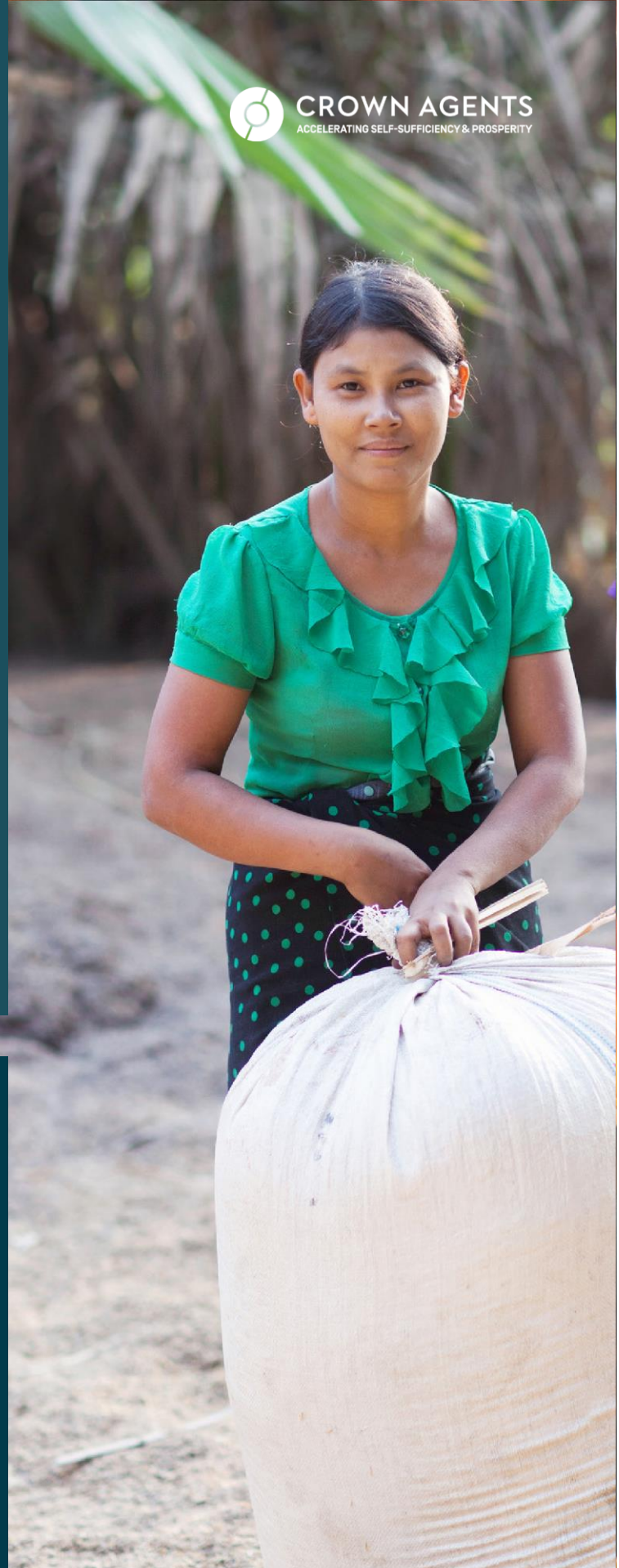


# LOCALISATION IN MYANMAR: SUPPORTING AND REINFORCING MYANMAR ACTORS TODAY AND TOMORROW

REVIEW

An independent review  
commissioned by the  
HARP Facility

Authored by the Global Mentoring  
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## Acronyms

AA:	Arakan Army
A2H:	Access to Health (country level pooled fund)
CASS:	Community Analysis Support System
CBO:	Community-based organisation
CDM:	Civil disobedience movement
COAR:	Center for Operational Analysis and Research
CPI:	Community Partners International
CSO:	Civil society organisation
DFID:	Department for International Development (UK government, predecessor to FCD0)
EAO:	Ethnic Armed Organisation
ESP:	Ethnic Service Providers – providers of essential services to civilian populations, under the auspices of an Ethnic Armed Organisation
FCD0:	Foreign, Commonwealth and Development Office (UK government)
FCM:	Feedback and complaints mechanism
HARP-F:	Humanitarian Assistance and Resilience Programme Facility
HUCOCA:	Humanitarian Country Capacity Analysis
ICR:	Internal Cost Recovery
HCT:	Humanitarian Country Team
ICRC:	International Committee of the Red Cross
IDP:	Internally Displaced Person
JST:	Joint Strategy Team (Kachin State)
KMSS:	Karuna Mission Social Solidarity
KNU:	Karen National Union
LIFT:	Livelihoods and Food Security Fund
LIS:	Local Insight Services
LP2:	Localisation Partnership Platform
MAM:	Medical Action Myanmar
MHAA:	Myanmar Health Assistant Association
MHF:	Myanmar Humanitarian Fund (country level pooled fund)
MLHN:	Myanmar Local Humanitarian Network
MPC:	Multi-purpose cash
NGCA:	Non-government-controlled areas
NLD:	National League for Democracy
NNGO:	National non-governmental organisation
NPAC:	Non-project Attributable Costs
NUCC:	National Unity Consultative Council
NUG:	National Unity Government
NRM:	Nexus Response Mechanism (country level fund)
OD:	Organisational development
PDF:	People's Defense Force
SAC:	State Administration Council
SCLR:	Survivor and community led response
SUN CSA:	Scaling Up Nutrition Civil Society Alliance
UNHCR:	United Nations High Commissioner for Refugees
WFP:	World Food Programme



## I. THIS REPORT

### 1. Purpose

This report explores the question of whether and how to support (further) localisation in the current conditions in Myanmar, which are assumed to remain similar for the next few years. It does this primarily from the perspective of international aid actors who, through their funding, hold much power over Myanmar actors. But it also speaks to what Myanmar actors need to do or do more of. The report addresses questions such as: What do we understand by 'localisation'? Why should we see this as an objective globally and in Myanmar specifically? What does it mean in practice, for example regarding funding, capacities, standards, risks, coordination, and political positioning? It provides recommendations for actions, based on clearer reflection on the why and how of localisation.

### 2. Target audience

Its target audience are all international and national/local actors responding to the crises in Myanmar today. This includes donors, the UN agencies, the Red Cross agencies, international NGOs (INGO) and the different Myanmar actors. Most international actors operating in Myanmar have formally subscribed to the Grand Bargain commitments. While focused on humanitarian action, their intention equally applies to development and peace actors. Turning these into practice is a collective responsibility.

### 3. Sources

The report draws on several sources: A '*state of localisation in Myanmar*' assessment, itself drawing on relevant documents and interviews conducted in late 2020<sup>1</sup>; a 2021 review of how the Humanitarian Assistance and Resilience Facility (HARP-F) put the localisation commitment into practice; other reviews commissioned and reflective webinars hosted by the HARP-F in 2021 and 2022; short conversations with other funding instruments that continue to operate in Myanmar, notably the Myanmar Humanitarian Fund (MHF), Access to Health (A2H); LIFT (Livelihood and Food Security Fund) and the Nexus Response Mechanism (NRM); earlier and other work by RAFT Myanmar and the Global Mentoring Initiative (GMI) in Myanmar; and GMI's involvement in global work on localisation and programming in volatile environments, and what is being learned from that.

### 4. Limitations and value

Due to the challenges of the current context in Myanmar, primary research for this study was conducted remotely. Shorter online interviews cannot substitute for observing meetings, actions in progress and being present to speak both formally and informally with many more people than those deemed 'key informants'. The report cannot have the in-depth and up-to-date insights that agencies operating in Myanmar will have. Its value lies in its comprehensive perspective on localisation and the connection with a wider learning that is relevant for it. Lack of a comprehensive perspective can be one impediment for more intentional and collective action to turn the localisation commitment into practice.

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<sup>1</sup> Commissioned by the ToTogether Consortium of four German NGOs (with Malteser International in the lead in Myanmar), which it is still in the process of publishing

## 5. Structure of the report

The second section provides a very summary picture of Myanmar as a protracted and currently deepening crisis. The third section situates the question of internationalisation or localisation at the strategic level and that of the collective of all responders. It appreciates the dilemmas all face in the current circumstances, and invites clarity about the why of localisation, what we mean with it, and what success would look like. Section four examines how localisation is or must be turned into practice in key areas: the quality of collaboration, financing, capacities, and coordination. Section 5 presents recommendations to international actors but also to Myanmar CSOs. The report offers a systematic structure of reflection useful for all actors – and illustrates many aspects with references to the HARP-F practices, in text boxes. Recommendations appear in sections 3, 4 and 5 following the issue-specific reflections and findings. They are grouped together in a separate ‘summary’ document. Several are relatively short term – as localisation has been extensively discussed and researched for years now, and the current challenging situation in Myanmar has existed for 15 months already.

## II. MYANMAR: A protracted and deepening crisis

Myanmar may be the longest running complex of conflicts in the world, contemporary conflict dynamics in the country having roots that go back to colonial times, and yet deeper into the past. (Thant Myint-U 2007). It is not a nation and no government since the creation of the contemporary country in 1948 has had full control over the territory as marked on current maps. Since 1962 the country has been ruled, virtually continuously, by the military. A brief opening, from 2010 to early 2021 looked like a ‘transition to democracy’. (see e.g. Thant Myint-U 2019) Many international actors operated on an assumption that the democratisation and development processes in Myanmar were irreversible.<sup>2</sup> The military overthrow, on 1 February 2021, of the government elected in November 2020, dashed those expectations.

The impacts so far have been dramatic and continue to deepen. A violent crackdown on both peaceful and armed opposition to the coup has worsened the physical security for many in Myanmar. People’s Defense Forces (PDF) are a new type of armed actor. (Ye Myo Hein & Meyers 2021). The number of internally displaced people (IDP) has increased rapidly. As of 28 February 2022, 873,000 people are displaced in Myanmar, including 502,600 people who have fled their homes since 1 February 2021 and 370,400 people from previous conflicts. (UN Myanmar 2022). So too the number of refugees, not only in Thailand and Bangladesh but also in India and China, where there is much less international support presence. COVID-19 was by no means under control by the time of the coup. Already weak medical infrastructure has weakened significantly since then, partly because of a lack of human resources as medical professionals have joined the Civil Disobedience Movement (CDM) in defiance of junta regime, and because vaccination rates are low. Over the past two years the economy has contracted, and inflation risen, leading to a wider spread of poverty, vulnerability, and food insecurity. (e.g. IFPRI 2021: LIFT 2021b:16) This is a human rights and humanitarian crisis. The political situation is highly polarised. There is less room for developmental and peace work. Amidst the central concentration on the struggle between the State Administration Council (SAC) and the many who oppose it, ongoing infighting between armed opposition groups receives little attention. (e.g. Mathieson 2021) The illicit economy is undoubtedly thriving. Insecurity, instability and unpredictability in Myanmar may be the new normal, no longer to be dealt with through ‘*exceptional measures*’.<sup>3</sup> The Livelihood

<sup>2</sup> See e.g. LIFT Strategy Reset 2022-2023. The fourth strategy period (2019-2023) was ‘*driven by an optimistic outlook on Myanmar’s growth, democratic transition and more conducive policy environment for pro-poor policy making*’ (p. 4)

<sup>3</sup> Further shocks may affect Myanmar, e.g. Russia’s war in Ukraine has global economic impacts. It risks diverting political attention and aid funds away from other crises.

and Food Security Fund (LIFT), for one, holds that all actors now need to adjust to the post-coup realities for the long haul.

Many Myanmar actors are responding to the increased and more acute needs. These include the people directly affected, various types of local associations and community-based organisations (including e.g. social welfare or 'parahita' or 'altruism' organisations, ethnic 'literature and culture' associations) as well as more formalised and organisationally structured 'civil society' organisations (CSO). Some of the Ethnic Armed Organisations (EAOs) run public services e.g. for health and education, which make up another type of responder. Besides them are the various international aid organisations, responding directly or with Myanmar actors. The responders too have been severely affected by the coup and its negative impacts. (see Annex 3)

Crisis responses in Myanmar must take into account the significant differences in subnational contexts. These correspond only partially to the administrative divisions into States and Regions. These differences arise from different political and security situations, needs, existing capabilities and operating conditions that also influence access. For a brief description, see Annex 4.

**The 2015 Assessment Leading to the Creation of the HARP-F**

The HARP-Facility was created by the UK government in 2016 to respond to an assessment that identified collective weaknesses:

- Variable geographical coverage of humanitarian assistance and emergency response capacity
- Poor coordination, strategic management and policy of humanitarian assistance for protracted crises and emergency response
- Inadequate technical, delivery and M&E capacity of implementing partners
- New and complex crises have resulted in a focus on responding to immediate humanitarian needs. Emergency preparedness, less visible needs, and considerations of operating in a more protracted crisis environment have not yet been addressed. Opportunities for building resilience are not systematically considered.

[2015 Business Case]

The relevance of its subsequent investment in stronger preparedness, including among Myanmar actors, is confirmed by the current situation.

**III. WHERE WITH LOCALISATION IN MYANMAR? THE STRATEGIC AND COLLECTIVE LEVEL**

**1. Dilemmas for international aid actors**

International aid actors want to respond, as best as possible, to the acute but also longer-term and structural needs. In a complex context many different considerations need to be weighed against each other, for example

- Can we deliver support still at scale (and at what scale) while in practice the operating conditions in many parts of the country seem to allow only smaller scale responses?
- Do we rely more on the international agencies that still operate in (parts of) Myanmar, or do we support to a greater extent the many non-governmental Myanmar actors that continue to respond?
- Do we focus our limited resources on responding to the acute needs of people in Myanmar, or do we also seek to maintain and strengthen Myanmar actor capabilities for what will obviously be a continuing protracted crisis?
- Do we maintain a practice of 'determined design' proposals and planning, where the interventions, budgets and expected results are planned in detail in advance, in the face of circumstances that force responders to be largely reactive and at times highly adaptive?
- Can we maintain quality standards, across the geography, when many actual responders do not have the expertise, the organisational capabilities and/or the operating conditions to do so?

- Do we continue to demand extensive documentation to manage fiduciary risks, while this may not be feasible in practice and in various areas increases the physical risks for actors on the ground?
- Do we continue to think and operate in terms of individual agencies, or adjust our practices to enable and strengthen collective capabilities and -responses?

These are dilemmas for which there are no simple answers. Still, they will be influenced by the general importance given to the localisation commitment, and its translation into practice. It is relevant then to review the question: Why localisation and what does it mean in practice?

## 2. Why Support Myanmar (Non-governmental) Actors?

A fundamental gap in the Grand Bargain document, and related ones such as the 'Principles of Partnership' (Global Humanitarian Platform 2007) is the failure to elaborate the why. Clarifying the 'why' question is critical: it determines how much *will* there is to do something or not.

*“The key thing about this is about the political will. If there is no will to make annoying changes at HQ level, then the downstream is doomed to only go so far. This is something that local organisation cannot push donors on though because this depends on a genuine internal attitude shift. For example, if localisation is going to be the same as gender or women, peace, and security agenda, great, we will have affirmative action and quotas, but without the political will, then it will just remain as tokenism.” National NGO leader*

The commitment to support and reinforce national and local actors, globally and in Myanmar, can be based on a combination of reasons.

Myanmar specific reasons:

- Even though they too face access challenges, and have supply and other operational and organisational problems, in many places Myanmar actors are and will continue to be not just the 'first responders' but the responders over time. This includes not just 'NGO-type' organisations, but also all sorts of community-based, faith-based, professional associations etc. Notwithstanding the high poverty rate, the people of Myanmar have historically shown great generosity and commitment to help each other. (Local Resource Centre 2018)
- Over the past decade, much has been invested, by Myanmar and international actors alike, in developing and strengthening a vibrant Myanmar 'civil society'. Not just for humanitarian action but also for better governance. Myanmar civil society has a vital role to play in a less violent, more inclusive, and democratic future. Adding to the pressures on them now, by not adequately supporting them in a time of acute life-threatening crisis, will also weaken Myanmar 'civil society'.
- Myanmar remains structurally vulnerable not only to conflict but also to natural disasters and climate change impacts. International aid agencies, even with more funding, cannot match the potential capabilities of people of Myanmar to face up to this. The long-term, structural option can only be strong collective capabilities of Myanmar actors. That is what 'resilience' is ultimately about. This will require more structural investment in capabilities, beyond project-based support.
- Whether familiar with the many international commitments to build on the capacities of local actors or not<sup>4</sup> (several were present at the World Humanitarian Summit), Myanmar NGOs are strongly in support of more localised, flexible and adaptable funding and responses, and the Myanmar Local Humanitarian Network (MLHN), a network of networks, is promoting and demanding it.

<sup>4</sup> Research in 2020 found that also national and international staff of international agencies who formally signed up to the Grand Bargain or e.g. the Charter4Change, are also not familiar with the commitments their agencies have publicly taken on. (GMI 2020)

Several of the country funds, like Access2Health (A2H) and the Nexus Response Mechanism (NRM) are explicitly committed to localisation and participation in their overall strategy or programme papers.<sup>5</sup> For some, the COVID situation in Myanmar (starting in the spring of 2020) led to further localisation. LIFT, in its 2022-2023 Strategy Reset [pp. 3/13-15], sees the current situation as requiring a further acceleration of localisation efforts as part of its '*Relief and Resilience Response Framework*' but also to sustain a Myanmar civil society. It created a 'Localisation Window' and has a 'Civil Society Programme', explicitly oriented to the protection of civic space and support for civil society actors, knowing they are generally opposed to the coup and a return to military dictatorship.

Broader reasons:

- The 2016 Grand Bargain commitments were influenced by the prior report of the High-Level Panel on Humanitarian Financing. This expressed concern over the growing humanitarian financing gap: globally needs were rising faster than the available funding. The ten commitments, including of localisation, are intended to render the global humanitarian economy more cost-effective. That financing gap has since increased further because of the economic impacts of the COVID pandemic restrictions, and now the war in Ukraine. The 2022 appeal for global humanitarian needs amounted to US \$ 41 billion – before the Ukraine crisis. [OCHA 2022] This is a huge increase compared to the 2013 appeal (US\$ 13 billion) or the 2019 one (US \$ 28 billion). It will be underfunded globally, and for major crises such as Afghanistan and Yemen. International agencies are more expensive than national/local actors. Irrespective of whether the 2022 appeal for Myanmar is well funded or not (which it is not), there is a general responsibility to be more cost-effective, also in Myanmar.
- Globally, keeping local and national actors subordinate to the priorities and decisions of the international aid system is depriving a world in growing need of the full potential of many more actors who could do more if better supported. It is comparable to depriving the world of the full potential of women, by keeping them as 'implementing' rather than 'decision-making' partners. Globally, and in Myanmar, several national/local actors are demanding a system that is less reflective of a colonial world order and which allows more space to grow their capabilities and confidence to support their communities. This should be an expected and desired outcome of 'capacity-strengthening' support. They not only demand a greater share of the funding and better-quality funding, but also a change in the political economy of aid, where power is heavily concentrated in the hands of internationals. The 'decolonise aid' and 'shift the power' movements point at this.<sup>6</sup>
- International aid agencies have been promising, voluntarily, to '*build on local capacities*' for more than 25 years, since at least the 1994 Code of Conduct for the Red Cross and Red Crescent Movement and NGOs in Disaster Relief. The 2016 Grand Bargain is only the most recent public commitment, that most Western donors and big international aid agencies have signed up to. Not keeping those promises undermines the credibility of the international aid system and becomes a reputational failing.

An alternative, even opposite, perspective understands humanitarian action as strictly focused on life-saving emergency relief. Addressing the widening poverty in Myanmar is then a social protection issue and the responsibility of development actors. Moreover, the standards of humanitarian action have been raised

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<sup>5</sup> For an overview of localisation relevant policies of some international agencies in Myanmar, see Connell & Chui 2022:42]

<sup>6</sup> LIFT's understanding of localisation is '*the shift of power from international to local development actors*' [LIFT 2021:3]



significantly over the past 20 years. Agencies not able to meet them, right now, cannot expect any direct funding from international donors. Investment in Myanmar capabilities to meet those standards may be

needed but is again something for the development actors. Such viewpoint goes against the letter and the spirit of the Grand Bargain.<sup>7</sup> It also suggests that what Myanmar actors do to help their own people is inferior and that they only merit international financial support as delivery assistants under international supervision.

*Recommendation 1 to back-donors: Acknowledge that Myanmar continues to be a protracted crisis and clarify, institutionally, whether supporting the diverse set of Myanmar responders as actors in their own society and not just as delivery instruments for international aid is a value and objective. Time frame for action: Short-term. (within next three months)*

### 3. Understanding Localisation

#### a) Beyond the money

Localisation in Myanmar is actively discussed, but confusion can remain about what it means. (Connell and Chui 2022:19). Localisation is about more than direct funding to local actors. In the terms of the Grand Bargain, it means to 'support and reinforce local/national actors', not to replace or subordinate them - *in a level playing field where we all meet as equals*'. (Grand Bargain 2016:5/2)

#### UNDERSTANDING LOCALISATION

Localisation has been defined as 'a process of recognising, respecting, and strengthening the leadership by local authorities and the capacity of local civil society in humanitarian action, in order to better address the needs of affected populations and to prepare national actors for future humanitarian responses.' [OECD 2017:1]

'In a narrow sense, localisation can be seen as strengthening the role of local actors in the context of international aid, with the goal of reducing costs and increasing the reach of humanitarian action. In a broader sense, it can be viewed as a way of re-conceiving of the humanitarian sector from the bottom up; recognizing that the overwhelming majority of humanitarian assistance is already provided by local actors.' [Grand Bargain Workstream on Localisation 2021:9]. Localisation requires international actors to:

- Recognise local leadership and initiative, existing local knowledge, local actor coordination and strategy; bring decision-making power closer to affected communities
- Recognise the power imbalance in the existing international aid architecture and move towards real equitable partnerships
- Provide direct, quality-and multiyear funding, that includes internal cost recovery (ICR)
- Equitable partnership requires transparency, risk sharing and mutual accountability
- Contextualise, simplify, and render flexible procedures and requirements
- Reduce overall bureaucratic burden while maintaining minimum requirements and accountability
- Promote horizontal 'localisation' with local-to-local capacity exchanges and -development.

[Myanmar Local Humanitarian Network 2022 at HARP-F webinar]

<sup>7</sup> The Grand Bargain very explicitly calls for 'Increase and support multi-year investment in the institutional capacities of local and national responders, including preparedness, response and coordination capacities, especially in fragile contexts and where communities are vulnerable to armed conflicts, disasters, recurrent outbreaks and the effects of climate change.' [2016:5]

A few other observations must be made here:

- *Localisation seeks to reduce and reverse excessive internationalisation:* Locally led action is or should be the normal situation. 'Localisation' only becomes an issue after a prior wave of 'internationalisation' that takes away the leadership and initiative from national actors. In Myanmar, such internationalisation happened after 2008, with a second wave in 2015-2016. Before, there was de facto 'localisation'.
- *Localisation by design, not by default:* The public commitments by international actors are for localisation-by design. In practice, we observe a lot of 'localisation-by-default': International actors step back when they cannot or dare not implement directly and/or when their funding declines. Localisation-by-design means that the strategic objective is not just to deliver goods, services and protection to people in need, but to do so in a way that leaves a clear legacy of stronger local and national capabilities or 'resilience' beyond the household and community level. That objective is also planned for, progress monitored, and achievements evaluated.
- *'As local as possible, as international as necessary'*, is a phrase from the Grand Bargain. This is relevant, and localisation does not deny roles for international actors. In Myanmar today, no Myanmar actor can replace the roles and capabilities of e.g. the World Food Programme (WFP) or the International Committee of the Red Cross (ICRC). Yet research elsewhere has indicated that often the reality is *'as international as possible, as local as necessary'*. (e.g. Barbelet 2018) Which reflects localisation-by-default, rather than by design. This also applies to the practical interpretation of 'complementarity': From a localisation-by-design perspective, international actors ask: what is this local actor already or potentially capable of, and how can I/we complement

*"Hearing from our local humanitarian partners, these days the UN tends to implement directly, and it is only when that is not possible that they start to look for local organisations to "partner" with. This highlights the mindset that needs to change. Local organisations should not just be a "plan b" for when international agencies don't have access."*  
National NGO leader

her or him? In practice, some international aid agencies seek to do as much as possible themselves, and only look for others to complement them where they reach their limits.

- *A broad spectrum of national/local actors:* Localisation should not necessarily lead to 'NGO-ization' of national and local non-governmental actors. Nor does it exclude community-based associations and community/social group led action. As seen in the previous section, social groups and CBOs are among the important responders in Myanmar today. In the Grand Bargain document, the commitments to localisation and to a participation revolution are separate, practices of some international actors in Myanmar show strong integration of both, with a willingness to support community-led action.
- *UN and donors also committed:* The localisation commitment applies as much to UN agencies as to INGOs. It also puts the spotlight on donor practices. Donor practices enable or constrain it and cannot be left out of the picture

**HARP-F and Localisation: No explicit reference but multiple good practices**

The 2015 Business Case underpinning the creation of the HARP-F did not mention support to Myanmar actors as an explicit objective, though several of the practical approaches it envisages are in line with this. The first annual review, in late 2016, not surprisingly given the World Humanitarian Summit a few months before, refers explicitly to the Grand Bargain that the UK government also committed to. By 2019, the annual review observes that *'Localisation is at the heart of HARP- programming'*.

The localisation review of HARP-F found no explicit reference of how the Facility understood it in practice or what success would look like. Nor was there a systematic induction on this for staff joining. In late 2018-early 2019, HARP-F held consultations with 16 agencies, mostly Myanmar CSOs, to hear their awareness and understanding of localisation, interest in it and perceived constraints or obstacles. But the resulting -unpublished- document *'Making Localisation Work. Identifying and addressing stumbling blocks to effective localisation'* did not become an internal reference.

Notwithstanding the absence of an explicit reference, HARP-F's practices were well aligned with the fundamental premise of supporting and reinforcing local actors. More than that, they were in line with several other Grand Bargain commitments, notably more and better coordinated cash programming; a participation revolution; multiyear planning and -funding; reduced earmarking and flexible funding and simplified reporting requirements. Even if in previous years, HARP-F communications sometimes spoke in favour of localisation because Myanmar actors still could go where internationals could not, its stance since has become clearly in favour of localisation-by-design: *"It requires planning, systems, checks and balances and, above all, trust."* (2022: The Power Structure of Localisation p. 1)

*Recommendation 2 to all international actors: Adopt the correct understanding of localisation as supporting and reinforcing local actors, in a spirit of inclusion, mutual respect and genuine partnership, rather than replacing or subordinating them. Accept this as a policy by design, not just by default given the current circumstances in Myanmar. This is what the Grand Bargain intended and what international agencies committed to. This requires active attention to the power dynamics in the collaborative relationships, and frank conversations about the responsible use and potential abuse of power. If not already done so, articulate this in a policy statement. Time frame for action: Short-term (within next 3 months)*

**b) Localisation, the participation revolution, and resilience**

Historically, the dominant practice of the international humanitarian sector over the past three decades has been for internationals to assess the needs (no longer the capacities, see IFRC 2006) of crisis-affected people, and then to design and deliver an intervention to respond to these. Since 2001, it is recognised that aid agencies should also be accountable to the affected population (including those not selected to benefit). Accountability to affected population in practice often means 'feedback and complaints mechanisms' (FCM) and occasional 'satisfaction surveys'. These are late in the process when big decisions have already been made. They score low on the 'ladder of participation'.<sup>8</sup> Whether such feedback can result in significant redesign of an intervention, if needed, remains uncertain. When FCM are set up as individual agency mechanism, confusion and disconnects can arise where different agencies provide various services to the same population. Such feedback also may not get dedicated attention in internationally led coordination spaces, something the FCD0 in Myanmar has been urging needs to happen more.

A more substantive participatory approach are survivor and community led responses (SCLCR). Displaced people from Marawi in Mindanao (Philippines) demanded such with the strap line *'Nothing for us without us'*.

<sup>8</sup> Roger Hart created a stepwise typology of participation, with children and youth in mind. In the lowest rungs, young people are manipulated or only present as decoration. At the highest level, they fully share decision-making with adults, or take all decisions by themselves. <https://gardening.cals.cornell.edu/program-tools/planning-organizing/effective-youth-engagement/harts-ladder-of-participation/> The ladder is applicable to all sorts of other situations, for example Sherry Arnstein used it to describe different levels of citizen 'participation'.

At a fundamental level, it responds to the desire of crisis-affected people not just to have their needs met, but to regain control over the decisions that affect their lives. Which is exactly what multi-purpose cash (MPC) also responds to.

The Grand Bargain speaks explicitly about a *'move from the present supply-driven model dominated by aid providers to a demand-driven model more responsive to the people we are assisting'*. (Grand Bargain 2016:2) Yet SCLCR globally remain an undercurrent in the international relief sector, notwithstanding the fashion for 'resilience'.<sup>9</sup> Other than with MPC, the top-down international aid system is not very enabling for community/social group led actions. Its desire for predictability and pre-identified results gets in the way. For example, one of the INGOs interviewed for this review runs a small grant scheme (maximum US \$ 4000), the allocation of which can be decided by the social group/community. Yet one of its donors struggles with the fact that the INGO cannot say in advance exactly which communities will get what amount of grant and what they will use it for.

### Survivor and Community-led Crisis Response: Guiding Principles

1. Adopt a new mindset that recognises crisis-affected people as first and last responders.
2. Adopt strengths-based participatory assessments and appreciative inquiry method.
3. Challenge gender narratives: women as leaders, not victims.
4. Strengthen (do not weaken) collective action, social cohesion and sense of community.
5. Support multiple different groups to reflect the heterogeneity of crisis-affected people.
6. Explicit transfer of power (using microgrants) to community groups.
7. Promote broader well-being and psychosocially informed approaches.
8. Recognise that a crisis-affected population's natural tendency is to respond holistically.
9. Develop new management systems and organisational cultures that incentivise staff to let go and allow greater sharing of power.
10. Give more focus to supporting local government agencies to adopt and fund sclr.
11. Redefine relationships between donors, national and international agencies.
12. Support 'whole of system' change that motivates all aid departments to challenge assumptions and accepted norms that limit opportunities for humanitarian aid to enable local agency.

Positively, the acceptance for social group/community led responses, at least among the country-level funds looked at for this research, by contrast seems high and is encouraged both by long-running limitations on access and mobility in several areas, and the objective of 'resilience'. The text box shows how HARP-F with some of its partners have been has been evolving in this direction in the WASH sector.

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<sup>9</sup> Cases studies have been researched and supported by e.g. by the Local to Global initiative. [Corbett et al 2021] A 2018 IARAN report frames it as *'From Voices to Choices'*. [Maietta et al 2018] The approach resonates with 'participatory budgeting', where citizens determine the allocation of at least a part of a budget, usually of a local administration. The same spirit informs ActionAid's alternative approach to value-for-money, where this is determined by the intended beneficiaries. [D'Emidio et al 2017]

### HARP-F and a Participation (R)evolution in WASH

Increasing community-management can be seen particularly in the WASH sector, in which HARP-F has been a major player in Myanmar. It has been well documented by its WASH review. With its '*community participation matrix*' it looked at who played what key role (planning, managing, doing, monitoring, paying) in the planning of WASH interventions and in the upkeep and smaller and larger repairs. In practice, this could vary between the INGO or Myanmar CSO, its camp-based staff, a WASH committee or broader Community Management Committee, WASH volunteers, a contractor. Not surprisingly, community-actors can decide and handle most aspects of smaller repairs, while the larger ones require more NGO and/or private contractor involvement. Stronger reliance on community-based resource people was accelerated by the COVID mobility restrictions starting in the spring of 2020, as could be observed with e.g. KMSS relying more on WASH committees and peer education groups. That does not mean that COVID was the central catalyst: Oxfam in Rakhine State for example was already on a trajectory from a very INGO led intervention in 2017 to much more community consultation by 2020-21, with greater community-leadership in the years to come. (Snoad 2022) Reportedly, the WASH cluster as a whole is taking up this issue of deeper participation and community leadership.

Noteworthy is that such evolving approach tends to be enabled by multi-year funding. This gives enough time to access harder-to-reach groups, get to know them and their internal dynamics, and build the relationship that eventually becomes one of co-leadership and increasing 'community/social group' leadership and decision-making. This obviously requires a certain stability/continuity in the 'community', even if in IDP camps. It would be difficult with more shifting and changing populations.

To take this to further, attention is required to three points:

- *Internal social group dynamics*: The term 'community' carries connotations of a relatively cohesive social group with a certain amount of internal care to all its members. That cannot be assumed. Even within established social groups where people know each other, there can be patterns of discrimination and exclusion based on internal power dynamics. These can and are also played upon by powerful actors (including the state and the military) for their own ends. With the increased forced (and repeat) displacements in the country today, in many circumstances there will also be 'newcomers' into established social groups. Are they included on a par with the long-time members of the group? The INGO mentioned before, who tries to provide community-grants, acknowledged that this was not a point they were able to have a good enough eye on.
- *What are the limits of self-reliance for what need?* The relief sector sometimes speaks about resilience as it can exist at the level of a household or a co-residential 'community'. That is obviously not the case.<sup>10</sup> The experience of HARP-F partners for WASH, particularly in the IDP camps in Rakhine State, indicates that actors external to the social group may still be needed for larger repairs and/or to provide certain spare parts that cannot be locally made. (Snoad 2022). This point is also recognised for cash programming, the justification for which depends on an assessment that there are local markets where cash or voucher recipients can obtain what people are likely to want. If the SAC security forces impose blockades on aid and trade in certain parts of the country, those residing within the blockaded area will have to find alternatives with the resources locally available. Their ability to be self-reliance may be precarious.
- *How do people in Myanmar understand 'resilience'?* Research signals that this can be about more than physical protection and maintaining basic goods and access to basic services. It can be a deeper mental state linked to prolonged political and economic pressures and challenges. It can be strongly connected to maintaining identity, lifestyle and culture, and ownership over heritage land. Vulnerabilities but also people's responses can vary significantly between locations. In some

<sup>10</sup> LIFT appropriately defines resilience beyond the household and community level as: "*the increased capacity of individuals, households, communities and the natural and social systems they depend on to cope with (i.e. mitigate the negative impact of) and recover from (i.e. return to equal or better conditions after being affected by) various shocks and stresses arising from climate change, conflict and both macro- and micro- (lifecycle) economic pressures.*" (LIFT 2022 Strategy Reset:9). The definition is still very much in relation to shocks rather than agency-in-crisis.



areas, there can be strong cross-community networks and -support (including across ethnic identities), in other areas much less so. This points to the importance of participatory research and community-led design. (DCA/NCA 2020 a & b) Such understanding of 'resilience' is in line with the proposal of a general study to see is as 'agency-in-crisis' more than the ability to withstand and recover from shocks. (Levine et al 2019:1)

*Recommendation 3 to back-donors, international and Myanmar operators: Include the meaningful participation of affected social groups/constituencies in the localisation policies and practices. This goes beyond feedback and complaints on agency-decided interventions and accepts social/group community influence on priorities and design- and implementation decisions. This is not losing control but sharing control with those we intend to benefit. It is support to resilience understood as 'agency-in-the-face of crisis'. Active attention remains required to patterns of inclusion/exclusion within the social groups/communities and to the limits of what they can do with their own resources and where they need assistance from outside the group. Time frame for action: short-term.*

#### 4. Articulating What [Progress Towards] Success Looks Like

Another key question that the Grand Bargain and related international promises to support local actors, fail to ask is what success (or significant progress) will look like? Perhaps most referred to is the Grand Bargain target of 'at least 25% of humanitarian funding to local and national actors as directly as possible', by 2020. Hence, HARP-F for example, will mention that 33% of its £ 74.5 million expenditure has gone to Myanmar actors. (HARP-F 2021b:2). This however is an output target, not an outcome objective. On the other hand, articulating success in terms of 'strong enough collective capabilities among Myanmar agencies to deal with challenges with only targeted support from international agencies' would be too vague. To be meaningful, the progress objective needs to be articulated like any other: By time X, we want to see the following changes to have occurred. The desired changes relate to Myanmar actors exercising leadership and playing action roles that previously were largely done by international agencies (including decision-making) or playing them even better. From this envisioned change objective, we can work back and say: what is the current situation, and what needs to be done by whom to achieve that objective?

Success, or meaningful progress, can be articulated for itself by each international aid agency in its relations with Myanmar actors. But no single agency can face the challenges by itself. Ultimately, all of this must be framed under a collective strategic framework, with some common indicators, progress against which is collectively monitored and accounted for. The strategic question then is not only: *How do we deliver assistance to the many in Myanmar now in urgent need?* The additional questions are: *How do we do this in ways that support and reinforce Myanmar actors?* And, as the situation in Myanmar has been and will continue to be a protracted crisis: *What legacy do international actors want to leave in terms of strengthened collective capabilities of not just of households, but of social groups, organisations and eco-systems, in which different organisations collaborate effectively for greater cumulative impact?*

These are examples in other countries of collective frameworks to drive localisation such as the 'Framework for Localisation in Somalia' and the 'Operational framework for localisation' in Nigeria. In Jordan a 'MEAL framework for the localisation of humanitarian action' has been developed, with multiple indicators that can be monitored. In the Philippines a multi-stakeholder 'country localisation dialogue' took place in 2021 that also included members of the business community and from local communities.

Two important questions merit attention here:

- One national or more sub-national collective strategies? As mentioned, the organisational experiences and capabilities of Myanmar actors and the operating conditions are not the same in every Region and State. Localisation may not advance at the same speed and according to the same trajectory everywhere. (GMI May 2020) Collective strategies tailored to specific sub-national contexts seem more appropriate than one grand national framework. Ultimately, and in keeping with localisation principles, this framework should be determined by Myanmar responders themselves.

*“[The question of the best localisation strategy] is not black and white. In those regions where there are stronger national NGOs, then the funding/assistance should go through them towards smaller CSOs. In cases, where there are no big local organisations, then INGOs/donors should have a different approach, for example, through consortia. In that case, those CSOs who have the potential to grow stronger, can learn by doing in consortiums where funding is linked to capacity strengthening and there can be technical inputs to support that from other consortium members. But whatever happens, it should be a region-specific approach because the micro-ecosystems are very different in the different parts of the country.”*  
National NGO leader

- Should every technical thematic sector have its own localisation strategy? The international coordination structure is based first on technical-thematic sectors and working groups. As in other countries, there is then a tendency to create localisation task forces or working groups in each (the WASH cluster for example has one and one is recommended for the Nutrition cluster in the HARP-F review). While positive in principle, deeper reflection is required here:
  - From the perspective of affected people and Myanmar actors, thematic segregation does not make sense. There is a set of needs that must be met holistically. Their natural inclination is towards an area-based perspective.
  - Given the different starting points and operating conditions, subsuming sectoral-thematic considerations under an area-based approach seems most fit-for-context.
  - Single agency perspectives are not helpful: A stronger emphasis on and support for collective capabilities of Myanmar actors in a given area, means that not every agency needs to have sectoral-thematic expertise on everything. They can complement each other if there is the willingness to work collaboratively.<sup>11</sup>

This would lead to collective localisation strategies framed as e.g. What is the progress/change objective in terms of collective Myanmar actor capabilities (covering different technical-thematic areas) in southern Shan by June 2024? The same question can be asked for e.g. central and northern Rakhine State or for Sagaing Region – but how the objective is defined for each area and how to get there may differ.

The relevance of the questions is illustrated by e.g. the (pre-coup) 2020 Programme Strategy for the then newly created Nexus Response Mechanism, which had a strong area orientation (p. 12 ff). The LIFT Fund used to have area-based funding pots (2015–2018) and has now (partially?) shifted to thematic funding pots. Both are justifiable, the question is how to combine them for best-fit-with-current-context?

<sup>11</sup> *“One of the strategic ways the NRM will increase the sustainability of its programmes is by strengthening local response systems – the ecosystem of local actors including government officials, civil society organizations, community groups, religious organizations, and other stakeholders that collectively make up civil society and which are at the front lines of humanitarian response and local development.” (...) “the NRM will push for a more localised response founded on both a strategic and comprehensive approach to programming that focuses on strengthening local response systems as a whole, rather than individual local stakeholders” (NRM 2020:12)*

*Recommendation 4 to international and Myanmar operators/responders: Jointly develop collective frameworks to advance or deepen localisation, with a shared vision of what success will look like, and agreement on key milestones and how progress will be assessed. That implies a MEAL framework and periodic joint reviews. Develop separate frameworks for the different sub-national contexts in Myanmar which have different needs, actor-capabilities, and political, security and logistical operating conditions. Localisation progress therefore may not follow the same trajectory and go at the same speed everywhere. Insert sector-specific localisation strategies under area-based ones. Use independent facilitators with deep understanding of localisation and experience in supporting multi-stakeholder processes to develop these frameworks and conduct progress reviews. Time frame for action: Medium-term (initiate the process within the next 6 months)*

## 5. Humanitarian Principles Fit-for-Context

An argument sometimes used against localisation is an alleged weaker ability of national/local organisations to abide by notably the humanitarian principle, notably of 'impartiality' and 'neutrality'. The issue has come up in Myanmar, causing some national staff to resign from international aid agencies, and leading to Myanmar CSO critiques of statements by international figures that are perceived as too even-handed. (see e.g. Mizzima 2022; Ohmar 2021; Fishbein 2021) A nuanced perspective is required here.

*Impartiality is highly relevant:* Given the significant increases in displacement following the coup, from activists fleeing the cities to whole groups fleeing artillery fire and bombing, impartial inclusion of whoever is in need is an attention point. It is even more so given the strength of identity politics in the country, between Bamar and so called 'ethnic minorities' but also among these 'ethnic minorities'. The issue of the Rohingya, whose recognition as citizens of Myanmar had been deliberately eroded by the military junta already prior to the 2017 violent expulsion (see Wade 2017) and continued to be denied under the shared power government (2016-2020) remains a major attention point. Also in the camps in Cox's Bazar, Bangladesh, their views have not been sought out and taken into account, partially because the Government of Bangladesh policy objective is their return to Myanmar.<sup>12</sup> Rohingya rights have also been challenged by Rakhine nationalists.<sup>13</sup> Already before the coup, there were also other 'minorities among minorities' – the displacements will only have added to that. Myanmar CSOs could be the flagbearers of non-discrimination between people in need and have made clear collective statements and commitments to impartiality.<sup>14</sup> The coup may also be providing a window of opportunity where many segments of the population who may previously have been antagonistic toward one another, are drawn together in solidarity against military rule.

*Neutrality as fundamental position or tactical practice?* Being politically 'neutral' in the current polarised environment is a big ask. Many in Myanmar have lived through decades of brutal military repression and now see the army waging war on its own population, reversing a decade of greater freedoms and economic opportunity. And this after the overthrow of a government elected in what were assessed to credible elections that legitimately reflected the will of the Myanmar people. Almost all CSOs oppose the SAC, and the challenge how to position oneself in this polarised environment is applicable to them as to the international agencies. A few observations are relevant here:

- Most international aid agencies *do* humanitarian work but *are* not 'humanitarian'. They are multi-mandate, have run programmes to change the social-economic and possibly governance order

<sup>12</sup> Based on GMI's own field work in Cox's Bazar, that of the ODI (Wake et al 2019) and the X-Border Local Research Network (Olney 2019). See also CASS 2020]

<sup>13</sup> It remains to be seen whether the NUG and the Arakan Army will really recognise Rohingya rights and include them equally in their governance practices.

<sup>14</sup> For a critical perspective on 'impartiality' in practice, see Slim 2021b

before the crisis became acute and will do so again. Only a very few, usually with a strong medical services core, are purely 'humanitarian'.

- International aid agencies by and large have developed post-coup engagement principles that restrict the engagement with SAC-controlled governmental institutions to the minimum necessary. Some have signed a Memorandum of Understanding, or are considering doing so, with the SAC authorities. That can be inevitable to deliver assistance to people in SAC-controlled areas, with the possibility to be a witness of what is happening. It must not be driven by a real-politik wish for business-as-usual.
- Even for the Red Cross, perceived neutrality has always been a pragmatic, not a dogmatic principle, to maintain the likelihood, globally, to get access in any type of conflict. In the words of its first major explainer of the principles: *"The truth is that nothing in life is absolute. The doctrine of the Red Cross, formulated at a particular moment in history, applies to a living world in never-ending movement, to a society composed of men who have not attained perfection. Sometimes it represents an ideal model to which we may aspire, rather than an unbending and rigorous law."* (Pictet 1979:14) In Myanmar, the SAC does not see a space for an independent civil society and is not inclined to give most of the CSOs fairly unrestricted access. The operational benefit then of pretending to be neutral may be very limited.
- Another major commentator on the principles has argued that one can be a very effective 'humanitarian' without being politically neutral. (Slim 2020a; 2020b; 2021a; 2022 chapter 6) There is clear tradition, though less well known, of 'humanitarian resistance'. His take on the situation in Myanmar is that *"Either they can hold firm to principled humanitarian action and engage with the junta as classical humanitarians to try to save as many lives as they can during the military dictatorship. (...) But principled humanitarian action will see these agencies pressured into rotten compromises and thwarted in their mandates and ambitions, made to endure the usual 'race to the bottom' of what is possible under the control of a dictatorship with very different principles."* He also refers to humanitarian work during the war in El Salvador: *"The values guiding this sort of humanitarian life-saving and democratic support were dignity, rights, courage, accompaniment and secrecy – not neutrality, independence and transparency."* (Slim 2021a) These corresponds to other values and principles that Myanmar CSOs consider important: commitment, dedication, gratitude, respect, passion, volunteerism, protest, leadership. (Christian Aid 2019:14).
- A 'nexus approach' cannot be totally 'neutral'. With more protracted crises and an overstretched humanitarian system, merely working on the symptoms of a crisis is not enough. The causes need to be addressed, violence reduced, and conflict transformed.<sup>15</sup> That means peace and democratisation work as part of a 'nexus' approach. We must be politically smart but do not have to be politically 'neutral'.<sup>16</sup>

*Recommendation 5 to back-donors, international and Myanmar operators: Promote and insist on impartiality understood as 'non-discrimination', including the right of no-longer combatants to humanitarian care. Be clear that political neutrality is and always has been a tactical and not a fundamental principle that should not be insisted upon for those who cannot realistically hope it will lead to greater access. Tactical neutrality also does not absolve the aid agency for the responsibility to defend fundamental rights and the constraints imposed by international humanitarian law. Time frame for action: short term (within three months).*

<sup>15</sup> That was already clear in e.g. the 2016 Agenda for Humanity and is also clear for the current UN Undersecretary General for Humanitarian Affairs and Emergency Relief Coordinator, M. Griffiths (Aly 2022) See also DuBois 2020

<sup>16</sup> See also Olbrecht & Knox Clarke 2015



#### IV. OPERATIONALLY SUPPORTING AND REINFORCING MYANMAR ACTORS. THE 'HOW'?

A practically useful framework is that of the 'seven dimensions of localisation'.<sup>17</sup> This research focuses on the first five dimensions and touches only briefly on the ability of national/local actors to have a say in how international standards are translated in their context(s), and them being given visibility and credit for their roles and achievements.

Each dimension can be examined in its own right, yet they are also closely interlinked.<sup>18</sup> As this report will show, there is a structural link between funding and capacities/capabilities. That in turn can influence the presence and contributions of national and local actors to coordination. Putting the quality of relationship first however, is deliberate: If the quality of relationship is not good, little meaningful may happen in any of the other dimensions. This corresponds to the 'Principles of Partnership' that a Global Humanitarian Platform articulated in 2007, and to the 2016 Grand Bargain's affirmation that it provides a '*level playing field where we all meet as equals*' and whose '*benefits are for all partners, not just the big organisations*'. (p.2).

RELATIONSHIP QUALITY	PARTICIPATION REVOLUTION	FUNDING & FINANCING	CAPACITY	COORDINATION MECHANISMS	POLICIES AND STANDARDS	VISIBILITY AND CREDIT SHARING
<ul style="list-style-type: none"> <li>• respectful and equitable</li> <li>• reciprocal transparency and accountability</li> <li>• 'decision-making' not just 'implementing partners'</li> <li>• Unequal power not abused</li> </ul>	<ul style="list-style-type: none"> <li>• deeper participation of at-risk &amp; affected populations</li> </ul>	<ul style="list-style-type: none"> <li>• better quality</li> <li>• greater quantity</li> <li>• adaptive</li> <li>• financial health</li> </ul>	<ul style="list-style-type: none"> <li>• Sustained and growing organisational capabilities</li> <li>• collaborative capabilities</li> <li>• stop undermining capacities</li> </ul>	<ul style="list-style-type: none"> <li>• national actors' greater presence and influence</li> <li>• beyond 'avoiding duplication' – collaboration for collective impact</li> </ul>	<ul style="list-style-type: none"> <li>• national actors can contribute to and influence global and national policy and standards-development, and their application in their contexts</li> </ul>	<ul style="list-style-type: none"> <li>• roles, results and innovations by national actors are given credit and communicated about by international actors</li> </ul>

#### 1. The Quality of the Collaborative Relationship

##### a) Revaluing 'partnership' and transparency about the nature of the relationship

The aid sector uses the word 'partner' for anyone receiving a grant or subgrant. This degrades a term that in its connotations refers to a high-quality relationship. Partnerships exist where different entities come together because they recognise they have a common purpose and that each has something to contribute that is necessary to achieve that purpose. Partnerships are perfectly possible without money transfers: the real foundation is perceived complementarity and compatibility for a shared purpose. 'Partnership', in the meaningful sense of the word, implies basic respect between these entities even if there are power-differences, and shared risks and shared benefits. It implies mutual transparency and accountability, rather than only from the national actor to the international one. In short, partnerships are by nature 'equitable'.

<sup>17</sup> The framework took shape and was tested in 2017-2018 through mandates for the Start Network. It is the basis of the 2019 NEAR Localisation Performance Framework and the 2019 Humanitarian Advisory Group's (HAG) framework to measure localisation. [HAG 2019] These two do not however include the cross-cutting issues of diversity and inclusion; accountabilities; risks and opportunities and humanitarian principles.

<sup>18</sup> Individual agencies and their Myanmar partner can sit first separately to evaluate where their collaboration is against each dimension, then compare notes and decide together what they want to change, by when and how.



National actors, also in Myanmar, want an end to the indiscriminate use of the word ‘partner’ when the relationship is really one of subcontracting. Subcontracting can be justified, but the nature of the relationship needs to be clear to both sides. A transparent distinction also needs to be made between an ‘implementing partner’ and a ‘decision-making’ partner.<sup>19</sup> An implementing partner implements an intervention designed by someone else, a decision-making partner is fully involved in the design and management decisions of the intervention.

Globally, and in Myanmar, international agencies come to a country, assess, and decide who they partner with (Myanmar actors become *their* partners, a possessive pronoun that puts the international agency at the center and the apex) and decide when and how to end the collaboration. Evidently, international aid agencies have much to offer in terms of experience and expertise.

Myanmar agencies recognise and wish to benefit from that. But they would not be forced to accept such subordinate position, in their own country, if they were not in need of the funding. The financial dependency can infuse the collaboration with fear on the part of the Myanmar actor: fear to see their funding diminished or

stopped altogether, not only if they are judged not to be performing well, but also if they are too assertive towards their international ‘partner’. They can be empowered, but not towards the international aid agencies? [see GMI July 2021]<sup>20</sup> This does not reflect ‘solidarity’ based on a shared ‘humanity’.

Genuine, decision-making partnership should also be an objective in governance set-ups, e.g. of country-level funds. Myanmar actors cannot remain only in ‘advisory’ roles.

**Not So Equal Partnerships?**

We assess you (due diligence; capacities) more than you can assess us  
 We decide whether you become a partner and when to end the partnership  
 We build your capacity  
 You must comply with our requirements  
 You become *our* partner – not we become your partner  
 You are our ‘implementing’ or our ‘downstream’ partner  
 We have responded to a situation thanks to the network of our partners  
 – not, these Myanmar actors have responded to the situation, and we have supported them in their action

**b) Trust building and relationship management**

Equitable partnership and a modicum of trust will not exist from the first day. Cautionary behaviours on both sides are normal. The key point is whether there is intention to explore the possibility for a trusting relationship. The importance of trust building is gradually being recognised. (see also Connell and Chui 2022:22) Good partnering implies investment of effort into relationship building and relationship management, not just task management. It leads to periodic reviews of how the partnership is going, not only how the project implementation is going. It is an organisational and individual competency, that has

*“Back donors should have more trust in local organisations, but in order to build trust you have to engage and work directly with them. For example, we talk about empowering youth, but then when it comes to hiring, we have a requirement for 2 years of work experience, so there is a discrepancy between the practice and the rhetoric. The same applies to working with local organisations, donors can talk about localisation, but unless they change their requirements to allow more engagement with local organisations, they will not experience what local organisations are truly capable of.”*

National NGO staff

<sup>19</sup> The 2020 Power Awareness Tool, developed by Partos/The Spindle in the Netherlands, provides a simple to use but telling framework to identify who was involved and to what degree in key decisions. Its underlying logic is the same as the decision-making matrix used in HARP-F’s WASH review.

<sup>20</sup> Such fear is justified. In many countries, assertive leaders of national/local CSOs experience backlash from international agencies against themselves or their organisation.

not historically been given much attention in the relief sector.<sup>21</sup> Grant agreements can be complemented or merged with partnership agreements that articulate how the signatories to the contract intend to deal constructively with differences and concerns. (GMI April 2020)

### c) Partnership means shared risk and shared benefits

This principle from the Partnership Brokers Association means that national/local actors collaborating with international aid agencies receive explicit recognition for their roles, contributions, achievements, and innovations. Their names and logos appear in public documents and communications and reports to donors, unless (for security or other reasons) they demand otherwise. It also means that they get correctly funded, in quantity and quality terms (see below), like international agencies.

Risk management is a major concern in the aid sector. One way of reducing certain risks can precisely be the intentional development of trust in the collaboration with Myanmar grantees/partners. The HARP-F experience shows that a quality collaboration, combined with proximity, can be an important risk reduction factor. (see textbox below) The more remote the risk holders are from each other, the more anxious they may be? On the other hand, there is also concern, certainly today, that advancing localisation and giving Myanmar actors greater responsibility would go together with irresponsible transfer of risks when they do not receive the institutional support to manage them. (e.g. A2H 2020; LIFT 2022:4)

The question is how to share risk in practice? This research did not come across examples where this would have been discussed in a structured manner between key stakeholders: Myanmar actor(s), international intermediary/ies and back-donor(s). To make conversations about risk sharing meaningful, they need to be specific: what risk is being considered? Different possible types are health and safety; physical security risks; cyber security risks; legal risks; fiduciary risks; reputational risks; ethical failures risks. (Interaction and Humanitarian Outcomes 2019)<sup>22</sup> Each of these must be examined separately for who is most exposed to it and how, and who will bear what consequences if something goes wrong. Back-donors need to be included.<sup>23</sup> Attempts to reduce the risk for one actor can increase the risk for another.<sup>24</sup> For example, requiring a Myanmar organisation to have a currently valid registration can put them in a difficult and potentially risk situation given the intense political polarisation. Do they register with the National Unity Government, with the SAC, or with both? Either option opens them to accusations of siding with one or the other or of trying to deceive both.<sup>25</sup> Insisting that local organisations produce and submit the normal paperwork around their operations, can put their staff at high risk when they are being searched at check posts.<sup>26</sup> Demanding details of beneficiaries on paper can equally put them at risk. The controversy over

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<sup>21</sup> Several interlocutors for this review, international and national, pointed at a broad difference between international organisations used to partnering and those given to direct delivery. The former are said to be inclined towards collaboration, the latter generally demonstrate a more competitive attitude. That also has implications for the coordination effort. The Partnering Initiative in the UK has developed a framework to assess whether an organisation is fit-for-partnering (no date).

<sup>22</sup> HARP-F's risk register identified six types: context, delivery, safeguarding, operational, fiduciary, and reputational. HARP-F provided training on risk management, and expected that grantees in a remote partnership relation can demonstrate minimum security management procedures for their staff (Remote Partnering Toolkit)

<sup>23</sup> An analysis by the Open Road Alliance of requests for help from social impact organisations found that donor-related obstacles were responsible for 46% of the roadblocks they encountered. (Open Road Alliance 2018)

<sup>24</sup> Attention was also drawn to this point by the ICAI 2016 report (see note 36): "DFID's corporate concern with reputational risks can make staff reluctant to accept fiduciary risk transfer to implementers, which could result in an overly risk-averse approach. DFID does not have a clear understanding of the costs and consequences of transferring risks to partners." [p.39]

<sup>25</sup> Prior to the coup, under the Association Registration Law was not a legal obligation, though some local authorities mistakenly believed it was mandatory.

<sup>26</sup> "Compliance requirements that expose local partners to undue risk should also be reviewed and revised." (LIFT 2022:4) See also Annex 3

Telenor's sharing of user data with the SAC controlled Ministry of Transport and Communications illustrates the point. Encouraging Myanmar organisations to operate at greater scale might not be a good idea if they try to keep a low profile.

More nuanced thinking about risk should also lead to different practices around risk matrices, a common format for recording risk and mitigations that can be useful, but also deceiving, inviting attention only to what has been put into the matrix. In order to work, these matrices must be based on the following:

- They cannot be self-centered. In a genuine partnership, a risk matrix contains not only the risks and mitigation strategies for the international agency but also those for their Myanmar partners.
- Broader unintended but negative consequences must be included. Possible risks in the current Myanmar contexts are e.g. that people in dire need do not receive assistance because available aid is stuck in administrative requirements that are not fit for current circumstances.<sup>27</sup> Another risk is that too large a percentage of the limited aid available is spent on chains of multiple intermediaries, while the Grand Bargain envisages a reduction in transaction costs (2016:5). A third possible risk is that Myanmar civil society in the next two years is dramatically weakened by a major decline in international financial and other support for it. Their organisational survival (or 'business continuity') can be at risk.<sup>28</sup> (RAFT Myanmar 2021c) That could have important negative, longer-lasting, political/governance consequences. Do such risks appear in the current matrices? Along those lines, LIFT identifies following risk: *'Does the activity or initiative fuel negative perceptions of international support for development and humanitarian action? This includes any activities that could lead activists, community leaders or political actors to accuse international agencies of disregarding the preferences, concerns, or aspirations of local people.'* If the answer is yes, the action must be reconsidered. (LIFT 2022:2)
- Risk matrices can usefully be complemented and balanced with opportunity matrices, to avoid an overly anxious mindset. Localisation also offers opportunities. Having on board, as equal partners who bring deep insight and experience from their own environments, as well as connections, commitment, and courage, adds significant strength to the joint effort. There is potential for 'capacity-sharing' if international actors accept they can learn much from them as well. The risk vocabulary and -conversation needs to include the notion of *'risk reward'* – the positive outcomes from having dared to take a (calculated) risk. (Independent Commission for Aid Impact 2016:37) Many Myanmar actors act with a perhaps implicit notion of 'risk reward', though some take very high risks that are not always well calculated and managed.

#### d) The role of intermediary

Internationally, a critical conversation is currently happening on the future role of 'intermediaries'. An 'intermediary' is an entity that acts as 'intermediary/interface' between a back-donor and a national or local

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<sup>27</sup> Failing to adapt when needed is failing to remain relevance, a key evaluation criteria. (OECD 2021a:40)

<sup>28</sup> The internationalisation since 2008 has enabled the rapid expansion and development of many more formalised Myanmar civil society organisations. But this also generated an existential vulnerability with a high dependency on international funding. *"Any cessation of donor funding would likely result in the shutdown of substantial CSO operations as there are few domestic funding sources available."* (Local Resource Center 2018:5) In the current and medium-term future, stresses on Myanmar CSOs and CBOs may come not only from the political and security situation, but also from the combined effect of decreasing ability of ordinary people to make donations and reduced (or administratively hesitating) international aid.

organisation. This can be a UN agency or another multilateral organisation, an INGO or consortium of INGOs, a donor Red Cross society, a country-based fund, a private contractor etc.<sup>29</sup> Some of the questions in this regard are:

- How many intermediaries are there in a funding flow? The Grand Bargain, in its concern to reduce transaction costs, envisaged no more than one.
- How does the intermediary see itself: as just a fund manager or also a relationship manager between the back-donor and the national actor?
- In that relationship management, who does the intermediary give most weight, who is it most aligned with? Who takes the decisions in the intermediary and whose interests are most influential in those decisions? The donor, the national actor, or both?
- What tensions can an intermediary experience, in dealing with at times different understandings, priorities and requirements of both sides? How does the intermediary deal with those?
- What power does the intermediary have in this role of interface? What are its sources? How can that power be used constructively, how can it be abused?
- What are legitimate self-interests of the intermediary, and when does self-interest become questionable?
- Why are there not more national intermediaries, in a fund management role?

This is not an argument against intermediaries and international ones: aid donors will continue to use them. The question is how many there are and particularly how they behave. This research found that the various country funds considered (HARP-F, A2H, LIFT, NRM and MDF) all wanted to be more than a funding instrument. They also consciously try to be a good partner to their grantee. This implies that, when needed, they will argue with their back-donors that certain requirements or political positionings may not be realistic or appropriate in the Myanmar context(s). One for example, significantly reduced several requirements on its grantees in the post-coup situation. It did not ask its back-donors to 'approve' these, but simply to confirm they had 'no objection'. A nuance that seems to make no practical difference but had formal meaning. There is broad recognition in the mentioned country funds that being a good partner requires staff with strong relational skills, not just managerial-technical. It also requires staff time to get to know the grantees/partners, maintain regular communications with them, respond to their needs and requests quickly, help them practically at times e.g. by taking the notes of a verbally shared report or preparing a note for the file on their behalf.

This has implications for how back-donors think about costs-effectiveness of intermediaries. Funding instruments that want to act as good partners need more staff time than those who just decide and manage grants. But as mentioned before and in the next text box on HARP-F, this 'good partnering' offers risk reduction value.

These country funds provide grants to international agencies who in turn subgrant to Myanmar actors. Several of the country funds pay attention to the international intermediaries providing the Myanmar subgrantee with a management fee (and even put this in the contract) and exercising duty of care notably relating to health and security. Some chose not to fund an INGO with Myanmar partners if the INGO's share of the project budget is over 50%. But generally, they do not exercise broader oversight on whether this second tier of intermediaries (INGOs, UN agencies) act like a good partner.

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<sup>29</sup> 2021 ongoing: Grand Bargain Political Caucus on the Role of Intermediaries in Support of Locally Led Action; HAG et al 2021; A4EP 2022. The term 'intermediary' is also used in the evaluation of 'HARP-F's Approach to Remote Partnership in Myanmar'.

In Myanmar, some donors already provided larger grants (well over a million US\$) to some, typically bigger and well developed, Myanmar CSOs who then subgrant. There are also already experiences of Myanmar actors acting as national fund managers i.e. national intermediaries. The Local Resource Centre has been doing so for years and was given a financial envelope by A2H to provide COVID-response grants to its network of CSOs and CBOs. Also the Metta Foundation will be acting as national grant manager.



### HARP-F, good partnership and trust building as risk management approach

By the end of 2021, when HARP-F significantly reduced grant making, it had provided a total of 76 grants to 55 agencies.

HARP-F's practice on one level remains a traditional one: An agency becomes a 'partner' when it receives HARP-F funding. The centrality of funding in shaping the perception of the relationship is also revealed by the use of the term '*downstream partner*' (including in its Remote Partnering Toolkit). They are only downstream from a money flow perspective. From a true localisation perspective, the local actors and their agency would be the source. Traditional thinking also shows when HARP-F speaks about *its* network of partners that allowed it to respond rapidly to many situations in part of Myanmar. This is also noticeable in the evaluation of HARP-F's COVID-19 response, which rightly talks about an 'ecosystem based upon shared values and a common vision' [p.i] but does not question the network being centered around HARP-F. Networks, coalitions and consortia can offer great value in terms of increased reach, greater complementarities etc., from a localisation perspective, their true axis should be between national and local actors, not centered and dependent on an international agency.

However, HARP-F staff and, more importantly, Myanmar CSOs which received funding from HARP-F testify to the general attention to the quality of the relationship and the trust that resulted from it. [see e.g. HARP-F COVID-19 Response Evaluation 2021 p. G] It led to a situation where there was constant, proactive, open and transparent conversation between both sides, where emerging problems could be flagged up early, as the general attitude was to see, together, how they could best be addressed. With HARP-F staff ready to help where needed. Myanmar CSOs repeatedly commented on the constructive attitudes of HARP-F staff, which they found positively different from many of their dealings with international organisations. While the term '*decision-making partner*' is not used, the evaluation of HARP-F's approach to remote partnering found that 72.7% of survey respondents indicated that at least some decisions on remote management were taken in consultation with HARP-F. [p.16] That did not mean HARP-F was able or willing to waive all requirements – nonnegotiable minimum requirements were set out and clear to all from the outset.

*This relational, intentional approach is unusual and greatly valued by EG grantees. Those we interviewed spoke highly of the process and greatly appreciate the trust which is placed in them. They describe HARP-F, particularly the regional staff who are critical to capacity building efforts, as approachable, good at listening, committed and 'not bossy', in contrast to other donors / agencies, and one even described the approach as a 'transfer of power', illustrating the power dynamics prevalent in the humanitarian system. Regional staff's mentoring and coaching is also felt to be knowledgeable and supportive. The approach has yielded fruit, seen for example in the quick, grass-roots COVID-19 response." [Mid-Term Review 2020:16]*

In short, HARP-F did not see itself just as a funding instrument of FCDO, it also sought to be a good partner.

Two key factors in developing such quality relationships were the interpersonal skills of HARP-F staff and associates and proximity. The two regional offices HARP-F ran in 2019 and 2020, in Rakhine and Kachin States, meant that HARP-F staff were able to follow very closely the contextual developments, regularly connect with people in 'partner' organisations, and provide hands-on support, advice and accompaniment, when needed. Investing staff time in relationship building and -management could be considered an extra cost and therefore frowned upon. Yet research on the importance of trust in society indicates clearly that high levels of trust significantly reduce the overall cost of transactions.

Relationship- and trust building was part of HARP-F's risk management approach: "*We did not in practice absorb a higher level of risk as the good relationship meant that we would be told, early on, what was going on.*" [HARP-F staff]

A general hypothesis can be put on the table here: The more remote a responsibility holder and decision-maker is from the situation on the ground and the actors it is working with, the higher the likelihood that person will see greater risk and show greater distrust. This could be examined in a further version of the Remote Partnering Toolkit.

Whereas HARP-F actively attended to the quality of relationship with Myanmar CSOs it funded directly, with one exception [DCA] it did not pay such active attention to how the INGOs it funded behaved with their Myanmar 'partners' in general. With the INGOs the focus was on delivery, though HARP-F staff did draw attention at times to the importance of NPAC for Myanmar agencies, and duty of care requirements also towards 'partners'. It emphasises this also in its Remote Partnering Toolkit.

Given the current situation in Myanmar, HARP-F's Remote Partnering Toolkit also reflects on possible adjustments in the 'partner selection' [i.e. grantee selection] process. It recognises that an open call to proposals may create risks, that the expectations may have to be limited to life saving and not 'sustainability' and 'impact', and that the selection may take into account the concern not to be perceived as 'on one side of the conflict or another'.

*Recommendation 6 to international actors: Be transparent about the true nature of the collaborative relationship and use the term 'partnership' for a high quality one. Intentionally invest in relationship- and trust building. That requires relational skills and staff time investment but offers gains in shared ownership and shared responsibility and facilitates capacity-sharing. Time frame for action: short to medium-term (3-9 months)*

*Recommendation 7 to international actors: Enter the strategic risks of not supporting Myanmar actors, or not as much as possible, into the risk matrices. Secondly, bring back-donors, international operators and Myanmar actors together for focused discussions about particular types of risk, who is most exposed to them, and what risk sharing means for each, in practice. Recognise that strong and mutually respectful relationships reduce certain risks. Thirdly, complement risk anxieties with opportunity-spotting: working closely with Myanmar actors creates opportunities. Risk reward: the benefits of having taken a (considered) risk needs to be part of the vocabulary and mindset. Time frame for action: short to medium term (3-9 months)*

## 2. Funding Myanmar Actors: Financing Localisation: The Grand Bargain commitment

### a) The Grand Bargain commitment

Best known of the Grand Bargain commitment to localisation is the aggregate target of 25% of available funding going to national actors, together with the encouragement to make more use of pooled funds which can be easier to access for national actors. Less remembered is the guidance to 'increase and support multi-year investment in the institutional capacities of local and national responders', a lessening of their administrative burdens and a reduction in transaction costs. (Grand Bargain 2016:5) Investing in institutional development of organisations is nothing new for aid donors – they have supported the institutional development of international aid agencies (singly and in coalitions and alliances) for decades. The reduction in transaction costs refers us back to the question of 'why localisation' and the layers and roles of intermediaries.

### b) Considerations at play

Decisions to fund Myanmar organisations, directly or indirectly, are influenced by certain considerations which can be explicit or implicit:

- *Direct funding or not?* We can adopt a maximalist or gradualist position. The maximalist position holds that Myanmar organisations cannot receive any direct funding unless they are able to meet the integrity, quality and accountability requirements that international agencies are perceived to offer. That would likely lead to very few being funded directly, who happen to have received investment for organisational development (OD) for some years, as international agencies did. How others can reach these standards without similar OD investment (rather than project-based capacity-support) remains an unanswered question. A gradualist approach will begin to fund Myanmar actors directly even if they do not now meet all these international standards, but work with them to gradually develop those. This has direct implications for how due diligence assessments are used in funding decisions. From a maximalist position, an organisation may be refused funding because it has no written policies on e.g. fraud and corruption, safeguarding more generally and child protection in particular, human resources management, ethics etc. From a gradualist position, such organisation may still be able to receive certain funding, during which it will start developing these policies, and own them internally.<sup>30</sup> Some donors lead towards the maximalist approach, others, like e.g. HARP-F, A2H and LIFT towards the gradualist. The gradualist approach can lead to the creation of grant pots exclusively for Myanmar organisations. HARP-F did

<sup>30</sup> The internal ownership is important: Organisations rapidly putting policy papers together by cutting and pasting from others or samples, means the due diligence box can be ticked, but the policies will not be lived.

so with its ‘enabling grants’, and A2H with its ‘Collective Voices’ fund. Starting out as smaller grants, this will require some more staff capacity in the fund to handle.

- *Organisational survival or delivery?* Two choices are possible regarding the dilemma of underfunded appeals. First, there is a view that investing in the organisational capabilities of Myanmar actors is not a good use of the limited funds available. Second, others might argue that this will continue to be a protracted crisis and many responses rely on Myanmar actors, so we need to ensure the organisational/associational survival of at least enough of them if we want to have continued delivery capabilities but also an ongoing force for peace and democratisation in the country. The first position is not defensible if it does not also push for a reduction in the higher costs of international organisations and remains silent about its contribution to the weakening of a Myanmar civil society.<sup>31</sup>

### c) The quality of funding

For any organisation, the quality of funding is as important as the quantity.<sup>32</sup> Quality of funding refers to factors such as predictability of income, flexibility (unearmarked), regularity of cash flow (e.g. by providing an installment upfront), having all costs covered etc. Diversity of income sources can be a factor reducing the risk of cash flow interruptions but does not automatically mean better quality finance. The ability to develop an organisation depends more on the quality than the quantity of its finance. Two key attention points here are the management fee and multi-year funding.

*Management fee:* Various referred to as Internal Cost Recovery (ICR), Non-Project Attributable Costs (NPAC) etc., this refers to a percentage of the budget to cover management costs, that should be unearmarked. International agencies habitually get such. Not providing any to Myanmar subgrantees, invalidates the claim of ‘partnership’, keeps them in a ‘starvation cycle’ (Boyes-Watson et al 2022) and risks being a form of exploitation as ‘cheap labour’. One international intermediary, receiving funding from different donors and supporting a good number of Myanmar CSOs, has different practices regarding core costs, in the first place determined by donor practices, but secondly also by local agency preferences. They can be: Both the intermediary and local CSO share the ICR or NCAP; the local agency gets itemised and earmarked coverage for core costs; a mix of flexible and itemised cost coverage; or the full ICR/NCAP goes to the local agency when the international intermediary has its core costs covered from other donors. Such willingness to share or pass on the ICR or NCAP cannot be taken for granted however, as it is also an important source of flexible income for the international agency.

*« Our finance staff worked together with a long-standing and strong Myanmar partner CSO to co-design a ‘cost allocation policy’, with enough possible line items that de facto they have flexibility how they allocated part of the budget for organisational support costs. But we haven’t done this with all our partners. And it is an issue of ongoing discussion with the finance and admin colleagues in our international headquarters, who want us to keep as much of the money as possible. »* Senior international staff of INGO

That is why, as mentioned before, donors need to make this mandatory and keep an eye on intermediary practices also in this regard. (see Desmond et al 2019 for the results of a LIFT commissioned survey)

<sup>31</sup> The OECD encourages investment in an independent civil society, which implies ‘the availability and accessibility of direct, flexible, and predictable support including core and/or programme-based support, to enhance their financial independence, sustainability, and local ownership’ (OECD 2021b:point 4a)

<sup>32</sup> To the survey question: *Do you think that local and national organisations are receiving a fair proportion of funding during the COVID-19 response compared to international actors?* The scaled answers were 20% of international respondents and 18% of Myanmar ones chose ‘all the time or mostly’; 21% of international respondents and 12% of Myanmar ones chose ‘sometimes’; 59% of international respondents and 70% of Myanmar ones chose ‘rarely or never’. (Humanitarian Advisory Group et al 2020)

*Multi-year funding (MYF):* This is an important form of quality funding, though a distinction needs to be made between multi-year project (or programme) funding and multi-year unrestricted (or 'core') funding.<sup>33</sup> MYF means the organisation does not have to spend constant energy on chasing the next grant and can more easily attract and keep experienced staff. At the operational level, it has the potential to enable an agency to establish itself better in a context, thereby improving its contextual analysis and understanding of the socio-political and economic dynamics within and between social groups, their vulnerabilities and capabilities; develop a broader network of good relationships; practice more participatory approaches with forms of community-monitoring and with shared accountabilities; learn from its intervention experiences and improve its relevance and quality. [see e.g. The Operations Partnership 2021 for MYF and WASH in Myanmar] MYF for institutional development enables a sustained improvement in standards of integrity, quality and accountability, but also greater impact. [e.g. Laudes Foundation et al 2020; McLead 2021]<sup>34</sup> These benefits do not materialise automatically – such ambitions need to be discussed upfront and can be part of the grant – and partnership agreement.<sup>35</sup>

### **Multi-Year Funding**

An underlying issue is what perspective one holds on protracted (and recurrent) crisis. Does humanitarian aid remain a by nature short-term emergency response, as some donors continue to do, or do you take a longer-term resilience perspective, both for populations-at-risk and national/local actors that will support them?

At institutional level, this can be determined by the life span of a funding instrument. Like HARP-F, several of the other funding instruments in Myanmar cannot allocate longer term funding beyond their own life span. As they approach their end date, that horizon shortens. Even if they still have life expectancy ahead, their ability to allocate MYF depends on how their back donors replenish them: if that is only an annual basis, then again they are constrained to go beyond longer funding commitments.

The different country funds in Myanmar are aware of the value of MYF. In recent years (COVID, coup) there has been a tendency to give out somewhat shorter-term grants (6-12 months), as the situation was very volatile. Now there is a tendency to look again at longer term funding commitments (2, perhaps 3 years), the funds life expectancy permitting. Inevitably, as situational developments remain unpredictable, this cannot be accompanied by detailed planning over such period. That can be handled by a longer-term commitment, more detailed objectives of which are agreed on an annual or even semester basis.

3 x 1 does not equal 1 x 3: The quality aspect of multi-year funding, is the upfront assurance, that allows operators to plan and act with a longer-time perspective. Receiving three years in a row annual funding, with each time uncertainty in between, does not have the same value as a grant with a 3-year time horizon.

Strategic localisation requires a longer-time perspective, the development of strategic partnerships but also longer-term investment, including financially. It is eminently justified in areas suffering protracted crisis or vulnerable to recurrent crises – both of which apply to Myanmar.

These considerations also invite a nuanced reflection on value-for-money. See annex 5 for inspiration.

<sup>33</sup> See also LINC, Peace Direct et al 2018

<sup>34</sup> A2H for one recognises the importance of institutional funding, but the challenge is to convince its back-donors

<sup>35</sup> Levine et al 2019:3-4



### HARP-F and financing for localisation

Over its lifespan, HARP-F provided 76 grants to 56 grantees. 25 of these grantees were international and 31 Myanmar actors. Of the 76 grants, 36 went to international agencies and 40 to Myanmar ones. According to HARP-F, 33% or about £ 23 million of its overall grant expenditure since 2016 has gone, directly or indirectly, to Myanmar agencies.<sup>1</sup>

Part of that was direct funding, notably in the shape of 'enabling grants' to 17 Myanmar CSOs in 2019-2020 in Rakhine and Kachin States. Several of these were smaller ones, not prior recipients of HARP-F funding, and had never received direct funding before. Enabling grants varied from 6 months to 2 years. The maximum ceiling was £ 300,000; the total value of these enabling grants £ 3.1 million. (Mid-Term Review 2020:15) Though an enabling grant may have looked modest (e.g. £ 60,000), it could be a significant leap for an organisation that before had received never more than perhaps £ 10,000. Enabling grants were project-based, to support humanitarian services in conflict affected communities and others at risk of natural disasters. They did however include a regular management fee (ICR/NCAP) and came together with intensive capacity-support mostly from HARP-F staff and associates themselves. HARP-F was also attentive to avoiding cash flow gaps. A few Myanmar CSOs also received small grants for an 'innovation'. Some of the 17 recipients of an enabling grant subsequently received other grants from a Rapid Response Fund, while three (Nyein Foundation, Center for Social Integrity and KMSS) could subsequently access HARP-F's 'delivery grants'. The 'delivery grants' could be for much higher amounts and prior to that only went to INGOs. The direct funding to KMSS involved a significant process of Trocaire reviewing its roles with that of funding intermediary no longer needed. HARP-F obviously did not manage that whole process, but it did encourage it and was actively involved in the restructuring of roles and relationships while activities were ongoing. (see KMSS et al 2019-2020)

A draft learning report on the enabling grants, looking particularly at those provided to disaster risk reduction to Rakhine organisations, observes that *'The overall success of the Enabling Grant funded projects is high with over 75% activity completion, considering half of the project period was interrupted by COVID-19 and conflict outbreaks. In addition to activity completion, the level of achieving project goals and objectives [is also] providing professional satisfaction, prompting motivation and confidence to the CSO partners to initiate more projects in future'*. (Myat Htet Aung Min 2021). The observations confirm the priority given to the project objective of these grants, but also appreciates the positive influence on confidence and motivation – important factors for the vitality of an organisation.

Another distinctive feature of HARP-F is its willingness to provide multi-year funding. These enabling grants could be up to two years. Longer multi-year funding (3 years) was provided to some INGOs, such as Oxfam for WASH work in Rakhine State and to Mercy Corps for cash programming. Various INGO and Myanmar CSO actors have commented on the value of multi-year funding. Energies otherwise spent on chasing new income can be devoted to the actual work; core staff have a bit more job security and are less pressured to be looking for a job elsewhere; time can be invested in accessing harder-to-reach populations and/or in getting to know them better, including their internal social dynamics and -capacities. The prospect of a longer relationship is an incentive to invest in developing a better-quality relationship and allowing it to evolve towards joint decision-making etc. Such benefits of multi-year funding have also been documented by the WASH review. (PDF)

While HARP-F only provided project funding, during the same period DFID/FCDO provided core funding to about 10 Myanmar CSOs. Core funding over a few years, as mentioned enables organisations to invest in their overall development which eventually translates in greater impact.

In mid-2020, questions were raised in HARP-F's annual review about the transaction costs of such small grants' scheme and intensive support to smaller and more local CSOs, and the strategic priorities in a changing environment, including the COVID pandemic. As a result, enabling grants and the HARP-F regional offices in Kachin and Rakhine were not continued in 2021. This also needs to be understood in a context of HARP-F's planned closure in 2022. But it is also indicative of the perceived dilemmas between delivery and investing in capacities, and between small scale and large scale.



#### d) Adaptive management

The COVID situation and even more so the February 2021 coup demanded adaptations from all aid actors in Myanmar. The key question is: Are you institutionally ready-for-adaptation? This research could not review all these adaptations but offers an initial review under the headings of suspend, extend, respond, adjust.

*Suspend:* Several ongoing development and peace interventions were suspended, sometimes because they involved too close collaboration with government institutions now controlled by the SAC, because of insecurity or, for now, reduced relevance.

*Extend:* For projects or interventions that could continue, one or more extensions were provided, beyond what existing policies normally allowed, for implementation and/or for the reporting.

*Respond:* New grants were made from some existing rapid response funds, and/or existing grants already included an unearmarked budget line for contingencies, that could be used by the grantee and if needed topped up. Such budget line may have come together with training on 'disaster preparedness', as HARP-F provided e.g. to some Rakhine actors. A critical issue here is who has the decision-making authority and how fast decisions can be taken? Is the local actor trusted to do the right thing fast, or must a shorter or longer proposal be submitted for approval by one or more other decision-makers first? In the latter case, speed may be compromised.<sup>36</sup> In this perspective, responding to an acute emergency is an addition to an ongoing programme. The next text box summarises HARP-F practices.

#### HARP-F, Crisis Response and Adaptive Management

The HARP-Facility used three general and one specific approaches.

- Including a budget line for emergency responses in project budgets. If needed, this could be topped up fast.
- Releasing additional grants from a Rapid Response Funds.
- Enabling more extensive project or programme adaptations.
- The strategic decision to fund Community Partners International (CPI) purely for emergency response, leveraging its extensive network of local partners across Myanmar, with sub-grants agreed quickly on a case-by-case basis. This decision enabled timely and needs-based crisis responses during both Covid-19 and the post-coup periods.

The COVID situation was evidently one that required efficient adaptive management, the post-coup situation has pressed its necessity even more. The evaluation of HARP-F's response to COVID-19 identifies preparedness, with clear guidance available early on, detailing the processes, formats, and parameters to request more substantive changes, as one enabling factor. Others were the prior existence of relationship with a high degree of trust, and the rapid, active, formal, and informal (via phone, social media etc.) communications that led to decisions. Informal communications and -decisions did not replace formal ones – they assured that timely action was not held up by paperwork that could follow afterwards. HARP-F remained purpose-focused i.e. responding to needs, not form-focused i.e. prioritising the paper formalities. (The Operations Partnership 2022:19)

By comparison, HARP-F's paperwork was seen by its grantees as less burdensome as that of other donors, one of them being the Myanmar Humanitarian Fund, although staffing numbers may also be one factor here. Where additional funding was agreed, HARP-F funding typically took no longer than five days to transfer, giving grantees the confidence to start using other funds for rapid response. (Evaluation report 2021:9-13). In response to a survey question, 90% of respondents rated the effectiveness of HARP-F's adaptations 'good' or 'very good'. (The Operations Partnership 2022:14)

Noteworthy is that grantees/partners valued HARP-F providing them with a bigger picture, that enabled them to take a more strategic perspective.

<sup>36</sup> For the issue of who decides, see e.g. the evaluation of such emergency response budget lines ['crisis modifier'] by Somali partners of the Dutch Relief Alliance by Harrity, R. 2020

At least one international donor, specialised in emergency response, has devoted the past year to setting up a structured response mechanism that should deliver a complete package of basic services to similar standards everywhere. That is now almost ready to be activated, through one or more consortia led by an international aid agency which has the responsibility to manage integrity, quality and accountability, and develop the capacities of its Myanmar subgrantees.

*Adjust:* But more profound adjustments may be required, in the nature of the programming and management requirements, and -possibly- in the expectations of programming meeting high quality standards. Note that according to the OECD, adaptability to remain relevant is an indicator of efficient management. (OECD 2021:40-41) Some Myanmar funds, like HARP-F, have detailed guidance for adaptations, sometimes already developed during the pre-coup COVID period and effectively communicated to their grantees. Others now have clearer guidance, but it is not yet understood by all their grantees, particularly those they have not been able to meet in person for a long time. By and large, these funds seek to lighten to paper burden on those operating in difficult and at times very dangerous circumstances. Other donors however still have a very demanding and slow bureaucratic process to approve adaptations – to the point that one agency interviewed for this research said it had decided to no longer to seek funding from such a donor.<sup>37</sup>

The next text box illustrates some of the issues and provides examples of some adaptations, made by some donors or country funds, not by all. The subsequent text box focuses specifically on the issue of registration.

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<sup>37</sup> Recognising the inevitability of adaptive management in volatile contexts, DFID and USAID in 2018 set up the Global Learning on Adaptive Management Initiative [GLAM]. It seeks to clarify why adaptive management is needed; how you do it in practice; what makes the difference between smart adaptive management or '*adaptive rigour*' and poor planning and random reactions to events; what monitoring, review, and evaluation mean in a context of adaptive management; and accountability. See e.g. Bryant and Carter 2018 and Laws and Valters 2021

## ISSUES DEMANDING ADAPTATION

*New partners.* For several donors or funding mechanisms, the approval of new agencies to directly fund is demanding and time consuming. But they are fine with their international or national intermediary taking on new ones. If due diligence assessments are part of the delay, why not adopt the 'due diligence passporting', proposed by the Start Network in 2017 already: accept a solid assessment by another international actor rather than each international actor time and again assessing the same elements individually.

*Proposals:* For some, existing strategic partners that are well known and trusted, can do with a short concept paper. Other donors or country funds may issue new grants via a call-for-proposals, knowing that in the current circumstances it may not be realistic to ask for high quality assessments (e.g. of needs and markets), and set too fixed objectives. Some accept proposals in Burmese language, certainly for funds dedicated to Myanmar CSOs, but others still need them in English if the institutional decision-making is not fully devolved. Insistence on proposals and/or reports in English is an obstacle to localisation.

*Finance:* Some agencies do not want to operate a bank account that can be controlled or monitored by the SAC. Those who can have opened an organisational or personal bank account in a neighbouring country and then transfer money via the informal hundi system (a network of private operators where money is deposited at one point of the network and the sum minus transaction costs can be picked up by someone else in Myanmar. Aid agencies have used it also in Somalia and Afghanistan). A private bank account of a senior staff can also be used in Myanmar. Some donors, after vetting, accept private bank accounts and/or the hundi system, others do not. The (crossborder) hundi-system does not reach across the whole Myanmar territory however. Since the coup, the cost of accessing cash has increased significantly – some donors have made this an allowable expense (i.e. project cost) others not, in which case the grantee needs to cover this from its management fee, which was not the purpose. Given the inflation, some donors provide their grantees with Myanmar Khat at the official UN exchange rates. Some also systematically insert in their grants a budget line for safety and security.

*Procurement:* For several of the funds/donors spoken with, this remains a point that demands more flexibility from back-donors or headquarters: the requirement of three independent quotes can simply not be realistic and become even more of an obstacle if applicable from a lower ceiling of cost. In various areas there simply may not be three reliable suppliers who actually have the supplies. One donor also does not want procurement from vendors that are part of military's economic ventures, which may further reduce the options. In addition, vendors may be unwilling to provide written quotes, as this can lead to accusations by SAC-associated forces that they support the opposition.

*Monitoring and reporting data:* Several donors accept that realistically only output data can be expected, not outcome or impact ones. They no longer demand details (and even signatures) of beneficiaries. Information can be photographed and scanned into the cloud or forwarded on a USB stick, and the originals destroyed. Asking and receiving less data is a bigger adjustment for habitually data-rich sectors such as health and nutrition. Selective calls with beneficiaries, third party monitoring and peer monitoring are being tested.

*Providing other means of communication:* Given the ability of the SAC to monitor and restrict internet and mobile phone use, one INGO interviewed raised the issue of providing certain Myanmar actors with alternative communication means, such as satphones. This could expose the Myanmar actor to being seen as a member of the armed opposition, so that the risk needs to be thoroughly discussed with them.

*Branding and visibility:* Several donors understand that visibility, certainly for many Myanmar CSOs, can put them at risk. Their own visible association with actions in non-government-controlled areas can also eventually anger the SAC. The FCDO has commissioned a review of what can be learned from low profile/invisible aid operation in other countries.

*Quality standards:* The above are examples to simplify legal and administrative requirements to a minimum deemed necessary. In anticipation of future audits, care is taken that for every instance where a 'normal' requirement is not met, there is a note in the file. Obviously, this carries certain risks related to oversight and accountability to taxpayers. But it also carries opportunities: Without such reduced administration burdens, several organisations are still able to operate somewhat would not be eligible for funding, and needs would remain unmet. As one funder representative put it: "Myanmar actors try to respond and respond fast. We should not tie a rope around their legs with our procedures and requirements." A more difficult issue is how much international actors are willing to accept compromise on technical standards in sectors like health, nutrition, WASH, cash programming, shelter etc.? In many areas, international agencies need Myanmar actors to get access. Several of the actual responders do not have the technical expertise to meet international standards, although they do understand food, water, shelter and aspects of health in their own environments. They have had to deal with this for decades without (much) international assistance. While consistently meeting high international standards must remain the aspiration, in practice, it does not seem realistic to believe these capabilities can be built rapidly in many more Myanmar agencies, particularly if they do not get the funding to gain more financial stability and retain such capacities.

### The Registration Question

Is an active formal registration with the authorities a requirement to be eligible for funding?

What is the purpose of demanding a registration? To ensure that the Myanmar agency has a formal authority to exist and operate? If so, who is the legitimate authority? The SAC or the NUG? Some funders in Myanmar are actively exploring the possibility of the NUG registering Myanmar organisations, even some EAOs for organisations mostly operating in the territory they control. Demanding that the Myanmar actor is registered with the SAC is a political act: it legitimizes the SAC. Can a Myanmar organisation be registered with the SAC and NUG? That can carry benefits but also risks for them – and so must be discussed with them.

Is it to ensure the organisation exists as a legal entity so that it can be taken to court if required? Which court would it realistically be taken to: a court in Myanmar, a court in Europe or North America?

Several funders in Myanmar have not been insistent on it and accepted a claim that the registration was being pursued or in process. So far, several Myanmar CSOs have been able to continue operating without active registration.

There can be a pragmatic reason: Without valid registration a Myanmar CSO cannot operate a bank account and therefore not receive nor transfer funds. For those who cannot operate a bank account in a neighbouring country, some funders are exploring alternatives e.g. using the bank account of another registered entity which then could provide funds to the Myanmar CSOs. From the perspective of the Myanmar CSO, this can pose a risk: can they trust that this intermediary will not provide information to the SAC, e.g. when put under pressure?

The whole situation may become more difficult with a new Registration Act in the making. It may force Myanmar CSOs and international agencies not only to register with the SAC but to also provide more information on their actions, target groups and beneficiaries. This can become a stronger clamp down on civil society as a whole, not just activists. It will present everyone with tough choices. . That said, however, one interpretation of the current situation is that the 2008 Myanmar Constitution was nullified at the onset of the coup, and that the 2015 Association Registration Law, and any new laws, technically have no jurisdiction.

### e) Situational updates for rapid response and adaptive management

Where adaptations are driven by contextual developments, situational updates are needed for the decision-making of the operating agency and the grant manager.

This requires a refinement of the notion of monitoring. Use of the general term, including in HARP-F documentation, does not differentiate between the many different relevant issues that in principle all should be monitored: the evolving political and security conditions and their impacts on procurement, mobility, access; the changing displacement and evolving needs of different affected social groups; the progress (inputs and outputs) and integrity (no fraud, corruption, abuses of power etc.) of the planned intervention; and the outcomes (intended but also unintended) of the intervention. A second issue is how much of the donor's need for good situational updates is put on national/local agencies to provide, and if they are asked to contribute to this, do they get the resources to dedicate staff time to this? If not, national/local agencies are used as free service providers for international agencies.<sup>38</sup> The following text box summarises the findings from the review of the Community Analysis and Support System, set up and managed by COAR on behalf of HARP-F since mid-2019. (Trias Consult 2022)

<sup>38</sup> One country level fund set up a network of 'community listeners' – well chosen and trained local people who have regular conversations with key figures in the 'community', to monitor the priority concerns but also actions taken to address them.

### HARP-F and situational updates to inform action

In mid-2019 HARP-F commissioned the Center for Operational Analysis and Research (COAR) to set up a Community Analysis and Support System (CASS) to provide contextual and operational analysis. Its first focus was Rakhine State, subsequently extended to Kachin and Shan States and some other areas of HARP-F intervention. CASS products consisted of weekly updates, flash reports and thematic research. They were meant to serve not only HARP-F and FCDO but to contribute to wider knowledge and decision-making of humanitarian actors in Myanmar. From the perspective of supporting and reinforcing Myanmar actors, the questions are

- Does the information collection put a burden on Myanmar agencies (CSO/CSO) for which they were not compensated? Did it risk putting affected people at risk?
- Is the information and analysis accessible and useful for Myanmar agencies and affected populations?

As CASS operated with its own resources and did not ask HARP-F grant recipients to collect information on its behalf, it did not add a data providing burden onto them. The CASS products were highly appreciated by international agency users, even more so after the 2021 coup when the situation became more fluid in various areas and access even more difficult. Users in Rakhine confirmed that CASS products were used in coordination and programmatic adaptations, sometimes in relation to post-coup conditions [e.g. mechanisms for informal cash transfers]. Myanmar organisations as a whole, and in Kachin and Shan State in particular, used them much less as they relied on existing sources and information channels, in their own languages. [CASS Review 2022: executive summary]

On the other hand, certainly with the outbreak of COVID-19 requiring significant adjustments in planned activities, HARP-F itself very regularly provided FCDO with situational updates. This was partially justifiable as it covered Kachin and northern Shan State when CASS did not and brought up issues from a community perspective not always identified by CASS. But it did require significant time investment from HARP-F, and to a degree also from its many partners involved in the COVID response. [Interviews for this research]

*Recommendation 8 to back-donors: Ensure the organisational business continuity of enough Myanmar actors in all parts of the country. Without them many people in need will not be reachable and a Myanmar civil society already under pressure from the SAC will be further weakened, with negative consequences for future prospects for democratisation and peace. Time frame for action: short to medium-term (3-6 months)*

*Recommendation 9 to back-donors: Ensure that the international and Myanmar intermediaries receive quality funding and monitor that they pass it on to their subgrantees. The quality of funding is as or even more important to organisational and programmatic effectiveness as the quantity. It is also critical for institutionalised capacity-development. This includes core costs covered, multi-year funding, measures to prevent cash flow problems and some flexible funding. Time frame for action: medium-term (starting six months from now)*

*Recommendation 10 to back-donors: Adopt a gradualist, not a maximalist approach to direct funding of more Myanmar agencies. This starts out with small grants combined with the support to develop the organisational policies and programmatic expertise where needed. As progress occurs, and trust develops in the relationship, the grants can become larger. When unable to manage this directly, contribute to pooled funds that are also acting as good partners to Myanmar organisations, or rely also on other international and Myanmar intermediaries with strong partnering ethics and who and intentionally work towards role and responsibilities shifts over time as part of a deliberate localisation strategy. This requires more staff-time from intermediaries but is also appropriate to the context as the difficult operating conditions in Myanmar today are not favourable for rapid spending of large sums. Time frame for action: medium-term (start within six months)*



*Recommendation 11 to back-donors and international intermediaries: Do not insist on Myanmar CSOs having an up-to-date registration with the SAC regime. In practice, it does not offer any real guarantees and risk reductions for international aid agencies, while it is likely to significantly reduce their independence and can put them and those they support at risk. This is part of the risks and risk sharing conversations between key actors and must ultimately be the decision of the Myanmar actor. Politically, the NUG has a greater claim to being the legitimate authority than the SAC, so the eye can be on registration with the NUG or possibly with both sides (as at least one Myanmar CSO seems to have done). Time frame for action: short term (within three months)*

*Recommendation 12 to back-donors and international/Myanmar intermediaries: Mainstream adaptive management: Volatility and unpredictability are the 'normal' in many parts of Myanmar today. Back-donors cannot insist on overly detailed plans or expect guaranteed results and need to have administrative and decision-processes in place that allow potentially significant adaptations (beyond a % flexibility around budget lines) to an intervention to be reviewed and decided on fast and without excessive paperwork. Timely adaptations can be measures to maintain relevance, efficiency and effectiveness – all important OECD evaluation criteria. The possibility of adaptive management needs to be written into contracts – and intermediaries need to extend this further to their subgrantees. Time frame for action: medium to longer term (12-18 months)*

*Recommendation 13 to back-donors and international/Myanmar intermediaries: Reduce administrative requirements and be creative in finding practical solutions to real world operational constraints and problems for operators in Myanmar today. The consequence of not doing so is to delay or altogether stop funding from reaching the frontline responders, to the detriment of people already facing multiple insecurities. This may imply: Reducing proposal and reporting requirements to the minimum needed (and preferably acceptable also in Burmese) and actively supporting Myanmar actors when needed; after vetting accepting alternative financing channels where required; raising the ceiling for when three procurement quotes are required; accepting that less monitoring data will be available for practical and security reasons and be creative on getting some third party verification; reducing or even cancelling branding and visibility requirements. At times it will also imply accepting that lesser quality of services and goods are better than none at all because international standards cannot be met. Time frame for action: short- to medium term (three to six months)*

*Recommendation 14 to back-donors and international/Myanmar intermediaries: Do not overburden Myanmar actors with information requests or provide them with the additional staff to respond to them. The lack of access and the reduced ability to assess situational developments understandably creates unease for those who are more remote but need to make decisions. It is not correct to burden Myanmar actors with data and information requests without providing them with the additional resources to do so. Independent and dedicated services can avoid this, if in practice they do not still rely heavily on the Myanmar actors on the spot to get the information they seek.*

### 3. Myanmar Actor Capabilities – and the Capability to Play a Reinforcing Role

#### a) Traditional capacity-development in the international relief sector

Supporting capabilities development is a generally poor performance area of the international relief sector. The weaknesses are well known:

- A lack of appreciation for existing capabilities some of which, like commitment, courage and stamina, strong relationships of acceptance and trust with various communities/social groups, or the ability to navigate complex political challenges do not habitually figure on the 'capacity

assessment' sheets of international agencies. Deficit thinking rather than appreciative inquiry attitudes tend to shape many capacity-assessments.<sup>39</sup> National and local agencies find that international agencies do not recognise, or underestimate, capabilities that are important for achieving objectives, and that the language [and mindset] need to change from one way 'capacity-building' to 'capacity-sharing'.

- *Non-distinction between competencies of an individual, and institutionalised organisational capabilities:* Training individuals does not automatically lead to stronger organisational capabilities.
- *Experiential, not classroom learning:* Training courses need to include experiential and applied learning – which becomes more difficult when they happen online. Even then, the availability of one or more resource people to mentor and accompany learners when they put their new learning into practice, is often critical.
- *The absence of a broader organisational development framework.* Most capacity-support offered prioritises the ability to meet donor requirements and to run projects and programmes with good enough quality and accountability. That leads to technical support and training on certain topics such as internal policies that international actors now want to see, financial, procurement and human resources management, and proposal and report writing. Another training domain may focus on minimum standards in different sectoral and thematic areas, and good monitoring practices (often experienced primarily to meet donor requirements rather than as an essential internal management and learning practice). Highly relevant as all of this is, it rarely happens within a broader holistic and contextual perspective of what an organisation in Myanmar needs to be healthy, sustainable, and effective.<sup>40</sup>
- *Single agency capacity support:* Notwithstanding some efforts to encourage consortia, the primary unit in the international aid system is the single agency. A more comprehensive assessment of the collective capabilities in a country, or a subnational region is rare. One such was conducted in Myanmar in 2018, by the Asian Disaster Preparedness Center. A methodology (Humanitarian Country Capacity Analysis or HUCOCA) has been developed (Almansa 2019) and tested in Somalia and Bangladesh. A different approach would focus on supporting the collective capabilities of a grouping or network of Myanmar actors operating in the same area, that complement each other. In term of programming expertise, participating agencies can then specialise in some areas but not all. This perspective is present in the NRM's Operational Strategy and was also put into practice

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<sup>39</sup> 'Several informants said that they felt that international staff failed to recognise CSOs' capacities, or their ability to understand and deal with risk and uncertainty on the ground.' (South 2018:39) In response to a 2020 survey question: *To what extent are international organisations helping to strengthen the capacity of local/national organisations?* 49% of international respondents chose 'all the time or mostly' compared to only 29% of Myanmar respondents. (Humanitarian Advisory Group et al 2020) Such discrepancy should signal there is a problem.

<sup>40</sup> One such more holistic perspective is the 5 Capabilities framework, developed from global research and effectively used in development cooperation (Baser & Morgan 2008) GMI used it with Syrian NGOs who grasped it easily. See Baser, H. & P. Morgan 2008. Interestingly, African OD practitioners talk about building an 'organisation with a soul'. (Chigudu & Chigudu 2015)

by HARP-F in its support for a Rakhine Disaster Preparedness and Response Network. A stronger emphasis on collective capabilities for the public good reduces agency-centric competition.

- *Uncoordinated, supply-driven, capacity-support:* Myanmar, and national/local organisations elsewhere experience that each international agency carries out its own ‘capacity-assessment’ and offers ‘capacity-building support’ without concertation with others. This is burdensome and wasteful. When OCHA initiated a Localisation Partnership Platform (LP2) in 2019, HARP-F as lead for the workstream on capacity building recognised this problem.<sup>41</sup>

## b) Persistent flaws and blind spots

Even if the above is better addressed, there remain some big flaws and blind spots in how the international relief sector approaches capacity-development:

- *The dissociation of ‘capacity-support’ from the question of the financial health of the organisation.* The bigger problem for national/local agencies that are under resourced and financially fragile, is how to attract and retain experienced, trained, and capable people. Short-term and uncertain project funding, even with ICR/NCAP included, does not facilitate that. In addition, in under resourced agencies, staff may have to devote time and energy to many tasks because the financial resources do not allow more hires. For example, the finance management training may have taught that different people need to be involved in financial decision-making, to ensure internal

*“It is hard for us to stand on our feet for a long time without core funds or administration costs. We don’t have much reserve funds. Every time we go to the field, we receive requests to address communities’ urgent needs, so sometimes we must provide support without having a designated project fund. Another challenge is not being able to retain staff after a project finishes. We always need to hire new staff when a new project starts because we lack the reserve funds to keep staff on between projects. Consequently, reliance on short term funding inhibits us from building our organisational capacity.”* CSO staff member

checks and balances. But the organisation may not have the means to hire enough people to put that into practice. Even if they are trained and capable, they can have such heavy workloads they cannot dedicate the time and attention that quality requires. For example, the person who must write the proposal, also needs to do implementation monitoring, manage the relations with various authorities and check on complaints of poor-quality goods provided by a vendor. One Myanmar organisation that received an ‘enabling’ and subsequently a ‘delivery’ grant from HARP-F commented on how this had allowed them to get out of the abovementioned ‘capacity-trap’ and reach a ‘critical size’. They could now hire some additional staff for a more sustainable division of labour, as a result of which overall quality improved because different tasks received the required attention. High workloads and limited job security are push factors for high staff turnover – with often a renewed need for the same training. Staff retention is a major problem also in Myanmar.

- *International agencies can undermine national actor capabilities.* Being repeatedly assessed and reassessed, for due diligence and capacity purposes, with a deficit-focused approach, can undermine commitment and self-confidence which are important organisational capabilities. In addition, the greater pay and benefits that better-resourced international agencies can offer, as well the prevailing sense of aid as a hierarchy where international jobs are higher in status, are a significant pull-factor for the most capable staff of Myanmar agencies to move. As an interviewee in this review put it: *“we are really training soldiers that subsequently we recruit into our own army.”*

<sup>41</sup> LP2 faltered over international agency inefficiencies and when COVID became the top priority.

- *Increased capabilities do not necessarily lead to changes in partner relations:* If international agencies provide effective capacity support, then structural changes should result from this in the collaboration/partnership. We would expect role changes, with roles previously played by international agencies now being played (with new competency) by the national/local actor. This can be a trajectory of localisation in which the international agency initially may have a heavy footprint but over time goes increasingly into more focused supporting roles where still needed.<sup>42</sup> With the possibility that at some point the international agency 'exits', not because of reduced funding or shifting global priorities, but because the national actor has all the capabilities to continue by itself with direct donor funding. In practice, this does not often happen. *"We are condemned to remain forever in the capacity-building school, there is never a graduation ceremony"* as someone from a national Red Cross society in a Pacific Island state put it, or *"You teach us to drive, but you stay in the driving seat and keep us in the passenger seat"* in the words of a director of a Bangladeshi CSO. This raises questions about the effectiveness of such 'capacity support' or the potential self-interest of an intermediary.

### c) Capabilities from a strategic localisation perspective: a national resources infrastructure

If the longer-term goal is strengthened collective Myanmar capabilities to deal with crisis-challenges and their consequences, then there also must be investment in a national/subnational infrastructure of Myanmar resource centers. Humanitarian aid donors over the years have invested in and continue to support such infrastructure in the mostly Western countries with specialised training or advanced study centres, others with research capabilities, with interagency platforms around a specific topic, and with networks, for example of and for evaluators etc. Some operate on a for-profit, others on a not-for-profit basis. Yet there is little investment in such resource infrastructure in aid-recipient countries. Instead, expensive international resource organisations are called to be capacity-resources for actors in countries whose contexts and languages are not necessarily well known. This is not cost-efficient.

The 2015 DFID Business case that led to the creation of the HARP-F envisaged a 'strategic capacity building facility'. The idea was not worked out in detail, but indications of what it might look like are spelled out: *'Capacity building will be focused on key bottlenecks and technical weaknesses limiting the effectiveness of humanitarian response, and particularly in areas related to emergency response. This will recognise that many of the limiting factors involve organisational structure and administrative processes, as well as technical programming considerations. One aim will also be to address the barriers to access of donor funds for these organisations (...)* Many national and local NGO and CSOs involved in crisis response have a wide base of community and youth participation and mobilisation, and in many of these organisations, volunteers play key roles in humanitarian response. The Strategic Capacity Building Facility will also look to support these organisations to work effectively with their dedicated youth and volunteer members, and to support their capacity building without undermining the voluntary and charitable nature of their actions. (...) The Strategic Capacity Building Facility will also have an aim of ensuring that women are able to play an equitable role in humanitarian response, particularly in leadership and decision-making positions.'

(2015:15) To a degree HARP-F played such a role as the next text box shows. It might have been able to do more if COVID had not taken priority over the planned mapping of capacity-approaches.

<sup>42</sup> The Nutrition review draft also speaks about a 'strategy to ensure incremental transfer of responsibility' (Connell & Chui 2022:25) A good example seems to be happening in the Scaling Up Nutrition Civil Society Alliance (SUN CSA), which brings together many international and Myanmar actors. A process was initiated in late 2020 to switch to a local host model, with an INGO being funded to provide it with initial support. (idem:37)



It is possible to set up a structured learning programme on humanitarian action, in Burmese and subsequently other languages. This can consist of different levels (introductory, intermediate, advanced) and, where conditions permit, be a mix of online and live learning. Such exist already in some other crisis-affected countries, typically set up and run with an international agency in the lead. As part of its legacy, HARP-F will leave an introductory level, with a version designed for those without reliable internet connection. One limitation is that it mostly supports individual rather than organisational learning. In its content, it is also likely to be shaped more by international agencies.

Does an infrastructure of national and subnational resource centres not offer potentially much greater value-for-money? Its staff command the relevant languages and know the context(s); they can serve people and organisations from the public, private and not-for-profit sector and thereby support shared standards, joint learning and cross-sectoral collaboration. They can make a faster link between applied research and in-country practices than when reports are produced in a far-away country and may or may not get back to Myanmar etc. Myanmar actors signal they want more opportunities for peer-learning, something that very few international agencies help to enable. Yet there are already some Myanmar actors serving as resources for others, such as the Local Resource Center, Paung Ku; Metta's Center for Development Workers, training offered by the Ta'ang women organisation. There are also Myanmar-led research capabilities.<sup>43</sup> It can again be argued that this is not a priority in an acute crisis. But Myanmar has been a protracted crisis for decades and there has been a decade-long window of opportunity. Then when?

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<sup>43</sup> Some of HARP-F's Myanmar trainers/capacity supporters may set up or join with a private consulting company to continue offering such services. Would they have made a different choice if there were more institutionalised resource centers available?



### HARP-F and Capacity Support

HARP-F combined financial and capacity support and took a gradualist approach: All capabilities did not have to be in place before a grant could be approved.

Organisational capacity assessments (OCA) were conducted for the 17 Myanmar agencies (8 in Kachin and 9 in Rakhine) that received an enabling grant. From the outset they were intended as a jointly agreed baseline against which developments could be assessed. The OCA was derived from those used by other agencies. The Remote Partnering Toolkit recommends using a recent OCA from another agency, if available, and not do a repeat exercise.

Training and learning support were offered on a wide variety of topics. These included fundamentals of project cycle management, including relevant policies and procedures and Monitoring-Evaluation-Learning (MEL) and minimum requirements on reporting for donor accountability, as well as feedback and complaints handling and inclusion (with particular focus on differently abled people). But also e.g. safeguarding, fraud and corruption, and more general risk management. Technical-thematic training areas included e.g. cash and voucher programming, disaster risk reduction (DRR) and emergency preparedness. Trainings could be adapted if the situation required, e.g. with the spread of COVID from the spring of 2020 onwards, planned DRR trainings were replaced by COVID preparedness, mitigation and response. More systematic training on climate change resilience was considered, but not taken further given developments in 2020. By the time HARP-F closes, training materials will also be available on the broader organisational adaptations (including in procedures and decision-making) required in case of a major emergency. Importantly, HARP-F's training and learning support was not limited to its direct grantees. Myanmar organisations supported by other country-level funds, such as LIFT, A2H and the 3MDG, also benefitted. Overall, its trainings reached hundreds of people.

Training, and at times ongoing accompaniment and mentoring support were provided mostly by HARP-F's own resource people. These included the members of its (small) Yangon-based Capacity Enhancement Team, the staff of the regional offices in Rakhine and Kachin (2019-2020), and its various specialist advisors (e.g. on WASH, cash and markets; PSEAH; DRR; protection) and the Grants and MEAL teams, which also had staff based in Rakhine and Kachin offices. The regional offices in particular were key for the Enabling Grant recipients. *"Those we interviewed spoke highly of the process and greatly appreciate the trust which is placed in them. They describe HARP-F, particularly the Regional office staff who are critical to capacity building efforts, as approachable, good at listening, committed and 'not bossy', in contrast to other donors / agencies, and one even described the approach as a 'transfer of power', illustrating the power dynamics prevalent in the humanitarian system. Regional staff's mentoring and coaching is also felt to be knowledgeable and supportive."* (Mid-Term Review 2020:16) Noteworthy is that the Capacity Enhancement and Regional Offices staff were all Myanmar nationals, who had developed their own competencies through years of practice with national and international agencies. Some of those interviewed recognised they would have benefitted from a prior, deeper, understanding of organisational development as a longer-term and multi-faceted journey, as well as deliberate preparation for a mentoring role, how to do it well and how to review it. On occasion, other resources were used, like Humanity and Inclusion on inclusion of differently abled people and RAFT Myanmar on conflict-sensitivity.

Live trainings included experiential learning as pedagogical approach, something that become much more difficult to do when training largely moved online in early 2020, because of COVID. That requires new designs e.g. more videos and perhaps games, but is only accessible for learners with good internet connection. In post-coup Myanmar, this has become very problematic in some parts of the country. A mentoring approach (*"we focus on process, not on a single event"*) allowed this support to be better tailored to the particular priority needs of organisations. Rakhine organisations for example, were generally not yet as institutionally developed as Kachin ones. Their priority interests and needs therefore were not always the same. Training and learning would happen in a mix of Burmese, English and the locally dominant language. Training materials were mostly translated into Burmese (so far). Next to training and mentoring/accompaniment, HARP-F also used a secondment approach, notably of a protection specialist being assigned to several Myanmar CSOs. A case study of this experience is being written up.

Some form of peer learning was enabled through the Rakhine DRR Network, with CERA being a resource also to others on community-based disaster risk reduction, and by bringing LCD and Htoi San under one grant.

A perennial question is how to assess whether capacity-support is effective, i.e. leads to better practices? Some of that can be easily observable e.g. more and better essential office equipment being used. For training/learning events and process, HARP-F does not seem to have had a framework (like e.g. Kirkpatrick's 4 levels training evaluation framework) or monitored different outcomes (satisfaction; learning; application; better real-world results) systematically. Indications of improvements, not only at individual but also organisational level, were observed e.g. improvements in the ability to respond to small emergencies, better reporting etc. The problem of staff turnover, and its effects on institutional memory and sustained capabilities was recognised in an internal retrospective review. (End Line report for Enabling Grant recipients). One suggested indicator was that recipients of the Enabling Grant would be able to attract other donor funding, but this was not subsequently monitored.

In 2019 HARP-F as Co-Chair of the Capacity-Building workstream of the OCHA-led Localisation Partnership Platform (LP2), had commissioned a mapping of all Capacity Building initiatives in Myanmar. The aim was to reduce the significant overlap between international organisations and the support they offered to Myanmar CSOs, ultimately delivering a more coordinated, efficient, and effective approach to capacity building. Consultations had started in early 2020. The arrival of COVID halted the whole initiative and understandably drove attention to the COVID response. [Annual Review 2020:22]

*Recommendation 15 to all international actors: Start from the assumption that Myanmar actors have many relevant capabilities, and that international actors must learn from them as much as they can learn from international actors. They have not been surviving decades of military rule and now renewed large-scale violence without capabilities. Some of these capabilities relate to commitment, courage, resistance, navigating political sensitivities, and finding practical options in very constraining circumstances, which may not appear in the capacity-assessment sheets international agencies use, but are highly relevant to achieving desired objectives. Secondly, acknowledge that international actors can and do undermine Myanmar capacities, if they weaken their self-confidence, hire away their best staff and keep them on a financial shoestring. Time frame for action: short-term.*

*Recommendation 16 to back-donors: Make the necessary link between financial health and organisational capabilities development. Investments in capacity-development will not bring any return if the recipient organisation cannot attract and retain capable people and have enough people to devote the time necessary for quality work. Time frame for action: short-term.*

*Recommendation 17 to back-donors: Invest more in a Myanmar infrastructure of capacity-support resources. Investing in an international infrastructure of capacity-support resources but not in a similar infrastructure in countries suffering protracted and recurrent crises, does not offer value-for-money from a longer-term perspective. There are already some Myanmar actors serving as such resource and -support centers. And Myanmar actors express interest in more peer-learning and in more mentoring and accompaniment rather than one-off training. Time frame for action: Medium to longer-term (12-24 months to move in this direction)*

*Recommendation 18 to back-donors: Demand from international intermediaries who propose to do 'capacity-development', that they present clear objectives in terms of stronger organisational capabilities, not just individual competencies, and link this to role-change objectives. As the capabilities of Myanmar actors get stronger, they should be allowed to take over roles and responsibilities currently held by international actors. Prioritise also support for collective capabilities rather than individual agency ones – as further incentive for collective rather than competitive action. This should be part of a (area-based) localisation strategy. Time frame for action: short-term (3 months)*

*Recommendation 19 to international and Myanmar capacity-development supporters: Start from a holistic organisational development, and collective capabilities outcomes perspective, within which any thematic learning area needs to be fitted. Enable peer learning between Myanmar actors. Focus on experiential learning with mentoring and accompaniment, not just short training. Time frame for action: Medium-term (12 months)*

#### 4. Coordination and Localisation – or the Localisation of Coordination

What is the goal and what would success look like? From an international and short to medium-term perspective, the idea is often greater participation of national and local agencies in the international coordination structures, typically led by the UN. From a strategic localisation perspective, the issue is what coordination practices national and local actors feel to be most relevant and effective and therefore are willing to contribute to, and how can international actors best support these? In Myanmar, as in other countries, there is no smooth convergence between both.

If greater integration of Myanmar actors in the international coordination structures is seen as the measure of success, then a sequence of progress objectives can be set: Myanmar agencies get a seat at the table  
 Myanmar agencies can meaningfully participate → Myanmar agencies have influence on decision making → Myanmar agencies co-lead coordination spaces → Myanmar agencies lead coordination spaces. (see Nolan and Dozin 2019; IASC 2021)

Global and earlier Myanmar research (GMI October 2020) has identified several of the obstacles:

- Seat at the table: Resistance on the part of international agencies. In this regard, Myanmar actors speak repeatedly about the years-long struggle to get a seat in the Humanitarian Country Team, and how they still not feel treated and respected as equal partners. Similar occurrences have happened with local level coordination structures. In Rakhine State for example, as recently as the autumn of 2020, many national organisations were not invited to or attend cluster coordination or working groups. They were not even invited to working groups on CSO collaboration.

Even if they get a seat at the table (and not in a second row along the walls of the meeting room), coming to coordination meetings may not be realistic for many Myanmar agencies. Because they are not funded like international agencies, many cannot afford the staff time and transportation costs. Moving the location of coordination meetings between different townships instead of always in the Region or State capital, reduces one obstacle but not all. If they invest time and other resources yet find that they have no meaningful voice and/or that the meetings are not relevant for them, they will stop coming. Or only continue because donors make 'participation in coordination meetings' one requirement for funding. If they then find that their presence in coordination meetings does not lead to funding opportunities, there is not much reason to continue investing scarce resources in this.

There are coordination spaces where Myanmar actors are active participants, for example in the nutrition sector. KMSS, MAM, and MHAA regularly attend and contribute to nutrition coordination meetings, and two of the three Scaling Up Nutrition Civil Society Alliance (SUN CSA) steering group chairs are national organisations. (Connell & Chui 2022:36) Not surprisingly, these tend to be the larger and historically better resourced ones.

- Meaningful participation: What languages are used in meetings and written communications is a known barrier to participation. To that must be added the jargon-rich and self-referential way in which international aid agencies speak, with lots of acronyms and references to aid structures and standards or policy declarations that local actors are not familiar with. Even when they learn this, they may find that when they speak up and offer a view or advice, they are not listened to or taken equally serious as someone from an international agency. Status within the aid sector plays out here: a CBO ranks below a national CSO, which ranks below an INGO, which in turn ranks below a UN agency. At the top are the bilateral donor representatives. Myanmar agencies have found they are only treated as information sources, to give situational updates, but not otherwise equal participants. Even then, they at times sense the suspicion of international agency participants, that their information and data about numbers, needs and gaps is unreliable or even deliberately manipulated. Research in 2020 heard Myanmar CSO comment that such meetings are "*only a platform for international agencies to show off their programmes.*"<sup>44</sup> Myanmar women furthermore commented that they do not feel included and even no longer want to come if meetings are dominated by men. Socio-political factors among Myanmar actors can also influence: In that same research (prior to the coup), participants from other identity groups expressed their reluctance to speak not only if government officials were present, but also Bamar national staff from international agencies. (GMI October 2020)

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<sup>44</sup> GMI October 2020. Some also express doubts about the actual effectiveness of these coordination attempts. They notice the incentives for competition in the international aid sector, and the competitive behaviours of agencies or key individuals in them. They also notice how the international aid system can increase competition between Myanmar agencies. In an already divided country, this is not a helpful impact.

The competencies and behaviours of the meeting coordinators can play some role here: do they ensure the meeting is inclusive and that also Myanmar actors are adequately listened to? Are they trained in facilitating group dynamics?

- Doubts about effectiveness: When Myanmar actors have a seat at the table and can reasonably participate, they may still be reluctant if they feel the meetings are not very relevant and useful. One concern heard is that international coordination mechanisms are much too slow when a rapid response is needed (“no action only talk”), certainly if decisions must move back and forth between sub-national and national coordination levels. As in other countries, local and national actors during acute emergencies will be coordinating their responses quickly and ‘informally’ e.g. through WhatsApp networks. That of course does not guarantee more structural coordination. Platforms like the Joint Strategy Team for Kachin and northern Shan State show that Myanmar actors can also run more strategic coordination. Here, international actors, unable to access non-government-controlled areas, allowed (had to allow) Myanmar leadership. Strategically, this is the long-term direction to go. More insight in how the JST has functioned and evolved over time would be relevant.

Secondly, the natural inclination of many local actors is also towards area (and populations within an area) based coordination instead of sectoral/thematic coordination.<sup>45</sup> Having to go to separate sector cluster meetings for responses in the same socio-geographical areas does not feel like an efficient way of working.<sup>46</sup>

From a strategic localisation point of view then, the key question is no longer: How can we get more Myanmar actors to meaningfully participate and co-lead the international coordination structure? It is: How can international actors complement and add value to an increasingly Myanmar-led strategic and operational coordination?

This leaves aside the aspect of common standards and approaches by the multitude of actors. Technical working groups remain relevant and needed. But are they, in the current circumstances with very different operating conditions in different parties of the country, not best inserted under area-based coordination structures? Technical-thematic guidance is likely to be most useful if tailored to the particular conditions of each area, capturing creative and innovative approaches there and sharing these with those from other areas. After all, nutrition and food security challenges in Chin State will differ, or have to be addressed differently, from those in e.g. Tanintharyi Region. Just as e.g. WASH responses in southern Shan State will not be identical to those in central Rakhine state.

*Recommendation 20 to international actors: Prioritise area-based over sectoral/thematic coordination, as the needs, capabilities and operating conditions in different sub-national contexts of Myanmar vary greatly. Area-based coordination also has greater potential to encourage collective capabilities-development and fits within area-based localisation strategies. Time frame for action: medium-term (six months)*

*Recommendation 21 to international actors: Set joint leadership over coordination efforts as the operational medium-term aim. That cannot happen unless there is a much more enabling environment for Myanmar actors to participate, meaningfully. That means the use of Burmese (and possibly local languages in certain areas) next to English, an inviting environment for all participants (a responsibility also of the meeting facilitators), the resources to attend, focus on the purpose i.e. the people the agencies want to support and*

<sup>45</sup> The Arakan Humanitarian Coordination Team, the Border Emergency Response Team, the Karen Emergency Response Team and the Coordination Team for Emergency Response all have an area-based foundation. Some of them are new.

<sup>46</sup> On area-based coordination, see also Konyndyk et al 2020



*not the agencies themselves, and perceived relevance of the meetings. Time frame for action: medium term to start/advance significant efforts in this direction.*

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### HARP-F AND FCDO CONTRIBUTIONS TO MORE EFFECTIVE COORDINATION

HARP-F itself worked to make certain technical coordination platforms more effective. HARP-F played a key role in revitalizing the Cash Working Group in 2020. HARP-F funded and received 30% of the time of an international expert (John Nelson), contracted by Mercy Corps, to also act as their expert and be a co-lead of the cash sector/working group together with the Myanmar Red Cross. HARP-F's cash technical advisor also provides advice and insights to LIFT as they worked with government on cash programming in response to COVID-19, and with UNICEF who, apparently together with the Dpt. of Social Welfare, leads the Social Protection Working Group.

The WASH group at national level was led by UNICEF, but HARP-F could influence it through its funding and its WASH expert. HARP-F is the largest funder of WASH in Myanmar, with 66% of its allocated grants going wholly or partially to WASH, and with HARP-F funding covering 70% of all WASH programming for IDPs in Rakhine State. HARP-F reportedly in 2020 led the monthly WASH working group in Rakhine and has also been strongly involved in the WASH cluster in Kachin. It is also part of the WASH donor group meeting. The HARP-F protection expert was equally able to contribute to and influence that cluster/working group.

HARP-F's support for the integration of local actors in the UN-led cluster system focused mostly on technical areas where it was itself actively involved. For the more local level coordination platforms, the HARP-F staff in the Rakhine and Kachin offices could open doors for Myanmar CSOs but had to encourage them to join in these coordination spaces given the abovementioned obstacles and reservations.

*'HARP-F has taken steps to encourage NNGO participation in co-ordination fora but they still face significant barriers. Practical steps include obtaining and sharing information from co-ordination meetings, supporting an NNGO-led Joint Strategy Team in Kachin, and involvement in a Localisation and Partnership Platform (LP2) established not long before COVID-19 by UN-OCHA, for which HARP-F and Metta (an NNGO) is leading one of the workstreams. However it is not clear to what extent HARP-F 'builds capacity' for NGO engagement and national NGOs feel excluded, sometimes deliberately so, from a system dominated by outsiders who do not understand the complexities of the local context and conduct all their work in English. [This is a particular issue in Rakhine where there are no CSOs at the large majority of co-ordination meetings and there are lower levels of trust between INGOs and CSOs working there, in reflection of the complex nature of the humanitarian crisis there.] (Mid-Term Review 2020:18)*

Beyond the technical aspects, HARP-F and FCDO have been advocating for the international coordination structures to pay active attention to what comes from affected populations via feedback mechanisms, and for international agencies to be very serious about their duty of care, also to their Myanmar 'partners'.

Until the onset of COVID, HARP-F was also one of the few participants in the Humanitarian Donor Group with a strong understanding of the operational realities, an important factor for effectiveness.

Alongside the formal UN-led coordination structure, since the start of the Covid-19 epidemic in 2020 FCDO initiated regular meetings of four of the country funds it is heavily invested in: HARP-F, LIFT, LIS and A2H. Myanmar actors, in particular the JST, were sometimes invited to participate and given the space to speak and voice their views and recommendations. This is in line with a deliberate objective to increase the presence and influence of 'local voices', in a reflective setting in direct conversation with fund holders. In addition, technical assistance was provided for improved coordination among and increased funding for nutrition by UK-funded instruments (LIFT, A2H and HARP-F). This also resulted in greater engagement with the global, Myanmar wide and Rakhine nutrition clusters. HARP-F here led on the learning, e.g. by commissioning the nutrition localisation report (Connell and Chui 2022)

## VI. MYANMAR CIVIL SOCIETY ACTORS STEPPING IN AND STEPPING UP

By default, already prior to the coup many international agencies have had to reduce their own operations and/or relocated many of their international staff outside Myanmar. Still, there will be resistance to advancing localisation because it requires of international actors not only different ways of working but also different mindsets. Myanmar actors can demand change but will be more influential if they are also propositional i.e. say what they want and how they will handle this with integrity, responsibility and accountability. When localisation is advanced and deepened by design, Myanmar actors will have to step into roles and assume responsibilities that so far have largely been held by internationals.

This will also require significant conversation and action between Myanmar actors. Competition, power dynamics and questions about who represents whom can also play out among them, as the following quotes from this research show.

*"It's important to be aware of power dynamics within consortia. There needs to be some actor who can work as an arbiter or some kind of governance mechanism that is independent and immune to undue influence by any member of the consortium. If donors are going to directly support a consortium, then they should consider seconding a small secretariat to support them, that could be one option to manage the risks and sensitive issues. Also, by directly funding the big national NGOs [who then cascade the funding to smaller consortium members], you are making a decision to perpetuate those uneven relationships between local organisations. The overall state of civil society in Myanmar is not balanced, so donors are going to need to make a decision about whether they want to build on the big ones to get up to scale quick, or if they want to level the playing field. Also, the grassroots emergency response is really the key thing about the current humanitarian situation in Myanmar, so if you only fund the INGO-like orgs, then you might be stifling that grassroots level. Focusing on a bottom-up approach would probably be more sustainable, if not more efficient."*

INGO staff [see Harrison 2021 on consortia health checks]

*"We did research on resilience and found that ideas about localisation is often oversimplifying the realities. E.g. in our heads, localisation means working through local CBOs and CSOs, but the local communities say "they don't represent us" or "they aren't listening to us" or "those are elites from the town"."*

Staff from a "partnership model" INGO

Promoting diversity, inclusion and democratic values implies critical reflection on diversity and inclusion and the use of power within the association, organisation or network. That applies also to those expected to 'represent' a broader Myanmar CSO-CBO constituency: do they provide information, consult widely, speak for the collective, report back? And it requires critical reflection on the power a Myanmar CSO or CBO has in its relationship with affected populations.

Throughout this report, the argument has been made that Myanmar CSOs should not just be service providers, but act as a civil society promoting inclusion, the protection of human rights, democratisation at all levels, and peace.

*Recommendation 22 to Myanmar actors: Be propositional towards international actors. Myanmar CSOs need to own their standards of integrity, quality, and accountability. While international ones can be a source of inspiration, simply copying them as a requirement for international funding is not good enough. Articulate your own standards, in the first place towards Myanmar stakeholders, in ways that are contextually realistic. If it does not already exist, over time this can lead to a Myanmar standard setting and accreditation institution, acting as an internal rather than external guarantor. At the same time, be proactive with international donors and intermediaries on how much practical integrity, quality, and accountability you can assure in specific contexts of the country today and how you will do that. Along the same lines, be more propositional on how to further develop and strengthen a Myanmar resource infrastructure for civil society development, in its different lines of action. If the NUG is seen as the legitimate government, then also be propositional on this to them. Similarly, articulate and promote your own principles on political positioning in the current situation, rather than leave this difficult and sensitive issue to international actors only. Time*

*frame for action: Medium-term (12-24 months – this may vary somewhat for the Myanmar actor groups in different parts of the country). Time frame for action: Medium-term*

*Recommendation 23 to Myanmar actors: Internally, be inclusive and attentive to internal status and power dynamics. Also more established Myanmar CSOs can fail to recognise the agency and contribution of very localised actors, and risk bypassing them. The same primary principle of 'support and reinforce, do not replace' is also applicable between Myanmar actors. Identity-based behaviours can add a further layer to this: non-Bamar comment that Bamar often show behaviours of assumed superiority. Undoubtedly, there are also stereotypes that influence behaviours between people from the so-called 'ethnic minorities'. Furthermore, social traditions that subordinate women and perhaps youth, are an obstacle to inclusive participation. All of this requires active attention, a willingness to be self-critical and some confidence and competency in handling it well. Time frame for action: medium term and ongoing*

*Recommendation 24 to Myanmar actors: Internally, promote and strengthen collaborative willingness and competencies. Competition between Myanmar actors is not in the best interest of people in Myanmar. Will and capabilities to collaborate among Myanmar CBOs and CSOs will lead to better outcomes for people in acute need. Competitive behaviours also replicate a long-standing atmosphere of socio-political divisions. Modelling collaborative behaviour therefore has deeper meaning. Continue to develop and support networks and other forms of collaborative arrangements, with participatory governance and decision-making. Time frame for action: medium-term and ongoing*

*Recommendation 25 to Myanmar actors: Towards other Myanmar actors, remain a force for rights, democratisation and peace. Responding to acute humanitarian needs is necessary but the only real answer lies at the level of political change. So remain advocates and role models for human rights, democratisation and non-violent handling of differences and conflicts. Within the current context of more non-state armed actors and increasing violence, be advocates for respect for fundamental constraints under international humanitarian law, like the use of landmines and child soldiers, and the protection of civilian infrastructure. Geneva Call is one of the organisations with experience of promoting this among the EAOs – that needs to be [further] extended to the PDF and the SAC-aligned militia as well.*

*The behaviour of the Tatmadaw and their associates does not mean that the political and armed opposition should not be engaged on their own inability to be inclusive and collaborative, and their possible lack of internal democratic practices. The challenges to make the NUG more inclusive and the debates around the National Unity Consultative Council (NUCC) illustrate the relevance of the point. Even if the political-security situation improves, long-standing issues will re-emerge. These include, among others, the long-standing and divisive identity politics; the question of land ownership; a reduction of the illicit economies and a more inclusive economy the benefits of which are spread more widely; the question of a unitary or a federal state etc. In this context, a critical reflection may also be required about the formal peace negotiations and why they stalled between 2016 and the coup? What needs to be learned so that future negotiations between the different influential players in Myanmar are more constructive and productive? Time frame for action: medium-term and ongoing*

## ANNEXES

### 1. Interviews for this 2021-2022 round of research

HARP-F Grants Management Team (Siobhan, Zar Ni, Su Myat, Juno, Naung Naung): 8 December 2021

Viorica Birnbaum: 8 December 2021

David Melody & Patrick Aung: 14 December 2021

Toby Sexton: 14 December 2021

Nyein Chan & Kyaw Soe Khine: 16 December 2021

Ye Min Zaw: 20 December 2021

Aung Naing: 11 January 2022

Ashley Proud, Trocaire: 1 February 2022

Zaw Khaing Win. Age: 1 February 2022

Myo Htoi Li, Peter Zaw Aung, Father Joseph Yaw. KMSS: 2 February 2022

Ja Nan Lahtaw, Hkawng Sing, Nang Raw. Shalom/Nyein Foundation: 3 February 2022

Pansy Tun Thein. LRC: 3 February 2022

Pray Thein. People for People: 4 February 2022

Aung Kyaw Kyaw Htway. MHD0 (Myanmar Heart Development Organization): 4 February 2022

Thomas Devan. Center for Social Integrity: 4 February

Kyaw Naing Soe. CERA: 4 February 2022

Anthony Etim, Jonathan Bartolozzi. Mercy Corps: 7 February 2022

Duncan McArthur & Alex Pauk: The Border Consortium: 9 February 2022

Myitung Sutbawmring. Pyoe: 10 February 2022

Aleksander Kuzmanovic Relief International: 10 February

Geis, Lu Nge. Kwat: 14 February 2022

Phyo Maung Maung, Paing Soe, Nay Nyi Nyi Lwin. CPI: 14 February 2022

Khin Hla, Nwe Zin, Than Tin, Yaung Chi Thit. 16 February 2022

Matt Walsh DCA: 16 February

Joanne Raisin/ Thazin Kyaw Linn/ Abigail Wood / Arkar Kyaw FCDO: 23 February

Simon Little: FCDO humanitarian advisor: 25 February

Gum Sha Awng. director Metta / member JST: 1 March

Thomas Onsare Nyambane & Narciso Rosa-Berlanga: Myanmar Humanitarian Fund: 18 March 2022

Taniele Gofers & Se Sin Mya: Access2Health: 22 March 2022

Thu Thu Nwe Hlaing, LIFT: 25 March 2022

David Gilmore: Nexus Response Mechanism: 28 March 2022

Luc Verna, ECHO: 5 April 2022

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Attitudes, Behaviours.  
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### 3. Some Impacts of the February 2021 Coup on Crisis Responders

- Mobility and access to people in need was already restricted prior to the COVID situation and has only increased with COVID (since spring 2021) and after the coup.
- It has become further constrained by the dangers of being caught in the crossfire or from landmines and unexploded ordnance, but also by deliberate State Administration Council (SAC) practices to blockade areas with strong armed opposition and limit aid going in.
- Everybody can be thoroughly checked at the many checkpoints: carrying anything identifying the person as an aid provider can put her or him at risk. Sexual harassment at check points is a serious risk.
- Even where aid providers have somewhat better operating conditions, they have difficulty accessing finance as the banks are not functioning as before, they cannot operate a bank account if they have no active registration now with the SAC, or funders do not want to channel money via banks that the SAC can control. Overall, the cost of accessing cash has increased.
- Supply lines in many areas are disrupted. Suppliers may themselves have difficulty restocking or are reluctant to provide supplies where this can be interpreted by the SAC as support for the opposition. Even pharmacies in some areas are unwilling to provide amounts of medicine, as all their sales are tightly checked by the SAC.
- Monitoring programme integrity, implementation progress and outcomes have all become much more difficult.
- The operational capabilities of responders can be further affected by staff members sick or looking after ill relatives. The staff of some may have gone into hiding or fled for fear of arrest.
- Communications and digital security concerns are high: Communications could be monitored and used against individuals or organisations. In some areas, internet and mobile phone access has been restricted or blocked altogether by the SAC. Electricity may be interrupted. The cost of communications has also gone up.
- In the polarised political environment, previously registered Myanmar organisations may be uneasy renewing their registration with the SAC, if it is due. This may be seen as complicity with the SAC; yet not doing so may cause them to be closed.<sup>47</sup>

<sup>47</sup> Myanmar political parties face a comparable problem.



- Many international staff have relocated out of Myanmar (several already pre-coup because of COVID-19): whether this affects operational capabilities will depend on how much decision-making authority is given to the Myanmar staff still in-country. For some parts of the country, the center of aid management has shifted back to Thailand, where it was more prominent until 2016, when international actors moved much to Yangon. There are however only certain populations that can be reached from Thailand. There has historically not been a cross-border operation from India. Yet many refugees from Chin find themselves there now. Reportedly, conversations are underway with the central government of India and the state government of Mizoram.

#### 4. Contextual Differences within Myanmar. A short description

**Rakhine** Civil society is generally quite suspicious of outsiders (including international agencies and national NGOs). There are several reasons for this, but one is the fact that Rakhine's civil society is less developed compared to Kachin or Karen state, where institutional links with international faith-based organisation, a broad diaspora community and cross-border relationships with international agencies has strengthening local organisations considerably over decades. In recent years, Rakhine's civil society has been developing rapidly: so too are now the parallel governance structures of the Arakan Army (AA). (see e.g. Kyaw Lynn 2022) It is important to be sensitive to potential rivalries between local organisations related to competition over funding, identity, or asymmetrical capacity development and to adopt a careful and confident sensitive approach to engaging with the AA when necessary.

**Chin state** has historically been (together with Rakhine) one of Myanmar's most underdeveloped regions. It has been extremely affected by post-coup fighting and displacement, contributing to a desperate situation for Chin civil society who already struggled to access the resources they need to address local needs before the coup. However, the Chin communities' strong religious institutions are an important foundation of the diverse efforts that have maintained local community structures that help to weather the impact of Tatmadaw offensives and even set up basic social service and governance structures in Non-government Controlled Areas (NGCA) in recent months.

Civil society in **Sagaing and Magwe** is different from that in ethnic minority areas. As in most Bamar (the majority identity group in Myanmar) rural areas, it is organised around three pillars: faith based parahita ('altruism') organisations, community-based social welfare volunteer networks and political parties (mainly the National League for Democracy or NLD). Together with former government staff who joined the Civil Disobedience Movement (CDM), new IDP committees and People Defence Forces (PDFs), these are the key emergency responders here. Generally, international aid actors have fewer prior connections here, though there are exceptions notably for livelihoods and agriculture focused development support. LIFT's Dry Zone Small Grants Scheme covered these Regions for several years. There is comparatively less humanitarian response experience.

**Kachin state** is the home to all the biggest Myanmar NGOs and has a strong and advanced civil society. Since the resumption of armed conflict there in 2011 and the subsequent mass displacement, Kachin CSOs and national NGOs with strong links to the State have established advanced coordination structures including but not limited to the Joint Strategy Team of 9 CSOs. There are concerns of some ethnic minorities that these larger, well known and better funded actors are not sufficiently sensitive to their needs and priorities and that faith-based organisations dominate decisions about humanitarian activities. The progress made by these big actors does not reduce the practical questions related to localisation here but calls for a tailored approach.

Across **Shan state**: local responders are generally more ad hoc, and community-based than in other parts of Myanmar's border areas. Like in Rakhine and Sagaing/Magway, Shan State's civil society has had less interaction with international agencies. It is generally formed around religious or ethnic lines, which adds to the conflict sensitivity considerations in Shan State. The north of the State, and increasingly the south, are

grounds of intense inter-EAO conflict, which exacerbates the complexities and risks. Displacement in northern Shan is consequently very volatile and unpredictable, meaning that most of the burden of supporting IDPs falls onto communities who shelter them in monasteries and private homes with the support of community-level social welfare volunteer networks.

**Karen and Karenni** states in the southeast (and to a more limited extent **Mon and Tanintharyi**) are the only parts of the country where cross-border support and programming is the key characteristic of humanitarian work. The Karen National Union (KNU) controls large swathes of territory along the border with Thailand where ethnic civil society and ethnic service providers (ESP) have been the sole source of humanitarian support for communities in NGCAs for decades. They have developed considerable institutional capacity and technical expertise from past cross border collaboration with international agencies. Their greater experience of informal financial services, from historical cross-border programming is potentially a source of learning for other regions, even if these channels may not reach across all of Myanmar's territory. Because of the intense fighting in these areas, many CSOs and ESPs have themselves been forced to relocate or displace. This affects coordination and implementation practices.

This broad-stroke picture needs further nuancing:

- For now, Kachin and Rakhine State see less intense fighting than several other areas. That may change. There are few areas of Myanmar where medium-term stability can be expected.
- What approach organisations take to dealing with the SAC is to some extent context dependent. In areas of intense fighting, human rights abuses and militarisation, there is no coordination with SAC controlled institutions, while in (still) stable SAC controlled areas, local and international organisations must maintain a certain level of connection with local administrations, e.g. for travel authorisations.
- Area-based response strategies need to take into account that the insecurity can force populations across Region and State borders. For example, when Karenni IDPs moved north to seek shelter in southern Shan state, this required international agencies to start looking for partnerships among a completely different set of actors and host communities. Ensuring that emergency response was conflict sensitive required rapid, candid conversations from well-informed and neutral interlocutors in an area that was not previously considered a humanitarian needs hot spot.
- A general picture at Region or State level should not obscure those dynamics on the township or even village tract level can be different. Respondents in interviews conducted for this study noted that some communities feel antagonistic to "local" civil society organisations (CSOs) working at the state level and expressed preference for community-based organisations (CBOs) who only work in their township. Regional localisation strategies need to take this into account.

## 5. Reflecting on Value-for-Money

Value-for-money in the context of localisation is another reflection point. Three considerations are offered here:

*How is cost calculated?* Calculating the cost appears straightforward though it may not be. At least three reasons account for this.

- Local organisations around the world have been able to underprice themselves when bidding for a contract, out of desperation to get some income. They then operate at a loss. Moreover, international agencies often reduce cost centers (e.g. office and transport; security equipment; staff numbers; social protection for staff etc.) of their local 'partners'. If that happens, these are made to operate as cheap labour.
- Value-for-money reviews at the project level, that do not take into account the transactions costs of at times multiple intermediaries, further distort what should be the real cost aspect of the equation. In the course of its research, the localisation review came across several examples of multiple intermediaries – between international agencies – one or more of which largely served as mailbox for money going further and reports coming back.
- Transaction costs are also increased, less visibly but no less real, by the single agency focus of the international aid system and by its incentives for competition. The single agency perspective leads each feeling justified in setting up, staffing, and equipping its own operational center. That carries a high, collective, cost (and may contribute to local inflation). Some international agency alliances have addressed this by agreeing to have only one, common, country office. A very few INGOs would set up office within the premises of one of their important local partners, also enabling constant capacity-sharing. The incentives for interagency competition make coordination harder – and more expensive.

*Who decides value?* Some years ago, ActionAid tested an alternative approach in which the intended beneficiaries were asked to assess whether the budget being spent is giving them the best possible value. Note, in this light, that the starting point may be what we value: all of us spend money on what we value, which is not always and only what comes first in a Maslowian hierarchy of needs. Forcibly displaced people have often been known to prioritise means of communication, because – from their resilience perspective – communications and connections may have higher value than a second meal that day. Multipurpose cash is a now accepted approach that allows households to determine what at that time has greatest value for them. Community- or social group led interventions follow the same principle. It is comparable to 'participatory budgeting' now practiced (at least for part of the public budget) in many cities and local administrations around the world and promoted as one important approach to participatory governance.

*What time perspective is applied?* 5 x 1 is not the same as 1 x 5. What appears value-for-money with a short-term perspective is not necessarily so with a longer-term perspective. Getting annual funding five times successively does not enable the same approaches as one time funding for a five-year period. Persistent short-term funding in protracted crises will lead to chronically underdeveloped potential capabilities.

## 6. The Research Team

### Global Mentoring Initiative (GMI)

GMI is an independent advisory and consultancy service that specialises in healthy collaborative relationships, in teams and within and between organisations. Its core are practitioners with long experience of working in (humanitarian response) and on (participatory governance and peace) crisis situations, caused by natural disasters or violent conflict, who are also trained in organisational and team coaching. The nature and quality of the collaboration between national/local actors and international aid agencies is one, long-standing, area of work. Our first significant involvement was as part of the evaluation team looking at the impact of the international response to the 2004 Indian Ocean tsunami on local and national capacities. Since then, GMI was present at the World Humanitarian Summit and a co-founder of the Charter4Change, the Alliance for Empowered Partnerships (A4EP) and NEAR. GMI has led 'state of localisation' assessments in Jordan, Myanmar, Bangladesh (general and for Cox's Bazar), Pakistan, Indonesia, Ethiopia, Somalia, eastern DRC and Colombia, and co-designed and co-led a multi-stakeholder dialogue on localisation in the Philippines. We are in constant conversation with several donors, INGOs and leaders of local/national organisations in various countries. We are actively engaged with the Grand Bargain Working Group on Localisation, localisation-related conversations in the Interagency Steering Committee (IASC), the OCHA-led reflections on country-level pooled funds and the cash working group's reflections on intermediaries. Our first engagement with Burma dates back to voluntary work with refugees in Thailand, in 2005. It became more regular after Cyclone Nargis in 2008.

### RAFT Myanmar

RAFT Myanmar is a not-for-profit company registered in Myanmar that supports national and international humanitarian and development agencies in developing a better understanding of the contexts in which they work, and the possible unintended effects of their projects. RAFT Myanmar mainly provides technical support to these organisations on conflict sensitivity and how to apply the Do No Harm Framework to ensure their work does not unintentionally exacerbate tensions or inequalities but maximises contributions to trust and collaboration wherever possible. RAFT also conducts activities aimed at increasing the understanding of our partners and clients of the important dynamics related to inclusion, marginalisation, and community perceptions in different regions of Myanmar.



7. Map of Myanmar



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