult; they had to ask for many clarifications and talk through some issues via Skype calls. On the whole, Buzzacott were helpful. The Caritas Bangladesh person who acted as focal point for the process was of the opinion that it will be very difficult for other NGOs to go through that process. As part of the Caritas Internationalis family, they had been developing certain organizational policies over the years. Other NGOs, not part of such international network, may not have had the same investment in organizational policy development.

Caritas Bangladesh applied for project funding from a Start Fund allocation twice. The first time they did not succeed because their membership was not yet approved, so CRS applied instead at the last minute, but did not succeed. However the process of going through the process was really helpful to know what is expected of winning proposals. CAFOD then provided funds to Caritas Bangladesh to implement the project. Caritas Bangladesh, CAFOD and CRS had a discussion on the lessons learned about applying for the fund and integrated this learning for the next application. A CRS representative had also taken part already in the Project Selection Committee, which was really helpful in understanding the process and what is expected. Caritas Bangladesh also benefitted from that experience to work on a strong project proposal. CRS provided feedback on a draft of the proposal. CRS and Caritas Bangladesh see their relationship as a strategic partnership, and they will continue to support each other.

More broadly, there is an, as yet, unrealised opportunity to bring a richer approach to ‘capacity-development’ by actively creating synergies between Fund operations and relevant DEPP projects (see Annex 7 of the main report for some more on 3 highly relevant ones: Shifting the Power, Financial Enablers and Transforming Surge Capacity). DFID, as donor to both, wants to see this happen:

“DFID is also keen to see synergy of the investment made in the DEPP project contributing to localisation, and the possibility of direct funding to national and local partners connected with DEPP.” (interview with DIFD representative in Dhaka office)

We did not have the time to inquire more deeply in the DEPP projects in Bangladesh, and certainly do not want to give the impression of making ‘evaluative’ comments. We only note here some of the observations from Bangladeshi NGOs that take part in the Shifting the Power Project.

**THREE POINTS STAND OUT:**

- The SHAPE framework (for organisational capacity-self assessment and subsequent capacity-development planning) is seen as good in itself, but requires significant time investment that some find very hard to afford. For some organisations it was difficult to go through the whole process in time, because of lack of understanding about the framework and lack of mentoring support when things got difficult. It should also not have been a ‘one size fits all’, but more tailored to different types of organisations with perhaps different priority needs (see also Lewinsky 2016).

- NGOs prefer being involved in designing projects, whose purpose is to help them strengthen their capacities.
“The projects are designed elsewhere then they decide the project countries, we are not really involved until they need to implement them”.

“There is a lot of talk about shifting the power, we do not need projects for that, they need to let go of power and make space for us”.

“Each project talks about power, but power will still be with them but framed differently”

- A perceived lack of coordination between projects. NNGOs taking part or hearing about different DEPP projects find that “there seems to be a lack of coordination between the different projects that are being brought to us.” One Senior INGO member of staff also said there needs to be mapping exercise to reduce the overlaps between different initiatives from member agencies and other related initiatives. For example, in 2011, an individual Start INGO member already had a humanitarian capacity building project, focusing on technical capacities. The more recent concept aims for more than that. The Empowering Local and National Humanitarian Actors (ELNHA) project is aimed at shifting power and resources in the humanitarian sector from international humanitarian actors to local and national ones.

Mention should be made of developments within Shifting the Power in Bangladesh, which is moving towards the creation of what may be the first platform for collaborative action around relief action. Reportedly, the Bangladeshi NGOs involved in the project, made the case that it cannot be limited to them, but needs to open more widely.

The bigger challenge for many NNGOs is not to ‘build’ but to ‘retain’ capacity. Many NNGOs do not have the resources to have staff dedicated only to humanitarian response. Most staff have dual roles; in two organisations interviewed the organisations had integrated DRR into the job descriptions of their regular staff. NNGOs confirmed that over the years they have regularly lost their staff to INGOS. They said their best talent is drained by INGOS, in some cases to their ‘partners’. It is indeed the case that 95% of the INGOS staff interviewed had worked for local or national organisation at some point in their career. NNGOs are losing staff to INGOS as they can pay better salaries, benefits and working conditions. An example was shared by Executive Director of a partner agency. “A Field Facilitators can earn 25,000 BDT in an INGO where we can only afford 10,000 BDT”. One partner described it as “culture of discrimination” because donors do not allow local NGOs to offer such benefits for their staff. NNGOs felt they were taking the risk and investing in staff yet the benefits were going to the INGO partners. “They are always trying to squeeze us”.

Staff who had joined INGOS, confirmed that they did so because of better salaries and benefits but also better opportunities for career progression and the chance to travel abroad. One female interlocutor said that it was in her long-term plan to go abroad and experience other cultures. She said “It is difficult to be single and work here”. This corresponds to the findings of A. Featherstone (2016a) Views were also expressed that sometimes staff leave because of poor management in local and national NGOs, that they don’t make the most of the opportunities that are offered to them. However, they all agreed that it poses a structural problem for ‘sustainable capacity’ especially for NNGOs.

**WITHIN THE PARTICULAR FRAMEWORK OF THE START FUND (TIME-BOUND CRISIS RESPONSE) THE OPPORTUNITIES FOR IMPACTFUL CAPACITY-DEVELOPMENT (INCLUDING FOR MEMBER AGENCY STAFF) ARE LIMITED:**

- There is some opportunity in ‘learning-by-doing’. One member organisation confirmed that they had learned much by being of the project assessment and selection process and could now better advise their collaborating NNGOs on how to put together a winning proposal. More regular and fuller involvement of some ‘partners’ in the fully alert-response cycle, will offer a few more individuals such learning opportunities;

- NNGOs, when scaling up in a crisis response, also take on project staff on short term contracts, which does not necessarily attract more experienced people. When the project is finished, they have to let these go, so that their ‘learning-by-doing’ experience gets lost.

- NNGOs often take part in the post-Start Fund-project ‘learning events’. Some were involved in the learning activities at Dhaka level. Sometimes a learning event is also at district level, which makes it potentially possible to involve local authorities. NNGOs that are regular collaborators with Start Network members expressed a wish to meet regularly to exchange experiences among each other, especially after a specific response. They also suggested that it would be useful to have regular dialogue to discuss issue that come up in implementing Start fund-ed projects.
Cumulative learning may need some active attention: Although there have been three Start responses in Bangladesh in three years (2014-2016), all for natural disasters and two of them for flooding in the same area, the proposals for the second and third response that we reviewed had no reference to lessons learned from last time. Also the notes and recordings of Project Selection Committee meetings that we reviewed, did not refer to the learning or challenges faced in previous response.

5.5 The Start Fund and the Participation Revolution

INGO and some NNGO agencies in Bangladesh are committed to the Core Humanitarian Standards (CHS). The commitment to ‘participation of affected people’ was re-affirmed at the World Humanitarian Summit as a call for a ‘participation revolution’. This goes further than consultations about ‘needs’. There is increasing interest in how affected people can be involved in decision making about the assistance they receive. The Start Fund project templates have specific questions around this issue. It is also something that is considered, though not necessarily discussed in any detail, in the project selection meetings.

In the two field locations in Ghaibantha and Kurigram it was clear that agencies took different approaches to community participation. Some worked with the upzala level administration to identify the most vulnerable and high risk zones, then worked at the village level to verify the targeted beneficiaries. Focused group discussions were held with the community to find out who is the most vulnerable. What was really helpful for some NNGO partners, is their INGOs partner providing the very necessary boats as part of preparedness, so they can reach the remote Chore areas which were affected. All partners mentioned that the communities’ needs were far greater than the funds available and it was difficult to manage expectations from the communities and the authorities. Some mentioned that sometimes they were under great pressure from the political interests and they must negotiate very strongly. It helped to have clear criteria for the most vulnerable and it also helped when the community themselves identified the individuals and families. Cash was the most preferred mode of response. It gives the people affected by floods the power to purchase things that they required in their own time frame. One organisation was involved in responding both in 2014 and 2016.

9 One NNGO commented positively on the HAP training they received. That encouraged them to use a more participatory approach with the community in the next response and set up a complaints mechanism. Compared to their previous approach, they felt the process was more inclusive, saved time and saved the burden of decision-making by the partner staff. The community was also much happier with the final list of beneficiaries.

Recommendations

18. More systematic involvement of collaborating agencies in all stages of a response process, from the decision to alert, over the proposal development, the PSC decision-making, the learning reviews and the post-action learning opportunity, provides at least exposure to how others operate (including in a collaborative manner).

19. Share the 10% management fee, flexibly and predictably, as a modest capacity-contribution. Guidance on appropriate budget allocation for hiring staff during implementation of a Start fund-ed project can lead to retaining good staff. Do not actively seek to hire good staff away from NNGOs, when you as INGOs implement directly.

20. More structural capacity-support, ‘within’ and ‘between’ national agencies, takes place before and after the crisis-response. Here the agencies using the Fund can best connect with DEPP and other capacity-oriented initiatives in-country. More so, if there is a consideration of giving DEPP-participating agencies access to a ‘national Start window’ in Bangladesh. As a pilot the Bangladesh window needs a Starting point and to not introduce lengthy Due Diligence and other processes in this phase – the ability to scale up needs to be built on learning from pilot.

21. DEPP and other ‘capacity-development’ project in future have to build more on what already has been done, involve NNGOs in the identification of priorities, and the design and planning.

22. Capacity-development investments should not continue to be made however, in the absence of broader strategies to help NNGOs retain trained, experienced and qualified staff.
“All three agencies made unconditional cash transfers as they were deemed the best form of support, after discussions with the affected community.” Learning and Evaluation peer review meeting for Alert 90, Bangladesh Cyclone Lessons and Actions.

**BOX 4: LEARNING FROM IMPLEMENTATION IN GHAIBANDHA**

We did things differently this time and changed our methodology and used a “women led approach”. We put together a women’s team from the staff members and worked with women also from the Upzala level administration and women leaders in the community. It was the women in the community who led the consultations with us to select the most vulnerable beneficiaries. They decided to give cash to a female member of the family. “It was a really empowering experience” said one female staff member. “The women in the community were really motivated and mobilised.” When asked about their experience the women who received aid said their experience was very different this time around. “We would never want to go back to the old approach”. The team leader confirmed that the agency learned so much, this approach was so much easier. Before they were relying on staff going from house to house to survey, and then made a decision about the list of beneficiaries with the village leaders who often wanted to influence the list of beneficiaries. Now it was the women who chose the most vulnerable against agreed criteria in an open meeting. “We still carried out verification, but it saved so much time.” A community complaints system was also set up, so issues could be raised by people who were not happy. The whole experience was much more satisfactory then previously.

One female recipient who was pregnant at the time and lost part of her home said “with the cash that I received I was able to buy food but also spend the money on buying side panels to replace what I lost in the flood”. It meant she could quickly invest in rehabilitation of her shelter.

Start funded responders find it hard to manage expectations from the affected communities, whose needs persist beyond the (usually) one-off 45-day project. Where an NNGO is the one delivering, and therefore in direct contact with the people, they must handle the frustrations and questions.

In all three communities visited, people were very grateful for the aid received but also repeatedly asked for livelihood support. Several women said they were on the embankment for months after the flooding, some still in temporary shelter. One said “if we had work we can earn our own income, that is the need now, can you help us with that?”. They also brought up the issues for dealing with root causes because they felt that if these are ignored, then the people will be in the same situation every year. There is a need to reinforce and raise the embankments, and raise and safeguard the houses.

**BOX 5: FEEDBACK FROM THE FLOOD-AFFECTED COMMUNITY IN CHILMARI**

In another location in Kurigram, Cilmeri, the community were grateful for the assistance they received. The agency could provide assistance quickly because they had staff in the region and were able to mobilise quickly. They also had some prepositioned stock as part of their preparedness planning. In their organisation there is an allocated cash amount that can be accessed in times of a disaster. This also provides the possibility to act quickly. They worked with the disaster committee to organise the response. The disaster committee had helped the communities in the first hours of their need and helped to evacuate people to a higher and safer ground. They made sure that the cash provided to beneficiaries was secure, and distributed the cash near the market place, so there was less chance of money being stolen. The community asked for livelihood support as it was really poor area and the community are still suffering.
5.6 The Start Fund, National Authorities & National Actor Presence and Influence in Coordination Fora

There is a lack of formal humanitarian architecture in Bangladesh. In recognition of the need to improve the coordination between actors during periods of emergency, new structures were established in 2012, most notably the Humanitarian Coordination Task Team (HCTT). There are national level clusters in place for early recovery and shelter. Most of the Start members are present in these mechanisms, but only two NNGOs. The NNGO implementing agencies, which often carry out most of the humanitarian responses, are absent.

The project proposals mention national coordination mechanisms and national authorities. However, there is tension between speed and coordination with others. Several interlocutors mentioned that the government was too slow. There is Joint Needs Assessment process (JNA) however in the decision making it is shown that agencies did not wait for the results of that JNA11.

There is good coordination between the Start members who regularly work together due to the different collaborative projects in the DEPP project. There is now a move to formalise a network between the 11 partners who are taking part in the Shifting the Power project. The NNGO platform National Alliance for Humanitarian Actors Bangladesh (NAHAB), supported by Shifting the Power, has been in action since a couple of months, there are many challenges but it’s also the first platform of its kind and the organisations that participate are positive on the fact that there is now an organised initiative for NNGOs. This makes it easier for them to engage with Government, INGOs and wider community. It has now opened to wider membership; hopefully it will not create another exclusive club.

There is a real concern from local and national NGOs who are not more regularly connected to INGOs, that INGOs create more and more networks, which exclude many local and national actors, and compete against already existing networks.

DEPP is not the only one creating ‘networks’: The consortium DeSHARI (Developing and Strengthening Humanitarian Assistance and Risk Reduction Initiatives) is also started by some Start member agencies, (Christian Aid working with Action Contre la Faim (ACF), DanChurchAid, Muslim Aid and Save the Children). It works in climate-vulnerable areas of Bangladesh. It works with 15 NNGOs in 27 of the most vulnerable districts of Bangladesh across the southern coastal region, north-west and central flood and chaor (wetland) areas. There are long-standing relationships with local organisations based on mutual learning and experience. As discussed earlier, ELNHA is another project that aims to assist local and national actors have a voice in the national fora.

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23. Affected populations can be more actively involved in the post-project learning, if the learning exercise is brought to their locations.

24. Review the one-size fits-all-contexts 45-day deadline; in some contexts, a somewhat longer period may enable earlier and fuller participation, and hence relevance and possibly efficiency and effectiveness.

25. Lobby donors on a window of funds with focus on livelihood and ongoing response beyond 45 days.

26. Document and disseminate the learning from women led approaches.

27. As per demand from the communities, should Start Member agencies and their partners more proactively take up advocacy in terms of longer term structural issues with the government, this could be their value added.

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11 L&E Committee Peer-Review of Bangladesh and Turkey Responses (and NEPAL), Minutes, January 14th 2014
5.7 The Visibility of National and Local Actors in Start Fund Communications

The names of collaborating NNGOs are mentioned in some proposals, more so in Alert 90 and 100. They are not mentioned on the Start Fund website. Their visibility or not seems to depend largely the individual Start member’s attitudes and practices. Some mention them on their websites in general terms.

Collaborating agencies typically provide information, but they are not sure how this is being used. They assume that the information provided by NNGOs is being packed and sold to raise more money, but they were not sure if their name would even appear in there.

NNGOs want more visibility with donors. Some NNGOs mentioned that they never get the opportunity to meet the donors. DFID in Bangladesh indicated it is very open to this.

Recommendations

32. Ensure that at least the names of all national and local collaborating agencies, and participants in DEPP projects, appear in Start external communications (website, Facebook, public reports, donor reports).

33. The Start Fund and the members whose projects get funded, highlight the role, contribution, achievements, ‘extra mile’ etc. of the national / local actors. This could be written up or simply documented more quickly in an audio/visual recording. Start can make more public the contribution of partners, which will contribute to changing attitudes and perceptions about local agencies.

34. When practically possible, Start members bring one or more of their regular partners along to meetings with donor representatives, and do not stand in the way of them having direct contact.
6. Conclusions

The analysis of the three responses funded by the Start Fund provides recommendations on what changes need to be made to contribute further to localisation. The first issue this report highlights is that improving the quality of relationship with NGOs is key. It will lead to improvement in funding flows and quality of funding. The second is the tension caused by the speed of response and working in partnership as well as intensive participation of affected populations. The third is the need for Start Fund processes to ensure inclusion of NGOs in the various moments of an alert-response process. The fourth is the need to ensure that the new Start National Fund is set up in such a way that it creates a level playing field for NGOs and INGOs. There is a need to safeguard a window of funding for NGOs as they will not always be able to compete for funding on the same terms as INGOs, in formats, with a jargon and a mindset that over decades have been honed by the latter. The inclusive approach to set up the new fund is crucial if it is to have national ownership, and the Start Fund wants to help the Network achieve its stated goal of 25% of its (global) budget going to national actors by 2020, with at least a major reduction in intermediation.
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