

CHALLENGES AND WAYS FORWARD IN SUPPORTING LOCAL LEADERSHIP OF CRISIS RESPONSE IN AFGHANISTAN

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Cover photo: Band-e Amir lakes near Bamyan in Central Afghanistan. Shutterstock

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[Humanitarian Advisory Group \(HAG\)](#) was founded in 2012 to elevate the profile of humanitarian action in Asia and the Pacific. Set up as a social enterprise, HAG provides a unique space for thinking, research, technical advice and training that contributes to excellence in humanitarian practice.

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ABBREVIATIONS

ABADEI	Area Based Approach for Development Emergency Initiatives
ACBAR	Agency Coordinating Body for Afghan Relief
AHF	Afghanistan Humanitarian Fund
DFA	De facto authorities
FBO	Faith-based organisation
HAG	Humanitarian Advisory Group
HCT	Humanitarian Country Team
ICAI	Independent Commission for Aid Impact
IFRC	International Federation of Red Cross and Red Crescent Societies
INGO	International non-governmental organisation
IPC	Integrated Food Security Phase Classification
KII	Key informant interview
LNGO	Local non-governmental organisation
LNGOs	Local and national non-governmental organisations
MOE	Ministry of Education
MoU	Memorandum of understanding
NNGO	National non-governmental organisation
OCHA	UN Office for the Coordination of Humanitarian Affairs
UN	United Nations
UNDP	United Nations Development Programme
US	United States
USAID	United States Agency for International Development
WLO	Women-led Organisation
WRO	Women's Rights Organisations

EXECUTIVE SUMMARY

This research offers insights into the challenges and opportunities for local and national non-governmental organisations (LNNGOs) in Afghanistan when working with international humanitarian agencies. It was undertaken in the context of changing dynamics and high uncertainty following the socio-political upheaval experienced in Afghanistan since August 2021.

The Taliban's takeover changed the socio-economic and political landscape of Afghanistan, triggering significant events including the collapse of the banking system, changing security conditions, restrictions on women, and a halt to development assistance leading to closure of local and women-led activities.¹ Shifts in donor funding and policy were found to be more significant in leading to the closure of LNNGOs and their programmes than the actual policy and practice of the Taliban.² A changing and often unpredictable environment brought both challenges and opportunities for local and international organisations striving to improve conditions for the population, compelling humanitarian and development actors to rapidly adapt their operations and partnerships.

As the political and operational environment for international agencies is projected to get ever more challenging and the UN is undertaking an operational review triggered notably by the Taliban decision to ban women working in UN agencies, the importance of finding ways to more effectively support LNNGOs for whom exiting the country is not an option and might find ways to negotiate the space to continue operations, has become more evident.

The objective of this research was to chart evolutions in the humanitarian sector in Afghanistan, identify challenges LNNGOs face, and explore opportunities for international actors to better support local leadership in humanitarian action. This report demonstrates that a localisation

agenda is applicable in Afghanistan despite the difficulties faced by humanitarian actors.

KEY FINDINGS



1. Changes to the operating environment fall most heavily on Afghan LNNGOs and their staff.

- ▶ The transfer of funds remains difficult amid the ongoing banking crisis.
- ▶ Obtaining work permissions is hindering effective response amid a short-term funding environment.
- ▶ Staff mobility remains a challenge, amid increasing restrictions on women in the humanitarian workforce and ambiguity over official guidelines.
- ▶ Humanitarian actors continue to be subjected to pressure and interference.



2. Focusing on emergency humanitarian response has reduced support for locally led programs and organisations.

- ▶ A funding pivot towards humanitarian action favours international organisations.
- ▶ Opportunities for local decision making have decreased.
- ▶ INGOs retain more influence over partnership opportunities, with LNNGOs lacking adequate support despite being the main actors present in the country.
- ▶ Innovations in inter-agency and collective action priorities on localisation in other contexts, such as HCT Localisation Strategies with measurable indicators to track progress, have not yet been implemented (with some exceptions as of the NGO Twinning Programme linked to the Pooled Fund).

1 UNOCHA, [Afghanistan: Humanitarian Update](#), April 2023

2 IASC Mission 2023



3. International support for local organisational sustainability and response capacities has decreased.

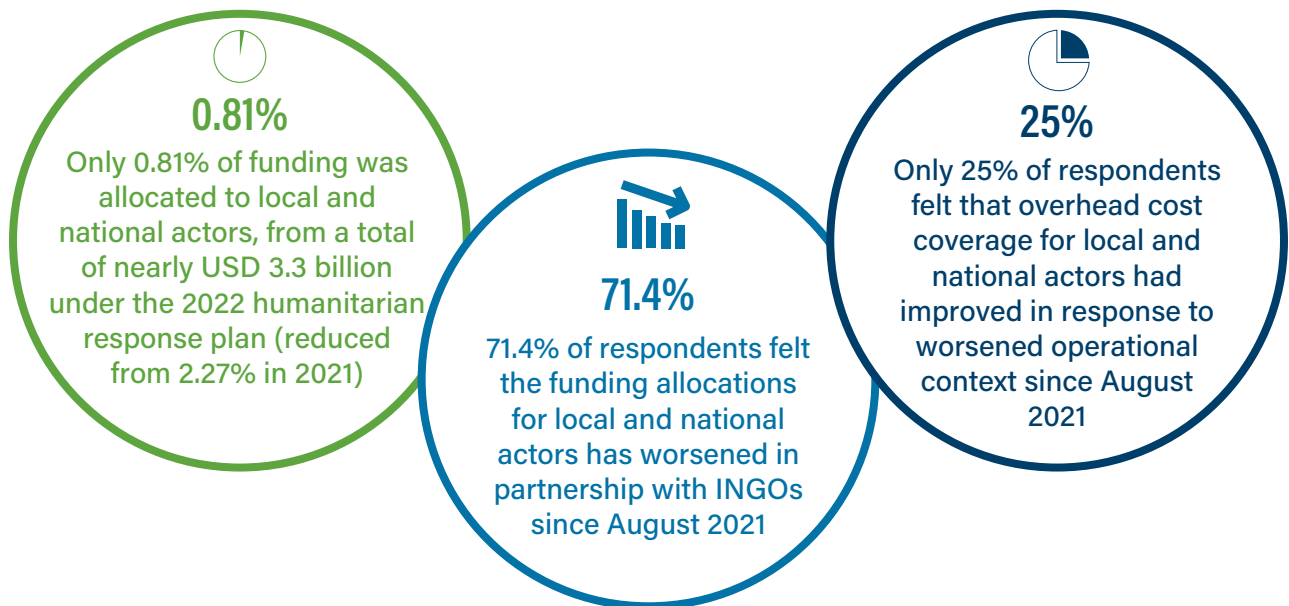
- ▶ Overhead cost coverage remains inadequate, with little evidence that intermediaries have increased levels of coverage (which were already insufficient) in response to the increased operating costs and burdens carried by LNNGOs
- ▶ Earmarking and changes to global funding priorities favour international actors.
- ▶ Staffing drain (both through staff poaching by international actors, as well as migration) is adversely affecting LNNGOs.

- ▶ LNNGOs experience reduced capacity strengthening with international partners.
- ▶ Information extraction is occurring with little strategic support in return.



4. There are viable opportunities for international actors to support, build on and leverage local strengths.

- ▶ Improved geographical access for project implementation and monitoring.
- ▶ Leveraging role of faith-based organisations and the private sector.
- ▶ Working with LNNGOs for engagement in specific/targeted aspects of humanitarian response.



SUMMARY OF RECOMMENDATIONS

Below is a summary of the study recommendations. More detailed versions of the recommendations as well as relevant examples are provided at the end of each chapter.

Each recommendation is underpinned by the 'cross-cutting circuits' presented in Section 4, which carry their own recommendations.

I. More equitably share the burdens of the operating environment in INGO-LNNGO partnerships.

INGOs should explore creative and sustainable options to support LNNGOs to face challenges in the operating environment, focusing on the position of women, registration for LNNGOs, and bureaucratic obstacles. Such options may take the form of new ideas or draw on precedent, noting that the burden of overcoming these obstacles should not fall on LNNGOs without funding and capacity support from their INGO partners. This requires a shift in attitudes. International organisations should ensure that LNNGOs are at the decision-making table during decision-making processes that affect them. Consistent with the findings of other studies, consensus building on what constitutes acceptable funds transfer mechanisms could reduce exposure to compliance risk and penalties.

II. Counter the decrease in locally-led programming resulting from pivots towards short-term humanitarian funding.

Donors and international intermediaries should invest in processes that support long-term planning informed by community and LNNGO priorities that can operate across short-term funding cycles. INGOs should consider greater engagement of LNNGOs for short-term humanitarian programming, to counter the current imbalance. At an inter-agency level, clear objectives with measurable indicators should be established to catalyse and track progress towards more effectively implementing equitable humanitarian partnerships with LNNGOs, and

reinforcing locally-led humanitarian action, such as through an HCT Localisation Strategy with linked action plans at cluster level and within programme, partnerships and consortia arrangements.

III. Increase support for local organisational sustainability & response capacities.

Donors and international intermediaries should move to ensure that support to LNNGOs for administrative and operational costs, including overheads, is adaptable to prevailing conditions. Alternatives to fixed mechanisms are offered in Section 5. INGOs should take action to minimise actions that drain LNNGO capacity, through 'poaching' qualified staff from LNNGOs. Ethical recruitment guidelines and compensatory measures should be considered as options to reduce the risk of poaching, although such efforts require broad consensus and commitment from international intermediaries. A stronger and consistent pursuit of localisation in humanitarian action requires investment in capacity strengthening and should entail greater decision-making power for LNNGOs in agenda setting project design, and project delivery.

IV. Act on opportunities to support, build on and leverage local strengths.

Make the most of improved geographical access to invest in building trust with de facto authorities (DFA) to increase support and foster buy-in, recognising the heterogeneity of officials across the country and taking opportunities to demonstrate programme effectiveness. Humanitarian actors may find benefit in acknowledging, supporting, and leveraging the role that faith-based organisations (FBO) can play in representing common interests of the humanitarian sector. INGOs may also avoid sweeping restrictions by fostering partnerships with LNNGOs that have specialised focus on a particular aspect of humanitarian action.

1. INTRODUCTION

In August 2021, the Taliban assumed control of Afghanistan with significant impact on the humanitarian context in the country, from both a needs and operational perspective. Humanitarian actors have faced profound challenges in adjusting their ways of working amid a rapidly evolving operating environment shaped by global sanctions and local decrees.

Alongside challenges in responding adequately to the increasing needs of the population, humanitarian actors have had to hastily adjust to working within new systems implemented by the de facto authorities (DFA).³ Strict international sanctions on dealings with elements of the newly formed government meant that international actors faced complex legal impediments to channel funding to their local and national counterparts and ultimately deliver support to the people in need.

As the context continues to change, many local and national humanitarian actors working in partnership with international organisations struggle to access funding, design projects locally, and implement programs in partnership with international organisations. As donors, United Nations (UN) agencies, international non-governmental organisations (INGOs) and the broader humanitarian community navigate and shape new ways of working, prioritising localisation commitments has been challenging.

The likelihood of a long and drawn-out crisis compels donors, UN, INGOs and the broader humanitarian community to refocus on localisation priorities, with the strengthening of national/local non-state actors placed at the

centre of emerging response models. In doing so, it is essential that short and long-term thinking on aid and localisation in Afghanistan is informed by evidence from local and national actors.

Within this context, a consortium of INGOs engaged Humanitarian Advisory Group (HAG) to identify key challenges to and opportunities for supporting local leadership of crisis response in Afghanistan. HAG worked with local research partners in developing and delivering this research. National NGO partners of these INGOs were consulted on the guiding Terms of Reference (ToR), as were wider networks that included LNNGOs among their membership. This research was designed to inform and influence approaches to localisation in Afghanistan that centre the agency of LNNGOs and (in some instances) more diverse and informal forms of civil society and community structures working in partnership with INGOs.⁴ The report contains five primary sections:

- 1. Introduction:** presents the background and purpose of the research
- 2. Context:** situates the research in relation to relevant environmental factors faced by the research participants

3 Though the report primarily uses the term 'de facto authorities' (DFA), participants and secondary sources are quoted using alternatives (sometimes interchangeably) including 'the Taliban', 'current authorities', or the 'Islamic Emirate of Afghanistan' to refer to the same movement. However, this convention is not without problems relevant to localisation, as one participant pointed out: 'NGOs take on the same language donors speak, but NGOs need to be able to speak their own language' (Interview H10).

4 The extent and nature of INGO engagement with civil society beyond LNNGO partners differed significantly according to operating modalities.

3. Research approach: presents the research questions that underpin the study, the research design and methodology, and the effect of the research's limitations on the findings

4. Resisting circuits: highlights two paradoxical circuits in which many humanitarian actors have become caught as they navigate the challenges of the post-August 2021 operating environment, and shape agencies' decision making

5. Key findings: presents the themes that emerged from analysis of the data. Findings are categorised into four broad thematic areas, each of which is followed by relevant recommendations.

In summary, this report argues that humanitarian actors must become more adept at addressing short-term challenges with due consideration of their longer-term implications. Holding this tension is difficult, yet core to the integrity of previous commitments made by the international humanitarian community.

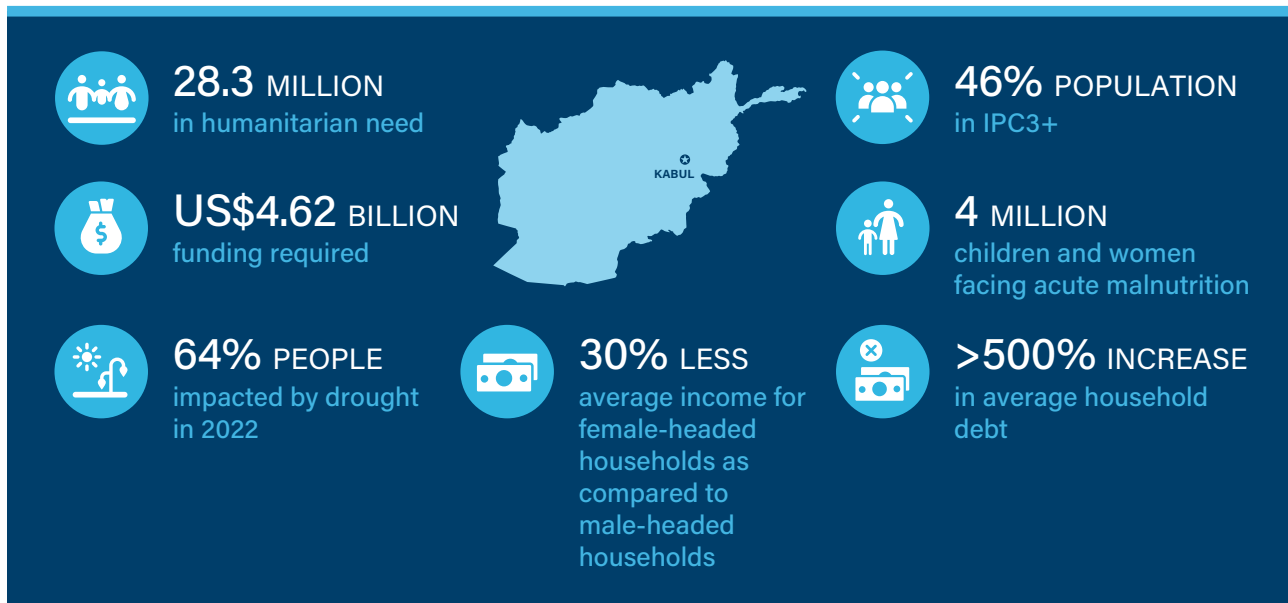
Photo: Mohammad Husaini on Unsplash



2 CONTEXT

The upheaval in Afghanistan following August 2021 had significant implications for humanitarian operations. Compounding effects of rapid socio-political changes, devaluation of the Afghani, COVID-19 and drought have increased demand for humanitarian assistance. An estimated 46% of the population face acute food insecurity in 2023.⁵

Figure 1: Humanitarian context in Afghanistan⁶



A STUDY BY CARE ON THE IMPACT OF THE FOOD CRISIS ON WOMEN AND GIRLS FOUND THAT:

Amongst ALL survey respondents **12%** of survey respondents reported early and forced marriage of girls



55% of survey respondents indicated that child marriage was one of the main safety and security concerns facing girls in their community

Amongst WOMEN survey respondents **19%** of women survey respondents reported that the humanitarian assistance they received had been adapted to meet their specific needs



97% of women survey respondents who received support and indicated support was not adapted, indicated that they were not able to report the issues to humanitarian actors

5 UN OCHA, [Afghanistan Humanitarian Needs and Planned Response 2023](https://reliefweb.int/report/afghanistan/afghanistan-humanitarian-needs-and-planned-response-2023-endarips), <https://reliefweb.int/report/afghanistan/afghanistan-humanitarian-needs-and-planned-response-2023-endarips>; IFRC (2022) [Afghanistan Humanitarian Crises Operation Update Report #6](https://reliefweb.int/report/afghanistan/afghanistan-humanitarian-needs-and-planned-response-2023-endarips), accessed 15 Dec 2022.

6 UN OCHA, [Afghanistan Humanitarian Needs and Planned Response 2023](https://reliefweb.int/report/afghanistan/afghanistan-humanitarian-needs-and-planned-response-2023-endarips), <https://reliefweb.int/report/afghanistan/afghanistan-humanitarian-needs-and-planned-response-2023-endarips>; CARE, [The Impact of the Food Crisis on Women and Girls in Afghanistan](https://reliefweb.int/report/afghanistan/impact-food-crisis-women-and-girls-afghanistan-november-2022), November 2022, <https://reliefweb.int/report/afghanistan/impact-food-crisis-women-and-girls-afghanistan-november-2022>; 'Crisis' level food insecurity refers to the [Integrated Food Security Phase Classification](https://reliefweb.int/report/afghanistan/impact-food-crisis-women-and-girls-afghanistan-november-2022).

As needs on the ground increased, both LNNGOs and international actors had to adjust to a new operational reality in Afghanistan. The collapse of the previous government gave the humanitarian community little time to put in place alternative arrangements to manage the emerging political and bureaucratic challenges. With strict sanctions applied on dealings with the newly formed DFA, humanitarian actors struggled to address the increasing needs of the population. These sanctions explicitly contributed to the pivot to humanitarian activities while constraining more developmental action. Major health programs that were critical for the COVID-19 response were put on hold, crippling operations across the country.⁷

While the United States (US), United Kingdom and European Union provided some licenses and guidelines to support the flow of aid in the immediate aftermath of the DFA coming to power, many international actors faced more difficulties in mobilising funds within the sanctions regime. It was only in December 2021 that the US government issued a broad authorisation to allow humanitarian actors, including the UN and INGOs, to work directly with the DFA in delivering aid⁸, followed by a UN Security Council resolution that enabled humanitarian actors to meet basic needs without violating sanctions.⁹ However, these did not provide solutions to all practical issues faced and operationalising of these waivers took time that further slowed response.

As the context shifted, donors redirected most long-term development funding to respond to immediate needs, primarily channelled through the UN and INGOs. For example, while the United States halted their development programmes in the country, they simultaneously, through the U.S. Agency for International Development (USAID) and the U.S. Department of State, provided nearly \$327 million in additional humanitarian assistance by as of September 2022.¹⁰ This additional funding brought U.S. support for Afghanistan to more than \$1.1 billion in humanitarian assistance since August 2021, including nearly \$812 million from USAID and nearly \$320 million from the State Department. The new operating environment in Afghanistan forced many NGOs, particularly local and national NGOs (LNNGOs), to switch focus from longer-term development to humanitarian funding modalities. In addition, the impact on local civil society of the exodus of thousands of citizens during the final stages of the international force withdrawal is yet to be fully understood. Many experienced NGO and civil society staff have left the country due to the fear of persecution and/or economic challenges.¹¹

As the situation on the ground has settled, reports and public announcements indicated DFA acknowledgement of the need for humanitarian aid to continue – as indicated by the appeal made by DFA Foreign Minister soon after the fall of Kabul (and repeated from time to time) from the international community to continue humanitarian assistance.¹² At the

7 Loy (2021) [Afghan healthcare under threat from international aid freeze](#), *The New Humanitarian*, accessed 23 Jan 2023; WHO (2022) [Afghanistan's health system is on the brink of collapse: urgent action is needed](#), accessed 23 Jan 2023.

8 As per [OCHA FTS data](#), the US has consistently been the biggest donor to Afghanistan's humanitarian response activities, with US funding making up 39.4% of received funding against the 2020 humanitarian response plan, and 23.4% of the funding received against the 2022 plan. In addition, US funding is also provided indirectly as contributions to various UN and INGOs that are potentially linked to programmes implemented in the country. Therefore, issuing of authorisations by the US government for humanitarian actors to work with the DFA has significant impact on funding being available for programme implementation.

9 Aljazeera (2021) [US issues 'broad authorisations' to enable aid to Afghanistan](#), accessed 12 Jan 2023; Aljazeera (2021) [UNSC adopts resolution to provide aid to Afghanistan](#), accessed 01 Dec 2022.

10 USAID (2022) [The United States Has Provided More Than \\$1.1 Billion To Respond To Humanitarian Crisis In Afghanistan Since August 2021](#)

11 Wazefadost and Jones (2021) [Afghanistan's upheaval is no excuse to ignore local aid promises](#), *The New Humanitarian*.

12 Xinhua (2021) [Taliban official urges int'l donors to continue humanitarian aid for Afghanistan](#)

same time, there were conflicting messages from DFA questioning the zeal behind such appeals as demonstrated by ban on women working in INGOs and UN agencies as well as creating hurdles in girls education. With the DFA assuming control of most of Afghanistan, some areas that were inaccessible prior to August have opened to both local and international actors

(at least in the short term). However, as the DFA settle into their positions, prior experience suggests that support for the distribution of aid will be influenced by local commanders.¹³ In that regard, it is important to note that views held and approaches taken by the DFA are not homogenous and will differ across the country.

Figure 2: Impact of the ban on women NGO and INGO workers in Afghanistan¹⁴

A RAPID IMPACT ASSESSMENT OF THE BAN ON WOMEN NGO AND INGO WORKERS IN AFGHANISTAN FOUND THAT:

ALL survey respondents **38%** said their organisation is not able to operate following the ban on women NGOs/INGOs humanitarian workers
48% said their organisation is only able to partially operate following the ban on women NGOs/INGOs humanitarian workers

Survey respondents from organisations that had to stop activities **32%** said that 100% of activities have had to stop
34% said that more than 70% of activities have had to stop
67% said the support they require is advocacy to overturn the ban

THE TOP THREE SECTORS AFFECTED WERE



1) EDUCATION



2) PROTECTION



3) FOOD SECURITY

¹³ Jackson and Giustozzi (2012) [Talking to the other side: humanitarian engagement with the Taliban in Afghanistan](#), ODI.

¹⁴ Gender in Humanitarian Action (GiHA) and Humanitarian Access Working Group. [Snapshot: Impact of the ban on women NGO and INGO workers in Afghanistan](#), accessed 31 Dec 2022.

Acknowledging that the operating environment is challenging for all humanitarian actors, the current context has placed especially high pressures on LNNGOs. Some small LNNGOs have already ceased operations due to insufficient funding, and some large LNNGOs are facing similar challenges. Funding freezes have restricted even some large national NGOs' ability to pay salaries and deliver support to communities. This problem is likely to continue in coming months as donors, UN agencies and INGOs look to national/local non-state actors to deliver work on the ground. The developments in December 2022 whereby the DFA suspended women's right to work with LNNGOs and INGOs (see page 10 on

Women's employment with NGOs) is another significant development that has implications for humanitarian organisations' operations and the delivery of assistance to affected communities. The overall operating environment is impacting both women-led organisation (WLO) and women's rights organisations (WRO), as well as the wider spectrum of LNNGOs. Importantly, an IASC mission in early 2023 found that it was cuts in donor funding in response to the political developments that were more decisive in leading to the closure of WLOs/WROs and their programmes, than the actual DFA policy decision itself.



Women's employment with NGOs

On 24th December 2022, the DFA suspended women's rights to work with LNNGOs and INGOs and participate in higher education.¹⁵ In response, several INGOs paused their programming (some of which have resumed in limited sectors such as health).¹⁶ Figure 2 provides a snapshot of the impact on NGOs one week after the ban was announced.

This decree was issued after data collection for this project had been completed, but before publication. Thus, the perspectives offered by study participants do not reflect this significant development or its implications on localisation programming in Afghanistan. In reading this report, and particularly the findings and recommendations, it is advisable that this important contextual development and how it relates to the report findings is considered.

This is not the first time that restrictions on women's employment with NGOs or access to higher education have been enacted in Afghanistan; similar restrictions existed prior to the US and its allies' invasion in 2001. As with previous iterations, the DFA's attempts 'to define, restrict, and control female employment within aid agencies should not be viewed in isolation', and reflect a much broader historical context of power dynamics and conflict.¹⁷ To enable LNNGOs to navigate the consequences of the DFA ban on women working in the aid sector, a shift to longer-term funding has been identified as a top priority to enable both LNNGOs, and their international partners, to plan for different scenarios, make the necessary investments and negotiate for acceptance for their adapted programming over time. The political imperatives that donors or international agencies feel to respond to the DFA bans, potentially including articulating red lines and considering closure of programmes and exit from the country, need to be weighed against pragmatic approaches to sustain support to adaptive programming led by LNNGOs able to respond to the changing situation on the ground across the country

- 15 ICRC (2022) [Afghanistan: ICRC deeply concerned for millions of women and girls](#), accessed 28 Dec 2022; BBC (2022) [Afghanistan: Taliban ban women from working for NGOs](#), accessed 28 Dec 2022; UN Women (2022) [Statement: The decree barring women in Afghanistan from working in non-governmental organizations is yet another stark violation of women's rights](#), accessed 28 Dec 2022.
- 16 CARE, NRC, Save the Children & World Vision (2022) [A ban on female aid workers in Afghanistan will cost lives, warn leading aid groups](#), accessed 23 Jan 2023; Al Jazeera (2023) [NGOs resume some Afghan operations with women workers](#), accessed 23 Jan 2023; Save the Children (2022) [Save the Children resumes some activities with female staff in Afghanistan](#), accessed 23 Jan 2023.
- 17 Fielden and Azerbaijani-Moghadam (2001) *Female Employment in Afghanistan: A Study of Decree # 8*.

3. RESEARCH APPROACH

RESEARCH QUESTIONS

The research sought to analyse the ways in which socio-political upheaval in Afghanistan has affected programs and mechanisms designed to promote local leadership, as well as opportunities for improved support outcomes. Of particular interest was how ‘funding modalities and partnerships between international and national/local actors being established in Afghanistan [should] be framed and implemented to most effectively support national and local NGOs; leveraging their strengths in community-based programming, access to hard-to-reach areas and contextual understanding’.

The research team sought to answer the following questions, which formed the basis for key informant interviews (KIIs) as listed in Annex A:

- ▶ *What are the key challenges and opportunities that national/local NGOs would like to highlight in terms of the funding and partnerships available from international agencies – UN agencies and INGOs – and their approach to equitable partnership and support to local leadership?*
- ▶ *In particular, how do partnership approaches affect the availability of support for community-led programming, overhead costs, local agency, and capacity exchange and strengthening?*

DEFINITIONS

Definitions of key terms in this report are outlined below to support shared understanding. If no agreed definitions are available in the literature, components of existing concepts have been combined to form a definition for the purposes of this study.

Local leadership: this term along with ‘locally led’ and ‘community-led’, as they relate to humanitarian action, are used through this report to emphasise the importance of recognising (and respecting) local humanitarian action and that humanitarian action needs to be owned and led from the ground up. The term ‘**localisation**’ means respecting, recognising and strengthening local leadership.¹⁸

Donors: institutions, organisations or agencies (including governments) that fund humanitarian and development actors.

Funding modality: a mechanism or manner in which humanitarian action is funded, and through which funds are delivered and/or experienced.

Intermediary: organisations, networks or mechanisms acting in an intermediary role between donors and local implementing organisations.

National and local non-state actors: relief organisations that are headquartered and operating in their own aid recipient country and which are not affiliated to an INGO network, confederation or alliance. In general, such organisations are referred to as local and national NGOs (LNNGO) in this report. When this also

18 This definition is adapted from Gingerich et al. (2017) and Barbelet (2019). This report refers to local leadership in humanitarian action or locally led humanitarian action in most instances. References to the process of supporting local humanitarian action rely on the following definition of localisation: ‘Localising humanitarian response is a process of recognising, respecting and strengthening the leadership by local authorities and the capacity of local civil society in humanitarian action, in order to better address the needs of affected populations and to prepare national actors for future humanitarian responses’ (OECD [2017], [Localising the response](#), p.1).

includes networks of local and national NGOs the term used herein is 'non-state actors'.

Partnership: the ways in which national actors, international actors and donors work together. This includes long-term, principle-based partnerships; short-term, project partnerships; implementation partnerships; non-operational partnerships; managing contractor partnerships; multi-year funding relationships; and any informal or formal partnerships between donors, international and/or local partners.

Pooled funding: Funding channelled through a pooled fund that local and national actors can access directly, such as Country Based Pooled Funds, START Funding or the International Federation of Red Cross and Red Crescent Societies' (IFRC) Disaster Relief Emergency Fund.

METHODOLOGY

The study followed a mixed methods approach, involving both qualitative and quantitative data collection (see Figure 3). Data collection tools were devised in consultation with the research steering committee.

Semi-structured KIIs were the core data source for the study. This approach facilitated the collation of rich, personal accounts of lived experience, appropriate for understanding and analysing different participant perspectives.

Interviews were conducted with stakeholders of the humanitarian sector in Afghanistan, including local/national NGOs, INGOs, UN agencies, donors, and networks, between November and December 2022. The KIIs were used to understand stakeholder perspectives on how changes to the operating environment have affected the humanitarian sector in Afghanistan and the challenges to and options for supporting local leadership of crisis response. Twenty-nine KIIs were conducted with a range of stakeholders including local and national NGOs, INGOs, UN agencies and networks. Interviews were conducted in English, Pashto and Dari.

Supplementing the KIIs, an online survey was conducted to capture perceptions of a variety of aspects of localisation in Afghanistan. A link to the survey was distributed to the relevant stakeholders from November 2022-January 2023 and their answers and comments were analysed using a combination of digital and manual qualitative coding.

Two sense-checking workshops were conducted, one involving Afghan LNNGOs and the other INGOs. These events enabled research participants to provide feedback on preliminary findings and gave opportunity for further reflection.

Figure 3: Research approach



LIMITATIONS

The following limitations relate to the collection of data and analysis of results.

Sampling: the research approach was designed to illuminate key emerging themes. The participant samples for the qualitative and quantitative components of this research are neither intended to be nor presented as statistically representative of national/local non-state actors and international actors operating in Afghanistan. The accounts reflect lived experience as described by individuals, and do not necessarily

reflect the experiences of all participants nor the positions of their organisations. The report does not capture all stories and experiences shared in interviews, but elevates those that describe points of commonality and divergence among the participants.

Geographic representation of stakeholders:

the research engaged organisations operating in multiple parts of Afghanistan. However, certain stakeholders were unable to contribute to the research in the time available, so the report cannot claim to reflect actors working across the entire country.

Representation of national/local women's organisations and gender representation overall:

Efforts were made to include women as participants, but it was not always possible to engage with women's organisations and female LNNGO staff while adhering to the 'Do No Harm' principle. The researchers integrated the views of women's organisations by using secondary data, such as the UN Office for the Coordination of Humanitarian Affairs' (OCHA) recent report on female participation in the humanitarian response in Afghanistan.¹⁹

Changing context: the context of aid sector operations in Afghanistan continued to

deteriorate over the course of the research. This included bans imposed on women working in NGOs and ensuing decisions by some actors to reduce or halt their activities. This decree was announced after the completion of the KIIs, so this ban is not reflected in the primary data. Thus, the report does not offer insights into how the ban has affected LNNGO operations. However, efforts were made to use secondary data to contextualise the findings.

Power and bias: the research needed to ensure that LNNGO representatives could raise sensitive issues without risk of backlash from donors or international agencies. Participants were informed that all data would be deidentified, and that report findings would not be attributable to individuals or specific organisations. Nonetheless, the contributions of individual participants may have been shaped by perceptions of risk or audience expectations.

Contextual sensitivity: in consideration of how the research and report may be perceived in Afghanistan, and the associated risks for LNNGOs and their staff, the researchers decided to focus on funding and partnerships between international actors and national/local non-state actors. Dissemination of findings should thus consider contextual sensitivities.

19 UN OCHA (2022) [Female participation in the humanitarian response in Afghanistan](#).

Photo: Zabihullah Habibi on Unsplash



4. CROSS CUTTING CIRCUITS

Throughout the research, humanitarian actors in Afghanistan described being caught in political, ethical and practical dilemmas that constrain their operations and increase obstacles to localisation. In many cases, participants described being unsure how to resolve these dilemmas without causing further harm. We call these dilemmas ‘circuits’, because of their negative cyclical nature and resistance to resolution, exacerbating challenges instead of mitigating them. Many interviewees from both INGOs and LNNGOs predicted that current short-term strategies and actions would have negative consequences in the longer term, but lamented a lack of alternative pathways, particularly in a rapidly changing operating environment.²⁰ Recognising these circuits is the first step towards developing ‘circuit breakers’ – practical steps that allow agencies to navigate challenges in the short term while opening pathways to longer-term action.²¹

CIRCUIT 1: DRAWING LINES IN THE SAND

In disagreements with authorities, some donors and INGOs took hard-line, fixed positions, often presented in moral terms as lines in the sand that cannot be crossed. Participants described these positions as driven by ethical imperatives, sensitivity to public perception, or both.

The most prominent dilemma subject to Circuit 1 is how to respond to, and whether to participate in, systems that place restrictions on women. A study participant from an international organisation, for instance, demonstrated this in stating plainly ‘We will not fund any program

that does not involve women’.²² This dilemma involves balancing the benefits of continuing programming (albeit at lower capacity) with the risk of perpetuating or cementing unacceptable norms in the longer term.

On one hand, such statements from influential organisations or individuals can carry enormous weight in the framing of issues, norms, processes and decision making. On the other, particularly when coupled with a high degree of publicity, this approach can lock in a static response, limiting space for creating alternative positive outcomes.²³ Despite recognition that INGOs are broadly much better placed to negotiate with DFA, several participants among INGOs discussed considerable reluctance to engage with the DFA on sensitive issues.²⁴ While drawing this conclusion, the research team acknowledges local actors have limited ability to draw international media or political attention when they face harassment from DFA, thus they are unlikely to take hard-lined and fixed positions as compared to many of the donors and INGOs.

“Most organisations don’t want to get involved with authorities. There is a lot of fear. [But the] Sanctions target 145 people – not the DFA generally. If you want to reach people without engaging the authorities: it’s not possible.” (Respondent from an international actor)²⁵

These dynamics reflect recent developments, but are also shaped by decades of international presence in Afghanistan. Humanitarian

20 Interviews H1, H3, H4, H6, H7, H9, G1, G3, G4, G5, G6, G8, G9, G10, G12, G15, G18, G20

21 Briggs (2007) *Tackling wicked problems: a public policy perspective*, Commonwealth of Australia.

22 Interview H6

23 Lederach (1997) *Building peace: sustainable reconciliation in divided societies*, United States Institute of Peace Press; Fisher, Ury and Patton (2012) *Getting to yes*, Penguin Books.

24 Interviews H3, H5, H4, H5, H7, G18

25 Interview H5

organisations in Afghanistan operate in a historical context of deep distrust between aid agencies and authorities. A 2012 study of relationships between the Taliban and aid agencies found that ‘there is deep and prevalent hostility towards aid organisations and a general difficulty in distinguishing between different actors’ among Taliban members, both in general and particularly at local levels.²⁶ From an INGO perspective, this can be difficult to entertain when humanitarian actions are well intentioned. But criticisms of INGOs are not solely on ideological grounds. ‘The Taliban who criticise aid organisations are also critical of their perceived lack of a principled approach and effectiveness.’²⁷ This speaks to the importance of INGOs being able to demonstrate their effectiveness and added value. It is important to highlight INGOs and other international actors at the global level emphasise their humanitarian principled approach, where the international humanitarian system emphasis principled humanitarian aid. On the ground in Afghanistan, from a political and social perspective, both the DFA and others in society perceive international humanitarian agencies in the context of wider social and political dynamics including alignment with the state-building and stabilisation strategies aligned to the previous governments.

Breaking the circuit

- ▶ **Invest in relationships with DFA:** recognise that positive outcomes are far more likely with increased trust, which requires relationships. Distinguish between relationships and condonement. It is a challenging task and would require continuous efforts from development actors.
- ▶ **Focus on interests, not positions:** organisations and individuals should consider whether their position on a matter reflects an underlying value. Approaching disagreements with DFA from a basis of interests rather than fixed positions can create space for alternative outcomes.
- ▶ **Value-based advocacy:** to create a more inclusive working environment and facilitate re-engagement of women in the workforce, advocacy with the DFA for rights (by using rights-based language while linking it with Islamic teaching to create the bridge with DFA values thus promoting basic rights for Afghans) and the upholding of humanitarian principles and the Core Humanitarian Standards may benefit from being more closely linked to underpinning values, norms, and language (see also Key Finding 4 on leveraging the role of faith-based organisations).²⁸

26 Jackson and Giustozzi (2012) [Talking to the other side: humanitarian engagement with the Taliban in Afghanistan](#), ODI, pg. iii

27 Jackson and Giustozzi (2012) [Talking to the other side: humanitarian engagement with the Taliban in Afghanistan](#), ODI, pg. iii

28 See for example approaches proposed in ICRC (2020), [The Roots of Restraint in War](#), which found that ‘An exclusive focus on [international humanitarian] law is not as effective at influencing behaviour as a combination of the law and the values underpinning it. Linking the law to local norms and values gives it greater traction.’ An example the report looks into the role of institutions and actors where the authors analyse the role of various actors and institutions in promoting restraint in war. This includes examining the contributions of military organizations, governments, international organizations, and civil society groups in shaping and enforcing humanitarian norms. It also highlights the importance of collaboration and coordination among these actors to enhance compliance and accountability. At the same time, the report critically looks into ethical considerations where the report delves into ethical considerations in warfare. It discusses philosophical perspectives on the justifiability of certain military actions, the protection of non-combatants, and the moral responsibilities of combatants. The report explores the moral dilemmas faced by soldiers and commanders and propose ethical guidelines for decision-making in the context of armed conflict.

Despite the overtly fixed nature of the lines in the sand, most research respondents – including several who represented INGOs that had publicly announced non-negotiable positions – emphasised the importance of strengthening lines of communication with authority figures and investing in those relationships. This explicitly included the DFA, but extended to communication with leaders such as elders and religious leaders. Participants emphasised that investing in relationship building is different to endorsement, and that the former is an essential enabler of humanitarian action. Some participants noted that INGOs and LNNGOs should refer to DFA figures carefully to avoid unconstructive associations – an approach that has had some success in other contexts.²⁹

“People were previously not willing to involve elders and religious leaders. But you need to involve them, even for women’s empowerment. They are not spoilers – [talking to them] builds their confidence.”
*(Respondent from an international organisation)*³⁰

Participants from LNNGOs offered examples of lateral thinking that, intentionally or not, reflected an alternative, well-established approach to managing the tension between maintaining integrity and investing in relationships with authorities. Such solutions tend to focus on values and interests rather than positions, opening space for constructive outcomes. Similarly, acknowledging conflicting views as a matter of ongoing, continual process rather than seeking a binary endpoint was seen to open space for creating alternative programming arrangements.³¹ Some examples of these

approaches and opportunities to progress are outlined in Section 5.

“It comes down to personal relations – talking to the Taliban.” *(Respondent from an international organisation)*³²

CIRCUIT 2: DEFAULTING TO DISTRUST

The matter of trust, and particularly the need to build trust, was raised repeatedly in the KII. This relates to relationships of multiple types and levels:

- ▶ Between aid organisations and the DFA (as discussed above).
- ▶ Between aid organisations and local communities.
- ▶ Among INGOs and LNNGOs (the focus of this study).

Freezes on long-term funding streams and a related heavy prioritisation of short-term humanitarian funding both partly stem from and worsen this circuit of distrust. Donors undertook this rapid pivot (see also Key Finding 2) largely to prevent the flow of funds to sanctioned parties, but it has at the same time been seen to worsen humanitarian need in the population and is likely to continue to do so in the longer term. The volatility has also had negative impacts on relationships between aid agencies. As international intermediaries continued to prioritise acute relief activities over development programming, participants from both international organisations and LNNGOs complained that projects based on rapidly-established partnerships lacked a foundation of mutual trust. As a result, decision making becomes less inclusive, reinforcing the dominance of international organisations

29 Sense-checking workshop 1; Haspeslagh (2021) The ‘linguistic ceasefire’: Negotiating in an age of proscription. *Security Dialogue*, 52(4) 361–379

30 Interview H4

31 Sense-checking workshop 1

32 Interview H3

with more direct access to funds but minimal presence among affected communities.³³

Interviewees from all categories of participating organisations stated that investment in trust-building measures was crucial in facilitating LNNGO decision making in the current context in Afghanistan.³⁴ Trust building becomes extremely complicated in settings where there are often conflicting values and the context of sanctions and (in some instances) mutual criticism is especially challenging.

Frameworks can guide the push for more accountable approaches from international humanitarian organisations – including donors, INGOs and UN agencies – which have committed to localisation principles. They include:

- ▶ Grand Bargain 2.0, including greater support for the leadership, delivery and capacity of local responders and the participation of affected communities in addressing humanitarian needs.³⁵
- ▶ Humanitarian–development nexus concepts, including funding that purposefully bridges acute humanitarian funding with long-term development funding.³⁶
- ▶ The European Commission Resilience Marker, which emphasises the essentiality of strengthening local capacities and adopting longer-term strategies.³⁷

Breaking the circuit

- ▶ **Demonstrate reliability with evidence:** counter the pivot towards short-termism with strong evidence for reliable, long-term programming. Invest in partnerships and support small LNNGOs to produce this evidence.
- ▶ **Remind international organisations of their commitments:** advocate for continued or renewed commitment to enactment of enduring principles and agreements. It includes the Humanitarian Country Team developing, adopting and then monitoring/reflecting on progress in an HCT Localisation Strategy with measurable indicators. The donors are required to adopt context-specific localisation strategies and translate these into the requirements outlined of any intermediary agencies that they fund. Finally, the UN agencies and INGOs as well adopt context-specific localisation action plans; framed in part to break the circuit on trust through longer-term partnership MoUs and reflection with local partners on progress and barriers faced in these.

33 Interviews H2, H3, H4, H6, H7, H9, H10, Sense-checking workshop 1, Sense-checking workshop 2. N.B. It is reasonably foreseeable that responses from LNNGO participants on the issue of trust may have been tempered by its inherent power imbalance.

34 Interviews H2, H3, H4, H6, H7, H9, H10, Sense-checking workshop 1, Sense-checking workshop 2.

35 IASC (2022) [The Grand Bargain 2.0](#), accessed 21 Dec 2022

36 FAO, NRC and UNDP (2019) [Financing the nexus: gaps and opportunities from a field perspective](#), accessed 21 Dec 2022.

37 European Commission (2022) [Resilience marker: general guidelines](#), accessed 05 Jan 2023.

5. KEY FINDINGS

This section presents the study's four key findings, each of which is unpacked and documented with regard to funding, capacity strengthening, and decision making in INGO–LNNGO partnerships. It also describes examples of the circuits outlined in the previous section, and their impacts. Detailed recommendations are provided at the end of each finding.

KEY FINDING 1: CHANGES TO THE OPERATING ENVIRONMENT FALL MOST HEAVILY ON AFGHAN LNNGOs AND STAFF

Funds transfer remains difficult amid the banking crisis

LNNGOs described the challenge of competing for funds given reduced banking capacity. The challenges of accessing cash in Afghanistan have been well documented, and despite some recent improvement, were a major source of frustration for LNNGOs over the last 16 months.³⁸ Transferring funds was especially difficult for small donors that had previously supported small LNNGOs.³⁹

The early months of DFA control presented a chaotic and complex financial environment for humanitarian actors operating in Afghanistan. A donor freeze on development funding (see also Key Finding 2), coupled with restrictions on financial transfers, left some LNNGOs unable to pay staff salaries. Participants described LNNGOs laying off staff due to lack of accessible funds. In contrast, while INGOs faced difficulty in transferring funds for programming, research

participants did not report that this harmed staff retention to the same degree.⁴⁰

“International NGOs are better placed and better set up with better connections to be able to solve those [financial] problems which I imagine would have been harder for national NGOs to do so.” (Respondent from an international organisation)⁴¹

In the early months of DFA governance, LNNGOs faced significant difficulties in securing funds from international donors due to the banking system collapse, which persisted for almost five months. Though some improvement occurred, both INGOs and LNNGOs reported continued extensive reliance on the *hawala* system to transfer funds into Afghanistan, incurring both high costs and inflated compliance risk.⁴²

Some LNNGOs did not receive funds allocated by World Bank and others to them before August 2021 due to banking restrictions and associated project closures. These LNNGOs reported spending considerable resources on development projects before they were halted due to the prevailing uncertainty. While the situation has reportedly improved, several LNNGOs described lacking the access to resources they once enjoyed, thus impacting them negatively. Conversely, the leadership teams of some LNNGOs identified that the financial environment, while difficult, created new opportunities for LNNGOs that remained operational.⁴³

38 Gall and Khuram (2022) [Between a rock and a hard place: multifaceted challenges of responders dealing with Afghanistan's humanitarian crisis](#), ICVA; Moret, E. (2022) [Life and Death: NGO access to financial services in Afghanistan](#), NRC. Interviews H1, H2, H3, H4, G4, G10.

39 Interviews H5, H7, G4, G10, G14, Sense-checking workshop 1.

40 Interviews H1, G3, G4, G8, G17

41 Interview G17

42 *Hawala* is an informal, largely honesty-based broker-to-broker money transfer network outside the international banking system; interview H1, G10, G14.

43 Interviews G1, G10

In addition to instability in the national banking system, international restrictions have created hurdles in transferring funds into and within Afghanistan. Though the banking situation has eased slightly since the early months of DFA governance (see Section), transfer of funds into Afghanistan remains harder than transferring funds domestically. Local organisations have led the way in developing new internal and external funds transfer mechanisms. Participants reported changes to the operating environment have largely been handled through local organisations adapting, with international actors slower to adjust.⁴⁴

“The banking situation has improved as compared to the initial months of this government, though this improvement is not satisfactory as the banking channels are not fully functional yet.” (Respondent from international organisation)⁴⁵

It is important to note, however, that funds transfer mechanisms adopted by local organisations have in some instances been a double edge sword. On one hand, it enables the continuation of operations in the face of prevailing banking challenges; while on the other, it also brings increased compliance risk.

At the time of this research, international organisations reported progress on the development of alternative funding arrangements. An example is the Area Based Approach for Development Emergency Initiatives (ABADEI), a digital payments platform developed by the UN Capital Development Fund for the United Nations Development Programme (UNDP).⁴⁶ The platform is ‘expected to include other humanitarian and development partners in adopting the digital delivery of cash transfers,

ultimately supporting greater financial inclusion and interoperability for financial services providers in Afghanistan.⁴⁷ However, none of the people interviewed for this report discussed the ABADEI system. As such, it illustrates a wider challenge that UN agencies have a limited number of partnerships with LNNGOs, and other LNNGOs that do not hold such partnerships do not benefit from such arrangements.

Bureaucratic obstacles limit LNNGO roles despite some security improvements

Some participants described Afghanistan prior to August 2021 as having two governments: one led by Ashraf Ghani (from Kabul) and the other, a shadow government, by the Taliban from former strongholds. For this purpose, those implementing field activities were negotiating access with both *de facto* and *de jure* authorities, which would therefore take longer. Access has improved significantly in the post-August 2021 environment, and access permission processes were reported by LNNGO participants to no longer pose a significant hurdle to program implementation. With a single authority, LNNGOs now have greater access to remote areas such as Kunduz, Kunar and Nuristan. However, notwithstanding the improvement in access conditions, some respondents voiced apprehensions regarding the perceived fragility of these security improvements.

“Security is good. However, LNNGOs and INGOs are afraid of any mishap as fear is there among humanitarian actors due to the prevailing uncertainty.” (Respondent from a local/national organisation)⁴⁸

Beyond access, bureaucratic obstacles continue to inhibit humanitarian work. A strong majority of INGOs and LNNGO respondents reported

44 Interviews H1, G4, G6, G10, G14

45 Interview G6

46 UNDP (2021) [New UN Development Programme emergency initiative to support Afghan people in need](#), accessed 23 Jan 2023

47 Ibid

48 Interview G11

that interference by authorities in day-to-day aspects of project delivery has increased dramatically in the last 18 months.⁴⁹ The greatly reduced presence of INGOs resulted in multiple LNGO partners of INGOs expressing a view that they shoulder the heaviest or at least disproportionate weight of the operating environment load. The DFA have amended laws governing NGOs in Afghanistan, in contravention of previously-established principles and conventions.⁵⁰ Participants also complained about restrictions being imposed on a range of pretexts, and by both local and central level (ministerial departments) leadership of DFA. Such 'interference' has been said to include demands to sign memorandums of understanding, DFA involvement in humanitarian assessments, recipient demands to provide sensitive information, and involvement in recruitment, among others.⁵¹ Though these restrictions are not new to humanitarian workers, the breadth of imposition was said to be unprecedented in Afghanistan. Participants shared that this creates an environment in which LNNGO can no longer operate effectively.⁵² This raises the possibility, as also shared by some LNNGOs, of complementarity/solidarity from INGOs who can support LNNGOs to deliver interventions and navigate some of the access challenges.

While all humanitarian actors in Afghanistan face challenges, experiences and conditions are strongly gendered. Even prior to the escalation of restrictions in December 2022, it had become difficult for female staff of both LNNGOs and INGOs to travel in the field. Restrictions on women's work were said to be more profound outside Kabul

and vary from province to province. Complaints about the misconduct of DFA personnel with female staff had reportedly increased in the last 16 months.⁵³ As a precursor to the December 2022 ban on women working in NGOs, the DFA brought in requirements for female staff to be accompanied by a male chaperone ('*Mahram*') to carry out their work in the community. Respondents noted that such restrictions on women's participation had been raised with various organisation and networks, including Agency Coordinating Body for Afghan Relief (ACBAR) and the United Nations Office for the Coordination of Humanitarian Affairs (OCHA), who are responsible for coordinating with LNNGOs, listening to their concerns, and escalating them to decision makers, including the Humanitarian Country Team (HCT).⁵⁴ As participants from an international organisation pointed out, this not only has moral implications but also carries increased financial cost, with implications for overheads funding (see also Key Finding 3).⁵⁵ Beyond engaging with *Muhram*, suggested workarounds for keeping women in the workforce included in healthcare or child-related programming.⁵⁶ If such approaches are taken they should be made in parallel with ongoing advocacy efforts – an approach which has found some success (see also Section on cross-cutting circuits).⁵⁷

As Figure 4 highlights, as at 12 December 2022 OCHA reported having led 'orientation' or 'humanitarian sensitisation sessions' with DFA in 306 out of 401 districts across 34 provinces. The intended impact of these sessions was to increase understandings of humanitarian action,

49 11/13 survey respondents who answered this question reported an increase in interference.

50 Islamic Emirate of Afghanistan (2022) *Decree on the suspension of women working in national and international non-governmental organisations (NGOs)*; Islamic State of Afghanistan (2022) *Decree on the suspension of women in education*.

51 OCHA (2022) *Humanitarian access in Asia-Pacific*, Regional Humanitarian Partnership Week 2022.

52 Interviews H2, H3, H4, H7, H9, H10, G3, G7, G8, G13, G14, G18.

53 OCHA (2022) [Female Participation in the Humanitarian Action in Afghanistan](#).

54 Interviews G5, G14, Sense-checking workshop 2.

55 Interviews H2, H9.

56 Sense-checking workshop 1.

57 Latifi, A (2023) [After the Taliban ban on women NGO work, local and foreign aid groups take different approaches](#), *The New Humanitarian*.

including managing DFA expectations, reduction in interference, and strengthen relationships.⁵⁸

Figure 4: Humanitarian orientation sessions



76% of districts have been covered by ongoing humanitarian orientation sessions led by OCHA

Though such sessions have reported some gains, all participants in this study who discussed staff mobility indicated that it presented a greater challenge for LNNGOs than their international counterparts. Participants stated that LNNGO staff were more consistently subjected to restrictions than INGO staff. Participants reported that UN staff had near-unrestricted movement in Afghanistan, but the staff of LNNGOs, especially women, do not.

Complaints regarding the misconduct of the authorities with the female staff have increased on a large scale. Albeit this is quite challenging for us, we have raised these concerns.... to discuss it with the current authorities." (Respondent from an international organisation)⁵⁹

Bureaucracy between DFA ministries and the relevant departments also affects the delivery of projects. Participants reported that it had become easier to obtain permissions for so-called 'hard' program components, such as livelihoods, than 'soft' components such as human rights, peacebuilding, or protection, gender, and inclusion activities.⁶⁰ However, 'hard' programming was not immune, with LNNGO participants describing DFA as 'sceptical of LNNGOs'.⁶¹

"Almost every other day, we come across a new set of regulations from the de facto authorities, which are very restrictive and not very conducive to the working environment for humanitarian actors." (Respondent from an international organisation)⁶²

Delays in obtaining work permissions from authorities that impact aid operations also have implications for the power dynamics within partnerships and were reported to affect LNNGOs more severely than INGOs. In comparison with LNNGOs, other humanitarian actors, including INGOs but particularly UN agencies, were viewed by LNNGO participants to be relatively well-facilitated by the current regime.⁶³

"Gaining a work permission under the new regime is quite a cumbersome process. As Taliban authorities are generally sceptical of LNNGOs, they take time in awarding permissions." (Respondent from a local/national organisation)⁶⁴

Analysis of the KIIs showed that delays in obtaining work permissions exacerbate the ongoing funding issue for LNNGOs, because the current dominance of short-term humanitarian funding has associated timeframes of only three to four months. This increases pressure on LNNGOs to utilise these financial resources rapidly. Meanwhile, all LNNGOs are required to sign a memorandum of understanding (MoU) with the DFA – a process that typically takes around three months. Hence, LNNGOs often find themselves in a dilemma as to whether to pursue alternative funding or wait to sign an MoU with

58 OCHA (2022) *Humanitarian access in Asia-Pacific*, Regional Humanitarian Partnership Week 2022.

59 Interview G14

60 Interviews H1, H3, H5

61 Interview G7

62 Interview G13

63 Interviews G3, G7, G13, G18

64 Interview G7

the DFA. It is also important to highlight longer-term funding and longer-term partnerships enables LNNGOs to better negotiate MoUs with DFA and may even require less number of MoUs as a single MoU will cover longer period of time instead of multiple MoUs for shorter period projects.

Information extraction with little strategic support in return

Reduced presence of international actors – particularly donors – in Afghanistan has been damaging to partnerships and coordination with LNNGOs. Donors closed their embassies and exited Afghanistan, and many cite concerns over not putting LNNGOs at risk through direct dialogue. Some continue to work with LNNGO through remote means while other started engaging through intermediaries. With reduced presence, relationships crucial to identifying and developing strategic approaches to complex issues became more challenging to maintain. LNNGOs have been subjected to a high amount of uncoordinated data extraction processes to feed the thinking and decision making of international actors as they look to plan their own approaches. This has added more pressure to already-stretched LNNGOs, whose staff are often consultation fatigued and rarely compensated for their contributions and time. Critically, despite their input and continuous engagement, the strategic decision-making processes that stem from this data extraction are usually managed outside of Afghanistan by international organisations, or even when done in Afghanistan restricted to senior international staff. Data collected prior to the additional restrictions enacted in December 2022 showed little indication of a strategic approach by international organisations to restrictions imposed by the DFA on women, leaving local organisations and staff to navigate this ethical challenge with limited support.⁶⁵

Recommendation 1: More equitably share the burdens of the operating environment in INGO-LNNGO partnerships.

- a. INGOs and donors (in partnership with LNNGOs) should **explore creative and sustainable options to support LNNGOs to face challenges in the operating environment**, focusing on:
- ▶ Engaging women in the workforce in alternative capacities, such as working from home or in alternative roles, while maintaining advocacy efforts.
 - ▶ Identifying opportunities to link rights-based approaches with religious teaching in order to generate greater buy in, and also present it as needs of the communities
 - ▶ LNNGOs securing MoUs with the DFA to reduce delays in project approvals with the support of INGOs and donors. One possible way to achieve this is to provide longer-term funding linked to longer-term partnerships with LNNGOs as a strategy to help avoid having to repeatedly seek new MOUs for many short-term projects.
 - ▶ Jointly advocating on bureaucratic obstacles at different levels of government. This joint advocacy between UN and INGOS remains a challenge due to breadth of stakeholders as well as priorities that may not always fully align. This can often compromise the joint priorities based on individual or collective bargaining decisions. Collaborating with NGOs in joint advocacy efforts also requires coordination, resource allocation, and agreement on goals and strategies. The organisations also have their own systems and processes for decision-making and implementation, which may not align easily with those of NGOs.

65 Interviews H4, H6, Sense checking workshops 1 and 2.

- b. Donors, UN and INGOs should **ensure that LNNGOs are at the table when making decisions that affect them.** Compensation for ongoing consultations and information extraction should be considered as an ongoing practice.
- c. All humanitarian actors should contribute to **strengthening agreement on what fund transfer mechanisms are acceptable.** Agreement on acceptable mechanisms can help to reduce the exposure to compliance risk that LNNGOs face disproportionately.

KEY FINDING 2: FOCUSING ON EMERGENCY HUMANITARIAN RESPONSE HAS REDUCED SUPPORT FOR LOCALLY LED PROGRAMS

A funding pivot towards humanitarian action favours international organisations

Participants from both INGOs and LNNGOs described major difficulties due to a stark pivot away from medium-long-term development funding to short-term humanitarian funding (see Figure 5). Most participants saw this as a direct result of well-known donor-imposed funding freezes designed to restrict the flow of money to the DFA.⁶⁶ Figure 5 presents several of these perspectives.

Figure 5: Participant perspectives on short term funding ⁶⁷



With the stemming of development funding streams, one of the main remaining avenues for funding support was OCHA's country-based pooled fund – the Afghanistan Humanitarian Fund (AHF). The AHF saw a sizable increase in allocations from 2021, with USD 165 million allocated in 2021 and USD 300 million in 2022, compared to USD 73.4 million in 2020.⁶⁸ Data from the AHF encouragingly shows that funding

66 ICRC (2022) [Afghanistan: ICRC deeply concerned for millions of women and girls](#), accessed 28 Dec 2022; BBC (2022) [Afghanistan: Taliban ban women from working for NGOs](#), accessed 28 Dec 2022; UN Women (2022) [Statement: The decree barring women in Afghanistan from working in non-governmental organizations is yet another stark violation of women's rights](#), accessed 28 Dec 2022.

67 Interviews G1, H1, H4, H6, H7, H9

68 OCHA, [Country Based Pooled Funds Data Hub](#)

directly allocated by the AHF to LNNGOs has increased considerably in both absolute and relative terms across 2020-2022 (see Table 1) – reversing a trend seen during 2017-2019.⁶⁹ This increase in allocation can be as a result of some of the development funds being redirected towards humanitarian activities as well as increased humanitarian funding allocation, from some donors.

Table 1: Funding allocations to LNNGO from AHF 2020-2022 ⁷⁰

Year	Total Allocation	Absolute allocation to LNNGOs	Relative allocation to LNNGOs directly from AHF
2020	USD 73.4 M	USD 6.1 M	8.3%
2021	USD 165 M	USD 29.6 M	17.9%
2022	USD 300 M	USD 56.5 M	20.7%

Yet despite a scale-up in pooled funding in-country, study participants reported that earmarking of this funding for acute emergency purposes, as well as difficulty accessing it, had decreased opportunities for locally based decision making. With more funding directed toward humanitarian activities, international organisations previously working on long-term development reported being more active in humanitarian programming, with implications for local organisations previously working in this area in terms of more competition and untested partnerships.⁷¹

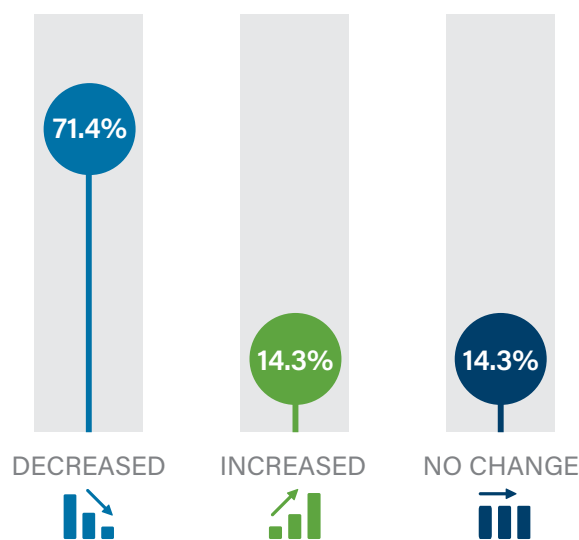
As more development funding was channelled in as humanitarian funding, 2022 humanitarian response plan received nearly USD 3.3 billion in funding (compared to just over USD 1.4 billion in 2021 across both the humanitarian response plan and the flash appeal). Based on data reported in OCHA’s Financial Tracking System, while the

absolute amount channelled to local and national actors (NGOs, CSO and private organisations) from this humanitarian funding increased in 2022, the percentage allocation dropped from 2.27% to 0.81%.⁷²

For INGOs, the pivot was primarily described in terms of limits placed on their ability to carry out development programming in country. For LNNGOs, the primary challenge described in association with this pivot was the difficulty of navigating complex and resource-heavy requirements to access the AHF, while at the same time being drained of administrative support to do so (see Key Finding 3).⁷³

Though restrictions on medium to long-term funding hampered operations for both INGOs and LNNGOs, the burden was seen to be disproportionately high on LNNGOs. Figure 6 presents participant understandings of changes to LNNGO funding allocations in partnership with INGOs since August 2021.

Figure 6: Reported changes in funding opportunities through partnership ⁷⁴



69 Ullah, Z., Ullah Khan, S. and Wijewickrama, E. (2021) [Covid-19: implications for localisation. A case study of Afghanistan and Pakistan](#). HPG working paper. London: ODI

70 OCHA, [Country Based Pooled Funds Data Hub](#)

71 Interviews H1, H3, H4, H6, H7, H10, G4, G8, G15.

72 OCHA, [Financial Tracking Service](#)

73 Interview G15

74 Survey data (n=14)

Decreased opportunities for local decision making

Respondents from both INGOs and LNNGOs reported that opportunities for local decision making in INGO–LNNGO partnerships are rare, with agenda setting dominated by international organisations. Notably, this was acknowledged even when the partnerships have a localisation agenda, expressed as frustration by operational staff that their organisation’s leadership did not adhere to localisation commitments already made.⁷⁵

Despite the existence of coordination platforms designed to strengthen localised approaches, LNNGOs reported inconsistent opportunity and little authority for decision making. Despite this, there was a perception among LNNGO respondents that they are better placed than INGOs to lead and implement projects in Afghanistan.⁷⁶

“Decision making rests with local/national NGOs on paper, whereas in reality donors dictate their terms.” (Respondent from a local/national organisation)⁷⁷

In this context, earmarking and changes to global funding priorities favour international actors. Interview responses revealed a severe lack of non-earmarked funding available in the country. Predominantly, funds distributed to LNNGOs through partnerships with international actors were understood to be project or budget line-specific allocations. As a result, LNNGOs described minimal agency to take their own initiatives outside specific projects initiated by international partner organisations.⁷⁸

Access to direct funding for LNNGOs from donors was reported to be rare, with most relying on partnerships with intermediaries such as UN agencies or INGO to access international funding (including AHF as noted in key finding 2).⁷⁹ LNNGOs reported better chances of securing funding from international donors once they partnered with INGOs, but also highlighted that that international partners take most of the support cost and pass on little to LNNGOs. In effect, this leaves LNNGOs with two options: to not seeking international funding, or to access it on terms that threaten their own sustainability.⁸⁰

Donor and INGO representatives acknowledged the power imbalance in their partnerships with LNNGOs and expressed a desire for change, although it was recognised that policy and practice in this area often differ widely.⁸¹ In one instance, a participant from an INGO said that their organisation’s internal management systems lacked agility, delaying the organisation’s response and thus their local partner’s response in turn:

“[Our] policies have got in the way in some cases ... The partnership model was used as a reason for [our organisation] *not* to set up its own processes. It doesn’t reflect the values of the organisation, and what we say we do publicly.” (Respondent from an international organisation)⁸²

Examples of this apparent lack of agility include inflexible policy frameworks governing the coverage of overhead costs and the lack of alternative financial mechanisms following the banking collapse. These issues were also seen to reduce LNNGOs’ ability to adapt to environmental

75 Interview H1, H6

76 Interviews G9, Sense-checking workshop 2.

77 Interview G8

78 Interviews H6, G5, G8, Sense-checking workshop 2.

79 Interviews H2, H6, G5, G8, G9, G15

80 Interviews H1, G15, Sense-checking workshop 2.

81 Interviews H1, H6

82 Interview H1

changes and capacity strengthening by partners, as discussed under Key Findings 1 and 3 respectively.⁸³

Influence and partnership opportunities remain skewed in the absence of INGO presence and support

For some participants, the opportunity for LNNGOs to make decisions about their own programs was perceived to have increased, seeming to counter the dominant view of decreased LNNGO agency. However, this was seen to be environmental rather than policy based, attributed to the void created by the departure of international humanitarian actors previously active in the development space in Afghanistan. In such cases, LNNGOs reported that an increase in decision making opportunity was a result of 'leaving behind local NGOs to lead decision making' on project design and evaluations.⁸⁴ This perspective illuminates an important distinction, whereby *opportunity* is not necessarily analogous to *support* or *agency*. With the exodus of donors and many INGOs from Afghanistan, LNNGOs reported reduced opportunity to create meaningful partnerships with international actors. Given that INGOs had minimal development funds (long-term) at their disposal coupled with the absence or minimal presence on the ground, LNNGOs missed out on opportunities to shape long-term planning and strategic thinking on the support provided.

Before the socio-political upheaval in August 2021, many donors maintained a head office in Kabul, giving them leverage to lead decision making. The closure of such offices led some local implementing partners to believe that the role of LNNGOs in decision making processes had increased. One LNNGO participant referred to their INGO partner's intentional lack of an office in Kabul as 'a good policy'.⁸⁵ However, this has not necessarily translated to all LNNGOs having an equal level of influence. It was most often larger

national NGOs that had a bigger footprint and avenues to engage with structures such as the HCT that were able to wield greater influence, drowning out smaller local NGOs. Similarly, as donors sought to establish direct partnership with LNNGOs due to reduced presence of INGOs on the ground, they chose LNNGOs that have strong capacity and wide footprints across Afghanistan. LNNGOs that are less established in these areas reported difficulty in broaching such partnerships. While such choices may be understandable when seeking to address immediate needs, they represent a short-term approach that may not be well suited to a situation of volatile and worsening conditions.

Recommendation II: Counter the decrease in locally led programming that has resulted from pivots towards short-term humanitarian funding.

- a. International intermediaries and donors should **invest in and establish processes that support local decision making and influencing that are independent of project funding timelines.** This can include providing resourcing for LNNGOs to engage in research and consultation processes; ensuring they are represented in decision making, ongoing planning, and coordination of short-term projects; and establishing direct feedback loops to key decision makers.
- b. INGOs should consider **engaging more LNNGOs for short-term humanitarian operations** to foster win-win situations for both entities, whereby LNNGOs benefit from increased opportunities in humanitarian work in Afghanistan, and INGOs close the gap created by a shrinking development portfolio.

83 Interviews G5

84 Interview H10

85 Interview H3



KEY FINDING 3: INTERNATIONAL SUPPORT FOR LOCAL ORGANISATIONAL SUSTAINABILITY & RESPONSE CAPACITIES HAS DECREASED

Overhead cost coverage remains non-adaptive and inadequate

Interview participants reported no substantive change in approach to INGO support for LNNGO overhead costs. This was also reflected in the survey findings where 45% reported a decrease or no change in the overhead costs coverage while only 25% reported an increase (see figure 7). One positive example is the UK INGO fundraising platform, the Disasters Emergency Committee (DEC) where it introduced for the first time a requirement that its member INGOs cascade overheads to their local partners, and report on this. However, the DEC has not (yet) set a minimum good enough guidance on what this overhead contribution should be. While there were some modest variations in INGO practice (discussed below), there was no observable change in how UN agencies covered overhead costs, as the overhead percentages remained the same before and after August 2021. The fact that increased support for LNNGO overhead costs was not especially evident despite the considerable contextual upheaval (including requirements such as *Maharam*, separate working spaces for men and women) is remarkable. While this again highlights how current global approaches to funding of overhead costs lack adaptability more broadly, it also highlights a missed opportunity from international actors in Afghanistan to step up to provide contextually relevant support to their LNNGO partners.



“There has always been very low overhead cost coverage for LNNGOs in Afghanistan, even during the previous authorities, it was very low. So, there is no marked difference in comparison with the past.” (Respondent from a local/national organisation)⁸⁶

In this case, LNNGO representatives shared their frustrations that a potential increase of administration and overhead costs was not even on the agenda of international partners, forcing LNNGOs to adopt potentially unsuitable practices to cover them. Reported practices include paying lower salaries than those budgeted and hiring cheaper, less appropriate vehicles to save on fuel and rent. LNNGO staff asserted that the absence of operational support from donors meant they had no choice but to reduce costs in such ways.⁸⁷

Approaches taken by international NGOs to the funding of LNNGO overhead costs were mixed. For some, coverage was policy based, while others reported ad hoc allocation of funding support for LNNGO overheads. Positives and negatives were reported for both approaches: policy-based approaches were seen to offer a degree of certainty, but in some instances locked in fixed and non-adaptive terms. Ad hoc approaches were presented as more adaptable, though this was dependent on the decisions of INGO financial managers.⁸⁸

“There’s a ceiling problem; overhead costs are confined to a percentage.” (Respondent from an international organisation)⁸⁹

86 Interview G7

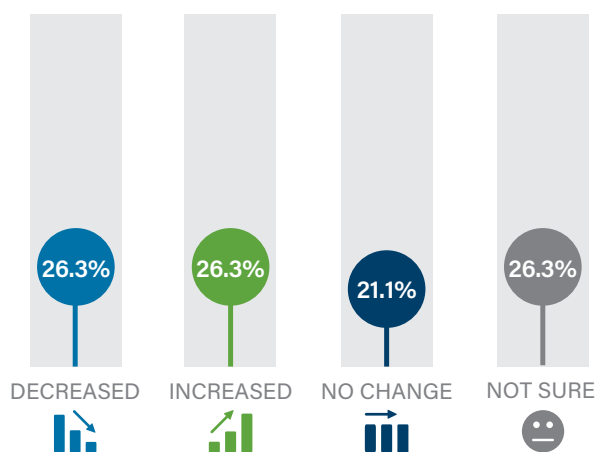
87 Interview G7, Sense-checking workshop 2.

88 Interviews H1, H2

89 Interviews H4

“We have to see if [support for overheads] is reasonable – we don’t have clear cut rules for this. It’s [based on] experience; it’s logic.” (Respondent from an international organisation)⁹⁰

Figure 7: Reported INGO coverage of partner LNNGO overhead costs since August 2021⁹¹



Of the responses presented in Figure 7:

- ▶ All ‘not sure’ responses were from INGOs.
- ▶ Five out of six respondents from international organisations understood overheads coverage to have increased since August 2021, while only one international respondent suggested that overheads coverage had decreased.⁹²
- ▶ There was little discernible difference in respondents’ perception of overheads coverage according to whether a partner was an INGO, UN agency, or other donor.

While these figures do not imply definitive or generalisable trends, they nonetheless illuminate areas for active scrutiny and strengthening. For instance, while the survey disaggregated respondent data on the basis of organisation

type, language and gender, it was not possible to identify correlations. An enquiry that disaggregates similar data according to policy approach may be valuable.

Data collected in both the interviews and survey in this study indicated that the coverage of participant LNNGO overheads through partnership with INGOs is neither consistent nor well understood. There appeared a widespread perception among LNNGO participants that overhead costs remain a significant burden, and that confidence in partnerships to provide this support in this area was severely lacking. This is consistent with reporting on overheads coverage by the Inter Agency Standing Committee (IASC), which names the ‘common practice of not advancing overheads to local and national partners’ as ‘unfair and at odds with commitments to support institutional development and capacity strengthening’.⁹³

Staffing drain adversely affecting LNNGOs

The departure of human capital from Afghanistan is one of the major fallouts of the DFA takeover and this brain drain is hindering the delivery of humanitarian operations. The sector has a huge demand for qualified professionals, but many have fled the country in pursuit of better careers and futures. The DFA are trying to encourage people to return to Afghanistan, promising no questioning or harassment, but to little avail with many of those who have left the country likely to harbour deep distrust of the DFA and its policies. The increasing restrictions imposed on female workers are compounding the problem, both by reducing the likelihood that women will choose to return and by sending a message that DFA positions are becoming less permissive, not more.⁹⁴

90 Interview H2

91 Survey data (n=20)

92 This respondent was from an INGO.

93 IASC (2022) [IASC Guidance on the Provision of Overheads to Local and National Partners](#).

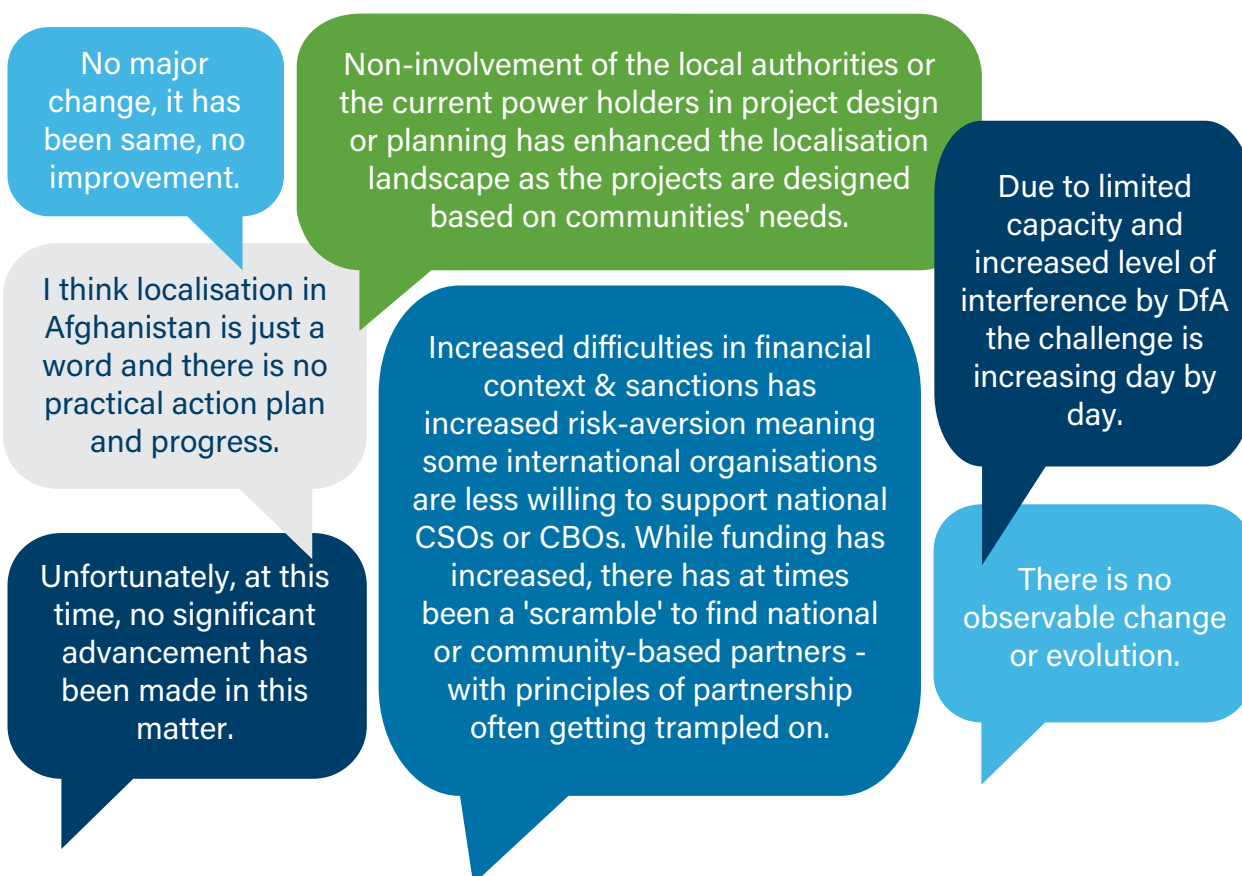
94 Interviews G1, G6, G13, G15, G18; The impact of ‘brain drain’ has been discussed elsewhere, for example, see Save the Children (2022) [‘ACBAR condemns the decision of suspending women from universities in Kabul’](#); Flacks M., Burke L., & Larnerd N.J. (2023) [The Taliban’s Increasing Restrictions on Civil Society and Aid Organizations’](#) Centre for Strategic & International Studies, 16 Feb.

“There is [a] demand–supply gap of qualified professionals in the country whereas the required human resources are seldom found due to brain drain.”
(Respondent from a local/national organisation)⁹⁵

The loss of personnel is placing strain on LNNGOs: as people leave the country, large humanitarian organisations replace these staff

members by recruiting from smaller ones. This again highlights the plight of smaller LNNGOs who are unable to match the benefits of international and larger national organisations and lose out on human capital they have invested in and developed prior to August 2021. This staff poaching practice, in some instances acknowledged by international actors yet nonetheless pursued, is not new to the sector but has been exacerbated in the current crisis.⁹⁶

Figure 8: Participant perspectives on how localisation has changed over the first 18 months since Taliban came in to power in August 2021⁹⁷



95 Interview G13

96 Interviews H5, H6, H7, H9, G13, G20

97 Responses to the survey question: 'In your view, how has the localisation landscape in Afghanistan evolved over the last 18 months?'

Reduced capacity strengthening by international partners

Participants from LNNGOs expressed concern that the commitment of international donors and INGOs to capacity strengthening in INGO–LNNGO partnerships is declining. Several participants reported that prior to August 2021, LNNGOs had many more opportunities for capacity strengthening in their partnerships with international organisations. However, reprioritisation of the humanitarian response has left little room for INGOs/donors to offer capacity strengthening programs for LNNGOs. Figure 9 captures some of the perspectives on capacity strengthening.

One respondent from an LNNGO shared that their organisation was a partner of a large INGO, which provided capacity strengthening programs, for many years. This support, however, was reported to have disappeared after the DFA takeover. There was also a strong perception among LNNGO participants that INGOs prefer to work with existing partners in Afghanistan with proven capacities than investing in building new partnership or supporting LNNGOs to build up their capacities and experience.⁹⁸

“All NGOs in Afghanistan have been busy in delivering humanitarian response since the fall of Kabul. So, the capacity-building element of local humanitarian partners has been neglected.” (Respondent from a local/national organisation)⁹⁹

Some participants noted that challenges bring opportunities, as with LNNGOs in Afghanistan whose capacities to face challenges and deliver projects have increased in the absence of international actors. These LNNGOs are now working more closely with INGOs in the field while delivering activities, which was not the case

before, generating more opportunities for on-the-job mentoring and training. These opportunities mostly relate to beneficiary selection and technical guidance in livelihoods and health interventions.

Figure 9: LNNGO participant perspectives on capacity strengthening

Opportunities depend on how open to information they [INGO partners] are; how much they are willing to listen. It needs to be discussed to come up with a fair distribution. But [with the pivot towards short-term funding] there isn't enough time to discuss budgets properly.

We have more implementation capacity than our INGO partners, frankly speaking. The difference is developed systems. The only thing we need are systems – for monitoring, financing, etc.

While capacity drain clearly emerged in the study as a significant challenge for humanitarian actors, some participants did identify efforts to counter it. Mentoring and coaching programs (as distinct from standalone workshops) by INGOs with long-term presence and relationship, ACBAR's 'twinning' program, and a willingness to invest in capacity strengthening *before* entering into partnership were each identified by participants as positive approaches that could be reinvigorated.¹⁰⁰

Moreover, drain was not always described in terms of implementation capacity, but also in

98 Interviews G5, G6, G9

99 Interview G6

100 Interview H4, H6, H9

terms of systems.¹⁰¹ The absorption capacity of LNNGOs was specifically raised by two INGO participants as an issue that can be overlooked in the short-term with negative long-term consequences. As with other capacity issues, this has been recognised as a problem that existed prior to August 2021 but has exacerbated

in the current crisis.¹⁰² LNNGO participants drew attention to unreasonable expectations of international donors “who want everything, and at the speed of light”, despite a lack of attention to having systems in place. This concern is tied to issues of relationships, trust, and timeframes, which recur throughout this report.¹⁰³

Recommendation III: Increase support for local organisational sustainability & response capacities.

- a. Donors and INGOs **should provide adaptable administrative and operational support to LNNGOs to cover costs and sustain operations.** This may include some or a combination of:
 - ▶ A lower-bound approach to overheads coverage, rather than a fixed percentage or figure.
 - ▶ An approach to overheads coverage that accounts for local currency fluctuations and/or inflation.
 - ▶ A dynamic approach to overheads coverage that allows for increased costs in times of upheaval, including in support of measures to keep women in the workforce.
 - ▶ There could be the adoption of Ethical Recruitment Guidelines at an HCT and individual agency levels, and that donors are encouraged to signal that they want to hear about and will take action if there are especially extreme instances of bad practices.

Donors and intermediaries should actively work to identify and address features of their policies and procedures that currently present obstacles.
- b. **Take action to counteract direct threats to LNNGO capacity. Specifically:**
 - ▶ A well-thought-out plan – informed by the perspectives of LNNGO staff – is required to **deter ‘poaching’ of qualified staff from LNNGOs.** This may involve creating incentives for staff working in LNNGOs, such as provision of training or recognition through performance awards. A compensation process can also be considered by international actors recruiting staff from LNNGOs to enable them to replace their lost resource.¹⁰⁴
 - ▶ **Donors and INGOs must improve the capacity of LNNGOs to offset brain drain.** Efforts are needed to reactivate and/or adapt previous capacity-building interventions.
- c. Donors and INGOs should **invest in capacity building with LNNGOs and work through them to increase localisation of humanitarian action.** This should entail more decision-making power for LNNGOs in terms of agenda setting and project design, followed by project delivery.

101 Interview H10

102 Independent Commission for Aid Impact (ICAI) (2022) [UK aid to Afghanistan – Country portfolio review](#), p.19

103 Interview H10

104 Kate Sutton (2018) [Aussie rules for humanitarians](#). DevPolicy Blog



KEY FINDING 4: THERE ARE VIABLE OPPORTUNITIES FOR INTERNATIONAL ACTORS TO SUPPORT, BUILD ON AND LEVERAGE LOCAL STRENGTHS

Improved geographical access for project implementation and monitoring

Both INGOs and LNNGOs reported better access to Afghan communities (in a geographic sense, not necessarily demographic) for project implementation and monitoring due to the improved security situation. Increased geographical access was similarly reported in earlier studies.¹⁰⁵



Increased geographical access ran counter to the project terms' assumption that actors are struggling to reach communities. Rather, increased access to communities was presented as a strength.

With improved security conditions, INGO and male LNNGO participants across all organisational levels of seniority reported improved feelings of safety, comfort and confidence in carrying out monitoring activities across Afghanistan.¹⁰⁶ These participants described little problem in reaching formerly remote or unsafe areas for monitoring, evaluation and learning activities. As a result, monitoring activity was said to have increased over the last year, including for senior staff of both INGOs and LNNGOs, with the outlook for monitoring and evaluation activities perceived as positive.¹⁰⁷

“Better security reflects well on monitoring activities which have increased since the de facto authorities assumed power, excluding initial five to six months which were very tough.” (Respondent from local/national organisation)¹⁰⁸

Improved security has allowed INGOs to access “all corners of the country”, which presents opportunities for capacity strengthening.¹⁰⁹ This may entail increased on-the-job mentoring and transfer of technical know-how in the field.

“There’s no reason that very competent local staff can’t be monitoring – except for time. It all comes down to long-term programming.” (Respondent from a local/national organisation)¹¹⁰

Leveraging role of faith-based NGOs and the private sector

Representatives of three different faith-based NGOs reported that a faith background enabled dialogue, engagement, trust building, and potentially even advocacy.¹¹¹ One participant described a greater degree of ‘community acceptance, and even a protective factor’ stemming from their organisation’s faith-basis.¹¹² This represents a pragmatic point of engagement that seeks to strengthen relationships between DFA and humanitarian professionals, with a focus on leveraging commonality. In doing so, it offers an alternative approach (potentially simultaneous) to the otherwise commonly held perception that closer engagement hinges on

105 Gall and Khuram (2022) [Between a rock and a hard place: multifaceted challenges of responders dealing with Afghanistan’s humanitarian crisis](#), ICVA

106 These improvements were described by male participants and should not be generalised to also extend to women. Moreover, the differences in mobility between women representing INGOs and women representing LNNGOs was not especially clear.

107 Interviews H1, H5, H7, H9, G10, G17.

108 Interview G14

109 Interviews G10, G14

110 Interview H6

111 Interviews H6, H9, H10

112 Interview H1

DFA adherence to humanitarian principles.¹¹³ This is not unique to Afghanistan and is an approach that has seen some success in other humanitarian contexts.¹¹⁴

Working with LNNGOs for focused engagement

Some LNNGO participants identified the relatively narrow scope of some LNNGOs as a strength, and one that INGO partners could leverage. It was argued that since INGOs – particularly large ones – often spread their resources across multiple sectors, authorities may hinder an organisation’s entire programme despite objecting to only

a part of it. An example was offered in which an organisation’s humanitarian agenda was hindered because of a parallel peacebuilding programme.¹¹⁵ Two INGO participants suggested that in such instances, INGO support to LNNGOs who engage in specific, targeted activities or themes rather than sector-wide programming may be a pragmatic means of carrying on activities more agreeable to DFA than others.¹¹⁶

Figure 10 presents examples put forward by participants on opportunities to improve the level of engagement of LNNGOs in ongoing and future responses in Afghanistan.

Figure 10: Participant perspectives on opportunities to improve engagement of LNNGOs¹¹⁷



113 Gall and Khuram (2022) [Between a rock and a hard place: multifaceted challenges of responders dealing with Afghanistan’s humanitarian crisis](#), ICVA.

114 ICRC (2020) [Islamic law and International Humanitarian Law: Common principles of the two legal systems](#)

115 Interview H4

116 Interviews H3, H6

117 Responses to survey questions: What can be done to improve the level of engagement of LNNGOs in ongoing and future responses in Afghanistan?

Recommendation IV: Act on opportunities to support, build on and leverage local strengths.

- a. All actors should **make the most of improved geographical access to invest in and build trust in relationships with DFA** across the country, recognising the heterogeneity of officials and taking opportunities to demonstrate effectiveness. This may include identifying targeted engagement that LNNGOs can undertake (with support) based on their visibility to DFA members at specific levels or locations.
- b. Acknowledge and **support the role FBOs can play in representing common interests of the humanitarian sector**. Leverage the strengths of FBOs to build relationships through projects and coordination fora.

Photo: Nasim Dadfar on Unsplash



Localisation in the Education Sector¹¹⁸

In early June 2023, the Ministry of Education (MOE) of DFA announced that all education activities implemented by international actors should cease within one month, with education programming to be handed to ministry-approved local or national NGOs.¹¹⁹ The MOE has stated that they see the role of INGOs as technical capacity building, grant management, fund mobilisation, monitoring, and supervision, not direct implementation; referencing how this is consistent with the global localisation agenda.

While there is a long history of cooperation with the MOE, concerns have been raised especially by international actors about the implications of this announcement. If the shift goes through, there are concerns it will impact more than 500,000 children (including 300,000 girls) who are currently able to access education from international agencies working both through direct implementation and different kinds of partnership with LNNGOs.¹²⁰

The situation is further complicated by wider political decisions taken by the DFA on education, including the restrictions on access for women and girls. These trends run contrary to building the necessary confidence with both international agencies and, importantly, their back-donors to enable or expedite any handover to local NGOs. Furthermore, it is unclear if the MOE has considered the complexity of the process as well as the capacity among LNNGOs to take over the work in such a short period.

The ability of LNNGOs to take over the activities and meeting the due diligence required by back-donors will depend on the institutional capacity-strengthening as well as the sector specific technical investments that have received from their international counterparts. Such handovers require long-term planning and targeted programming to enable a transition to LNNGOs taking lead. Unfortunately, while some international actors have been working towards this, others have not been operating on that basis.

It is difficult to make a direct comparison of this process to other transitions, such as the decision by the Indonesian government during the Sulawesi response to make a shift to working through local actors mandatory.¹²¹ This is primarily due to the vastly different operational contexts as well as the broader concerns raised about the DFA's intentions for this transition and track record on education. While giving due recognition to the complexity of the context in Afghanistan, it does raise two key points that need to be considered further by the international humanitarian community: a) the shortcomings in how international actors plan and approach long-term capacity building and transition planning; and 2) how the sector waits till it is forced into localisation by default (including shortage of funding) than moving towards it by design.

118 This section was added after the research report was completed to reflect the most up to date context in Afghanistan. The information for this was not covered in the primary data collection carried out for this research but has been sourced from a number of operational actors as well as publicly available resources.

119 Associated Press (2023) [UNICEF concerned by Taliban move to bar international groups from Afghan education sector](#), accessed 07 July 2023

120 Ibid

121 HAG and Pujiono Centre, [Charting the new norm? Local leadership in the first 100 days of the Sulawesi earthquake response](#), 2019

6. CONCLUDING REFLECTIONS

Throughout this study, it was evident that despite publicly-stated commitments of solidarity by their international partners, LNNGOs have often been left to largely fend for themselves amid a complex and worsening operational environment for humanitarian organisations. While there are undoubtedly variables that remain beyond the immediate control of international actors, there are at the same time internal pressures, fears, and procedural impediments to local leadership that exist within partnerships between international actors and LNNGOs that are yet to be adequately addressed. Some such challenges highlighted in this report are specific to the Afghanistan context, while others are also seen in other complex response settings and highlight a lethargy within the broader humanitarian system to actively pursue more responsive and effective aid.

Breaking out of the 'circuits' set up by pronouncing fixed positions and defaulting to distrust (as presented in Section) emerged as difficult but nonetheless crucial issues that should be addressed to facilitate sustainable support to the Afghan people. Strategies to balance short-term improvisation and longer-term anticipation in humanitarian action should be developed, with LNNGOs actively centred in these approaches.

Section highlighted concrete opportunities for consideration by international actors for providing greater support to LNNGOs – particularly through principle-based partnership approaches. Some of these recommendations would be vastly more impactful through collective action, while others can be actioned by individual organisations. Several recommendations add further weight to ideas that have already been highlighted through other research, as cited.

FURTHER RESEARCH AND ENGAGEMENT OPPORTUNITIES

While it was beyond the scope of this study, an application of either existing or newly developed localisation metrics tailored to the national or even sub-national context in Afghanistan may offer helpful benchmarking and facilitate the demonstration of progress effectiveness in humanitarian programmes and policy.

Specific to the coverage of overheads (although similar nuance may be insightful for other topics), data that either captures greater detail of an organisation's approach, or possibly a research design that names organisations while keeping individual respondents anonymous, could shed greater light on linkages between specific approaches to overheads coverage and their effectiveness and adaptiveness.

A readiness among international organisations to share mistakes would be highly valuable, not only for learning purposes but in demonstrating the negative impacts of short-termism and in doing so strengthen advocacy for longer-term programming. A study of this nature should be designed to facilitate a high level of data disaggregation while maintaining anonymity as necessary.

Finally, research that looks beyond Afghan LNNGOs to the needs of a broader cross-section of civil society would be a valuable addition to the literature. Such a study would illuminate humanitarian issues specific to those actors, but it would also serve to situate and present the challenges faced by LNNGOs in a broader and more contextualised operating environment than their relationships with international organisations.

ANNEX A: INTERVIEW QUESTIONS

Aspect	Key issues & research questions
<p>Overarching enquiry</p>	<p>What are the key challenges and opportunities that national/local non-state actors would like to highlight in terms of the funding and partnerships available from international actors, their approach to equitable partnership and support for local leadership by national/local non-state actors in the response?</p> <p><i>The overarching research question places primary value on the lived experience. It seeks first-hand experience of challenges and opportunities that research participants face in their current context. It also seeks participants' perspectives on the approach of international actors to partnerships with national/local non-state actors and their programming.</i></p>
<p>Availability of support for community-led programming</p>	<p>Key issue: Support for community-led/participatory approaches to programming and leveraging the specific contributions of national/local non-state actors to this.</p> <p>Research questions:</p> <ul style="list-style-type: none"> ▶ What challenges do national/local non-state actors face regarding funding from and partnerships with international actors for community-led / participatory programming? ▶ What opportunities do national/local non-state actors have regarding funding from and partnerships with international actors for community-led / participatory programming? ▶ How can the strengths of national/local non-state actors in community-based programming be maximised through support from international actors in the current context? <p><i>Questions are framed so as not to assume that international funding is accessible or advantageous in the current context, in order to address the key issue while creating space for alternative views.</i></p>
<p>Overhead costs</p>	<p>Key issue: coverage of overhead costs of the national/local non-state partner.</p> <p>Research questions:</p> <ul style="list-style-type: none"> ▶ To what extent are overhead costs for national/local non-state actors covered through partnership with international actors? ▶ What challenges and opportunities exist for covering overhead costs with support of international actors? <p><i>Establishes the current situation and emphasises that there may be a sliding scale of support which could be obscured by a binary “yes/no” question. Proceeds to unpack the dynamics of overheads coverage experienced.</i></p>

<p><i>Local agency</i></p>	<p>Key issue: support for leadership or co-leadership by national/local non-state actors partners in DM&E of projects and consortia; versus the treatment of national/local non-state actors as sub-contractors delivering on priorities identified by others</p> <p>Research questions:</p> <ul style="list-style-type: none"> ▶ To what extent are projects (co-)designed, implemented, and evaluated locally when in partnership international actors? <p><i>Establishes the current situation and emphasises that there may varying degrees of agency afforded to national/local non-state actors across their programs by partnership arrangements.</i></p>
<p><i>Capacity-strengthening / capacity exchange</i></p>	<p>Key issue: support for holistic and locally-led capacity-strengthening that strengthens national/local non-state actor partners towards goals of institutional/organisational development, sustainability and the ability to lead on programme/funding proposals, versus narrower forms of training centred on project delivery and meeting donor reporting requirements</p> <p>Research questions:</p> <ul style="list-style-type: none"> ▶ How much capacity exchange is there between national/local non-state actors and international actors, particularly around organisational sustainability and funding? ▶ How are decisions made about the different support national/local non-state actors are offered? <p><i>These questions are framed to both minimise pretence and adopt an agential lens.</i></p>