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SUPPORTING LOCAL ACTORS: EVALUATION OF SWEDEN'S APPLICATION OF THE GRAND BARGAIN LOCALISATION AGENDA

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Table of Contents

List of abbreviations

AAP	Accountability to Affected Populations
AHF	Afghanistan Humanitarian Fund
AHN	Arid and Semi-Arid Land Humanitarian Network
A4EP	Alliance for Empowering Partnership
CAFOD	Catholic Agency for Overseas Development
C4C	Charter for Change
CBPF	Country-based Pooled Fund
CERF	Central Emergency Response Fund
CIVSAM	Sida's Civil Society Unit
CRS	Catholic Relief Services
CSOs	Civil Society Organisations
DAC	Organisation for Economic Co-operation and Development Assistance Committee
DRC	Democratic Republic of Congo
EBA	Expert Group for Aid Studies/ Expertgruppen för biståndsanalys
ECHO	European Commission Humanitarian Aid Office
EHF	Ethiopia Humanitarian Fund
FAO	(UN) Food and Agricultural Organisation
FTS	Financial Tracking Service
HCA	Humanitarian Crisis Analysis
HCT	Humanitarian Country Team
HRP	Humanitarian Response Plan
IASC	Inter-agency Standing Committee
IATI	International Aid Transparency Initiative
ICVA	International Council of Voluntary Agencies
IFRC	International Federation of the Red Cross
ICRC	International Committee of the Red Cross

INGO	International Non-governmental Organisation
KII	Key Informant Interview
LNA	Local and National Actor
LNNGO	Local and National Non-governmental Organisation
MFA	Ministry of Foreign Affairs
NEAR	Network for Empowered Aid Response
NGO	Non-governmental Organisation
PBA	Programme-based Approach
RRM	Rapid Response Mechanism
Sida	Swedish International Development Cooperation Agency
SPO	Strategic Partner Organisation
TNH	The New Humanitarian
UN OCHA	UN Office for the Coordination of Humanitarian Affairs
USD	United States Dollars
WFP	World Food Programme

Foreword by EBA

At the Global Humanitarian Summit in Istanbul 2016, 66 agencies – UN and other intergovernmental organisations, donor countries, international civil society organisations – signed the Grand Bargain to 'get more means into the hands of people in need'.

Progress has been made along the Bargain's workstreams. The use of cash-based programs, harmonised reporting and joint needs analysis have increased, and humanitarian and development actors work somewhat better together. However, when signatories met to reconsider overall progress in 2021, they agreed in a "Grand Bargain 2.0" to focus on two lagging areas: access to timely and flexible funding, and the 'localisation agenda'.

The localisation agenda stems from the call for a 'participatory revolution'. Local and national actors are first to respond when crises hit, they know their local context, and they remain in place when others leave. Hence, increased influence of local actors over the design and implementation of responses would increase their effectiveness.

As Sweden continues to stress the importance of an effective international system for humanitarian assistance, and promotes localisation, it is important to know why progress has been weak in this particular area. This is why EBA decided to commission an evaluation of how Sweden has applied the localisation agenda.

We believe this report will be of use to Swedish policy makers, staff within the Ministry for Foreign Affairs and Sida as well as within those organisations that serve as intermediaries and implementors of Swedish humanitarian assistance. We also hope the report will be of relevance for other actors within the international humanitarian system. The study has been conducted with support from a reference group chaired by Johan Schaar, who previously served as vice chair of EBA.

The authors are solely responsible for the content of the report.

Stockholm, February 2024

Torbjörn Becker, EBA chair

Johan Schaar

Sammanfattning

Lokala och nationella aktörer (LNA) är först på plats när humanitära kriser inträffar, de arbetar kontinuerligt under krisen och de stannar kvar då andra lämnar. Trots det är de marginaliserade av ett internationellt humanitärt system som behåller kontroll över såväl inflytande som resurser, samtidigt som lokala aktörer ofta anlitas som utförare under svåra förhållanden.

Kraven på förändring kulminerade kring det globala toppmötet för humanitärt bistånd 2016. Sverige och många av dess samarbets-organisationer hör till de 66 aktörer som förband sig att arbeta för stärkt lokalisering genom 'Grand Bargain'-avtalet om humanitärt bistånd. 2021 konstaterades att otillräckliga framsteg har gjorts, och undertecknarna förnyade sina åtaganden. Den kvantitativs tydligaste bristen handlar om finansiering: 2022 gick endast 1,2 procent av det internationella humanitära biståndet direkt till LNA – mot det överenskomna målet på 25 procent.

Sverige är inte ensamt om att inte leva upp till sina lokaliserings-åtaganden. Men det brådskar att arbeta med frågan eftersom andra, inklusive USA och EU-kommissionen, nyligen har formulerat planer för påskyndade åtgärder. I skrivande stund var Sida i färd med att ta itu med detta: enheten för humanitärt bistånd har format en lokaliseringsgrupp som arbetar med att hitta vägar framåt.

Någon utvärdering av Sveriges tillämpning av sina lokaliserings-åtaganden har inte gjorts. Förutom korta och egenrapporterade bedömningar inom ramen för den årliga granskningsprocessen av Grand Bargain, finns det ingen kunskapsbas att bygga vidare på. Av det skälet har EBA beställt denna utvärdering.

Utvärderingen utgår från en definition av lokalisering som hämtats från Grand Bargain: "att göra principiella humanitära åtgärder så lokala som möjligt och så internationella som nödvändigt". Utifrån indikatorer som tagits fram vid tidigare bedömningar av lokalisering har utvärderingen utvärderat Sveriges framsteg i sex dimensioner:

Strategi: Lokalisering är en uttalad prioritet för Sverige. Däremot är inblandade aktörer mindre övertygade om hur åtaganden omsatts i operativa prioriteringar. Även om Sverige är mycket uppskattat som flexibel och inte detaljstyrande givare, finns breda förväntningar på att landet borde kräva mer av sina bidragstagare vad gäller framsteg kring lokalisering. Sverige har hittills saknat skriftlig policy och vägledning för att beskriva sina ståndpunkter och förväntningar. Detta har lett till att ambassader, Sidas humanitära enhet och UD har främjat lokalisering i olika grad och på olika sätt. Sidas pågående arbete med att ta fram en vägledning är därför välkommet, men det återstår att förankra detta inom Sida och UD.

Finansiering: Hindren för att skicka humanitärt bistånd direkt till LNAs är gemensamma för många givare. Det handlar om byråkratiska krav, legala frågor och tillgången på mänskliga resurser. Utifrån dessa har Sida nyligen påbörjat pilotprojekt för direktfinansiering till LNA:er.

Indirekt finansiering, via Sveriges internationella partners, har därför hittills varit det enda sättet för Sverige att fullgöra sina åtaganden inom Grand Bargain-finansiering. Stöd till landbaserade gemensamma fonder (CBPF) har varit en viktig del. Men enligt Sveriges egna uppskattningar utgjorde den totala indirekta finansieringen bara 17 procent av det humanitära biståndet 2022. Det är till stor del upp till samarbetsorganisationer hur mycket de skickar vidare till lokala aktörer och om de ska informera Sverige om detta eller inte.

Kvalitén på finansieringen till LNA:er är lika viktig som kvantiteten. Att få använda tillräckliga resurser för operativa omkostnader är mest prioriterat. Sverige har inte fastställt hur stor andel av LNAs omkostnader som samarbetspartnerna ska betala, vilket lett till stora skillnader.

Möjligheterna att öka både direkt och indirekt finansiering beror på Sveriges regler kring, och inställning till, risker. De ambitioner för ytterligare lokalisering som personal vid ambassader och samarbets-organisationer har bedömts stå i strid med vad revisorer och controllers säger.

Partnerskap: När Sida väljer ut och bedömer internationella samarbetsorganisationer är kvaliteten på deras samarbete med lokala aktörer en faktor. Det saknas dock tydliga kriterier för hur samarbetet ska se ut. Det görs inte heller någon systematisk uppföljning för att bedöma om LNA:er behandlas som jämlikar snarare än utförare.

Ett fungerande partnerskap med LNA:er förutsätter rättvisa och transparenta urvalsprocesser. Men även om samarbetsorganisationer kan ha tydliga urvalspolicyer, och även om FN:s samarbetsportal innebär ett stort steg framåt mot enhetliga urvalsprocesser, bedömer lokala aktörer att det fortfarande återstår en hel del.

Ett fungerande partnerskap att risker delas, särskilt de säkerhetsrisker som utförare utsätts för. Utvärderingen visar att internationella aktörer dock är mer bekymrade över "riskerna med" LNAs snarare än "risker för" dem. Mer fokus läggs på att mildra förtroenderisker för internationella organisationer och givare, än på att mildra säkerhetsriskerna för LNA.

Ledarskap och deltagande: Att stödja lokalt ledarskap i humanitär samordning och beslutsfattande blir mer centralt, ju mer Grand Bargain-agendan uppfylls. Den senaste årsrapporten beskriver stora förändringar när det gäller lokala aktörers inflytande. Det går inte att säga hur mycket av detta som beror på svenska insatser. Men svenska medel har i flera fall använts för att indirekt stödja LNA:s deltagande i beslutsfattande.

Utvärderingen visar att betydande hinder kvarstår för meningsfullt engagemang och inflytande. Språkfrågor, tidsbrist och knappa budgetar lyfts fram som praktiska hinder. Viktigare är dock motståndet mot maktdelning från vissa internationella organisationer. Det är kring sådant som Sverige skulle kunna använda sin position i styrelser och liknande för att se till att lokala aktörer får ökat inflytande.

Kapacitetsstärkande: På denna punkt gör svenska aktörer en annan bedömning än deras internationella samarbetspartners. Svenskarna menar att Sverige prioriterar stärkt kapacitet för lokala aktörer lägre än vad internationella bedömare tror. Möjligen tyder det på att det finns en spänning gentemot Sveriges primära humanitära mål "att rädda liv". Ansvaret för kapacitetsförstärkande har delegerats till internationella partners, men det bedöms inte vara något som Sverige aktivt efterfrågar.

Internationella partners arbete med kapacitetsförstärkning sker ofta top-down, kortsiktigt och dåligt samordnat. Fokus ligger främst på att stärka LNA:s kapacitet att uppfylla krav från internationella organisationer. Påtvingade krav på upprepade fortbildningar, rekrytering av lokal personal till internationella organisationer och liknande leder till att redan ansträngda lokala resurser undergrävs.

Många LNA arbetar med både humanitärt och långsiktigt utvecklingsarbete. Därför finns det goda möjligheterför givare att samverka mellan dessa båda grenar för att stärka lokal kapacitet.

Kunskap: Även om detta tema inte ingår i Grand Bargain, är kunskap om dynamik, framsteg och resultat av lokalisering nödvändiga för att bedöma och driva processen framåt. Sida stöder flera organisationer vars mål är att skapa kunskap och förståelse för lokalisering. Dock har en splittrad ansats minskat Sveriges förmåga att dra nytta av sina egna satsningar på lokaliseringsrelevant kunskap.

Merparten av internationellt finansierad forskning om lokalisering utförs av internationella experter och organisationer medan lokala och nationella experter oftare används för datainsamling. Sveriges strategi för forskningssamarbete lägger stor vikt vid lokalt ägande och jämlikhet i forskningen, detta borde det humanitära biståndet bygga vidare på.

Slutsatser

Sverige står inför några viktiga val för att bidra till en förändrad fördelning av makt och resurser mellan internationella aktörer och deras lokala och nationella jämlikar. Men att uppriktigt ta sig an utmaningarna skulle inte enbart hjälpa Sverige och dess partners, utan också ett bredare biståndssamfund.

Utifrån de sex utvärderade dimensionerna av lokalisering utkristalliseras fyra områden där Sverige behöver ändra sin normativa hållning, och tre områden där det behövs praktiska åtgärder.

Normativa skiften

- *Prioritera lokalisering.* Lokalisering är ett sätt att förbättra effektiviteten i det humanitära biståndet, särskilt i svåråtkomliga områden. Sverige bör göra lokalisering till en uttalad andra prioritet efter stöd till 'bäst placerade aktör'.

- *Balansera flexibilitet med tydliga krav.* Det är bra för en humanitär givare att vara flexibel. Flexibilitet kan frigöra resurser för investering i ökad lokalisering. Men för att utnyttja Sveriges möjligheter att driva på en omvandling krävs det att man blir tydligare med vad man förväntar sig av sina partners.

- *Anpassa riskhanteringen.* Sveriges upptagenhet kring "risker med" lokalisering måste kompletteras av en vilja att dela "risker för" lokala aktörer. Att systematiskt säkerställa ett ömsesidigt delande av säkerhetsrisker mellan samarbetsorganisationer och LNA:er borde vara ett särskilt etiskt krav för Sverige, med tanke på hur beroende man är av att lokala aktörer arbetar på de platser som är svårast att nå.

- *Förbättra hållbarheten.* Den finansiering som skickas vidare till LNA:er är i bästa fall årlig. Kortsiktigheten skapar en ekonomisk osäkerhet för dem. UD och Sida bör därför kräva och se till att samarbetsorganisationerna vidareförmedlar flerårigt stöd till lokala aktörer.

Praktiska åtgärder

- *Utnyttja Sveriges inflytande.* Sverige har ett betydande förtroende och inflytande på den humanitära scenen, ändå är Sverige påfallande tyst om lokalisering. Det finns möjlighet till ett kraftfullt svenskt ledarskap, men det kräver en ny nivå av engagemang från politisk ledning och UD.

- *Förbättra den interna samordningen.* Särkopplingen är uppenbar mellan lands- och huvudkontorsnivå, mellan UD och Sida och mellan enheter inom Sida. Givet att humanitära kriser blir alltmer utdragna, komplexa och begränsade, finns det ett tydligt behov av en samlad 'Team Sweden'-strategi för lokalisering.

- *Investera för förändring.* Investeringar kommer att krävas eftersom nya partnerskap och arbetssätt krävs. Sverige kommer att behöva se till att svenska samarbetsorganisationer har de medel som krävs för att stödja LNA. Detta inkluderar också hantering av säkerhetsrisker och kapacitetsförstärkning.

Utifrån dessa slutsatser riktas totalt 16 konkreta rekommendationer till UD och Sida. Dessa återfinns i avsnitt 8, Slutsatser och rekommendationer, i denna rapport.

Summary

Local and national actors (LNAs) are the first responders in humanitarian crises, and they are central to providing ongoing support and protection in the longer term. Yet they have been structurally marginalised by an international humanitarian system which has dominated power and resources while still relying on LNAs for last mile delivery.

Calls and promises for change culminated around the 2016 World Humanitarian Summit, including localisation commitments in the Grand Bargain on humanitarian aid. Sweden and many of its partner organisations are among the 66 signatories to this agreement. In 2021, signatories renewed their localisation commitments in recognition that insufficient progress has been made. Most quantifiable among the shortcomings is around funding: in 2022 only 1.2 percent of international humanitarian aid went directly to LNAs – against the agreed target of 25 percent.

Sweden is not alone in failing to live up to its localisation commitments. But there is an urgency for it to do better as others, including the US and the European Commission, have recently articulated plans for accelerated action. At time of writing, Sida was in the process of concerted action to address this: its Unit for Humanitarian Assistance had convened a localisation task team which was working practical ways forward.

There had been no evaluation of Sweden's application of its localisation commitments. Apart from brief and self-reported sub-missions to the annual Grand Bargain review process, there was no substantial evidence base on which to build future actions. The EBA commissioned the present evaluation in order to fill this evidence gap.

This evaluation adopts a definition aligned with that in the Grand Bargain, in brief: "making principled humanitarian action as local as possible and as international as necessary." Drawing on indicators set out by well-established measurement frameworks, the evaluation investigated Sweden's progress in six dimensions of localisation:

Strategy: Localisation is a stated priority for Sweden. However, stakeholders were less convinced how commitments translated into operational priorities. Although Sweden is highly appreciated as a 'hands-off' and flexible donor, there were widespread calls for it to be bolder in setting out requirements for its grantees to show progress on localisation. Sweden has hitherto had no written policy or guidance detailing its position and expectations. This resulted in inconsistent promotion of localisation between country teams, Sida's humanitarian unit, and the MFA. Sida's present efforts to develop guidance is therefore welcome but will require work to ensure effective uptake across Sida and the MFA.

Funding: Barriers that prevent direct channelling of humanitarian aid to LNAs are common to many donors: bureaucratic, legal, and human resourcing constraints. Noting these, Sida has recently embarked on a small set of pilots of direct financing to LNAs.

Indirect funding, via Sweden's international partners, has therefore to date been the only means by which Sweden can fulfil its Grand Bargain funding commitments. Support to the Country Based Pooled Funds (CBPFs) has been an important part. Yet according to Sweden's own estimates, the total indirect funding only accounted for 17 percent of its humanitarian aid in 2022. Once in receipt of funding, it is largely at the discretion of grantees how much they pass on to LNAs and whether to share details of their pass-on funding with Sweden or not.

The quality of funding to LNAs was deemed as important as its quantity. Adequate resourcing for operational overheads emerged as the most pressing priority. Sweden does not provide a set rate for how much overheads its partners should pass on to LNAs, which resulted in a high degree of variation.

Prospects both for greater direct and indirect funding are affected by Sweden's attitudes and regulations around fiduciary risk. Ambitions for localisation from country and partner programme staff were felt to be at odds with messaging from the audit and control functions.

Partnerships: Quality of partnerships with local actors is one consideration when Sida selects and assess international partners. However, there is a lack of clear expectation of what 'quality' looks like. Systematic monitoring to make sure that LNAs are treated as equals rather than implementers is also missing.

For increased partnerships with LNAs, fair, feasible and transparent partner selection processes become more important. However, while intermediary organisations may have clear selection policies, and while the UN partnership portal has heralded a major step forward in harmonising selection processes, LNAs voice concerns that there is still some way to go to ensure feasible eligibility requirements.

A hallmark of quality partnership is co-ownership of risk, particularly the security risks which local responders are most exposed to. Evidence suggest that international actors are more concerned with 'risks of' LNAs rather than 'risks to' them, placing more focus on mitigating *fiduciary* risks to international agencies and donors, than on mitigating the *security* risks to LNAs.

Capacity-strengthening: Swedish aid officials felt that this was a lower Swedish priority than their international partners did – perhaps indicating a tension with Sweden's primary 'lifesaving' humanitarian objective. Responsibility for advancing capacity-strengthening was delegated to international partners, and not something that Sweden appeared to actively demand or enable.

International partners' investments in capacity strengthening were often top-down, short term and ill-coordinated – focussing on building LNAs capacity to comply with international requirements. Indeed, the demands created by imposed and duplicative training requirements, and evidence of 'poaching' of local staff, had the effect of undermining rather than strengthening overstretched local resources.

Given that many LNAs span both humanitarian and development work, there is scope for better join-up of efforts to effectively strengthen local capacities.

Leadership and participation: As the Grand Bargain has evolved, support for local leadership in humanitarian coordination and decision-making remains central – and its latest annual report points to a general 'sea change' in terms of the influence of LNAs. Such change is hard to attribute to Sweden's efforts, but there are multiple examples of Swedish funding being used to indirectly support the participation and collective voice of LNAs, for which flexible funding had been instrumental.

Our research suggested however, that significant barriers remain to meaningful engagement and influence. Language as well as staff time and budget were raised as practical obstacles. More fundamental however was the resistance to power-sharing by some international agencies resistant to ceding control of decision-making. It is here that Sweden could use its position on advisory boards to advocate for greater access, influence and visibility for LNAs.

Knowledge: While this is not a specific dimension of the Grand Bargain, evidence on the dynamic, progress and outcomes of localisation is foundational to measuring and advancing progress. Sida does provide support for several organisations which have clear objectives to generate evidence and understanding of dimensions of localisation. However, a piecemeal approach has likely compromised Sweden's ability to capitalise and promote the uptake of its own investments in localisation-relevant knowledge and evidence.

The majority of internationally funded research on localisation is led by and attributed to international experts and organisations. Local and national experts are more likely to be used as sources of evidence or collectors of data than to drive the research agenda. That said, Sweden's strategy for research cooperation puts a strong emphasis on local ownership and equality in research, something which humanitarians could build upon.

Conclusions

To change the status quo in how power and resources are shared between international actors and their local and national equals, Sweden faces some important choices. Confronting these challenges boldly and openly will not only bring clarity and progress for Sweden and its partners but will also help the wider aid community to navigate their own pathways to localisation.

Cutting across the evaluated six dimensions of localisation, are the following four normative areas on which Sweden will need to decisively stake its position, and three practical areas in which it will need to take concerted action.

Normative shifts

- *Prioritising localisation.* Localisation is a means to the end of improving life-saving effectiveness, particularly in hard-to-reach areas. Sweden can elevate localisation to an explicit secondary priority after 'best placed actor'.

- *Balancing flexibility with assertiveness.* Being a flexible donor is good humanitarian donorship and flexibility may free up budgets to invest in localisation. However, realising Sweden's power to incentivise transformation will require it to be clearer about what it expects from its partners and to set specific ambitions for them to fulfil.

- *Adapting risk management.* The preoccupation with fiduciary 'risks of' localisation must be balanced with co-ownership of 'risks to' local actors. Systematically ensuring and enabling co-ownership of security risks between SPOs and LNAs must be a particular ethical imperative for Sweden, given its reliance on local actors to work in the hardest to reach places.

- *Improving sustainability.* Funding passed on to LNAs is, at best, annual – placing these organisations in financial precarity which further disempowers them. The MFA and Sida must therefore require and monitor the pass-on of multi-year benefits.

Practical considerations

- *Leveraging Sweden's influence.* Sweden has considerable 'soft power' on the humanitarian stage, but it is conspicuously quiet on localisation. It can demonstrate powerful leadership on localisation, but this will require a new level of engagement from the MFA backed by signals of support from the highest levels.

- *Improving internal coordination. D*isconnects were evident between country and HQ levels, between MFA and Sida, and between units within Sida. With humanitarian crises increasingly protracted, complex and constrained, there is a clear need for a more concerted 'Team Sweden' approach to localisation.

- *Investing for change.* Investments will be required as new partnerships and ways of working are required. Sweden will need to ensure that SPOs have the requisite funds to support LNAs, including for security risk management and capacity strengthening.

Based on the above, a total of 16 actionable recommendations are directed to the Swedish MFA and Sida. These are found in section 8, Conclusions and recommendations, of this report.

1   Introduction

National and local actors are central providers, and often first responders, in humanitarian crises. However, there are long-standing concerns that these actors have been marginalised or excluded by the international humanitarian system, which has dominated power and resources in the design and delivery of aid. Arguably, this is to the detriment of all: the effectiveness and efficiency of international response; the capacity and potential of local action; and ultimately, the relevance and sustainability of support to people affected by crises.

There are multiple reasons why the international system has historically failed to situate local and national actors (LNAs) at the centre of humanitarian response. The barriers to localisation vary between humanitarian actors and different operating contexts, but underlying power dynamics; a climate of risk aversion; political barriers, both within donor and recipient countries; and technical barriers, both operational and administrative, are all perceived to have hampered real reform (Robillard, S. et al., 2021; Barbelet, V. et al., 2021).

1.1 The Grand Bargain and localisation

Efforts to reform inequities within the international development and humanitarian systems have been ongoing for decades[1], and calls for the humanitarian system to be 'as local as possible, as international as necessary', gained particular momentum in the lead up to the World Humanitarian Summit in 2016 (United Nations, 2016). During the

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[1] Other commitments to increase local leadership within the humanitarian sphere include the Charter for Change (C4C), the Core Humanitarian Standard, the Principles of Partnership, and the Good Humanitarian Donorship principles (Robillard, S. et al., 2021). Other related (but distinct) discourses and processes include efforts to 'decolonise aid' and promote 'anti-racist' partnership approaches (ALNAP, 2023; Barbelet, V. et al*.,* 2021).

Summit, a range of initiatives were proposed to reform the international humanitarian system and support local humanitarian response. Key among these was the Grand Bargain – an agreement by a group of some of the largest humanitarian donors and organisations committed to improving the effectiveness and efficiency of the humanitarian action.[2] As of 2023, the Grand Bargain has 66 signatories, of which Sweden is one, as are many of the partner organisations receiving Sweden's humanitarian and development funding.[3]

Seven years on, the Grand Bargain has undergone several reviews and evolutions. Most recently, in June 2023, the signatories revisited the fundamental priorities and structures and proposed a set of revised objectives to address an updated set of challenges. Signatories have agreed to continue to support to localisation in the form of, "greater funding and support for the leadership, delivery and capacity of local responders" (Grand Bargain, 2023). This includes renewing the original commitments to increase quality funding to local and national actors (LNAs), with a target of at least 25 percent of funding reaching LNAs 'as directly as possible'; policies and procedures that enable equitable partnerships; and enabling the leadership and contribution of LNAs in humanitarian coordination mechanisms (Grand Bargain, 2023).

The Grand Bargain signatories have made some progress on localisation. The most recent annual independent review, underpinned by a process of signatory self-reporting, noted achievements in terms of LNAs playing a greater role in decision-making processes, including decision-making within the governance structures of the Grand Bargain itself, and more evidence of investments in the institutional capacities of LNAs (Metcalfe-Hough, V. et al., 2023). However, the independent review, as well as other reviews outside

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[2] See: https://interagencystandingcommittee.org/grand-bargain

[3] At the time of writing, the Grand Bargain signatories included 25 Member States, 25 NGOs, 12 UN agencies, two Red Cross/Red Crescent movements and two inter-governmental organisations.

of the Grand Bargain process, also highlight a lack of progress on several key indicators related to localisation, including access to funding. Most international humanitarian assistance continues to be channelled through international organisations (Metcalfe-Hough, V. et al., 2023; Robillard, S. et al., 2021; Baguios, A. et al., 2021) – according to the most recent estimates, only 1.2 percent (USD485 million) of the USD46.9 billion of international humanitarian assistance was estimated to have gone directly to LNAs in 2022 (Development Initiatives, 2023). Even allowing for problems counting indirect funding to LNAs via intermediary organisations[4], the gap between ambition and practice is stark.

Hopes that the COVID-19 response would catalyse more serious delivery on localisation commitments – given the international reliance on LNAs during the pandemic – did not materialise into transformative change. Evidence suggests that there has been no significant and long-lasting shift in resourcing and in power dynamics (Featherstone. A. et al., 2022; ALNAP, 2023).

Sweden's humanitarian assistance

The overall aim of Sweden's humanitarian assistance is to "save lives, alleviate suffering and maintain human dignity for the benefit of people in need who have been, or are at risk of becoming, affected by armed conflict, natural disasters or other disaster situation" (MFA, 2020). In order to achieve this, Sweden's strategy for humanitarian assistance identifies two main priority objectives, guided by the humanitarian principles of humanity, neutrality, independence, and particularly impartiality:

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[4] Intermediary organisations can be UN agencies, International non-governmental organisations (INGOs), other international humanitarian organisations, and in some cases national organisations based in affected countries, that receive funding from donors and pass it to LNAs, resulting in indirect funding from donors to LNAs (Grand Bargain Caucus on Intermediaries, 2022).

- Improved ability to provide protection and assistance for crisis-affected people.

- Increased capacity, effectiveness, and efficiency of the humanitarian system (MFA, 2020).

Sweden is a major provider of humanitarian assistance and has long ranked among the top ten donors of humanitarian assistance.[5] The volume of Sweden's humanitarian assistance – including humanitarian spending by both Sida and MFA – has grown considerably since 2016, increasing by nearly one third in that timeframe (see Figure 1).

Figure 1: Total Swedish humanitarian assistance, 2016–2022
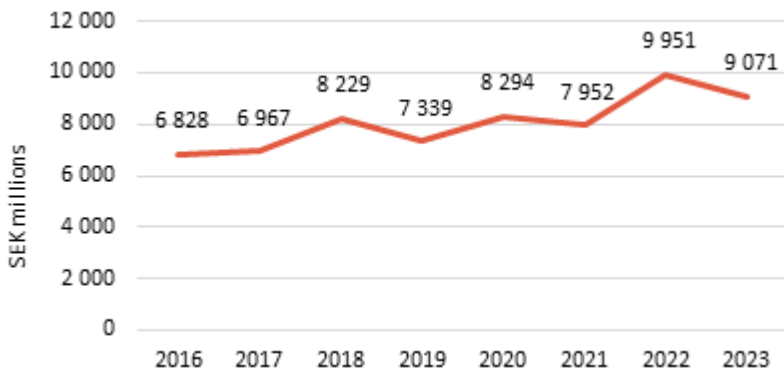
Source: Data provided by Sida, November 2023. Data for 2023 is preliminary and may be subject to change.

Swedish humanitarian assistance is channelled through both the Swedish Ministry for Foreign Affairs (MFA) and the Swedish International Development Cooperation Agency (Sida). The MFA provides core, unearmarked support to UN agencies and the Red Cross Red Crescent,[6] and channels funding through the UN's

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[5] Global Humanitarian Assistance Reports produced by Development Initiatives between 2014 and 2023 include Sweden in the group of top ten humanitarian donors in every year within the last decade.

[6] ICRC, IFRC (including the Disaster Relief and Emergency Fund) and the Swedish Red Cross.

Central Emergency Response Fund (CERF). At the same time, Sida provides targeted humanitarian funding to the same agencies for specific emergencies, and to international NGOs. Sida also provides funding to UN-managed Country-based Pooled Funds (CBPFs), which in turn support a variety of international, national and local humanitarian organisations to deliver in-country responses. Figure 2 provides a breakdown of combined humanitarian funding from Sida and MFA by organisation type.

Figure 2: Breakdown of Swedish humanitarian assistance by organisation type, 2016–2022
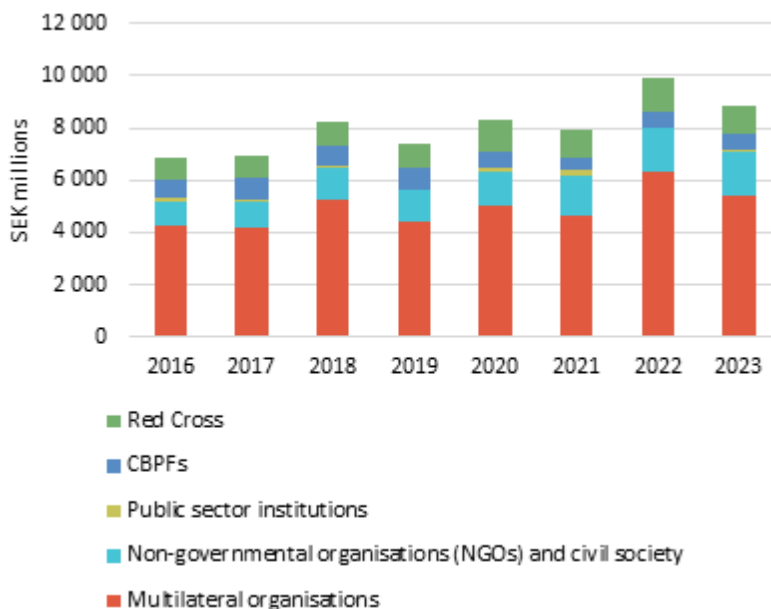
Source: Data provided by Sida, November 2023. Data for 2023 is preliminary and may be subject to change.
Note: Public sector institutions refers to the Swedish Civil Contingencies Agency.

Sida's humanitarian funding is unlike its development assistance in that it is managed directly from the Unit for Humanitarian Assistance in Stockholm – whereas the development budget for a particular country is normally managed by the development

cooperation team in the Swedish Embassy in that country[7]. There is usually a staff member in the Embassy development cooperation team with some responsibility for humanitarian assistance, who will provide a connection between the in-country response, and the staff at the Unit for Humanitarian Assistance who hold the budget and oversight for specific geographies and organisations.

The geographic distribution of Sida's humanitarian funding is reassessed on an annual basis at both global and crisis level. Each year, a global needs analysis is conducted to inform principled needs-based allocation, based on prioritisation of severity[8]. At a crisis level, the Humanitarian Crisis Analyses (HCA) for each context bring together quantitative and qualitative analysis of the severity and scale of need and existing response capacity – to provide a rationale for the size of the allocation and the organisations Sida will partner with to deliver the response. Approximately 90 percent [9] of Sida's humanitarian budget is allocated within the first quarter of the year through the HCA process, and decisions on flexible funding, with the remaining amount set aside as an emergency reserve for allocations to new and worsening humanitarian situations through the rest of the year (Sida, 2020).

Much of Sida's humanitarian funding is channelled through its Strategic Partner Organisations (SPOs) in the form of multi-year cooperation. Within the framework of long-term agreements, SPOs then take part in Sida's annual allocation process and are also eligible

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[7] The development budget managed in-country is that steered by the bilateral strategy for that country, and Sida teams in Stockholm also manage development assistance steered by regional and global strategies where they apply in specific countries.

[8] In 2023 Sida's global analysis methodology was updated with the aim to provide a more detailed and proportional understanding of needs across crises.

[9] Of this 90 percent, approximately 20–25 percent is flexible funding, including the Rapid Response Mechanism (RRMs) to INGOs, unallocated funds to multilateral organisations (ICRC, UN agencies) and funds for the Swedish Civil Contingencies Agency which can then be used upon Sida's written approval throughout the year.

for funding through Sida's Rapid Response Mechanism (RRM). Grants are typically agreed for a 12-month period but may cover a multi-year period in contexts with protracted needs and where the organisation has received Sida funding over consecutive years. Sida's SPOs can also apply for 'method and capacity-development support' for 'improving and strengthening the humanitarian system' or 'improving and strengthening the internal capacity of the organisation'. In addition, Sida agrees ad hoc partnerships with INGOs to support specific projects in particular geographic regions and/or thematic areas (Sida, 2020). Several SPOs also have Programme Based Approaches (PBAs) with Sida[10]. Under these, Sida provides flexible funding to support programming in agreed countries, based on the SPO's strategies for those countries – rather than funding specific projects or activities. The trust-based partnership nature of the agreement means that the PBA grantee doesn't have to define a detailed project and budget at proposal stage. That can also use their own project management and oversight systems to deliver their programmes and report outcomes, if aligned with a Humanitarian Response Plan or similar. Sida then regularly assesses the PBA partners' internal systems and procedures and can request documentation to be assured that funding is implemented in line with Sida's humanitarian intentions (AAH, NRC, IRC, 2022). SPOs from the UN family and the ICRC also receive flexible funding for their country programmes, rather than targeted project support.

Sweden's approach to localisation

Sweden does not have a dedicated strategy on localisation, nor does it currently channel any of its humanitarian funding directly to local and national actors (LNAs). As explored in the strategy section below, localisation is not an objective per se within Sweden's

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[10] At time of writing six INGOs had PBA agreements in place with Sida: Action against Hunger (AAH), Danish Refugee Council (DRC), International Rescue Committee (IRC),Oxfam, Norwegian Refugee Council (NRC) and Save the Children.

Humanitarian Strategy, nor is it defined there, but supporting local actors is mentioned as a means to meeting humanitarian needs: "In hard-to-reach areas, local actors often have better access than international actors. Activities will therefore contribute to deepening cooperation with relevant actors who have the capacity and ability to either operate in hard-to-reach areas and collaborate with local actors. Activities will promote innovative ways to reach these actors and strengthen their capacity." (MFA, 2020:4). But beyond this top-line steer, to date, Sweden's definition and approach and commitment to localisation agenda has largely been expressed through its support for the Grand Bargain.

1.2 Definitions

Localisation

Localisation remains a contested term with multiple different interpretations, and critiques of the concept among stakeholders (Robillard et al., 2021). As noted above, Sweden does not yet have its own definition of localisation[11]; rather, it uses the definition of localisation that was adopted by the Grand Bargain, as follows:

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[11] This is also a finding of the evaluation, which is described in more detail in the 'Strategy' section.

'Localisation is understood to mean 'making principled humanitarian action as local as possible and as international as necessary', while continuing to recognise the vital role of international actors, in particular in situations of armed conflict. In addition to the channelling of international humanitarian response funding to local responders, localisation includes investments (both financial and technical) in the long-term institutional capacities of local responders, as well as more equitable partnership arrangements and greater integration of local and international coordination mechanisms. Localisation is about recognising the already significant role of local responders and supporting local leadership and decision-making'.[12]

To translate this definition into a framework for evaluation, we examined the detail of the Grand Bargain commitments on localisation. However, as these are limited in their scope and specificity, we also referred to the series of established models and tools which have been created by other stakeholders and widely used to measure performance following the agreement of the Grand Bargain. These include the 'Localisation Performance Measurement Framework' developed by the Network for Empowered Aid Response (NEAR) (Featherstone, 2019); and the 'Seven Dimensions of Localisation Framework' that emerged from the Disasters & Emergencies Preparedness Programme (Van Brabant & Patel, 2018); as well as specific Grand Bargain commitments on localisation.

Drawing on these sources and the key performance indicators they contain, the theoretical framework for this evaluation centres around six areas of inquiry which are held to be the key dimensions of

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[12] The definition of localisation is based on text posted on the Grand Bargain Localisation Workstream website. See: https://gblocalisation.ifrc.org

localisation: 1) strategy; 2) funding; 3) partnerships; 4) capacity; 5) leadership & participation; and 6) knowledge (see Figure 3 and Annex 4 for a more detailed version of the framework).

Figure 3: Theoretical Framework for the Evaluation
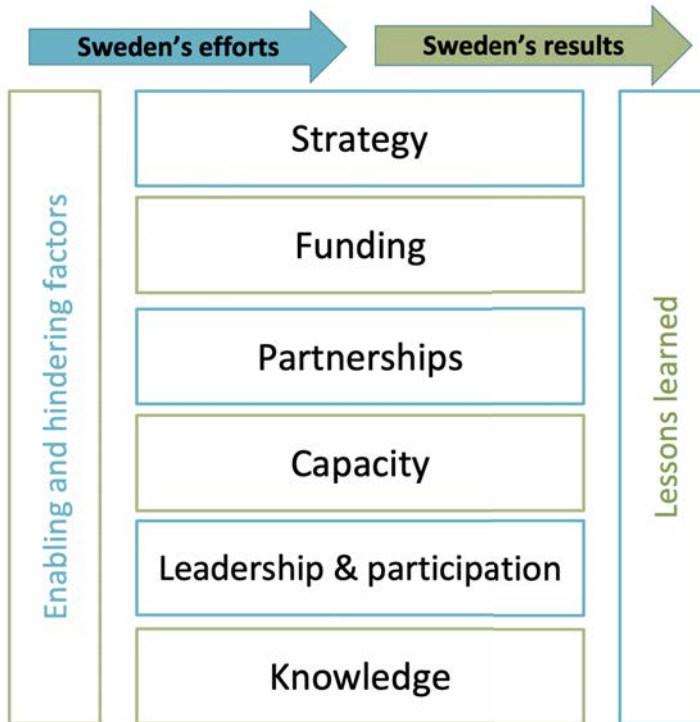
There are strong links and dependencies between the different thematic areas of the framework. From the perspective of Sweden as an important bilateral donor, the dimension of 'funding for localisation' is clearly important. This is also the most clearly defined area of localisation commitment in the Grand Bargain. However, funding is also a crucial enabler of other important dimensions of localisation – such as 'partnerships', 'capacity development', 'leadership' and 'knowledge generation' – even if these arguably more critical to meaningfully shifting power than the simple transfer of financial resources. The dimension of 'strategy' was also added as

a foundational dimension of localisation performance, since without clarity on what Sweden intends to contribute to the localisation agenda, it is difficult to Sweden to advance or promote action, and indeed to assess progress, in any of the other thematic areas.

Local and national actors (LNAs)

Defining local humanitarian actors is similarly complex, and distinguishing who is 'local' is a relative and highly context-specific exercise (Barbelet, et al., 2021). The umbrella term local and national actors (LNAs) covers highly diverse authorities, institutions, formalised organisations, non-formalised networks and entities with varying degrees of proximity to crisis-affected people (Robillard et al., 2019).

According to the Grand Bargain Localisation Workstream, local actors are defined as 'national and local responders comprising governments, communities, Red Cross and Red Crescent National Societies and local civil society'.[13] We use the term LNAs whenever referring to these actors as a category – however, we note below that we do not include either government or informal 'grassroots' organisations within this definition (see 'Purpose and scope of the evaluation').

Sweden/Swedish Officials

We refer to Sweden or 'Swedish humanitarian aid' when referring to both MFA and Sida together. Similarly, 'Swedish officials' refer to appointed officials or employees of the Swedish government, including Ministry of Foreign Affairs (MFA) and Sweden International Development Cooperation Agency (Sida) based at headquarters (Stockholm) and Embassy/consulate in the cooperation countries supporting the direction of Sweden's humanitarian aid.

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[13] See: https://gblocalisation.ifrc.org

Strategic Partner Organisations (SPO)

The term Strategic Partner Organisation (SPO) is used by Sida to refer to the organisations it partners with. In this report we use it to refer to any partner organisation of MFA and/or Sida humanitarian support and use the term interchangeably with 'intermediary organisations'.

Risk

Risk is a frequently cited issue in localisation discussions, usually as a barrier to progress. A frequent critique of the conception of risk in internationally led localisation discussions is that it focuses on the 'risk of' LNAs, rather than the 'risks to' them (Stoddard et al., 2019; Humentum, 2023). This evaluation considers the wide 'register' of risks associated with humanitarian action for all stakeholders involved: safety, security, fiduciary, legal/compliance, operational, reputation, information, and ethical risks (Stoddard et al., 2019). Our findings have a particular focus on fiduciary and security risks, as these emerged most strongly in our research as concerns associated with localisation in general.

1.3 Purpose and scope of the evaluation

This evaluation seeks to improve the evidence base on Sweden's application of the localisation agenda, under the commitments in the Grand Bargain. It provides analysis of Sweden's performance against these commitments, specifically:

a) Sweden's action on localisation to date:

- Review of Sweden's efforts to support implementation of the localisation agenda within its humanitarian work.

- Analysis of efforts and gaps to reveal what these demonstrate about Sweden's motivations, interpretation, and priorities in applying the localisation agenda.

b) Impacts of these actions to advance localisation:

- Evaluation of the results of Sweden's efforts and interventions on advancing the localisation agenda.

- Analysis of the factors that have enabled or hindered Sweden's investment in efforts and achievement of positive outcomes.

c) Potential for improved efforts and outcomes to advance localisation:

- Articulation of the challenges and opportunities for Sweden's humanitarian work to further the localisation agenda.

- Recommendation of future areas of where Sweden can contribute to progress on localisation.

While the primary aim of the evaluation was to inform the future of Sweden's humanitarian support, the report also contributes to strengthening the evidence base available to other Grand Bargain signatories and wider localisation stakeholders. The challenges faced by Sweden in applying its localisation commitments are far from unique and are likely to resonate with those encountered by other bilateral donors and humanitarian organisations.

Beyond the scope of this evaluation

This report does not seek to assess the merits or demerits of localisation. The localisation debate has many vocal champions, detractors, and sceptics who are engaged in live debates on the meaning and value of the agenda. These include views about whether localisation is good per se, or a means to an end; to what degree it promotes cost effectiveness; how it relates to the core principles of humanity, impartiality and neutrality; and how its fits with multi-lateral coherence. The starting point of this evaluation is that Sida has committed to advancing localisation, and therefore how it is doing this – not whether or not it should.

As noted in the definitions section, above, this report does not cover two groups which are often included under the umbrella category of LNAs:

1. While national and sub-national state actors are clearly important stakeholders, and are recognised as such within Grand Bargain definitions, they are considered largely outside the scope of this evaluation. This is because Sweden does not channel humanitarian assistance to these actors and its partners focus on local and national non-governmental organisations, or Red Cross/Red Crescent National Societies, at least in terms of the provision of funding and the agreement of formal partnerships. While there is also clearly important ongoing dialogue and cooperation between Sweden (and its partners) and local and national governments, this was not evident from the data collected for this evaluation.

2. Similarly, grassroots organisations and community-based groups are not covered in any great depth. Again, this does not reflect their importance as humanitarian agents; on the contrary, they are widely recognised as vital first responders in emergency contexts and provide a critical link to (and are often one and the same as) people affected by crises. That said, Sweden does not yet have experience of partnering directly with grassroots organisations, and its SPOs did not offer significant evidence of partnering with 'hyper-local' or community-based groups.

3. Linked to this, the evaluation also considers the areas of Accountability to Affected Populations (AAP) and the participation of affected communities as outside of its scope. While some other localisation frameworks include community participation as an integral part of localisation[14], the connections between the two areas are not automatic or clear.

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[14] NEAR's 'Localisation Performance Measurement Framework', for example, includes the dimension of 'participation', with the aim of promoting more involvement of affected people in what relief is provided to them and how (Featherstone, 2019).

Methodology

The evaluation used a mixed-method approach of qualitative and quantitative modalities. An overview of the methods used, and the evidence generated are outlined in Table 1 and a detailed methodology is set out in Annex 4.

Table 1: Summary of methods and evidence sources

Type of evidence	Description
Document review	The evaluation team gathered and analysed literature on topics related to localisation at both global and country levels. Over 100 documents were considered as relevant background literature and 55 were referenced within this report.[15]
Quantitative data	Sida provided data on amounts of humanitarian assistance provided to its SPOs in 2021 and 2022, along with preliminary data for 2023. Data on MFA's core funding to humanitarian organisations was included within this dataset. In addition, the evaluation team sourced financial data from UN OCHA's Financial Tracking Service (FTS) and the Country-based Pooled Fund (CBPF) Data Hub.
Online survey	An online survey was used to gather perspectives on Sweden's application of the Grand Bargain localisation agenda. Respondents included: 1) Sida and MFA staff in Stockholm and in Swedish missions abroad; 2) direct recipients of Swedish funding at HQ and country levels; and 3) indirect recipients of Swedish funding, mainly national and local NGOs at country level. The survey was available in English, French, Ukrainian and Burmese. A total of 146 people responded of which 69 percent identified as working at national/sub-national level; 19 percent at global level; and 12 percent at regional level.

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[15] This does not include funding proposals and project reporting from Sida's SPOs, which are in addition.

Type of evidence	Description
Interviews	At the global level, key informant interviews (KIIs) were organised with Sida & MFA officials; Sweden's INGO & UN partners; and other donors & experts on localisation. At country level, for the deep-dive case-studies, KIIs were conducted with the same stakeholder groups, as well as with local and national NGOs indirectly receiving Swedish humanitarian funding.
	In total, 169 individuals were interviewed: 37 percent worked at global level and 63 percent worked at country-level across eleven countries. As Sweden's localisation efforts are largely indirect (i.e. via international partners) 65 percent of those interviewed worked with international organisations, 21 percent worked with national or local NGOs or NGO consortia, and 14 percent were Swedish officials.

Country case-studies – sampling and selection

The evaluation used a two-tier country case-study approach: deep-dive and light-touch. Country selection was guided by analysis of the size of Sweden's humanitarian allocation to the country and of the crisis context type – to find a sample that accounted for considerable part of Sweden's humanitarian spend across diverse situations – geographically and in terms of operating environment (e.g., civil society space, humanitarian access). The number of Sweden's direct partners and the presence of CBPFs were also considered.

The deep dive country-case studies were conducted by consultants originating from and working in three countries: The Democratic Republic of Congo (DRC), Myanmar and Ukraine.

These researchers reviewed relevant literature and conducted targeted interviews with Swedish officials, SPOs receiving direct Swedish humanitarian assistance, and LNAs receiving indirect Swedish humanitarian funding.

The light touch case-studies were conducted remotely by international researchers in eight countries: Afghanistan, Bangladesh, Ethiopia, South Sudan, Palestine, Syria, Yemen and Somalia. A more modest set of key informant interviews were conducted for each country (notably, not including interviews with individual LNAs receiving indirect Swedish humanitarian assistance).

Limitations and assumptions

There were several limitations and assumptions implicit in the subject and scope of the evaluation, as summarised below (see Annex 4 for a fuller list).

Table 2: Summary of limitations and assumptions

Limitation/ assumption	Description
Community engagement	The methodology for this evaluation did not include engagement at the community level. While community members are important stakeholders, and their views on localisation are critical, it was neither possible (given time, capacity and financial constraints), nor ethical (given the demand that it would place on their time), to consult directly with communities.
Measuring outcome and impact	The focus of interviews was on the activities and effort of Sweden and its partners to advance on localisation. The evaluation team relied heavily on the perceptions of different stakeholders to draw conclusions on the outcome and impact of those efforts. However, a lack of concrete evidence on outcomes, in the form of monitoring data or pre-existing research, remains a limitation of the research.

Limitation/ assumption	Description
Attribution to Sweden	Given that much of Sweden's contribution to localisation is delivered via its international strategic partners, it was challenging to isolate Sweden's role in making progress on localisation. Sweden's influence was more obvious in some thematic areas – such as within 'funding' – than in others. The literature on Sweden's contribution to localisation is limited. And, while the evaluation team focused its investigations on Sweden's specific approach and contribution to localisation, attribution remained limited, and perception based.
Positive bias	With any evaluation of a bilateral donor, there is a risk of positive bias, given the uneven power dynamic between donor and those in receipt of their funds, or seeking to win them. This was noticeable in some interviews with Sweden's SPOs but was particularly evident in the survey conducted as part of this evaluation, most notably among the responses from LNAs. While not entirely discounting the positive views of Sweden's direct and indirect partners, the evaluation does treat the data with caution and seeks to balance any positive bias with more critical perspectives that were also expressed during the evaluation.
Generalisation of findings	Although localisation is highly context-specific, and this evaluation draws general conclusions and makes overarching recommendations that can be applied globally. The evaluation team attempted to balance this with context-specificity by illustrating the general findings with evidence from different country case-studies, highlighting important differences, and singling out outliers and exceptions.

Limitation/ assumption	Description
Quality and transparency of data	Transparent data on indirect Swedish humanitarian assistance to LNAs is not readily available. Secondary data (e.g., from UN OCHA's FTS) is incomplete and the evaluation team's attempts to gather additional primary data from Sweden's international strategic partners generated an inconsistent and incomplete dataset. The estimate of how much of Sweden's humanitarian funding reaches LNAs is based on Sweden's own calculations and should be investigated further, beyond this evaluation.
Timing of the evaluation in relation to real-time changes in Sweden's approach	The evaluation was conducted concurrently with efforts by Sida to make progress on localisation. In particular, Sida's Localisation Task Team was active at the time of the evaluation and a Sida policy brief on locally led humanitarian action was in the process of being drafted and finalised. Every effort was made to stay informed and to reflect those emerging and forthcoming initiatives within this report. However, there may have been further changes in the time between the completion of this research and publication of this report.

Structure of the report

Within this report, research findings are grouped under the six main dimensions of localisation set out in the theoretical framework: strategy, funding, partnerships, capacity, leadership, and knowledge. Each of these six findings sections summarises and analyses the evidence at global and country levels, with sub-headers reflecting the sub-questions in the evaluation matrix (see Annex as well as emerging themes (see Annex 4). Given the inter-dependencies of the six dimensions of localisation, there is inevitable cross-over between findings. Where this is the case, evidence is presented in the most relevant section – for example, findings on Sweden's funding for the leadership and participation of LNAs are covered in the 'Leadership and Participation' section only, and not repeated in the 'Funding' section.

Country examples are highlighted in boxes, with a particular focus on the three in-depth country case-studies – Ukraine, DRC and Myanmar. Summaries of the main findings from each of these are presented in Annex 5.

The conclusions which emerge cut across the six dimensions. The report therefore draws these out under a new consolidated set of thematic headers, which frame the forward-looking lessons for Sweden. These consolidated lessons fall under seven areas – four areas for normative shifts, and three areas for practical consideration. These conclusions are followed by a set of recommendations which are directed towards Sweden in particular, but which are also relevant to Sweden's direct and indirect partners, and to other stakeholders – other government donors in particular. The recommendations are also repeated in a separate table (Annex 1) where they are prioritised and cross-referenced to the different thematic areas to which they relate.

2   Localisation dimension one: strategy

Section overview and summary

Articulating and communicating a clear strategic approach to localisation is fundamental to progress. A clear localisation strategy both sets the foundations for internal institutional change, and provides the basis to promote external change, including via partners. It also provides a benchmark against which improvements can be incentivised and monitored.

This section therefore examines four aspects of strategy: the extent to which localisation is a strategic priority for Sweden; the clarity, coherence and comprehensiveness of its localisation approach; how well communicated and understood this approach is; and the extent to which Sweden has supported others to develop strategic localisation approaches. Our research reveals the following five key findings:

- Localisation is widely felt to be a priority for Sweden, and its commitment to the Grand Bargain signals this. However, localisation is not an objective per se in Sweden's humanitarian strategy and is mentioned only in terms of an enabler to accessing hard-to-reach populations.

- Sweden's hitherto lack of specific localisation policy left stakeholders unclear and unconvinced on how top-line Grand Bargain commitments translate into operational priorities.

- In the absence of such specifics, there is inconsistent prioritisation, messaging and effort between country teams, and between Sida's Unit for Humanitarian Assistance and the MFA, leaving Swedish officials the least convinced of all stakeholder groups that their institution prioritised localisation.

- The lack of a clear, coherent steer also contributed to risk-aversion on the part of Sweden's partners, which compromised progress on resource-sharing with LNAs.

- Despite the high value placed on Sweden's flexibility and latitude as a donor, many partners are calling for it to be more specific and assertive on its strategic approach and expectations on localisation.

- Sida's current efforts to formulate a briefing note and guidance are therefore welcome, but lessons from other donors suggest that this will need to be accompanied by concerted efforts to promote and apply the policy across all relevant parts of Sida, the MFA and country teams.

2.1 Is localisation a priority for Sweden?

Signing up to the Grand Bargain was for Sweden, as for all signatories, a public signal that localisation was being taken seriously as an institutional priority. Its current four-year humanitarian strategy (2012–2025), which sets the overarching objectives for Sida's humanitarian aid, reflects this, stating that activities will contribute to deepening cooperation and collaboration with local actors (MFA, 2020).

Seven years on from the Grand Bargain agreement, there is a widespread sense that Sweden has indeed prioritised localisation – our survey found that 58 percent of respondents from international organisations (UN and INGO) believed that Sweden strongly prioritises, or prioritises, its commitments to localise humanitarian assistance. The view from local and national actors (LNAs) was even more positive – two thirds (66 percent) of respondents perceiving it to be a priority. This is somewhat surprising and may be reflective of the sample who chose to answer, and positive bias, given that our country case studies revealed a low level of recognition of Swedish aid among the wider body of LNAs.

However, this broadly positive view was tempered by the fact that it was not shared by all. Indeed, over a quarter (29 percent) of international agencies felt that Sweden only moderately or slightly prioritised localisation.[16] Local, national, and international actors also made the distinction between prioritisation in words and in deeds. As one international respondent qualified their view of the degree to which localisation was a priority for Sweden: "in words, yes. In action, no" – a view which was echoed by LNAs in DRC who expressed frustration that "we have talked a lot about localisation and yet we have not seen it in facts."

Most striking however, was that Swedish officials appeared to be least convinced that localisation was a priority for their institutions – little more than a third (34 percent) of these respondents answered positively. While this may be taken as a healthy degree of self-criticism from those charged with the practicalities of delivery, it is also indicative of the internal barriers encountered by Sweden's civil servants and explored throughout this evaluation.

Prioritising the 'best placed actor'

The over-riding objective of Sweden's humanitarian aid is to save lives, alleviate suffering and uphold the dignity of crisis-affected people (MFA, 2020). Its priority in selecting partners, is therefore to support what Swedish officials refer to as the 'the best placed actor' to reach people most effectively, especially where needs are most urgent and humanitarian presence is lowest. Sweden's Humanitarian Strategy frames the logic of localisation in terms of improving access in hard-to-reach areas, rather than as a priority per se (MFA, 2020) and this understanding is clearly shared by officials in Stockholm and country offices. While this sometimes aligns with the localisation agenda, as LNAs are understood to frequently have the comparative advantage of access and context-specific expertise, this is not

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[16] Survey respondents were given the choice between 'strongly prioritises', 'prioritises', moderately prioritises', 'slightly prioritises' 'does not prioritise'.

guaranteed. While one partner in Somalia noted that a focus on the best placed actor "doesn't bring any tensions with localisation", the view from an official in Stockholm, was that "Sida are very aware that 'local first' isn't always the best modality for lifesaving in difficult settings".

Sida therefore faces the challenge of reconciling these priorities of advancing localisation and supporting the best placed actor. As we explore below (see sections 4, partnerships, and 5, leadership), at a practical level this could involve investments to support LNAs to be more widely recognised and enabled to be 'best placed', both through more thorough and open identification of potential partners and through more targeted capacity strengthening. But practical measures could also be accompanied by a normative shift, to clearly place localisation as a priority per se, albeit a secondary one. There is precedent for this in the CBPFs: these have life-saving assistance as their top priority, followed by localisation as a second priority (OCHA, 2022). In practice this means that some CBPF funding is intentionally directed to LNAs who may not yet be judged best-placed to provide life-saving assistance, but who require funding in order to survive and grow. The Afghanistan Humanitarian Fund is a good example of this, with a dedicated funding window to channel funds to LNAs to support them after the Taliban takeover.

2.2 Is Sweden's approach clear, coherent, and comprehensive?

Until 2023, Sweden did not have any written policy or guidance detailing its position on localisation, beyond the relatively brief reference in its Humanitarian Strategy, and the commitments set out in the Grand Bargain. However, our evaluation has coincided with a period of concerted activity to translate these high-level commitments into a practical approach. Led by the Unit for Humanitarian Assistance's recently formed Localisation Task Team, this includes development of a policy brief, technical notes and an

action plan, followed by a review of existing partnership guidance to ensure it reflects and supports localisation priorities. It is likely that these will feed into a stronger articulation of Sweden's localisation approach in its next four-year Humanitarian Strategy which will run from 2025.

Sida's present efforts to set out its approach have been long-awaited by many. Swedish officials and SPOs alike, expressed the need for clearer guidance – in the absence of which they had been following their own experience and assumptions of localisation requirements – and also felt the lack of an institutional steer to push them to explore options. Some noted that Sweden was lagging behind other donors in following up on its Grand Bargain commitments with a clear policies and plans. As USAID and ECHO had recently articulated their strategies, there was mounting pressure on Sweden to develop its position. Arriving at an approach at this late stage, rather than being an earlier agenda-setter, means that Sweden has the benefit of learning from and building on others' approaches, but the challenge of retrofitting to align with its partners' diverse interpretations of localisation.

Yet Sweden was not alone in being late to develop its approach. Seven years after signing the Grand Bargain, many other large donors had yet to articulate their strategies, and several major agencies were only at time of writing, finalising or rolling out their localisation policies or strategies: this included two of Sida's largest UN humanitarian partners who were on the brink of publishing their approaches. For some, this delay was put down to extensive consultation and deliberation as they navigated contested visions of localisation and negotiated institutional scope for change. Others suggested that it was the result of an inevitable time-lag between signing up to global commitments and seeing the insufficient progress in implementation. According to Swedish officials, it was the latter combined with external demand and internal changes in leadership which catalysed Sweden's present efforts.

Institutional coherence

Beyond the Humanitarian Strategy and Unit, other Sida strategies and guidance do aim to support localisation, without necessarily using the same terminology. For example, Sida's guiding principles for its support to civil society covers civil society organisations as development or humanitarian actors (Sida, 2019); and the Sida strategy on research for poverty reduction and sustainable development puts a strong emphasis on supporting local ownership of research agendas (Sida, 2022a).

Yet while the Sida Unit for Humanitarian Assistance was making concerted efforts to develop its approach, there were concerns that it had missed opportunities to learn from and connect to these other dimensions of Swedish aid – and to forge a 'Team Sweden' approach to localisation that could mobilise the collective weight of Swedish engagement, experience and influence. Notably, the Localisation Task Team only comprised staff from the Unit for Humanitarian Assistance, and none from the Units working on development support. Links with the Ministry of Foreign Affairs (MFA), which administers core humanitarian aid to multilateral organisations, and represents Sweden on these organisations' boards, were also weak.

There is a clear case for connecting localisation to work to advance the humanitarian-development-peace nexus.[17] LNAs tend to bridge these internationally created aid categories, and sustained support to them requires joined-up action from donors (see Barbelet et al., 2021). In Palestine[18], Swedish officials saw their efforts to advance both

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[17] The humanitarian-development-peace nexus refers to the interlinkages between these three approaches and efforts to improve coordination, coherence and complementarity between them in order to reduce needs, risks and vulnerabilities and prevent crises. Sida's approach to this 'triple nexus' is set out in a 2020 guidance note: https://cdn.sida.se/publications/files/sida62325en-humanitarian-development--peace-nexus.pdf

[18] Interviews and research for this evaluation were conducted prior to escalation of conflict in Israel/Palestine in October 2023, and the temporary suspension of Swedish development aid to Palestine.

localisation and nexus approaches as 'hand-in-hand' to address the protracted crisis and as "part of a wider push to modernise humanitarian response and think together about the best way to invest in addressing the needs of the population." Yet prior internal reviews by Sida have shown how localisation has largely been a blind spot in its nexus approach. Formal involvement of Sida's nexus advisers in the Unit for Humanitarian Assistance's localisation task team could have helped to advance both agendas. But calls for inter-departmental cooperation must be set against the backdrop of change in Sweden's approach to international development. As Sweden was at the cusp of entering its next development strategy[19] there was considerable uncertainty about what space would remain under future budgets and priorities to advance joined-up humanitarian and development approaches to localisation in crisis-affected contexts.

Multiple sources also observed that the Unit for Humanitarian Assistance risked 'reinventing the wheel' if it did not learn from the established work in the Civil Society Unit (CIVSAM). As part of Sweden's development cooperation, CIVSAM has developed policies, guidance and proven partnerships to support national and local civil society – and indeed several SPOs received support from both the Unit for Humanitarian Assistance and CIVSAM but, as explored in section 5 – there was a lack of communication and joined-up thinking between the Units. Again, Sweden is far from exceptional in failing to make these internal connections between the two agendas of civil society strengthening and localisation – indicative of this, almost all the donor signatories to the Grand Bargain are also adherents to the 2021 OECD DAC recommendation on Enabling Civil Society in Development Cooperation and Humanitarian Assistance (OECD, 2021), but this is rarely referenced in the humanitarian localisation debate.

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[19] At time of writing (October 2023) the new Development Strategy was awaiting publication, and there were Sida staff and partners alike expressed that it might mean significant budget cuts for development support in a number of countries facing humanitarian crises.

2.3 How well is Sweden's approach communicated and understood?

Given the lack of an official localisation approach, it was unsurprising that SPOs overwhelmingly reported that Sweden had not clearly communicated its localisation expectations to them. In the absence of other guidance, many assumed its stance was simply what was stated in the Grand Bargain commitments. As one INGO representative noted, "apart from knowing that Sweden is a Grand Bargain signatory and thinks localisation is a good thing, there's nothing more specific on this from them. We're not aware of any specific priorities and calls for greater levels of localisation have been vague." The assumption that Sweden's approach was limited to the Grand Bargain commitments, led several sources to voice concern that Sweden was overly fixated on the 25 percent funding target – a common critique of the Grand Bargain. For example, sources in Afghanistan (ACAPS 2023) echoed wider concerns that pursuing percentages come at the expense of a more nuanced and comprehensive approach, becoming a 'box-ticking exercise' or "localisation for localisation's sake".

In the absence of clearly communicated guidance, staff and partners reported that messages about localisation were inconsistent. As one SPO noted, "they have a lack of clear policy and guidance that would help us to make more progress on localisation. Their support is there but it's ad-hoc and reliant on individuals." In Palestine, partners noted how the clarity, engagement and commitment of Swedish Embassy staff had significantly advanced action on localisation; but interviewees at headquarters, as well as in DRC, Bangladesh, South Sudan and Yemen suggested that the lack of a common position from Sida – with different messages from officials in-country and in the Stockholm Unit for Humanitarian Assistance – was creating confusion, and a lack of direction and accountability.

Uncertainty often bred caution on the part of SPOs – and so Sweden's lack of clarity may have undermined its good intentions on localisation. As detailed in section 3 (funding) below, this was particularly the case around financial risk, with international agencies unclear on how much latitude there was in financial reporting – for example where LNAs were not able to provide procurement documentation or receipts or needed to cover unforeseen or exceptional costs. Some SPOs noted that their focal points in country and in the Unit for Humanitarian Assistance had verbally indicated that such irregularities could be accommodated – but without clear guidance from Sida's Controllers[20] these partners still feared that they would be liable, and were therefore reluctant to expose themselves to such potential risks. Noting the lack of alignment between Sida's programmatic aspirations and its compliance imperatives, one survey respondent added, "It is very clear when you talk to the Sida Programme Manager that Sida is committed to the GB Localisation agenda in a very meaningful way. What is challenging is the compliance regime, that makes it harder to walk the talk."

Publishing clear and detailed technical guidance will help Sida to address uncertainty and apparent internal misalignment, but lessons from ECHO suggest that additional effort is required. Experts involved with the development and roll out of ECHO's recent Localisation Guidance Note (ECHO, 2023) noted the work required to build the internal political, practical and cultural readiness for implementation of localisation guidance – observing that change within any large bureaucracy takes time.

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[20] This is the term used by Sweden for the staff and teams which have an audit and compliance function.

2.4 Has Sweden encouraged others' localisation approaches?

Sida's processes for partner engagement offer multiple opportunities for it to promote localisation (see box 2 below). The SPO agreement process includes in-depth assessment at both the initial application stage, and on an annual basis to approve programming. Annual reporting is accompanied with a scheduled partner dialogue – a widely appreciated opportunity for both Sida and the partner to discuss and address emerging learning and concerns.

Sida's exacting questions about localisation at the partnership agreement stage can be instrumental in advancing INGO's localisation approaches. One SPO noted that the two-year approval process had been onerous, but that "in hindsight the level of scrutiny and dialogue was helpful. It really shows that Sida is trying to find partners that it trusts to deliver on localisation." Another SPO noted that Sida's scrutiny during the review of the pilot phase of its Programme-Based Approach (PBA) provided the incentive for internal change: "Sida were good at questioning the disconnect between our rhetoric and our use of funding – and that's been useful internally for advancing localisation within our organisation."

At country level and at Headquarters, Sida officials and partners both observed that localisation was more prominently on the agenda in their annual dialogue meetings, both raising the issue more routinely and pursuing it in more depth. However, several SPOs felt that their own organisational approaches to localisation were more advanced than Sweden's – so rather than Sida influencing them, the dialogues were more an opportunity for Sida to learn from its partners' tools and practice.

And while most felt that localisation was firmly on the dialogue agenda, this was not always the case. One major UN partner representative observed that localisation was neither in its dialogue plan with Sweden, nor raised by Sweden on its advisory board –

perhaps indicative of a lesser engagement on localisation by the Sweden's MFA which manages core funding to UN agencies and participates in their boards and advisory groups.

Sweden is widely prized as a flexible donor. Its commitment to multi-year and unearmarked funding have been a priority in its engagement with the Grand Bargain process. Although its partner agreement processes are rigorous, SPOs are given considerable latitude to direct funding to best meet humanitarian needs – this is particularly the case for the INGOs which have PBAs, and for the Pooled Funds and the core-funded UN agencies. And although Sida is becoming more exacting in asking questions of its partners about localisation, it is neither prescriptive nor punitive about implementation.

There is therefore a call for Sweden to be more assertive about its localisation expectations and to strike a better balance between flexibility and clear guidance. Several SPOs, speaking from headquarters and from country level, urged Sida to be bolder as this would provide an important incentive and enabler for change – noting that such an 'external push' was necessary to overcome agencies' internal resistance to shifting power and resources. One SPO posed this challenge directly to Sida: "We have urged Sida to be bold and mandate their partners to act. They were uncomfortable about imposing top-down conditions – but I see it as overdue corrective. Donors hold a lot of power in the system, we would like to see them use it more overtly." Another INGO representative in Yemen suggested that Sweden has considerable space to pose more detailed questions about localisation without compromising its commitment to flexibility, and that partners would tolerate and perhaps welcome this.

This was not a unanimous position between – or notably within – SPOs: separate interviews with institutional localisation leads revealed a divergence from donor relations leads, with the former arguing for stronger donor steer and the latter arguing that preserving flexibility gave international agencies the security and the

space to pursue localisation. As we explore in our conclusions (see section 8), Sweden can find a means of setting clearer demands without becoming rigid or overly bureaucratic.

Influence beyond partners

This call to be more vocal extends beyond engagement with partners, to Sweden's role on the external stage. Multiple SPOs and one donor observed that Sweden had remained relatively quiet on the topic of localisation on external platforms, from Grand Bargain fora to high-level discussions about the humanitarian system. This includes the recent European Humanitarian Forum co-chaired by Sweden and the European Commission, at which localisation was a key discussion topic.

This reticence was described as both surprising and disappointing, given Sweden's strong track record on other aspects of good donorship, such as reducing earmarking and cash coordination – and indeed its founding role in establishing the Good Humanitarian Donorship initiative. Comparisons were made to other donors, including US, ECHO and Denmark who were seen to be far more visible and concerted in using their platforms to call for change. Although it was suggested that this might be part of an informal strategic division of labour between donors – choosing to champion different areas for change – it was felt by some to both diminish Sweden's standing and the momentum for change. As a fellow donor expressed it: "Sweden doesn't come across as a strong advocate for localisation. Others are much more present. It's a shame because they're an important and well-respected donor. They should be more vocal and visible."

Yet there were instances at the country level where Sweden was felt to be taking leadership and leveraging its position in external fora. As noted above, this was largely attributed to the commitment and experience of in-country teams. In Palestine for example, Sweden was praised for being a proactive champion on localisation, being

instrumental and vocal in the multi-stakeholder localisation task team and engaging extensively in the development of Sida's pilot to directly fund LNAs (see section 2). In Ethiopia, stakeholders reported that Sweden was using its position on the Advisory Board of the Country Based Pooled Fund (CBPF) to support localisation. This variation between countries both demonstrates the potential capacity for Sweden to better use its platforms, and for the need for clear direction from leadership to shift from reliance on individuals, to a consistent voice.

3 Localisation dimension two: Funding

Section overview and summary

Funding for LNAs is central to the Grand Bargain commitments on localisation, including its target for signatories to provide at least 25 percent of their funding to local and national responders as directly as possible (Grand Bargain, 2016). Indeed, one of the main ways in which donors can potentially support LNAs is through financing – either directly, by transferring resources to them; or indirectly, by using its funding as leverage to encourage and incentivise its international grantees to work more equitably with local partners.

This section examines the evidence on three aspects of Sweden's progress against commitments to better fund LNAs: the extent to which Sweden has prioritised funding for LNAs; the quantity of its direct and indirect funding to local actors including the extent to which financial risk management enables or hinders this; and the quality of that funding – in relation to overheads, timeliness and predictability. It finds that:

- None of Sweden's humanitarian funding is currently channelled directly to LNAs, though a significant amount is estimated to reach LNAs indirectly through pooled funds, international NGOs and UN organisations. Sweden's own estimate is that around 17 percent of Sida's humanitarian allocation reached local partners in 2022.

- Barriers to providing more direct funding to LNAs include Sweden's capacity to manage the administrative burden and, more importantly, its low risk tolerance, which is perceived as being out of step with Swedish ambitions on localisation.

- Given the flexibility of Sweden's humanitarian funding, indirect funding to LNAs is largely left to the discretion of Sweden's strategic partners and prioritisation of localisation within the internal management of partnerships varies considerably. As a result, it is difficult to get a clear picture of how much is passed on to local partners due to inconsistent reporting practices, and reporting from UN partners is particularly opaque on this point.

- Quality of funding for LNAs is perceived as equally, if not more, important than quantity. Critical aspects include passing on of overheads to LNAs, where Sweden could more consistently incentivise good practice; and passing on of longer-term funding to LNAs, where Sweden could more strongly encourage its partners to pass on the benefits of multi-year support.

- Looking ahead, piloting of direct funding to LNAs is expected to generate learning for Sida, including on balancing its commitments on localisation with financial risk management.

3.1 Prioritisation: does Sweden prioritise improving and increasing funding to LNAs?

Even though Sweden does not currently provide any of its humanitarian assistance directly to LNAs, there is a general perception that it prioritises its localisation funding commitments. Of those who participated in the online survey for this evaluation, the majority felt that increasing the quantity and quality of funding to LNAs was a priority for Sweden: nearly two thirds of survey respondents said that increasing the quantity and quality of

humanitarian funding was a 'very important' or 'important' priority for Sweden.[21]

As noted above, the localisation agenda has been criticised for being overly focused on funding. In part, this can be attributed to the Grand Bargain's 25 percent target of funding to local actors 'as directly as possible' being one of the most measurable indicators of progress, compared with other, more qualitative, aspects of localisation which are felt to be equally, if not more, important than quantity (Howe, et al., 2019; Barbelet, et al., 2021; Featherstone & Mowjee, 2020; Abdulkadir, 2017).

This critique was echoed by Sweden's SPOs. One international partner said, "they want to see us increasing the amount we spend through local actors, period". Another partner said that "we support partners in other ways beyond transfer of grants and proactively report this wider engagement to Sida, even though we are not clear that they want to see this given their focus on asking for data on transfer of funds". There was, however, a general acknowledgement that funding remains an important enabler of localisation and, conversely, lack of resources is one of the biggest barriers to shifting power to local actors.

3.2 Funding quantity: does it reflect Sweden's commitments?

There are several barriers that challenge Sweden's ability to provide direct funding to LNAs. Over half (52 percent) of our survey respondents said that 'bureaucratic and legal constraints on funding LNAs directly' were a barrier to localisation for Sweden, making it

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[21] LNGOs were most positive about Sweden's prioritisation of funding for LNAs, followed by NNGOs, INGOs, the Swedish Government, then UN agencies. This is somewhat curious as some of the same local and national NGOs were also not aware that they were indirectly receiving Swedish humanitarian funding prior to this evaluation.

the most significant barrier; and 43 percent selected 'the administrative burden of overseeing multiple, smaller grants'. Global literature on financing for local actors similarly highlights the administrative aspects that undermine the feasibility of large-scale, direct funding from bilateral donors to LNAs (see for example, Cabot Venton et al., 2022). So while the evaluation could find no legal barriers to prevent Sweden from providing direct humanitarian funding to LNAs, there was strong evidence from interviewees, particularly those working in countries receiving Swedish humanitarian assistance, that the bureaucratic constraints were significant.

Box 1: Country perspectives on Sweden's ability to finance LNAs directly

At country level, interviewees and online survey respondents voiced concerns about Sweden's ability to directly finance LNAs. Relationships with Sida's strategic partners are led by organisational focal points in Stockholm who tend to communicate with donor liaison focal points within the headquarters of their partner organisations. This was cited as a barrier in the *Democratic Republic of Congo (DRC)*, and in *Ethiopia*, where Sweden's "top-down managerial style" was described as ill-suited to working closely with LNAs and providing direct funding.

Elsewhere, the lack of Swedish humanitarian staff in-country was highlighted as a constraint, as mentioned in the case of *Ukraine*, where interviewees raised concerns about Sweden's ability to support the capacity development of local partners in-country to allow them to benefit from direct Swedish funding. Even Swedish government staff in Ukraine noted "that human resources is one of the main challenges" in handling multiple grants to partner organisations. Similar concerns were raised in *South Sudan*, where in-country understaffing was thought to compromise Sida's ability to do "proper follow-up with LNAs".

> In *Myanmar*, interviewees from local NGOs questioned their own "organisational capacity to be eligible for big amounts of money directly from government donors", noting that they were already challenged by the high partnership eligibility and grant management standards of intermediary organisations.

Noting these barriers, Sida embarked on a localisation piloting process in 2023 to test the provision of direct financing to LNAs. At the time of writing, no direct funding had yet been disbursed, but different models and options were beginning to emerge from the mapping and consultation exercises that had been led by a combination of Unit for Humanitarian Assistance and Embassy or consulate staff. In Myanmar, this included discussions with another bilateral government donor on the possibility of co-financing a local NGO and agreeing on a joined-up approach to risk management. In Palestine and Bangladesh, other partnership and financing options were being explored, including local pooled fund mechanisms and funding through local consortia. Learning from these pilots could provide important evidence both for Sweden and for other similarly sized donors, around the possibilities of extending direct funding.

Quantity of Sweden's indirect funding to LNAs

Given the challenges for Sweden of providing large-scale funding directly to LNAs, indirect funding (through international intermediary partners) is currently Sweden's only route to providing access to funding for local actors. Taking this indirect funding into account, Sweden's own estimate is that around 17 percent of Sida's humanitarian allocation reached local partners in 2022.[22]

Sweden is not alone in failing to reach the Grand Bargain target of 25 percent. Self-reporting on progress in 2022 showed that only thirteen Grand Bargain signatories met the target institutionally that

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[22] Based on estimates provided by Sida in December 2023.

year (including just four bilateral donors) and the data even suggests a decline in the percentage of funding for UN-coordinated appeals reaching local actors (Metcalfe-Hough, et al., 2023).

The evaluation found mixed evidence on the extent to which Sweden's partners felt compelled to increase their pass-through funding to LNAs. Sida's NGO application process for humanitarian funding does request applicants to provide details of how they intend to collaborate with and strengthen local partner organisations and asks for information on the proportion of Sida support that will be channelled to LNAs (see Box 2). This might indicate that Sida looks more favourably on funding applications from organisations that intend to work with LNAs and channel funding to those organisations, though the evaluation has no strong evidence to support this hypothesis. Rather, it appears from interviews that Sida's internal management of its partnerships varies considerably, and the extent to which localisation is a deciding factor in partnership selection is unclear.

Box 2: Localisation within Sida's processes

Throughout the programme cycle with its INGO strategic partners, Sida emphasises the importance of collaboration with local partner organisations. INGOs are asked to provide details of the following:

At the application stage, INGOs making multi-year applications for Sida funding are asked for details of how they collaborate with local partner organisations; how they support the Grand Bargain localisation agenda; and provide an estimate of the percentage of pass on funding to local organisations. Sida's NGO guidelines include a definition of NLAs, which aligns with the Grand Bargain definition (Sida, 2023).

Once an INGO has entered into a multi-year agreement with Sida, they are requested to submit annual supplementary organisation applications with additional detail of how the

organisation collaborates with and strengthens national and local partner organisations, as well as data on the proportion of Sida funding channelled to LNAs, or alternatively the proportion of their total budget going to LNAs. Organisations that intend to fully self-implement their projects and programmes are requested to explain why.

Annual reports are expected to include reporting on results related to localisations, specifically, the proportion of funds that have been channelled to national and local responders and narrative reporting on local capacity strengthening (Sida, 2020).

Sida's project management system (known internally as Trac) includes multiple references to how international intermediaries should seek to collaborate with local partners. For example, under the heading of 'ownership and sustainability,' Sida staff are instructed to consider: the extent to which international humanitarian partners contribute to strengthening local capacity and ownership; review whether organisations have strategies or policies to guide partnerships with national/local implementing partners; explain whether they have agreements with local partners to allow for overheads in partners' budgets; and show what kind of approach they have in place for risk sharing e.g. financial or security risks with local partners (Sida internal guidance).

Once partnership agreements are in place, there appears to be significant variation in how much Sida encourages greater pass-on of funding to LNAs. One PBA partner noted that discussions with Sida about low levels of passthrough funding had "become a tool for driving change and really prompted a significant jump in our funding to partners". Others emphasised the flexibility of Sweden's support, noting that this had done little to motivate them to channel more of their resources through LNAs; any positive change in that regard had been "internally driven". This was reflected at country level, where

there was a general sense that Sida's commitment to flexibility meant that the amount of funding passed on to LNAs was predominantly at the discretion of Sweden's international partners.

Box 3: Country perspectives on Sweden's influence on its international partners to pass on funding to LNAs

In *Ukraine*, where interviews were carried out with LNAs, there was a general sense that the flow of funding from international to LNAs was increasing. Short-term emergency grants at the start of the response to the full-scale invasion in February 2022 had evolved into longer-term programmes with larger budgets, more of which was being passed to local partners as trust developed and local-international partnerships were strengthened. There was little sense, however, that Sweden had explicitly requested, or even encouraged, its international partners to do this. Rather, the impetus had largely come from the partners themselves, in line with their own operating models and in response to their own commitments on localisation.

Similarly in *Myanmar*, onward channelling of Swedish humanitarian funding was perceived to be at the discretion of international intermediary organisations. In *DRC*, Sida was highly regarded as a flexible donor, allowing its partners to rapidly allocate funding in response to humanitarian need in an ever-evolving protracted crisis. This flexibility, however, was perceived by some interviewees and survey respondents as a missed opportunity to motivate international organisations to pass on more funding. The same sentiment was expressed in *Palestine*, where Sida's commitment to flexibility was perceived as being in tension with a more assertive approach on localisation.

Indirect funding to LNAs through Pooled Funds

Pooled funds are an important way in which many donors, including Sweden, seek to pass more of funding to local and national NGOs. Sida is a long-standing and generous donor to the Country-based Pooled Funds (CBPFs), managed by the UN Office for the Coordination of Humanitarian Affairs (OCHA). Between 2016 and 2023, Sida provided approximately 8 percent of all donor contributions to the CBPFs.[23]

Localisation is explicitly recognised as a secondary aim of the CBPFs – the primary aim being to address humanitarian needs (OCHA, 2022). Indeed, CBPFs have made good progress in recent years in channelling increasing amounts of funding to LNAs and have published good quality data to show how much of CBPF funding is allocated to local and national responders (see also sections 4, 5 and 6 for more on Sweden's engagement with the CBPFs). In 2022, over a third (36 percent) of total CBPF allocations went to LNAs – a total of USD 441million (OCHA, 2023).

Sweden contributes to most but not all CBPFs.[24] Analysis of the Swedish-supported CBPFs shows an increasing proportion of funding channelled through LNAs, reaching a high of 30 percent in 2022 (and 35 percent mid-way through 2023).

[23] Data sourced from the CBPF Data Hub: https://cbpf.data.unocha.org/ as of 20 October 2023.
[24] Between 2016 and 2023, Sweden has contributed to CBPFs in: Afghanistan, the Central African Republic (CAR), Colombia, DRC, Ethiopia, Iraq, Jordan, Lebanon, Myanmar, Nigeria, the occupied Palestinian territories (oPt), Pakistan, Somalia, South Sudan, Sudan, Syria, Syria Cross Border, Ukraine, Venezuela and Yemen.

Figure 4: Funding to LNAs from CBPFs supported by Sweden
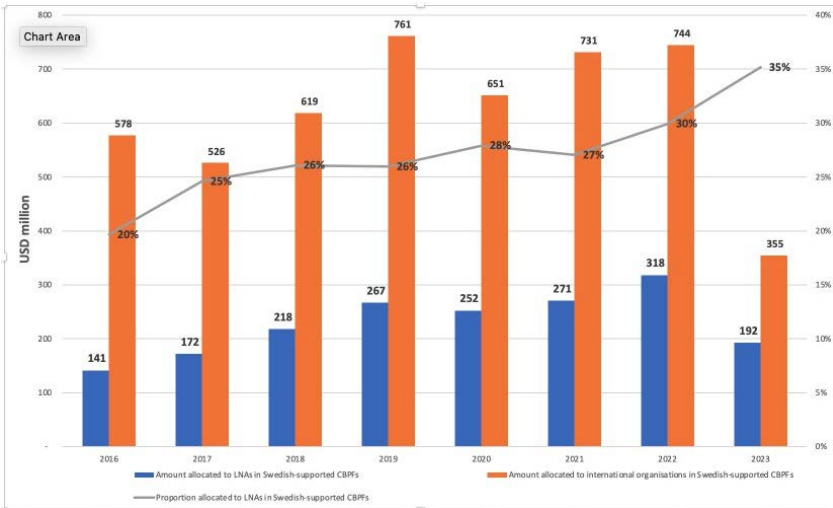
Sweden also contributes to the UN-managed Central Emergency Response Fund (CERF). As with the CBPFs, an increasing proportion of CERF funds are indirectly channelled to LNAs – approximately 18 percent in 2022, up from 13 percent in 2013 (Development Initiatives, 2023). Technically, this cannot be counted towards the Grand Bargain 25 percent target, however, given that only UN agencies are eligible to receive CERF funding and any funding to reach LNAs is therefore channelled through at least two intermediaries.[25]

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[25] On only one occasion has CERF funding been channelled through NGOs rather than UN agencies. In June 2020, USD25 million of CERF funding to 24 NGOs (both national and international) responding to the COVID-19 pandemic (Poole L., 2021).

Transparency of Sweden's indirect funding to LNAs

The amount of funding that reaches LNAs indirectly is difficult to calculate. Despite Sida requesting INGOs with multi-year agreements to provide this information (see box 2), not all organisations do so. Our research team also attempted to gather this data from all of Sida's humanitarian strategic partners, at both global and case-study country levels but was unable to collect a sufficiently robust dataset to confidently estimate how much of Sweden's humanitarian funding is transferred onwards to LNAs. Out of twenty UN, NGO and Red Cross partners reporting to Sida on funding they received in 2022, four provided full data on the amount or proportion of money that they had passed on to LNAs; four provided partial data; and twelve provided no data at all.[26]

This lack of transparency is not unique to Swedish funding. The most recent Grand Bargain review noted that the majority of signatories had failed to report how much of their funding is channelled through LNAs. This data was not being reported through either the Grand Bargain self-reporting process or through established financial tracking platforms, notably OCHA's Financial Tracking Service (FTS) and the International Aid Transparency Initiative (IATI) (Metcalfe-Hough, et al., 2023). There are a number of reasons for this. It is technically difficult, and sometimes impossible, for some organisations to separate Sweden's contribution from the funding they receive from other donors and specify the proportion of Sweden's grant that was passed on to local and national partners. This challenge was raised by a number of interviewees at both global and country levels. That said, Sida's NGO guidelines do acknowledge that where it is difficult to disaggregate Sweden's funding from other sources of revenue, organisations should provide data on the proportion of their total income that flows through LNAs (see box 2).

[26] Based on Sida's Strategic Partners' Annual Reports, 2022. Reports for a further four of Sida's partners were also reviewed but were not included in this analysis since their operational model does not include work with local partners.

A lack of incentives, rather than technical challenges, emerges as the main barrier to greater transparency of indirect funding to LNAs overall, made worse by donor inconsistency in terms of requiring better tracking and reporting (Metcalfe-Hough, et al., 2023). Sweden – proud to be a flexible and trusting donor – appears particularly reluctant to consistently require its partners to comply with reporting requirements on funding passed on to LNAs. Some of Sweden's partners appreciated the lack of pressure to report on funding to LNAs, arguing that it gave them latitude to use Swedish funding to invest in other important aspects of quality programming that other donors were less willing to fund. Other interviewees, including those working with international organisations, said that Sweden had actively encouraged them to share data, and that more consistent and assertive pressure would be helpful in putting pressure on their own organisations to make share more resources more consistently with local partners.

Box 4: Country perspectives on the transparency of Swedish humanitarian funding

In *Myanmar*, local organisations were particularly frustrated at the lack of transparency within humanitarian funding. Not only did they express frustration at not knowing how budgets were divided, but also at the lack of clarity around how funding decisions were made and ultimately how international organisations spent their share of the money. The lack of transparency was described as "not empowering".

In *Ukraine*, international organisations stressed the technical challenge of differentiating Sweden's contribution from other funding sources. In some cases, this meant that local organisations were not even aware that they were indirectly receiving Swedish funding, and often referred to INGOs as donors rather than intermediaries. One national interviewee in Ukraine noted that "it depends on the INGO if they tell us or not. I assume they may not know themselves what's included in

the costs basket". The same experience was echoed in *DRC*, where a lack of upward transparency meant that several LNAs only realised that they were receiving indirect humanitarian assistance from Sweden because they were contacted for this study.

In several other countries, interviews with Swedish Embassy focal points revealed that they too were often unaware of how much of their funding was flowing to LNAs, other than through CBPFs, which had generated a degree of internal frustration in some cases.

Effects of financial risk management

There is already a significant amount of global literature on the issue of risk assessment and management in relation to localisation. In short, compliance and due diligence requirements – as a way of minimising and reducing donor's fiduciary risks – are considered a barrier to localisation and perceived as disproportionately burdensome for LNAs (Barbelet, et al., 2021; Robillard et al., 2021; Humentum, 2023; Cabot Venton, et al., 2022).

Box 5: Country perspectives on risk management procedures and their impact on localisation

Interviews at the country level elicited strong views on the issue of risk management and compliance procedures, particularly in complex contexts with worsening security situations. Many spoke about the risk appetite of donors in general, rather than referring to Sweden in particular.

In *Myanmar*, local NGOs described bureaucratic requirements as a deterrent to applying for humanitarian funding. Even in the case of the Myanmar Humanitarian Fund – one of the largest sources of funding for local and national NGOs in the country – eligibility for funding was constrained by the complex and contentious issue of legal/registration status.

> In several complex contexts – including *Afghanistan*, *Somalia*, *Yemen* and *South Sudan* – the overall risk appetite of donors was perceived to have reduced in response to deteriorating security situations, particularly in contexts where sanctions measures are enacted under their jurisdictions. Interviewees and literature in some contexts noted that this had led to a concentration of funding being channelled to a few larger and more mature local and national NGOs, leaving smaller and newer NGOs without access to resources (ACAPS, 2023).
>
> In *Ukraine*, several INGOs shifted the focus away from Sweden and criticised their own risk management procedures, which in some cases had led to delayed disbursements and late financial reporting.

Nearly half (46 percent) of online survey respondents highlighted the real and perceived capacity constraints of LNAs and their ability to adhere to donor compliance requirements as a barrier to localisation. Similarly, interviewees from many of Sweden's international partners highlighted risk management/compliance requirements as a barrier to them being able to pass on more quality funding to their downstream partners, with audits emerging as being particularly burdensome.[27] Some INGOs noted an internal tension within Sida, whereby their conversations with the Unit for Humanitarian Assistance encouraged "new and ambitious thinking" on localisation, while their interactions with 'Controllers', 'audit advisors', and other Sida staff tasked with managing fiduciary risk, tended to create obstacles and acted as a deterrent to sharing funding more equitably with LNAs; or, in the words of one INGO, led to "a full stop from the compliance side on technicalities."

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[27] Sida stipulates that its cooperation partners commit to ensuring that the use of funds is subject to an annual, qualified and independent audit. This applies to all Sida's direct and indirect partners, regardless of their size or capacity, or the nature of the operational environment in which they work. For contributions of less than SEK 500,000 (the equivalent of around USD 49,000), other forms of control can be used (Sida, 2022).

Several organisations perceived Sweden as becoming more risk averse rather than less, in what one interviewee described as "a counter trend to localisation". As a result, there are instances where organisations have avoided sharing Sida funding with local and national partners that they do not expect to be able to meet Sida's stringent financial management thresholds – referred to as "destructive risk-avoidance" – rather than a more constructive process of "dialogue and engagement to address compliance challenges".

Somewhat surprisingly, counter-terrorism measures were not raised as a particular issue during interviews at either global or country level; other than in the sense that counter-terrorism and sanctions measures complicated the process of working with LNAs in general, for example, in the transfer of resources through approved banking institutions. [28] Sida staff clarified that the standardised counter-terrorism clause in its partnership agreements was not included in agreements with humanitarian partners, in recognition of the complex nature of humanitarian operational environments. This demonstrates a level of flexibility within Sida's approach to risk, which offers potential for greater case-by-case latitude with the implementation of other aspects of Sida's risk management procedures.

3.3 Funding quality: does it support and enable localisation?

Funding for overheads of LNAs: Of all the aspects of quality funding that stakeholders raised during consultations for this study, adequate resourcing for the overheads of LNAs emerged as the most pressing priority. [29] Overheads can be defined as expenditures

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[28] This was the case for at least one of Sida's partners, who said that sanctions had led to severe delays in project funding in the case of Syria, and had made it impossible to transfer funds at all via banks to support humanitarian programmes in the Democratic People's Republic of Korea.
[29] Overheads are also referred to in literature as indirect costs or indirect cost recovery, depending on the organisation or the publication.

outside of direct operating or normal programme implementation costs (IASC, 2022). Adequate funding for overheads is essential for delivering quality programmes and building organisational capacity, but LNAs are often expected to cover indirect costs within direct budget lines. The provision of overheads to local and national NGOs can, in the words of the Inter-Agency Standing Committee (IASC), be viewed as, "a step toward redressing some of the inequities in the humanitarian financing system." (IASC, 2022).

In terms of its direct partnerships with international organisations, Sweden does not have a limit on provisions for overheads. In the case of UN agencies, overhead rates are standardised at the global level; while for INGOs, there is no specified maximum amount or proportion that Sida will agree too, nor is there a particular motivation within Sida to reduce overheads. The same principle applies to the overheads of the local partners of Sida's partners – Sida has no restrictions, other than ensuring that partners' overheads are well labelled and there is no double counting within the budgets of international and local/national partners.

Some but not all of Sida's international partners have their own organisational policies on the passing on of overheads to local and national partners, including a percentage or a range of percentages that can be included in budgets from LNAs – varying between 4 percent and 7 percent according to organisational policies shared with the evaluation team. Even without policies in place, there were examples of international organisations providing and sharing overheads with their local and national partners, though rates and practices differed significantly, and some percentage maximums were disappointingly low.

There was mixed evidence of Sweden's interest in understanding the overhead policies of its strategic partners. Some said that Sweden had shown an active interest and in one case had "prompted the development of its organisational overheads policy". There was also counter-evidence, however, suggesting a lack of clarity within Sida on how much it was willing to support its partners to pass on

overhead costs and to cover "double overheading". A pilot approach by Oxfam to share overheads with its Sida-supported partners may yield findings to support more consistent Swedish engagement on this issue.

Box 6: Oxfam and Sida pilot on overhead cost sharing with local partners

Current practice within Oxfam has meant that the provision of overheads to local partners varied considerably between projects and countries, as is the case for a number of international organisations. Oxfam and Sida agreed to work together during the financial year 2023–2024 to pilot an alternative methodology for the distribution of overheads with Oxfam's local partners.

The alternative methodology states that, where Oxfam is implementing jointly with LNAs, overheads are divided proportionately between Oxfam and its local partner(s) at a standard rate of 7 percent of the total project/programme budget). In other words, if a local partner is doing 80 percent of the project delivery, they also receive an 80 percent share of the overheads associated with the project budget.

Early learning from the pilot indicates some reluctance on the part of local partners to spend funds allocated to overheads, due to a lack of understanding of what is covered within the budget and the associated compliance measures. The overhead distributed under the 2023–24 pilot diverged slightly from the IASC definition of indirect cost for 3 reasons, namely: the Sida overheads were strictly time-bound to the duration of each project, the local partners had to spend their overheads in support of existing project budget lines and lastly, the LNA's overheads were subject to an annual donor audit. The level of conditionality raised questions and caused reticence among recipients to spend the overhead attributed to them.

> Sida has dedicated considerable time to raising awareness and responding to questions from Oxfam programme staff and local partners to mitigate against potential underspend (Oxfam, 2023). At the time of writing, a lessons learned exercise was planned to reflect on the initial pilot, draw out additional learning and refine practice for the remainder of the process. In preparation for the second year of the pilot, Oxfam and Sida are building on the lessons learned and have endeavoured to reduce the level of conditionality applied to the overheads received by LNAs.

Interviewees suggested that donors, including Sweden, could do more to mandate and incentivise quality funding via a stronger policy on the passing on of overheads to LNAs. This was strongly echoed by the online survey, which included several comments from participants encouraging more consistent and equitable funding of overhead costs by Sweden. One local survey respondent argued that "the same budget flexibility and overheads costs should apply to local actors as it does for the INGOs who receive funding from Sweden". Others suggested "a mandatory provision for overheads between international organisations and local partners" and "a separate and additional budget line – additional to the standard indirect cost rate applied to intermediaries – for local partner overheads".

Other bilateral donors have set a precedent in this regard, including Denmark and the United Kingdom, who provide additional funding to intermediaries to cover the overheads of their local partners; and the Netherlands and ECHO, who clearly state that their international grantees should share their indirect costs with their local partners (IASC, 2022; European Commission, 2023). Similarly, OCHA's new CBPF Guidelines stipulate that overheads of up to 7 percent should be applied to all funding recipients and shared equally between partners and sub-partners in the case of sub-contracting arrangements (OCHA, 2022).

Timeliness and predictability of Sweden's indirect funding for LNAs

Sweden has made good progress towards extending the timeframe of its funding agreements with international partners. According to Sweden's own Grand Bargain self-reporting on its progress in 2022, almost 80 percent of the MFA's core support to UN agencies and the ICRC was multi-year, and 20 percent of Sida's total humanitarian allocation was multi-year in 2023 ((MFA, 2023).

While this is an important achievement, longer-term funding agreements are not always passed on to downstream partners. Notably, Sida's multi-year agreements with international partners do not stipulate that longer-term funding should be shared with LNAs. In any case, many of Sida's international partners still do not benefit from multi-year support, or only receive it in selected contexts. They noted in interviews that Sida's predominantly annual allocation and proposal cycle resulted in limited time to implement programmes, which in turn compromised their ability to move beyond a sub-contracting model with LNAs (see Section 4, partnerships). In the case of one INGO, even with pre-financing from headquarters, short-term funding cycles meant that "in-country colleagues can be late to get going with contracting local partners as they are uncertain about the nature or focus of Sida funding".

For LNAs, the evaluation found that short-term funding cycles impacted on their ability to recruit and retain quality staff, given that staff contracts are often project based (see also, Featherstone and Mowjee, 2022), and compromised their ability to invest in their own sustained institutional development (see section 4, partnerships).

Box 7: Country perspectives on the short-term nature of funding

Key stakeholders in almost of all the countries covered by this evaluation commented on the problems of short-term funding, both from Sweden and other donors. Interviewees in *Myanmar* and *DRC* highlighted the need for more multi-year funding to sustain the operations and capacity development of local organisations. In *South Sudan*, one interviewee noted that short-term funding cycles meant that LNAs were obliged to perpetually chase funding opportunities rather than focus on the delivery of quality programmes. In *Palestine*, stakeholders highlighted the protracted nature of the crisis and stressed the need for "strategic longer-term funding to contribute to the stability of local and national NGOs".

The slow disbursement of project funding to LNAs and the stop-start nature of funding were also highlighted as problematic, particularly in the case of *Ukraine*. Interviewees from LNAs explained that delays had been harmful to the reputation of LNAs – in some instances, negatively affecting their relations with communities in urgent need of assistance. It was unclear in these instances whether delays were due to Sida's allocation processes or those of intermediary organisations.

Sida's contributions to CBPFs, while generally consistent year on year, are linked to Sida's annual HCA process (see Section 1), introducing a degree of unpredictability. In some instances, countries and crises had fallen off the priority list for Sida following its needs-based analysis, meaning a sudden end to Sida funding for specific pooled funds and other humanitarian partners. In Sudan, for example, where Sida had supported the Sudan Humanitarian Fund for several years, the decision to discontinue funding in 2022 came as a surprise and was said to "disrupt relationships with partners". There are precedents for Swedish multi-year funding to CBPFs – the examples of Ethiopia and Yemen were given – but even in these instances, only minimal second-year allocations have been provided.

4 Localisation dimension three: partnerships

Section overview and summary

Changing the status quo of partnerships between international actors and LNAs is a central dimension of commitments to shifting the balance of power as well as resources. The Grand Bargain called for blockages to partnerships to be addressed and its localisation workstream called for greater equality in partnerships. Localisation performance frameworks seek to measure how equitable and complementary partnerships are, based on the quality of relationships; a shift from project based to strategic partnerships; and genuine engagement of partners throughout the programme cycle. (Featherstone, 2019).

This section examines Sweden's performance on four aspects of quality and equitable partnerships which are both common in measurement frameworks and emerged in the design of our evaluation framework: the extent to which Sweden makes quality partnerships a priority; the extent to which selection of LNA partners is equitable; the quality and equality of the partnership relationships; and the balance of co-ownership of risks in these partnerships. These areas of inquiry revealed that:

- Sida does actively consider the quality of partnerships with local actors when it selects and assesses international partners.

- However, the lack of clear expectations of what constitutes 'quality partnerships' and of systematic monitoring, means that Sweden is neither able to effectively incentivise good practice, nor understand the quality of its international partners' relationships with LNAs.

- Fair and equal access to partnerships remains uneven: while Sweden's intermediaries may have clear selection policies on paper, in practice they often still gravitated towards a small group of LNAs who had already demonstrated their ability to meet onerous eligibility requirements.

- Genuine co-ownership of risk is a rarity: Sweden and its intermediary partners tend to prioritise mitigating fiduciary risks perceived to be posed by LNAs, than on mitigating the security risks faced by these LNAs.

4.1 Prioritisation: to what extent does Sweden prioritise quality partnerships?

Shifting power to LNAs demands moving from a hierarchical model of partnership agreements wherein LNAs are 'sub-contractors' – to a model wherein they are engaged as equal partners. The Grand Bargain Localisation Workstream (2020) was clear that shifting away from sub-contracting means involving LNAs from the outset in the terms of the agreement, recommending that "Local actors are treated as equal partners, not sub-contractors presented with already agreed projects and budgets" (GB Localisation Workstream, 2020).

Partnership models can be categorised as ranging in degree of hierarchy from the 'directive' model (sub-contracting), to the 'supportive' and the 'cooperative' (Stoddard et al., 2019). However, multiple studies suggest that the 'directive' model remains the dominant mode of partnership in humanitarian action (see IAHE, 2022; Robillard et al., 2021), with intermediaries tending to 'work through, rather than work with' LNAs (ALNAP, 2023). Partnerships are often established with the aim of delivering on intermediaries' pre-agreed programme objectives, rather than supporting the strategic objectives of their LNA partners. Indeed overall, previous reviews of global progress on localisation, suggest a low baseline for achieving equality or equitable partnerships

between international organisations and LNAs. A 2019 survey found that less than a quarter (24 percent) of LNAs felt that they were in a 'genuine partnership,' and international organisations were only marginally more positive in their assessment (27 percent) (Schmalenbach, 2019).

Views were split on the question of whether Sweden was prioritising promoting quality partnership in its approach to localisation. Exactly half of respondents to our survey felt supporting more equal partnership between its international partners and LNAs was a demonstrable priority for Sweden. SPOs also expressed mixed views in interviews, some noting that Sida had sent a clear message that quality of partnerships was of equal importance to volumes of funding, but as noted in section 2 (strategy), others expressed concern that Sida was too narrowly concerned with financial targets. One INGO representative noted that official terminology indicated that Sweden was "behind on concepts that are an accepted part of the localisation debate. So far, Sida is still very much talking in terms of 'implementing partners' lingo rather than equitable partnership and leadership. It is clearly there among many individuals – but it's not evident at a systems level and doesn't give impression that it's as high a priority as with other donors." Views were also mixed among LNAs: for example, interviews in Ukraine revealed that smaller LNAs tended to be more positive about their partnerships than larger LNAs were, possibly because these larger organisations had more exposure to international agencies and more partnership agreements with them.

Quality of partnerships with local actors is a consideration in Sida's selection and assessment of SPOs (see box 2), in line with the recommendation from the Grand Bargain Caucus on Intermediaries (Grand Bargain, 2022). Internal guidance for Sida staff in charge of managing contributions prompts them to ask whether the international organisation has a partnerships policy or strategy to guide its partnerships with "national/local implementing partners" and what its approach is to risk-sharing (Sida, 2023).

Our review of SPO's policies suggests that while several, including Islamic Relief, Oxfam, SRK and IRC (see box 9 below) do have active or emerging policies, several others appear not to have policies or guidance in place. So, as noted in section 2, Sida posing the questions about partnership approaches can be an important prompt for potential and existing SPOs. Indeed, officials covering operations in Ethiopia, Palestine, Somalia and South Sudan all reported that they specifically asked potential SPOs about their partnerships with LNAs and discussed this with them throughout the funding cycle. But again, without a clearly articulated internal reference point on what the benchmarks for quality policy or practice are, the degree of influence may be limited and discretionary. Combined with the over-riding ethos of being a 'hands-off' donor and with over-stretched staff capacity – a concern that permeated discussions with Swedish officials – this led to a lack of systematic follow up.

4.2 Partner selection: are local partnerships based on open processes?

As Sweden and its SPOs seek to increase the number and financial value of their partnerships with LNAs, having a fair and transparent partner selection process becomes more important. Previous global reviews on localisation have raised shortcomings among intermediaries: while they often had clear policies for choosing between partners, the route to this selection stage was less open. Identification of potential partners tended to rely on word of mouth rather than concerted outreach and mapping of the best placed LNAs. This led to opportunities being offered to a small group of established preferred partners, placing significant pressure on these organisations to scale up, and prompting concerns about equity and representation (Stoddard et al., 2019, Robillard et al., 2021). The recent review of the inter-agency Yemen response was unequivocal that this was problematic for the credibility and effectiveness of the response, finding that: "the selection of national NGOs as

implementing partners does not appear to be based on a mapping of protection vulnerabilities of local populations and an assessment of local NGO capacity and community networks. The lack of such assessments contributes to perceptions of favouritism and puts those having better access to United Nations agencies and international NGOs in privileged positions." (IAHE, 2022) – a position which is often overwhelming for the favoured few. To avoid such exclusivity, the new ECHO localisation guidance calls for an enhanced analysis of actors already in place, including 'off the radar' and less formal groups, in order to enlarge and diversify the scope for partnerships (ECHO, 2023).

For Sweden, the partner selection processes of the CBPFs are particularly important. This is not only due to their importance as a means of channelling Sida funds to LNAs, but also because qualification for CBPF funding is often also taken as a short-hand quality assurance according to our interviewees. These LNAs are then forming the partner short-list for other donors and inter-mediaries. Indeed, Sida was looking to the lists of CBPF partners as it developed its pilots for direct grants in Palestine (see section 3). Yet CBPF and LNA staff alike have expressed frustration about selection practices. In Yemen for example, the inter-agency evaluation highlighted a deep lack of trust and transparency in the relationship between LNAs and the Yemen Humanitarian Fund (IAHE, 2022). However, the DRC Humanitarian Fund offers replicable good practice: here Sida funding was contributing to concerted efforts to reach out to a wider base. The Fund has been piloting thematic calls for expressions of interest in order to map potential LNA partners and identify scope for collaboration.

Coordination of selection criteria

Making partner selection processes more accessible also implies simplifying and streamlining eligibility requirements. At present, Sweden's SPOs have multiple different eligibility requirements.

Taken alone, each of these can present unrealistic demands for LNAs, but taken together they present an unfeasible bureaucratic burden for many small organisations. As we have seen in section 3 (funding), interviewees from SPOs and LNAs in multiple countries raised concerns that compliance thresholds were too high for many LNAs to meet. In Ukraine where this was a major concern among both LNAs and INGOs, some said that it was a direct result of onerous and uncoordinated donor requirements. One INGO representative put it this way: "donors tell us they want us to work with local partners. And yet no one yet has the courage to reduce the due diligence processes that we're requiring our local partners to jump through – each and every donor for every project requiring the same." But there was also the suggestion that some intermediary organisations, seeking to cover themselves for the range of perceived risks from different donors, may be overcompensating by raising the demands on potential partners. The implications for Sweden – of pursuing common criteria among its fellow donors, as well as its SPOs – clearly resonate with the other Grand Bargain core commitment to harmonise and simplify reporting requirements.

The creation of the UN Partnership Portal has been heralded as a breakthrough for bureaucratic harmonisation, a major success of the Grand Bargain process, as well as a potential step change for LNA access to partnerships with the UN agencies which are Sweden's main intermediaries. Launched in 2018, and now rolled out to include eight UN agencies and the UN secretariat, the Portal enables civil society organisations to access partnership opportunities through a single harmonised process. As it is open to INGOs and LLNGOs alike, one UN agency representative suggested that it "puts them on an equal footing in terms of visibility and access to UN agencies." and noted how it was used at the start of the full-scale invasion of Ukraine – enabling them to instantaneously retrieve the list of established local partners of other UN agencies.

Prospective partners for the CBPFs are also required to register on the UN portal, and the Global Guidelines (UNOCHA, 2022), revised in 2022, set out a common eligibility process applicable to all 19 of these Funds. However, the demanding nature of this four-step process and the criteria within them[30], were seen by many LNAs to be prohibitive: for example, in Ukraine, the Humanitarian Fund's requirement that applicants be formally registered for at least three years was felt to preclude many newer, smaller, but potentially better placed LNAs. As section 5 outlines, the Pooled Funds do have dedicated resources to support potential partners to pass their capacity assessments, but this would not overcome all barriers to entry, and there is a role for Sweden to use its position on the Pooled Fund Advisory boards to examine the appropriateness of all criteria in any given context.

4.3 Partner engagement: do Sweden's direct partners have equitable agreements with LNAs?

Resistance to sharing power and resources remains a persistent blocker for equitable partnerships. In the words of one LNA in Myanmar: "Localisation is "power relationship" […] Localisation is also moral responsibility – it has to be ethical approach. Power-unbalance is the biggest challenge." Over a third of respondents to our survey agreed that this was a main barrier to localisation.[31] Tellingly, this concern was significantly lower among UN agencies and INGOs, than it was among LNNGOs. And levels of concern about insufficient power-sharing were highest among Swedish

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[30] These are 1) preliminary screening 2) registration in the UN partner Portal 3) due diligence and capacity assessment 4) assignment of initial risk level.

[31] When asked to select the main barriers to localisation 36% of respondents selected the 'willingness and ability of international intermediary organisations to share power and/or resources with local and national actors'.

officials – with over half of these respondents identifying it as a major barrier.[32] This concern was reiterated by Swedish government staff working in and on country programmes including Bangladesh, who reported that they were actively encouraging their SPOs to move beyond sub-contracting.

Box 8: perceptions of equitable partnerships in Ukraine

> The contradictory views about the engrained hierarchies in partnerships are best illustrated by interviews conducted in Ukraine. Here, several of Sweden's SPOs noted that they were actively working in a less 'top-town' way, and almost all LNAs reported that they saw their relationship with intermediaries as a partnership rather than a sub-contract. Yet at the same time, most LNAs referred to the INGOs they were working with as 'donors', rather than partners, an entrenched perception of power dynamics which may hinder equitable partnerships. In the words of one INGO representative: "many LNAs perceive us as an international donor, and not as an organisation to work as a partner with. Many local partners perceive themselves as implementing partners, not as partners."

Building partnerships on equitable terms requires sustained engagement – which international intermediary organisations need to be supported and incentivised to pursue (Robillard et al. 2021). Positive examples of long-term relationships in South Sudan include a 15-year relationship between DanChurch Aid and Church & Development (Schmalenbach, 2019). Such sustained investments in relationship-building are at odds with the short-term approach prevalent in humanitarian funding and suggest the need for connection with development investments including from civil society strengthening (see section 2, strategy).

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[32] By respondent type 52% of Swedish government respondents selected the option in footnote 3 above; followed by 42% of national NGOs; 39% of local NGOs; 30% of INGOs; 6% UN agencies.

Sweden's commitment to multi-year agreements with its SPOs, does have potential to enable SPOs to invest in multi-year relationship building. However, it is neither automatic nor proven that this translates into practice. As section 3 (funding) revealed, the benefits of flexible and multi-year funding are not routinely passed on to LNAs. And where benefits are passed on in the form of investments in longer relationships, this is hard to attribute to Swedish support as unearmarked funds are mixed with funds from other sources.

The short-term nature of international staff deployments also hinders the ability to co-create equitable agreements and ways of working. Without a consistent in-country interlocutor within the SPO it is hard to build trust and co-ownership with LNAs. Studies in Yemen found that a combination of remote management, career structures, and leave policies resulted in a high turnover of international staff. This limits the understanding of the context and partners and makes it hard to build or sustain meaningful relationships (Colburn, 2021). This was echoed by LNAs in Ukraine, who reported that the high numbers and high turnover of international staff deployed after the start of the full-scale invasion in February 2022, made it hard for LNAs to engage on even the most basic administrative matters let alone undertake joint planning, as they often had to raise the same issue several times with different people.

Box 9: IRC's approach to quality partnership

The international Rescue Committee (IRC) is one of a group of INGOs which has a PBA modality to deliver humanitarian support with Sida funding. This modality provides unearmarked funding to be used flexibly against the selected IRC country strategies. IRC has a clear partnership system, incorporating policy, process, guidance and tools, set out in its Partnership Excellence for Equality and Results System (PEERS) (IRC, 2022). This includes provisions for collaborative risk management and for co-design of programmes – guided by principles of equality, complementarity, mutuality, solidarity, result-orientation and

humility. It has been updated in line with the organisations' strategic plan – Strategy100. The plan commits the organisation to ask 'why not partner' whenever planning programming and to meet the 25 percent funding target by 2024. It also commits to 'partner as equals' by developing long-term strategic partnerships with LNAs, over half of which should be women-led or women-focussed organisations. In 2022 as part of the IRC DRC country programme's Strategy100 process, the country team convened a forum of LNAs to hear their perceptions and experience of partnering with them. According to IRC staff, this revealed particular concerns around the fair sharing of overheads by INGOs with their LNA partners, catalysing reflection and change in the organisation of how it applied its policy of aligning pass-on of overheads at a percentage rate which aligned with that given by the donor.

Sida does prompt its staff to ask SPOs about their partnership policies, and there is also evidence that it is a topic of dialogue. However, Sida does not require routine reporting of the quality and equality of SPO partnerships. This perpetuates a generally low evidence base: interviews for this study revealed that while some SPOs did self-report some discrete examples of joint decision-making, they did not yield a solid body of evidence about the degree of equitable partnership across the programme cycle. Sweden is not the only donor that does not set clear demands against which to monitor the quality of partnerships with LNAs (Barbelet, et al., 2021). However, the new ECHO localisation guidance (ECHO 2023) may set an example, by setting partnerships with LNAs the default mode of delivery and where relevant giving priority to intermediaries that can demonstrate that they have equitable partnerships at their core, including by inclusion throughout the programme cycle.

Making and monitoring such demands, once again raises the tension between flexibility and transformation. In Somalia for example, while an SPO interviewee appreciated that Sida wasn't "helicoptering around us about the way we work with local actors", an LNA

respondent felt that Sweden needed to be more proactive in its scrutiny "otherwise nothing will change". One local respondent suggested that Sweden could lead by example as well as by demand: if it were to make local partners more central in the Humanitarian Crisis Analyses (HCAs) that guide their response in any given country, Sida would send a strong signal on the strategic equality of partners.

4.4 Partners' co-ownership of risks: are security risks fairly shared with LNAs?

A hallmark of the unequal relationships between SPOs and LNAs is that, as risks are largely understood as 'risks of' LNAs rather than 'risks to' them. This is reflected in concerns about whether LNAs are inherently less 'principled' or neutral than their international counterparts, given their proximity to communities. Instead of even-handedly considering the trade-offs faced by any actor – international or local – in providing principled humanitarian assistance in inevitably politicised situations, a default lower risk-tolerance threshold is often applied to LNAs (Healy, 2021, Kamal and Benowitz, 2022, Van Brabant and Patel, 2017).

In particular focus on 'risks of' This means there is far more emphasis on ensuring LNAs comply with measures to mitigate fiduciary risks to SPOs and donors, than on ensuring that SPOs and donors mitigate the security risks to LNAs. Given that working in 'hard to reach' locations is a large driver for Sweden's interest in localisation (see section 2, strategy) this imbalance is not only unfair, but also dangerous. LNAs bear the bulk of security risks (Stoddard et al., 2019, Schmalenbach, 2019) and are the victims of a greater number of aid worker attacks than international organisations (AWSD, 2023). Financial precarity may push LNAs to take on contracts and expose themselves to even greater risks (GISF, 2020). As one SPO in Yemen told us "risk transfer has often been the default for agencies – local partners being exposed to risks on the front line."

Sweden and its SPOs are cognisant of the need to co-own these security risks, and to work with LNAs to better understand and reduce them. Swedish officials in Somalia and in Palestine both recognised the risks faced by LNAs and the need for dialogue with SPOs "to create a firewall of support for them." However, on a practical level, international agencies experience tension between ethical practice and the legal or financial implications of extending their duty of care to their local partners – suggesting that Sweden not only needs to ask its SPOs to cover partners' security risks, but also needs to allow sufficient budget space to do so. At present, according to interviews with Swedish officials, security costs are not considered a valid part of overheads and should be included in a specific clearly marked budget line. Once financial allowance has been made, there are then a range of security provisions that SPOs can agree with its partners including training, contingency planning, joint critical incidents teams and incident tracking and reviews.

There is precedent for donors to require SPOs to show how they are explicitly covering their partners under their own security plan (Stoddard et al., 2019). While this has prompted concerns that it would raise the compliance burden (Barbelet et al., 2021), it has also been welcomed as a necessary counter-balance to the default of risk transfer. For Sweden as a donor, raising co-ownership of security risks early in the partner dialogue will be an important first step, followed by working with SPOs to support the co-development of clear risk management plans with the full engagement of LNAs own security insights.

Box 10: LNA's views on security risk transfer in Myanmar

Given the political and security situation, Sweden – like many other donors – has a minimal diplomatic presence in Myanmar, and staff supervising the humanitarian and development portfolios are located outside the country. SPOs also have reduced international presence in country and very limited access to the areas of greatest humanitarian need. Interviews with LNAs in Myanmar highlighted how donors and SPOs are reliant on local partners' ability to access highly insecure localisations – yet how they do not routinely consider the knowledge that they bring or the risks that they face. As one LNA put it "The conflicts are so intense – we are going through the crises – they have to consider the risks we are dealing in our work. We know the ground situation; we know when it is safe. The donors' visit to the camps – these are not viable." Another, noted that local knowledge and experience means that LNAs are best placed to know how to mitigate the risks that they face (see also GISF, 2020) – but what they need is the budget provision to do so: "Local partners the ones that goes to difficult places. There has to be sufficient funds for risks management and risks reduction. This way the local partners can mitigate the risks. This risk management fund allocation is very important and if donors don't ask for this, INGOs might not do."

5   Localisation dimension four: Capacity-strengthening

Section overview and summary

Supporting the capacity of LNAs is an important dimension of the Grand Bargain localisation commitment – signatories signed up to 'increasing multi-year investments in the institutional capacities of local and national responders, including preparedness, response and coordination' (Grand Bargain, 2016). And although the concept of capacity-strengthening is contested and critiqued as inherently problematising LNAs (Robillard et al., 2021), it remains a key pillar of localisation action in the performance frameworks which elaborated on the GB commitments. For example, the NEAR localisation framework sets out the objective of "more effective support for strong and sustainable institutional capacities for L/NA, and less undermining of those capacities by INGOs/UN." (Featherstone, 2019)

This section therefore examines Sweden's performance in five aspects of capacity-strengthening which featured as most important in localisation frameworks and in our findings: the extent to which Sweden prioritises support to capacity strengthening; the relevance of such support to the actual requirements of LNAs; the mitigation of capacity-depleting practices by Sweden's international partners; the degree to which efforts support sustained strength of LNAs; and whether Sweden supports harmonised capacity strengthening efforts among its partners. The findings show that:

- Sweden's international partners regard capacity-strengthening as a higher priority for Sweden than Swedish officials did – reflecting a tension between directing resources towards 'life-saving' activities, and directing resources to build organisations to deliver this.

- Responsibility for advancing capacity-strengthening was delegated to Sweden's international partners and while several were taking initiatives to do so, it was not pro-actively demanded or enabled by Sweden.

- Efforts by Sweden's international partners tended to be short-term, top-down and ill-coordinated – and instead of being driven by the support needs identified by LNAs themselves, were focussed on building LNAs' capacity to comply with international requirements.

- The already overstretched resources of LNAs were being further depleted by the demands of duplicative and imposed training requirements, and by the 'brain drain' to international organisations – suggesting scope for Sweden to promote and demand wider adoption of ethical recruitment policies among its international partners.

- There is significant, and as yet unrealised, potential for Sweden's humanitarian teams to learn from and align with efforts from Sida's development investments and experience in civil society strengthening.

5.1 Prioritisation: does Sweden prioritise LNA capacity-strengthening?

Reflecting its Grand Bargain commitment, capacity strengthening is a component of Sweden's stated approach to localisation. The commitment to "promote innovative ways to strengthen the capacity of local actors, including through partner organisations" is explicit in Sweden's humanitarian strategy (MFA, 2020), and it is one of the three headline localisation questions that Sida staff are expected to ask of the SPOs that they manage – "how does the organisation contribute to strengthening local capacity and ownership?" (Sida, 2022).

However, there are mixed views of the extent to which these broad intentions translate into implementation. Just over half of our survey respondents (52 percent) felt that capacity-strengthening was a main way in which Sweden advanced localisation. Yet while this was broadly in line with the proportions of LNAs (52 percent) and INGOs (53 percent), UN agencies were far more positive in their assessment with over two thirds (69 percent) believing that it was a main localisation focus for Sweden. And once again, Swedish officials were more negative about this than their partners were – only a third (33 percent) of Swedish government respondents selected capacity-strengthening as a priority area.

There is therefore clearly a gap between what Sweden considers its active localisation priorities and what its SPOs believe them to be. One of the possible reasons for this could be that it reflects Sweden's prioritisation of resources toward needs-based response above all else (see section 2, strategy) – under which logic, investing in LNA capacity is a lesser focus. One SPO noted that "Sida's humanitarian imperative creates a dilemma around how much should be spent on capacity-building as it's less immediately lifesaving. For example, we support self-reliance in protracted crises, but Sida is cautious about funding these interventions as they want to focus on the most severe humanitarian priorities." Indeed, as one country-based official reflected on their lack of discussion with their UN partners about capacity strengthening: "they're working with local partners but they flag things to us that they think are a priority for us as a donor and localisation isn't necessarily a top priority for us. Our top priority is response to needs in a principled way." In other words, advancing capacity strengthening is not seen a direct responsibility for Sweden, but something that their partners should be covering. Indeed, several SPOs reported that while they were taking initiatives to use Swedish funding to advance capacity-strengthening, this was not something that Sweden demanded or explicitly enabled.

5.2 Relevance: does Sweden support demand-led capacity-strengthening?

A long-standing critique of capacity-strengthening approaches is that international actors frame capacity in their own image, looking only for the deficits of LNAs against this standard, and failing to assess, understand and learn from their existing strengths. Capacity-strengthening is too often top-down and one-way, and as such neither enhances nor harnesses LNAs' skills and institutional assets. (Robillard et al., 2021; Schmalenbach, 2019; Howe et al., 2019, ALNAP, 2023). ECHO's recent localisation guidance recognises and seeks to address this, calling for international partners to more routinely and fully assess existing capacities so that efforts are "demand-driven" and not a "one-way endeavour". (ECHO, 2023). The difference in how international actors view LNAs' capacity and how these organisations see themselves was notable among our survey respondents: In our survey, less than a third of LNA respondents (32 percent) selected lack of capacity as a barrier to localisation, compared to around half of those from international agencies (55 percent) and Swedish officials (48 percent).

As Sweden does not directly channel funds to LNA capacity strengthening, nor routinely require or monitor their SPOs efforts to do so, it is difficult to assess the degree to which Swedish humanitarian assistance maintains or challenges the status quo of top-down capacity building. As the independent annual report of all Grand Bargain signatories' progress shows, qualitative evidence on this is self-reported and piecemeal (Metcalfe-Hough et al., 2023). A review of reports from Sweden's SPOs reveals examples of institutional and country-specific good practice, including Islamic Relief's STRIDE programme (Strengthening Response Capacity and Institutional Development for Excellence) (Islamic Relief, 2023), but insufficient evidence for a comprehensive view of practice across Sweden's partners.

Three trends did however emerge from our interviews. Firstly that capacity-building efforts predominantly focussed on enabling LNAs to navigate and meet donor compliance standards. This was a repeated view regarding the CBPFs (see also Featherstone and Mowjee, 2022) which clearly include capacity assessment in their process (OCHA, 2022) (see section 4, partnerships) and which dedicate funds and efforts to capacity-strengthening of potential LNA grantees. CBPF staff in several countries told us that their remit did not extend beyond helping LNAs pass the requirements to access funding, to deeper demand-led support. As one CPBF fund manager told us "we can help them to draft a proposal but not to run an effective health centre." Secondly, that there were very few mentions of SPO initiatives that proactively sought to discuss capacity priorities with LNAs and actively develop plans that would facilitate two-way support and learning. And finally, that capacity building still often relied on bringing in international experts who lacked awareness of the local context – as one Ukrainian LNA lamented "international experts are paid enormous money, and this is training money and at the same time do not understand the situation." The degree of frustration and the limited evidence base on progress, suggest a need for Sweden to both clarify its expectations of SPOs and to follow up on them more routinely.

Box 11: LNA views on top-down capacity strengthening

In *Ukraine*, two of Sida's INGO partners reported that they were taking a more equal and two-way approach to capacity strengthening, in which they would seek to learn from their partners as well as respond to their requests for capacity support. As one reported, "[We have] capacity development, capacity sharing activities. We plan to change the naming (to capacity sharing) so it doesn't sound so top-down from us to local partners."

However, in *Myanmar*, the view from the LNA partners of Sweden's SPOs was overwhelmingly critical. They voiced frustrations that trainings were imposed, not tailored to specific

organisational needs and even stopped short of supporting the organisational changes that the trainings told them to make in order to fulfil compliance criteria. One LNA branded these efforts "a waste of money" and another noted that "the need from the ground is different from the offer from the international agencies."

In *DRC*, Sweden's indirect LNA partners reiterated similar concerns, noting that to be effective, capacity-building had to respond to LNA's stated needs. As one LNA representative put it, "No one can pretend to better know our needs than ourselves. The ideal would be to let us identify the needs ourselves and donors to provide us with the means to address them."

5.3 Capacity-depletion: does Sweden address capacity undermining practices?

International humanitarian organisations can undermine the capacity of the very organisations that they are seeking to strengthen. Indeed, imposition of multiple, often duplicative trainings, can be a drain on already overstretched staff time of small organisations. As one LNA representative in Ukraine told us "We are overburdened by trainings and capacity building trainings – 18 days of 22 days of psychologists go for trainings and capacity buildings. Nobody asked us what specifically we need from training".

The greatest threat that international partners pose to local and national capacity is through 'brain drain' (ALNAP, 2023; Howe et al., 2019, Van Brabant and Patel 2018, Barguios et al., 2021; Robillard et al., 2021). The draw of significantly higher salaries and the lure of direct recruitment approaches create a major staff retention problem for LNAs, depleting knowledge, skills and institutional memory and stability – as well as diverting time and resources to recruitment efforts at the expense of programme delivery. As one Ukrainian LNA reported "They are poaching the staff from smaller local organisations

– our people are leaving. We do more work than international organisations […] but people who know English left for UN agencies to do less but to earn four times more."

Recent practice-oriented research finds that there is no 'one-size-fits-all' solution (HAG et al., 2023). 'Respectful recruitment' has to consider among other context-specific factors, the stage and type of response, the funding environment, and the education and labour market. However, there are requirements that Sweden can actively ask its SPOs to follow in order to prevent and mitigate loss of staff from LNAs. The NEAR localisation performance framework includes KPIs that could be adopted, including that SPOs have and adhere to ethical recruitment guidelines and refrain from actively approaching LNA staff to recruit them. There was evidence that some of Sida's SPOs are already doing this, demonstrating good practice that Sweden can encourage others to build on and learn from. For example, interviews in Ukraine show that despite the huge need for qualified staff among many international organisations, some of Sweden's SPOs incorporated and adhered to ethical recruitment guidelines in their recruitment practices – avoiding actively recruiting LNAs staff, to protect civil society response capacity.

5.4 Sustainability: does Sweden support graduation from capacity-strengthening?

The end-goal or outcomes of capacity-strengthening investments are not explicit in the Grand Bargain and greater investments in supporting LNAs are often seen as a desired change per se. Yet, while all organisations should engage in ongoing learning and development, the problem of not having a clear outcome can mean that, as one LNA was quoted in the State of the Humanitarian System report "capacity-building is a university from which we are never allowed to graduate." (ALNAP, 2022) – keeping them in a limbo of perceived capacity deficit and so not seen as able to engage with the international system on equal terms. At the same time, both

the IASC (IASC, 2020) and ECHO call for sustained investment 'beyond the programme cycle" (ECHO, 2023). The question for Sweden, therefore, is whether its humanitarian assistance facilitates the sustained support necessary to build meaningful capacity within LNAs. Does it promote pathways for them to graduate from capacity strengthening into capacitated access to power and resources?

As sections 3 (funding) and 4 (partnerships) have explored, Sweden's commitment to multi-year funding offers a foundation for sustained support to LNAs. Potentially this enables SPOs to build relationships and work with LNAs over a number of years to understand the capacity priorities of them, support institutional development and to embed two-way learning. However, we also saw that the benefits of multi-year agreements with SPOs do not automatically translate into multi-year investments and strategic engagement with their LNA partners. Despite the persistent frustrations about one-off trainings, there were discrete examples of Swedish support being used for longer-term capacity strengthening. In Yemen for example, one SPO explained how Sweden's flexible funding had enabled a dedicated partnership post in their team, which meant that they could "work with partners to support them in areas they want capacity strengthening in – rather than generic parachuting in of training." Another SPO noted how at the global level they had been able to have constructive dialogue with Sida around supporting LNA partners to sustain operations, as part of "avoiding a paternalistic capacity-building approach". Another SPO noted how based on their observation that a training-focussed approach yielded little sustainable impact, they decided to pivot to a less visible, but more effective facilitation approach to strengthen LNA capacities. Echoing findings in other areas of localisation, Sweden can build on these examples to encourage good practice – adapted to the context and the organisation – to be more of a widespread expectation than a discretionary activity.

Several of Sweden's SPOs observed that capacity-strengthening was noticeably resulting in LNAs being able to directly access funds., When it comes to graduation, however, exit strategies are rarely

explicitly articulated in SPOs' reporting of their capacity-strengthening efforts. IRC is one exception, with its country reporting to Sweden including a routine section on 'sustainability and exit' strategy, including support for continued business planning and income generation.

Sweden's support for the CBPFs offers a positive pathway to greater autonomy for LNAs via direct – unintermediated – access to international funding. Sources in several countries noted that Swedish officials participating in the CBPF Advisory Boards had actively supported capacity-strengthening investments. The success of the CBPFs investment in supporting LNAs to navigate and meet application and eligibility requirements is evident in the rise in numbers of LNAs receiving, or becoming eligible to receive, grants from these pooled funds.[33] Indeed, one CBPF manager noted that support to fulfil the requirements in quality proposal writing and reporting was enabling LNAs to be recognised as the 'best placed actors' that they are: "There have been instances where NNGOs have been selected over INGOs not just on fact that they are local, but on the fact that they score higher than INGOs on KPIs and proposal criteria". However, as noted above and expressed by other CBPF fund managers, these Funds have limits on the type, length of support and the number of LNAs they can cover.

As Sweden develops and potentially extends its pilots for direct funding of LNAs, it will be important for it to consider how it both incorporates capacity strengthening into its package of support, and as well as selecting those partners which are considered to be 'capacity-built.' At the same time, it will need to continue working with its SPOs to support others to graduate to accessing funds directly.

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[33] Data on the number of LNAs eligible or granted funding is not consistently available for all CBPFs. Our review of the 2022 annual reports for the 16 CBPFs that Sida funds revealed that of the 6 that provided data, over 200 LNAs were either granted funds (this data was available for 2 CBPFs) or were assessed as eligible to receive funds (this data was available for 3 CBPFs and partially available for another one).

5.5 Harmonisation: does Sweden support joined-up capacity-strengthening efforts?

As noted above, duplicative and unstrategic efforts risk undermining rather than strengthening LNAs' capacities and resources. Efforts therefore need to be joined-up in two ways: firstly between agencies – including as the NEAR localisation framework sets out, in harmonisation of capacity assessment practices; and secondly between humanitarian and longer-term aid support.

In terms of harmonisation of capacity assessments and activities, there was no evidence to suggest that Sweden was actively encouraging this. Some of Sweden's SPOs noted that they were initiating efforts including in Somalia, where the multi-stakeholder Localisation Working Group was supporting INGO work to harmonise capacity assessments. But as the Grand Bargain annual independent review concluded (Metcalfe et al., 2023) there were missed opportunities for collaboration to join these up, although there were innovative programmes to build the local and national capacities to access funds directly. If Sweden is to use its position and convening power to become more consistently vocal on localisation (see section 2, strategy) this could include promoting greater coordination of capacity strengthening efforts to make them more efficient and effective.

There is also a clear role for Sweden to be more joined-up on capacity in its in-house efforts. Multiple sources recognised that short-term humanitarian funding is inherently ill-suited to supporting the sustained approach that capacity strengthening demands. A humanitarian needs-based approach also sets limits on the degree to which capacity strengthening can be a focus for Swedish humanitarian aid.

As one Swedish civil society expert noted "core support based on long term trust is the preferred modality for local civil society, not just international organisations." Several SPOs noted that they were

looking to development funds to take the necessary long-term approach to supporting LNAs and sustain their institutional stability. With its nexus approach and its well-regarded CIVSAM work, Sweden is well placed to make the connection with humanitarian localisation – but as we have seen in section 2 (strategy), opportunities to do so are being missed. There appears to be a significant amount of learning that CIVSAM efforts in particular can yield for joined-up civil society strengthening efforts. This could be achieved through the Unit's active work on the DAC civil society recommendations, its convening of a task force with its SPOs on locally-led development, and its instigation of its own pilots for direct funding to LNAs. There are initial promising signals, that prompted by the process of this evaluation, dialogue is beginning between these units in order to harness their combined experience.

Box 12: support to the capacity of Red Cross & Red Crescent National Societies

In *Bangladesh*, the Swedish Red Cross (SRK) is receiving CIVSAM support for a 3-year project to support the Bangladesh Red Crescent Society (BRCS), to strengthen communities' resilience. Prior to this, it had received successive years of annual funding from the Unit for Humanitarian Assistance, which despite the uncertainty created by the lack of multi-year guarantees, enabled the SRK to support the implementation capacity of the BRCS to the point where they were able to hand over project leadership to them. The SRK retains a limited role in providing technical and financial support, but operational control now rests with the BRCS.

In *Lebanon*, the SRK is working with the Lebanese Red Cross (LRC) to facilitate a new level of trust-based partnership with Sida, that would replicate the benefits that Sida's SPOs receive under the Programme-based Agreements (PBAs). The SRK is resourcing this with its own funds, but Sida's Unit for Humanitarian Assistance is following the pilot closely to learn

from it with a view to being able to test and replicate the model when the opportunity for new PBAs open under Sweden's next humanitarian strategy period. Part of the LRC's stated priorities for good partnership as part of this approach include a 10 percent budget allocation for capacity strengthening and being a part of direct discussions with Sida.

6 Localisation dimension five: Leadership and participation

Section overview and summary

The Grand Bargain recognises the importance of local leadership and participation in policy and operational decision-making forums (Grand Bargain, 2016 and 2023). Within the original commitments on localisation, Grand Bargain signatories agreed to "support and complement national coordination mechanisms where they exist and include local and national responders in international coordination mechanisms as appropriate and in keeping with humanitarian principles." (Grand Bargain, 2016). As the Grand Bargain has evolved, support for local leadership remains central within the core commitments (Grand Bargain, 2023).

With this in mind, this section considers the extent and effectiveness of Sweden's support for the participation and networking of LNAs in fora and groups at global and country levels. The relatively scant evidence base in this area, and the difficulties in attributing progress to Sweden's efforts, meant that our research did not yield significant findings across common indicators used by other frameworks. Therefore, this section examines findings in four areas: the degree to which LNA leadership and participation is a priority for Sweden; the overall progress by Sweden's international partners on enhancing local leadership and participation; the degree to which Swedish funding indirectly enables this; and the extent to which Sweden uses its presence and influence to promote LNAs' visibility and participation. Key findings are that:

- Swedish funding has been used to indirectly support local and national NGOs to participate in international coordination mechanisms. In some instances, the flexibility of Sweden's funding has allowed its international partners the resources and latitude to support their local partners.

- The evaluation found at least one example of Sweden using its position and influence to advocate for and involve the participation of LNAs in a global forum, enabling them to interface directly with donors and key decision makers.

- There are however fundamental issues of power sharing, and practical issues such as staff time, travel and language which remain barriers to LNA's meaningful participation – and scope for Sweden to use its position and resources to address these.

6.1 Prioritisation: to what extent does Sweden prioritise local decision-making?

Views were mixed on the extent to which Sweden prioritises this dimension of localisation. Survey respondents were generally positive about Sweden's prioritisation of the leadership and participation of LNAs.[34] In interviews, some SPOs also noted that Sida regularly asked about participation and coordination of LNAs as part of its dialogue cycle with partners, thereby signalling it as a priority. Other interviewees, however, did not recall discussing leadership and participation of LNAs with Sida or MFA and claimed that any examples of progress in this area could not easily be attributed to Sweden.

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[34] Fifty seven percent of survey respondents said that support for the leadership and participation of LNAs in humanitarian leadership, coordination and policy groups was a priority for Sweden, making it the second main way (beyond funding) that participants considered Sweden had used its influence to further the localisation agenda.

6.2 Progress: has Sweden supported advances in local leadership and participation?

There has been some progress with the integration of LNAs in humanitarian coordination fora in recent years. The latest Grand Bargain annual review highlights support for LNA's leadership and influence within international humanitarian coordination mechanisms as generally positive, particularly at global level – where it describes a "sea change since 2020" in terms of the influence of LNAs within the Grand Bargain platform itself, and recognises progress within some global clusters (Metcalfe-Hough, et al., 2023). While these are hard to directly attribute to Swedish efforts, these are all fora in which Sweden has considerable 'soft power'.

Despite evidence that international coordination mechanisms are increasingly inclusive of and occasionally co-led by LNAs (IASC, 2021; Metcalfe-Hough, et al., 2023; Featherstone and Mowjee; 2022), international actors continue to dominate decision-making fora, and space for national and local leadership remains restricted (Van Brabant, and Patel, 2017; Baguios, 2021; ALNAP, 2023; ACAPS, 2023). The COVID-19 pandemic did increase LNA's access to coordination forums in many contexts, given the shift to online meetings and processes, but leadership roles largely remained with international actors (Featherstone, et al., 2022; Ullah, et al., 2021).

While evidence of progress exists, barriers continue to hinder LNA leadership and active participation in humanitarian coordination bodies and decision-making fora. These include language barriers (including the use of jargon); lack of staff time for meetings and other coordination processes, which one interviewee described as "onerous"; political and cultural differences; and logistical and technological obstacles, including inadequate sharing of information with LNAs (IASC, 2021).

Box 13: Barriers to local leadership and participation in humanitarian coordination platforms at country-level

In *Ukraine*, several smaller LNAs noted language as a barrier that hindered meaningful involvement of LNAs in coordination meeting – a point also highlighted in literature on localisation in Ukraine (Harrison et al., 2022). One local NGO noted that "cluster meetings are conducted often in English, documents in Ukrainian are not always available. For our organisations it's a problem, as coordinators don't always know English to take part in clusters and actively participate". The problem had been made worse over time due to the "poaching of English-speaking staff" by INGOs (see section 5). In addition, interviewees from local organisations highlighted staff time and resources as a challenge, particularly in terms of leadership of coordination platforms. One local NGO told us that "INGOs are leading in the clusters because they have resources for this – staff and financial. Local organisations can't hire a person to be a cluster coordinator only".

Similar issues were raised in *Palestine*, where international organisations receiving Swedish funding reflected on the barriers faced by their local partners. One international organisation noted that local organisations lacked the resources to participate in humanitarian coordination fora and their motivation was under-mined by the observation that greater participation had not led to increased access to funding. One Swedish-funded INGO we spoke to had attempted to support local partners to participate in coordination fora, albeit unsuccessfully due to a lack of resources. In their words – "We encourage them to participate in decision-making and coordination, but not all of them have the human resources and time to participate, and there isn't room to cover this from their budgets. We work together with them on this."

Interviews in *Yemen* highlighted the same challenges, where one interviewee described HCT membership as "very demanding and there is no allocated funding to support this". A process was

conducted within the HCT to understand the barriers to meaningful participation of LNAs, within which a national NGO white paper to the HCT recommended that international donors and agencies should: a) fund national NGO leadership; and b) address staff turnover in national NGOs by supporting more equitable salaries between international and national NGOs.

In addition, interviews revealed an unwillingness on the part of some international organisations to concede space and decision-making power to LNAs. We heard this from national organisations in one of our case-study countries, who perceived institutionalised resistance in the UN to local leadership, as well as from stakeholders at the global level. One interviewee working at headquarters within the UN told us that, "There are serious financial disincentives to conceding power: if a project isn't selected it won't get funding from the Humanitarian Response Plan (HRP) and then the organisation loses out financially – and so organisations want to be part of decision-making. Donors like Sweden can play a role in nudging UN agencies to share the power."

6.3 Financial support for leadership and participation

The evaluation found examples of Swedish funding that had been used to indirectly support local and national NGOs to participate in international coordination mechanisms. The flexibility of the funding had allowed Sweden's SPOs the resources and latitude to support their local partners in several instances.

Box 14: Flexible funding from Sweden supporting LNA participation

In *Ukraine*, through its strategic partnership with Save the Children, Sweden has financed the position of the coordinator of the national NGO platform, who then represents "and gives a voice to Ukrainian NGOs in the HCT". Through the same grant, Sweden has resourced capacity building for local and national NGOs organised by the NGO forum, and covered travel related expenditures and overall administrative costs for the group.

Meanwhile, in Cox's Bazar in *Bangladesh*, Sweden, again through its partnership with Save the Children, indirectly contributed funds to the NGO Platform.[35] Interviews indicated that through its outreach and capacity building efforts, the Platform had contributed to stronger LNA participation within the Rohingya refugee response effort in Cox's Bazar, and particularly within the Strategic Executive Group, where the Platform was perceived to have successfully elevated the voices of the NGO community, both local/national and international.[36]

In *Kenya*, Sida's funding for Oxfam was used to continue support for the Arid and Semi-Arid Lands Humanitarian Network (AHN). The Network is a platform led by local and national NGOs to promote and enable more locally led responses. Support from Sida (via Oxfam) and other donors is thought to have enabled the AHN to engage with the Humanitarian Coordination Team and influence the content of the Humanitarian Response Plan (Oxfam, 2023).

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[35] See: https://www.ngoplatform.net/

[36] The Strategic Executive Group in Bangladesh represents humanitarian agencies to provide overall guidance for the Rohingya humanitarian response and engage with the Government of Bangladesh at the national level. It is co-chaired by the UN Resident Coordinator, IOM and UNHCR (United Nations, 2023).

At a global level, there were examples of Swedish funding being used to increase LNA access to humanitarian coordination groups. Sida's support to the International Council of Voluntary Agencies (ICVA) has been partially used to facilitate discussions on localisation and support local and national NGOs to participate in coordination and decision-making groups, including through country-based NGO fora (ICVA, 2023). In addition, Sida's funding to the UN Food and Agricultural Organisation (FAO) in 2022 had contributed to its localisation project, within which it aimed to 'increase the voice of local actors in humanitarian coordination mechanisms'. Examples of this in practice was the inclusion of localisation as one of the main pillars of the Global Food Security Cluster strategy, and in the workplans of national Food Security Clusters, including efforts to address the barriers preventing local actors from participating and providing technical and institutional capacity building to increase their 'viability and visibility' (FAO, 2023). Sida's support to Save the Children in 2022 was also partially used for its 'Shifting the Power Project' – strengthening local ownership of international humanitarian coordination, in collaboration with the global Child Protection Area of Responsibility and Education, WASH, and Nutrition Clusters, as well as their country-level coordination groups (Save the Children, 2023).

6.4 Influencing: has Sweden promoted LNA visibility and decision-makers?

Although there is scope for Sweden to use its presence in coordination fora to be more vocal on localisation (see section 2, strategy), there was evidence of it leveraging its position and influence to promote greater leadership and participation. For example, Sweden used its position and influence as the co-president of the European Humanitarian Forum to advocate for and involve the participation of LNAs, enabling them to interface directly with donors and key decision makers.

At country level, Sweden also appeared to have made use of its position on several of the CBPF Advisory Boards to increase access, advocating for more LNA representation and influence in several contexts. Indeed, CBPFs appear to have considerably improved the participation of LNAs in their governance mechanisms over the last five years (Featherstone, A. and Mowjee, T., 2022). The global guidelines for CBPFs now require representation of donors, UN agencies, international NGOs and local/national NGOs, and seek to ensure "genuine, equitable and vocal participation of all four constituencies" (UN OCHA, 2022).

Box 15: Swedish influence within CBPFs to elevate the voices of LNAs

In *Ethiopia*, Sweden had repeatedly stressed the value of LNA engagement on the Ethiopia Humanitarian Fund (EHF) Advisory Board, and in particular the need for female LNA representation. While not necessarily attributable to Sweden's influence, the EHF has recently published an ambitious aim to enhance localisation through the Fund, including equal representation in the Advisory Board through additional seats for national NGO members (Ethiopia Humanitarian Fund, 2022).

Similarly, in *Palestine*, Sweden was perceived by those managing the Fund as being consistently vocal to ensure the representation and active participation of local and national NGOs. While not currently part of the Advisory Board for the *South Sudan* Humanitarian Fund, those managing the Fund said that Sweden had used its influence outside of the Board, through the South Sudan Humanitarian Donor Group in particular, to advocate on behalf of LNAs.

Despite progress at the coordination level, within the project cycle, there is evidence to suggest that international organisations continue to overlook or even supress the contribution of LNAs when interacting with donors (Howe K. et al., 2019, Baguios A. et al., 2021;

DA Global, 2021). One international organisation that we spoke to suggested that Sweden could do more to use their funding and influence to require international organisations to give more visibility to LNAs. They described a lack of visibility for LNAs, including within their own organisation, stating that, "There's always UN/INGO logos everywhere and the local partners are invisible. If donors, including Sida, had a harder and faster rule in the partnership agreement with us about giving visibility to local partners, it would help. Currently our country operations have the discretion to exclude LNAs if they choose and it's hard for us to make progress as an organisation overall."

There is also a role for Sweden to establish channels for direct contact with LNAs, cognisant that this represents another call on Sida and Embassy staff time. While some embassy and Sida staff described how they ensure that they meet directly with LNA representatives when they undertake field missions wherever access permitted, elsewhere LNAs expressed frustration that their attempts to communicate with Sida went unanswered. In DRC, one LNA noted "Our international partners never told us what localisation is on Sida perspective. We have attempted reaching out to the Sweden Embassy in Kinshasa to inquire further on their funding mechanism and they always ask us to refer to the DRC Humanitarian Fund".

7 Localisation dimension six: Knowledge

Section overview and summary

Global efforts to shift power to local and national actors have highlighted the important role that knowledge generation plays in this – both imbalances in who controls the evidence economy (Barguios, 2019; Bian, 2022) and gaps in knowledge about the extent and effects of localisation (ALNAP, 2023). Globally, there is a growing body of research and evidence on localisation. However, the emphasis tends to be on progress towards high-level commitments, such as those within the Grand Bargain, and is mainly from the perspective of international actors (Humanitarian Leadership Academy, 2019; Barbelet, et al., 2021). Overall, there is less investment in generating evidence regarding the impact of locally driven humanitarian action or the effectiveness and efficiency of locally-led approaches, and what evidence exists is largely anecdotal (International Rescue Committee, 2019; Barbelet, et al., 2021).

So, although commitments on knowledge generation are not explicitly included in the Grand Bargain or subsequent measurement frameworks, it is a dimension which is judged important by many stakeholders to advance localisation. This section therefore looks at the two aspects of knowledge generation in relation to localisation: first the degree to which Sweden supports global knowledge generation on localisation; and secondly its support for locally generated knowledge and evidence. Its key findings are:

- Sida supports knowledge and evidence on localisation-related topics, though its approach is piecemeal, with few links between the different projects and units providing support.

- The Sida strategy for cooperation in research for development emphasises local ownership of the research agenda, equal partnership with local researchers and strengthening locally anchored knowledge systems, but this is not mainstream in its humanitarian approach.

- The evaluation found some evidence of humanitarian-funded interventions by Sida that embodied these principles, but not in the country case-studies, where examples of Sida's support for localised research in humanitarian settings were limited to non-existent, despite a clear appetite for more localised evidence generation.

7.1 Evidence: has Sweden supported knowledge generation about localisation?

Sweden is not perceived, either internally or externally, to prioritise evidence generation on localisation. In interviews at both global and country level, few stakeholders offered examples of Swedish-supported initiatives to generate or disseminate knowledge and evidence on localisation. Similarly, in the online survey, only 27 percent of those who participated selected this option, making it the lowest perceived priority.

There were exceptions, including organisations specifically dedicated to research and knowledge generation who receive funding from Sida's Unit for Humanitarian Assistance. This includes Ground Truth Solutions, whose research involves hearing directly from people affected by crises on a range of issues, including on the extent to which emergency responses had been locally led. Sida's support for ODI has also supported the organisation to conduct research on a range of themes, including locally led humanitarian action.

The evaluation also found other examples of Sida-supported research on localisation within broader programmes of work – including, for example, work by the International Rescue Committee on localising protection analysis capacity and another by FAO on sharing learning from working with LNAs to strengthen food security and agricultural resilience (both initiatives are now completed or discontinued) – but these efforts tended to be driven by the organisations themselves with little direct involvement from Sida.

Sida's Unit for Research Cooperation does not commission research, but it has supported academic and research organisations in the 'global south' to pursue their own research agendas, including work on topics relevant to localisation. Interviewees also pointed to examples of Sida's support for the generation of localisation-relevant evidence from non-humanitarian budgets. Support for research generation on civil society strengthening from Sida's CIVSAM Unit was noted, as well as research commissioned by Sida's Democracy and Human Rights Unit.

The examples demonstrate that Sida does support knowledge and evidence on localisation-related topics. Its approach is piecemeal, however, with few links between the different Sida units providing support. This made it difficult to get an overview of Sida's support for the generation of knowledge on localisation as a coherent body of research and has likely compromised its ability to capitalise and promote the uptake of its own investments in localisation-relevant knowledge and evidence.

7.2 Origin: to what extent has Sweden supported locally generated research?

The majority of internationally funded research on localisation is led by and attributed to international experts and organisations, including existing research cited in this evaluation. The same power imbalances play out in humanitarian research as they do in

humanitarian programming. While local researchers and organisations are often involved in the research, and local communities are frequently consulted, local actors are not considered to be driving the agenda – local expertise is devalued and local researchers are relegated to 'data collectors' who are overlooked in authorship credits and in design and roll-out of research plans (Robillard et al., 2020; Barbelet, V. et al., 2021).

That said, Sida's strategy for cooperation in research for development (Sida, 2022a) puts a strong emphasis on local ownership of the research agenda, equal partnership with local researchers and strengthening locally anchored knowledge systems. In practice, this has meant Swedish support for initiatives such as the 'Scholars at Risk Network', which protects threatened scholars and strengthens universities in insecure environments [37], and bilateral support for universities in less developed countries around the world as a contribution to their own capacity development and research agendas.

The evaluation found some evidence of initiatives supported by Sida's humanitarian funds that embodied these principles of local ownership, and that Sweden could build on and learn from. For example, The New Humanitarian (TNH), supported by Sida and other donors, has made significant investments in order to work more closely with local contributors. Within its strategy of 'decolonising our journalism', TNH had increased its reporting from national of countries they were reporting on from 25 percent of its total content in 2021 to 41 percent in 2022. In addition, TNH has sought to challenge traditional narratives on power and accountability in the aid sector – moving away from victim-centric stories to highlight examples of local citizens pushing for progress themselves. They also increased their publication of translated articles (from two to four per month) to reach local audiences in their own languages and produced more formats that do not require a strong command of English (The New Humanitarian, 2023).

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[37] See: https://www.scholarsatrisk.org/

There were other examples among Sida's programmatic humanitarian partners of work they had done to localise ownership of humanitarian knowledge. One organisation that we interviewed described how instead of "taking an extractive approach to information from communities", passing it upwards to international humanitarian organisations only, they had "partnered with local civil society so they can make sense of the data, use it and own it and take it further". In Ethiopia, the World Food Programme reported that it had worked with local universities on joint data collection, analysis and research on relief and nutrition activities (World Food Programme, 2023); and in Niger, it had partnered with universities and worked directly with university students to improve the quality of its resilience programming (World Food Programme, 2023a).

There was, however, limited evidence from the country level case-studies of Sida's support for localised research in humanitarian settings. Interviews with country-based stakeholders and county-specific literature highlighted an appetite for more localised evidence generation but offered few concrete examples of such approaches in practice – suggesting that Sweden could be doing considerably more to make this a mainstay of its global approach to humanitarian evidence.

Box 16: Country perspectives on localised research and knowledge generation

In DRC, interviewees indicated that localising knowledge production was not considered a priority during emergencies and the "short duration of grants generally did not allow research development"; rather the focus is generally on monitoring, evaluation and learning to learn from emergency response.

In Afghanistan, the literature recognises that more research about localisation is needed from the perspective of local civil society, as well as more critical explorations of what localisation in Afghanistan could look like moving forward (ACAPS, 2023).

In Yemen, there is little international attention to locally generated knowledge, and information exchange between NNGOs is hampered by an environment of constraint and mistrust (Tandeem Youth Foundation, 2022).

8   Conclusions and recommendations

Seven years on from signing up to the Grand Bargain, Sweden is at a crossroads in its approach to localisation. There is significant internal appetite and momentum, as well as external demand for Sweden to apply its commitments with a new level of seriousness and profile. But to do so, it faces some important choices to change the status quo in how power and resources are shared between international actors and their local and national equals. None of these choices are unique to Sweden, but they will need to be addressed in ways that makes sense for its particular institutional ways of working and precepts. Doing so in an honest and consultative way will not only bring clarity and open up pathways for Sweden but will also help the humanitarian wider community of donors and agencies to navigate their own pathways to localisation.

Emerging from all the six dimensions of localisation that we evaluated, are a series of recurrent themes which suggest a set of recommendations for action by Sweden. As these themes cut across the six dimensions, we group them together here under seven common areas that Sweden should consider if it is to unlock substantive change – four areas of normative shift and three areas of practical effort. The recommendations are also presented separately in a table in annex 1.

The four normative areas on which Sweden will need to clarify its position are how to:

- conceive and communicate localisation as a priority;
- balance flexibility with assertiveness to drive change;
- adapt its approach to risk management; and
- improve the sustainability of support to LNAs.

Each of these normative questions go to the heart of Sweden's identity as a donor and will demand institution-wide engagement, as these are strategic and political questions – not just technical problems. However, realising change in these four normative areas will also involve action in three more practical areas:

* leveraging external influence
* enhancing internal coherence
* investing for effectiveness.

All the following seven areas of normative or practical action set out in the following sections require a will for change at all levels from the political to the technical. Few of the recommendations we identify are new in the localisation debate. Indeed, during our research we encountered fatigue and scepticism, including from LNAs, that the international system had to keep repeating the same 'lessons' without learning them. In DRC for example, LNA representatives lamented that donors and international agencies appeared to have learned little from the local response to the Ebola and Covid emergencies and attributed this stasis to engrained resistance against shifting a status quo that benefitted international actors. Countering this fatigue and challenging any resistance will therefore require coherent ambition and concerted effort from Sweden.

8.1 Normative shifts

Prioritising localisation

Implicit in Sweden's humanitarian approach as a principled, needs-based donor is that it supports the 'best placed actor' to deliver effective response. In many cases this is compatible with supporting LNAs – but this is not automatically the case. Localisation is strategically for Sweden a means to the end of improving life-saving

effectiveness, particularly in hard-to-reach areas (MFA, 2020). This begs two questions for Sweden – one of clarity and one of priority. In terms of clarity, while Sweden has robust criteria for evaluating its partners suitability and effectiveness, what constitutes 'best placed' is not explicitly articulated and therefore runs the risk of mirroring established partnership preferences. In terms of priority, viewing LNAs through an instrumental lens of increased access, risks a reductive view of their role and arguably limits the scope of ambition for system transformation.

Options are available to Sweden to better signal that it considers advancing localisation as an important objective, without compromising its primary principles of delivering humanitarian support in the most effective way. Normatively, it can follow the example of the CBPFs, in setting localisation as a clear secondary priority. In terms of operational guidance, this can be accompanied with an explicit articulation of what constitutes 'best placed', which both sets out the value of LNAs in terms that go beyond access, and also the role of internationals, both as intermediaries and direct implementers where necessary. As we have seen in the 'capacity strengthening' section, this would enable a view of what Sweden and its SPOs can learn from the expertise of LNAs, not just what they can teach them.

This clear strategic prioritisation of localisation would then open the path for continued efforts to support localisation, scaling up the pilots that Sida is pursuing at time of writing to represent a greater and potentially more transformative share of Swedish humanitarian assistance. This would involve investments to support LNAs to be more widely recognised and enabled to be 'best placed', both through more through and open identification of potential partners and through more targeted support (see section 8.2).

Recommendations

1. Sida is in the process of drafting and finalising a policy brief and accompanying technical guidance on locally led humanitarian action. The roll out of this position and tools should be maximised to signal localisation as a non-negotiable strategic priority across the diverse range of humanitarian contexts in which Sweden works – and across all the Swedish government institutions and offices engaged in administering aid in these contexts.

2. Localisation is currently just one consideration among many within Sida's humanitarian portfolio. In addition to the stand-alone policy brief and guidance on localisation, Sweden's next four-year humanitarian strategy should clearly highlight localisation as a priority in and of itself, secondary to the primary life-saving priority. To create the foundations for this, Sweden can develop a clear position of how it understands 'best placed actor' in a way that supports active inclusion of LNAs.

3. Sida can also ensure that supporting local actors and promoting local leadership is routinely built into the Humanitarian Country Analysis (HCA) process, which forms the basis of its annual allocations. This would signal the operational centrality of localisation – and done robustly, could incentivise and use analytical mapping of local and national response capacity.

Balancing flexibility with assertiveness

Sweden is prized and prides itself on being a flexible donor. We heard arguments that this is not only a quality of good humanitarian donorship, but that it also frees up budgets to invest in localisation. But leveraging Sweden's power to incentivise substantial transformation will require it to be more explicit about what it expects from its partners and to set specific ambitions for them to fulfil. As we have seen, there is a growing call from many sources for Sweden to be clearer in this regard, and there is both support and latitude for it to be 'bolder' in what it asks of its SPOs. Shifting away

from a position where sharing resources and power with LNAs is discretionary for SPOs is seen to be necessary if localisation is to be meaningfully realised. As one respondent noted: "I think the main barriers are systemic. And us being complicit because there's not much by way of tangible, enforceable commitment to hold us to account. The localisation agenda seems to be chugging along a kind of a trickle-down trajectory where the UN and INGOs are supposed to take less space of their own accord and thus open up the space for LNGOs to assume their rightful space as first responders. As long as we rely on goodwill for change to happen it will be too slow and too little, because it doesn't disrupt sufficiently the way the system is biased."

There is a balance that Sweden will need to strike in this regard – our research found no appetite for it to abandon its flexibility, and a consensus that becoming a more 'micro-managing' donor would be a backward step to the detriment of all. However, there was a widespread sense that it was feasible for Sweden to achieve such a balance. It is important to recognise that Sweden has many of the tools and opportunities for requiring localisation action, already built into its processes. Sweden may be seen as a relatively hands-off donor, but it still has robust requirements for partner selection and reporting. As we have seen in the funding section, these span the partner relationship from assessment and agreement through to regular reporting and partner dialogue cycle. We also heard that Sida actively requests funding data from many of its partners.

However, the evidence suggests that follow-up on these existing localisation requirements is not consistent between Swedish officials, nor comprehensive to cover all dimensions of localisation, nor is it sustained over the lifespan of the partnership. As a result, Sweden does not have a clear picture of how much of its humanitarian funding reaches LNAs, nor the extent to which its partners are already contributing to more locally led humanitarian action. LNAs working through intermediary organisations are also often unaware that they are receiving Swedish funding – some local and national NGOs were only made aware through this evaluation.

The issue for Sweden is then about how to ensure that these requirements are consistently applied. This will be especially important in regard to the large established partners, particularly the UN agencies that receive significant funds from both Sida and the MFA and where concerns about onerous and unequal partnerships have long been raised (see Stoddard et al., 2017). Several SPOs told us that such routine requirements would not only help to provide a stronger and more transparent evidence base on localisation but would also incentivise their own organisations to share resources more consistently with local partners and increase their visibility.

In some areas, this needs to go hand in hand with a clearer indication from Sweden of what the benchmarks for good localisation look like – beyond an increase in funding. For certain aspects this could be quite specific, particularly around sharing of overheads, where there is both precedent from other donors and appetite from SPOs and LNAs, and where Sida is laying the groundwork for policy through its pilot with Oxfam. In other areas, such as equality of partnership, capacity-strengthening and visibility, there is scope to set norms rather than detailed prescriptions – and there are existing localisation indicators established by other agencies and networks, following the Grand Bargain agreement, which can provide a framework for this. Consistent monitoring and dialogue on application of localisation by SPOs is also not mutually exclusive with adaptive application – frameworks and dialogue can account for the reality that there may be contexts, responses and organisations for which limited progress against conventional localisation metrics is possible.

Recommendations

1. Sida should more proactively and consistently apply its existing guidelines to vet proposals and monitor the progress of its international partners. Those organisations that demonstrate their commitments to localisation in practical and transparent ways, may be looked on more favourably for continued funding.

The MFA can work with UN agencies to model the same approach, incentivising them to do more on localisation with the core funding that they receive.

2. Sharing of overhead costs is an important priority, to ensure that local partners have the resources they need to sustain and improve their institutional capacity. Adopting a target percentage rate of between 7–12 percent (ideally 10 percent to align with good practice modelled by the US) for local actors' overhead costs within country programme budgets, would send an important signal to Sida's international NGO partners and provide a means of monitoring progress over time.

3. MFA (with Sida's support) should advocate within the various governance bodies of its UN partners for consistent and fair overheads for downstream partners, using the same target rate of between 7–12 percent. Sweden can anticipate that additional funding for UN agencies may be required, given that this spending will generally be reported as direct programme costs rather than shared indirect costs.

Adapting risk management

Humanitarian aid is by definition risky – it necessitates working in the most volatile and fragile contexts in the world. It involves highly principled actors making fraught daily compromises about applying those principles in severely constrained and politicised situations (ALNAP, 2022). Yet even in these contexts, Sweden has the responsibility to manage risks around the use of its public funds – taking particular care to ensure that its partners comply with financial and legal regulations and that they do not pose undue operational, ethical, and reputational risks.

However, the thresholds for compliance from Sweden and many other donors make direct funding of many LNAs unfeasible, and disincentivise indirect funding from intermediaries who fear finding themselves in a 'risk sandwich'. Our research has highlighted

instances of SPOs either avoiding partnering with LNAs for fear of being exposed to their risks, or of establishing compliance demands on LNAs that are even more stringent than those of the donors, to protect themselves. There was a widespread sense of tension between the localisation ambitions promoted by Sida's Unit for Humanitarian Assistance and the regulatory technicalities required by its audit and control functions. In some cases, the limits that this imposed on working with LNAs were definite. In others, uncertainty about latitude in regulations led SPOs to take the 'safe' option. Sweden therefore has to face the challenge of maintaining robust oversight of public funds and associated activities, while reconceiving or adapting risk management in a way that is compatible with localisation.

Fiduciary risk management remains the main preoccupation for Sweden and its SPOs, and a major barrier to entry for LNAs. In the first instance, there is scope for Sweden's programme and partner facing staff to work together with its audit and control staff. Together they could provide much greater clarity to SPOs on the available latitude to accommodate apparent irregularities arising in partnership with LNAs. This would go some way to mitigating the 'destructive risk avoidance' that arises from uncertainty. It can also go hand-in-hand with review and dialogue with SPOs of their own compliance measures with partners to ensure that these are not heavier than those required by donors. As we note below (see section 8.2), this will demand continued efforts to harmonise standards and procedures among donors and among agencies – and continued investment, as we have seen with the Pooled Funds, to support LNAs to understand, navigate and meet these standards.

Where Sweden's risk management expectations are at odds with enabling support to LNAs, there is a need for a deeper conversation with those responsible for audit and control about finding feasible alternative models and adaptations. There is precedent for this flexibility, as we have seen with the exclusion or standardised counter-terrorism clauses from partnership agreements with

humanitarian partners. Sida's current pilot projects for direct funding to LNAs also provide the space for experimenting with alternative arrangements that are still within the limits of acceptable risk, such as funding locally led intermediary actors. It can also learn from the efforts of other donors, for example in supporting locally led pooled funds.

However, all this attention to mitigating the barriers posed by fiduciary compliance has to be set against a wider reflection of whether the balance of risk-sharing between donors, international agencies and LNAs is fair. Sweden has to ask itself and its partners whether their management frameworks consider 'risks to' LNAs as much as 'risks of' them. This is particularly the case around the security risks that LNAs are exposed to, which are rarely given the same level of attention as the financial and legal compliance that is expected of them. Given that Sweden's strategic rationale for localisation rests on LNAs ability to reach the most difficult places, this should be a particular focus of an ethical approach to localisation. This will involve comprehensive risk management that raises co-ownership of risk early in the partnership, promotes co-development risk management plans with LNAs, and allows and encourages sufficient budget to put in place mitigation measures.

Recommendations

1. Within Sida, more dialogue between the Unit for Humanitarian Assistance and compliance sections is needed to identify where the bottlenecks are in terms of providing more support to LNAs and begin identifying solutions. Flexibility to align compliance requirements with the size of the grant requested and working with other donors to align risk assessment procedures, should be considered. If Sida is unable to compromise on certain aspects, such as audit requirements, then providing dedicated, adequate funding for LNAs to comply (and/or the intermediary organisations working with them) should be provided.

2. Sida and MFA should request international partners to show how security risks for local and national partners are addressed, including through supporting the co-development of joint risk management frameworks. This needs to be accompanied by sufficient funding from Sweden to support security risk management, as well as ongoing dialogue with SPOs and LNAs about the perceived and actual risks.

Improving sustainability

The focus of Sweden's humanitarian assistance is emergency support and life-saving measures. Its annual HCA model has been developed to manage finite humanitarian funds in a way that is responsive to changes in where the most severe needs are. However, shifting to a localised approach requires more sustained investments and engagement to build and support effective partnerships. This suggests a basic tension in priorities and timeframes.

However, multi-year agreements are in fact a staple part of Sweden's humanitarian agreements – these offer many of its SPOs the predictability and flexibility both to adapt to changes in needs and to invest in the ongoing capacities and running costs required to meet them. As we have seen, around 80 percent of the MFA's core funds to UN agencies and ICRC is multi-year, and around 20 percent of Sida's humanitarian allocations are longer-term. Our findings show that the benefits of this could be more consistently passed on to LNAs and better harnessed to support localisation. The fact that most indirect funding to LNAs was at the very most annual compromised their ability to invest in their institutions, retain staff, and by placing them in financial precarity led them to take on risky, unstrategic and inequitable sub-contracts.

Making the most of Sweden's multi-year approach to further localisation will require encouraging and incentivising its SPOs to pass on the benefits of multi-year funding to their LNA partners. The practice of UN agencies will need to be a particular focus, given

that the bulk of Sweden's multi-year support is channelled to them. At the same time, the CBPFs are seen by Sweden as a primary modality for indirect support to LNAs, but (with exceptions) these are not the subject of multi-year agreements, instead having their allocations reviewed annually under the HCAs. As they largely cover protracted crises, there are calls by several CBPFs for Sweden to provide the degree of multi-year predictability that would enable them to provide sustained support to LNAs. Working with SPOs to pass on multi-year funding should be part of a wider discussion with SPOs and LNAs about what sustainable support looks like – this involves refraining from practices that undermine LNAs' future, with staff 'poaching' being a particular concern.

A truly sustained approach to localisation requires connections with longer term development and civil society strengthening efforts. As the literature reiterates, most LNAs are part of civil society and only classify themselves as humanitarian or development when they encounter the international system. On the part of Sweden, our research has revealed many good intentions, much good country practice and multiple opportunities to draw connections between their humanitarian and longer-term investments – but it also found systematic disconnects and failures to consolidate learning instead of 'reinventing the wheel'. There is evident scope for Sweden's localisation and nexus efforts to be more strategically and practically aligned – learning from and replicating the good practice we saw in Palestine. But this raises a bigger question of whether and how Sweden's future development cooperation strategy will support this – whether civil society strengthening will continue to be a focus for investment and whether development cooperation will be sufficiently directed to addressing the drivers and consequences of need in fragile and crisis-affected countries, including through support to local civil society organisations.

Recommendations

1. While there are no restrictions on passing on multi-year funding from Sida or MFA to local and national partners, international intermediaries are not necessarily incentivised to do so. Sida and MFA should clearly articulate – within partnership guidelines and through the partnership dialogue cycle – their expectations that longer-term funding is shared with LNAs, and partners should be held to account for doing so.

2. Where feasible and appropriate, multi-year funding for CBPFs should be approved. A review of Sida funding for CBPFs would help to identify contexts in which longer-term funding would be a) particularly valuable for supporting the capacity building of local and national NGOs; and b) feasible i.e. where annual humanitarian funding has already been provided for several consecutive years and geographic priorities are unlikely to change.

8.2 Practical efforts

Leveraging Sweden's influence

Sweden is a well-regarded and influential donor but it is not currently using its voice and platforms to advance localisation. As one of the top ten humanitarian donors, with a seat at all the important policy coordination and governance tables, it has a significant amount of 'soft power' in the humanitarian sphere as a key player in establishing principles of good humanitarian donorship, as well as advancing the Grand Bargain. It has both the authority and the platforms to be a leading voice on localisation. As we have seen, there is an expectation for Sweden to use this position to be more vocal – and there is widespread disappointment that it has not. While Sweden has demonstrated its capacity for leadership in some cases, there is demand for this to be more consistent – strategically driven rather than reliant on individuals.

Using its position on the advisory boards of UN agencies and pooled funds will demand a new level of engagement from the MFA on localisation and a strengthening of its working relationship with Sida – supported by signals of support from the highest levels in the ministry. This will enable it to work to greatest effect as part of a collective approach with other donors to align approaches, harmonise requirements, and test new ways to incentivise system change. As well as supporting broad priorities on localisation, Sweden can also find its niche on issues that align with its particular expertise and experience – for example on overheads, which connects to its established interest in quality funding and its investment in pilots. As it finds its voice on localisation in policy and decision-making fora, it can also use the opportunity to elevate the voices of LNAs, creating support and space for their meaningful engagement.

Recommendations

1. Sida and the MFA should work together to identify and use existing opportunities to increase its visibility in global fora and leverage its position as a leading humanitarian donor to push the pace of change on localisation. The Grand Bargain provides a ready-made forum to showcase Sweden's prioritisation of localisation and there are many other groups, including the Good Humanitarian Donorship group at the global level, the Pooled Fund Advisory boards and humanitarian donor groups in different crisis contexts, where Sweden can more boldly signal its intentions on localisation and encourage others to do likewise, and promote active engagement of LNAs in these fora.

2. Sweden can also create new opportunities for external influence on the basis of its current learning and action on localisation. Proactively sharing the findings of this evaluation and consulting with other donors and organisations on follow-up actions will likely generate discussion and motivate others to follow suit. Sida's forthcoming policy brief on localisation, while aimed at an

internal audience, is another opportunity to signal to an external audience its seriousness about making change. Using these opportunities to give LNAs voice, visibility and access to decision-makers, will provide leadership by example.

Improving internal coordination

Speaking up and working effectively externally demands being on the same page internally – but as we have seen, there are missed opportunities for linkages between and within Swedish institutions – despite the fact that many of these are involved in supporting the same organisations. Our research has revealed disconnects in all directions: between country and HQ levels, between MFA and Sida, and between units within Sida – including between the regional development cooperation teams, the Unit for Humanitarian Assistance and CIVSAM. It is telling that the Localisation Task Team, which is a laudable initiative, only comprises staff from Sida's Unit for Humanitarian Assistance.

Creating opportunities for a more joined-up 'team Sweden' approach to localisation is important for a concerted approach to influencing and incentivising the policy and practice of its largest SPOs. But it extends beyond this – humanitarian action is increasingly taking place in contexts of rising autocracy, shrinking civil society space, and active conflict. Here, the barriers to supporting LNAs to lead response are political as much as they are operational or technical. Understanding how LNAs are positioned in highly politicised spaces and securing the space to support civil society organisations directly and indirectly may demand engagement from Sweden's political and diplomatic arms, as part of wider efforts to maintain principled humanitarian space.

Recommendations

1. Expansion of the Localisation Task Team – or creating a Localisation Task Team 'plus', with participation beyond the Unit for Humanitarian Assistance – would help to create synergies with other Units in Sida, such as CIVSAM on capacity strengthening of local and national NGOs, the Research Unit with its emphasis on local ownership of research agendas, and other development and nexus-focused units. Agreeing a clear terms of reference, work plan and finite timeframe for the Task Team would ensure that its work is focused and timely and encourages longer-term collective action to strengthen Sweden's contribution to localisation.

2. A strategic discussion on localisation between Sida and MFA must be demanded and facilitated from the highest levels. This could generate a joint roadmap for advancing progress on localisation – including plans to harmonise their respective dialogues with UN partners to incentivise progress on localisation, and agreement on how external opportunities and platforms can be used to promote expectations and unblock action.

Investing for change

One argument among some donors for supporting localisation is that it is potentially cheaper – LNAs have lower running costs than large international institutions, and funding them more directly cuts out layers of transaction costs. Indeed, some projections have suggested cost savings of a scale that would significantly plug the global humanitarian financing gap (Cabot Venton et al., 2022). This can be an important part of using Sweden's finite resources wisely and shaping a humanitarian system that is more efficient and effective to meet changing and rising needs under growing financial strictures.

This however should not be the primary aim of localisation efforts, and although cost-savings may transpire to be a welcome by-product – they need to be pursued with the understanding that investments are also required, particularly in the short- to medium-term as

partnerships and new ways of working are established. At the same time as scaling up pilots for direct funding, Sweden will need to ensure that SPOs have the requisite funds to support LNAs, including for security risk management and capacity strengthening.

This evaluation does not underestimate the difficult task of allocating adequate human resources within Sida and MFA to support progress on localisation. According to interviewees, it comes at a time when funding is particularly tight and staffing more stretched than ever. Given that human resource constraints were seen as a major barrier to localisation, this necessitates thinking seriously about what configuration of staffing and support it takes to foster relationships with local actors – including when staff are outside the country and there is a high rate of staff turnover. An honest review of resources needed to scale-up Sweden's direct and indirect support to LNAs is required, which is outside the scope of this research. Such a review will need to draw on experience from other donors indicating the necessary investments in staff time to develop and roll-out guidance and change working cultures, as well as to cultivate and manage new types of partnerships.

Recommendations

1. The pace of work on piloting of direct Sida funding to local and national NGOs needs to accelerate. Pilots might include support for local actors to conduct research and generate evidence on localisation and other topics. Active and learning from the pilots can inform a timely and meaningful scale-up in pilot contexts and elsewhere. Beyond the pilots, budgets need to be identified and secured to adequate resource Sweden's intermediary partners to step up their efforts with local and national actors.

2. Drawing on learning from other donors, Sweden needs to undertake a clear-eyed review of human resources availability and requirements across its departments, country teams and institutions, and make adjustments to more effectively support localisation.

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Appendix 1: Methodology

Theoretical framework

The Theoretical Framework (see figure A1 below) for this evaluation was developed by the team as part of the inception phase of the research. It drew on the provisions of the Grand Bargain commitment and a number of established localisation measurement frameworks (see Featherstone, 2019; Van Brabant and Patel, 2018; HAG and PIANGO, 2019), and adapted these to the research questions set out in the ToR for this evaluation. The draft framework was reviewed by the evaluation's Reference Group and iterated on the basis of inception interviews. Once finalised, the Theoretical Framework was translated into the detailed areas of enquiry detailed in the evaluation matrix (see table 4 below) – which then formed the basis of the suite of research and analysis tools developed and used by the team.

Document and literature review

The evaluation team conducted a thorough review of key documentation to inform the inception phase and to refine the evaluation design and tools. A more detailed documentation gathering and review process was conducted at a global and country level during the full research stage, including the types of sources listed in box A1 below.

Box A1: Types of key documents and literature

- Internal MFA and Sida policy and process documents. Other evaluations and reviews of Sweden's humanitarian assistance.

- Project/programme proposals and annual reports to Sida from its SPOs, where available on request under government freedom of information provisions.

- External evaluations/reviews of Sweden's main humanitarian partners and recipients of funding – UN agencies and NGOs – with references to localisation/partnerships with local and national actors.

- Evaluations, reviews and guidance on pooled funds to which Sweden is a key donor: CERF and CBPFs

- Progress reports, reviews and frameworks on multi-stakeholder processes related to localisation e.g. The Grand Bargain

- Country-specific documents for case-study countries.

The evaluation did not duplicate the literature study commissioned by the Dutch Ministry of Foreign Affairs and conducted by ODI (Barbelet et al., 2021). Rather, study used it as a starting point, which the team updated with more recent literature, and built on to deepen its understanding of the specific questions to be answered through this evaluation.

Quantitative data gathering and analysis

Quantitative data was provided by Sida and MFA on Sweden's humanitarian funding in 2020–2023. This was analysed alongside data reported to OCHA's Financial Tracking Service (FTS) both to select case study countries and to analyse trends in indirect funding relevant to localisation. In addition, the evaluation considered global data and analysis already conducted on localisation and other relevant themes, to situate Sweden's funding in the context of broader trends in relation to localisation.

Semi-structured Key Informant Interviews

A total of 185 individuals were interviewed in the course of KIIs for this study: 75 in global-level KIIs and 110 in country-level KIIs across eleven countries.

Box A2: categories of key informants

Global-level: Key decision-makers in MFA and Sida; other HQ donor representatives, particularly those engaged in localisation efforts within the Grand Bargain; HQ staff of UN agencies and NGOs in receipt of Swedish funding; OCHA staff managing pooled funds at global level – CERF and CBPFs; thought leaders in academia/think tanks on localisation.

Country-level: MFA and Sida representatives at country-level/Swedish missions abroad; UN and NGO staff in receipt of Swedish funding; pooled fund managers at country-level and other OCHA staff, other donor representatives; staff of LNAs working in partnership with Swedish grantees.

Online survey

The survey conducted between May and August 2023 received 146 respondents (see Annex 1 for details), reaching a wider set of key informants beyond KIIs and case-studies countries. It targeted direct and indirect recipients of Swedish humanitarian funding, with emphasis on LNAs. The survey data supplemented data gathered through other methods, complementing qualitative analysis with quantitative results from a more expansive set of key stakeholders.

Country case-studies

The evaluation used a two-tier country case-study approach: light touch and deep-dive case studies to generate evidence on the results of Sweden's humanitarian support:

Eight light touch case studies (Afghanistan, Bangladesh, Ethiopia, South Sudan, Palestine, Syria, Yemen and Somalia) were conducted remotely by the global research team. This involved a small sample of KIIs with the Sida country leads for these countries; the embassy/consulate lead on humanitarian issues; up to four of the largest recipient organisations of Swedish humanitarian funding in country; senior CBPF staff; and representatives of LNA platforms where available. Key policy, context and programme literature was also reviewed.

Three deep dive case studies (DRC, Myanmar and Ukraine) were conducted in-country by national researchers. These involved a more in-depth and broader range of KIIs, in particular: country representatives of all MFA grantees and Sida SPOs, and importantly the LNA partners of those intermediary organisations.

The selection of countries for these deep and light-touch case studies was guided by analysis of the size of Sweden's humanitarian allocation to the country, and represented: geographic spread; crisis type and duration; political environment (i.e. civil society and humanitarian space); the number of direct Sweden's INGOs and UN partners'; the presence of CBPFs; and the existence of the Sida localisation pilots.

Analysis and sense-making

In addition to a multi-stage process of data analysis, synthesis and checking between the team members, at the end of the data analysis stage of the analysis, the team convened a workshop in Stockholm to present and interrogate the emerging findings prior to write-up. This involved the full research team as well as representatives from EBA, Sida, and Swedish embassies.

Supported and facilitated by EBA, the study's Reference Group provided timely inputs and steered the evaluation throughout the process, including a review of the full report.

Research ethics

Given the need for confidentially in interviews and the respect for the rights of stakeholders, verbal consent was sought before the interviews. The key informant received an email attachment with the consent form to read ahead of the interview and this was repeated verbally at the start of interviews. Given that most key informants were professionals and partners of Sida/MFA, the importance of voluntary participation was emphasised. Participants were reassured that the information they provide would not way affect their relationship and partnership with Sida/MFA.

Data collected were kept confidential, anonymously recorded and only accessible to the study team. Limitations and assumptions There were several limitations and assumptions implicit in the subject and scope of this evaluation. Several of these were addressed in the section above on terminology and as set out in Table A1 below:

Table A1: Limitations and assumptions

Limitation/assumption	Mitigation
Community engagement The team considered that direct research with affected communities was neither necessary for the scope of the enquiry, nor ethical in terms of the demand that it would place on their time.	Primary data-gathering from affected communities was not featured in the research methodology. Existing secondary research, including perception surveys, was used as a source of evidence.

Limitation/assumption	Mitigation
Language bias Language is often a barrier to localisation, and terminology often get 'lost in translation'.	National researchers were proficient in multiple local languages, global researchers were proficient in English and French. Wherever possible, surveys, questionnaires and consent forms were translated using the most cost-effective but accurate software.
Research team bias Two members of the research team were based in the Global North. While they had extensive experience of living and working in other countries, they were conscious that their framing – and that of the EBA – could bring a specific framing and perspective.	The team was intentionally formed to be weighted towards researchers who originated from and were living in countries experiencing humanitarian responses. Five out of seven were, in this sense, local or national. Central to the research team's ethos was collaborative working with the aim of maintaining equality across the process, alongside a clear division of labour. Throughout the process, we tested our framework and hypotheses for bias and brought together a diverse reference group to challenge bias in the quality assurance process.
Generalisability of findings This report sought to draw overall conclusions and recommendations about Sweden's performance as a global donor. However, the literature was clear that localisation is highly context-specific – so there were limits to the generalisability of findings between contexts.	AS noted above, countries for case studies were selected to represent as wide a range of crises and context types as possible. Emergent hypotheses were also tested between contexts to understand the factors driving differences. Evaluation findings were illustrated with evidence from different country case-studies as far as possible, highlighting those differences, and singling out outliers and exceptions in the process.

Limitation/assumption	Mitigation
Attribution to Sweden The fact that Sweden's contribution to localisation is primarily delivered via its international strategic partners, makes it challenging to isolate Sweden's role in making progress on localisation.	Sweden's influence was more obvious in some thematic areas – such as within 'funding' – than in others. Where attribution was less clear, the team sought additional sources to test the connections, and was clear in its analysis on the degree of reliability of causal connection to Sweden's efforts.
Measuring outcome and impact A lack of concrete evidence on outcomes, in the form of monitoring data or pre-existing research, remains a limitation of the research.	The evaluation team relied on the perceptions of different stakeholders to draw conclusions on the outcome and impact of Sweden's direct and indirect efforts. In addition, secondary sources where available were used to illustrate and suggest connections between efforts and outcomes.
Quality and transparency of data Transparent data on indirect Swedish humanitarian assistance to LNAs is not readily available. Secondary data (e.g. from UN OCHA's FTS) is incomplete.	The team made efforts to gather additional primary data from Sweden's international strategic partners. Although this amounted to an inconsistent and incomplete dataset it did yield illustrative findings. The estimate of how much of Sweden's humanitarian funding reaches LNAs is based on Sweden's own calculations and should be investigated further, beyond this evaluation.

Limitation/assumption	Mitigation
Timing of the evaluation in relation to real-time changes in Sweden's approach The evaluation was conducted concurrently with efforts by Sida to make progress on localisation. In particular, Sida's Localisation Task Team was active at the time of the evaluation and a Sida policy brief on locally led humanitarian action was in the process of being drafted and finalised.	Every effort was made to stay informed and to reflect those emerging and forthcoming initiatives within this report. However, it must be noted there may have been further changes in the time between the completion of this research and publication of this report.

Figure A1: Theoretical framework

Enabling and hindering factors

Illustrative factors include..

For donors:
- Bureaucratic/admin constraints, including economies of scale
- Risk appetite
- Legal constraints
- Political and economic interests

For intermediary organisations (UN/INGO):
- Institutional interests/willingness to shift the power dynamic
- Economic interests
- Peer, public, and donor pressure

For local and national organisations:
- Capacity constraints
- Access to funding
- Compliance requirements

Contextual factors:
- Shared understandings of the localisation agenda
- Role of the state in the crisis
- Relationship between state and: i) local/national non-state actors; and ii) international humanitarian actors
- Number, scale, complexity and severity of crises
- Insecurity, civil society space and access

EQ2

Grand Bargain enabling priorities

A critical mass of quality funding is reached that allows an effective and efficient response, ensuring visibility and accountability

Greater support is provided for the leadership, delivery and capacity of local responders in addressing humanitarian needs

Lessons Learned

EQ3: What lessons can be learned for future efforts to further the localisation agenda?
- Collective analysis and reflection on the extent to which efforts and interventions have led to desired results and ultimately contributed to the GB enabling priorities
- Consideration of the enabling and hindering factors and the extent to which Swedish funding and action has capitalized on opportunities and overcome barriers to advance localisation
- Identification of lessons to inform future efforts to further the localisation agenda, particularly for MFA, Sida and Swedish missions abroad, but also for other humanitarian actors

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Sweden's Results

EQ2: What results have these interventions led to and how can such outcomes be explained?

Strategy
- Perceptions of clarity regarding Sweden's internal understanding and external communications on localisation
- Evidence of clear policies, strategies and staff responsibilities on localisation on the part of Sweden
- Alignment of definitions, objectives and approaches to localisation between Sweden and its direct partners
- Perceptions of progress towards greater localisation on the part of Sweden and its direct grantees as a result of Swedish requirements, support and incentives

Partnerships
- Evidence and perceptions of more genuine and equitable partnerships that shift the power to local and national, state and non-state actors as a partial result of Swedish influence
- Perceptions of fuller and more influential involvement of crisis-affected people in what relief is provided to them and how has (as a higher-level result of localisation efforts) as a partial result of Swedish influence

Funding
- Evidence and perceptions of improvements in the quantity and quality of funding for local and national actors as a result of Swedish requirements, support and incentives

Influence
- Evidence and perceptions of the increased presence of local and national, state and non-state actors in national and international policy discussions, and greater visibility for their contributions to humanitarian action as a partial result of Swedish influence
- Evidence and perceptions of greater leadership, presence, influence and decision-making power of local and national, state and non-state actors in humanitarian leadership and coordination mechanisms as a partial result of Swedish influence

Capacity
- Perceptions of more effective support for strong and sustainable institutional capacities for local and national, state and non-state actors as a result of Swedish requirements, support and incentives

Knowledge production
- Evidence of uptake of Swedish-supported knowledge products on localisation, including those generated in the 'Global South'

Sweden's Efforts and Interventions

EQ1: What efforts and interventions have been undertaken by Sweden to implement and further the localisation agenda within its humanitarian work?

Strategy (direct*)
- Efforts to clarify Sweden's definition of and approach to localization
- Efforts to align Sweden's approach to localisation with other key actors

Influence (primarily indirect*)
- Support for the participation and networking of local and national, state and non-state actors in forums and groups at global and country levels

Funding (primarily indirect, some direct*)
- Efforts to increase the quantity of funding to local and national actors
- Efforts to improve the quality of funding to local and national actors

Knowledge production (direct and indirect*)
- Investments in global knowledge generation on localisation
- Support for evidence generated in the 'Global South'

Partnerships (primarily indirect*)
- Efforts and incentives to improve the overall quality of partnerships with local and national, state and non-state actors
- Efforts and incentives to promote more accountability to affected populations specifically within the localisation agenda

Capacity development (indirect*)
- Support for developing strong and sustainable institutional capacities of national and local actors, state and non-state actors

*Direct = within the immediate control of Sweden; indirect = not fully within Sweden's direct control/done primarily through intermediary organisations or through other actors

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Local and national actors are the first responders in humanitarian crises. They provide ongoing support, and they stay on when the international organisations leave. Yet they have been structurally marginalised by the international humanitarian system. This evaluation investigates how Sweden is living up to its promises about increased localisation.

Lokala och nationella organisationer och aktörer är först på plats vid humanitära kriser. De hjälper oförtröttligt, och de finns kvar när internationella organisationer lämnar. Trots det är de marginaliserade i det internationella humanitära systemet. Denna utvärdering undersöker hur Sverige lever upp till sina löften om ökad lokalisering.