

Advocacy position on draft JRP 2020 and Rohingya response by CCNF and Local/ National representative of SEG

JRP 2020 in Rohingya Response should be a real Joint Venture ensuring Aid Transparency and Locally Accountable Management

Strive for a Single line Authority with Long Term Humanitarian/ Refugee Response Policy: No More Thriving in Chaos

1. Our position: Striving for a Policy based System

We, the **local and national NGO representatives in SEG (Strategic Executive Group)** drafted this position paper on the **draft Joint Response Plan (JRP) 2020 for the Rohingya response**. UN agencies formed SEG to provide policy guidance for ISCG (Inter Sectoral Coordination Group), the body leading the Rohingya response. We are also the part of CCNF (Cox's Bazar CSO NGO Forum www.cxb-cso-ngo.org), a homegrown network to build the local civil society organizations to promote human right society in Cox's Bazar. In respect of Rohingya response, we prefer the approach of "long term but repatriation" instead of "near term repatriation". There is no alternative of repatriation as the people have the right to go back to their homeland, but the repatriation must be sustainable. Situation around Rohingya response is so dynamic, everyday it is changing, so the policy document should be a live document.

We have considered the following spirit and discourses while drafting this position paper. First, we are proud of the spirit that **our Honorable Prime Minister (HPM) Sheikh Hasina opened the border to conserve the persecuted to uphold the humanity**. Thus Bangladesh appreciated worldwide and we want to keep it up. We reiterate the spirit of Comprehensive Refugee Response Framework (CRRF), Global Compact on Migration and Global Compact on Refugees proposed by Bangladesh in UN on September 2016. We want to take Whole of Society Approach (WoSA) and the New Way of Working (NWoW) into account as promoted by UN. Grand Bargain commitments signed by all the UN agencies and major donors and Charter 4 Change signed by the leading international NGOs (Non-Government Organizations). These are the key documents that advocated for "Localization of Humanitarian Response". We consider that UN agencies and INGOs should keep those promises ratified by them.

Taking all the above-mentioned perspectives into account, we propose a level of economic self-reliance of Refugee families in camps, full education facilities under Myanmar curriculum, a level of decongestion by using prefabricated shelter with vertical extension in camps. We feel these activities would give the refugees a level of hope with human dignity and reduce a sort of desperateness as we see in respect of human trafficking cases.

We urge government to think to prepare a national policy on humanitarian and refugee response with a reorganized national task force led by the Prime Minister's Office and participated by local Member of Parliaments, local Upazila chairman and local NGOs. We also propose that the Office of RRRC (Refugee, Relief and Repatriation Commissioner) should be directly reportable to the Prime Minister's Office. ISCG has to be integrated to RRRC's office as counterpart in order to develop RRRC office capacities of monitoring, planning and financial tracking. We believe in a reasonable role of UN agencies in this regard. Deputy Commissioner's Office must have a role to scrutinize the host community projects.

We support Cox's Bazar district development planning by UNDP, but any uncertainty of funding should be not be an excuse to delay separate host community sector and channeling 25% is a must from now and on.

We also urge the government to think to provide refugee travel pass to the Rohingyas so that they can travel abroad and this will might stop Bangladeshi passport forgery cases and also to encourage family reunion of Rohingya families living abroad.

Aid and humanitarian response should be anchored with locally sustainable organizations. i.e., local government and local NGOs. Aid and humanitarian agencies must show best possible approach of internal and external accountability of the response within the framework of all the above-mentioned agreements and commitments. Above all, we propose the sole authority of the government of Bangladesh with a reasonable involvement of UN agencies. Coping with the reduced level of aid the important crosscutting issues should include but should not only limited to technology transfer to the locals only, there should be also peace building in response to the potential security and conflicting situation in future and appropriate level of environmental recovery. We believe that the refugee situation in Bangladesh is different from others. The local community were the first responders to the persecuted. So these positive elements could be used for localization of humanitarian response.

2. Single authority is needed for an Inclusive process for optimum use of resources and for better coordination.

JRP 2020 is an under reported document and hardly a joint venture. A number of agencies including local, national and international NGOs hardly report to the JRP. Even the government's investment on Rohingya response in Cox's Bazar is hardly reported in JRP. ISCG is led by mostly expatriates from UN agencies and two INGOs. There is hardly any participation of representative of any local NGO or local government which has been the demand of CCNF since the

beginning of 2017 influx. **Such a non-participation is happening as ISCG hardly has authority over any agencies** and provide access to all others especially local government and local civil societies. ISCG have to consider that why they hardly been able to provide vital statistics, e.g., how many local procurements have been done, how much money is spent in total for host communities and how much local employment have been generated.

ISCG has a functional relationship with the Office of RRRC of the Government of Bangladesh, the designated authority to the Rohingya response. RRRC office, in fact, controls the camps through a number of CiCs (Camp in Charge) while the Deputy Commissioner (DC) of Cox's Bazar district leads the development issues in the district along with the nation building agencies. ISCG also maintains same sort of functional relationship with DC office.

Functional relationship hardly establishes any authoritative relationship. JRP 2020 is just shared with them through some nominal workshop events. Since the JRP 2020 is a plan and has no authority, there are every possibilities of duplications and there by wastage of resources. Now that there is a clear sign of dwindling aid situation and a growing concern of security and conflict. UN agencies need to consider the integration of ISCG in RRRC office, especially to strengthen its capacities on planning, monitoring, financial tracking, need assessment and control. At the end the government need to take full responsibilities of the response. **This is less costly and facilitates the technology transfer.**

Local NGO is the Achilles Heel of this complex process and, in fact, this discourages them to operate. Local NGO means the organizations originated in Cox's Bazar. The local and national organizations do suffer from an extra stringent process of approval and monitoring for their humanitarian projects. They have to pass through many tiers of approvals if they want to implement a project, and if it is a matter of supply they have to pass through approximately 12 different authority levels. To meet the regulations they need to report to the DC office, RRRC office, CiCs and local government at Upazila (Sub District) level. And neither anyone came forward to raise this issue nor addressed. On the other hand, the UN agencies along with their partnering NGOs hardly need any checking or local approvals. Nevertheless, participation and easy access for local and national NGOs is imperative, primarily for localization of humanitarian response.

In view of the only available financial tracking report (HAG and Nirapod, December 2017), around 69% of Rohingya aid go through the UN agencies, 20% through the INGOs (where around 7% alone by ACF), 7% for Red Cross / Crescent and only 4% go through local and national NGOs (including BRAC, they have major funding in this regard). As the financial data is not much available, we did a survey on the number of partnership projects in host community and camps, where local NGOs have only 9% of those. **We urged, 80% of the fund should go through the local and national NGOs while UN agencies and INGOs should limit their role only into monitoring and technical assistance from Cox's Bazar.**

Until single line integrated system is in place, **we propose as interim measures as follows;**

- (i) **Inclusion of local and national NGO across the sectors of ISCG leadership with priority to local NGOs in democratic and transparent process, not by handpicked or wishful approach.**
- (ii) **Access of local NGO and local government in HoSoG (Head of Sub Office Group) and ISCG meeting in Cox's Bazar.**
- (iii) **Local NGO / CCNF and local government leadership should be given space to meet with visiting dignitaries or donors for the local people's voice to be heard.**
- (iv) **Introduction of Bangla language as the means of communication in the humanitarian operation in Cox's Bazar level.**
- (v) **All the expatriates of UN and ISCG should be trained on Bangla language and cultural issues of the localities.**
- (vi) **All the involved expatriate and staffs should be oriented on Principles of Partnership (2007), Grand Bargain Commitments (2016), New Way of Working (NWOW, 2016), Charter for Change (2016) and Global Compact on Refugee / Comprehensive Refugee Response Framework. At least all those expatriate and staff should know the background spirit of all those agreements, primarily which are accountability and participation to the local, aid transparency and anchoring with locally sustainable institutions.**
- (vii) **There should be financial tracking system that 80% of funding should go through the local and national NGOs, they should look over the field operation solely. UN and INGOs should limit their role into monitoring and technical assistance only.**

3. Observations on JRP 2020 Framework: Is it result oriented and locally appropriate?

We have the following observations on JRP 2020 framework.

- (i) Generally, problem or need analysis are considered as rationales in any planning document and then measurable terms in respect of intended objectives and impacts/ results are seen. Such **formulation is necessary for tracking the impacts / results**, especially by a third party. We hardly observe this in the planning document.
- (ii) Both the **midterm review and need assessment conducted by UN and international agencies** hardly had any participation of local agencies. So those have lost the opportunity of integrating the local knowledge into it which could have been low-cost with longer term impacts.

- (iii) In respect of the crosscutting issues related to environment or ecosystem recovery and greening, there could be directives of using no plastics. **Alternatively, the use of local and ecologically degradable materials could have been suggested.** Another important crosscutting issues is **building family-based self-reliance.** There should also be **a cross cutting issue on a % of procurement should be done from local market. We believe there are scopes to do these.**

There are examples of some items, which are abundantly available in Bangladesh, .e.g., Bangladeshi medicine are popular in worldwide, but in Rohingya response there are examples of importing medicine from other countries. **So, the local supply or capacity should be assessed before any decision of import is taken.** There should be a plan on how the interventions and demand in Rohingya camps could benefit the local and national economy, e.g., Cox's Bazar is popular for producing dry fish and salt; Sirajganj and Bandarban are famous for weaving of *Lungi* and *Thami* commonly used by Rohingya men and women. **Planned effort of procuring these items from the local and national producers instead of importing from abroad would facilitate a huge benefit to the local and national economy. Same planning could also be considered for rice and vegetable productions in locality taking the 1.1 million refugees into account as a market opportunity for the local and national level.**

It could have been a strength of the JRP 2020 or ISCG if the homegrown process/ institutions/ capacities were considered and asked contribution of all involved local, national and international NGOs with their democratically elected leadership for different ISCG sectors and HoSoG meeting. Instead, NGO Platform (NGOP) is highlighted for the NGO coordination, which is hosted by DRC (Danish Refugee Council) and is formed out of FD (foreign donation regulation steered by NGO Affairs Bureau) process. It has to be abided by the government rules and it is dependent on foreign funding. We have joined and engaged in NGOP but now it has created more confusion among NGOs. There are a lot of good Bangladeshi experiences / different approach of managing such a network, there were lack of such examples practice. We have raised a lot of concern of NGOP governance and lack of due diligence in its committee election process. So, we are afraid the NGOP has been able to create some legitimacy to represent NGOs in Rohingya response. We have repeatedly asked for review of NGOP activities and governance. NGOP should not be given example or excuse to drive out critical local NGO voice in Rohingya response management.

So, we will plea to ISCG and UN agencies, to contact directly to NGOs and tell them to select their representation separately for local, national and international, in open and democratic process, like what have had happened in respect of SEG representative selection from local and national NGOs.

ISCG should also not misinterpret "national NGO" to some locally born international NGO and locally registered INGO who is part of international federation or global attribute, for representation.

Please note that CCNF has handed over memorandum to the Under Secretary General Mr. Mark Loo Cook, UN Secretary General Mr. Anotinie Gutteres and even to the visiting delegation of UN Security Council on representation and participation of local NGOs. **We have defined of local NGOs in view of IASC approach, i.e. local means NGOs who have originated from Coxsbazar. These demand have been raised to promote civil societies in Coxsbazar.** Historically due to UN and INGO presence in Coxsbazar, CSO growth in Coxsbazar significantly low. So our key demand fulfillment should not be fabricated and deluded. We feel local and national NGOs should handle the whole field operation, with preference to local NGOs, while UN agencies and INGOs should be limited to monitoring and technical assistance.

JRP 2020 could have taken notes from CCNF, a network of local and national NGOs and CSOs (Civil Society Organization) and is formed long before NGOP. CCNF has been promoting localization and peaceful co-existence with human right both at local and national level. CCNF do not like to be dependent upon foreign fund as it will enhance CCNFs mass credibility and acceptability to the local power structure and policy leaders while promoting human right and refugee right in Bangladesh is very critical. CCNF have organized around 13 public events and 10 grass root mobilization on these issues. Grand Bargain commitments recommends to **reinforce the existing institutions and capacities rather than creating new one.**

We strongly recommend ISCG to include **thirteen additional issues**, i.e.

- (i) **Peace building** especially to address peaceful co-existence, security and conflict issues. This sector should embody with three courses of actions, social cohesion, education and networking on campaign against extremism and criminalization.
- (ii) **Environmental restoration** to promote conservation and regenerations. We believe that there are a lot of scopes and creativity available in this regard.
- (iii) **Host community sector** to ensure 25% of JRP to invest in host community and without any disproportionate approach. People have questions about it and therefore these components should not be kept along with preparing separate development plan for Cox's Bazar. There should be **a hub to examine and scrutinize all projects by Deputy Commissioner's Office** to ensure the inclusion of host community issues. **There should be priority setting for the host community too.**
- (iv) We also believe that, **site management or camp management sector should be emphasized for security issues,**

- (v) In **health sector, family planning should get much more attention.**
- (vi) There should be a **separate sector on adolescent and youth** who constitute almost 50% of the population and need special education and awareness on health especially on how not to be captured terrorism and criminal activities.
- (vii) ISCG must disclose the **overhead or management cost in the JRP 2020. They must plan on how to gradually reduce the cost by taking the policy of effectivity to efficiency and localization.**
- (viii) There should be a section on strategy to identify and ensure that other interventions are not **overlapping with non JRP implementators**, as there are organizations who have not participated or not included in the JRP.
- (ix) There should also be a **strategy on local procurement and a comprehensive plan to support the production in Cox's Bazar then in other districts to be supplied to camps.** Overall local and national economy could be benefited from it. **Availability of any item should be checked at local or national level before taking any decision to import.**
- (x) ISCG also should disclose **what percentage of the fund will be implemented through partnership with local NGOs and local government.**
- (xi) There is section on national NGO participation in ISCG and HoSoG meeting. So far, we have observed that the handpicked partners have been the major participants in those meetings. **The NGO representation selection should be done in transparent and democratic process, as what have been followed during selecting local and national NGO representation in SEG (Strategic Executive Group). To ensure open and equal participation of local, national and international NGOs, ISCG should consider i.e., three categories of NGOs.**
- (xii) On our enquiry it was said that NGO Platform (NGOP) is the representation of NGOs in ISCG and HoSoG. **We have reasons to think that NGOP based representation and advocacy is hardly appropriate and sustainable.** We have following reasons in this regard,
 - (a) NGOP has formed though a FD7 process and that's why it needs to strictly comply with NGOAB (NGO Affairs Bureau) or government regulations which might restrict it to reflect free and fair opinion. Moreover, it is hosted by an international NGOs and is dependent on foreign fund.
 - (b) As NGOP tried but succeeded little in access to high level policy makers in the country. This has happened as because of its inherent limitations.
 - (c) On the other hand, CCNF has proven track record and capacity of advocacy on human and refugee rights which was crucially needed and it has achieved a greater acceptability for its inclusiveness, timing and representational characteristics. Moreover, this forum doesn't depend on foreign funding and that's why it is an independent advocacy group. So, this existing independent and homegrown capacity should be recognized and emphasized by ISCG and other bodies.
 - (d) Concern on governance and due diligence in election process of NGOP is already raised, which created confusions and contradictions. CCNF leaders have joined to NGOP with much hope that was faded away later. Several time we have raised the issues of participatory review of NGOP, which is ignored.
- (xiii) There is an example of direct communication by ISCG to all involved national and local NGOs to nominate their representation in SEG (Strategic Executive Group) and after that, the selection has been fairly done in an open meeting. ISCG should not put different logic for the case of NGOP while having this example in their hand. And they should not have any problem with CCNF since it has consistent record of advocacy, acceptance and access to high level policymakers and finally it is a homegrown and localized entity.

ISCG should avoid all these debate and confusion, must have direct relation to local, national and international NGOs and ask them to select their representation for ISCG and HoSoG in an open and democratic process.

4. Potentialities of localization in Rohingya response: participation of local government and local NGOs

Since the beginning of August 2017 influx CCNF is pleading for implementation of Grand Bargain (GB) commitments, Charter 4 Change (C4C) and UN's NWoW in the humanitarian response. **According to CCNF, localization is possible here as there is no arm conflict, local community became the first responder to the crisis and government has a great sympathy for the persecuted.** Grand Bargain field demonstration mission in Bangladesh during September 2018 has given specific recommendations in this regard. **SEG has already commissioned a Localization Task Force (LTF) having UNDP and IFRC Co-chair and UNDP has already funded a consultant team to provide the final road map proposal by March 2020 (now it have differed again).** CCNF has concern about effective implementation of localization until and unless implementing and considering following four aspects:

- (i) **Rigorous sensitization on GB, C4C and NWoW** among the officials of all involved agencies are needed. CCNF feels that such an awareness is fundamental.

- (ii) There should be a clear **differentiation of “National” and “Local” NGO in view of IASC (Inter Agency Standing Committee) definition** as Bangladesh is the country of booming NGO sector. The local organizations should be given importance in the Rohingya response, as they are originated in Cox’s Bazar. There should be involvement of national NGOs as well. In fact, we propose the local and national NGOs should implement the entire field operation, while UN agencies and INGOs should provide with the monitoring and technical assistance, which is also very important.
- (iii) Along with other different reasons, especially due to the operational presence of UN agencies and INGOs in Cox’s Bazar since 1992s, the growth of local NGO in this district is lower than that of others. There are only 7 NGOs in Cox’s Bazar registered with NGOAB (NGO Affairs Bureau) but in other districts the number is more than 10. Therefore, we have been proposing for a **NGO Pooled Fund in Cox’s Bazar** since the beginning to enable the local organizations to grow and stand for the human/ refugee rights in future.
- (iv) We observed a tendency of **misinterpretation of localization**. Some are considering the appointment of local staff in international agencies is localization, but that is not. In fact, it is the matter of a level of role and participation of local organizations and local government in the decision making process.

But meantime, in respect of finalizing the JRP 2020,

- (i) There should be mentioning of LTF and how its incoming recommendations will be implemented. **Localization should be a planned effort rather than it is implemented alternatively to cope with shrinking aid.**
- (ii) There should be deliberate and immediate effort to **include Local Government / NGO representatives in regular HoSoG and ISCG meetings**, and
- (iii) While SEG and others do advocacy for the access, there should be **special focus on definition of Local NGOs** as mentioned above.

5. Urgent need, Pre-fabricated vertically extended structure for shelter, Self-reliance / economic activities for Rohingya family, full-fledged education in Myanmar curriculum and travel document as a refugee for Rohingyas.

Our government has awarded with the name and fame for giving the Rohingyas shelter which is a great reputation for the country and which will somehow impact the future course of development and international cooperation for the country. We also appreciate and feel encouraged that government has allowed agencies for mid-level education for Rohingyas. **We think it should be a full-fledged education with Myanmar curriculum.**

In line with this, **we urge our government to think to create scope of providing shelter with pre-fabricated vertically extendable structure** in the camps to save some spaces and release the congestion, which is in fact the mother of all problems. The government should also allow some sort of **self-reliance/ economic activities for Rohingya families in the camps, so that** they are less dependent on aid and above all they remain busy. We do not want “idle brains as devil's workshops” especially they should not be exposed to get involved with any criminal activities and terrorism.

We also urge **government to allow Rohingyas to obtain a Refugee Travel Document so that they can travel to abroad. This will reduce the desperate attempts of obtaining Bangladesh Passports in illegal ways. Government should encourage family reunion in other countries and attempts of third party repatriation.**

We feel that, all of the above facilities will give them a sense of human dignity and that will ultimately reduce the level of desperation that drive few of them to trafficking and other criminal activities.

Donors should positively engage with the government, assist and assure funding for the above mentioned proposals and also the campaign on the prosecution of Myanmar Junta for genocide. Bangladeshi civil societies are positive in this regard, they have already raised voice and as a result of their mobilization government has signed an agreement with UNHCR and positively respond to the ICC (International Court of Criminals).

6. Dismal picture of localization: UN and INGOs must have a declared Partnership Policy for Rohingya Response to promote human / refugee right-based sustainable and accountable NGOs especially in Cox's Bazar in long run.

Although SEG has formed the localization task force but it is not reflected in JRP 2020. The last two JRPs had at least something on this. The field of Rohingya response could be a unique opportunity for implementing localization as UN has given commitment in Grand Bargain and in NWoW. Since its inception CCNF has been raising this issue. In December 2019 i.e. after 28 months of influx and 6 months of localization task force formation, COAST Trust conducted a survey on partnership and response operation in this field. Data is collected from all 34 camps and all 11 unions in Ukhiya (5 unions) and Teknaf (6 unions) on the types of partnership among different UN agencies, INGOs, NNGO and LNGOs. Survey findings are presented in the bellow charts:

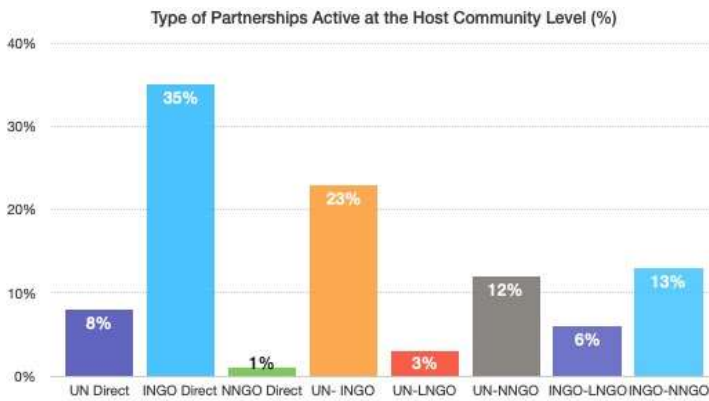


Figure 1: Type of partnerships active at the Host Community level (%)

In the host community areas, we have found total 198 partnerships to implement different development projects. Partnership with LNGOs are only 16 (8%)! On the other hand, number of UN-INGOs is 46 (23%), INGOs are directly implementing 70 projects (35%). UN NNGO and INGO NNGO partnership is also 12%.

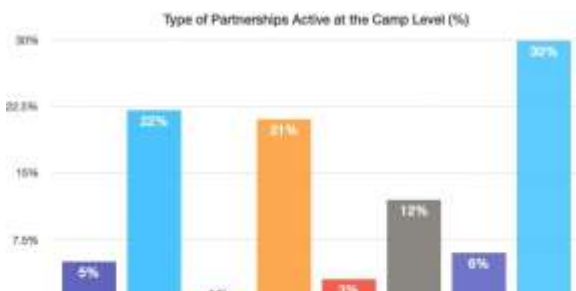


Figure 2: Type of partnerships active at the camp level (%)

In the camp level we have found 367 number of partnerships where the number of INGO-NNGO partnership is the highest 110 (30%). Partnership with local NGOs is only 33 (9%).

This is a clear contradiction of policy declaration and in fact “Internationalization or aid” approach in Rohingya response. UN agencies and INGOs need to keep their commitments reflected in Grand Bargain, Charter 4 Change and NWoW.

We have been demanding for **NGO pooled fund in Cox’s Bazar** to enable a planned effort to develop more NGOs based on human / refugee right. If we can do so, more local civil society

organizations will be developed and in turn it will be a sustainable and better protection for Rohingya refugees in Cox’s Bazar.

A rule based treatment / partnership policy is fundamental to promote local civil societies. Many local NGOs grieved on NGOs the partnership selection process of INGOs and UN agencies which is hardly transparent, criteria-based, futuristic with sustainability and competitive in nature. Lack of Conflict of Interest Policies and easy accessible Complaint Response Mechanism of the international organizations are there along with the allegations of cronyism. In respect of media focus and visit of dignitaries, UN agencies and INGOs rarely recognized the role of local and national NGO partnership. Most of the time it is sub-contractor agreements and imposition of a lot of unequal conditions which is not within the frame of Principle of Partnership (2007) and Charter 4 Change (2015). While there is a need to develop local NGO / CSOs in Cox’s Bazar UN agencies are giving hardly equal treatments to the local, National and International NGOs. There are instances that agencies invited concept notes from everyone but gave the project to their favorite NGOs using a better concept note submitted by other. Staff poaching from local NGOs is rampant even sometimes without maintaining minimum ethics notice period. An equal relationship respecting mutual dignity and minimum rule based treatment is fundamental to promote responsible civil societies. **UN agencies and INGOs must have a declared Partnership Policy considering the Rohingya Response as a protracted crisis and to promote a Sustainable and Accountable Local Civil Society in Coxsbazar who respect and do advocacy for Human / Refugee rights.**

Open and easily accessible Complaint Response Mechanism of the agencies are hardly available for the affected populations and the local public. The existing partnership practice is hardly complying with the Principle of Partnership (an agreement signed by major UN agencies and INGOs in 2007). Open and easily accessible Complaint Response Mechanisms in local language will ensure the accountability of the organizations.

Approach toward the “**Capacity**” should be redefined, as **Humanitarian Policy Group has proposed it should be “Capacity Exchange”** rather than capacity development. Often it is said that local NGOs has lack of capacity, in fact which undermine the fact that, local NGOs has best understanding on local knowledge and navigation within the power structure and above all by nature they are accountable to the local people and sustainable. On the other hand, “Capacity Development” is a bit top down and blind to the locally needed capacities. **We need “Capacity Convergence”.** We never deny the role and need of UN agencies and INGOs in this regard.

7. Public concern on high transaction cost, aid transparency to respect public accountability and progressive course of actions to reduce the cost

According to financial Tracking Services of UNOCHA, different donor agencies funded to Rohingya response in Bangladesh. During 2017 to 2019 a total fund of 1,975.6 million USD is received for Rohingya response. That means, USD 9,997 (787,469 BDT) has come for each Rohingya family through JRP and other sources for that time period. **To be more specific, average USD 441 (BDT 37, 044 BDT) was supposed to be allocated for a Rohingya family per month during September 2017 to December 2019.**

Funding Status of Joint Response Plan from 2017 to 2019

Areas	JRP 2017 ¹ (USD)	JRP 2018 ² (USD)	JRP 2019 ³ (USD)	Total
Total plan (million)	434.1	950.8	920.5	2305.4
Total Received (million)	494.2	727.7	753.7	1975.6
Fund Per Rohingya family	2940	3,481	3,576	9,997
Per Rohingya refugee	685	803	825	2313
Per Rohingya family per month	735	290	298	(avg.) 441
Per Rohingya refugee per month	171	66	69	(avg.) 102

Source: <https://fts.unocha.org>

We demand transparency on what are the **yearly direct input cost to refugee families**, what are **the management/overhead cost** of fund and what are **the partnership cost**.

People's general assumption is the management cost of UN agencies and INGOs is very high. One government high official said in a newspaper report that it is around 65%. Recently TIB (Transparency International Bangladesh) too has announced such an observation.

There should be planned effort to reduce expatriate and transfer their technical know-how to the locals.

We propose, UN agencies and INGOs should establish a system of regular disclosure on their finance, vehicle and expatriate information. The general concern is, **there should be a planned effort for a Road to Effectivity to Efficiency and gradual technology knowledge transfer to the locals. And this is the process of gradually reducing the transaction cost of every dollar reaching to refugee families.** JRP has very little indication on the **plan of trying out to reduce the transaction cost even there are scopes**, e.g.

- (i) Almost all of the agencies have their own sub-offices established in Cox's Bazar while they have offices in Dhaka. Having more than eight flights per day between Dhaka and Cox's Bazar, **agencies could consider whether they need such offices in Cox's Bazar.**
- (ii) Most of the aid workers and officials live in Cox's Bazar and go down to the camps on daily basis that takes four hours of their daily working time and moreover it is a huge burden on the small city. As in the most of other refugee operations in the world, the aid workers live in nearby areas of the camps, **operational staff/offices of the responding agencies could be shifted to Ukhiya or Teknaf.**
- (iii) **There should be coordination among UN agencies and INGOs on logistical arrangements.** There are huge grievances among the locals on the availability of vehicles they travel to and on traffic congestion in the road to Ukhiya.
- (iv) Staff salary in the response program is around 267% above than the normal disaster response and NGO structure in the country. **Policy makers have to think on whether such level of salary structure is sustainable for the future** and
- (v) **There are possibilities on reducing expatriate involvement in the operation.** In fact, there is no assessment to determine whether or how much the expatriate positions are needed. There are hardly any process of technology and know-how transfer to the locals so that in future the need of expatriates is reduced.

The End

¹ According to UNHCR, 721,944 Rohingya individuals and 168,090 families were in Bangladesh as of 31 December 2017.

² According to UNHCR, 906,572 Rohingya individuals 209,078 families were staying in Bangladesh as of 31 December 2018.

³ According to UNHCR, 913,080 Rohingya individuals and 210,739 families were staying in Bangladesh as of 31 August 2019.