LOCALISATION
ROADMAP

Humanitarian Response in Cox's Bazar

Localisation Roadmap for Humanitarian Response in Cox's Bazar

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LOCALISATION ROADMAP FOR HUMANITARIAN RESPONSE IN COX'S BAZAR

CPJ RESEARCH TEAM

Muhammad Badiuzzaman, Research Coordinator
Manzoor Hasan, Executive Director
Mohammad Azizul Hoque, Research Associate
Mofaq Kharul Islam, Project Manager
Dr. Sanaul Mostafa, Honorary Fellow
Jessica Olney, Visiting Researcher

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List of Abbreviations

BDRCS	Bangladesh Red Crescent Society
BNGOs	Bangladeshi Non-Government Organizations
BWHP	Bangladesh Women Humanitarian Platform
C4C	Charter 4 Change
CB	Cox's Bazar
CBO	Community-Based Organisation
CBPF	Country-Based Pooled Fund
CCNF	Cox's Bazar CSO and NGO Forum
CiC	Camp-in-Charge
CPJ	Centre for Peace and Justice
CSO	Civil Society Organisation
DAE	Department of Agricultural Extension
DC	Deputy Commissioner
DREF	Disaster Relief Emergency Fund
ERD	Economic Relations Division
FGD	Focus Group Discussion
GB	Grand Bargain
GHP	Global Humanitarian Platform
GO	Government
GoB	Government of Bangladesh
HR	Human Resource
IASC	Inter-Agency Standing Committee
IATI	International Aid Transparency Initiative
ICJ	International Court of Justice
IFRC	International Federation of Red Cross and Red Crescent Societies
INGO	International Non-Government Organisation
IOM	International Organisation of Migration
ISCG	Inter Sectoral Coordination Group
IT	Information Technology
JRP	Joint Response Plan
KII	Key Informant Interview
KPI	Key Performance Indicators
KSL	Knowledge, Skills and Learning

LD	Localisation Driver
LG	Local Government
LNGOs	Local Non-Government Organisations
LTF	Localisation Taskforce
MLC	Monitoring and Learning Cell
MoV	Means of Verification
MSF	Medecins Sans Frontieres
NGO	Non-Government Organisation
NGOAB	NGO Affairs Bureau
NNGOs	National Non-Government Organisations
ODI	Overseas Development Institute
PMO	Prime Minister's Office
PoP	Principles of Partnership
Q&A	Questions and Answers
RBM	Results Based Monitoring
RHR	Rohingya Humanitarian Response
RRRC	Refugee Relief and Repatriation Commissioner
SEG	Strategic Executive Group
SHG	Self-Help Groups
SMS	Site Management Sector
SWOT	Strengthens, Weakness, Opportunities and Threats
TOR	Terms of Reference
TOT	Training of Trainers
UN	United Nations
UNDP	United Nations Development Programme
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Fund
USD	United States Dollar
UZ	Upazila Parishad
WASH	Water, Sanitation and Hygiene
WB	World bank
WFP	World Food Programme
WHO	World Health Organisation

Acknowledgement

Centre for Peace and Justice, Brac University undertook the preparation of 'Localisation Roadmap of Humanitarian Response in Cox's bazar' with trepidation. The task has been accomplished and I express our gratitude to all those involved during the process for their generous contributions. We are extremely thankful to the members of the Localisation Taskforce (LTF) for their valuable and candid suggestions, which has resulted in this rich and focused research report. The assignment was deftly taken forward under the stewardship of Mr. Sudipto Mukerjee, Resident Representative of UNDP, Bangladesh and Mr. Azmat Ulla, Head of Country Office, IFRC, Dhaka.

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Needless to mention, CPJ will remain indebted to the Host and Rohingya communities for their unflinching commitment to the compilation of this research report, and we are confident that future activities based on this report will vindicate their trust. Finally, this report has embodied the passion and vision of CPJ team members, and I take this opportunity to put it on record.

Manzoor Hasan
Executive Director, CPJ
Brac University

Executive Summary

Introduction

Localisation has been widely recognised as a strategy toward achieving effectiveness, efficiency, transparency and equitable participation in aid due to the unique capacities of local actors to understand and respond to the needs of conflict and disaster-affected populations. This summary report is a guiding policy document prepared by Centre for Peace and Justice (CPJ), Brac University that outlines a roadmap for the localisation of humanitarian response in Cox's Bazar, Bangladesh. The roadmap is the result of multi-stakeholder consultations and key informant interviews conducted on the topic of localisation in Cox's Bazar and Dhaka, Bangladesh by CPJ from December 2019 to March 2020.

The **Localisation Roadmap** builds on previous leadership, notably the recommendations made by the UN-led Grand Bargain 2018 Bangladesh Mission Report and the activities undertaken by the Localisation Task Force (LTF) formed under the leadership of International Federation of Red cross and Red Crescent Societies (IFRC) and UNDP-Dhaka and comprised of donors, UN agencies, international NGOs, and Bangladeshi NGOs. This summary report summarises the 11 outputs and workplan that constitute the Localisation Roadmap. It is complemented by a full final report that documents the views and perspectives of all stakeholders consulted during the research process, and by a comprehensive desk review that analyses key global frameworks and literature on localisation.

Due to varying interpretations and views, the **Localisation Roadmap** presented by CPJ will likely not result in consensus amongst all stakeholders, and this is not the goal. Rather, the roadmap offers an opportunity for all actors to find common ground and unite around the shared goal of improving efficacy and efficiency resulting in better outcomes for the affected Rohingya refugee[1] and host community populations.

Methodology snapshot

The Localisation Roadmap was designed and this report drafted based on consultations and key informant interviews (KIIs) with a wide range of stakeholders. Rohingya refugees, host community members, local, national and international NGOs, donors, government, and UN agencies were all included in the research process as follows:

- 13 consultation workshops with donor, humanitarian and government stakeholders
- 4 focus group discussions with host and refugee community leaders
- 15 key informant interviews with individuals possessing relevant insight on localisation

Each consultation and interview was conducted according to a loosely structured format in which CPJ first explained the concept of localisation, then asked participants to share their thoughts on how it may be carried out in the Cox's Bazar context.

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[1] Government of Bangladesh describes the Rohingya population, who arrived since 2016, as the Forcibly Displaced Myanmar Nationals (FDMN). However, this report uses the word 'refugee' for ease of reference and in a non-legal sense.

Background: The global movement calling for localisation

Localisation proponents around the world envision a power shift in which humanitarian decision-making, leadership, and control over resources are transferred away from international INGOs and toward affected and local populations around the globe. Envisioning that humanitarian action should be as 'localised as possible, and as international as necessary', an agreement called the Grand Bargain was drafted at the 2016 World Humanitarian Summit in recognition of the need for humanitarian financing to be more efficacious and cost-effective as global fragility increases and aid dollars are stretched. The Grand Bargain was ratified by over 62 parties including 25 states, 11 UN Agencies, 5 inter-governmental organizations, Red Cross/Red Crescent Movements and 21 NGOs. [2] It has 51 commitments across nine workstreams, the second of which is for "more support and funding tools to local and national responders." [3] Six of the commitments fall under this workstream : [4]

- Increase and support multi-year investment in the institutional capacities
- Reduce barriers
- Strengthen coordination
- Targeted funding
- Track funding
- Pooled funds to increase accessibility

The Grand Bargain was the result of focused advocacy on localisation over the previous decade. It was preceded by the Global Humanitarian Platform (GHP), launched in 2006 to elevate recognition of the important role played by local and national responders in crises. The GHP developed the Principles of Partnership (PoP) [5] to articulate a vision for engagement between international and local responders. The five PoPs are equality, transparency, results-oriented approach, responsibility and complementarity. The Charter 4 Change (C4C) [6] launched in 2015 built on the PoPs by calling for specific commitments by international humanitarian agencies to fulfil by 2018, such as passing at least 20 percent of their funding through national actors and providing robust organisational development and capacity building support.

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[2] IASC. Grand Bargain (Official Website). Available at: https://interagencystandingcommittee.org/grand-bargain (accessed on 4 September 2020)
[3] IASC. More support and funding tools for local and national responders.
https://interagencystandingcommittee.org/more-support-and-funding-tools-local-and-national-responders
[4] IASC. More support and funding tools for local and national responders. Available at:
https://interagencystandingcommittee.org/more-support-and-funding-tools-for-local-and-national-responders (accessed on 04 September 2020)
[5] UNHCR. (2007). Principles of Partnership: A Statement of Commitment (p. 2). Geneva, Switzerland: UNHCR. Available at:
https://www.unhcr.org/5735bd464.pdf (accessed on 04 September 2020)
[6] Charter4Change. (2017). Charter for Change: From Commitments to Action. United Kingdom: CAFOD UK. Available at:
https://cafod.org.uk/content/download/42149/478066/version/2/file/C4C_ProgressReport_2017_WEB.pdf (accessed on 04 September 2020)

Overview: Localisation progress and advocacy in the Rohingya humanitarian response

Since the early days of the current Rohingya humanitarian response in Cox's Bazar, Bangladesh, localisation proponents point out that host communities and Cox's Bazar-based organisations were the first responders responsible for sheltering and caring for the scores of refugees entering the district to escape persecution and violence in Myanmar. This, combined with the nation's strong expertise and human resources in the development sector, rendered Bangladesh an ideal 'demonstrator country' for localisation, and it was one of three countries selected as such by the Localisation Workstream members[7].

In order to begin guiding the localisation process of the Cox's Bazar response, a multi-agency mission was undertaken by nine members of the workstream from 8 to 13 September 2018. The final report by the mission makes the following recommendations:

1. For institutional donors and bilateral donor agencies to: 1) have partnership agreements that integrate good practices that support leadership and capacity of local and national humanitarian actors; 2) increase the proportion of unearmarked and multi-year humanitarian assistance through direct or as-direct-as-possible (one transaction layer) partnerships with national and local actors or through country-based pooled funds; and 3) work with the UN Resident Coordinator and government to continue strengthening local and national leadership.

2. For UN agencies and International NGOs to develop ethical human resource standards relevant to surge, support mutual capacity strengthening systems, put in place more flexible, contextualized and inclusive coordination mechanisms, improve access to and engagement with the humanitarian donor architecture for the local and national actors, provide fair coverage of overhead costs, and foster the engagement of women through the work of the Bangladesh Women Humanitarian Platform (BWHP).

3. For local and national actors to 1) work with smaller local humanitarian actors in a transparent and equal manner; and 2) use existing networks to come up with a common definition of local and national actors, and to agree on ways on how to better collaborate, respect and build on one another's strengths.

4. For the Government of Bangladesh to identify opportunities to strengthen local and national leadership and decision-making in humanitarian action, including the enabling and regulating role of the NGO Affairs Bureau. [8]

The mission report also calls for: longer funding timelines (three years) to allow time for an incremental transition toward localisation; support for capacity building of local and national actors on refugee protection and rights; and targeted investments to help local and national organisations scale up. The report also notes the apparent lack of gender balance within the localisation movement and calls for local women's voices to be included in planning processes. [9]

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[7] IFRC. (2018). MISSION REPORT Grand Bargain Localization Workstream Demonstrator Country Field Mission Bangladesh. Dhaka, Bangladesh. Available at: http://media.ifrc.org/grand_bargain_localisation/wp-content/uploads/sites/12/2018/11/Final-Mission-Report-Bangladesh.pdf (accessed on 04 September 2020)

[8] Grand Bargain Localisation Workstream (2018). Mission Report, September, p. 4. Available at:
http://media.ifrc.org/grand_bargain_localisation/wp-content/uploads/sites/12/2019/07/Bangladesh-Mission-Report.pdf. The Localisation Workstream co-conveners in Bangladesh include the International Federation of Red Cross and Red Crescent Societies (IFRC) and the Swiss Agency for Development Cooperation (SDC), with support from National Alliance of Humanitarian Actors in Bangladesh (NAHAB), COAST Trust, Bangladesh Red Crescent Society, the Office of the UN Resident Coordinator, IFRC, Oxfam, and Christian Aid.

[9] Grand Bargain Localisation Workstream Mission Report, p.4.

The mission report recognises successes in various areas within the Cox's Bazar response: progress in local-international partnerships, capacity strengthening efforts, financing availability to local and crisis-affected stakeholders, and the inclusion of local actors in coordination mechanisms. [10]

Other reports by think tanks and humanitarian policy advisors have also sought to contribute recommendations to the localisation process in Cox's Bazar. A 2018 report by the Overseas Development Institute (ODI), 'Capacity and complementarity in the Rohingya response in Bangladesh', evaluates the response against the Grand Bargain framework. [11] The authors recommend a shift in focus from 'capacity building' of local actors, which can be unidirectional, toward 'capacity exchange' in which the unique capacities of different actors are recognised and exchanged. The authors describe a trust gap between Rohingya, host, local, national and international responders that impedes recognition of utilisation of these actors' mutual complementarity.

The ODI report also notes that a restrictive policy environment hinders spaces in which capacities of the affected populations could be developed. This exacerbates power imbalances, particularly as they relate to refugee participation, rights and protection. This exclusion produces a localisation discourse that risks failing to centre the well-being of refugees themselves, calling into question the goals of localisation and who stands to benefit. As the authors note, 'Discussions around capacity, complementarity and localisation are only relevant insofar as they remain firmly grounded in meeting humanitarian needs and serving the needs of affected populations.

Building on the guidance provided by the global frameworks and prior analyses of localisation in the Cox's Bazar response as described above, the **Localisation Roadmap** provides a pragmatic and detailed process by which the Mission Report and other recommendations can be achieved.

Results framework of the Localisation Roadmap: A snapshot

The **Localisation Roadmap** consists of impact goals, outcomes, outputs, and activities to be pursued via an initial three-year plan (see pages 9-13). They establish a framework that all stakeholders agree to uphold. The outcomes, outputs, and activities have been designed as ways for incremental progress to be made toward the two impact goals. Key performance indicators (KPIs) have also been developed for each step to establish benchmarks for measuring progress. Rationale, targets and baselines are also elucidated for each of the 11 outputs.

As localisation is a strategy toward achieving better humanitarian outcomes, the two impact goals relate to improved quality of life for both Rohingya and host communities. Accordingly, the three overall outcomes to be realised as a result of the roadmap will be that: 1) local actors to deliver humanitarian services within the Rohingya response; 2) local actors deliver development and livelihood services to host communities; and that 3) these services are efficient and effective, providing high value for money. The 11 outputs and activities each contribute toward the attainment of these outcomes.

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[10] Grand Bargain Localisation Workstream Mission Report, Annex 1.

[11] Wake, C and J Bryant (2018). Capacity and complementarity in the Rohingya response in Bangladesh; Humanitarian Policy Group, ODI. Available at: https://www.odi.org/sites/odi.org.uk/files/resource-documents/12554.pdf (accessed on 04 September 2020)

Output	Synthesis of consultation findings
1. Capacity exchange and professional development	All actors build enhanced capacities in areas of programme management, institution building, sectoral technical expertise in humanitarian assistance, and protection and gender issues in order to serve refugees. Ongoing learning opportunities should be made available for all organisations and staff to build new competencies and undertake professional development. In the case of local actors, donors may offer workshops to inform them on financial and management systems, monitoring protocols, and other technical competencies required for funding eligibility. Other workshops could be held to sensitise staff on refugee rights frameworks, global humanitarian principles and trauma-sensitive community engagement. In turn, local and national actors could offer trainings for international actors to develop better technical skills based on contextual awareness and cultural sensitivity. Coming together in a learning setting will help build trust amongst actors. The provision of these training services at the response-wide level will also help ensure that smaller organisations are not impeded by staff turnover.
2. Formation and development of voluntary Rohingya self-help groups	Rohingya self-help groups (SHGs) are conversant with humanitarian principles, group management and respective areas of sectoral and technical engagement, and willing to collaborate with camp-based service providers including local actors in various areas. Localisation is effective to the extent that affected populations experience better outcomes and improved quality of life. Rohingya people have been thus far excluded from engaging in planning and decision-making in the humanitarian response. This presents a barrier to the goal of localisation, which seeks to empower and centre the voices of affected populations. The engagement of Rohingya themselves is needed not only to ensure that they experience improved outcomes as a result of localisation, but because greater self-reliance will improve the likelihood that sustainable repatriation can take place in the future. A mechanism is needed for Rohingya to participate more closely in humanitarian planning, decision-making and service delivery alongside local, national, and international actors. As the Rohingya crisis is cross-border in nature, Bangladeshi as well as international agencies must take time to learn about and learn from the Rohingya people. The refugees themselves have the best understanding of their own circumstances, priorities, and needs. Many of the Rohingya people consulted during the research process requested greater inclusion in response planning. One way to accomplish this is through the establishment of self-help groups with a formal link to the localisation process.
3. Cost-effective and innovative funding tools and mechanisms	Donors, UN agencies, and INGOs operate innovative funding mechanisms (e.g. pooled funds, direct funding, network funding) to engage suitable, capable and competitive local actors as partners. These funds address the needs of the Rohingya refugees, host communities and learning needs of the local actors and Rohingya self-help groups in a systematic manner. Pooled funds are multi-donor humanitarian financing mechanisms set up to harmonise proposal and reporting requirements in order to improve accessibility for local actors. Pooled and direct funding options as well as longer project timelines are a way to accelerate localisation because they reduce the high transactional costs inherent in the sub-granting model that currently prevails.
4. Effective camp management	All refugee camps are managed following humanitarian principles, policies, division of labour and guidelines jointly developed by government and other actors including Cox's Bazar-based NGOs, CBOs, CSOs, SHGs, national NGOs, INGOs and UN agencies. As the leading actor in the Rohingya response, government officials should be engaged in localisation alongside humanitarian actors. The support and involvement of site management personnel and camp authorities is needed for localisation actors to maintain camp access, gather community inputs, and track localisation progress at the camp level. Moreover, their engagement will help engender a camp environment conducive to collaborative action between local and international actors in partnership with affected communities.
5. Development services	Host communities have access to preferential status for suitable merit-based employment opportunities, as suppliers of agricultural goods for refugees (local procurement), sustainable household energy systems, community assets (e.g. roads) and institutions (e.g. community clinics, schools). Livelihood opportunities are needed for host as well as Rohingya community members in order to overcome aid dependency. Host community members should be supported to articulate and work toward their own development priorities, to participate in the humanitarian response, and to have their grievances addressed. Cox's Bazar and the whole of Bangladesh are suffering from the ripple effects of the Rohingya crisis, the climate crisis, and pervasive economic and social vulnerabilities. Localisation has the potential to address these coexisting threats by ensuring that environmentally sustainable, localised procurement, and contextually appropriate practices are integrated across the response, which has the potential to boost rather than harm the regional economy.

Output	Synthesis of consultation findings
6. Social cohesion	Host communities, represented by local government representatives (LGRs), are included in decision-making, are sensitive about the plight of the refugees and the necessity for expected humanitarian attitude towards them, and have a conflict resolution system in place. Despite humanitarian actors' widespread recognition of the need to build social cohesion between refugee and host communities, there remains little face-to-face interaction between the two populations. This limits opportunities for sensitisation, tolerance and sensible approaches to intercommunal coexistence. Localisation presents an opportunity for hosts and guests to develop mechanisms for resolving problems together, with the engagement and support of local government representatives. For example, a bimonthly town-hall system can be instated in which representatives of Rohingya CBOs and local CSOs engage in dialogue, hear from guest speakers, and are supported by a neutral third party institution.
7. Accountability	Government agencies including the RRRC, the NGO Affairs Bureau, local administration, and local government representatives are supportive of localisation initiatives and seek accountability from local and international service providers. Clear policies, efficient approval procedures, and transparency are needed for localisation to be effective. The localisation agenda will be expedited as clear accountability mechanisms are established. Donors require camp access for frequent monitoring to build trust as partners demonstrate their accountability. A culture of accountability can be bolstered as NGOs and other stakeholders agree to willingly uphold a set of standards on accountability and transparency. One way to ensure this is through adherence to the National Integrity Strategy of Bangladesh. [18]
8. Specialised knowledge, skills and services	Local and international actors engaged in humanitarian assistance have access to advanced knowledge and skills in the areas of humanitarian assistance, IT-driven management systems, and functional areas. Different actors are best positioned to provide certain services. Partnerships between local and international actors enable them to complement each other's strengths. Local and national specialists should be prioritised to the greatest possible extent. Talent may be sourced locally, nationally, and internationally as needed. In cases where international expertise must be sourced, it should be done in a manner that transfers experience and skills to a local or national counterpart. Equitable partnership also means that actors identify funding priorities and strive to meet them together, with inputs from affected populations.
9. Effective communication	All participating agencies engaged in the Rohingya humanitarian response practice an effective communication system (Rohingya, Bangla and English) equally understandable to the Rohingya refugees, government, host communities, and relevant international actors. Language and communication gaps must be addressed during the localisation process, because equitable engagement amongst stakeholders is impossible without adequate translation and interpretation. Standards and clear guidelines are needed in regard to language usage and communication between actors.
10. Learning and policy support	Bangladesh shares its internal learning from localisation with core stakeholders and has access to external learning and policy dialogues at the national and international levels. Bangladesh was selected as a 'demonstrator country' for a multi-agency group of Grand Bargain members to study localisation in detail. The lessons generated from Bangladesh's experiments with localisation in the Rohingya response can be shared for learning by actors in other contexts. As such, ongoing research and knowledge management should be undertaken to determine best practices and distil lessons learnt.
11. Establishment of a Localisation Driver	A Localisation Driver is based in Cox's Bazar and accountable to government and donors with suitable organisational set-up, terms of reference, policies and resources and available to facilitate the localisation process among all stakeholders. A Localisation Driver (LD) with a strong mandate, broad buy-in, and high-level management capacity is needed to translate the Localisation Roadmap into practice, but it should support and monitor rather than enforce. A strong link to government is likely needed to help the LD work smoothly. The LD should oversee implementation of the localisation roadmap, provide training and monitoring support, and ensure that tangible progress is achieved. Guidelines should also be provided for each agency to internally drive its own localisation process as well. The LD should establish a set of specific outputs during the Inception Phase to ensure that localisation becomes more immediately comprehensible, believable and appealing to all stakeholders.

[18] The document was published in Bangla by the Cabinet Division of the Government of Bangladesh in 2012. Available at:
https://cabinet.portal.gov.bd/sites/default/files/files/cabinet.portal.gov.bd/page/f5ea77bf_4afc_4a71_bd2b_00c20ea6d7b5/CD_SPEC_GOVT_POLIC_bn_2_195.pdf
(accessed on 05 September 2020). An unofficial English version is also available:
https://cabinet.gov.bd/site/page/7d7633ee-62b1-4d12-8e14-6590ae973106/National-Integrity-Strategy- (accessed on 06 September 2020)

Areas for future consideration

Establish baselines: Field-based and desk research is needed to establish baselines for the KPIs listed above (see Output 10). One gap in the qualitative data is a thorough understanding of what constitutes effective humanitarian support according to refugees and host communities. Once a better understanding is in place of how affected populations perceive service provision by local, national, and international actors, it will be possible to strategically work toward improvements and measure changes in their levels of satisfaction.

Reach agreement on the leadership of the Localisation Driver: A key decision is the composition of the Localisation Driver, which will be responsible for overseeing progress toward the roadmap goals (see Output 11). While it is outside of the scope of this report for CPJ to prescribe the precise leadership and management structure, inputs from many stakeholders were collected and three possible options were identified. A matrix with a full description of these options is on page 15.

1. Secretariat attached to the Inter-Sector Coordination Group (ISCG), based in Cox's Bazar
2. Project attached to RRRC, based in Cox's Bazar
3. Project attached to Cabinet Division / Economic Relations Division (ERD), based in both Cox's Bazar and Dhaka

Develop the training menu for capacity exchange: The localisation process presents rich opportunities for all humanitarian personnel in Cox's Bazar to develop new skills, and for all organisations to develop new institutional capacities (see Output 1). Through a process of capacity exchange, the Localisation Driver will enable local and international teams to engage in ongoing professional development.

For instance, donors may offer training on their financial management requirements that potential local grantees could take prior to submitting a proposal, whereas local organisations could offer a training for international personnel to develop culturally-sensitive capacities for engaging host communities. The Localisation Driver itself may also offer trainings for all actors to understand the importance and goals of the localisation process.

Management of pooled funds: As described in the Grand Bargain Localisation Workstream and in the Grand Bargain 2018 Bangladesh Mission Report recommendations, pooled funding is a key strategy for streamlining funding procedures and increasing the accessibility of institutional donor money by local actors (see Output 3). Again, CPJ cannot prescribe the mechanism by which pooled funds will be managed, but presents two options for consideration:

1. ISCG
2. A local agency to manage pooled funds

According to CPJ's analysis, the second option is better placed to take on this task. Under the MJF model, pooled international funds would be managed locally or nationally. Alternatively, MJF may be approached to advise the set-up of such a localisation fund. Donors must adhere to their own institutional requirements, which sometimes limit their ability to participate in pooled funds.

Assess participation opportunities for affected populations: An assessment is also needed to determine the skills, organizational development needs and priorities of local NGOs and their wishes for more direct participation in the response, host community representatives, and Rohingya self-help groups. These training needs will directly shape the capacity exchange agenda described in Output 1.

- **Confidence-building:** During the consultations, CPJ observed that nearly all stakeholders agreed that localisation is important, but that mistrust exists between multiple actors whose support is needed in order for localisation to proceed. In addition to the technical steps outlined in the roadmap, informal relationship-building and opportunities to work toward common goals can assuage the risk that the trust gap will impede the success of localisation. As localisation is a process involving many stakeholders, CPJ anticipates that consensus will be out of reach in some instances. This is to be expected. For example, embassies must adhere to institutional funding requirements that may challenge their ability to participate in pooled funding mechanisms.

- **Towards a Localisation Roadmap:** CPJ is of the opinion that there should be an interim arrangement prior to mobilisation of the localisation roadmap. Given the fact that the LTF has played such a critical and constructive role so far, CPJ recommends that it will be appropriate for LTF to guide the present process to put in place an institutional arrangement.

Localisation Roadmap: Results Framework

Summary	Performance Indicators (Baseline versus final)
Impacts **Impact 1:** Rohingya refugees live safely, free from suffering, and with dignity. **Impact 2:** Host community residents experience a sustainable livelihood.	• Morbidity rate is not higher than the local average. • Degree of satisfaction of the refugees with the services received. • Number of conflicts resolved is increased. • The number of cases of violence against women and children is reduced. • Household income in affected communities has increased at par with the national average. • The forest ratio is stable. • Host community residents express acceptance of refugees.
Outcomes • Outcome 1: Local actors deliver needs-based humanitarian services to Rohingya refugees in a concerted manner, each working in their areas of sectoral expertise. • Outcome 2: Vulnerable host community members receive supplementary livelihood services from local actors who address their loss of access to economic, social, physical, and natural capital due to the refugee influx. • Outcome 3: The delivery of humanitarian assistance for Rohingya refugees and development assistance for host communities is efficient and effective.	• Share of total humanitarian assistance budget spent through local actors increases. • Share of total budget spent on actions undertaken by Rohingya self-help groups increases. • Share of total budget spent on protection and gender activities is maintained. • Share of total budget spent for host communities. • Share of employment of host communities reaches 50%. • Budget used for local procurement of goods produced by Cox's Bazar-based farmers and traders increases. • Unit cost of delivery for a set of defined quality standards for various services reduces.

Outputs and activities	
Output 1: Capacity Exchange and Professional Development: Local actors demonstrate enhanced capacities in the areas of program management, institution building, sectoral technical expertise in humanitarian assistance, and protection and gender issues in order to serve refugees. **Activities:** 1.1 Provide needs-based and demand-driven basic and advanced trainings using Bangla as medium of communication. 1.2 Provide Training of Trainers to develop a team of certified local resource personnel to address the consultancy needs of local actors, such as policies on financial management, administration, procurement, conflict of interest, human resources, and gender. 1.3 Organise workshops and refresher trainings to update knowledge and skills. 1.4 Introduce an online self-learning portal for local actors for self-assessment and continuous learning.	1a. NGOs participating in the Rohingya humanitarian response (RHR) use a set of prescribed policies: finance, human resources, board of directors, gender, procurement system, conflict of interest, reporting. 1b. NGOs participating in the RHR use IT-driven results-based management systems for project design, monitoring and reporting. 1c. Staff members of NGOs participating in the RHR are certified/skilled in respective technical areas of operation. 1d. Cox's Bazar-based resource persons in various technical areas are available to serve as freelancers.

Output 2: Community building amongst Rohingya refugees: Rohingya self-help groups (SHGs) are conversant with humanitarian principles, group management and respective areas of sectoral and technical engagement, and willing to collaborate with camp-based service providers including local actors in various areas.

Activities:

2.1 Organise workshops to support Rohingya refugees, particularly youth and those with technical skills, to form self-help groups (SHGs) according to their areas of interest, such as first aid, nutrition, maternal and child health, adolescent girls, youth, food distribution, paralegalism, conflict resolution, senior and disability care, burial, repatriation, and birth registration.

2.2 Undertake a survey amongst refugees to create a human resource inventory differentiated according to various skill areas.

2.3 Provide training to SHGs on group management, group leadership, humanitarian principles and need-based specific sectoral skills including education using Myanmar syllabus and language.

2.4 Seek recognition of groups from the Government to operate in the camps as a complementing organ in the implementation of humanitarian assistance.

2.5 Introduce smartphone-based online self-learning portal for SHGs to access continuous learning and share experiences.

2.6 Organise a quarterly coordination meeting of the SHGs.

2a. SHGs preferred by refugees in different areas.

2b. % of SHG leaders who can describe roles, human principles and how they will provide services, if needed.

2c. % of SHG members who participate in meetings to discuss and review activities regularly.

Output 3: Cost-effective and innovative funding tools: Donors, UN agencies, and INGOs operate innovative funding mechanisms (e.g. pooled funds, direct funding, network funding) to engage suitable, capable and competitive local actors as partners. These funds address the needs of the Rohingya refugees, host communities and learning needs of the local actors and Rohingya self-help groups in a systematic manner.

Activities:

3.1 Develop standardised guidelines, operational and compliance procedures for innovative funding tools (calls for proposals, assessment systems and rewards modalities) by donors, UN and INGOs.

3.2 Provide workshop for local actors (national and Cox's Bazar-based NGOs) on online bidding procedures (in Bangla or English).

3.3 Encourage local actors to enlist in a database online differentiated according to geographical focus and profile (areas of expertise, state of IB, organisational development, programme management capacity, awareness about humanitarian principles, etc.) and update their profile regularly.

3a. % of local actors who can download information online about a) types of funding, b) application systems, c) assessment systems and d) reward systems available to them.

3b. % of actors who can view a database of local actors differentiated according to a) location of head office, b) target group, e.g., women, disability, children, c) women in leadership and d) area of specialisation.

3c. % of all local actors who can describe the criteria and process of accessing funding for various funding tools.

3d. % of all local actors' proposals that satisfy the funding criteria required by donors.

Output 4: Effective camp management. All refugee camps are managed following humanitarian principles, policies, division of labour and guidelines jointly developed by government and other actors including Cox's Bazar-based NGOs, CBOs, CSOs, SHGs, national NGOs, INGOs and UN agencies.

Activities:
4.1 Draw a three-year rolling plan to maintain physical, social and institutional infrastructure (shelter, WASH, school, health facilities, market, graveyard, SHGs, policies, security of women/girls/children, etc.) following standard guidelines developed in consultation with local and international actors, as well as with credible representatives of Rohingya communities.
4.2 Seek the services of the localisation driver to find suitable local actors from applicants, and of international actors where necessary to maintain services at camp level.
4.3 Allow the chosen local actors to facilitate the formation of Rohingya self-help groups in various technical areas to reach refugees with various services.
4.4 Establish and maintain informal conflict resolution system (intra-Rohingya, and Rohingya-host communities) in consultation with the parties.
4.5 Communicate policies of the government in view of living in the camp and repatriation.
4.6 Prepare and disseminate a monthly camp report to the stakeholders based using a template.
4.7 Provide support to the localisation driver and international actors.
4.8 Monitor the activities of the organisations operating in the camps, in view of their action plans and share observations in weekly meetings.
4.9 Introduce tri-lingual communication system in the camps with Bangla as the base.

4a. All camps have a 3-year rolling plan for the type of services needed, indicating the role of local actors, international actors, SHGs and local suppliers, along with budgetary requirements.
4b. All camps have a set of agreed values, principles and policies to govern the operations they should follow.
4c. All camps produce quarterly reports on the implementation of the plan and the compliance of the values, principles and policies.

Output 5: Development services to host communities. Host communities have access to preferential status for suitable employment, as suppliers of agricultural goods for refugees (local procurement), sustainable household energy systems, community assets (e.g. roads) and institutions (e.g. community clinics, schools).

Activities:
5.1 Develop and introduce a common recruitment policy to engage local people in the Rohingya humanitarian response associated with capacity building and continuous education.
5.2 Introduce a farming system or crop diversification model for profitable farming using the services of the Department of Agricultural Extension.
5.3 Encourage the private sector and farmers to participate in the supply chain for products to be delivered to Rohingya refugees associated with capacity building for bidding.
5.4 Support development of host community infrastructure as prioritized by the community (e.g. roadside plantation, school development, road development, community clinic, sustainable household energy systems).

5a. % of Cox's Bazar-based employees increased, including participation of x number (M, F) in management position.
5b. % of local farmers and traders of locally produced agricultural goods.
5c. % of host community households using subsidised improved fire stoves.
5d. % of villages connected to rural roads and markets.

Output 6: Social Cohesion. Host communities, represented by local government representatives (LGRs), are included in decision-making, are sensitive about the plight of the refugees and the necessity for expected humanitarian attitude towards them, and have a conflict resolution system in place.

Activities:

6.1 Organise regular ward-level community meetings with the involvement of LGRs on various aspects of the Rohingya humanitarian response to clarify the government's policy and roles arising for the communities.

6.2 Support regular meetings between the LGRs and representatives of Rohingya communities to discuss issues of mutual interest.

6.3 Establish a conflict resolution system engaging the LGRs, representatives of Rohingya communications, and camp administrator to address potential conflicts.

6c. # of monthly collaborative sports, cultural and social events between Rohingya and host communities.

6d. A conflict resolution system, as introduced by legal aid office of the district court, resolves conflicts (by CiCs and LGRs):

6e. % of conflicts within camps, excluding crimes.

6f. % of conflicts between refugees and host communities, excluding crimes.

Output 7: Accountability. Government agencies including RRRC, NGO Affairs Bureau, local administration, and local government representatives are supportive of localisation initiatives and seek accountability from local and international service providers.

Activities:

7.1 Advocate for a special window at NGOAB for accelerated processing of proposals related to Rohingya humanitarian response streamlined through an online application portal.

7.2 Organise workshops for NGOs to engage public officials as resource persons to clarify regulatory requirements for project proposals.

7.3 Report to CiCs, local administration, local government representatives and the community on the progress of implementation of activities for Rohingya and host communities on a regular basis.

7.4 Seek the support of local administration and local government representatives to resolve potential conflicts between the host and guest communities.

7a. Local actors and SHGs submit quarterly reports to the RRRC against their general refugee response work plans.

7b. Local actors submit yearly progress and audit reports to NGOAB against approved plan.

7c. Local actors submit quarterly host community reports and present to Upazila meetings.

7d. LGRs can describe which activities for host communities are being implemented by local actors.

7e. Local actors' board holds regular meetings and seeks the executives for Q&A on internal audit report.

7f. Local actors submit bi-annual program and financial reports to donors and quarterly internal control reports.

Output 8: Specialised knowledge, skills and services. Local and international actors engaged in humanitarian assistance have access to advanced knowledge and skills in the areas of humanitarian assistance, IT-driven management systems, and functional areas.

Activities:

8.1 Prepare a database of national and international experts in the areas demanded by local actors.

8.2 Procure international consulting services and undertake quality control.

8.3 Develop the Joint Response Plan in collaboration with the Localisation Driver.

8.4 Undertake fundraising at the international level.

8.5 Manage international visitors in cooperation with the Localisation Driver.

8.6 Identify the areas of complementarity between local and international actors, seeking the short-term role of international experts.

8a. Local actors can access a regularly updated database of national and international experts available to provide consulting services in areas including gender mainstreaming, protection, program and organisational management, sector-specific and thematic expertise, and monitoring and evaluation services.

8b. Local and international actors receive support for contracting, recruitment, selection, TOR development and negotiation, and quality control of the service consultants.

Output 9: Effective Communication System. All participating agencies engaged in the Rohingya humanitarian response practice an effective communication system (Rohingya, Bangla and English) equally understandable to the Rohingya refugees, government, host communities, and relevant international actors.

Activities:
9.1 Develop a tri-language based communication system as and when relevant (e.g. exclusive use of Rohingya/Burmese language in education, training and other communication with refugees).
9.2 Develop a group of certified translators/interpreters for communication with refugees.
9.3 Ensure translation of the meeting minutes into Bangla and English.

9a. Refugees receive all written information in Burmese and English, and via Rohingya language audio.
9b. All communications involving local actors related to Rohingya humanitarian assistance happen in a bilingual format, for both oral and written communications.

Output 10: Learning and Policy Support. Bangladesh shares its internal learning from localisation with core stakeholders and has access to external learning and policy dialogues at the national and international levels.

Activities:
10.1 Publish half-yearly reports highlighting lessons learned (online).
10.2 Maintain contacts with agencies in other jurisdictions having the same agenda and exchange information.
10.3 Support networks, alliances, and coalition activities of NGOs participating in localisation in organising seminars and workshops related to localisation and Rohingya response.
10.4 Participate in regional and international policy dialogue on localisation.
10.5 Undertake studies on localisation practice.

10a. All stakeholders receive 'lessons learnt' reports compiled from localisation practices in Cox's Bazar half-yearly.
10b. All stakeholders receive consolidated 'lessons learnt' reports from localisation practices and other jurisdictions.
10c. National and international policymakers receive demand-driven analytical support on localisation initiatives in CB.

Output 11: Establishment of a Localisation Driver. A Localisation Driver is based in Cox's Bazar and accountable to government and donors with suitable organisational set-up, terms of reference, policies and resources and available to facilitate the localisation process among all stakeholders.

Activities:
11.1 Select a suitable third-party agency as the Localisation Driver (LD) which meets a set of skills requirements.
11.2 Provide a term of reference to facilitate the implementation of all outputs.
11.3 Equip the office of the LD with human resources, materials, equipment and policies.
11.4 Develop standardised tools and templates for a) calls for proposals (concept note, detailed proposal, b) reporting formats, and c) monitoring and evaluation frameworks, in consultation with international actors.
11.5 Develop and upload standard policies (HR, finance, administration, procurement, gender, internal control, conflict of interest) for effective organisation management in website.
11.6 Procure local consultancies.
11.7 Support international actors in the procurement of international consultancies.
11.8 Develop a code of conduct for local actors (e.g. recruitment); disseminate and follow up.

11a. Government and donors agree to engage an LD with the coordination and facilitation of localisation efforts in CB.
11b. All relevant stakeholders receive the TOR and list of services to be delivered by the LD.
11c. The representatives of the relevant stakeholders are able to list the roles and responsibilities of localisation actors, and understand it as a change management process.
11d. Local and international actors start to receive services from the LD office.

Management of Pooled Funds

	Option 1: ISCG	Option 2: A local agency to manage pooled funds
1. Management capacity	Available	Available
2. Accessibility to donors	Difficult due to language barriers	Easy for NGOs to respond to calls
3. Accessibility to the field for assessment	Difficult for donor representatives	Easy, because the evaluators are Bangladeshi nationals
4. Information sharing and support to NGOs (programme management, financial accountability, management accountability, humanitarian response)	Need to hire experts (may be resource-intensive)	Possesses in-house technical capacity for programme management, financial accountability, management accountability. Need more exposure to the management of humanitarian responses
5. Compliance of donor policy (use of fund)	High (e.g. refugee rights, value for money, gender)	High compliance possible
6. Acceptability of NGOs	Less acceptable due to language barriers	More acceptable due to the missing language barriers

Potential structures for the proposed Localisation Driver: 3 options

		Option 1	Option 2	Option 3
1.	Initiative	Secretariat	Project	Project
2.	Attachment	ISCG	RRRC	Cabinet Division/ERD
3.	Policy leadership (Project Director)	Hired	Secretary	Secretary
4.	Technical Leadership (Project Manager)	Hired	Hired	Hired
5.	Supervision	Steering Committee	Steering Committee	Steering Committee
6.	Composition of the Steering Committee	ISCG, RRRC, donors, and NGO representatives	UN, donors, RRRC, relevant GO agencies, NGOs	Cabinet Division/ERD, RRRC, other relevant GO agencies, UN agencies, donor agencies
7.	Function	Facilitation of the implementation of the **Localisation Roadmap**	Facilitation of the implementation of the **Localisation Roadmap**	Facilitation of the implementation of the **Localisation Roadmap**
8.	Base	Cox's Bazar	Cox's Bazar	Dhaka and Cox's Bazar
9.	Advantages	• Rohingya response-based. • Easy access to international experts/representatives. • Coordination with the actors easy.	• Country-driven • Localisation is purely Rohingya response-based • RRRC is a relevant GO agency. • Coordination with actors is straightforward	• Country-driven • Getting policy decision from the Government is not lengthy. • Cooperation of all GO/UN/donor agencies at the national and district level expected. • Transparency of the relationship among stakeholders • Potential spill-over effects on the mainland possible.
10.	Disadvantages	• Donor-driven • Cooperation from all GO agencies may not occur • Seeking policy decisions from government may be lengthy	• Seeking policy decisions from government may be lengthy • Cooperation from all GO agencies may not occur	• Two offices (Dhaka and Cox's Bazar) will need resources • Coordination with the actors in the field difficult if the Project Director is Dhaka-based

Introduction

Since 2017, Bangladesh has been hosting over a million Rohingya refugees as a result of extreme violence in Rakhine State, Myanmar that drove vast numbers of people across the border into Cox's Bazar, Bangladesh. The Government of Bangladesh welcomed the Rohingya refugees with generosity and open borders, but the speed and scale of the influx was nonetheless a challenge. Hundreds of actors have been involved in the humanitarian response that has ensued, including the Government of Bangladesh, host communities, multilateral and bilateral development partners, the United Nations, international, national, and local NGOs, and private sector organisations.

As the crisis becomes protracted, there is recognition that a more robust strategy is needed to ensure greater localisation of the humanitarian response. The *Localisation Roadmap* prepared by Centre for Peace and Justice (CPJ), Brac University, outlines an initial three-year implementation process for localisation actors. This report analyses findings from the multi-stakeholder consultation process undertaken by CPJ and provides a narrative explanation of each output of the roadmap.

Context

The forced migration of the Rohingya generated widespread international criticism against the political and military leadership of Myanmar. Although refugees are inclined to return to their homeland and Bangladesh has undertaken comprehensive bilateral and international diplomatic efforts for repatriation, the Government of Myanmar has not created a congenial environment for dignified returns to proceed. Therefore, Rohingya repatriation appears unrealistic in the short term, necessitating a sustained flow of humanitarian intervention to maintain refugees' wellbeing through livelihoods, food, shelter, health, nutrition, WASH, education, and protection.

Rohingya refugees now comprise over three-quarters of the total population in the Teknaf and Ukhia upazilas, where host communities who served as the first responders to the influx now fear the depletion of land and forest resources and sense rising social tensions. Due to the burden they shoulder, some locals even demand the immediate repatriation of refugees, fearing further negative implications. Meanwhile, the refugees suffer from insecurity and deprivation due to missed livelihood, education and health opportunities and fear that a generation could be lost. They want to return to their homeland, but with dignity, rights and security. Amongst responders, there is agreement that the situation needs to be managed in a way that upholds the dignity of refugees without harming the interests of host communities. Limited humanitarian resources must therefore be utilised in the most efficient and effective manner. In sum, the response should be inclusive of both needs-based and rights-based approaches.

Localisation overview

Over the past 15 years, a global conversation about aid reform has taken place in recognition of the fact that global crises are mounting and funding commitments being stretched beyond existing limits.[1] The Grand Bargain, a global agreement amongst aid agencies ratified in 2016 at the World Humanitarian Summit in Istanbul, envisions localisation of aid as a way to improve efficacy and efficiency, as well as overcome entrenched power imbalances between donor and recipient countries. The Grand Bargain and other global guiding documents lay out a multifaceted rationale for localisation including the following:

1. **Bolstering national leadership on crisis management:** If navigated with ongoing buy-in from all relevant stakeholders, localisation stands to enhance national capacity to address crises and emergencies. Localisation is thus a strategic investment in national capacity. Localisation proponents recognise that when a crisis or emergency occurs, it is primarily the state's responsibility to manage. The government's strategy may include inviting support from international and/or non-governmental counterparts.

2. **Honouring local responsiveness:** Local organizations and community members are often the first responders in humanitarian assistance, yet donors come to dominate decision-making. The assistance of local NGOs is still relied upon, but local actors tend to work under difficult conditions as sub-contracted implementers. As a matter of principle, localisation guides donors and other international actors to build more meaningful partnerships with local responders in ways that transform status quo hierarchies.

3. **Maximising efficiency:** In anticipation of declining availability of aid resources, localisation is needed in order to improve cost-effectiveness. For example, greater uptake of cash and electronic transfer-based interventions

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[1] For a comprehensive overview of key frameworks, analysis and literature on the worldwide call for localisation, as well as detailed recommendations made by the Grand Bargain 2018 Bangladesh Mission Report, refer to the 25-page desk review report prepared to guide the preliminary formulation of this study and placed in annex 1 of this report.

can be designed in ways that support local vendors and markets, and which correspond to refugees' priorities and needs for greater agency and self-reliance.

4. **Shared responsibility:** Localisation presents an opportunity for government, donors, international NGOs and UN agencies to step back and focus on providing guidance to national and local responders in ways that systematically improve humanitarian outcomes. Localisation does not mean the withdrawal of internationals but rather complementarity and partnership-based models.

5. **Drawing from local expertise to improve efficacy:** Government and national/local NGOs possess comparative advantages over international actors in many areas due to their technical competencies in the development sector, as well as their contextual understanding of local dynamics, language and culture. Therefore, localisation will result in the development of more relevant and appropriate activities.

6. **Improving value for money:** Donor-dominated humanitarian assistance often results in high transactional costs and extensive sub-contracting, creating additional resource flows and spill-over effects as a significant share of resources are lost to overheads. In contrast, localisation generates more value for money.

Various precautions have also been identified, indicating the need for careful localisation planning. Mistrust often arises between local and international actors, which must be overcome in order for collaboration to be successful. International actors may believe that local actors need more time to acquire the organisational and technical skills needed to manage an increased inflow of resources and maintain compliance with accountability and reporting systems.

International actors bring specialised expertise honed by years of working on similar initiatives elsewhere. Government and NGOs may not possess these skills as they undertake refugee crisis response for the first time. Localisation will fail if accountability is not ensured. Smaller and local organisations have fewer resources with which to develop the complex compliance measures required by donors. In comparison to international agencies, local NGOs may lack the voice needed to engage with authorities. Finally, fundraising requires the ability to generate high-quality appeals supported by data and analysis; especially in the early stages of a response, international INGOs often source start-up funds and a portion of overheads from their own endowments. Local NGOs often lack access to such capital.

Overview of the research
A Localisation Task Force (LTF) was formed under the leadership of IFRC and UNDP. It is comprised of donors, UN agencies, international NGOs, and Bangladeshi NGOs. The LTF commissioned CPJ to lead a desk review, conduct a multi-stakeholder consultative process, and draft an initial three-year roadmap. The purpose of the assignment was to adapt relevant global frameworks to strengthen localisation in the Cox's Bazar context.

The *Localisation Roadmap* developed by CPJ considered outcomes from the consultative process as well as previous discussions about localisation of the Rohingya humanitarian response in Bangladesh, in particular discussions and decisions reached by the Localisation Task Force (LTF) of the Strategic Executive Group (SEG), the 2018 recommendations and roadmap from the Grand Bargain Workstream Demonstrator Country Field Mission, outcomes and recommendations of the Cox's Bazar CSO & NGO Forum (CCNF) consultations with UN, NGOs and Government of Bangladesh, and previous Cox's Bazar-level discussions facilitated by the Inter Sector Coordination Group (ISCG).

About the roadmap
The roadmap described in this report is influenced by existing ideas about localisation principles, but moreover has been built to prioritise suggestions raised by the greatest number of stakeholder participants relevant to the local context in Cox's Bazar. The *Localisation Roadmap* consists of 11 outputs to be achieved through an initial three-year localisation strategy, including phasing, impacts, outcomes, outputs and activities for each sub-section along with rationale and key performance indicators for each component. It also provides a timeline for each activity along with milestones and responsibilities. Finally, the roadmap embraces a results-based monitoring approach to track progress, review core learning, evaluate and adapt as needed.

The *Localisation Roadmap* adapts global localisation principles to the particular context of Cox's Bazar according to the following four features:

1. Indicating the **roles** that each constituency must play in successfully localising humanitarian operations in Cox's Bazar;
2. Identifying **immediate steps** that can be taken in the short term (0-3 months);
3. Articulating a **strategic approach** toward achieving longer-term steps (6 months to 3 years); and,
4. Acknowledging the **specific obstacles** impeding more substantial progress on localisation.

The CPJ research team was entrusted to facilitate inter-stakeholder discussions within the LTF as well as from other relevant stakeholders including government, refugees, host communities, local civil society, private sector representatives, UN agencies, and local, national, and international NGOs about a pragmatic localisation strategy. These included representatives from relevant agencies and stakeholders working with the Rohingya and host communities in Cox's Bazar as well as policymakers and higher-level managers of development agencies and donors in Dhaka.

The CPJ research team considered four distinct but interrelated tasks in order to formulate the roadmap. The first task was desk research to review existing documents and relevant literature, map actors, and identify the general scope for the roadmap as described below.

Objective and scope of desk research
1. Review the background analysis that already exists on localisation in Cox's Bazar;
2. Map relevant stakeholders, in close consultation with the LTF's co-chairs, relevant to the localisation discussion in Cox's Bazar and Dhaka, whose inputs will be necessary for the production of a localisation roadmap;
3. In discussion with LTF, identify the level and aspects of localisation since its evolution in 2017. These will serve as baseline data for the localisation roadmap.

The second task was to conduct consultations on localisation with local, national and international stakeholder groups to understand their perspectives on constraints and opportunities. The third task was to draft the *Localisation Roadmap* and this final report, taking into account the various field findings, the Grand Bargain principles, and the desk research findings. In consultation with the LTF, the project team sought the inputs and agreement of key players and delineated the contributions and responsibilities of each stakeholder over the short, medium and longer terms. The final task is to present the draft *Localisation Roadmap* and final report to the LTF for validation and recommendation to the SEG.

Methodology

Beyond the desk research, which synthesises relevant initiatives, frameworks and best practices, the methodology was mainly participatory, involving collection of primary data through a series of group consultations and one-to-one interviews with various stakeholders in order to build on previous analyses to update the stakeholder mapping of key national and local actors within the localisation landscape. During engagements, stakeholders were informed on the enabling and constraining factors to localisation, including enabling and constraining factors, and challenges at the economic, political, governance levels. The following themes were emphasised in the consultation team's discussions with stakeholders.

o **Common understanding:** Participants were provided an overview of principles for localisation in the context of Bangladesh as adapted from key global frameworks including the Charter 4 Change, Principles of Partnership, and the Grand Bargain Localisation Workstream. The research team provided a brief overview of relevant concepts in order to work toward a common working definition of localisation across stakeholders.

o **Analysis:** Impeding and enabling factors to localisation were analysed internally by CPJ after each consultation, including benefits and risks. Macro, micro and meso-level political, economic, social, technological, legal and environmental considerations were considered.

o **Cross-cutting discussion themes:** Stakeholders' views were consulted on common localisation themes and values reflected across all components of the roadmap. The themes that emerged included capacity strengthening, capacity exchange, transparency, ethics, inclusivity, protection, leadership, accountability, livelihoods and employment, health, education, infrastructure, conflict, gender, environment, flexibility of funding, risk, and equity.

The research team conducted 13 consultations with donor, humanitarian and government stakeholders, as well as four focus groups with refugee and host communities. The team also conducted 15 key informant interviews with individuals possessing relevant insight and expertise on localisation and the Cox's Bazar context (see annex 2). The draft report along with the roadmap was shared with the member of LTF and peer reviewers and the research team received detail feedback on the draft version (reviewers' feedback is provided in annex 3).

Informed consent was obtained from participants at each step of the consultative process. Given the sensitivities involved there was the potential for disagreements around localisation to impede social cohesion in the local area. Thus all activities were undertaken according to conflict sensitivity guidelines and with discretion and diplomacy. In

most cases, a briefing or presentation on localisation was first provided to ensure that participants were equipped with the information needed to offer meaningful feedback and suggestions. To protect the privacy of participants, they have not been named in this report where quoted, and other identifying details have been omitted. As one of the main goals of localisation is inclusivity and access, the methodology was designed to be inclusive of historically marginalised stakeholders. A balance of Rohingya, host community, female and youth participants was engaged and made aware of the localisation process throughout field-based activities.

General Analysis

Mapping national, local, and international stakeholders

The *Localisation Roadmap* suggests timelines for short, medium- and longer-term activities: '*who does what, when*'. Table 1 provides details on the type and levels of stakeholders consulted as part of the design of the roadmap.

Stakeholder Mapping			
Type of Stakeholder	**Level**		
	Local	**National**	**International**
Host community members	1. Community members, leaders and youth	-	-
Rohingya community members	2. Community members, leaders and youth	-	-
NGOs and development agencies	3. Local NGOs	4. National NGOs	5. UN agencies 6. International humanitarian agencies 7. International NGOs 8. Multi and bilateral donors 9. ISCG
Government and public sector stakeholders	10. RRRC, Camp Management (CiC) 11. District and Upazila Administration, Public Service Delivery Offices 12. Elected representatives of LGRs	13. Minister and Secretary of relevant Ministries, and Members of Parliament	-
Civil society	14. Lawyers, journalists, teachers and local political leaders in Cox's Bazar	15. Academics, researchers, and civil society members at Dhaka	-
Private sector/ enterprise	16. Businesspeople from different sectors in Cox's Bazar	-	-

Definition and scope of localisation

One of the principle challenges of localisation is how to define it. The roadmap adheres to a broad definition of localisation: '*Localisation occurs when an activity formerly performed by an international actor with a certain skill set is taken over by a local actor having a similar skill set*'. The local actor may be based anywhere in Bangladesh. Specifically, local actors may include government, national NGOs (NNGOs), district-based local NGOs (LNGOs), civil society organizations (CSOs), community-based organizations (CBOs), self-help groups, or even individuals. Donors, UN agencies, INGOs and international charities such as the Red Cross fall under the category of international actors.

This definition presumes that there will always be activities that cannot or should not be localised, such as fundraising. Similarly, there will always be activities, which cannot or should not be externalised for external managements, such as refugee burial rites. In other words, localisation will never be 100% complete. Likewise, one can argue that a certain activity is better performed by a government agency, one by an NNGO with relevant expertise, and another by an LNGO. These distinctions vary by sector. Activities fall under localisation scope have been explored in a preliminary manner by CPJ and require ongoing elucidation. The scope of localisation depends on its existing state. The assumption is that some degree of localisation is already a reality, yet greater localisation is possible. Over time local actors will

take on various roles throughout the program cycle: identification of early signals, needs assessment, program design, implementation, monitoring, evaluation and overall leadership as illustrated in figure 1.

	Scope and Trend of Localisation						
	Scope	**Now**			**Future**		
7	Overall leadership (decision-making and control)				green	green	
6	Evaluation using qualitative and quantitative skills				green		
5	Monitoring using research methods and IT	green			green	green	green
4	Implementation	red	red	red	green	green	
3	Design using tools and frameworks				green	green	
2	Needs assessment using research methods				green	green	
1	Identification of early signals of the need for humanitarian assistance				green	green	green
*Red colour indicates involvement of locals at a considerable scale.							

Figure 1: Scope of localisation

Prioritisation of Cox's Bazar-based organisations as local actors

The roadmap requires that the suitability of Cox's Bazar-based organisations as well as job candidates should be assessed and always prioritised when they demonstrate the required capacity to undertake a certain initiative (figure 2). A national organisation may be selected over a local one only if a Cox's Bazar-based competitor does not demonstrate the required skill set. Any barriers to due diligence for LNGOs should be overcome to ensure that they are able to demonstrate their capacities to the same extent as NNGOs.

Should an NNGO be selected, strong initiatives should be underway from the outset to transfer responsibility to an LNGO in the longer term. Partnerships between national and Cox's Bazar-based NGOs sharing responsibility for a given activity may also be explored. Localisation is understood as not merely a one-time transfer of responsibility and resources directly to a local actor, but rather as an ongoing transference process based on organisational standing and technical capability.
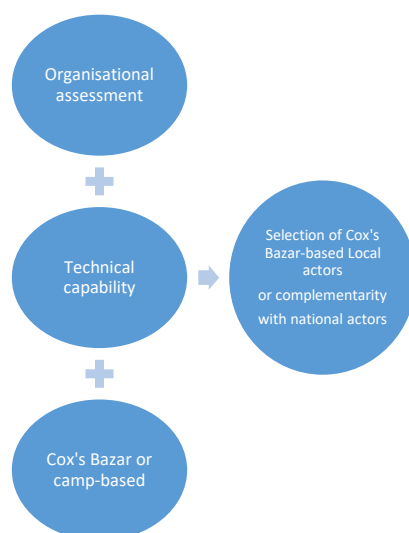
Figure 2: Localisation assessment and decision-making

In some cases, Rohingya community groups or individuals (referred to throughout this report and the roadmap as '*self-help groups*') are best suited to perform an activity. In these instances, they will be treated as a *quasi* Cox's Bazar-based informal entity, even though they are nationals of another country. The participation of the affected population is specifically facilitated in this manner. The term '*government*' is used to include all government line agencies with or without representation in Cox's Bazar District, as well as Cox's Bazar District and related Upazila administrative bodies.

CUN has international mandates.

Analysis of the institutional landscape

Rohingya and host communities are surrounded by three levels of institutions influencing their lives. Dynamics occurring between actors at each level have bearing on the response and the extent to which the localisation process can be successfully navigated (figure 3). The camp-level institutional landscape is composed of institutions which play a direct role in the response. Camp-level governance includes the RRRC, police, army, other security actors, local administrators, and government line agencies. These work alongside NGOs, the private sector, CSOs, CBOs, self-help groups, and INGOs and UN agencies with direct functions inside the camps. Informal groups such as media and religious leaders are also active.

Although these organisations ostensibly all work toward supporting the same target beneficiary population, their views and approaches do not always align. For example, the Government of Bangladesh represents the interests of its nationals living around the camps and is concerned about the stress on the physical infrastructure. Their preference is to initiate repatriation as soon as possible. INGOs and UN agencies are believed to represent the interest of the refugees, as they are formally driven by humanitarian principles that override national political interests in repatriation.

Within the non-governmental camp-level landscape, INGOs and UN agencies doubt that LNGOs can be objective in the delivery of services without monitoring and control. In contrast, LNGOs believe that given their knowledge of the local culture, language and locally applicable skills, they can easily substitute the roles currently fulfilled by INGOs and UN agencies in the camps through a localisation process. Therefore, they advocate for a more direct role and access to greater resources. The INGOs and UN agencies appreciate the demand of the host communities to have access to compensatory development services, but doubt that the government agencies and the NGOs left alone would perform in a way that utilises resources efficiently and effectively in the best interest of refugees and host communities. They particularly attribute this to capacity constraints, knowledge and skill gaps, and insufficient accountability systems. They fear that the mere transfer of resources and responsibility may not succeed unless the transference process is accompanied with extensive capacity exchange and enhancement. These conflicting views and perspectives lead to tensions and conflicts amongst stakeholders. The roadmap must address all opposing views in order to derive a shared strategy.

National-level institutional landscape

The national level of stakeholders includes policy-level government agencies, donors represented by the embassies, and country offices of UN agencies and INGOs. Similar to the camp level, the political priorities of government deviate from the humanitarian priorities of other entities. The government stresses the need for near-term repatriation and seeks increased and effective support of the embassies and UN agencies in this regard, yet these actors seem likely to support it only if Rohingyas' rights are restored in Myanmar. The Government of Bangladesh has recently expressed its expectations about more stringent initiatives from embassies and UN agencies to pressure Myanmar, fearing that if repatriation is not soon initiated, the Rohingya issue could become the source of even more severe instability and conflict. The roadmap considers these deliberations as external but has taken them into account throughout the drafting process.

International institutional landscape

International actors operating outside Bangladesh also bear influence over the situation. These include the UN and its member states (pro-Myanmar, anti-Myanmar, and neutral), international justice and accountability institutions, and Myanmar itself. In spite of intensive diplomatic efforts by Bangladesh at bilateral, regional and multilateral levels, it has so far failed to move Myanmar to allow the return of its nationals in the ways advocated for by UN agencies. Humanitarian support for refugees was forthcoming from the international community, but a united initiative to pressure Myanmar to create suitable conditions for repatriation has been absent. The oppositional stance of influential countries including China and Russia has enabled Myanmar's refusal to change. Again, these institutional factors are outside the purview of the roadmap. However, they are reflected throughout the strategy as donor funding and international support for the response remains contingent on these geopolitical realities.
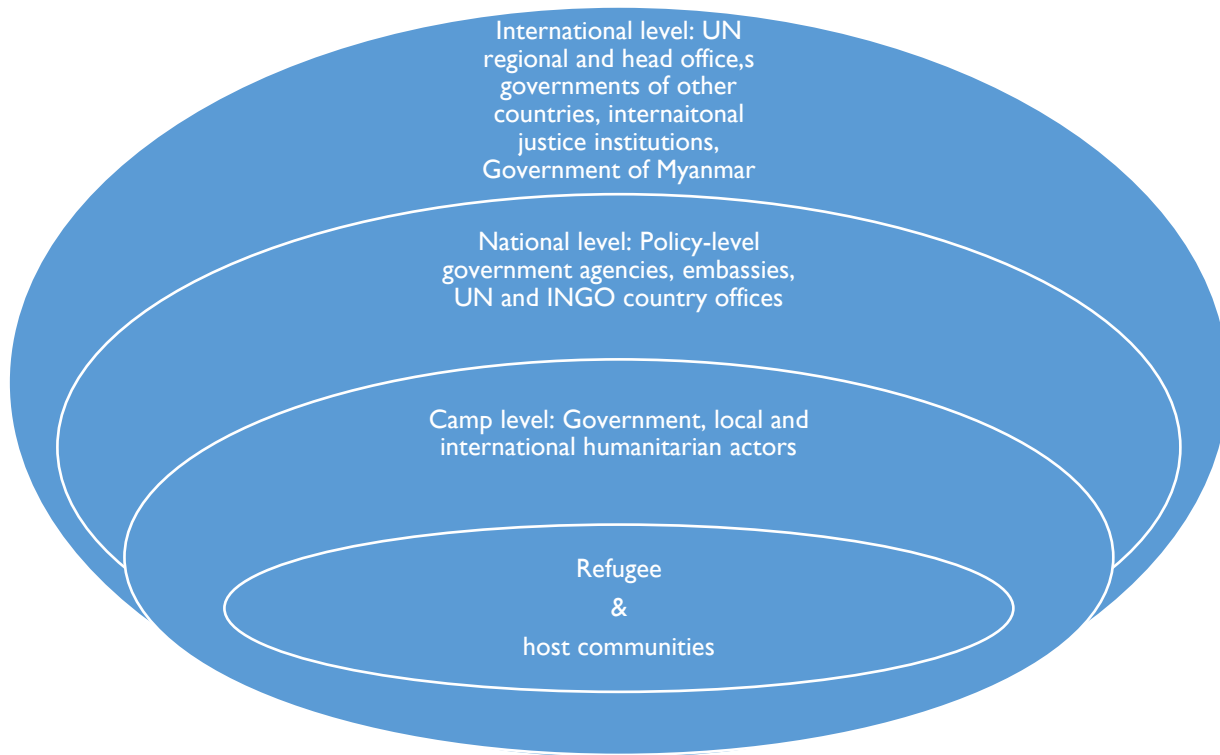
Figure 3: Spheres of influence

Additional challenges and barriers to localisation

A web of social, physical, legal and environmental factors overlaid on this institutional ecosystem present further considerations and complexities for the localisation process.

Social factors: Tensions have grown incrementally between the Rohingya and host communities. Social cohesion challenges will influence Rohingyas' experiences and perceptions of local responders and must be addressed in parallel to the localisation process.

Physical factors: Physical infrastructures have been burdened as a result of the humanitarian response, aggravating social tensions and increasing grievances amongst host communities. The barbed wire fencing recently under construction is a response to local demands for Rohingya to be entirely confined to the camps to reduce pressure on the local area.

Legal factors: There is a lack of clarity on how the rule of law is and should be applied in cases where conflict, violence and crimes occur inside and outside the camps. When conflicts need to be resolved or crimes persecuted, the absence of a sound legal system to handle cases leads to undesirable outcomes and fuels tension between both communities, government and security actors. Sustainable conflict resolution mechanisms will support the success of the localisation process.

Environmental factors: Host communities' access to forest and fishery resources, a crucial source of livelihoods, is diminishing; if aid flows declining this will create more incentive for Rohingya to consume environmental resources and seek local labour and agrarian livelihood opportunities.

Findings in Detail

PART I: General Findings

The following section establishes and justifies the specific *Localisation Roadmap* and present the key consultation findings relevant to each component.

Overview

1. Capacity exchange and professional development
2. Formation and development of voluntary Rohingya self-help groups
3. Cost-effective and innovative funding tools and mechanisms
4. Effective camp management
5. Development services
6. Social cohesion
7. Accountability
8. Specialised knowledge, skills and services
9. Effective communication systems
10. Learning and policy support
11. Establishment of a Localisation Driver

Three-year strategy for the phasing of localisation

The *Localisation Roadmap* envisages the achievement of two key impacts of localisation in the Cox's Bazar district. The two main impacts are the improved quality of life for Rohingya refugees and improved livelihoods for host communities. This roadmap provides a three-year strategy for uptake by all relevant stakeholders, including an inception phase of six months and an implementation phase of 2.5 years, comprised of seven 6-month sub-phases and understood here as a change management process (figure 4).

Inception	Implementation				
6 months	6 months	6 months	6 months	6 months	6 months

Figure 4: Localisation as a change management process

Inception Phase

The inception phase requires that stakeholders first 'unlearn' certain existing practices of 'internationalised' implementation while learning new principles and developing workplans for localisation and preparing for change. This phase will be characterised by creating a common understanding amongst actors about the concept of localisation, and the specific role of each stakeholder in the process. This will also include creating support for addressing any concerns from opponents. The process is expected to be facilitated by a Localisation Driver (LD), which will undertake preparations including gathering baseline data, setting targets and developing an action plan with the involvement of all stakeholders. All stakeholders will also be guided to develop individual action plans in order to achieve the roadmap outlined in the following sections.

Implementation Phase

The implementation phase materialises localisation in a measurable manner. Guided by the action plan, the LD will follow up on the implementation process, document progress in view of the outcomes and impacts, discuss possible deviations, and identify corrective measures in discussion with stakeholders. The LD will also address obstacles and barriers, analyse them and develop mitigation measures in consultation with respective stakeholders.

Impacts

Humanitarian assistance through localisation is expected to contribute to the improved wellbeing of both Rohingya refugee and host communities, as expressed by the following impact statements and KPIs:

1. Rohingya refugees live safely, free from suffering, and with dignity.
2. Host community residents experience a sustainable livelihood.

Key Performance Indicators (KPIs)						
	Subject	Baseline	Target				Means of Verification
			6 months	Year 1	Year 2	Year 3	
1a	Morbidity rate is not higher than the local average	X%					
1b	Degree of satisfaction of the refugees with the services received	X%	20%	25%	30%	35%	

	Subject	Baseline	6 months	Year 1	Year 2	Year 3	
1c	Number of conflicts resolved is increased	X% within X% outside	20% 20%	50% 50%	70% 70%	70% 70%	
1d	Number of cases of violence against women and children is reduced.	# women # children	-20% -20%	-50% -50%	-70% -70%	-70% -70%	
2a	Household income in affected communities has increased at par with the national average	X BDT/month					
2b	The forest ratio is stable	X %	same	same	same	same	
2c	Host community residents express acceptance of refugees	X%	20%	30%	40%	50%	

Outcomes

1. *Impact 1:* Local actors deliver needs-based humanitarian assistance to Rohingya refugees in a concerted manner, each working in their areas of sectoral expertise.
2. *Impact 2:* Vulnerable host community members receive supplementary livelihood services from local actors who address their loss of access to economic, social, physical, and natural capital due to the refugee influx.
3. *Value for money:* The delivery of humanitarian assistance for Rohingya refugees and development assistance for host communities is efficient and effective.

Key Performance Indicators							
	Subject	Baseline	Target				Means of verification
			6 months	Year 1	Year 2	Year 3	
1a	Share of total humanitarian assistance budget spent through local actors increases	X%					
1b	Share of total budget spent on actions undertaken by Rohingya self-help groups increases	X%					
1c	Share of total budget spent on protection and gender activities is maintained	X%					
2a	Share of total budget spent for host communities	X%					
2b	Share of employment of host communities reaches 50%	X%	50%	50%	50%	50%	Longitudinal survey
2c	Budget used for local procurement of goods produced by Cox's Bazar-based farmers and traders increases	X%	50%	60%	70%	70%	Longitudinal comparison
3	Unit cost of delivery for a set of defined quality standards for various services reduces	X USD per refugee for aid per month	10%	20%	25%	25%	Inter-temporal cost comparison

Roadmap Output 1: Capacity exchange and professional development

All actors build enhanced capacities in areas of programme management, institution building, sectoral technical expertise in humanitarian assistance, and protection and gender issues in order to serve refugees.

Activities:

1.1 Provide needs-based and demand-driven basic and advanced trainings using Bangla as medium of communication.
1.2 Provide Training of Trainers to develop a team of certified local resource personnel to address the consultancy needs of local actors, such as policies on financial management, administration, procurement, conflict of interest, human resources, and gender.
1.3 Organise workshops and refresher trainings to update knowledge and skills.
1.4 Introduce an online self-learning portal for local actors for self-assessment and continuous learning.

Overview

Ongoing learning opportunities should be made available for all organisations and staff to build new competencies and undertake professional development. In the case of local actors, donors may offer workshops to inform them on financial and management systems, monitoring protocols, and other technical competencies required for funding eligibility. Other workshops could be held to sensitize staff on refugee rights frameworks, global humanitarian principles and trauma-sensitive community engagement. Local and national actors could offer trainings for international actors to develop better contextual awareness and cultural sensitivity. Coming together in a learning setting will help build trust amongst stakeholders. The provision of these training services at the response-wide level will also help ensure that smaller organisations are not impeded by staff turnover.

Capacity exchange: Before or during localisation of funds?

Professional development is a process of lifelong learning that large, international organisations are often better resourced to provide to their employees in comparison to small, local organisations. By making training opportunities more widely available, all actors and staff will benefit. This will contribute to organisational as well as individual professional development

Nearly all participants agreed that international agencies should invest to enhance the capacities of their local counterparts and partners. LNGOs may lack prior exposure to donor requirements, whereas INGOs may lack familiarity with local context. Thus capacities must be exchanged on an ongoing basis. Many participants pointed out that the capacity exchange process need not be '*complete*' prior to the creation of more funding opportunities for LNGOs. This is because capacities can be only partially built via trainings. Mastering new skills requires real-time application.

In the words of a localisation advocate, '*The donors rarely prefer to work with small LNGOs due to lack of confidence, as the LNGOs do not have a long track record or rich technical capacities in some aspects. This deters donors from contracting LNGOs.*' A mutual process of training and capacity exchange is one way for trust and confidence to be built between donors and potential grantees.

One civil servant called for investment in training and capacity exchange as a necessary precursor to localisation: '*We need to have a separate fund for building the capacity of local actors and local staff. If a project is approved, a certain portion of funds should be allocated to develop the capacity of the local staff and the local NGOs…we need to increase our dependency on NNGOs for the response. We need humanitarian and other training*.' An NNGO staff identified the need for organisational and professional development to be funded specifically. He said, '*There is no allocation for organisational or staff development. There should be funding for one senior staff deployed to build other staff's capacity, and this person's salary should be included as part of an organisational development budget*'. During the fast-paced emergency phase of the response, most organisations had limited time and resources for this, but organisational development support can be included in medium and long-term planning.

Localisation proponents advocated for INGOs to proactively shift their positioning within the response. As one Bangladeshi representative of a pro-localisation INGO argued: '*Except for certain technical and strategic issues, INGOs should hand over the role of implementation to local actors after a certain period, alongside a continuous capacity building process. The capacity building and intervention should go together, otherwise they will not be able to learn from exercise and experience*'.

Considering comparative advantages

It was widely recognised that local organisations often possess comparative advantages and stronger capacities in areas where international actors are weaker, such as knowledge of local context, culture and language. They are seen as better positioned to achieve results on a leaner budget; thus, as one pro-localisation CSO member explained, '*Capacity building is not only needed for local organisations but also for INGOs. They have to understand the socio-cultural affairs of the community, the local language and the context*'.

Many participants acknowledged the need for LNGOs to gain more experience in certain areas. As one local CSO member described:

The [Rohingya] crisis is new, hence LNGOs are struggling to boost their level of expertise, the lack of which deters them to attempt carrying out humanitarian activities in the camps. However, LNGOs are well-informed about the needs and the demands of the context. Locals know the local and Rohingya language and culture, and maintain sound communication with people in both communities.

A local CSO member emphasised that capacity exchange is a two-way process between local and international actors:

Everyone has certain comparative advantages and it creates huge mutual learning opportunities. Now, local people need to learn certain professional skills like global standards in child protection mechanisms that follow core humanitarian principles. But also, international people have to learn the local culture, context, needs and preferences. Otherwise they cannot appropriately support the affected people. A cookie-cutter approach cannot be the solution to all contexts. Inter- and intra-communal learning is required.

How can capacities be exchanged?

NNGOs, INGOs and UN agencies were all suggested as training providers. One localisation advocate foresaw NNGOs as leading the training process for LNGOs: '*Under the localisation process, NNGOs will develop the capacity of LNGOs. The capacity building, training, and financing should go together, like on-the-job training.*'

An NNGO staff participant felt that '*capacity building can be provided by UN agencies*'. Another added that '*UN could play a role in monitoring, coordination, capacity exchanging support, reporting and evaluation*'. A central government official voiced a similar view: '*The INGOs and the UN agencies should play the role of leading trainings and capacity exchange for local actors to learn planning, implementation, monitoring and reporting*'.

Engaging the talent of national and local staff and consultants

Once assessments have been conducted, some participants suggested that a national roster of qualified experts and consultants would be a valuable resource from which local NGOs could draw from to ensure sufficient leadership. As one civil servant described:

In the earlier time, I witnessed that INGOs and UN agencies hired many well-known experts to respond to the crisis. Gradually they left the country and later, comparatively poorly skilled expatriates took over the top positions of different agencies. It is time to place more emphasis on the potential for local human resources to strengthen our capacity to face further crises. If any disease outbreak like Coronavirus occurs in the camps, our Bangladeshi people should have the capacity to handle the crisis. We have that pool of human resources; it needs to be utilised. Recently, many INGOs have been leaving the camps due to lack of funding. However, refugees are still remaining. We have Cox's Bazar and Chittagong-based nursing colleges, and the Cox's Bazar Medical College. We should gradually empower the younger generation of local talent in order to nationalise the response.

Other participants recommended that even Bangladeshi professionals living abroad could be tapped to return and provide consulting services. A local CSO member also advocated for better local and national recruitment:

For managing the response in a collective and collaborative way, and to have more effective and sustainable management: instead of hiring expatriates, recruit more national staff. They have sufficient knowledge of the locality, communication skills, and the capacity to manage humanitarian activities efficiently and effectively.

A government official agreed with this idea, but was concerned that the opportunity to galvanise local capacities had already been lost, stating:

To develop institutional capacity, the government should take help from outside organisations. But what we did was wrong: we should have put more emphasis from the beginning on using our national doctors, trainers and staff. We have already lost that control. We can create a pool of national trainers. Using foreign trainers cannot be effective. It has never been successful in any country.

Areas for capacity exchange: Ethics, technical skills and compliance

Three general areas for capacity exchange were discussed by participants. The most frequently raised was the need for LNGOs to learn and practice global humanitarian ethics and values. As one Bangladeshi director of an INGO stated, '*We found that in the area of humanitarian principles, LNGOs have a really poor understanding. Building these kinds of capacities is a multi-year engagement*'. Barriers identified include local actors' lack of familiarity with and exposure to humanitarian values, a male-dominated local culture impeding the ability to achieve standards in gender equality, and barriers to autonomy, transparency and accountability.

Participants also discussed the need for local actors to possess sector-specific technical capacities to deliver humanitarian services effectively. Third, they discussed the additional capacities needed to comply with financial and administrative requirements. These capacities can vary within the same organisation, as one UN official explained: '*[A UN agency] did assessments with some of the partners we were planning to work with, and it was clear that their technical knowledge was very strong on health, education, sanitation and food. But when it comes to management or human resource policy they have gaps in these areas*'.

Importance of public sector capacities

One ISCG sector coordinator suggested that civil servants should be included in the capacity exchange process to ensure sustainable government leadership: '*When it comes to the Cox's Bazar level, if we want to work with the government there is no technical staff available to work closely with us. If we could work with civil servants they could in turn help enhance the technical capacity of local partners. But we don't know how to engage them*'.

A government official echoed the desire for learning opportunities to be available to government as well as NGOs, stating, '*Whenever we are talking about capacity building, I think we also need to develop certain capacities, especially for government officials and camp authorities to enhance their professionalism and work efficiently*'.

Moving forward

Based on suggestions raised during consultations, the *Localisation Roadmap* proposes four capacity exchange activities as a way to overcome these hurdles and meet capacity needs, primarily through various training opportunities, as well as by harnessing local and national expertise. The initial six-month period of the roadmap will focus heavily on assessment and research in order to complement the thin baseline data currently available.

Roadmap Output 2: Community building amongst Rohingya refugees

Rohingya self-help groups (SHGs) are conversant with humanitarian principles, group management and respective areas of sectoral and technical engagement, and willing to collaborate with camp-based service providers including local actors in various areas.

Activities

2.1 Organise workshops to support Rohingya refugees, particularly youth and those with technical skills, to form self-help groups (SHGs) according to their areas of interest, such as first aid, nutrition, maternal and child health, adolescent girls, youth, food distribution, paralegalism, conflict resolution, senior and disability care, burial, repatriation, and birth registration.

2.2 Undertake a survey amongst refugees to create a human resource inventory differentiated according to various skill areas.

2.3 Provide training to SHGs on group management, group leadership, humanitarian principles and need-based specific sectoral skills including education using Myanmar syllabus and language.

2.4 Seek recognition of groups from the Government to operate in the camps as a complementing organ in the implementation of humanitarian assistance.

2.5 Introduce a smartphone-based, online self-learning portal for SHGs to access continuous learning and share experiences.

2.6 Organize a quarterly coordination meeting of the SHGs.

Overview

Localisation is effective to the extent that affected populations experience better outcomes and improved quality of life. Rohingya people have been thus far excluded from engaging in planning and decision-making in the humanitarian response. This presents a barrier to the goal of localisation, which seeks to empower and centre the voices of affected populations. The engagement of Rohingya themselves is needed not only to ensure that they experience improved outcomes as a result of localisation, but because greater self-reliance will improve the likelihood that sustainable repatriation can take place in the future. A mechanism is needed for Rohingya to participate more closely in humanitarian planning, decision-making and service delivery alongside local, national, and international actors.

As the Rohingya crisis is cross-border in nature, Bangladeshi as well as international agencies must take time to learn about and learn from the Rohingya people. The refugees themselves have the best understanding of their own circumstances, priorities, and needs. Many of the Rohingya people consulted during the research process requested greater inclusion in response planning. One way to accomplish this is through the establishment of self-help groups with a formal link to the localisation process.

Localisation and self-reliance

In most contexts where localisation has been widely implemented, local responders themselves are members of the crisis-affected population. There is limited precedent to help navigate localisation in the cross-border, cross-cultural Rohingya crisis, where local responders are Chittagonian Bangladeshis and the affected population are Myanmar nationals. In Cox's Bazar, the localisation movement has generally focused on an increased role for LNGOs, as Rohingya cannot form registered NGOs or receive donor funding.

One Bangladeshi director of an INGO pointed out the lack of precedent as a concern: '*LNGOs elsewhere, for instance in Nepal, work for victims residing in their same community. In Bangladesh, there is a huge contradiction between reality and expectations. Do we have any context analysis based on which we can analyse the elements if the Grand Bargain or others*'? A donor representative from an embassy in Dhaka expressed a similar view:

I thought localisation meant collaborative action with local, national and refugee actors aiming to serve refugees and victims in a better way. I think the definition of localisation here [in Cox's Bazar/Bangladesh] puts refugees outside the process. The refugee is not at the centre of localisation here. Localisation seeks to uphold the national interest, but the quality and value of service must be evaluated with the involvement of national and local actors. The humanitarian response in Cox's Bazar is a complex set of management issues where various misperceptions are fuelling the fire amongst host communities. Without ensuring the participation of refugees, ultimately the spirit of humanitarian action cannot be ensured.

Balancing humanitarian and political objectives

One civil servant emphasised that localisation actors should bear in mind that quick repatriation is the ultimate political objective:

Our strategies with Rohingya should always be about how to repatriate them as quickly as possible. From the government side we don't have any other prospects to consider. Localisation of the Rohingya response should take into account what is the timeframe for this. And our roadmap should help us become able to repatriate them.

The political focus on short-term solutions dissuades support for longer-term activities that strengthen Rohingya voices. However, it is difficult to envision how the Rohingya could return to Myanmar in a sustainable manner without participating closely in the repatriation process. One central government official agreed that this is necessary: '*We want to upgrade Rohingya by developing their capacity before repatriation so that they can have a sustainable future*'.

An INGO representative echoed the need to engage Rohingya in the localisation process, noting that their involvement in the current system is limited to unelected *majhis* who '*do not reflect and represent the voice of Rohingya grassroots people*'. The representative stated, '*Politics is everywhere. The majhi system is inappropriate. Accountability is not an easy task. Bring the Rohingya masses into the centre of the process*'.

A second INGO representative working in the site management sector warned of several obstacles to engaging Rohingya via SHGs: '*The local anti-Rohingya sentiment must be handled very carefully*'. A third echoed these challenges:

The Government of Bangladesh is sticking to a position not to recognize any Rohingya self-help group. The key concern of government is that these Rohingya self-help groups could be negatively mobilised further towards commit destructive activities in Bangladesh. But there are many ways to facilitate and manage self-help groups. How we manage the people in a systematic and conducive way depends on the will of Bangladesh authorities. Can we develop some strong norms and values for these groups that they will certainly abide by?

The main purpose of these Rohingya self-help groups would be to support Bangladeshi policy and to work for the betterment of the Rohingya people. This can help keep Bangladesh safe. There are some examples, like the Rohingya disaster management committee, the dispute resolution taskforce. These are doing quite well. They need training and further support.

Understanding the need for participation

Whereas authorities may fear that allowing refugee participation is a political risk, other informants saw the lack of participation as a driver of security concerns. A UN representative commented:

The police and the Army…need to understand their limitations and strengthen their weaknesses. They also need to understand refugees' needs and the significance of Rohingya participation, which could be an opportunity to mitigate further conflict escalation.

Refugees need to have a structured voice that they are allowed to express and pursue, and not just the majhis. Majhis have to be elected – now, most of them are abusing power. They are dominating and extortive. They should have space to exercise leadership within a very small group of people only. There should be representatives and council systems within the community. The focus will be far away from political participation deal with day to day affairs.

Local CSO members also recognised the need to include Rohingya voices in the process, explaining that madrassas and maktaubs are two of the largest community-based institutions, yet unsupported by NGOs. Engagement with these sites is a way to promote peace education and moderation to mitigate the risks of criminality and extremism. According to a NNGO staff member, '*If Rohingya remain uneducated, unemployed, and unskilled, then they will be harmful for regional security and stability*'.

Rohingya community's wish for inclusion

All of the Rohingya community members consulted by CPJ expressed a desire to be included in planning. One described a lack of respect and trust between refugees and NGO staff: '*The Rohingya people find that many NGO staff, especially the locally recruited ones, do not show respect and dignity towards us during ration distributions. Our people speak out to say that everyone wishes to be respected and wants to have dignity, which is fundamental to human rights*'.

Another consultation participant said, '*If you want to work in the camp, you should involve Rohingya people in the process. The NGOs should take opinions from Rohingyas and also assess the real needs of the Rohingya*'. A third raised the lack of refugee voice in decision-making:

NGOs never or seldom consult with the Rohingya people before starting a project. Many NGOs are providing education services which are not pertinent to our needs and demands. We wish to receive formal and needs-based education in English or Burmese. At first, child-friendly spaces were a praiseworthy initiative but they are only for the equivalent of Grades 1, 2 and 3. Amongst our community there is a huge demand for high school education for those who finished their primary and secondary education before the influx.

According to a fourth participant, '*There are trainings provided to us on health. These should be given by Rohingya teachers. And our majhis should be educated and knowledgeable. The current ones are not. Blindly uneducated majhis cannot lead our people.*'

Nearly all Rohingya consultation participants expressed their frustration at the lack of inclusion. According to one, '*Unfortunately, Rohingyas are at the centre of all humanitarian services except for when it comes to their participation in decision-making*'. One woman felt that localisation would be advantageous to Rohingya overall: '*The participation of Rohingya in decision-making could make implementation more efficient and effective. We need to create opportunities for future generations. For example, midwifery training for Rohingya women could solve some first aid problems in the camp. We want to do partnership-based activities with NGOs*'.

However, another Rohingya participant had observed that LNGOs were less proactive than other agencies at involving refugees in programme design, stating, '*We Rohingya are just service receivers and often neglected regarding providing our opinions. Local organisations are especially reluctant to take opinions from Rohingya. Hence, many services and goods are given that are unnecessary*'.

Other Rohingya participants spoke of their positive relationships with host community members at the grassroots level, and advised engaging them more closely.

Local support for self-reliance

Host community and local CSO informants expressed to CPJ their desire to help capacitate Rohingya SHGs as a way to introduce moderate religious views. Nearly every local stakeholder advocated for education and self-reliance for refugees. One host community member explained, '*There are different mechanisms to influence negative behaviours, such as religious education. Currently, the Rohingya understand religion in an improper way.*' A local CSO member argued, '*Instead of a spoon-feeding approach, if we can train the Rohingya people to work in small industries, mills, and handicrafts, they will be able to create their own sources of income*', thus relieving pressure on the local economy. One upazila parishad member commented, '*The Rohingya children need education…We need to follow a bottom-up approach for sustainable development. We have to work together*'.

Civil servants working close to the issue also voiced their support for livelihood and self-reliance opportunities inside the camps. One government official explained:

The localisation process will cover these gaps. If repatriation started today, with 300 people per day, it will still take 11 years at least. So the question is how to keep the Rohingya in peace? How to accommodate them? We have to think short and long-term by understanding the reality of the national and local contexts. Income-generating activities and education are a crying need. You will see the positive result after just a few days. These people simply must be kept busy with something. Otherwise, they will be involved in other things that will adversely impact society. This is the burning issue and a crying necessity for the community.

Moving forward

The *Localisation Roadmap* proposes six activities for the formation and engagement of Rohingya self-help groups as a way to enhance humanitarian outcomes, strengthen security objectives, and help equip the population for successful future repatriation. This strategy is aligned with recommendations made by government, host community, NGO, and refugee community participants alike. SHGs will be the key entry point for LNGOs to build proactive community relationships and for the impacts of localisation to be measures based on Rohingyas' own experiences of aid.

Roadmap Output 3: Cost-effective and innovative funding tools

Donors, UN agencies, and INGOs operate innovative funding mechanisms (e.g. pooled funds, direct funding, network funding) to engage suitable, capable and competitive local actors as partners. These funds address the needs of the Rohingya refugees, host communities and learning needs of the local actors and Rohingya self-help groups in a systematic manner.

Activities
3.1 Develop standardised guidelines, operational and compliance procedures for innovative funding tools (calls for proposals, assessment systems and rewards modalities) by donors, UN and INGOs.
3.2 Provide workshop for local actors (national and Cox's Bazar-based NGOs) on online bidding procedures (in Bangla or English).
3.3 Encourage local actors to enlist in a database online differentiated according to geographical focus and profile (areas of expertise, management structure, organisational development, programme management capacity, awareness about humanitarian principles, etc.) and update their profile regularly.

Overview

Pooled funds are multi-donor humanitarian financing mechanisms with harmonised proposal and reporting requirements. Pooled funds should be managed locally in Cox's Bazar to improve accessibility for LNGOs. Pooled and direct funding help reduce high transactional costs in the sub-granting model that currently prevails.

Addressing funding disparities

Differences in quality of work can often be attributed a wide pay gap, challenging the view that local actors have weaker institutional capacities. According to one participant from an INGO:

If the salary of a UN staff is 180,000 BDT per month, whereas [an LNGO] pays 20,000 per month for a similar job, here is an issue that leads to the so-called 'capacity gap'. If the LNGO had the money they could hire more efficient and qualified staff. The capacity of local organisations would automatically increase. Unless sufficient funds are invested, capacity cannot be ensured.

Similarly, other participants noted that the subcontracting model limits LNGOs to the implementation stage of the project cycle, which prevents them from developing competencies in other stages. One local CSO leader described how the lack of administrative and staffing costs available under a subcontracting model inhibits his organization's development:

We do not have core funds to provide a salary to staff. We are unable to provide a handsome salary and hence local skilled staff are frequently poached by big organisations. Constraints on the nature of projects we can work on and the short project timespan (1 to 6 months) hinders our ability to address our gaps and makes us unable to build further capacity. Donors provided us a very small portion of administrative costs, which is insufficient for our organisational development. We are losing our skilled staff and our strengths.

Managing expectations, understanding donor limitations

Several donor participants warned that LNGOs' expectations should be carefully managed, stating that localisation would inevitably be a gradual and cautious process. One donor said that, for his embassy, a shift to direct funding of LNGOs is *'just not going to happen'* due to limited human resources and the high transactional costs it would entail. Another donor representative viewed the trust gap as a major limiting factor:

The Grand Bargain Workstream on localisation says donors will give more support to local actors. It doesn't say funds will be transferred away from international to local actors. I don't think at the moment there is any donor here who will provide millions of dollars to LNGOs. There is some misunderstanding…for us donors, it's not important who gets the money but rather what the beneficiaries are getting from it.

If we saw that local actors were working in the best interests of the Rohingya and affected host community populations - if we could understand that they were really working for them, that they were working with transparency and respect for the ethical aspects of working in a humanitarian context - then it would be easier for us donors to believe that localisation can happen.

Donor representatives explained that the funds they grant to NGOs come out of national aid budgets in their home countries, and they do not have the power to alter the financial management protocols required of grantees. These systems are often costly and sophisticated to maintain, creating a bias toward large INGOs. LNGOs may lack awareness about these regulatory processes. They need more access to information about compliance requirements and the reasons they are in place.

Another donor cast doubt on the potential for localisation in Cox's Bazar altogether, stating that, '*Localisation is not applicable for the Rohingya response. Rohingyas are not local or national. They are a foreign community and they want to go back to their country. We want to see Rohingya self-help groups and civil society have a greater role, although there are some legal barriers*'.

Pooled funding available to local actors

Pooled funding solutions and close collaboration is a way to engage more LNGOs. As one donor representative explained, '*There are no pooled funding systems in Cox's Bazar; therefore, many things are duplicated. In the beginning, we could not rely on LNGOs due to their lack of registration and weaknesses in terms of capacity. So we have had to go for a collaborative process. We need to see how they will develop financial management systems and humanitarian programming*'.

Pooled funding was seen by various stakeholders as a solution to many of the barriers to funding for LNGOs. A foreign INGO representative thought government should require pooled funding mechanisms: '*If the government spoke up for localisation and pressured agencies, you would see everyone create a pooled fund and localisation would take place automatically*'. A UN official expressed high hopes for pooled funds:

There is scarce transparency and accountability, and there is wastage of money amongst donors. Pooled funds are the most effective way to ensure transparency, effectiveness and reduction of duplication. If you ensured pooled funding tools, the rest of localisation would be automatically ensured. All NGOs would be compelled to follow humanitarian principles. They would ensure transference, they would be accountable to authorities and to the masses, and they would enhance their capacity in order to get access to the funds. Pooled funding is a kind of democratic tool: everyone is using the same structure. It would be seen as more impartial, acceptable and equitable to all stakeholders.

Moving forward

The *Localisation Roadmap* proposes the establishment of a pooled fund and the development of standardised guidelines, operational and compliance procedures for innovative funding tools. Donors should ensure that clear information on bidding, proposal and reporting requirements is provided to interested LNGOs through workshops and open communication. A database of local and national NGOs who meet minimum requirements can be developed. A pooled funding scheme that encourages or requires local-international partnerships can be piloted and incrementally expanded as a way to build experience and trust amongst an intial cohort of grantees.

		Option 1: ISCG	Option 2: A local agency to manage pooled funds
1.	Management capacity	Available	Available
2.	Accessibility to donors	Difficult due to language barriers	Easy for NGOs to respond to calls
3.	Accessibility to the field for assessment	Difficult for donor representatives	Easy, because the evaluators are Bangladeshi nationals
4.	Information sharing and support to NGOs (programme management, financial accountability, management accountability, humanitarian response)	Need to hire experts (may be resource-intensive)	Possesses in-house technical capacity for programme management, financial accountability, management accountability Need more exposure to the management of humanitarian responses
5.	Compliance of donor policy (use of fund)	High (e.g. refugee rights, value for money, gender)	High compliance possible
6.	Acceptability of NGOs	Less acceptable due to language barriers	More acceptable due to the missing language barriers

Roadmap Output 4: Effective camp management

All refugee camps are managed following humanitarian principles, policies, division of labour and guidelines jointly developed by government and other actors including Cox's Bazar-based NGOs, CBOs, CSOs, SHGs, national NGOs, INGOs and UN agencies.

Activities

4.1 Draw a three-year rolling plan to maintain physical, social and institutional infrastructure (shelter, WASH, school, health facilities, market, graveyard, SHGs, policies, security of women/girls/children, etc.) following standard guidelines developed in consultation with local and international actors, as well as with credible representatives of Rohingya communities.

4.2 Seek the services of the localisation driver to find suitable local actors from applicants, and of international actors where necessary to maintain services at camp level.

4.3 Allow the chosen local actors to facilitate the formation of Rohingya self-help groups in various technical areas to reach refugees with various services.

4.4 Establish and maintain informal conflict resolution system (intra-Rohingya, and Rohingya-host communities) in consultation with the parties.

4.5 Communicate policies of the government in view of living in the camp and repatriation.

4.6 Prepare and disseminate a monthly camp report to the stakeholders based using a template.

4.7 Provide support to the localisation driver and international actor during the visit of international guests.

4.8 Monitor the activities of the organisations operating in the camps, in view of their action plans and share observations in weekly meetings.

4.9 Introduce tri-lingual communication system in the camps with Bangla as the base.

Overview

[handwritten: In general weak on holding GoB responsible as a key actor]

As the leading actor in the Rohingya response, government officials should be engaged in localisation alongside humanitarian actors. The support and involvement of site management personnel and camp authorities is needed for localisation actors to maintain camp access, gather community inputs, and track localisation progress at the camp level. Moreover, their engagement will help engender a camp environment conducive to collaborative action between local and international actors in partnership with affected communities.

Community engagement in the camps

Lack of camp access by INGO personnel could become an important barrier to localisation, as it would impede their ability to conduct monitoring visits. The camps themselves are the only place where refugees, host community members, local, national, and international actors all engage. The daily lives of refugees are closely impacted by camp management, and their satisfaction with services varies widely by location where different actors have responsibility. Consultation participants expressed a wide range of views on the role of site management in the localisation process, with one localisation advocate viewing the overall site management sector as '*an unnecessary wastage of money*'. The advocate explained that site management authorities should be better consolidated under government leadership:

Often site management creates an obstacle to other actors who are working, especially the LNGOs. Instead of site management, we should give more emphasis to the role of the RRRC. The RRRC is becoming just another layer for getting approvals. Most of the site management actors are INGOs who are using the lion's share of the money for themselves.

Clarifying the mandate of camp authorities

One foreign INGO representative also declared the importance of government oversight of site management: '*Site management capacity is essential for government agencies. The CiC still has no concrete terms of reference. They need to fill their own capacity gaps*'. A government official echoed the need for CiCs to be better guided through clear policy: '*So far, the CiCs do not have any certain policy on how to work. They have a scarcity of human resources and core funds. They are working using just their common sense*'.

A UN representative also commented on the current camp management challenges, stating, '*The CiC staff are very young, entirely male-dominated. Most have just finished their graduation and participated in one crash course. That is insufficient. Both the ISCG and RRRC need to develop these staffs' capacity in an effective and meaningful way*'.

Community-supported services at camp level

Localisation presumes that some services cannot and should not ever be fully externalised. A donor explained that the camps must be accessible to international partners in order to monitor their implementing partners, as well as to

oversee protection activities, which non-local agencies need to stay involved in as neutral actors who can intervene in the case of inter-communal tension between refugees and locals.

Self-help groups are needed to ensure that communities have internalised oversight of personal and community matters including birth, marriage and death registrations and religious rituals. Building a link between these groups and site management authorities helps uphold rule of law and ensures that refugees have access to positive coping mechanisms. For refugees, access to camp management actors is needed to participate, raise concerns, share feedback and engage with decisionmakers and duty bearers. According to a Rohingya participant:

Refugees' problems and growing grievances against poor camp management are not heard in a timely and proper manner. There are several complaint boxes in NGOs' offices; however, due to the lack of initiative and sincerity of CiCs, RRRC and site management organizations to enhance public relations, these problems remain unsolved.

Another Rohingya participant explained the need for better responsiveness to refugee concerns at camp level:

Rohingya people are quite aware of their needs and know the point of contact where they should go to seek support and put complaints. Many organizations have complaint boxes placed with majhis, CiCs, and site management offices. People often tell the camp majhi about their sufferings, needs, and demands. But these majhis have nothing to do except send the information to the camp's site management.

Localisation of site management

The idea of localising site management was met with different viewpoints. One participant it as '*critical*' but said, '*It should go extremely slowly because it is so decisive. This sector is already localised with a huge number of local and national staff; its ultimate goal is become fully localised*'. However, another site management INGO staff stated that, '*Localisation of site management – meaning, management by local organisations, will be challenging at this moment. I work in public health, which can be very sensitive. Local people need to know how to deal in these sensitive sectors with great care*'.

Another INGO representative commented that:

There are huge rosters of international site management experts who follow certain humanitarian principles and have strong technical capacity. Local organisations…need skills in programme design, proposal writing and administrative capacities, and strong accountability to local and superior authorities.

A UN representative added that, '*The structure of the CiC office and the underlying power dynamics are problematic in Cox's Bazar. If the CiC worked only with local and national NGOs things would be more difficult*'. Another participant noted that management and staffing issues were holding back the CiCs' leadership:

The CiCs have to establish leadership over the crisis. Some CiC officials have been transferred frequently after a very short time, like three months, even though they are supposed to stay for at least a year…The quality of work, skills and knowledge should be transferable from one person to next person. Lack of a concrete TOR for the CiC is a big gap and they also do not have clear policies, which is hindering their performance. Therefore, they also need to have certain capacities to manage camps and have the ability to coordinate all relevant actors.

An INGO representative who has worked in other refugee scenarios explained how strengthened camp management systems would be advantageous to Bangladesh's crisis management sector as a whole:

Globally, the CiC takes the leadership over a refugee crisis. I think after a couple of years, these CiCs [in Bangladesh] are going to be extraordinarily experienced and will become international civil servants representing Bangladesh in the United Nations and the humanitarian world. The humanitarian world is enlarging and the demand for crisis managers is burgeoning. But the government hardly understands the value of this role and often skips the opportunity to strengthen the CiCs.

Moving forward

The *Localisation Roadmap* envisions that empowered local responders will improve humanitarian outcomes for affected populations by working closely with them as well as international actors and government officials at the camp and host community levels. The roadmap outlines several ways for this to be achieved, including support for self-help groups linked to site management NGOs and authorities, communication and feedback mechanisms, the development of sector-specific approaches to localisation, and through improved language standards to ensure clear communication.

Roadmap Output 5: Development services to host communities

Host communities have access to preferential status for suitable employment, as suppliers of agricultural goods for refugees (local procurement), sustainable household energy systems, community assets (e.g. roads) and institutions (e.g. community clinics, schools).

Activities

5.1 Develop and introduce a common recruitment policy to engage local people in the Rohingya humanitarian response associated with capacity building and continuous education.

5.2 Introduce a farming system or crop diversification model for profitable farming using the services of the Department of Agricultural Extension.

5.3 Encourage the private sector and farmers to participate in the supply chain for products to be delivered to Rohingya refugees associated with capacity building for bidding.

5.4 Support development of host community infrastructure as prioritised by the community (e.g. roadside plantation, school development, road development, community clinic, sustainable household energy systems).

Overview

Host community members should be supported to articulate and work toward their own development priorities, to participate in the humanitarian response, and to have their grievances addressed. Cox's Bazar and the whole of Bangladesh are suffering from the ripple effects of the Rohingya crisis, the climate crisis, and pervasive economic and social vulnerabilities. Localisation has the potential to address these coexisting threats by ensuring that environmentally sustainable, localised procurement, and contextually appropriate practices are integrated across the response, which has the potential to boost rather than harm the regional economy.

From responder to victim

The host community members who participated in consultations shared grievances about serving as first responders but gradually feeling victimised by - rather than empowered to participate in - the humanitarian response. One elder remarked:

Being the first and vital responders to the crisis, we locals were gradually excluded from the current humanitarian activities, which have been taken over by INGOs and UN agencies. Alarmingly, the mindset of local people is gradually changing from compassion to hatred due to misdeeds and mismanagement by NGOs. Immovable traffic jams, price hikes, and falling wages; frequent accidents in the road, and a huge population density make local people exhausted to live our lives.

The suffering of the poor and the ultra-poor people knows no bounds and their purchasing capacity is decreasing radically. Many families lost their source of income as their mango forest, jackfruit forest, flower garden, hills and trees disappeared where Rohingya people cut the forest to build their shelters. After the influx, our grazing land also reduced remarkably, and cattle farming became impossible. The cost of farming and cultivation also increased and has fallen outside of our purchasing capacity.

The declining role of host community residents from first responders to secondary beneficiaries is a source of grievance that runs against the goals of localisation, as one LNGO leader explained:

The local host community people have been the most responsive to the Rohingya's humanitarian needs since before the influx of 2017. Local people sacrificed civic opportunities, shared their dress, food, and shelter with the fleeing masses. But more recently, locals have been excluded from having responsibility within the response. It is led by outsiders, NNGOs and INGOs who are reluctant to hire local staff. They have terminated contracts with many local staff, and NNGOs are hiring people from outside of Cox's Bazar. Most of them are their own relatives and the friends of senior bosses.

According to a civil servant, host community members have '*become a minority and victims of the crisis*'. Hence, their leaders must be more closely involved in the humanitarian response, which he felt could be addressed through localisation:

We have to ask the community leaders to tell us what sort of role they want to play in the response. Harmony is vital. The main task is how to serve the refugees' needs without forgetting the host people. You cannot manage the crisis alone - localisation covers all parties. The local community is the main guardian of security. If any occurrence happens, they will be there first.

Humanitarian funding; development needs

In an effort to accommodate the needs of the host community in the wake of the influx of refugees, the Government of Bangladesh has ordered all NGOs to spend 25 percent of total aid funds on the host community. This was observed by some as leading to lack of accountability of funds. According to an INGO representative:

Some government officials interpreted this order at their will and told people to open up aid trucks, take 25% of the supplies down the road, and give them to the host community. Nobody made sure that those items were wanted or needed by the host community. While discussions on localisation take place, these misdeeds are happening at an accelerating rate since the 25th of August 2019. Everyone has their own distinct interpretation of the rules.

Another Bangladeshi INGO representative described the situation as a result of unclear policy guidance on how to assess and meet the needs of locals. Whereas refugees rely on humanitarian aid, locals would benefit from sustainable development support and avoiding aid dependency. The representative called for more effort to distinguish the different needs of the two communities.

A humanitarian context is different from a development context. While talking about the refugee crisis we need to take a core humanitarian perspective. At the same time, a large portion of host community residents have lost their livelihood and civic opportunities. How do we differentiate or combine both affected people?…Different actors have different interests. How will Bangladesh handle such a competitive interest-seeking game?

A local upazila parishad member supported the 25% allocation rule, stating that it helps host communities overcome the financial losses many residents have sustained due to the crisis: '*The government and NGOs must ensure 25% of allocation for the host community because we lost our property, forest, bamboo forest, grazing land, and farmland. We should get the first priority, as we are affected because of refugees' arrival*'.

Others noted that while there are important differences between the communities' needs, there are also similarities in terms of a shared need for stronger shelters, better medical services, and education facilities.

Multiple approaches to engaging locals

One donor representative expressed the belief that, '*Most local host community people will be happy if the number of positions for local staff is increased by all types of NGOs. But local NGOs are thinking that localisation only takes place when the roles, responsibilities and funds are all transferred to them*'.

An LNGO leader shared a similar view: '*NNGOs are bringing all the top, middle and lower-middle staff from outside of Cox's Bazar and nepotism is the main problem with their recruitment process. Host community residents are hired for a position at a rate of 10,000 to 15,000 taka per month as a translator, volunteer or assistant. They are not included at the planning and decision-making level*'.

Participants noted many areas in which host community residents could be more intentionally engaged in meeting the needs of the response. One donor recommended '*procurement from local vendors in host communities and hiring more local staff to facilitate the localisation process*'.

Understanding the local political economy

More inquiry is needed to determine host community residents' views regarding their livelihood and employment interests. Participants also pointed to the need for better data to understand how the local political economy has been affected by the humanitarian response. One civil servant confirmed that the host community is a '*sufferer of the crisis*'. However, he noted that:

There are some opportunities too for the host community, that also needed to be identified. One million people are a big market. This camp is a big marketplace to sell your vegetables, fish, rice and daily commodities. These vegetables have to be produced by the local people. So the response is also creating employment opportunities for the host community. If we mobilise the host community people and create more such opportunities, then the current level of hostility will be reduced.

A Bangladeshi representative of an INGO framed the following research questions: '*How are the lives of refugees and host community residents impacted in different ways? How can we research the pre and post-influx process to guide policy, decisions, and action*'? A UN representative speculated that money flowing into the area due to humanitarian funding likely remains, as evidenced by recent construction: '*If you visit anywhere from Ukhia to Teknaf, you will see multi-storeyed buildings going up, which also shows development and the local benefits. Maybe 70% of aid money is going there from Kutupalong*'.

Addressing policy and programming gaps

Participants from various backgrounds agreed that clearer policies and more strategic interventions are needed to address the needs of local host community residents. A local CSO member in favour of localisation stated:

The government needs to follow a looking-forward and looking-outward strategy to learn how other countries are managing this type of issue. Indonesia, Turkey, Jordan and other countries are working differently and give permission to INGOs under only a few conditions. For instance, INGOs are required to work by partnering with local NGOs, or have to spend a certain portion of funds on the host community.

Development solutions recommended by local CSO members include '*education, vocational training, workshops on income-generating activities for local youths, and services for unemployed people to contribute to their peaceful rehabilitation. The local government, national government and NGOs could take holistic action on this together*'. A host community leader suggested that localisation should include not only financial support, but also civic engagement of host communities: "*I think village-based, small humanitarian committees could be formulated together with LNGOs, the local administration, local government bodies, and local community elders to carry out humanitarian activities*'.

Other host community participants recommended that a transparent list of poor and ultra-poor host community residents be compiled with data provided by BRAC and others in order to map the impacts of the crisis on this demographic and address these families' solvency. They also described their lack of trust in local political leaders and local government agencies because of corruption and misuse of power. In contrast, religious leaders and school teachers were mentioned as trustworthy and socially respectable people who could take the leading role in the localisation process within host communities. According to one participant, '*The local people have natural accountability to the local people*'.

Moving forward

In response to the feedback gathered and shared above, the *Localisation Roadmap* advises that host community members be given preferential status over equally qualified national and international candidates in hiring processes, that local vendors be favoured to the extent possible, and that funding support be given for sustainable development objectives rather than as sporadic aid material donations. Humanitarian, private and public sectors can work together for win-win solutions in which regionally resilient economies and sustainable development outcomes are built in the long-term interest of host communities.

Roadmap Output 6: Social cohesion

Host communities, represented by local government representatives (LGRs), are included in decision-making, are sensitive about the plight of the refugees and the necessity for expected humanitarian attitude towards them, and have a conflict resolution system in place.

Activities

6.1 Organise regular ward-level community meetings with the involvement of LGRs on various aspects of the Rohingya humanitarian response to clarify the government's policy and roles arising for the communities.

6.2 Support regular meetings between the LGRs and representatives of Rohingya communities to discuss issues of mutual interest.

6.3 Establish a conflict resolution system engaging the LGRs, representatives of Rohingya communications, and camp administrator to address potential conflicts.

Overview

Despite humanitarian actors' widespread recognition of the need to build social cohesion between refugee and host communities, there remains little face-to-face interaction between the two populations. This limits opportunities for sensitisation, tolerance and sensible approaches to intercommunal coexistence. Localisation presents an opportunity for hosts and guests to develop mechanisms for resolving problems together, with the engagement and support of local government representatives.

Social cohesion: An urgent need

Many participants echoed the summary of a civil servant working in the camps who stated, '*There is a growing conflict between the communities. Hence social cohesion is urgent. The refugees are here for a temporary period but before leaving, we need to ensure peaceful coexistence by ensuring health, security, and education*'. One UN representative explained the deterioration of relations: '*In the beginning, Rohingya were widely accepted but now they are disliked by many locals. The agitation is continuously increasing*'.

There are divergent views on social cohesion. Various local CSO members and local government representatives described intercommunal tensions as the product of misguided interventions by international actors. They saw locals' grievances as a function of response mismanagement and local people's animosity as directed toward duty bearers rather than toward refugees. As one upazila parishad member stated:

The Rohingya people are not a problem for us except when it comes to the controversial acts of INGOs and UN agencies. Expatriates and INGOs seldom acknowledge the locals' contributions to the Rohingya. They often belittle locals' social cohesion and the ongoing peaceful coexistence. They have gradually excluded locals from engagement in humanitarian response activities.

Social tension as a barrier to localisation

Thus, social tensions exist not only between Rohingya and host communities, but between local and international actors. A UN official and other participants observed that anti-Rohingya and anti-expatriate propaganda has diminished trust amongst donors and decreased their willingness to shift resources to local actors. A RRRC representative emphasised the need for trust-building on multiple levels:

There is a conflict of interest between the host and Rohingya community. Whenever we talk about localisation, roles and responsibilities go to the local people, NGOs and local government representatives. If LNGOs and local actors do not have respect towards the refugees, the status quo will be that a biased approach is taken toward them...If we make any Localisation Roadmap taking into consideration only the host community and not the refugees, it will not uphold greater humanitarian principles. There are some political interests and conflicts of interest that must be identified.

A central government official further explained,

The local community cannot accept the Rohingyas for several reasons. They do not know global perspectives on development and humanitarian issues, and humanitarian messaging has not been disseminated amongst the local host community clearly and appropriately...If we can share these target and objectives, the local community will be calmer. Through civic engagement and sharing of information, we can gradually reduce the gaps and diminish the tensions between the two communities.

Localisation means local dispute resolution

A CiC argued that under a localisation agenda, intercultural understanding was key to resolving problems at the local level:

The truly local people should solve their problems locally. In this response, the people of Cox's Bazar could do better to communicate with the Rohingya. Without understanding the pulse of the victim and understanding the local culture and anthropology, problems cannot be assessed and handled properly. Therefore, understanding the culture and reality of their society could help us immensely.

The UN official also noted the view that dispute resolution is integral to localisation:

The most complex and big problem in the camps is dispute resolution when there are conflicts between the refugee and host communities, or amongst refugees. The police can be involved, but they don't bring in the Army for small problems. The Army will just be there to support the police and the CiC should act as a mediator. But the problem is the policy deficiencies and the lack of legal jurisdiction. What would be the punishment for a crime?…What laws should be imposed? How do we approach imprisonment?

Inclusiveness via localisation: Youth and women's role

Volunteer programmes could be facilitated by NGOs that enable diverse refugee and host community members to play a hands-on role in peace building. Participants explained that a localisation agenda must strive for inclusiveness in order to strengthen social cohesion. A central government official noted the available pool of educated youth who understand the need for tolerance and could be engaged in the process: '*Building trust amongst actors means embracing the capacity and the knowledge of local people. There is huge potential amongst youths who finished graduation and know English, and could be involved in this process. Both the local and the national actors should respect and have mutual trust so that everyone buys in'.*

In addition to the potential for youth representation, other participants advocated for the close involvement of religious and education leaders as representatives of the local civil society who could be engaged to work for the social cohesion aspect of localisation in ways that overcome politicisation. A Bangladeshi director of an INGO urged the need for gender equity:

While we are talking about the role of grassroots organisations in localisation, we never talk about women's-led organisations. We are actually just talking about local male-headed organisations. Maybe that is not the intention, but it is the reality…If you introduce any of these male-led local organisations to the response, you have to introduce in parallel a mechanism that develops the capacity and the support of those women's-led organisations. Otherwise, this is all just political rhetoric.

A local CSO member agreed: '*Educated women, especially school teachers and female upazila parishad members, could be involved in the process. However, the working environment must be friendly to women and girls. In particular, local people are reluctant to allow unmarried girls to do jobs in the NGO sector due to the sense of insecurity of their daughters'.*

For the roadmap to achieve localisation's goal of a power shift in an intersectional manner, it must ensure that all local actors' voices are considered equally, particularly those of traditionally marginalised groups. INGOs have mechanisms and policies to ensure equitable representation in terms of human resources and programmatic approaches; LNGOs must also develop and enforced these standards in order to uphold humanitarian principles.

Shaping localisation through civic and intercommunal engagement

An INGO director saw the '*lack of engagement of community members as one of the key barriers to localisation',* and felt that all agencies '*need a policy on how to engage them'.* He shared his views on how to overcome this:

More organizations needs to have specific policies about how they want to engage the local and refugee people in their activities…The engagement of Rohingya is critical but difficult due to legal barriers. There should be a certain commitment by organisations to ask Rohingya if they want localisation and if so, how they want it to look. How would they like to help facilitate it? That would be a great way for organizations to conceptualise how they approach localisation.

A central government official advised that social cohesion should first be addressed by building trust between local and international actors: '*Create a bond and good relations between local and international organisations for more productive and efficient action. Trust and good relations depend on several cultural factors…How will you manage these cultural aspects in the localisation process'?* Another central government official predicted that this would be a challenge due to the factionalised nature of the landscape and inter-organisational tensions: '*Here are some complexities and a dilemma. Ukhia-based organisations are not thinking of the Cox's Bazar-based NGOs as locals. And then, the Cox's Bazar-based NGOs do not consider the Chittagong-based NGOs as local'.*

Livelihood access was widely viewed as a way to achieve social cohesion by relieving competition over resources. A Bangladeshi UN official explained: '*We need to allow refugees to work. For social cohesion, create entrepreneurship throughout the host community and employ Rohingya for labour in different sectors. There is huge potential of human resources, though we have some constraints including technology, skilled labour and land'.*

Local CSO members also felt that greater social cohesion was possible and that Rohingya should be able to do labour jobs under Bangladeshi management in the camps as a contribution to the regional and national economies: '*Bangladesh is a very peaceful, stable and hospitable country where social cohesion is rich, the management cost is low, and it will easy to implement any action plan*'.

Moving forward

Social cohesion can be strengthened in three ways identified in the *Localisation Roadmap.* These include engagement of the host community in decision-making so that their livelihood, development and other priorities can be reflected in programming. Next, direct engagement between host and Rohingya civil society representatives is a key way to build mutual understanding and sensitisation. With this improved trust and engagement, a local-level dispute mechanism can be utilised with buy-in from all parties to address and resolve problems locally.

Roadmap Output 7: Accountability

> *Government agencies including RRRC, NGO Affairs Bureau (NGOAB), local administration, and local government representatives are supportive of localisation initiatives and seek accountability from local and international service providers.*
>
> **Activities**
>
> 7.1 Advocate for a special window at NGOAB for accelerated processing of proposals related to Rohingya humanitarian response streamlined through an online application portal.
>
> 7.2 Organise workshops for NGOs to engage public officials as resource persons to clarify regulatory requirements for project proposals.
>
> 7.3 Report to CiCs, local administration, local government representatives and the community on the progress of implementation of activities for Rohingya and host communities on a regular basis.
>
> 7.4 Seek the support of local administration and local government representatives to resolve potential conflicts between the host and guest communities.

Overview

Clear policies, efficient approval procedures, and transparency are needed for localisation to be effective. The localisation agenda will be expedited as clear accountability mechanisms are established. Donors require camp access for frequent monitoring to build trust as partners demonstrate their accountability.

Accountability requires multi-stakeholder engagement

Accountability includes ethical, financial, and technical aspects. NGOs are responsible for self-accountability yet this must be backstopped by enforceable legal mechanisms requiring strong governance. Participants emphasised that localisation requires ongoing engagement and mutual accountability across actor. It does not suggest the disengagement of donors. Donors and the INGOs remain involved, but in a different role.

A mindset of shared responsibility and collaboration is therefore needed. Government can facilitate this by clarifying roles and expectations. A civil servant recognised governance shortcomings in regard to accountability: *'Poor governance and corruption are big obstacles. Lack of transparency and accountability is there. There is lack of vision by the government regarding whether to recognise the Rohingya as refugees or not. Thus, INGOs and donor organisations are a bit reluctant to work with their full heart. We need clarity on these issues'*.

A Bangladeshi INGO representative working in the site management sector noted that corruption and extortion are already widespread despite the presence of international humanitarian workers; without this, he feared that the problem would only become more entrenched. A foreign UN official explained that weak mechanisms for accountability and transparency make international actors feel unable to relinquish control.

Concerns about corruption dissuade localisation

A foreign INGO representative expressed concerns about the ability of small local institutions to maintain autonomy. In contrast, local actors felt that international agencies also fail to be accountable and transparent, and identified the need for enforceable policies around issues such as staff poaching, which harms the human resource pool of local agencies. One local CSO member said, *'Transparency is scarce amongst NGOs regarding financial expenditure'*. But another local CSO member felt that local actors were more readily willing to be *'answerable to the local administration, to the law enforcing agency and to the relevant monitoring* agencies' in comparison to INGOs.

Another local CSO member complained about lavish spending amongst international actors, stating: *'A huge number of cars and luxurious offices are used by INGOs, and the lion's share of funds are spent for those activities. In a big pond, the large fish eats the little fish. So large NGOs are grabbing the small local NGOs. There is a huge perception that many NGOs are stealing huge money by using the Rohingya people'*.

There is an assumption that international actors are in a privileged position from which they can access larger administrative costs than local actors. International agencies have significant fundraising capabilities and often finance early and core expenses through private contributions raised abroad. Parity in administrative budgeting should be ensured, and local actors can be supported to diversify fundraising for core expenses.

Balancing autonomy and accountability

One NNGO staff expressed the view that local actors already deserve to be trusted by donors, stating, *'We have the knowledge, understanding and developed skills, now we want to work independently 100 percent'*. When asked how his organisation could continue growing stronger, a member of an unregistered local CSO said, *'We do not see any gaps*

or weaknesses of our organization. We are the most perfect organization to carry out the Rohingya humanitarian response in the camps'.

The perception that INGOs are unmonitored and that the monitoring burden falls solely on LNGOs is a mistaken one, but drives the sense that a paternalistic attitude unfairly leads to burdensome compliance requirements for LNGOs'.

A localisation proponent explained the role government should take toward localisation: '*The central and district administrations will play a role to ensure checks and balances of projects, including progress and transparency. Indeed, key implementation will be carried out by NGOs and the local community people. The accountability of NGOs must be ensured by developing a comprehensive legal mechanism'.*

Moving forward

The *Localisation Roadmap* foresees good governance and mutual accountability amongst actors as key elements of the localisation process, and envisions that government will show its support for localisation by seeking accountability from all service providers. This includes establishing systems for the accelerated processing of proposals to facilitate humanitarian funding, engagements for service providers to receive clear information on regulatory requirements, and ongoing information sharing, reporting, and attention to address and overcome problems amongst stakeholders.

Roadmap Output 8: Specialised knowledge, skills and services

Local and international actors engaged in humanitarian assistance have access to advanced knowledge and skills in the areas of humanitarian assistance, IT-driven management systems, and functional areas.

Activities

8.1 Prepare a database of national and international experts in the areas demanded by local actors.
8.2 Procure international consulting services and undertake quality control.
8.3 Develop the Joint Response Plan in collaboration with the Localisation Driver.
8.4 Undertake fundraising at the international level.
8.5 Manage international visitors in cooperation with the Localisation Driver.
8.6 Identify the areas of complementarity between local and international actors, seeking the short-term role of international experts.

Overview

Different actors are best positioned to provide certain services. Partnerships between local and international actors enable them to complement each other's strengths. Local and national specialists should be prioritised to the greatest possible extent. Talent may be sourced locally, nationally, and internationally as needed. In cases where international expertise must be sourced, it should be done in a manner that transfers experience and skills to a local or national counterpart. Equitable partnership also means that actors identify funding priorities and strive to meet them together, with inputs from affected populations.

Sourcing expertise

There was consensus amongst stakeholders on the need to source local, national as well as international expertise. Individuals and organisations with specific skillsets can be invited to help LNGOs meet the many complex challenges of the response. A Bangladeshi UN official noted, '*Due to the lack of technical graduates in Cox's Bazar, often we have to hire people from outside. Organisations must find ways to fill the gap of local expertise'.*

Participants suggested streamlining the recruitment of local and national experts by developing a roster and inviting qualified persons to join it, including expatriate Bangladeshis living abroad. If expertise cannot be sourced from within the local and national pool, only then should the services of an international consultant be sought.

*A representative from an INGO that already works under a local partnership model explained that Bangladesh could learn from its neighbours and develop policies requiring local-international partnership: '*Not a single project can be launched in Nepal without involving local agencies. This is a mandatory policy requirement and everyone must follow these rules and processes'. The director of an LNGO shared an anecdote to explain how he saw perceived '*expertise'* amongst expatriates as a function of privilege rather than qualification, therefore leading to biased consultant recruitment:

Recently [a researcher] explained that foreigners working in the response are often less qualified and less capable compared to many nationals and locals. Many of them are beginners and immature in this sector. The main difference is that they have money. They can buy a drone to make a geographical map. They have money to hire an expert abroad to help them. If our organisation had money we also could hire an expert...If you gave me a million dollars, I can guarantee you that I would produce a more effective response compared to international and national organisations.

Sector-specific localisation approaches: Education, health and protection examples

Participants pointed out that each sector needs a distinct localisation strategy. Three sectors discussed specifically were education, health and protection. Due to language and curriculum differences between Myanmar and Bangladesh, Rohingya participants argued that Rohingya teachers should be the main educators in the response. For health services, some participants felt that Bangladesh's graduating young doctors and nurses could gain valuable experience by filling short-term positions with international health agencies, resulting in a lasting contribution to Bangladesh's national health sector.

INGO representative working in the protection sector were more reticent to cede leadership, citing concerns about the sensitive nature of this work. One representative commented, '*The LNGOs do not have enough experience or a satisfactory level of standards regarding child protection. They need to overcome some limitations such as their level of knowledge, skills, and organisational culture in order to meet core humanitarian principles'.* Another agreed: '*Localisation is good for some sectors but it is not a good idea for some others like protection. It will take a lot more time for localisation to happen in that sector.'* A thorough analysis of localisation strategies by sector falls outside the scope of this report, but should be further explored at the Cox's Bazar level.

Complementarity means shifting roles

Many participants advocated for international actors to shift their approach to a '*lead from behind*' style in keeping with the vision laid out by the Grand Bargain. According to a Bangladeshi INGO representative whose organization is a global leader on localisation:

INGOs should not go for direct response. They should work hand in hand with local actors. They should transfer the role of implementation to local actors and play a strategic and technical role. They should facilitate and capacitate locals, and keep the process transparent.

Moving forward

The *Localisation Roadmap* proposes that local and international actors embrace a partnership model in which many facets of management including decisionmaking, risk, responsibility, and expertise are shared in a complementary manner. External expertise must be sourced in a more equitable manner and accessible to all actors. Local and national staff and consultants should be prioritised before international expertise is invited. Local-international partnerships may be given special consideration for certain opportunities, such as pooled funds (see Output 3).

Roadmap Output 9: Effective communication systems

> *All participating agencies engaged in the Rohingya humanitarian response practice an effective communication system (Rohingya, Bangla and English) equally understandable to the Rohingya refugees, government, host communities, and relevant international actors.*
>
> ## Activities
>
> 9.1 Develop a tri-language based communication system as and when relevant (e.g. exclusive use of Rohingya/Burmese language in education, training and other communication with refugees).
> 9.2 Develop a group of certified translators/interpreters for communication with refugees.
> 9.3 Ensure translation of the meeting minutes into Bangla and English.

Overview

Language and communication gaps must be addressed *during the* localisation *process*, because equitable engagement amongst stakeholders is impossible without adequate translation and interpretation. Standards and clear guidelines are needed in regard to language usage and communication between actors.

The importance of language

A representative of an INGO working exclusively through a localisation approach explained that the language of the primarily affected population should be prioritised throughout every step of localisation:

Language always comes to the centre of localisation. Comprehensive communication is often missing. People become bored and aggrieved when they are not hearing their local language in a training, meeting or camp operation. Rohingya people understand neither Bengali nor English, only the Rohingya/Chittagonian dialect. Some know Burmese. Therefore, their local language should always be at the centre of communication of the operation.

The linguistic diversity present in the response indicates the need to ensure that language barriers are carefully navigated and that each stakeholder's needs are met. As one UN representative explained, 'We *need to identify which languages to include for communicating better, because there are different languages at play in the Rohingya response. There are Bengali, Burmese, Rohingya, English, and Chittagonian. We have to think about the capacity of different stakeholders and actors, and what languages they are most comfortable with'.*

Local and national views on language

A local CSO member explained that language gaps between refugees and NGOs are problematic:

NNGOs and INGOs are spending a huge amount of money but producing the lowest outcomes as they do not understand the local language and have little understanding of Cox's Bazar and Rohingya cultures. If aid funds came to local agencies instead, they could implement projects more effectively and would produce better outcomes compared to national NGOs. Our management expenditures are little but our development activities are large.

A localisation proponent spoke about the importance of language considerations, explaining that Bengali should be used for written and official communications, and Chittagonian and Rohingya dialects used interchangeably for informal communication and project activities:

The language of localisation will be Bengali. Local languages - especially the Chittagonian and Rohingya dialects - should be the medium of instruction in camp-based schools and other activities. Locals know the local language, which is similar to the Rohingya dialect. This is conducive to easy communication. The Bengali language should be used in daily activities officially, along with the Chittagonian dialect. Many teachers in camp-based schools are teaching in the Bengali language rather than the Chittagonian or Rohingya dialect. Instead, Cox's Bazar-based local teachers and doctors could be recruited.

An NNGO representative suggested, '*Every document should be available in three languages: English, Bengali and Rohingya/Chittagonian. Due to the lack of a standardised Rohingya alphabet, audio versions of communication should be used as well. It is already used by some NGOs'.* In contrast, a civil servant working in the camps was less emphatic about addressing language gaps:

Our local NGOs demand using Bangla language, but the INGOs are reluctant…The Rohingya issue is not permanent. Our main goal is to repatriate them as early as possible, so we should not be very strict about using Bengali. If we don't have enough labour pool with proficient English to do the work, why not develop such skills for existing staff and gradually replace the English-speaking expatriates? For example, each year we will replace 10% of them with national staff.

Fulfilling international donor obligations

UN officials and other donor representatives identified constraints within their communication and reporting systems, making a full conversion to Bangla language impractical: '*One challenge is how donors will respond to working with local NGOs when they can only produce content in Bangla. Currently, donors are not comfortable with that, so we have to bring them on board. We need to address and find solutions to the problem*'. According to another official:

In some cases we have the capability to translate a document before sending it to our main offices. But for the most part, we currently don't have any systematic procedure or enough investment for doing so. And all government meetings are in Bangla, so international colleagues struggle. There should be facilities for both English-to-Bengali and Bengali-to-English translation across meetings.

Another UN representative reflected that English is the common language used by all UN agencies worldwide, an established norm that would be difficult to overcome because all country-level reporting ultimately feeds into a centralised English-language system. She said, '*Language also means having a common culture, for us, our desire is absolutely to work increasingly by sharing operations with local staff and implementing partners. To do so we need a shared and common language. But as a UN Agency we have a very complicated language and procedural system, and a vast competency framework*'.

Community voices on language

Language is closely tied to culture and identity for Bangladeshis as well as Rohingya. Both host and refugee representatives expressed concerns about how their respective linguistic traditions could be hindered as a result of the response. A Rohingya participant said, '*The Rohingya language and culture are going to be influenced by Bangladeshi culture. After repatriation, we could lose our own accent. Also, if we fail to speak the mainstream Rakhine dialect well, we will face serious social discrimination*'. In contrast, a local CSO member worried, '*The local language is changing gradually; children's behaviour and attitudes are also being influenced by the Rohingya people. Protect local culture and language*'.

However, the similarities of language and culture were not always a cause of fear; an imam from a host community mosque saw the cultural similarities between Rohingya and Chittagonians as a reason for the support and solidarity shown by the host community: '*We have many similarities like culture and language. And we have family relationships in both countries. In the past we often maintained communication and social relations between the people of Bangladesh and Myanmar*'.

Likewise, a local CSO member viewed linguistic similarities as a reason for localisation: '*Locals know both the local and Rohingya languages, understand their culture, and maintain sound communication with people in both communities. Therefore, a collective and collaborative response that includes locals' involvement would be more effective*'. Most Rohingya agreed that local people's linguistic capacities give them a great communication advantage over national and international actors; however, one Rohingya representative cautioned against approaches that conflate Chittagonian and Rohingya dialects as identical: '*The hosts don't understand our language completely*'.

Moving forward

Language matters at each level of the response, from the camp to Dhaka level. The divergent views of stakeholders show suggest the need for sensitization about donors' own constraints regarding reporting language. The *Localisation Roadmap* urges a cohesive and consistent approach to translation that makes information and communication equally accessible. This can be accomplished by establishing guidelines on language followed by all actors.

Roadmap Output 10: Learning and policy support

Bangladesh shares its internal learning from localisation with core stakeholders and has access to external learning and policy dialogues at the national and international levels.

Activities

10.1 Publish half-yearly reports highlighting lessons learned (online).
10.2 Maintain contacts with agencies in other jurisdictions having the same agenda and exchange information.
10.3 Support networks, alliances, and coalition activities of NGOs participating in localisation in organising seminars and workshops related to localisation and Rohingya refugee interventions.
10.4 Participate in regional and international policy dialogue on localisation.
10.5 Undertake studies on localisation practice.

Overview

Bangladesh was selected as a *'demonstrator country'* for a multi-agency group of Grand Bargain members to study localisation in detail. The lessons generated from Bangladesh's experiments with localisation in the Rohingya response can be shared for learning by actors in other contexts. As such, ongoing research and knowledge management should be undertaken to determine best practices and distil lessons learnt.

Establishing a baseline

Various participants raised the need for more detailed baseline data when planning for localisation. For example, there is a lack of clear information regarding: the percentage of local and national staff currently employed in the response, the existing but untapped capacities of local people and LNGOs, and the experiences of refugees with regard to service provision by different types of actors across sectors.

One NNGO participant raised concern about the lack of specification in the Grand Bargain about how to establish a baseline and conduct assessments to identify areas where localisation is appropriate. '*A research section is missing in the Grand Bargain. How do we understand the specific needs of the people of Cox's Bazar without research or baseline surveys*'? One participant from an INGO asked, '*Do we have any baseline survey to map the level of capacities and the areas of capacity to develop among the LNGOs and the CSOs? Otherwise how you will be able to develop capacity*'?

A Rohingya participant advocated for the refugee community's involvement in establishing a baseline, stating, '*Rohingya should help map the capacity and expertise of the NGOs, as we know best the quality of services they are providing*'. Another participant, an ISCG sector coordinator, agreed that a process is needed to understand baseline capacities, stating, '*If we want to strengthen the capacity of local actors, what is our goal? Is there any global standard to assess the capacity? We need to set some standards first*'. A government official concurred that the current scope of local capacities was not sufficiently clear: '*We need to figure out what capacities locals have. Can they do evaluations? Do they have capability to review and design? Then they can do needs assessment and delivery*'.

One Bangladeshi INGO director pointed out that a baseline assessment of existing capacities may not be a straightforward process:

Who will map the capacity of an organisation? The bigger challenge is who will monitor, map and certify their level of capacity enhancement? Who will develop that capacity if an expert INGO does not exist? How much time will be allocated to do so? It will not be realistic to expect that funds will come immediately overnight from donor to local organisations. It is a systematic gradual process.

Once a baseline is established, clear targets and indicators can be set. As one participant pointed out, standardised indicators and a transparent monitoring framework would help ensure accountability: '*You need indicators that are measurable and can be easily checked*'.

Building understanding through assessment and monitoring

One of the barriers to localisation is the lack of mutual understanding between actors. As one foreign INGO representative remarked, '*As donors we don't have sufficient knowledge or understanding of local actors' capacity and the challenges they go through. We are keen to support their capacity strengthening for taking up more responsibilities. But before that we need to know the baseline scenario. So the real question is how to create this baseline?*' Another suggested that '*by assessing the local NGOs and sitting with them, we will figure out their problems step by step in terms of capacity, partnership needs, and funding*'.

Another proposed that such assessments should be conducted by a neutral third party: 'A capacity needs assessment should be done by a third party which has no conflict of interest in order to map locals' capacity and the availability of human recourse in the field of health, education, communication, food, culture and communication'.

A Bangladeshi INGO director recommended that a third party should lead monitoring, research and evaluation activities. This party 'will not have any scope for direct delivery or implementation of any project. It will follow up, monitor and assess the gaps between the organizational commitment and the achievement or progress'. An NNGO staff also stated that, 'Monitoring and research should be done by an independent third party, which is free from conflicts of interest. Neither NNGOs nor INGOs are willing to be monitored by their fellow organizations'.

In contrast, a local government representative drew a link between a shift in the role of international actors toward a monitoring role: 'The role of UN agencies and the other INGOs will be to work as a watchdog to ensure checks and balances, managing overall quality by overseeing monitoring, evaluation, and research'.

Joining a global practitioner community

As localisation progresses in Bangladesh, participation in a global community of peer practitioners will be useful. As one Bangladeshi INGO director working closely on localisation explained, 'Globally, the context, dynamic and nature of refugee crisis is unique from one refugee to other. Rohingya refugees are distinct to Somalian refuge. As localisation is a global agenda, different actors have different interest'.

Moving forward

The *Localisation Roadmap* endeavours to resolve research, baseline and indicator needs through an ongoing learning process. This includes conducting ongoing research about localisation in practice, compiling and regularly publishing information on lessons learned, maintaining contact with global practitioners and participating in regional and international events on localisation.

Roadmap Output 11: Establishment of a Localisation Driver

A Localisation Driver is based in Cox's Bazar and accountable to government and donors with suitable organisational set-up, terms of reference, policies and resources and available to facilitate the localisation process among all stakeholders.

Activities

11.1 Select a suitable third-party agency as the Localisation Driver (LD) which meets a set of skills requirements.

11.2 Provide terms of reference to facilitate the implementation of all outputs.

11.3 Equip the office of the LD with human resources, materials, equipment and policies and procedures.

11.4 Develop standardised tools and templates for a) calls for proposals (concept note, detailed proposal, b) reporting formats, and c) monitoring and evaluation frameworks, in consultation with international actors.

11.5 Develop and upload standard policies (HR, finance, administration, procurement, gender, internal control, conflict of interest) for effective organisation management in website.

11.6 Procure local consultancies.

11.7 Support international actors in the procurement of international consultancies.

11.8 Develop a code of conduct for local actors (recruitment, salary level); disseminate and follow up.

11.9 Develop a code of conduct for international experts (recruitment, compensation).

11.10 Hold an 'inception' workshop with stakeholders to communicate about the Roadmap and seek support at the policy and operational level.

Overview

A Localisation Driver (LD) with a strong mandate, broad buy-in, and high-level management capacity is needed to translate the *Localisation Roadmap* into practice, but it should support and monitor rather than enforce. A strong link to government is likely needed to help the LD work smoothly. The LD should oversee implementation of the localisation roadmap, provide training and monitoring support, and ensure that tangible progress is achieved. Guidelines should also be provided for each agency to internally drive its own localisation process as well. The LD should establish a set of specific outputs during the Inception Phase to ensure that localisation becomes more immediately comprehensible, believable and appealing to all stakeholders.

How should the LD drive?

During consultations, four options were explored for the LD's approach to achieving localisation goals: (a) not having any driver and entrusting NGOs with a laissez-faire approach; (b) an NGO holds the driving position; (c) a secretariat of NGOs is formed and the LD role rotates amongst them; or, (d) an independent third party, possibly a new or existing government entity, assumes the LD role with an autonomous secretariat.

According to one UN official, a key function of the LD could be to oversee a pooled funding mechanism. A compliance mechanism would be built into the grant making system, thus obligating participating organisations to meet localisation expectations:

A third-party driver is acceptable. Its alternative name could be 'pooled fund'. It can be driven by a secretariat. If we could develop a pooled funding system this way, then all other systems would be automatically ensured. All NGOs would compromise and follow the same structure, and there would be less conflict and misunderstanding. The LD should be independent in terms of operational checks and balances, and make decisions over money allocation.

Another UN official echoed a third-party secretariat model, stating, '*For the LD, a third party with a secretariat will be more effective and efficient due to its impartial position. It will be capable of coordinating actors and communicating with all relevant stakeholders*'. In contrast, a foreign INGO representative advocated for a laissez-faire approach, stating, '*It has to be done in an organic way. My fear around the Localisation Driver is that there will be huge competition and expectations by all NGOs*'.

National NGO participants in the consultation offered two viewpoints on the following list of ideas to shape the LD: '*Enforcement through a secretariat would be the most appropriate approach; otherwise, coordination and collaboration will be difficult*'. On the other hand, '*A supportive and collaborative taskforce is also preferable as it would be more flexible than enforcement, which many INGOs could dislike*'.

A foreign INGO representative worried that the socio-political climate will hinder the effectiveness of any LD, regardless of how well-structured or clearly mandated: '*Think twice. Many fractions and forums are already visible in Cox's*

Bazar. There are UN forums, INGOs, a private sector forum, a national NGO forum, and local NGO forums. There is also a government forum. Are you creating a separate forum in the name of LD? Yet another new forum? It is unlikely to succeed'.

There is also a need to consider how to fund the LD in a sustainable manner. One Bangladeshi INGO director stated, *'All organisations could contribute from their regular small funds to the LD secretariat. Self-sustainability is very important'.*

Roles to be filled by the Localisation Driver

While the LD would oversee implementation and monitoring on the preceding ten steps in this roadmap, the precise scope, mandate, and limitations need to be carefully considered. A Bangladeshi INGO director doubted that the LD could directly implement the capacity exchange process, but could instead oversee a broader initiative and lead a capacity appraisal system:

A single body will not be able to capacitate the vast number of implementing organisations. It is not realistic. Hence, we need to think about who will take responsibility. Many individuals might think that their mere participation in a workshop meant that their capacity has been built. However, there must be a certain mechanism, an appraisal system, to assess capacity.

She added that a funding stream was necessary to enable meaningful progress on capacity development, stating, *'Without investment, capacity will not be built. The monitoring, bargaining and advocacy work for this could be done by a Localisation Driver'.*

Another INGO director agreed that an LD should be empowered with a clear mandate: *'The idea of having a Localisation Driver (LD) is very interesting but it needs to have a strong mandate from all involved organisations and actors. How do you ensure that mandate? Without the mandate, the system will be another new disaster'.*

Who should drive?

Most stakeholders agreed that no NGO actor, not even a coordination body or non-implementer, should take the lead. A Bangladeshi INGO representative stated:

No NGO should be considered for the LD position. That will not be acceptable. The host people and government provide shelter to Rohingya people, therefore their government and its people should lead the response. But the current socio-political power structure presents an unavoidable challenge that needs to be considered with great attention. The government can handle the process comparatively better. A [high-level government official] should be appointed with an overarching role to coordinate, communicate, facilitate and lead the process.

Except for one UN official who thought that *'restructuring the ISCG could be an alternative solution'*, most stakeholders expressed a view similar to one Bangladeshi INGO representative, who commented that ISCG should not fill the role either:

The ISCG should not be in the LD position. Neither is an NNGO nor INGO appropriate for the LD. Not even a third party coordination platform be considered for LD. Instead, every organisation should have its own individual localisation driver. Driving should focus on the individual level by following certain principles. One size cannot fit all. There will be different demands; buy-in is important.

There was a widespread sense that the government should fill the LD role, with varying suggestions about how to do this. One Bangladeshi INGO official said, *'The government's role is critical in this context as it is an international issue. Outside the government, no NGO will be strong enough to handle the many critical and sensitive issues that will come up. It is not about the capacity but the position'.* National NGO representatives agreed, *'Government should be in the leading or anchoring position of the process by developing a consortium comprised of all relevant stakeholders. Grassroots people trust government agencies more than other actors'.*

According to a government official, *'Government should be the main driver. Also, the government will identify which actor leads capacity strengthening activities'.*

Staff of the RRRC office felt that their agency was well-positioned to take the lead but needed support to do so adequately:

This is an excellent opportunity to utilise the RRRC in the LD position as long as we can shape it according to the response's needs. Currently, we need strengthening capacity. We have acquired vast experience on this particular Rohingya issue, and our agency can work closely with other agencies from neutral ground. But we need more skilled human resources.

Other stakeholders also saw a role for the RRRC. A Bangladeshi INGO representative agreed, *'Government is the ultimate actor for sustainable solutions. Government has the legal power to coordinate and compel any instruction amongst other actors'.* Another said, *'Typically, every agency has some weak sides alongside its strengths. However, as this is the refugee context, therefore, RRRC is most suitable'.*

A foreign INGO representative working closely on localisation within his own organisation shared a concern about the RRRC's ability to fill this role due to questions over its level of influence, stating, '*LD has to be very much powerful or close to the office of the prime minister. It should be headed by a cabinet secretary, or it could be a combination of DC and other government actors*'. Another suggested, '*Can we think for a separate agency, within government, to whom the DC and RRRC will be accountable and will report to? Here trust and wider acceptance is the biggest success factor*'.

A key function of the LD would be to unite actors and overcome divisiveness. As one head of a UN sub-office explained, '*The LD should bring people together. The main goal of LD for me is to bring people to have a common objective, because this should not be about cars or money but rather to utilise the UN and pooled funds amongst every organisation*'. Some participants said the UN should play a role in monitoring, coordination, capacity exchange support, reporting and evaluation.

Moving forward

The LD will need to establish a set of specific outputs during the Inception Phase to ensure that localisation becomes more immediately comprehensible, believable and appealing to all stakeholders. There is consensus that a localisation driver is needed to oversee and coordinate the process. The need for government to play a key role is clear, but this depends on strong support from the central level. A clear Terms of Reference will be essential to clarify the role, get buy-in and ensure that the preceding ten steps of the *Localisation Roadmap* are implemented. It is outside the scope of this report for CPJ to prescribe the LD structure, but the comments included here shed light on the advantages and drawbacks of the various options. The table below presents three options.

CPJ recommends Option 3, though discussion will be needed amongst decision-makers.

		Option 1	Option 2	Option 3
1.	Initiative	Secretariat	Project	Project
2.	Attachment	ISCG	RRRC	Cabinet Division/Economic Relations Division (ERD)
3.	Policy leadership (Project Director)	Hired	Secretary	Secretary
4.	Technical Leadership (Project Manager)	Hired	Hired	Hired
5.	Supervision	Steering Committee	Steering Committee	Steering Committee
6.	Composition of the Steering Committee	ISCG, RRRC, donors, and NGO representatives	UN, donors, RRRC, relevant GO agencies, NGOs	Cabinet Division/ERD, RRRC, other relevant GO agencies, UN agencies, donor agencies
7.	Function	Facilitation of the implementation of the *Localisation Roadmap*	Facilitation of the implementation of the *Localisation Roadmap*	Facilitation of the implementation of the *Localisation Roadmap*
8.	Base	Cox's Bazar	Cox's Bazar	Dhaka and Cox's Bazar
9.	Advantages	• Rohingya response-based. • Easy access to international experts/representatives. • Coordination with the actors easy.	• Country-driven • Localisation is purely Rohingya response-based • RRRC is a relevant GO agency. • Coordination with actors is straightforward	• Country-driven • Getting policy decision from the Government is not lengthy. • Cooperation of all GO/UN/donor agencies at the national and district level expected. • Transparency of the relationship among stakeholders • Potential spill-over effects on the mainland possible.
10.	Disadvantages	• Donor-driven • Cooperation from all GO agencies may not occur • Seeking policy decisions from government may be lengthy	• Seeking policy decisions from government may be lengthy • Cooperation from all GO agencies may not occur	• Two offices (Dhaka and Cox's Bazar) will need resources • Coordination with the actors in the field difficult if the Project Director is Dhaka-based

Conclusions and next steps

This report and the *Localisation Roadmap* were prepared by drawing from nearly 250 pages of consultation and interview notes compiled across meetings with over 100 individuals during a three-month period. While certain areas of agreement have emerged throughout this analysis, there are many divergent viewpoints as well. The roadmap lays out technical aspects of localisation needed for the Rohingya response, but consultations also revealed how trust, relationships and mutual understanding are precursors that need to be strengthened for localisation to proceed effectively.

The implications for localisation to improve humanitarian outcomes will have to be examined closely in a context where the affected refugee population is not itself local. CPJ hopes that all localisation stakeholders absorb the diverse viewpoints expressed in this report with a spirit of openness and that the quotes and comments included in this report help different actors understand each other's interests, limitations, priorities and needs.

Like all aspects of humanitarian aid, the ultimate goal of localisation is the amelioration of human suffering in the wake of crisis. The roadmap outlines a path to achieve this aspiration under the proactive leadership of a Localisation Driver that supports and engages local humanitarian actors, Rohingya self-help groups, host communities, national and international agencies to develop new capacities, approaches to partnership, and accountability toward affected populations. Ultimately, the success of localisation in Cox's Bazar will depend on ongoing cooperation amongst a broad array of stakeholders.

CPJ is of the opinion that there should be an interim arrangement prior to mobilisation of the localisation roadmap. Given the fact that the LTF has played such a critical and constructive role so far, CPJ recommends that it will be appropriate for LTF to guide the present process to put in place an institutional arrangement.

PART II: Detailed Results Framework

This section provides the full scope of activities under each of the 11 outcomes comprising the roadmap.

Roadmap Output 1: Capacity Exchange and Professional Development of the Actors

Local actors demonstrate enhanced capacities in the areas of a) programme management, b) institution building, c) sectoral technical knowhow unique in humanitarian assistance and d) protection and gender issues, in order to serve the needs of refugees (figure 6).

Key Performance Indicators						
Subject	Baseline	Target				Means of Verification
		Month 6	Year 1	Year 2	Year 3	
NGOs participating in the Rohingya humanitarian response (RHR) use a set of prescribed policies: finance, human resources, board of directors, gender, procurement system, conflict of interest, reporting.	X%	70%	100%	100%	100%	Policy review and organisational assessment
NGOs participating in the RHR use IT-driven results-based management systems for project design, monitoring and reporting.	X%	50%	100%	100%	100%	Documentation and management review
Staff members of NGOs participating in the RHR are certified/skilled in respective technical areas of operation.	X%	50%	100%	100%	100%	Management review
Cox's Bazar-based resource persons in various technical areas are available to serve as freelancers.	X persons	5 persons in each sector	5 persons in each sector	5 persons in each sector	5 persons in each sector	Documentation review, FGD with resource persons

Organisational Management
- Transparency, accountability, leadership
- Management, HR, finance, communications

Programme Management
- Results-based management
- Report writing, proposal writing

Functional Areas
- Education, site management, skill development, WASH, health, nutrition, midwifery, etc.

Training of Trainers
- TOT to selected trainees
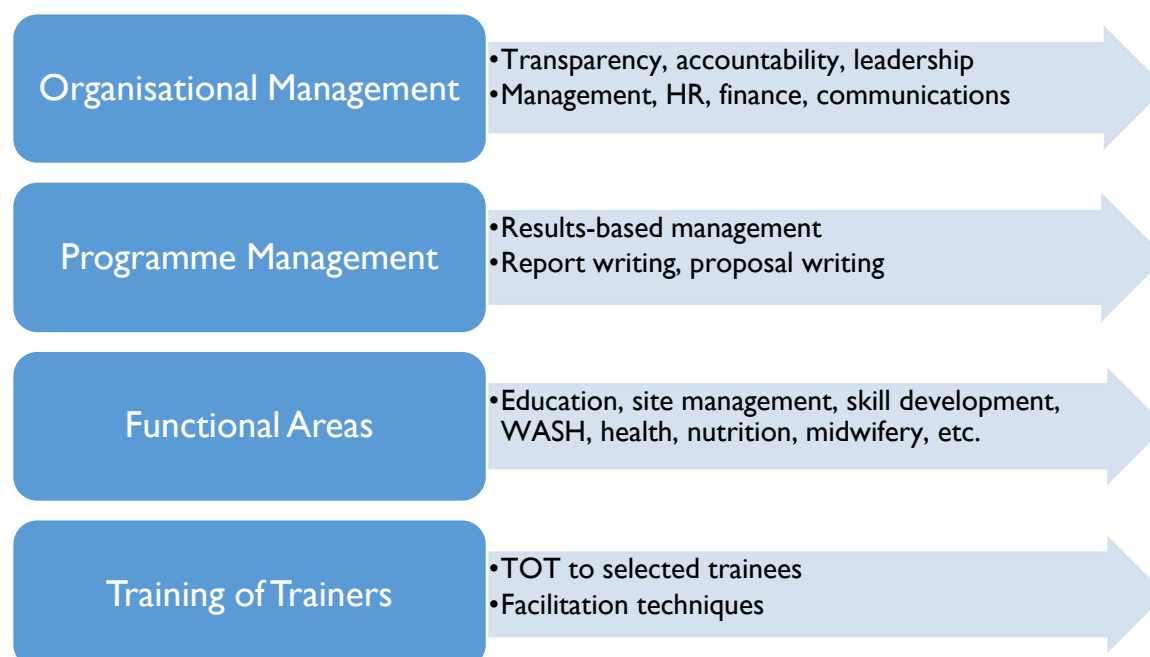- Facilitation techniques

Figure 6: Areas of knowledge and skills

Roadmap Output 1: Activities

Activity 1.1: Training opportunities

Provide need-based and demand-driven basic and advanced training in the following areas, using Bangla as medium of communication:

a. Programme development and project cycle management, including context analysis, need assessment, planning, monitoring, internal evaluation, participatory approaches, proposal and report writing
b. Transparency and accountability
c. Sectoral technical aspects of humanitarian assistance, including the Sphere Standards as well as sector-specific capacities such as WASH, shelter, food security, health and nutrition[2]
d. Protection and gender
e. Financial management and monitoring
f. Research skills
g. Communication skills, including nonviolent communication, public speaking, presentation skills, report writing and meeting facilitation
h. Conflict resolution
i. Management of self-help groups and community-based approaches
j. Principles of ethics and values in humanitarian assistance
k. English language

Rationale: International actors will be more inclined to entrust local NGOs with more responsibility if they believe that these NGOs already possess knowledge and skills in various areas of development. Training on certain knowledge and skills would enhance local actors' organizational, technical and program management profile, enabling them to become more efficient and effective.

Activity 1.2: Training of trainers

Provide long-term training of trainers (TOT) to develop a team of certified local resource personnel to address the ongoing consultancy needs of local actors, including internal policy, management, thematic and operational activities.

Rationale: Local resource persons will need demand-driven, continuous support; a short training or workshop on these skill areas may not suffice.

Activity 1.3: Workshops and refreshers

Organise workshops and refresher trainings to continuously update actors' knowledge and skills.

Rationale: Participants may struggle to apply the knowledge and skills, so an organised session for refining and clarification would be helpful.

Activity 1.4: Online learning

Introduce an online self-learning portal for local actors to self-assess and learn continuously.

Rationale: Many professionals, being already conversant with the required knowledge and skills, may want to assess their own capability and participate in online learning.

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[2] See www.spherestandards.org for details

Roadmap Output 2: Community-Building Amongst Rohingya Refugees

Rohingya self-help groups (SHGs) are conversant with humanitarian principles, group management and respective areas of sectoral and technical engagement, and are willing to collaborate with camp-based service providers (local actors) in various areas (figure 7).

Key Performance Indicators						
Subject	Baseline	Target				Means of Verification
		Month 6	Year 1	Year 2	Year 3	
SHGs preferred by refugees in different areas.	0 SHGs	2	10	10	10	Camp records
% of SHG leaders who can describe roles, human principles and how they will provide services if needed.	0%	100%	100%	100%	100%	Individual interviews
% of SHG members who participate in meetings to discuss and review activities regularly.	0%	80%	80%	80%	80%	Meeting minutes

Building SHGs — Camp-based, Rohingya communities prioritise their chosen types.

- Formation and development of SHGs

Capacitation — Gather information about the existing SHGs and link with professionals.

- Add to and build upon the existing SHGs

Consolidation — Rotate leadership, engage women and youth.

- Practice, innovate and change

Figure 7: Development Process of Self-Help-Groups

Roadmap Output 2: Activities

Activity 2.1: Formation of SHGs

Organise workshops to motivate Rohingya refugees, particularly youth and technical experts, to form SHGs in their areas of interest. Some examples include:

- First aid
- Nutrition
- Mother and child health
- Adolescent girls
- Youth
- Food distribution
- Paralegalism
- Conflict resolution
- Care for seniors
- Care for people with disabilities
- Burial
- Repatriation
- Birth registration

Rationale: Many Rohingya people have technical backgrounds, communication skills, and the motivation to serve their camp communities; their potential human resource contributions have not been thoroughly mapped by the humanitarian sector. By organising themselves in SHGs based upon their areas of interest and capability, they may play a constructive role in Bangladesh now and in Myanmar after their potential repatriation.

Activity 2.2: Survey of skills

Conduct a survey among the refugees to create a human resource inventory, differentiated according to various skill areas.

Rationale: Documenting the refugees' knowledge and skills will facilitate their most effective use within the SHGs.

Activity 2.3: Specialised training

Provide training to SHGs on group management, group leadership, humanitarian principles and need-based specific sectoral skills, e.g., education using the Myanmar syllabus and language.

Rationale: Running the specialised SHGs may require more than the existing knowledge and skills, given that the refugees were largely deprived of organised efforts to improve their livelihood in Myanmar.

Activity 2.4: Gain government recognition

Seek government approval to operate the SHGs in the camps as a complementary implementer of humanitarian assistance.

Rationale: Organising the refugees into SHGs could be misunderstood as a camp-based social or political movement, which may act against government policy; harmonisation with government priorities and guidelines is essential. The principal argument in favour of skilled SHG formation is that they may play a proactive role in potential repatriation, being in the best position to support their own communities.

Activity 2.5: Continuous mobile learning

Introduce mobile online self-learning portals for continuous learning and experience sharing through the SHGs.

Rationale: The SHGs will need continuous updating of their knowledge and skills beyond the initial training.

Activity 2.6: Quarterly meetings

Organise a quarterly SHG coordination meeting.

Rationale: By sharing their experiences and knowledge, the various SHGs will have the opportunity for integration and enrichment.

Roadmap Output 3: Cost-Effectiveness and Improved Funding Practices

Donors, UN agencies and INGOs operate innovative funding mechanisms including pooled funds, direct funding and network funding, to engage capable and competitive local actors as partners (figure 8). This addresses the needs of both the Rohingya refugees and host communities, as well as the capacity exchange needs of local actors and Rohingya SHGs in a systematic manner.

Key Performance Indicators						
Subject	Baseline	Target				Means of Verification
		Month 6	Year 1	Year 2	Year 3	
% of local actors who can download information online about a) types of funding, b) application systems, c) assessment systems and d) reward systems available to them.	0%	80%	100%	100%	100%	Users' records
% of actors who can view a database of local actors differentiated according to a) location of head office, b) target group, e.g., women, disability, children, c) women in leadership and d) area of specialisation.	0%	80%	100%	100%	100%	Users' records
% of all local actors who can describe the criteria and process of accessing funding for various funding tools.	X%	80%	100%	100%	100%	Individual interviews
% of all local actors' proposals that satisfy the funding criteria required by donors.	X%	50%	80%	90%	100%	Review of proposals

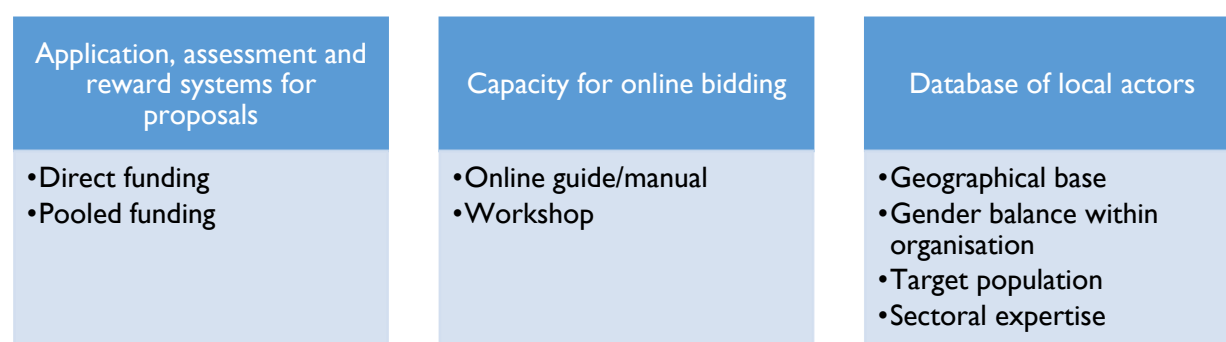| Application, assessment and reward systems for proposals	Capacity for online bidding	Database of local actors
• Direct funding • Pooled funding	• Online guide/manual • Workshop	• Geographical base • Gender balance within organisation • Target population • Sectoral expertise

Figure 8: Core functions of fund managers

Roadmap Output 3: Activities

Activity 3.1: Standardised funding procedures

Develop standardised guidelines, operational and compliance procedures for innovative funding tools (call for proposals, assessment system and rewards modality) by donors, UN and INGOs.

Rationale: Local actors expect funding agencies to implement standardised funding procedures. This would reduce transaction costs and establish more procedural transparency.

Activity 3.2: Online bidding workshop

Provide a workshop for local actors (national and Cox's Bazar-based NGOs) in Bangla or English on online bidding procedures.

Rationale: Assuming that a standard funding mechanism will be implemented, the workshop will address possible confusions and establish clarity on how to respond to the call for proposals. Offering a workshop guide in Bangla would help the local actors, who are generally less conversant in English.

Activity 3.3: Database registration

Encourage local actors to enlist in a database online, differentiated according to geographical focus and profile including area of expertise, management structure, organisational development status, programme management capacity and awareness about humanitarian principles, and update their profile regularly.

Rationale: Participation in the database will help the funding agencies to get to know local actors in terms of their specialisation, type of leadership (e.g., female-led or not), core beneficiaries (such as children, the elderly, and people with disabilities, the ultra-poor), their geographical coverage, staff strengths, physical facilities, registration status, and track record in the area of humanitarian assistance. With an app, local actors can register and update their profiles and communicate with the funding agencies.

Roadmap Output 4: Effective Camp Management

All refugee camps are managed following international humanitarian principles. Camp management personnel uphold policies, division of labour and guidelines jointly developed by the government and other actors (Cox's Bazar-based NGOs, CBOs/CSOs, SHGs, national NGOs, INGOs and UN agencies).

Key Performance Indicators						
Subject	Baseline	Target				Means of Verification
		Month 6	Year 1	Year 2	Year 3	
All camps have a 3-year rolling plan for the type of services needed, indicating the role of local actors, international actors, SHGs and local suppliers, along with budgetary requirements.	Not structured enough.	Yes	Yes	Yes	Yes	Document review
All camps have a set of agreed values, principles and policies to govern the operations they should follow.	Not commonly agreed upon.	Yes	Yes	Yes	Yes	Document review
All camps produce quarterly reports on the implementation of the plan and the compliance of the values, principles and policies.	Not structured enough.	Yes	Yes	Yes	Yes	Document review

Roadmap Output 4: Activities

Activity 4.1: Infrastructure maintenance plan
Draw a 3-year rolling plan to maintain physical, social and institutional infrastructure, including but not limited to:

- Shelter
- WASH
- Education
- Healthcare
- Markets
- Graveyard
- SHGs
- Policies
- Security of women, girls, and children

Standard guidelines must be followed, developed in consultation with local and international actors as well as credible representatives of the Rohingya communities.

Rationale: The localisation initiative will only work when the government - represented by RRRC and the local administration - agrees on the physical, social, and institutional infrastructures to be maintained for Rohingya refugees. Supported by international actors, the Localisation Driver (LD) will seek compliance with refugee rights standards as per Bangladesh's agreements.

Activity 4.2: LD NGO assessment
Seek the services of the LD to find suitable local actors from the available applicants and international actors where necessary to maintain services at the camp level.

Rationale: The LD will have the technical capacity to assess the suitability of NGOs by maintaining a publicly accessible database of local actors. The LD will need access to the camps to consult the camp administration about previous experiences and to follow up on the activities of the local practitioners.

Activity 4.3: Local actor SHG formation
Allow the chosen local actors to facilitate the formation of Rohingya SHGs in various technical areas to service the refugees.

Rationale: With access to the camps, local actors can motivate the communities to organise themselves under various SHGs, following up on the activities of the local practitioners.

Activity 4.4: Conflict resolution system

Establish and maintain an informal conflict resolution system for intra-Rohingya and Rohingya-host community conflicts, in consultation with all parties.

Rationale: Any conflicts that arise must be resolved in a non-partisan manner following the basic principles suggested by the public legal aid system of arbitration and mediation. This will foster peace and harmony in a post-conflict situation.

Activity 4.5: Relaying government policies

Communicate government policies on living in the camp and repatriation.

Rationale: As the formal camp-level mouthpiece of the government, any information and instructions related to the refugees should be relayed through the camp administration.

Activity 4.6: Monthly camp report

Prepare and disseminate a monthly camp report to the stakeholders using a standard template.

Rationale: The template will convey the necessary data to the government and donors, showing comparative performance and ensuring the camps are managed in a standardised fashion.

Activity 4.7: Support for international guests

Provide support to the localisation drivers and international actors during guest visits.

Rationale: The donors, UN agencies and INGOs may occasionally send visitors to undertake onsite assessment to justify future funding. The camp administration will need to grant them safe access to view the physical facilities and interview Rohingya communities.

Activity 4.8: Monitor actor activities

Monitor the activities of the organisations operating in the camps with respect to their action plans and share observations in weekly meetings.

Rationale: There is a need for transparency and accountability among the local, internal and public actors.

Activity 4.9: Tri-lingual communication system

Introduce tri-lingual communication system, using Bangla as the base.

Rationale: Rohingya communities communicate in Rohingya language, while the donors, UN agencies and INGOs need English translation.

Roadmap Output 5: Development Services for the Host Communities

The host communities have access to preferred status in suitable employment, as suppliers of agricultural goods for the refugees through local procurements, sustainable household energy systems, and community assets and institutions such as roads, community clinics, and schools (figure 9).

Key Performance Indicators						
Subject	Baseline	Target				Means of Verification
		Month 6	Year 1	Year 2	Year 3	
% of Cox's Bazar-based employees increased, including participation of x number (M, F) in management position.	X% of Cox's Bazar-based employees (M: 50%, F: 50%) X number (M and F) in management positions.	30% 1	50% 2	50% 2	50% 2	
% of local farmers and traders of locally produced agricultural goods.	X%	30%	50%	60%	60%	
% of host community households using subsidised improved fire stoves.	X%	30%	50%	70%	90%	
% of villages connected to rural roads and markets.	X%	30%	50%	70%	100%	
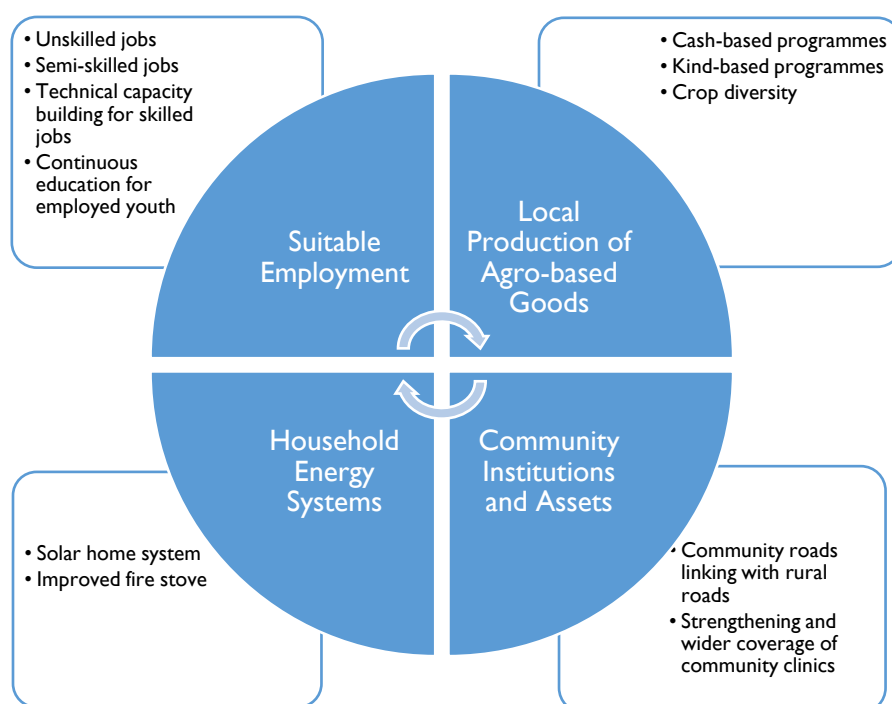
Figure 9: Core interventions for the host communities

Roadmap Output 5: Activities

Activity 5.1: Recruitment policy

Develop and introduce a common recruitment policy to engage local people in the Rohingya humanitarian response associated with capacity building and continuous education.

Rationale: Developing a common recruitment policy with similar salary structure for similar posts will help to recruit a certain percentage of the local youth as staff members and avoid poaching. In addition, by offering job training opportunities to youth from the host community, they may become increasingly engaged in mid-level positions. The youth may be encouraged to pursue part-time formal education at the college level through access to evening and weekend courses, assuring parents that Rohingya influx-induced jobs will not put an end to their education.

Activity 5.2: Agricultural diversification

Introduce a farming system or crop diversification model for profitable farming using the services of the Department of Agricultural Extension.

Rationale: Currently, the depressed price of rice due to the sale of relief items in the market is negatively impacting the host communities, who rely on rice cultivation. Therefore, farmers will be provided with technical assistance and counselling by the Department of Agricultural Extension or other agro-marketing experts to cultivate a different mix of crops, carrying better market opportunities.

Activity 5.3: Farmer engagement

Encourage the private sector and farmers to participate in the supply chain by delivering products to Rohingya refugees associated with capacity building for bidding.

Rationale: The host community will enjoy an increased share in the supply chain if farmers participate not only as producers but also as suppliers to buyers and markets that cater to the refugees.

Activity 5.4: Infrastructure development

Support the development of host community infrastructure as prioritised by the community, for example:

- Roadside plantations
- School development
- Road development
- Community clinics
- Sustainable household energy systems

Rationale: Some negative impacts of the Rohingya influx can be compensated through investment in the host community. For example, the loss of the land's forest share can be partially counteracted through afforestation on public roads. In addition, host communities may be supported by household energy systems to overcome the firewood deficits caused by the loss of forest resources.

Roadmap Output 6: Social Cohesion

Host communities, represented by local government representatives (LGRs), are included in decision-making, are sensitive about the plight of the refugees and the necessity for expected humanitarian attitude towards them, and have a conflict resolution system in place (figure 10).

Key Performance Indicators						
Subject	Baseline	Target				Means of Verification
		Month 6	Year 1	Year 2	Year 3	
LGRs of the union and upazila parishads surrounding the camps participate in quarterly camp meetings.	No	Y	Y	Y	Y	Minutes
% of LGRs who can describe government policies and obligations to respect humanitarian principles in the Rohingya response.	X%	50%	70%	80%	90%	Interviews
# of monthly collaborative sports, cultural and social events between Rohingya and host communities.	X	1	2	2	2	Observation/ media
A conflict resolution system, as introduced by legal aid office of the district court, resolves conflicts (by CiCs and LGRs):	X	Y	Y	Y	Y	Resolutions
% of conflicts within camps, excluding crimes.	X%	50%	All	All	All	
% of conflicts between refugees and host communities, excluding crimes.	X%					
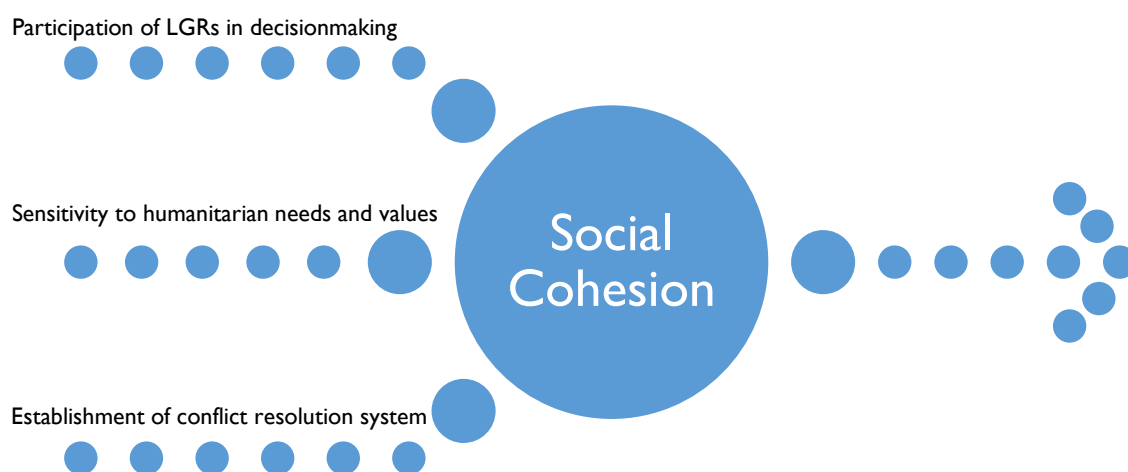
Figure 10: Core determinants of social cohesion

Roadmap Output 6: Activities

Activity 6.1: Community update meetings

Organise regular ward-wise community meetings with the involvement of LGRs on the various aspects of the Rohingya humanitarian response, the Government of Bangladesh's policy, and roles arising for the communities.

Rationale: These meetings will bring awareness and sensitisation to the refugees' unique circumstances, which they should not be held accountable for. In addition, they will communicate government action plans for refugee repatriation as well as compensation to address the sacrifices made by host communities.

Activity 6.2: Rohingya community meetings

Support regular meetings between the LGRs and representatives of Rohingya refugee communities to discuss issues of mutual interest.

Rationale: Codes of conduct must be communicated to the Rohingya communities, in order to ensure a peaceful social environment.

Activity 6.3: Conflict resolution system
Establish a conflict resolution system by engaging LGRs, representatives of Rohingya communities, and camp administration to address potential conflicts.

Rationale: Conflicts must be resolved in a timely fashion with the involvement of the camp administration and local government representatives.

Roadmap Output 7: Accountability

Government agencies including the RRRC, NGO Affairs Bureau (NGOAB) and local administration bodies are supportive of localisation initiatives and seek accountability from local and international service providers (figure 11).

Key Performance Indicators						
Subject	Baseline	Target				Means of Verification
		Month 6	Year 1	Year 2	Year 3	
Local actors and SHGs submit quarterly reports to the RRRC against their general refugee response work plans.	N	Y	Y	Y	Y	Reports
Local actors submit yearly progress and audit reports to NGOAB against approved plan.	Y	Y	Y	Y	Y	Reports
Local actors submit quarterly host community reports and present to upazila meetings.	Y	Y	Y	Y	Y	Minutes
LGRs can describe which activities for host communities are being implemented by local actors.	N	Y	Y	Y	Y	Interviews
Local actors' board holds regular meetings and seeks the executives for Q&A on internal audit report.	N	Y	Y	Y	Y	Minutes
Local actors submit bi-annual program and financial reports to donors and quarterly internal control reports.	Y N	Y	Y	Y	Y	Report
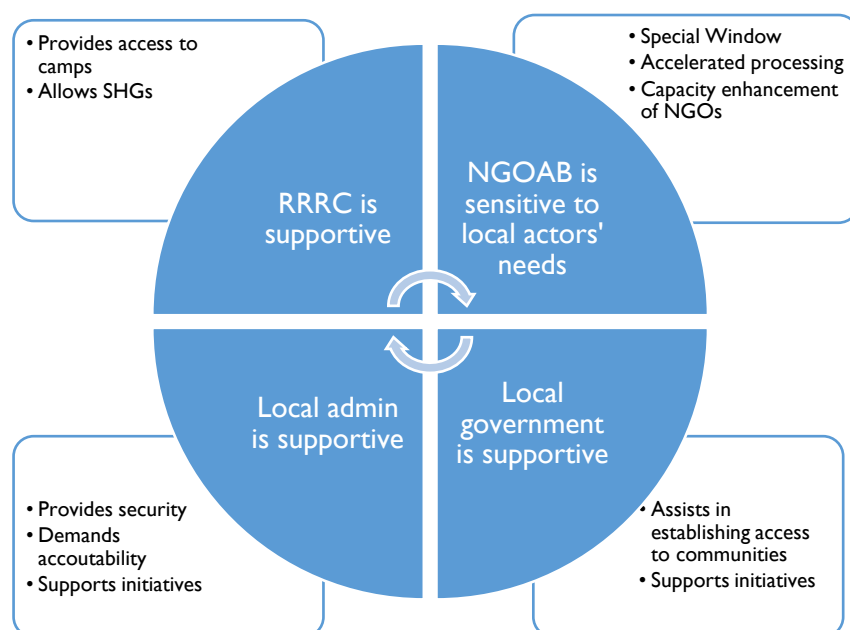
Figure 11: Levels of accountability

Roadmap Output 7: Activities

Activity 7.1: Specialised NGOAB window

Advocate for a special window at NGOAB to accelerate processing of all proposals related to the Rohingya humanitarian response, streamlined through an online application portal.

Rationale: The project proposals related to Rohingya refugees embody an emergency and humanitarian response requiring quick turnaround. The government, represented by NGOAB, security agencies and line agencies, should follow a different approach in processing the proposals than they would for those concerning Bangladeshi nationals. Agencies supporting Rohingya initiatives expect services to reach the refugees in a timely fashion; acceleration of the approval process is needed.

Activity 7.2: Project proposal workshops

Organise workshops for NGOs to engage with public officials brought in as resource persons to clarify regulatory requirements for project proposals.

Rationale: Government agencies frequently cite improper submission of project proposals by the NGOs as a reason for delayed approval. Thus, there is a need for a workshop with relevant government officials to help the local actors in Cox's Bazar understand requirements and submit proposals properly.

Activity 7.3: Progress reporting

Report to the CiCs, local administration, LGRs and the community on the progress of activity implementation for the Rohingya and host communities on a regular basis.

Rationale: Although many initiatives supporting the wellbeing of refugees are externally donor-funded, as the approver of proposals, the government assumes responsibility for ensuring that implementing organisations follow the country's regulations. By being accountable to relevant public agencies, local government, and communities, the implementing organizations have the opportunity to establish favourable and transparent track records, which will make them more fundable.

Activity 7.4: Conflict resolution support

Seek the support of local administration and LGRs to resolve potential conflicts between host and guest communities.

Rationale: The NGOs occasionally operate under tense conditions, with inter and intra-communal conflicts arising at times. The conflict resolution system of implementing NGOs may be more effective if the representatives of the local administration and local government participate in the dispute resolution process.

Roadmap Output 8: Complementary and Demand-Driven Support from National and International Actors

Local and international actors engaged in humanitarian assistance have access to advanced knowledge and skills in the area of humanitarian assistance, IT-driven management systems, and functional areas (figure 12).

| Key Performance Indicators						
Subject	Baseline	Target				Means of Verification
		Month 6	Year 1	Year 2	Year 3	
Local actors can access a regularly updated database of national and international experts available to provide consulting services in areas including gender mainstreaming, protection, programme and organisational management, sector-specific and thematic expertise, and monitoring and evaluation services.	None	Y	Y	Y	Y	Web search
Local and international actors receive support for contracting, recruitment, selection, TOR development and negotiation, and quality control of the service consultants.	N	Y	Y	Y	Y	Contracts and reports
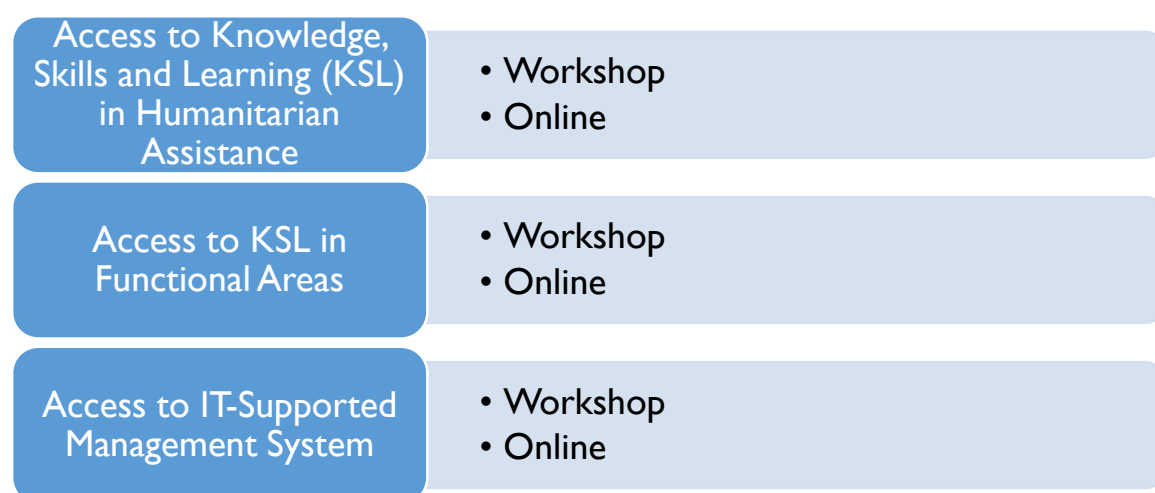
Figure 12: Access to Knowledge, Skills and Learning (KSL)

Roadmap Output 8: Activities

Activity 8.1: Expert database
Prepare a database of national and international experts in the areas of local actors' demand.

Rationale: There are some skills that will need to be outsourced if they are not available locally. An expert database will assist in finding an appropriate candidate faster than an open search.

Activity 8.2: Consulting and quality control
Procure international consulting services and undertake quality control.

Rationale: Any specialised knowledge or skills outsourced by local actors will need to be assessed for quality. As local actors are unable to hire international experts due to foreign currency-related restrictions, the LD could partner with a UN or donor agency for the purpose of hiring.

Activity 8.3: Joint Response Plan
The LD is engaged in the development of the annual Joint Response Plan (JRP).

Rationale: Local actors, including camp administration, should actively participate in the JRP to ensure that funding appeals are driven by the needs identified by local actors and affected communities.

Activity 8.4: International fundraising
Undertake fundraising at the international level.

Rationale: The local actors may not be effective enough in fundraising to act alone. Therefore, the LD will require international expertise to use the data and participation of affected communities in the fundraising process.

Activity 8.5: International visitors

Manage international visitors in cooperation with the LD.

Rationale: International representatives may be sent to the camps to assess the need for humanitarian assistance, justify the support intended, and observe/evaluate the impact of funded programmes. The LD will address the need to support donors, UN agencies and INGOs while undertaking field visits.

Activity 8.6: Supporting local actors

Identify complementary areas between local and international actors, seeking short-term roles for international experts.

Rationale: International experts may provide temporary support to develop the capacities of local actors, who will be groomed for long-term involvement.

Roadmap Output 9: Effective Communication Across Stakeholders

All participating agencies engaged in the Rohingya humanitarian response practice an effective communication system including Rohingya, Bangla and English (figure 13). Communications are equally understandable to the Rohingya refugees, the government, LGRs, host communities and relevant international actors.

Key Performance Indicators						
Subject	Baseline	Target				Means of Verification
		Month 6	Year 1	Year 2	Year 3	
Refugees receive all written information in Burmese and English, and via Rohingya language audio.	N	Y	Y	Y	Y	FGDs with refugees
All communications involving local actors related to Rohingya humanitarian assistance happen in a bilingual format, for both oral and written communications.	N	Y	Y	Y	Y	Document review

Figure 13: Determinants of effective communication

Roadmap Output 9: Activities

Activity 9.1: Tri-lingual communication system
Develop a tri-language communication system to be used where relevant; Rohingya language may be used exclusively in some cases; in others such as education and training, the Burmese language will also be used.

Rationale: Rohingya communities do not always understand the content of communications, because of the use of Bangla or English. It is assumed that host communities understand Rohingyas and vice-versa, but training and instructions may not be communicated effectively. Similarly, donor meetings and their minutes are generally conducted in English, so many local NGOs cannot contribute to the meeting or understand documents sufficiently. In addition, the Rohingya language and Burmese syllabus should be used to deliver education; otherwise, the children's relationship with their motherland and future desire to return may be negatively impacted. Hence there is a need for selective tri-lingual communication.

Activity 9.2: Translators and interpreters
Develop a group of certified translators and interpreters for communication with the Rohingya refugees.

Rationale: Members of both the host and refugee communities should be specifically trained in translation and interpretation to relay all communications involving Rohingya refugees. This will ensure that effective and accurate communication takes place, beyond the involvement of merely an educated person from either community, which may inadvertently foster gatekeeping.

Activity 9.3: Meeting minutes translation
Ensure bilingual translation of all meeting minutes in Bangla and English.

Rationale: Translation of relevant written documents will ensure equal participation in discussion, decision-making and dissemination. Consequently, effective communication will contribute to greater success in localisation.

Roadmap Output 10: Learning and Policy Support

Through a Monitoring and Learning Cell (MLC), Bangladesh shares its internal learning from localisation with core stakeholders and has access to external learning and policy dialogues at the national and international level (figure 14).

Key Performance Indicators						
Subject	Baseline	Target				Means of Verification
		Month 6	Year 1	Year 2	Year 3	
All stakeholders receive 'lessons learnt' reports compiled from localisation practices in Cox's Bazar half-yearly.	N	Y	Y	Y	Y	Reports
All stakeholders receive consolidated 'lessons learnt' reports from localisation practices and similar initiatives in other jurisdictions.	N	Y	Y	Y	Y	Reports
National and international policymakers receive demand-driven analytical support on localisation initiatives in Cox's Bazar.	N	Y	Y	Y	Y	Reports

Internal Learning
- Documents lessons learnt
- Disseminates online and addresses queries

External Learning
- Gathers lessons learnt from other countries and organisations
- Disseminates online and connects with other practitioners

Policy Support
- Provides analytical support to the government and donors
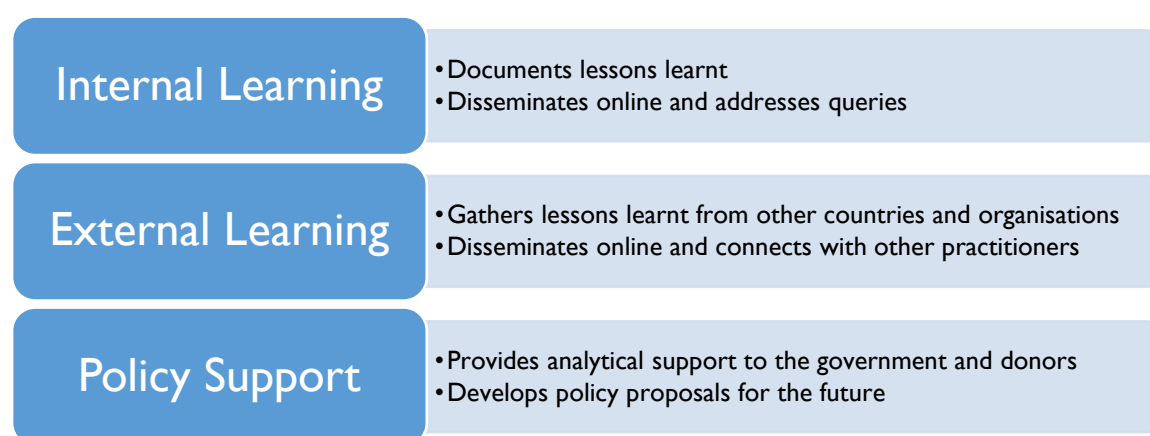- Develops policy proposals for the future

Figure 14: Roles of the Monitoring and Learning Cell (MLC)

Roadmap Output 10: Activities

Activity 10.1: Knowledge reports
Publish half-yearly reports online highlighting lessons learnt.

Rationale: The knowledge gained through localisation should be equally communicated to both internal and external stakeholders. Their feedback should play a role in designing the roadmap.

Activity 10.2: Complementary agency communication
Maintain contact and exchange information with agencies in other jurisdictions that have the same agenda.

Rationale: All practitioners of localisation in Bangladesh should learn from the experiences of other countries having the same initiatives. This will also help to assess the Bangladesh experience.

Activity 10.3: Organising localisation-based activities
Support networks, alliances and coalition activities of NGOs participating in localisation; collaborate to organise seminars and workshops related to Rohingya refugee interventions.

Rationale: Supporting and guiding the learning process around localisation will help organise, foster, and collect creative and critical reflection.

Activity 10.4: Localisation policy dialogue
Participate in regional and international policy dialogue on localisation.

Rationale: Robust data can be gained through dialogue with national and international localisation practitioners, providing a policy foundation based on actual experience.

Activity 10.5: Learn from localisation practices
Undertake studies on localisation practices.

Rationale: If initiated, the localisation of the Rohingya humanitarian response will create a need for researchers, both local and international. The initiative itself may also undertake operational, evaluative, descriptive and issue-based research, creating a vast knowledge base for further development of localisation in Bangladesh and worldwide.

Roadmap Output 11: Facilitation of Localisation

A Localisation Driver (LD) will be based in Cox's Bazar and accountable to the Government of Bangladesh and donors with a comprehensive organisational set-up, TOR, policies and resources; the LD will be available to facilitate the localisation process amongst all stakeholders (figure 16).

| Key Performance Indicators						
Subject	Baseline	Target				Means of Verification
		Month 6	Year 1	Year 2	Year 3	
Government and donors agree to engage an LD with the coordination and facilitation of localisation efforts in Cox's Bazar.	N	Y				Resolution
All relevant stakeholders receive the TOR and list of services to be delivered by the LD.	N	Y				Distribution
The representatives of the relevant stakeholders are able to list the roles and responsibilities of localisation actors, and understand it as a change management process.	N	Y				Interview
Local and international actors start to receive services from the LD office.	N	Y	Y	Y	Y	Interview
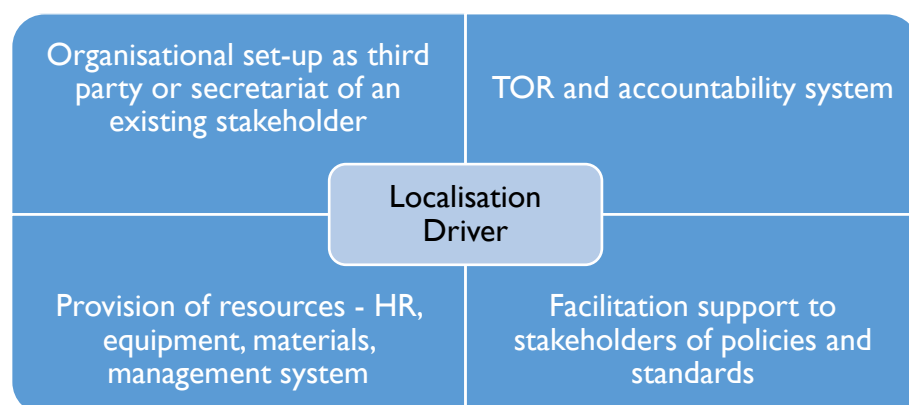
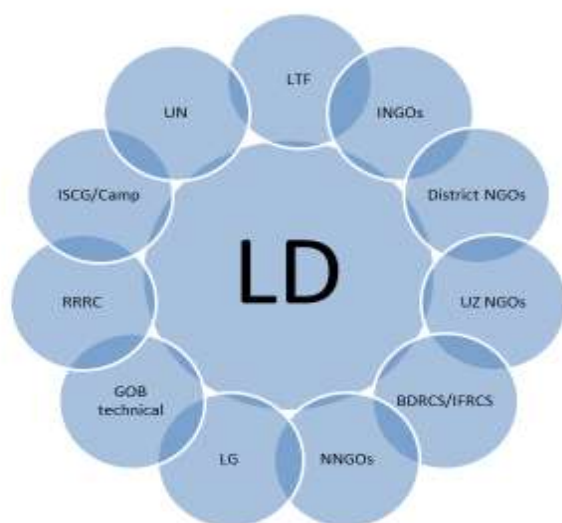Figure 15: Core inputs for the localisation driver

Figure 16: Constituents of the Localisation Driver (LD)

Roadmap Output 11: Activities

Activity 11.1: Selecting the LD

Select a suitable third-party agency as the LD, which must meet a set of skill requirements.

Rationale: In consultations, numerous stakeholders expressed their approval of a third-party agency to serve as the facilitator of localisation in order to avoid potential conflicts of interest. In addition, the LD will need a specific set of skills and focus, so housing a LD secretariat within an existing agency was seen as less desirable. In contrast, a third party can also work with greater impartiality.

Activity 11.2: TOR for outputs

Provide a TOR to facilitate the implementation of all outputs.

Rationale: The delivery of the aforementioned outputs listed under this *Localisation Roadmap* must be shared amongst stakeholders. Agreement should be reached about which outputs will be delivered by whom and what role the LD will play in the process. The TOR will be the basis of the periodic performance review of the LD.

Activity 11.3: Supplying the LD

Equip the office of the LD in Cox's Bazar with human resources, policies and procedures, materials and equipment.

Rationale: The office of the LD should be based in Cox's Bazar District, as localisation practitioners have a strong presence there and most activities will be carried out there. Close proximity to the site of operations provides the LD with enormous scope to document, learn and drive the process toward the stated outcomes and impacts.

Activity 11.4: Standardised tools and frameworks

In consultation with international actors, develop standardised tools and templates for a) calls for proposals - including concept note, detailed proposal and budget templates; b) reporting formats; and, c) monitoring and evaluation frameworks.

Rationale: In various consultations, stakeholders recommended the standardisation of tools and frameworks for use by localisation practitioners. The LD will be the best positioned actor to coordinate and negotiate with funding agencies and the government to minimise associated transaction costs.

Activity 11.5: Standard policies

Develop and upload standard policies to the website for effective organisational management, including:

- Human resources
- Finance
- Administration
- Procurement
- Gender
- Internal control
- Conflict of interest

Rationale: Potential localisation practitioners must facilitate institutional development, but they may not all be in a position to afford experts to help them develop and enforce the required policies. Therefore, standard policies subject to review and endorsement by their boards may be developed and uploaded to the LD's website. These policies may be used as the basis for capacity exchanges, as discussed under Roadmap Output 1.

Activity 11.6: Hiring local experts

Procure local consultancies.

Rationale: The localisation initiative will require the involvement of many local experts. Professionalism and non-bias will be critical in the search for experts, assessment of profiles, contracting and quality control. For smaller organizations with limited ability to undertake recruitment and procurement, the LD can be of assistance.

Activity 11.7: Hiring international experts

Support international actors in the procurement of international consultancies.

Rationale: Localisation will at times require the involvement of international consultants to supplement local experts where necessary. The LD may identify areas of need and recommend potential experts from within the database to international actors seeking to hire international consultants. The LD can also provide services related to the development of TOR, quality control and local administrative and logistical support.

Activity 11.8: Local actors' code of conduct

Develop a code of conduct for local actors regarding recruitment and compensation, disseminate it, and follow-up.

Rationale: Standardising position levels, recruitment processes, and salary amounts based on a required skillset will prevent poaching of staff members using a differentiated salary structure for similar functions. This will lessen unnecessary competition within the same set of human resources.

Activity 11.9: International actors' code of conduct

Develop a code of conduct for international experts regarding recruitment and compensation.

Rationale: As in the case of hiring local experts, a code of conduct for international actors may help to avoid unhealthy competition for experts and ensure reasonable remuneration.

Activity 11.10: Inception workshops

Hold inception workshops with stakeholders to communicate about the *Localisation Roadmap* and seek support at the policy and operational levels.

Rationale: These workshops will create a broad base of understanding about localisation and establish a support base to drive progress at the policy and operational levels. This will also help to mitigate obstacles and overcome barriers.

PART III: Monitoring, Review and Reporting

* Please note that this section will be completed during the inception phase.

The LD will follow a results-based monitoring (RBM) system in documenting the progress, assessing potential changes to achieve the outputs, outcomes and impacts and report to its constituents (figure 17). It will use a monitoring framework (see Figure 17) for all outputs, outcomes and impacts. The monitoring and learning cell of LD, supported by the research team, will assist in implementing the RBM system. The LD will develop a detailed framework for RBM during the inception phase, after the indicators with baseline data are gathered and the targets are defined. The LD will use software to process the monitoring data within an acceptable timeframe.
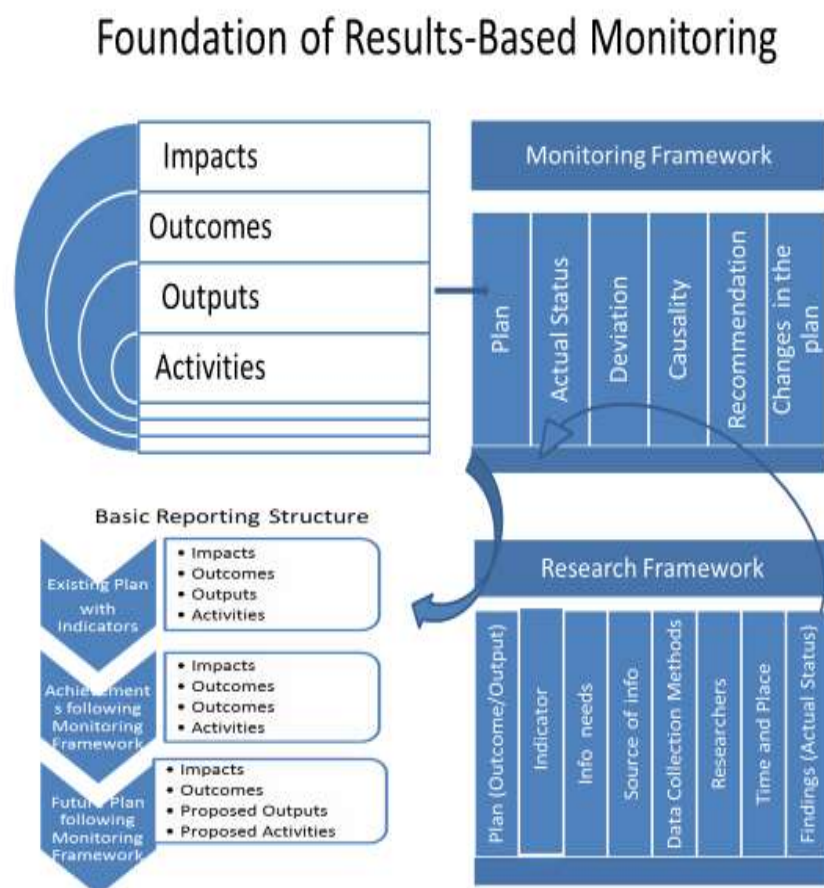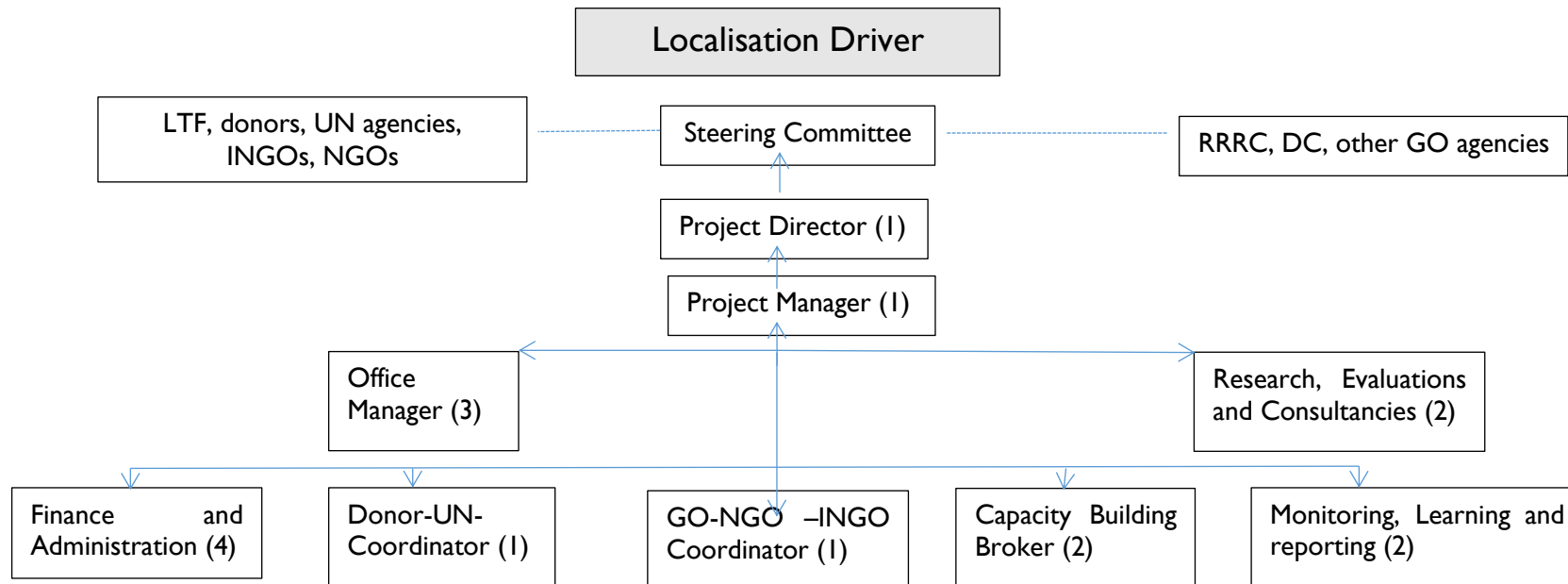

Figure 17: Integral elements of a results-based monitoring system

Structure of the Localisation Driver

As the facilitator of the change management process, the LD is expected to possess a strong mandate recognised by the government and donors. It can also be understood as a project of the government anchored with the cabinet division, and with at least one additional secretary of the government as project director. This will allow access to all stakeholders and establish the LD's authority to demand implementation of action plans developed by each stakeholder. Since the cabinet division does not possess any district-level implementing organ, it may outsource the services of a specialised third party, which would provide a project manager based in Cox's Bazar.

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                        ┌─────────────────────────┐
                        │   Localisation Driver   │
                        └─────────────────────────┘

┌──────────────────────┐     ┌───────────────────────┐     ┌─────────────────────────┐
│ LTF, donors, UN      │- - -│  Steering Committee   │- - -│ RRRC, DC, other GO      │
│ agencies, INGOs, NGOs│     └───────────────────────┘     │ agencies                │
└──────────────────────┘                                   └─────────────────────────┘

                             ┌───────────────────────┐
                             │  Project Director (1)  │
                             └───────────────────────┘

                             ┌───────────────────────┐
                             │  Project Manager (1)   │
                             └───────────────────────┘

        ┌──────────────┐                                  ┌─────────────────────┐
        │ Office       │                                  │ Research, Evaluations│
        │ Manager (3)  │                                  │ and Consultancies (2)│
        └──────────────┘                                  └─────────────────────┘

┌──────────────┐ ┌──────────────┐ ┌──────────────┐ ┌──────────────┐ ┌──────────────────┐
│ Finance and  │ │ Donor-UN-    │ │ GO-NGO –INGO │ │ Capacity     │ │ Monitoring,      │
│ Administration│ │ Coordinator  │ │ Coordinator  │ │ Building     │ │ Learning and     │
│ (4)          │ │ (1)          │ │ (1)          │ │ Broker (2)   │ │ reporting (2)    │
└──────────────┘ └──────────────┘ └──────────────┘ └──────────────┘ └──────────────────┘
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PART IV: Implementation Schedule, Responsibilities and Partnerships

Roadmap Output 1: Local actors demonstrate enhanced capacities in the areas of:
a) programme management
b) institution building
c) sectoral technical knowhow unique in humanitarian assistance
d) protection and gender issues, in order to serve the needs of refugees.

	Activities	Indicator/Target	Target				Implementer	Partnership
			M6	Y1	Y2	Y3		
1.1	Provide need-based and demand-driven basic and advanced training in various areas, using Bangla as medium of communication.	Two basic 5-day trainings for 40 participants held in all areas in Bangla. One advanced 3-day training for 20 participants for all areas.	▓	▓			Localisation Driver	National NGOs, Consultants
1.2	Provide long-term training of trainers (TOT) to develop a team of certified local resource personnel to address the ongoing consultancy needs of local actors, including internal policy, management, thematic and operational activities.	One 5-day TOT in each area for 10 participants.		▓			Localisation Driver	National NGOs, Consultants
1.3	Organise workshops and refresher trainings to continuously update actors' knowledge and skills.	Two 3-day workshops or refresher trainings for 40 participants for all listed areas in Bangla.		▓			Localisation Driver	National NGOs, Consultants
1.4	Introduce an online self-learning portal for local actors to self-assess and learn continuously.	Relevant staff members of the local actors visit the portal, participate in tests and ask questions.	▓	▓	▓	▓	Localisation Driver	IT Consultants

Roadmap Output 2: Rohingya self-help groups (SHGs) are conversant with the humanitarian principles, group management and respective areas of sectoral and technical engagement and are willing to collaborate with camp-based service providers (local actors) in various areas.

	Activities	Indicator/Target	Target				Implementer	Partnership
			M6	Y1	Y2	Y3		
2.1	Organise workshops to motivate Rohingya refugees, particularly youth and technical experts, to form SHGs in their areas of interest.	One workshop held in each camp. X number SHGs (with 5 members) in 10 preferred areas are formed.	✓				Cox's Bazar-based NGOs/CBOs	CiC
2.2	Conduct a survey among the refugees to create a human resource inventory, differentiated according to various skill areas.	A list of camp-wise Rohingya recognized experts is available.	✓				Cox's Bazar-based NGOs	CiC
2.3	Provide training to SHGs on group management, group leadership, humanitarian principles and need-based specific sectoral skills, e.g., education using the Myanmar syllabus and language.	Two trainings for 10 SHGs (25 participants per training) are held.	✓				Cox's Bazar-based NGOs	National NGOs, CiC
2.4	Seek government approval to operate the SHGs in the camps as a complement to the implementation of humanitarian assistance.	A letter from RRRC allowing formation of SHGs in camps.	✓	✓	✓	✓	Cox's Bazar-based NGOs	RRRC, District Admin, NGOAB
2.5	Introduce mobile online self-learning portals for continuous learning and experience sharing through the SHGs.	SHG members download information, share experiences with each other and ask questions.	✓	✓	✓	✓	Cox's Bazar-based NGOs	IT Consultants
2.6	Organise a quarterly SHG coordination meeting.	One quarterly meeting of SHGs is held.	✓	✓	✓	✓	Cox's Bazar-based NGOs	CiC

	Roadmap Output 3: Donors, UN agencies and INGOs operate innovative funding mechanisms, e.g., pooled funds, direct funding and network funding, to engage capable and competitive local actors as partners. This addresses the needs of both the Rohingya refugees and host communities, as well as the capacity exchange needs of the local actors and the Rohingya SHGs in a systematic manner.							
	Activities	Indicator/Target	Target				Implementer	Partnership
			M6	Y1	Y2	Y3		
3.1	Develop standardised guidelines, operational and compliance procedures for innovative funding tools (call for proposals, assessment system and rewards modality) by donors, UN and INGOs.	Donors, UN agencies and INGOs have uploaded call for proposals with clarity on proposal framework, assessment system and rewards modality.					Funding Agencies	Localisation Driver, Consultants
3.2	Provide a workshop for local actors (national and Cox's Bazar-based NGOs) in Bangla or English on online bidding procedures.	At least one representative from the local actors has participated.					Localisation Driver	Funding Agencies, Consultants
3.3	Encourage local actors to enlist in a database online, differentiated according to geographical focus and profile including area of expertise, OD, program management capacity and awareness about humanitarian principles, and update their profile regularly.	The profile of the local actors is downloadable.					Localisation Driver	Funding Agencies, IT Consultants

Roadmap Output 4: All refugee camps are managed following the humanitarian principles, policies, division of labour and guidelines jointly developed by the government and other actors (Cox's Bazar-based NGOs, CBOs/CSOs, SHGs, national NGOs, INGOs and UN agencies).

	Activities	Indicator/Target	Target M6	Target Y1	Target Y2	Target Y3	Implementer	Partnership
4.1	Draw a 3-year rolling plan to maintain physical, social and institutional infrastructure. Standard guidelines must be followed, developed in consultation with local and international actors as well as credible representatives of the Rohingya communities.	Every camp possesses a 3-year rolling plan.	■				RRRC	Localisation Driver
4.2	Seek the services of LD to find suitable local actors from the available applicants and international actors where necessary to maintain the services at the camp level.	A protocol exists for the selection of the actors detailing the decision-making criteria and process.	■	■	■	■	RRRC	Localisation Driver
4.3	Allow the chosen local actors to facilitate the formation of Rohingya SHGs in various technical areas to service the refugees.	SHGs exist in 10 subject areas according to the priority of the refugees.	■	■			Cox's Bazar-based NGOs	CiC
4.4	Establish and maintain an informal conflict resolution system for intra-Rohingya and Rohingya-host community conflicts, in consultation with the parties.	Two conflict resolution committees involving recognised representatives exist, one for intra-Rohingya conflicts and the other for conflicts between host communities and Rohingya communities.	■	■	■	■	CiC	LGRs
4.5	Communicate government policies on living in the camp and repatriation.	The refugees can describe the refugee-related government policies.	■	■	■	■	CiC	Cox's Bazar-based NGOs
4.6	Prepare and disseminate a monthly camp report to the stakeholders using a standard template.	Standardised camp-wise monthly camp reports are available with RRRC.	■	■	■	■	CiC	Localisation Driver
4.7	Provide support to the localisation drivers and international actors during guest visits.	Back to the office reports of the LD and international actors record compliance of the agreed schedule and support.	■	■	■	■	CiC	Localisation Driver
4.8	Monitor the activities of the organisations operating in the camps with respect to their action plans and share observations in weekly meetings.	Weekly meetings on the progress of the implementation of the action plan are held.	■	■	■	■	CiC	Localisation Driver
4.9	Introduce tri-lingual communication system, using Bangla as the base.	Camp records are available both in Bangla and English, but communications with the refugees are also conducted in Burmese language.	■	■	■	■	CiC	Localisation Driver, Cox's Bazar-based NGOs

Roadmap Output 5: The host communities have access to preferred status in suitable employment, as suppliers of agricultural goods for the refugees (local procurements), sustainable household energy system and community assets (e.g., roads) and institutions (e.g., community clinics, schools).

	Activities	Indicator/Target	Target M6	Y1	Y2	Y3	Implementer	Partnership
5.1	Develop and introduce a common recruitment policy to engage local people in the Rohingya humanitarian response associated with capacity building and continuous education.	The recruitment policy is available as a guideline for the local and international actors.					Localisation Driver	Local Actors
5.2	Introduce a farming system or crop diversification model for profitable farming using the services of the Department of Agricultural Extension.	100 farmers in Cox's Bazar have received training with test plots on crop diversification.					Upazila-Based Dept. of Agricultural Extension	LGRS, Cox'sBazar-based NGOs
5.3	Encourage the private sector and farmers to participate in the supply chain by delivering products to the Rohingya refugees associated with capacity building for bidding.	100 farmers/traders have received training on how to participate in the procurement.					CiC	Funding Agencies, Localisation Driver
5.4	Support the development of host community infrastructure as prioritised by the community.	The local actors including the government have implemented a list of projects prioritized by the host communities.					Upazila-Based Government Line Agencies	RRRC, Local Administration

Roadmap Output 6: Host communities, represented by local government representatives, are included in decision-making, are sensitive about the plight of the refugees and the necessity for expected humanitarian attitude towards them, and have a conflict resolution system in place.								
	Activities	Indicator/Target	Target				Implementer	Partnership
			M6	Y1	Y2	Y3		
6.1	Organise regular ward-wise community meetings with the involvement of local government representatives (LGRs) on the various aspects of the Rohingya humanitarian response, GoB's policy and roles arising for the communities.	1 meeting is held per month.					Cox's Bazar-based NGOs	CiC
6.2	Support regular meetings between the LGRs and representatives of the Rohingya communities to discuss issues of mutual interest.	1 meeting is held per month.					Cox's Bazar-based NGOs	CiC, LGRs, SHG
6.3	Establish a conflict resolution system by engaging the LGRs, representatives of Rohingya communications and camp administration to address potential conflicts.	A conflict resolution committee exists per camp with LGRs, CiC and one representative from SHGs.					Cox's Bazar-based NGOs	CiCs, LGRs

Roadmap Output 7: Government agencies (RRRC, NGO affairs bureau and local administration) and local government administration are supportive to localisation initiatives and seek accountability from local and international service providers.

	Activities	Indicator/Target	Target				Implementer	Partnership
			M6	Y1	Y2	Y3		
7.1	Advocate for a special window at NGOAB to accelerate processing of proposals related to Rohingya humanitarian response, streamlined through an online application portal.	NGOAB receives online proposals through a special window.	■				Localisation Driver	RRRC, NGOAB
7.2	Organise workshops with NGO-engaging public officials as resource persons to clarify regulatory requirements for project proposals.	One workshop is held with 30 participants from CB-based NGOs	■				Localisation Driver	RRRC, NGOAB, CB-NGOs
7.3	Report to the CiCs, local administration, local government representatives and the community on the progress of activity implementation for the Rohingya and host communities on a regular basis.	Quarterly reports/presentations are available with the local administration, CiC and local communities.	■	■	■	■	Local Actors	RRRC, Local Admin, LGRs
7.4	Seek the support of local administration and local government representatives to resolve potential conflicts between host and guest communities.	LGRs have participated in all conflict resolution initiatives.	■	■	■	■	Local Actors	CiC, LGRs

Roadmap Output 8: Local and international actors engaged in the humanitarian assistance have access to advanced knowledge and skills in the area of humanitarian assistance, IT-driven management systems, and functional areas.

	Activities	Indicator/Target	Target				Implementer	Partnership
			M6	Y1	Y2	Y3		
8.1	Prepare a database of national and international experts in the areas of demand by local actors.	The database is accessible to all actors.					Localisation Driver	International Actors
8.2	Procure international consulting services and undertake quality control.	LD has prepared TOR and commented on the reports of international consultants.					Funding Agencies	Localisation Driver
8.3	Develop joint response plan in collaboration with localisation driver.	LD has participated in the development of a joint response plan.					International Actors	Localisation Driver, RRRC, NGOs
8.4	Undertake fundraising at the international level.	LD has participated in the fundraising campaign.					RRRC	Funding Agencies, International Actors
8.5	Manage international visitors in cooperation with LD.	LD has accompanied international visitors in CB.					International Actors	Localisation Driver
8.6	Identify complementary areas between local and international actors, seeking short-term roles for international experts.	A list of services needing short-term international consultants is available.					International Actors	Localisation Driver

Roadmap Output 9: All participating agencies engaged in the Rohingya humanitarian response practice an effective communication system in Rohingya, Bangla and English. Communications are equally understandable to the Rohingya refugees, GoB, LG, host communities and relevant international actors.								

	Activities	Indicator/Target	Target				Implementer	Partnership
			M6	Y1	Y2	Y3		
9.1	Develop a tri-language communication system to be used where relevant, i.e., use exclusively Rohingya or Burmese language in education, training and other communications with the refugees.	A policy is available detailing when and which documents and materials will be required in Bangla, English and Burmese language.	■				Localisation Driver	CiC, RRRC, CB-NGOs
9.2	Develop a group of certified translators and interpreters for communication with the Rohingya refugees.	A list of certified bilingual translators and interpreters for Bangla-Burmese and Burmese-English is available, along with rates for engagement.	■				Localisation Driver	CiC, SHGs
9.3	Ensure translation of all meeting minutes in Bangla and English.	All meeting minutes involving Rohingya humanitarian assistance are available in Bangla and English.	■	■	■	■	Localisation Driver	RRRC, International Actors, NGOs

Roadmap Output 10: Bangladesh shares its internal learning from localisation with core stakeholders and has access to external learning and policy dialogues at the national and international level.

	Activities	Indicator/Target	Target				Implementer	Partnership
			M6	Y1	Y2	Y3		
10.1	Publish half-yearly reports online highlighting lessons learnt.	All stakeholders have received the lessons learnt reports.					Localisation Driver	RRRC, Local Administration, CB-NGOs, Funding Agencies
10.2	Maintain contact and exchange information with agencies in other jurisdictions that have the same agenda.	Reports from other jurisdictions and contacts are available through the LD.					Localisation Driver	International Actors, Funding Agencies
10.3	Support networks, alliances and coalition activities of NGOs participating in the localisation and organising seminars and workshops related to Rohingya refugee interventions.	NGO networks, alliances and coalitions have implemented at least one activity leading to recommendations supported by the LD.					Funding Agencies	Local Actors, Localisation Driver
10.4	Participate in regional and international policy dialogue on localisation.	At least two members of the NGO alliance, coalition or network are part of the delegation in any national or international policy dialogue on localisation.					RRRC, Local Actors, International Actors	Localisation Driver
10.5	Undertake studies on localisation practices.	At least two demand-driven longitudinal evaluative and descriptive studies are conducted on localisation per year.					Localisation Driver	Local Actors, International Actors

Roadmap Output 11: A Localisation Driver (LD) based in Cox's Bazar and accountable to government and donors with suitable organizational set-up, TOR, policies and resources is available to facilitate the localisation process amongst all stakeholders.							
	Activities	Indicator/Target	Target				Implementer	Partnership
			M6	Y1	Y2	Y3		
11.1	Select a suitable third-party agency as the LD, which must meet a set of skill requirements.	GOB and donors have agreed upon the institutional shape of the LD, either as a separate entity or anchored with an organization.	✓				Ministry of Disaster Preparedness	Funding Agencies
11.2	Provide a TOR to facilitate the implementation of all outputs.	All parties have agreed upon TOR of LD.	✓				Ministry of Disaster Preparedness	Funding Agencies
11.3	Equip the office of the LD in Cox's Bazar with human resources, policies and procedures, materials and equipment.	LD's office has been inaugurated.	✓				Relevant Ministry	Funding Agencies
11.4	Develop standardised tools and templates for a) call for proposals, i.e., concept note, detailed proposal, b) reporting formats and c) monitoring and evaluation frameworks, in consultation with international actors.	Standardised tools and templates for proposals, reports and monitoring are downloadable from LD's website.	✓				Localisation Drivers	Funding Agencies
11.5	Develop and upload standard policies to the website for effective organization management.	Guidelines on standard policies are downloadable from LD's website.	✓	✓			Localisation Driver	International Actors
11.6	Procure local consultancies.	Local and international actors receive a list of potential consultants.	✓	✓	✓	✓	Localisation Driver	RRRC, Intern Actors
11.7	Support international actors in the procurement of international consultancies.	International actors, upon request, receive a list of potential consultants along with agreed code of conduct, possible rates and the process of engagement, from contracting to reporting.	✓	✓	✓	✓	Localisation Driver	International Actors
11.8	Develop a code of conduct for local actors regarding recruitment and compensation, then disseminate and follow-up.	Agreed code of conduct is downloadable from LD's website.	✓				Localisation Driver	Local Actors
11.9	Develop a code of conduct for international experts regarding recruitment and compensation.	Agreed code of conduct is downloadable from LD's website.	✓				International Actors	Localisation Driver
11.10	Hold inception workshops with the stakeholders to communicate the roadmap and seek support on a policy and operational level.	One workshop has been held in CB with the participation of potential international and local actors, including RRRC and CiCs.	✓				Localisation Driver	RRRC, Local Actors

Annexures

Annex-1: Desk Review of Key Frameworks and Documents

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Localisation Roadmap for Humanitarian Response in Cox's Bazar

Desk Review of Key Frameworks and Documents

Overview

Since 25 August 2017, extreme violence in Rakhine State, Myanmar, has driven over 730,000 Rohingya refugees across the border into Cox's Bazar, Bangladesh. The Government of Bangladesh welcomed the Rohingya refugees with generosity and open borders. The speed and scale of the influx was nonetheless a challenge. Today there are more than 900,000 Rohingya refugees (approximately 200,000 families) living in Cox's Bazar. Multiple actors have been involved in the crisis response, including the Government of Bangladesh, host communities, multilateral and bilateral development partners, the United Nations, international and national non-government organizations (INGOs and NNGOs), and the private sector, amongst others.

As the crisis becomes protracted, there is recognition that a strategy is needed to ensure greater localisation of the humanitarian response. This desk review provides an overview of key frameworks, debate and discourse around localisation, materials specific to the Cox's Bazar context, and a review of key steps and decisions taken thus far, particularly by the Localisation Task Force.

The desk review was conducted by Centre for Peace and Justice, Brac University, as a preliminary step toward the drafting of a localisation roadmap. The findings described in this report will be considered and referred to throughout the drafting process. They are summarized within the following categories:

1. **Key frameworks:** The desk review provides an overview of key frameworks underpinning the recent global shift toward localisation, and a description of how the guiding principles around localisation have evolved.

2. **Discourse and debate:** A summary of common disagreements, sensitivities, and considerations around localisation has been included to shed light on issues that may arise between stakeholders throughout the Cox's Bazar localisation process.

3. **Sources of guidance on implementation:** The desk research team conducted a study of key academic, theoretical and policy literature on localisation; the findings of that study are contained in this section. A number of prominent reports and other documents were reviewed which provide an overview of general lessons learned, opportunities and challenges in the process of localising humanitarian responses.

4. **Cox's Bazar preliminary localisation strategy:** Finally, reports, advocacy briefs, and recommendations from localisation researchers and actors addressing the Cox's Bazar context were reviewed. The desk research team reviewed existing plans, decisions and agreements enacted by the LTF and other key stakeholders in Bangladesh.

5. **Conclusions and gap analysis:** This section summarizes the desk review findings and identifies specific gaps in regard to research undertaken on localisation in the Cox's Bazar context thus far.

The roadmap formulation activities to be undertaken by CPJ, for which the findings of this desk review may be relevant and referred to, include: stakeholder mapping (global, national and local), a SWOT analysis, consultation meetings and interviews, identifying practical and ethical considerations, and developing validation processes and quality control mechanisms.

The very nature of localisation indicates that the strategy undertaken for the Rohingya crisis will be unique and distinct from other contexts. Thus, this desk review is intended to highlight various factors for consideration rather than to provide specific recommendations for the roadmap, which will depend largely on inputs from key local stakeholders.

Key frameworks

Over the past 15 years, a sector-wide conversation about the need for aid reform has transpired in recognition of the fact that as global crises are mounting, funding is increasingly stretched. Localisation – the increased allocation of aid to local responders - has been recognised as one of a number of strategies to make aid more effective and efficient. Yet localisation is seen by proponents as having intrinsic value beyond its strategic applications: it presents an opportunity to reset power imbalances that tend to play out in international development politics by centring the voices and leadership of local actors.

The following section provides an overview of the history and frameworks that have been enacted as a result of these conversations, including common standards for localisation.

The Global Humanitarian Platform

The Global Humanitarian Platform (GHP) is seen as one of the first global initiatives that addressed the lack of efficiency and effectiveness in aid. It was launched in 2006, with global meetings convened amongst INGOs, the UN and Red Cross/Red Crescent societies in 2007, 2008, and 2010.[3] The GHP recognized the role commonly played by local and national organizations as first responders in humanitarian emergencies, and the fact that these actors usually possess the most detailed knowledge of local realities. The GHP also signified a shift toward greater openness and collaboration amongst key agencies, with the UN recognizing the significance and relative advantages of INGOs and Red Cross/ Red Crescent societies to respond to emergencies.[4]

The rhetoric, debates and issues identified during the GHP's lifespan can be understood as setting precedents that influenced the current relevant frameworks for localisation and other measures to reform humanitarian finance. The GHP partners also developed a statement of commitment to make improvements in partnerships and coordination. This set of improvements is known as the Principles of Partnership (PoPs), which include equality, transparency, results-oriented approach, responsibility and complementarity.[5]

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[3] International Council of Voluntary Agencies, Global Humanitarian Platform: An Overview.
https://www.icvanetwork.org/global-humanitarian-platform-ghp-overview
[4] International Council of Voluntary Agencies.
[5] International Council of Voluntary Agencies. Principles of Partnership: A Statement of Commitment.
https://www.icvanetwork.org/principles-partnership-statement-commitment

The Charter 4 Change[6]

The PoPs established by the GHP continue to be referenced by localisation and humanitarian reform advocates. They are reiterated in the Charter 4 Change (C4C), launched in July 2015, which specifically called for the following commitments to be implemented by May 2018:

1. INGOs to pass at least 20 percent of their humanitarian funding to national NGOs
2. Funders to publish the amount/percentage of funding passed to national NGOs
3. Reaffirm principles of partnership introduced by the Global Humanitarian Platform in 2007: equality, transparency, results-oriented approach, responsibility and complementarity
4. Address and prevent negative impacts of recruiting national NGO staff during emergencies
5. Address subcontracting and ensure equality in decision-making
6. Emphasise the importance of national actors to donors
7. Provide robust organisational support and capacity building
8. Promote the role of local actors to media and the public [7]

Although implementation has been patchy, the C4C remains relevant and continues to be used as a key guiding document informing action on localisation. It is now endorsed by over 286 organisations worldwide, including 34 leading INGOs.[8]

Recommendations of the High-Level Panel on Humanitarian Financing

Following the C4C, the next cornerstone placed toward a global shift in aid practices was laid in a January 2016 report by the High-Level Panel on Humanitarian Financing commissioned by the UN Secretary General. Entitled 'Too important to fail—addressing the humanitarian financing gap', the report was one of the first high-level calls for a 'Grand Bargain' to improve efficiency in service delivery.[9] The report recognized the need to stretch limited aid resources in order to address the needs of a world confronting escalating natural disasters and protracted societal crises; the authors envisioned the future of aid as more transparent, effective, efficient, and flexible.[10] A Grand Bargain would be a formal agreement under which agencies would unite around these goals:

> The elements of a Grand Bargain include provision of more cash-based assistance, where appropriate, and recognition of the comparative advantages of local, national and international implementing organisations for delivery of services. To improve response time the panel suggests the creation of a repository of pre-qualified organisations to dispense with repeated screening of NGOs, as well as more work on strengthening local capacity.[11]

The report also called on agencies to commit to the points laid out in the 8-point Charter 4 Change.

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6   www.charter4change.org

7 International Council of Voluntary Agencies.

8 For a complete summary and annual reports covering the Charter for Change, see Agenda for Humanity's webpage, Charter for Change Summary: https://www.agendaforhumanity.org/initiatives/3859

9 For more information about the inception of the Grand Bargain, see the Inter-Agency Standing Committee webpage, "About the Grand Bargain." https://interagencystandingcommittee.org/about-grand-bargain

10 High-Level Panel on Humanitarian Financing commissioned by the UN Secretary General. Too important to fail—addressing the humanitarian financing gap. January 2016. https://reliefweb.int/sites/reliefweb.int/files/resources/%5BHLP%20Report%5D%20Too%20important%20to%20fail%E2%80%94addressing%20the%20humanitarian%20financing%20gap.pdf

11 High-Level Panel, pp. vi-vii.

Whereas the Charter 4 Change was a specific call by NNGOs for greater action toward localisation by INGOs, the Grand Bargain situates these localisation goals within a broader framework for more efficient and effective aid financing. Following the publication of the High-Panel report, the Grand Bargain was drafted as an output of the World Humanitarian Summit, a major event convened under the leadership of UN Secretary-General Ban Ki-moon and held in Istanbul in May 2016. The fact that so many agencies agreed on the Grand Bargain in a short span of time was seen by some observers as a major achievement of the summit, though others criticized it for failing to produce a binding agreement.[12]

An online platform for the Grand Bargain is currently hosted by the Inter-Agency Standing Committee (IASC) and signatories are invited to participate in annual self-reporting exercises to provide updates on their progress toward C4C and Grand Bargain goals.[13] The Grand Bargain (GB) is comprised of 51 commitments categorized under nine workstreams:

1. **Greater Transparency:** The guidelines set forth in the International Aid Transparency Initiative (IATI) are considered as a common standard.[14]

2. **More support and funding tools to local and national responders:** (See detailed description below.) This workstream is the key element of the Grand Bargain's localisation commitments. Signatories of the GB are 'committed to making principled humanitarian action as local as possible and as international as necessary, recognizing that international humanitarian actors play a vital role particularly in situations of armed conflict'.[15]
   The GB establishes that 25 percent of humanitarian funding should be allocated to local and national responders by 2020. The GB also distinguishes local from national responders, as these may be different in many contexts.

3. **Increase the use and coordination of cash-based programming:** Though under-utilized, cash gives beneficiaries a greater range of options and empowerment; cash-based interventions also strengthen local markets.

4. **Reduce Duplication and Management costs with periodic functional reviews:** This entails reducing and streamlining reporting and oversight requirements.

5. **Improve Joint and Impartial Needs Assessments:** Humanitarian actors will establish common methodologies, coordinate closely and share data to avoid wasteful duplication of needs assessments during crises.

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[12] Wikipedia. World Humanitarian Summit. https://en.wikipedia.org/wiki/World_Humanitarian_Summit#cite_note-42
[13] IASC maintains a website with Grand Bargain information, news, events and repository of signatories' self-reported data and updates. See https://interagencystandingcommittee.org/node/37358. One example of self-reporting is UK Department for International Development, 2018 Grand Bargain Annual Self-Reporting.

[14] See www.iatistandard.org for more information.
[15] Inter-Agency Standing Committee. More support and funding tools for local and national responders: https://interagencystandingcommittee.org/more-support-and-funding-tools-local-and-national-responders

6. **A Participation Revolution - Include people receiving aid in making the decisions which affect their lives:** This commitment specifically emphasizes the need for conflict-affected populations to be included in decision-making around aid. The term 'revolution' is used in recognition of the need to overcome a deeply entrenched legacy of exclusion of beneficiaries themselves as key stakeholders. A successful Participation Revolution would enfranchise both refugee and host communities.

7. **Increase collaborative humanitarian multi-year planning and funding:** Longer funding timelines reduce administrative burdens and overhead costs.

8. **Reduce the earmarking of donor contributions:** Donors will entrust implementing agencies to set priorities; this enables a swifter response in emergencies and can make space for decision-making and coordination decision-making amongst key and local stakeholders.

9. **Harmonize and simplify reporting requirements:** Aid agencies and donors agree to reduce the volume of required reporting and enhance the quality to ensure the better capture of results. [16]

Grand Bargain Workstream 2: Localisation in detail

Workstream 2 is the key component of the Grand Bargain that establishes a localisation agenda, though each of the workstreams has implications for localisation, with Workstreams 6 and 8 also particularly relevant.

Six of the 51 total commitments fall under Workstream 2, as follows:

Aid organisations and donors commit to:

1. **Multi-year funding, partnerships, and capacity strengthening:** 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. We should achieve this through collaboration with development partners and incorporate capacity strengthening in partnership agreements.

2. **Reduce barriers:** Understand better and work to remove or reduce barriers that prevent organisations and donors from partnering with local and national responders in order to lessen their administrative burden.

3. **Strengthen coordination:** Support and complement national coordination mechanisms where they exist and include local and national responders in

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[16] See https://interagencystandingcommittee.org/grand-bargain-0 for thorough descriptions of each of the nine commitments. An initial tenth commitment, Enhance engagement between humanitarian and development actors, has since been integrated and mainstreamed as a cross-cutting theme across all other commitments.

international coordination mechanisms as appropriate and in keeping with humanitarian principles.

4. **Targeted funding:** Achieve by 2020 a global, aggregated target of at least 25 percent of humanitarian funding to local and national responders as directly as possible to improve outcomes for affected people and reduce transactional costs.

5. **Track funding:** Develop, with the Inter-Agency Standing Committee (IASC), and apply a 'localisation' marker to measure direct and indirect funding to local and national responders.

6. **Pool funds to increase accessibility:** Make greater use of funding tools which increase and improve assistance delivered by local and national responders, such as UN-led country-based pooled funds (CBPF), IFRC Disaster Relief Emergency Fund (DREF) and NGO- led and other pooled funds.[17]

Measuring progress toward commitments

Annual reports for both the C4C and Grand Bargain note that progress has been made toward the commitments laid out in each, albeit in inconsistent ways and not as swiftly as hoped. An independent report was commissioned by the European Commission in 2017 to assess the early implementation of Grand Bargain commitments by signatories. The authors note the growing sense of impatience amongst some stakeholders who sense that the Grand Bargain has yet to live up to its potential as a true game-changer that significantly transforms the humanitarian financing landscape.[18]

A 2019 independent annual report on the Grand Bargain by Overseas Development Institute (ODI) noted that many signatories had made significant progress toward the 51 commitments and utilized the Grand Bargain to develop institutional practice, strategy and policy. They found that, along with Workstream 3 (cash-based interventions), Workstream 2 had performed particularly well since 2018, with substantial progress made towards actioning the commitments.[19] The authors note that more time is needed and more investments required to ensure that the Grand Bargain fulfils its potential.[20]

Establishing indicators, measuring progress

A 2018 report by Koenraad von Brabant and Smruti Patel of Global Mentoring Initiative, 'Localisation in Practice: Emerging Indicators and Practical Recommendations', offers a set of recommendations to help guide localisation processes.[21] Noting that awareness and clarity around localisation remains incomplete within INGOs and the broader humanitarian community, clear practical guidance, a monitoring mechanism, and awareness-raising materials are needed to support decision-makers. Von Brabant and Patel also note that a distinction must be drawn between local and national responders, and that ongoing efforts are needed to map and support local capacities. They also note the remaining need to develop clearer indicators for measuring progress.

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[17] IASC. More support and funding tools for local and national responders. https://interagencystandingcommittee.org/more-support-and-funding-tools-local-and-national-responders
[18] Independent Grand Bargain Report. Global Public Policy Institute and Inspire Consortium. https://interagencystandingcommittee.org/system/files/nn_-_grand_bargain_report_final.pdf
[19] Humanitarian Policy Group of Overseas Development Institute. Grand Bargain annual independent report 2019. June 2019, p. 4. https://www.odi.org/sites/odi.org.uk/files/resource-documents/12735.pdf
[20] Humanitarian Policy Group, p. 6.
[21] Global Mentoring Initiative, Localisation in Practice: Emerging Indicators and Practical Recommendations, June 2018.

Humanitarian Advisory Group's report 'Measuring Localisation: Framework and Tools', published in partnership with Pacific Islands Association of Non-Governmental Organizations presents seven categories and corresponding indicators, helps address the need for clear indicators as identified by GMI.[22] These are as follows:

1. Partnerships: Equitable and complementary partnership between local, national and international actors
2. Leadership: National actors define and lead on humanitarian action
3. Coordination and complementarity: Application of and respect for commonly agreed approaches to 'as local as possible and as international as neccesary'
4. Participation: Communities lead and participate in humanitarian response
5. Policy influence and advocacy: Humanitarian action reflects the priorities of affected communities and national actors
6. Capacity: Local and national organisations are able to respond effectively and efficiently, and have targeted and relevant support from international actors
7. Funding: Increased number of national and local organisations describing financial independence that allows them to respond more effectively[23]

Humanitarian Advisory Group also offers a set of progress indicators and means of verifications for each impact indicator; those developing a localisation strategy in their own context are advised to adapt and agree on their own common set of progress indicators for use by all stakeholders. A sample survey is provided as a starting point to establish baselines and track changes.

Finally, the Localisation Performance Management Framework developed by NEAR, a movement of global south civil society organisations, to support practical approaches and strengthen the evidence base for localisation.[24] The adaptable framework is targeted for use by local and national NGOs but also relevant for international actors. One of the key questions presented is, 'To what extent and in what ways has localisation contributed to changes (positive or negative) in the effectiveness of our humanitarian response'?[25] A set of key performance indicators (KPIs), means of verification, measurement strategies, and tools for benchmarking performance and action planning are expounded for various aspects of localisation. KPIs proposed by NEAR are segregated according to the seven main components of localisation:

1. Partnerships: quality of relationships, a shift from project-based to strategic partnerships, quality of engagement of partners throughout the project cycle
2. Funding: Quantity and quality of funding, access to direct funding, financial management and risk mitigation
3. Capacity: Performance management, organisational development, quality standards, recruitment and surge
4. Coordination and complementarity: Humanitarian leadership and coordination, collaborative and complementary response
5. Policy, influence and visibility: Influence in policy, advocacy and standard-setting, visibility in reporting and communications

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[22] Humanitarian Advisory Group and Pacific Islands Association of Non-Governmental Organizations, Measuring Localization: Framework and Tools, December 2019.

[23] Humanitarian Advisory Group, pp. 4-5.

[24] NEAR, Localisation Performance Management Framework, 2019.
http://www.near.ngo/framework/pdf/LMPF%20Final_2019.pdf

[25] NEAR, p. 3

6. Participation: Participation of affected people in humanitarian response, engagement of affected people in humanitarian policy development and standard-setting[26]

Discourse and debate

Beyond the policy and measurement frameworks reviewed in the preceding section, the literature on localisation covers a wide-ranging debate that has taken place in the humanitarian community throughout the past decade. This section reviews disagreements, questions and stumbling blocks that may arise as the roadmap in Cox's Bazar unfolds.

Balancing power dynamics beyond efficacy and efficiency

When considered strictly in light of the Grand Bargain's twin goals of improving efficiency (in terms of cost-effectiveness) and efficacy (in terms of improved outcomes for affected populations), localisation and the other Grand Bargain workstreams are justified to the extent that they contribute to this overarching goal. Yet the argument in favour of localisation transcends its direct effect on efficiency and efficacy. A Global Mentoring Initiative white paper, 'Why Localisation', lists the ways in which localisation addresses broader critiques around the political economy of aid.[27] These include excessive centralisation, unsustainability of current financing models, slowness of international aid machinery, and the oft short-term presence of international actors. International aid is described as too paternalistic and politically unsustainable to meet the humanitarian needs of a changing and increasingly fragmented world order.[28]

A blog post by Oxfam examines the intersection between feminism and localization, which share the mutual goal of transforming entrenched power imbalances.[29] This requires centring the voices and participation of affected and local populations in humanitarian response. Local actors may see their role as one that transcends aid provision; in this sense, the role of INGOs shifts away from implementation and delivery to focus on advocacy, capacity building and support for civic space at a time when it is shrinking around the globe. In order to stand in real solidarity with disenfranchised populations, INGOs must wilfully shift to this peripheral supporting role.

Trust, risk and uncertainty

A February 2019 Global Mentoring Initiative white paper explores mistrust in humanitarian settings, a common theme in many responses and one which can hinder progress on localisation.[30] Mistrust shows up in various ways: humanitarian workers suspect beneficiaries of lying to receive aid. Beneficiaries doubt the accountability and cost-effectiveness of the agencies providing relief. Local organizations are suspected by INGOs of having insufficient capacities. Local and national organizations warily compete with each other for the same limited pools of funding.[31] The paper suggests that local and international agencies undertake a more simple, transactional collaboration as a first step to explore if their values and priorities are sufficiently aligned to merit a long-term partnership. 'Soft skills' such as trust and relationship building are often lost in the fast-paced and chaotic atmosphere of a humanitarian response, but are imperative to addressing power dynamics amongst actors.

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[26] NEAR, pp. 6-11

[27] Global Mentoring Initiative. Why Localization? 1 February 2020, p. 1.

[28] Global Mentoring Initiative, p. 3.

[29] Rhodes, Francesca. What would a feminist approach to localization of humanitarian action look like? From Poverty to Power Blog, Oxfam, 14 August 2018. https://oxfamblogs.org/fp2p/what-would-a-feminist-approach-to-localisation-of-humanitarian-action-look-like/?fbclid=IwAR0CK-g3D8d20uEissu8C4nttiAt4cKXLP2Jdn1SIZ6CPcbsSIzkqwAuB3g

[30] Van Brabant, Koenraad. Prepared for Partnership? Trust and distrust in international cooperation. Global Mentoring Initiative, 27 February 2019. http://coastbd.net/wp-content/uploads/2019/03/Prepared-for-Partnership.pdf

[31] Van Brabant, 2019.

A 2019 mixed-methods study by InterAction further addresses the ways in which risk aversion disincentives partnership models of localisation.[32] INGOs often rely on a sub-granting model which mitigates risk to the INGO while limiting agency and increasing risks to the local partner. In other words, INGOs' efforts to mitigate their fiduciary risks are prioritized over security risks in operations. The authors propose five recommendations in order to overcome the impediment that risk aversion creates for localisation, "Shifting from risk transfer to risk sharing, taking a capacity-building approach to risk management in partnerships, strengthening security risk management, coordination, and practicing ethical duty of care."[33]

Clarifying localisation

A counterargument amongst those wary of localisation revolves around the need for humanitarian actors to remain impartial, neutral, and uninfluenced by local political dynamics. In an MSF report 'The challenges of localised humanitarian aid in armed conflict', Schenkenberg expresses MSF's reservations in regard to localisation. Schenkenberg stresses that neutrality and impartiality must be carefully considered in fragile environments; actors headquartered within the local context may be more prone to political pressure to preserve the national interest over that of the affected population, which could undermine humanitarian imperatives.

Schenkenberg also states that the localisation discourse 'suffers from a deliberate ambiguity when it comes to defining localised aid.[34] For example, in one context (such as the earthquake response in Nepal), localisation may mean that NGO workers from a population affected by natural disaster take the lead in providing aid in their own communities. In another context (Syria comes to mind), it could mean local teams of responders who are themselves displaced refugees lead the delivery of aid across a conflict-affected border. The Cox's Bazar response presents yet another arrangement, where localisation discourse emphasises the role of Bangladeshi aid workers and organisations more than the role of Rohingya themselves.

The same concerns over paternalism between international and national actors could re-emerge between local actors and beneficiaries; this is a significant point for consideration as it could in fact weaken the efficacy of aid and run counter to the original intent of the Grand Bargain.[35] The literature is limited on the benefits and pitfalls of localisation within a response context where local responders are not from the primary affected population. While beyond the scope of this review, an examination of sustainable development discourse will offer rich insights on how to reverse the top-down decision-making paradigm and centre the participation of the Rohingya. Given its position as a global leader on interventions such as microfinance, remittances, and self-help groups, Bangladeshi institutions are well-suited to ensure that the Rohingya are enfranchised to play a key role and must regard this responsibility with diligence.

Not only social power relations that must be contended with; linguistic, cultural, and political factors also weigh in. For example, localisation calls for coordination meetings to be held in the local language as often as possible. In the Cox's Bazar context, where few Rohingya speak Bangla and cannot travel to Cox's Bazar town, where many decisions are made, exclusionary practices may persist even if English were no longer used as a medium.

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[32] NGOs and Risk: Managing uncertainty in local-international partnerships. InterAction, 2019. https://www.interaction.org/wp-content/uploads/2019/03/Risk-Global-Study.pdf

[33] InterAction, 2019.

[34] Schenkenberg, Ed. The challenges of localized humanitarian aid in armed conflict. MSF Emergency Gap Series 03. November 2016, p. 3. https://arhp.msf.es/sites/default/files/MSF_EGS03_The%20challenges%20of%20localised%20humanitarian%20aid%20in%20armed%20conflict_november%202016_0_0.pdf

[35] For an in-depth analysis of protection considerations within a locally led response, see Protecting People in Locally Led Disaster Response. Humanitarian Policy Group, Humanitarian Advisory Group, and Australian Red Cross, March 2019.

Partnerships and complementarity: The way forward

Partnership as well as *complementarity* are two guiding principles for effective localisation. The Accelerating Localisation through Partnerships programme is a multi-year joint initiative by Christian Aid, CARE, Tearfund, ActionAid, CAFOD, and Oxfam that seeks to establish best practices in partnership between local, national, and international NGOs to foster localisation goals.[36] In a global study to consult the views on localisation by stakeholders in diverse locales, 80 percent of respondents felt that partnerships were an instrumental way to optimize efficacy in a response. The majority viewed partnerships as the single best way to achieve localisation, though 1/3 said capacity building was a preferable approach.

Respondents felt that local and national responders add the most value in the areas of human resources management, advocacy, and identifying capacity strengthening needs. Meanwhile, international NGOs were viewed as adding the most value in the areas of contributing to fundraising capability, technical expertise, and providing capacity strengthening support. Longer-term partnerships were felt to be more beneficial than short ones, which may be primarily transactional without prioritizing high-quality collaboration.[37]

Along with partnerships, complementarity is often seen as vital to localisation. Complementarity means understanding and investing in the relative advantages of local, national and international actors in terms of impartiality, skill sets, access, resources and expertise. Mapping complementarity across a response requires ongoing analysis by funders and key stakeholders genuinely striving to understand a complex ecosystem; doing so opens up space for conversations about cooperation over competition.

Hugo Slim, Head of Policy for the International Committee of the Red Cross, explored the following vision of complementarity in his keynote address at the 2019 Asia Pacific Humanitarian Leadership Conference:

> Sometimes local actors do not have enough of what they need. And here a complementarity of resources, expertise and encouragement must be enacted in the service of humanity. Justice demands that if resources are available and the method of their application will not breach the wider good of localization then they should be shared in a spirit of solidarity not power. Beyond arguments of necessity for international complementarity, there are ethical demands on localization itself.

> Humanity demands a localization of effective humanitarian response. It would be wrong to praise an operation if it were perfectly local but profoundly ineffective. It is not enough for localizers to say simply that 'we are better than neo-colonial international action because we enable the basic good of self-determination'. Local and national action must not only

> be self-determined, it must be effective as humanitarian action and live up to the standard of humanity. Humanity also demands a localization of non-discrimination…we must beware of a simplistic localization that hands over humanitarian action to patriarchal local structures who overlook women and girls, and whose power and perspective is as flawed as neo-colonial aid.

> Corruption is often the elephant in the room of localization discussions but seems to me to be a moot point in localization ethics. We can legitimately talk of corruption in many conflict and disaster-affected societies. But I think we can also legitimately speak of corruption in an international humanitarian system that employs too many people, flies them business class and pays tax-free salaries close to those of corporate lawyers.

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[36] Christian Aid, CARE, Tearfund, ActionAid, CAFOD, Oxfam (2019) Accelerating Localisation through Partnerships: Recommendations for operational practices that strengthen the leadership of national and local actors in partnership-based humanitarian action. 2019. Available at: http://coastbd.net/wp-content/uploads/2019/03/Accelerating-localisation-research-summary-global-1.pdf

[37] Accelerating Localisation through Partnerships, 2019.

And then there is deep systems change in international and national organizations…These structures will prioritize new skills and de-prioritize current skills as international staff move from being managers and operators to investors and advisors. International organizations will have to establish a relationship of cooperation not control. National and local organizations will need to become autonomous – liberated and in power. [38]

Sources of guidance for the Rohingya response

The following section provides an overview of the key recommendations generated and concrete efforts undertaken thus far to localise the Rohingya response in Cox's Bazar.

Advocacy points for localisation in Cox's Bazar

The Cox's Bazar CSO-NGO Forum (CCNF) is a network of local civil society organisations (CSOs) and NGOs in Cox's Bazar working to 'promote a human and gender-responsive society through positive engagement with government'.[39] CCNF is co-chaired by the leaders of three national NGOs: PHALS, YPSA, and COAST Trust. Several documents produced by CCNF, COAST and other institutions on the Cox's Bazar context are reviewed in this section.

A CCNF and COAST Trust white paper entitled 'Experiences and Challenges of Bangladeshi Civil Society, UN Agencies and INGOs: Localization Approach for Rohingya Response' provides an overview of the groups' localization achievements since the beginning of the response in August 2017 and summarizes ongoing challenges as follows:

i. Appropriate and accurate interpretation of localization and other Grand Bargain principles.
ii. As the signatories of GB and C4C, UN Agencies and INGOs must have implementation policy and milestone achievement target from their headquarter level.
iii. The need for a whole of society approach, in contrast to the silo-ized/ 'island' working style of many agencies.
iv. Accountability and transparency of aid agencies to local-level actors, in line with IATI guidelines. This is needed to track whether the 25 percent local aid commitment is achieved.
v. Staff poaching of NNGO and CSO staff by INGOs/UN, and other spending issues.
vi. Practical action needed to address local impacts of the crisis.
vii. Maintain global political and donor interest so that Bangladesh doesn't shoulder the burden alone.[40]

In another white paper, Strive for a System with Long Term Approach, No More Thriving in Chaos, CCNF lays out its position in favour of a long-term response with repatriation as the eventual target.[41] As such, CCNF calls for policy that favours self-reliance of refugees, formal education, and decongestion of the

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[38] Slim, Hugo. Leading big and small: Balancing scale and detail in humanitarian leadership. Keynote Speech to the 2019 Asia Pacific Humanitarian Leadership Conference, "Humanitarian Leadership and the Future of Humanitarian Action" Melbourne, 22-24 May 2019, p. 10-12. https://www.scribd.com/document/411300803/ICRC-Speech-Dr-Hugo-Slim-Leading-Big-and-Small?fbclid=IwAR0TC68zC1Blv7oEe5ssd9ffngj7_gBdGM2zG33HqDlE-fc_34IW6Orh65w

[39] See the CCNF's website, www.cxb-cso-ngo-org, for more information.

[40] Experiences and Challenges of Bangladeshi Civil Society, UN Agencies and INGOs Localization Approach for Rohingya Response, CCNF and COAST Trust. http://coastbd.net/wp-content/uploads/2018/06/Localization-Approach-for-Rohingya-Response.pdf

[41] CCNF and Local and National NGO representative of Strategic Executive Group. Comments on the draft JRP 2020 and advocacy position on Rohingya response: Strive for a System with Long Term Approach, No More Thriving in Chaos. 9 February 2020

camp environment. To cope with the reduction of aid in the forecast, local leadership, technology transfers, environmental restoration and a peacebuilding approach are needed to shore up social cohesion.[42] CCNF advocates for comprehensive involvement of LNGO representatives across coordination mechanisms and re-examination of the 2020 Joint Response Plan to address its lack of focus on localisation goals. Grand Bargain targets on localisation are still unmet, with under ten percent of funding currently going toward LNGO partnerships. CCNF sees greater sensitisation of decisionmakers to the importance of localisation as a starting point for Grand Bargain commitments to be taken seriously.

An overview of CCNF and COAST's work on localisation were also shared in a presentation entitled, 'Lessons learned and challenges: Localisation campaign in the Rohingya response', delivered at the Asia and Pacific Regional Conference on Localisation in Jakarta in August 2019.[43] The presentation describes the group's two-pronged approach: 1) working within the host communities to promote social cohesion and accept and refugees, and 2) convening multi-stakeholder dialogue to discuss localisation of the response.

CCNF advocates for a balanced approach in which the UN and INGOs provide monitoring and technical assistance, and the response is otherwise carried out under local leadership. The presenters noted a lack of accountability amongst agencies and the generally limited understanding of localisation premises amongst humanitarian workers. While there has been good support from the UN Resident Coordinator's Office and other international stakeholders, others were found to be far less supportive. As funding for the Rohingya response dwindles, more progress on localisation is needed.

COAST's research on localisation of the Rohingya response thus far, 'Business as usual or breaking the status quo?' was conducted by surveying 42 LNGOs and 19 INGOs and UN agencies.[44] The study determined that the great majority of LNGOs surveyed (82 percent) are filling an implementation role rather than working as strategic partners (8 percent). International respondents believed they were honouring the unique cultural values and practices of their local partners (85 percent state they honour these 'very much') far more often than LNGOs perceived this to be the case (only 19 percent said they were 'very happy' with this aspect of the partnership).[45]

It is notable that 68 percent of LNGOs said they were 'happy' and 6 percent 'very happy' with their partnership with the INGO/UN agency, and 82 percent said they were happy with the financial arrangement. While 90 percent of LNGOs say they participated in project design and 56 percent of LNGOs say they participate in decision-making, only 31 percent participated in evaluations, revealing gaps along the project cycle.[46] LNGOs also reported being unable to contact the project's back donor (75 percent) and bearing risks disproportionately (56 percent). 80 percent of LNGO respondents had lost staff to INGOs and UN agencies. In short, localisation in Cox's Bazar rests heavily on an implementation role for LNGOs and while LNGOs are generally satisfied with their partnerships, there is a lasting shortfall on the amount of aid allocated through partnership and various areas for improved practice.

Localisation, capacity and complementarity in Cox's Bazar

For the December 2018 Overseas Development Institute (ODI) report, 'Capacity and complementarity in the Rohingya Response in Bangladesh', authors Caitlin Wake and John Bryant evaluate the response to the rapid refugee influx in Cox's Bazar against the Grand Bargain localisation framework. They consider both *capacity* and *complementarity*. Capacity is multifaceted; forms of capacity include organisational, operational, technical capacities, as well as the capacity to adhere to humanitarian standards.

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[42] CCNF, Strive for a System with Long Term Approach, p. 1
[43] Localization campaign in Rohingya Response, Presentation by COAST Trust for Jakarta Conference. http://coastbd.net/wp-content/uploads/2019/08/Presentation-for_-Localization-campaign-in-Rohingya-Response_for-Jakarta-Conference_.pdf
[44] Business as usual or breaking the status quo? COAST Trust. December 2018, p. 3
[45] COAST Trust, p. 4
[46] COAST Trust, p. 5

Complementarity means a division of labour built according to the comparative advantages of different actors.

Wake and Bryant consider factors enhancing and limiting the capacities of different actors, and suggest we consider 'capacity exchange' amongst actors rather than 'capacity building', which comes across as unidirectional.[47] ODI's research on the Rohingya crisis is a case study within a broader global endeavour to better define localisation, because:

> Bangladesh enables us to look at localisation in the context of a government that has shown strong national leadership in responding to the crisis, alongside a vibrant civil society and LNHAs who are vocal about localisation…Bangladesh is experiencing significant poverty and regular disasters. The perception of national capacity to respond to disasters is generally positive, while improvement has been noted in development and poverty alleviation, prompting us to explore the question of whether said capacity can be translated and applied to refugee response.[48]

Wake and Bryant conclude that rich capacities were present in Cox's Bazar prior to the influx due to the legacy of development and disaster risk reduction and relief expertise in the area. Yet the magnitude and complexity of the refugee influx presented technical challenges that have at times exceeded existing local capacities. Several interviewees viewed LNGOs as having a pro-host community, anti-Rohingya bias; other interviewees criticized INGOs as pro-Rohingya, anti-host community.

Furthermore, some LNGO interviewees viewed NNGOs and INGOs as opportunistic, only working in Cox's Bazar after the refugee influx because of the sudden available funding.[49] Wake and Bryant describe at length how different stakeholders view each other; several additional notable findings which could affect a localisation roadmap are not included in this desk review in the interest of brevity. The authors opted not to consult refugees during their research, out of ethical considerations; Rohingyas' own perceptions of what practices and actors yield efficacious aid remains a sizeable gap in the literature.

Wake and Bryant do note that a restrictive policy environment hinders spaces in which capacities of affected populations could be developed. This exacerbates power imbalances, particularly as they relate to refugee participation, rights and protection. This exclusion produces a localisation discourse that risks failing to centre the well-being of refugees themselves, calling into question the goals of localisation and who stands to benefit. As the authors note, 'Discussions around capacity, complementarity and localisation are only relevant insofar as they remain firmly grounded in meeting humanitarian needs and serving the needs of affected populations'.[50]

Mission report

Subsequent to the signing of the Grand Bargain, Localisation Workstream members selected Bangladesh as one of three 'demonstrator countries' which would be studied in detail in order to deepen understanding about localisation practices amongst local stakeholders; identify good practices, challenges and barriers; and promote progress on localisation commitments.

To carry this out, a multi-agency mission was undertaken by nine members of the Grand Bargain Localisation Workstream and conducted from 8 to 13 September 2018. The mission report makes the following recommendations:

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[47] Bryant, John and Wake, Caitlin. HPG Working Paper. Capacity and in the Rohingya Response in Bangladesh. June 2018, p. 1. https://www.odi.org/sites/odi.org.uk/files/resource-documents/12554.pdf
[48] Bryant and Wake, p. 1.
[49] Bryant and Wake, p. 11.
[50] Bryant and Wake, p. 40.

1. **For institutional donors and bilateral donor agencies** to 1) have partnership agreements that integrate good practices that support leadership and capacity of local and national humanitarian actors; 2) increase the proportion of unearmarked and multi-year humanitarian assistance through direct or as-direct-as-possible (one transaction layer) partnerships with national and local actors or through country based pooled funds; and 3) work with the UN Resident Coordinator and government to continue strengthening local and national leadership.

2. **For UN agencies and International NGOs** to develop ethical human resource standards relevant to surge, support mutual capacity strengthening systems, put in place more flexible, contextualized and inclusive coordination mechanisms, improve access to and engagement with the humanitarian donor architecture for the local and national actors, provide fair coverage of overhead costs, and foster the engagement of women through the work of the Bangladesh Women Humanitarian Platform (BWHP).

3. **For local and national actors** to 1) work with smaller local humanitarian actors in a transparent and equal manner and 2) use existing networks to come up with a common definition of local and national actors, and to agree on ways on how to better collaborate, respect and build on one another's strengths.

4. **For the Government of Bangladesh** to identify opportunities to strengthen local and national leadership and decision-making in humanitarian action, including the enabling and regulating role of the NGO Affairs Bureau.[51]

The mission report also calls for longer funding timelines (three years) to allow time for an incremental transition toward localisation; support for capacity building of local and national actors on refugee protection and rights; and targeted investments to help local and national organisations scale up.

The report notes the apparent lack of gender balance within the localisation movement and calls for local women's voices to be included in planning processes.[52] The mission report recognizes successes in various areas within the Cox's Bazar response: progress in local-international partnerships, capacity strengthening efforts, financing availability to local and crisis-affected stakeholders, and the inclusion of local actors in coordination mechanisms.[53]

Terms of Reference for the Localisation Task Force

A Localisation Task Force (LTF) Terms of Reference was endorsed on 16 May 2019. Facilitated with the support of the UN Resident Coordinator and ISCG in Dhaka, the LTF aims to define the necessary preparations for follow-up discussions in Cox's Bazar, including potential modalities for including input from additional stakeholders including representatives from the government, host communities and

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[51] Grand Bargain Localisation Workstream. Mission Report. September 2018, p. 4. Available at: http://media.ifrc.org/grand_bargain_localisation/wp-content/uploads/sites/12/2019/07/Bangladesh-Mission-Report.pdf. The Localisation Workstream co-conveners in Bangladesh include the International Federation of Red Cross and Red Crescent Societies (IFRC) and the Swiss Agency for Development Cooperation (SDC), with support from National Alliance of Humanitarian Actors in Bangladesh (NAHAB), COAST Trust, Bangladesh Red Crescent Society, the Office of the UN Resident Coordinator, IFRC, Oxfam, and Christian Aid.
[52] Grand Bargain Localisation Workstream Mission Report, p.4.
[53] Grand Bargain Localisation Workstream Mission Report, Annex 1.

refugees.[54] LTF meetings include two representatives each from local and national NGOs, international NGOs, and UN agencies and donors, while ensuring that the voices of women stakeholders are included. The following guidelines are also provided:

a. It is understood that organizations represented on the task force will play a leading role in facilitating implementation of the roadmap.
b. While the abovementioned four groups will be represented at each meeting, the individual representatives may vary between Cox's Bazar and Dhaka discussions. However, each constituency will strive to ensure continuity in their participation in the task force.
c. Each representative will be bound by prior decisions of the task force, regardless of whether (s)he physically attended the prior meeting when it was taken.
d. The task force will select one of its members to 'chair' meetings. The chair's role is to facilitate practical discussions that lead to decision points on the agenda items.
e. Meetings will be 'facilitated', in terms of secretariat support, by the RCO in Dhaka and the ISCG in Cox's Bazar.
f. The pace of meetings will reflect the anticipated timeline for submitting the road map.[55]

After the initial meetings in Dhaka to launch the process, the LTF plans to meet in Cox's Bazar to specify immediate concrete steps and modalities to localize the response in the areas defined in Dhaka as well as define the longer-term steps in greater detail and areas where more support from Dhaka is needed.

Localisation Task Force: Potential Workstreams

Further to the guidelines and workplan established in the Terms of Reference, the LTF produced a proposed set of five workstreams through which to design and operationalise concrete actions for localisation.[56] These include:

1. Local government management of the response
2. Local procurement and value addition
3. Partnership in the coordination and delivery of the response
4. Consolidation, value for money and financing
5. Skills, recruitment and labour

These five workstreams have not been implemented yet. One step toward actualizing them would be to formulate a multi-stakeholder committee for each of the five, comprised of refugee, host community, LNGO, NNGO, and INGO/UN representatives.

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[54] Terms of Reference for the Localization Task Force, 16 May 2019.
[55] Terms of Reference for the Localization Task Force.
[56] Localisation Task Force. Draft Discussion Paper: Potential Workstreams.

Conclusions and gap analysis

The Grand Bargain recognises the respective strengths of local, national and international organizations; a complementarity approach can be applied for the optimisation of humanitarian aid. A debate exists as to the best ways to achieve the partnership, complementarity and capacity goals examined in this desk review. INGOs may or may not have the 'capacity to capacitate'; and nuanced capacities can only be expected to emerge vis-a-vis opportunities for participation. Thus, the policy barriers and systemic inequities that limit the opportunities of local and refugee stakeholders to engage and gain experience should be considered and reduced.

The goal for 25 percent commitment of aid to be allocated to local and national organisations means that funders, practitioners and policymakers must carefully consider which types of programming are best provided by different actors, and LNGO-INGO/UN partnerships should be formed with an understanding of each partner's relative strengths. Given that the Rohingya crisis appears intractable, an additional consideration is how the balance of roles amongst actors should shift as the long-term response proceeds.

Many questions remain, such as how national but non-local responders are to be regarded – the elephant in the room is the role BRAC would play as one of the largest and most prominent national actors. Yet it is the lack of Rohingya refugee (and affected host community people's) voices that remains the most obvious gap within the existing literature. It is not clear from the existing materials how Rohingya and affected host community residents themselves experience aid as efficacious, or how a shift in actors would benefit them. Their inputs will be critical to developing a coherent roadmap that leads to improved humanitarian and development outcomes.

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Annex -2: List of Consultation Workshops and KIIs

No	Activity	Stakeholder	Number of Participants	Date	Location
		Consultation Meetings			
1	Consultation Workshop	Representatives of Local NGOs of Cox's Bazar (1st Group)	25 persons	17-Dec-19	COAST Trust Office, Cox's Bazar
2	Consultation Workshop	Rohingya Refugee Youth and Leaders	31 persons	18-Dec-19	BRAC Area Office, Kutupalong, Ukhia, Cox's Bazar.
3	Consultation Workshop	Host Community Youths and Leaders	29 persons	18-Dec-19	CPJ Field Office, Ukhia, Cox's Bazar
4	Consultation Workshop	Local Government Representatives of Cox's Bazar	22 persons	19-Dec-19	Hotel Best Western Heritage, Kolatoli, Cox's Bazar
5	Consultation Workshop	CSOs and Local Media People of Cox's Bazar	39 persons	20-Dec-19	Light House Family Resort, Kolatoli, Cox's Bazar
6	Consultation Workshop	Dhaka Level Government Officials (Members of National Task Force on FDMN)	15 Persons	26-Jan-20	CIRDAP Auditorium, Topkhana Road, Dhaka
7	Consultation Workshop	National Level NGO Representatives	9 Persons	26-Jan-20	CIRDAP Auditorium, Topkhana Road, Dhaka
8	Consultation Workshop	International NGO Representatives	14 Persons	27-Jan-20	Amari Dhaka Hotel, Gulshan-2, Dhaka-1212
9	Consultation Workshop	Representatives of UN Agencies	10 Persons	27-Jan-20	Amari Dhaka Hotel, Gulshan-2, Dhaka-1212
10	Consultation Workshop	Cox's Bazar Level GoB Officials, RRRC and CiCs	25 persons	1-Feb-20	RRRC Office, Cox's Bazar
11	Consultation Workshop	Local NGOs and CSOs Representatives (2nd Group)	18 persons	1-Feb-20	Seagull Hotel, Cox's Bazar
12	Consultation Workshop	Sector Coordinators, Inter Sector Coordination Group (ISCG)	15 Persons	2-Feb-20	ISCG Office, Cox's Bazar
13	Consultation Workshop	Rohingya Community People	20 Persons	2-Feb-20	CPJ Field Office, Kutupalong, Ukhia, Cox's Bazar

No	Activity	Stakeholder	Number of Participants	Date	Location
14	Consultation Workshop	Host Community People	16 Persons	3-Feb-20	Brac Office, Ukhiya, Cox's Bazar
15	Consultation Workshop	Head of Sub-offices (HOSO), ISCG	15 Persons	3-Feb-20	ISCG Office, Cox's Bazar
16	Consultation Workshop	Representatives of Donor Agencies	15 persons	6-Feb-20	Resident of the British High Commissioner in Bangladesh, Dhaka
17	Consultation Workshop	European Civil Protection and Humanitarian Aid Operations (ECHO) and SDC Representatives	3 Persons	11-Mar-20	European Union Office, Dhaka-1212
Key Informant Interview (One-to-one Meeting)					
18	Key Informant Interview (KII)-1	Mr. Rezaul Karim Chaudhury Executive Director, COAST Trust	1 Person	20-Dec-19	Office of COAST Trust, Cox's Bazar
19	Key Informant Interview (KII)-2	Mohammad Abul Kalam, Additional Secretary, Ministry of Jute and Textile	1 Person	28-Jan-20	Bangladesh Secretariat, Dhaka
20	Key Informant Interview (KII)-3	Al Mamun Azad, Senior Emergency Response Manager, Christian Aid	1 Person	26-Feb-20	UNDP Sub-office, Hotel Shaibai, Cox's Bazar
21	Key Informant Interview (KII-4	Shaikh Asharaf Ali, Policy Lead, OXFAM, Cox's Bazar	1 Person	26-Feb-20	UNDP Sub-office, Hotel Shaibai, Cox's Bazar
22	Key Informant Interview (KII)-5	Maheen Newaz Chowdhury, Area Director, Save The Children	1 Person	26-Feb-20	UNDP Sub-office, Hotel Shaibai, Cox's Bazar
23	Key Informant Interview (KII)-6	1. Kerry McBroom, Site management Sector, Danish Refugee Council 2. Nana Kharbedia, Site management Sector, Danish Refugee Council.	2 Persons	26-Feb-20	UNDP Sub-office, Hotel Shaibai, Cox's Bazar
24	Key Informant Interview (KII)-7	Manuel Marques Pereira, Deputy Chief of Mission, IOM (He was accompanied by Mr. Shintaro Higashiyama, Localisation and Private Sector Partnership Officer, IOM Bangladesh)	2 Persons	26-Feb-20	UNDP Sub-office, Hotel Shaibai, Cox's Bazar
25	Key Informant Interview (KII)-8	Mike Pearson, Programme Manager, Street Children	1 Person	26-Feb-20	UNDP Sub-office, Hotel Shaibai, Cox's Bazar

No	Activity	Stakeholder	Number of Participants	Date	Location
26	Key Informant Interview--9	Marija Rakovic, Humanitarian Coordinator, UNFPA	1 Person	27-Feb-20	IFRC Sub-Office, Motel Labony, Cox's Bazar
27	Key Informant Interview-10	Kamlesh Vyas, Humanitarian Coordinator, Helvetas	1 person	27-Feb-20	IFRC Sub-Office, Motel Labony, Cox's Bazar
28	Key Informant Interview-11	Rajan Ghimire, Partner Program Coordinator, Malteser International	1 Person	27-Feb-20	IFRC Sub-Office, Motel Labony, Cox's Bazar
29	Key Informant Interview-12	Abdullah Fuad, Head of Program- Emergency Response Program (Shelter Sector), Caritas Bangladesh; Mr. Ratan Kumar Podder, Co-coordinator, Shelter/NFI sector and Mr. Pintu William Gomes, Project Director, Emergency Response Program, Caritas, Bangladesh).	3 Persons	27-Feb-20	IFRC Sub-Office, Motel Labony, Cox's Bazar
30	Key Informant Interview-13	Didarul Alam Rashed, Executive Director, NONGOR, Cox's Bazar	1 Person	9-Mar-20	Office of Nongor, Cox's Bazar
31	Key Informant Interview-14	Mohamamd Hosen Shikdar, Representative, Ukhiya based CSO and NGO Alliance	1 Person	9-Mar-20	Help Cox's Bazar Office
32	Key Informant Interview-15	Flora Macula, Head of UN Women Sub-office Cox's Bazar (She was accompanied by Ms. Sunee Singh)	2 Persons	10-Mar-20	Motel Upal, Sub Office, UN Women, Cox's Bazar
33	Key Informant Interview-16	Ahmed Ekzayez Programme Specialist, FAO	1 Person	10-Mar-20	Hotel Saibal, FAO Office, Cox's Bazar

Activity	No. of Events	No. of Participants
1. Consultation workshop	17	321
2. Key Informant Interview	16	21
Grand Total	**33**	**342**

Annex-3: Reviewers' Feedback on Localisation Roadmap Report

Reviewers' Comments and Feedback		CPJ's Response
1. Baselines, & monitoring	The need to undertake more detailed analysis in order to generate the baseline and fine tune the monitoring indicators, which would be an important part of the process – particularly if they are linked to the JRP. The process of undertaking the analysis (and potentially who might do it) could be included with the work activities of the different elements. Linked to this, I think it is also worth considering whether opinion surveys (e.g. amongst refugee and host communities) may be useful to take stock of or indeed commission, particularly where this throws lights on people's trust and confidence in local, national or international agencies and staff.	We may include review Indicators and undertake baseline during the inception period. Such surveys may create conflict between "Local-NGO-Power" vs. others. The suggestion is welcome though and can be revisited in the future.
2. Deliverables	You could consider finding some concrete and early deliverables in order to build confidence in the localisation plan. This may also require some closer focus on taking forward some of the eleven elements before others.	The localisation concept is designed as a change management process, which by default prioritizes "Early Achievement" outputs to gain trust and confidence. A set of Activities under various Outputs can be listed for this purpose.
3. COVID-19	As mentioned in the meeting, COVID-19 is having an impact on localisation – both positive and negative. This needs to be considered. The studies for the baselines could help generate some evidence on the impact to date and the potential trajectory.	It can go in the Conclusion section and can be a recommendation.
4. Output 11: Localisation Driver	One area that requires further thought and discussion is the proposed Localisation Driver. I think you may want to consider whether some form of hybrid options may be appropriate to include, such as a co-chaired arrangement between, say the RRRC and ISCG, potentially supported by a secretariat, which would then help anchor it in the JRP.	CPJ cannot singlehandedly determine the structure and authority of the LD, as deciding it is a process requiring the input of many stakeholders beyond the scope of this roadmap. However, we can make more thorough recommendations and list a few specific options in the narrative section for Output 11.

5.	**Sensitive content**	And finally, a few more detailed points. I think the reference to teachers using Bangla in the refugee learning centres may be true, but is not helpful. There is also a reference to a host community member stating that the Rohingya do not properly understand religion – though it's not clear where you are taking this point in the surrounding text/section. I think it's worth having a look at these.	We can revisit sensitive sections.
6.	**Summary version**	I also agree with the comment in the meeting that it would be useful to generate a much smaller tighter version, which covers the main elements of the road map.	This is possible and would be useful. CPJ can prepare a 5 to 10-page document summarizing the objectives, rationale, outputs and results framework. Most or all of the narrative section and quotes would be omitted.
7.	**Output 3: Cost-effective and innovative funding tools and mechanisms**	Pooled funds are problematic for some donors, including USAID, due to the lack of oversight and accountability we get out of those arrangements, therefore in its efforts on localization, USAID will review more on direct funding arrangements, tapping into our innovative partnership mechanisms.	CPJ acknowledges that donors have to adhere to their own institutional requirements, which may be an obstacle for pooled funding. We can highlight this as a likely limitation for pooled funding by quoting such donor concerns in the report. The LD can also promote the strengthening of institutions over time by undertaking further capacity building measures related to oversight and accountability. This may make pooled funding more possible over time.
8.	**Output 1: Capacity building**	For many donors, including USAID, direct funding arrangements to local entities require an evaluation of internal control procedures and organizational management. The Localization Framework does not substantively address capacity building for local organizations, which would enable them to administer international donor funding. Design, implementation, monitoring and technical skills were briefly addressed, with a very cursory mention of a bidding workshop (pages 38 & 75) but budgeting, internal controls, board/organizational development, financial management as skills for capacity development were not addressed whatsoever, which makes implementation of the recommendations problematic.	The list of courses (e.g. internal controls, budgeting) can be easily expanded depending on the actual needs identified by donors. Financial management is included as an area of capacity building. The roadmap avoids delving into technical detail in terms of training areas for the sake of brevity, and because the LD will be responsible for elucidating the details and operationalization. This deliberate lack of detail be stated more clearly in the report.
9.	**Output 1: Capacity building**	The draft seems to lump concern about financial management and budgeting controls up into a call to build more "Program Management" Capacity overall	CPJ will add to the sample list of capacities ("budgeting, internal controls, board/ organizational, financial management and English skills") to the Output 1 section. CPJ anticipates that donors

	as part of Output 1. There should be more explicit language to highlight the need for local organizations to be able to demonstrate capacity for budgeting, internal controls, board/ organizational, financial management and English skills. For example, there are complexities involved in a partner receiving funding from more than one donor (i.e. if a local partner is receiving funds from more than one donor, then they will be required to track USAID funding separately. This requires a strong financial management system that can track funding by donor)	would offer trainings on specific systems and tools that interested organizations could attend. Therefore, specific training content will mainly be a matter for future elucidation by donors and the LD.
10. **Output 1: Capacity building**	Each donor has their own policies and procedures for how they need to manage risk and how to evaluate whether a local organization has achieved sufficient capacity to receive donor funding directly, therefore there is a need to build capacity on these general skills, but then also find ways to clearly communicate specific requirements by donors about how an organization will be evaluated as a suitable partner and what accountability procedures will be required post award as well.	Agreed that capacity building includes general and specific elements. CPJ can reflect on this in the section on Output 1. The LD will put into place self-assessment criteria for the NGOs. Capacity needs will emerge from this process.
11. **Output 7: Accountability** 12. **Monitoring**	One way USAID manages risk is with frequent monitoring, and as long as access is hindered, risk aversion for local partners is high unfortunately. In order to successfully implement the paper's recommendations, there is the need for coordinated discussion with national authorities to emphasize the need to access program locations.	Yes, access is important. CPJ can mention this in Output 7.
13. **Output 9: Effective Communication Systems** 14. **Language**	Some at USAID agreed that a concerted push by donors to communicate in local languages (in Bangla) on bidding procedures or partnership opportunities is a good idea. However, for USAID, as it may be for other donors, it might be problematic from a donor's regulatory requirements to exclusively communicate with partners in Bangla, and will present complexities logistically given donors' audit, reporting and oversight requirements during award.	The report does not suggest that Bangla be used exclusively. We recommend that Bangla and English be used in all communications; we can emphasize this more clearly.

15. Work plan	Another question for implementing the draft's recommendations is the timeframe, which is very vague as to how it will be applied. In general, a three-year model of localization lacks development credibility. There is an urgent need to reintroduce NGO capacity activities, more substantively and over a longer timeline.	In part 3 of our report we have timeline for specific activities under each output. But obviously implementation of localization roadmap is not a 3 year task. We will more visibly highlight this in the report. We can propose a 4-year initial plan instead with two phases: a) inception (1 year) and implementation (3 years).
16. Executive summary Livelihood and education opportunities for refugee and host communities are widely regarded as crucial to the success of the long-term response.	I have some reservation with specification e.g. livelihood and educational as rights of citizen in Myanmar also an issue and part of localization – people can't feel dignified only with financial or education	Good point for our consideration.
17. Output 1: Capacity building Diverse stakeholders envision international NGOs transitioning away from direct response toward technical, monitoring and fundraising support for local actors.	Again I will request not to be very specific, we could end with technical to ensure operational excellence and sustainability which might include range of areas not just three specific issues.	CPJ will aim to balance specific and general guidelines for the capacity building component.
18. Output 3: Cost-effective and innovative funding tools and mechanisms Pooled and direct funding options and longer project timelines could accelerate localisation goals. Pooled funds are multi-	Should we add another bullet point on aid data transparency as the Grand Bargain highly emphasizes transparency work stream and focused on the publication commitment in order to stimulate data availability? Humanitarian data is critical for decision making, particularly to work connectively and coherently to address gaps and demonstrate value for money	Good point for our consideration.

donor humanitarian financing mechanisms they can be set up to harmonise and simplify proposal and reporting requirements to improve accessibility for local actors.		
19. For each of the following eleven outputs, key performance indicators, activities, rationale, targets and baselines are elucidated in the framework	Make the outputs clearer in terms of which are <u>program service driven, operational process driven, value driven.</u> For example, social cohesion, capacity building could be cluster under program service, on the other hand accountability, camp management could be cluster under of operational process.	Good point for our consideration.
20. Output 11: Localisation Driver	What does it really mean – who are they at what level and why? Such clarity will add value.	The report has already elaborated on this matter.
21. Sharing the burden	Should we say "responsibility" instead of "burden"? Because the word burden might make the affected population feel undignified.	Good point for our consideration.
22. Improving value for money Donor-dominated humanitarian assistance often results in high transactional costs and extensive sub-contracting, creating additional resource flows and spill-over effects as a significant share of resources are lost to overheads. In contrast, localisation generates more value for money.	Should we add one more bullet on aid transparency as accountability of donors and responders with open data is crucial and vital which highly emphasized by the Grand Bargain.	Good point for our consideration.

23. Activity 1.1: Training opportunities Provide need-based and demand-driven basic and advanced training in the following areas, using Bangla as medium of communication:	I will advise to add transparency of data management.	Good point for our consideration.
24. Activity 2.1: Formation of SHGs Organise workshops to motivate Rohingya refugees, particularly youth and technical experts, to form SHGs in their areas of interest. Some examples include	I will advise to add volunteer management as volunteers are frontline responders.	Good point for our consideration.
25. Roadmap Output 3: Cost-effective and innovative funding tools and mechanisms	Advise to emphasize on minimum data standard for publish and accessibility to ensure accountability of donor, INGO, NGO and Government	Good point for our consideration
26. Activity 3.3: Database registration	I will emphasize on standardized deployment database	Good point for our consideration
27. Roadmap Output 4: Effective Camp Management	Please review based on operational excellences indicators e.g. organization undertaking, what's the estimated value of response, and what's the status of each? Review system for operational improvements, to develop standard best practice	Good point for our consideration.
28. Roadmap Output 5: Development services for the host communities	It is not clear when I am looking into activity – talked about employment with prescription	We can reword our analysis for more clarity, and may use more info from our FGDs with host communities and other sources.

29. Roadmap Output 6: Social Cohesion Host communities, represented by local government representatives (LGRs), are included in decision-making, are sensitive about the plight of the refugees and the necessity for expected humanitarian attitude towards them, and have a conflict resolution system in place.	Lets link with national volunteering which is proven approach for peace building	We are not aware of national volunteering. More info would be appreciated.
30. Roadmap Output 7: Accountability Government agencies including the RRRC, NGO Affairs Bureau and local administration bodies are supportive of localisation initiatives and seek accountability from local and international service providers.	Need to link with financial data transparency.	Good point for our consideration.
31. Roadmap Output 11: Localisation Driver A Localisation Driver (LD) will be based in Cox's Bazar and accountable to the Government of Bangladesh and donors with a comprehensive organisational set-up,	It seems out of space – all 10 outputs link with facilitation of localization – rather advise to link with operationalization	We exactly mean what the reviewer suggests. Maybe we have to review our formulation and explanation. Output 11 looks at how to establish the proposed LD as a facilitator in order to operationalize the process.

TOR, policies and resources; the LD will be available to facilitate the localisation process amongst all stakeholders.		
32. Length of report	The report is too big. It would be great if the report would be short and crispy.	This is a good point and also made by others. We consider it as a separate task.
33. Roadmap Output 3: Cost-effective and innovative funding tools and mechanisms **34. Pooled funding**	The pooled funding is a very good recommendation. However, the governance of pooled funding is not clear. We may take the experience from "Manosher Jonno Foundation" and "Start Fund".	A similar concern was raised by others. We need to take it in to consideration. This can be worked out in detail during the inception phase.
35. Roadmap Output 11: Localisation Driver	I like the idea of establishment of Localisation Driver. However, there should be inclusion of National and Local NGOs in the Localisation Driver.	We can consider this in our proposed LD structure options.
36. Financing of localisation	Both pooled funding and the Localisation Driver need resources. An estimated financial plan and source of funding may help LTF and SEG to move forward.	This is important; however, it is outside of the scope of this report.
37. Executive summary Complementarity: Whereas international NGOs are recognised for their technical expertise, local NGOs possess better contextual knowledge, cultural competencies, and local language fluency,	How about the capacity and skills that already exist within the Local NGOs, but which however need to be upgraded?	We will make necessary changes reflecting this point.

amongst other strengths.		
38. Assessing capacity "Similarly, assessments will be needed to determine capacities, training needs and priorities of local NGOs, host community representatives, and Rohingya self-help groups."	How about also Rohingya CSOs?	By Rohingya self-help groups we mean Rohingya CSOs as well same. However, CSO may hint at a formal group, which is sensitive. We avoided the word CSO. By "self-help group" we mean an informal CSO. It cannot expect funding as an entity.
39. Sensitive content "Numerous and diverse stakeholders expressed concern that some actors in Cox's Bazar have misappropriated the meaning of localisation and focus on calling for increased funding to local NGOs while overlooking other components of comprehensive localisation."	I will suggest to change this word "misappropriated the meaning of localisation" to misunderstand.	Although this is a summary of comments heard from multiple sources and not CPJ's opinion, we will make necessary changes.
40. For each of the following eleven outputs, key performance indicators, activities, rationale, targets and baselines are elucidated in the framework:	Can we add aid transparency and participation here?	We agree with emphasizing aid transparency and participation more clearly and we can make necessary chnages.

41. Capacity building of local actors	Can we say capacity increase? I think local actors have capacity however, they need increase the capacity to resolve the gap	Regardless of the term used (capacity building, exchange, increase, development), CPJ wishes to advocate for the concept that everyone is a lifelong learner. We can define these notions of capacity and capacity building in greater detail in the narrative section for Output 1.
42. Formation and development of voluntary Rohingya self-help groups	I will suggest to include CSO too which will help within Rohingya community to build their leadership.	We prefer to use the terms "SHG" or "CBO" which are more informal than "CSO," as the matter of Rohingya civil society development in the camps remains a sensitive one.
43. Introduction "Rohingya refugees now comprise over three-quarters of the total population in the Teknaf and Ukhia upazilas, where host communities who served as the first responders to the influx now fear the depletion of land and forest resources and navigate rising social tensions."	How about Bhasan Char as the government had already deployed some refugees there, though the number is small but may increase future. Not sure in fact that the report need to mentioned that?	Mentioning Bhasan Char may not have any negative implication, so we can accept this.
44. Introduction "The *Localisation Roadmap* developed by CPJ considered outcomes from the consultative process as well as previous discussions about localisation of the Rohingya humanitarian response in Bangladesh, in particular discussions and	There are NGOs out of CCNF and sure you also talk with him. Also, I understand that you also talked with the refugee and host community.	We can expand a bit and include our discussion with refugee and host communities here.

decisions reached by the Localisation Task Force (LTF) of the Strategic Executive Group (SEG), the 2018 recommendations and roadmap from the Grand Bargain Workstream Demonstrator Country Field Mission, outcomes and recommendations of the Cox's Bazar CSO & NGO Forum (CCNF) consultations with UN, NGOs and Government of Bangladesh, and previous Cox's Bazar-level discussions facilitated by the Inter Sector Coordination Group (ISCG).		
45. Definition "This definition presumes that there will always be activities that cannot or should not be localised, such as fundraising. Similarly, there will always be activities, which cannot or should not be externalised for external managements, such as refugee burial rites."	Is it right? Nowadays we found that a number of donors call access to national NGOs. The national NGOs also raised funds from the private sector and international avenues. However, still the percentage is low. Please check.	We can think about our example and find a more appropriate one.

46. **"A national organisation should be selected over a local one only if a Cox's Bazar-based competitor does not demonstrate the required skill set."**	In some cases National NGOs have better access to funding for due diligence	Good point to consider.
47. *Equitable opportunity -* **Localisation must also ensure that national and local staff are prioritised for employment across all agencies and levels.**	According to the Grand Bargain, employment of national staff in international organizations is not part of Localisation	Good point to consider.
48. *Politicisation and misuse of the term -* **Numerous and diverse stakeholders expressed concern that some actors in Cox's Bazar have misappropriated the meaning of localisation and focus on calling for increased funding to local NGOs while overlooking other**	Request to change the word "misappropriated the meaning of localisation" to misunderstand	Good point to consider.

components of comprehensive localisation.		
49. Output 1: Capacity building of local actors	I think the National and Local NGOs have certain capacity and skills. Can we say capacity development?	Good point to consider.
50. Forty organizations have been banned by the government in recent years; most are local. Local organisations don't have the necessary capacity to manage large funds and they barely see the bigger, wider picture of humanitarian action.	A number of the organizations also expelled because of their political motive.	Good point to consider.
51. Quote "To local actors, only getting money matters to them. But for us donors, it's not important who gets the money but rather what the beneficiaries are getting from it."	I do not agree. Most of the local organizations talked about aid transparency, good governance, participation and mutual respect.	We also do not agree. Sensitive quotes will be removed from the text.
52. Roadmap Output 11: Establishment of a Localisation Driver	This is a real and practical suggestion. However, when I see the diagram below, I didn't find N/LNGO as a part of Localisation Driver. I will suggest to include N/LNGO within the main stream of Localisation Driver. Resourcing for Localisation Driver and activities is not suggested in the report.	Good point to consider. A Steering Committee for the LD may have representation of the NGOs.

53. Summary version	Thank you UNDP and IFRC for leading the Localization Task Force (LTF) and commissioning the report. Also thanks to the UNRC who was behind all these effort, always listened to and guided us. This might be the first in this kind of study on how localization could be integrated in respect of refugee humanitarian response. We are also thankful to CPJ Brac University for the work, especially to Barrister Manzoor Hasan. We would like to request CPJ to make abridge version of it (could be limited in 5 to 10 pages) after necessary revision, with actionable recommendations, so that a policy makers will understand it easily. Now it is more than 100 pages.	As mentioned above, we can prepare a 5 to 10-page summary version with key points.
54. Inclusion of feedback	Our comments should be added as an annexure of the LTF final report.	That would be possible and useful. We could include this feedback matrix to be added as an annex.
55. Work plan	Along with CCNF (Cox's Bazar CSO NGO Forum) we have been advocating for the process of localization since the Rohingya influx (September 2017). The Grand Bargain Field Mission came to Bangladesh in September 2018. After formation of LTF we have spent around 6 months to set the leadership, 6 months for the study and maybe we need another 3 to 6 months for report finalization, including placing to SEG to be agreed with. That means it may take whole 2020. So, it is an extraordinary delay in the total process. Localization is the low cost, accountable and sustainable approach of humanitarian response. In the meantime approximately $2.5 billion has already been spent. Due to COVID 19 expatriates are already in restrictions for field movement. There is an inevitable and drastic fund reduction resulting from economic recession. So, instead of being a by-default option, localization must be a planned process and should start immediately. Anyone should realize that incoming situation should not wait for the report.	Referred to UNDP and IFRC

| 56. Context and background information | Localization means to meet the greater demand with appropriate cost structure putting WoSA (Whole of Society Approach) in place. Fund reduction should not affect only the food and other necessary supply. The need and aspiration are greater now including pre-fabricated two-story shelter (as CCNF demanding since the beginning and repeated those again during positioning on JRP 2020), higher level of education and income generating activities as primary needs in the camps along with social cohesion and peace building.

There hardly any clear statistics have been able to give on 25% to the host community from ISCG, there are little of "Cox's Bazar District Planning" effort from UNDP. CCNF studies shows that partnership of local NGOs has been reduced to 4 to 8% both in camps and host communities. We observed there are might be some hidden local NGO drive out process is happening in Rohingya response. Local started to think what have had happened it is mere public relation job, very little in reality. ISCG present leadership hardly give space to the local NGO leaders for simple meeting and appointment. Since the beginning there is no space for local government in response management. Frustration is gradually growing up both in the camps and outside.

UN agencies and INGOs need to show "GENIUNE" inclusive approach toward local NGOs and local governments, we believe in involvement of UN agencies and INGOs but with dignified and equal partnership. At the end it is not the gift project, physical infrastructure will not work, it is the equal partnership for social cohesion and human / refugee rights based sensitization and awareness will create a base for sustainable response. The best protection and advocacy have to come from local actors. There are proven track records local actors in this regard, CCNF is the vivid example, neither any UN agencies nor any INGOs have had come up in this regard. | These comments provide an important background perspective. As the report is already lengthy and is focused on a path forward, CPJ did not include a detailed background section.

Outcomes 1 and 2 and the corresponding Outputs, Activities and Indicators address these concerns in part. We could flesh this out in the narrative section. |

| 57. Incorporation of global guidelines | The report should have the reflection of May 2020 IASC (Inter Agency Standing Committee) Interim Guidance on Localization and the COVID 19 Response. The guidance drafted by IFRC and UNICEF and approved by IASC, the highest UN policy body in respect of humanitarian response. So, this is an obligation for all actors. Important features of the report include:

(a) The guideline has clearly mentioned that "local government" is a critical actor in the process of localization. The present draft LTF consultant report hardly reflected this.

(b) There are seven distinctive key messages, (i) safety and well-being, (ii) responsible partnership based on equality, mutual respect, mutual accountability, (iii) humanitarian principles, (iv) support local leadership and active engagement in coordination mechanism, (v) flexible and simplified funding…as directly as possible, (vi) visibility must be given and (vii) build back better with development and peace nexus through meaningful partnerships.

The guideline explicitly mentioned that "Humanitarian leadership must be inclusive and work to support the entire humanitarian community and not only UN agencies and international NGOs which tend to be more visible "(page 4, para 1). Further in the report it is also said that "…should be encouraged to facilitate a more comfortable setting for local organizations to actively setting. This will include ensuring that the language of the meetings is accessible to local actors of cluster / sectors…" (page 4, para 4).

The LTF consultant should revisit the report based on the guidelines. While even the Grand Bargain September 2018 mission recommended to introduce "Bangla" as language in Cox's Bazar level. The LTF roadmap report make the recommendations more obscure and | We can bring the recommendations of the IASC report into our report due its relevance to the localisation discussion. Our desk review is the main document that reflects on global literature on localization; the roadmap is meant as a step toward specific policy formulation and operationalization and as such does not focus heavily on theoretical or general aspects.

The report does suggest that CXB-based meeting minutes should be available in Bangla. We also suggested that any training for the NGOs should be in Bangla. In addition, we said the call for proposals should be also in Bangla. We also said the communication with the Rohingya refugees should be in their own Rohingya language, but that translations into Bangla should also exist. We proposed an activity to develop certified Rohingya translators and interpreters to ensure quality.

The roadmap includes a vision for the local government's role in the process of localization.

The LD, if established, may have a Steering Committee. NGO representatives should be included in the Committee. |

	confused.	
	There are two national and local democratically elected NGO representatives in SEG and the participation has to be made meaningful. Since the beginning (September 2017) CCNF has been urging for participation of local and national NGO representation in ISCG and HoSoG at Cox's Bazar level, but it has not been happened. ISCG and HoSoG leadership approach of maintaining Separate Island should be replaced with a genuine inclusive approach, especially by giving more access to local and critical actors.	
58. Global localization framework	Localization is a political issue, a power shifting process, which fundamentally needs to be addressed within the frame of basic principles of GB, C4C and PoP commitments. It should be noted that the TOR (Terms of Reference) of the consultant which was approved by the LTF mentioned that the Grand Bargain (GB), Charter for Change (C4C), Principle of Partnership (PoP) commitment and the CCNF work in this regard should be the primary basis for analysis. Unfortunately, the analysis reflects very little of it. The report interpreted that localization campaign has been made as a political issue. In fact, localization is considered as political issue and a matter of power game, a process to shift the power to local actors. Whereas, the whole GB is a framework in this regard, especially the stream 1. Greater Transparency, stream 2. More support and funding tools for local and national responders, and stream 6. The participation revolution.	More and clear reflection and reference of Grand bargain workstream (GB), Charter for Change (C4C), Principles of Partnership (PoP) was asked by the reviewer and is possible. These are explored in lengthy detail in the desk review initially prepared for the study. The desk review also explores the political nature of localization as a power shift toward local actors that improves accountability and responsiveness toward affected populations. Due to the already-lengthy document, these frameworks were not explored in detail in the report. But we are happy to cite them where relevant and to point out how and where the report recommendations link to the global guidance. Incorporation of local and affected population in the decision-making process could be more thoroughly mainstreamed in the report if we feel that has not yet been done sufficiently.
	Localization means the local actors' and affected population's access to the decision making process of the response management. The report hardly addresses these issues, especially there are very little reflection on stream no 1, 3, 4, 5, 6, 7, 8 (amalgamated in latest GB update), and 9. So, the report has	

	become a mere technical report addressing the localization issue as a matter of funding and so called "capacity building" for the local NGOs.	
	There are 9 streams and 51 indicators in GB as updated so far. Since the beginning, CCNF has been analyzing it based on the commitments and provided opinions on what to do about it in Rohingya response. CCNF organized around 13 multi-stakeholder dialogues participated by high level policy makers from government, UN and INGOs. They published ten publications on it.	
	A matrix is given below on some primary suggestions to be examined by the LTF consultant.	
59. The report mentioned in page 5 and para 3: "Equitable opportunity – localization must also ensure that national and local staff prioritized for employment across all agencies and levels. One early success in Cox's Bazar is that Bangladeshis already comprise the large majority of the employees, though not enough are in decision-making role."	Employing local staff in international agencies is not localization. In view of all the internationally accepted charters (e.g., GB, C4C and PoP) related to localization, employing local or national staff in international agencies is not at all part of the localization. It will distract the reader's attention from power sharing, transparency, participation, accountability to the local actors and affected population, which is the basic essence of localization.	Good point to consider.
60. Technical assistance or expatriate employment, demand or supply driven	The LTF consultant should have a comment on this, while there are comments on staffing in international agencies. Neither government nor ISCG has any accurate data on how many expatriates is working in Rohingya response. During initial period it was said that there were around 1300	The LD can develop a database of existing consultants and their profiles. The TOR of the LD includes development of a database, searching for consultants based on proven complementarity and comparative advantage, and quality control of the consultancy. In short, the principle "value for money" will be applied here.

expatriate in Rohingya response. We have clear position in this regard.

We have some different practical experiences in this regard, while we have interacted on what should be done in respect of social cohesion, we had to challenge some wrong interpretations being provided by a group dominated by expatriates.

We are not against the expatriate involvement, but it should be (i) demand driven, need assessment should be done first, (ii) available local capacity / expertize should receive priority, (iii) if needed expatriate must be deployed with the clear time line based strategy on technology know-how transfer. Time has come to talk about such a policy as it is not only to cope with the reduce level of aid and it is also need to talk about technology transfer to locals. Rohingya response cannot be or should not be depended on expatriates even after 34 months of the response.

| 61. Capacity building related issues | Capacity "building" fallacy, partnership policy and investment in leadership. The report overwhelmingly emphasizes on capacity building. Sometime the report accepted the notion of capacity exchange. Here are two demystifications in respect of this capacity "building" fallacy.

Many of the international studies (especially by ODI HPG group) propose the issue of capacity convergence or exchange, accepting that the partner local organizations have also some inherent capacities like navigation through the local power structure and understanding the local culture etc. Donors / international agencies also have some necessary capacities. Both | As mentioned above, the roadmap's Output 1 is based on the concept of 'lifelong learning' both for individuals and organizations. This deviates from the classical view that capacities are a static, fixed set of skills.

The roadmap provides a scope for NGOs to self-assess their profile and if required can demand capacities or self-learn. During consultations, many local actors expressed their interest in ongoing capacity enhancement opportunities. The report emphasizes capacity heavily because this was the most heavily emphasized issue across all stakeholders.

Transparent Partnership Policy is a good idea that we can add to the report. |

of the sources of capacities should be in convergences.

Having capacities does not necessarily ensures to have funding or partnership with international agencies. COAST has been a HQAI (Humanitarian Quality Assurance Initiative), certified organization in Bangladesh and Cox's Bazar for long time. HQAI certifies organizations across the world after a rigorous process of audit on CHS (Core Humanitarian Standard) and ISO 2000 standards. There are only 21 organizations who have such a certificate. Several famous international agencies are yet to be able to achieve this while some of them are still on different level on the way to be certified. So, it does not mean that COAST has got all funding. There are widespread allegation of cronyism and corruption in partnership selection process. We have observed some cases in Cox's Bazar too. Moreover, some of the international agencies hardly want to entertain critical civil society voices which is the need of time. What is happening is the process of selecting "His Master's Voice" and re-production of patron client relationships. Some international agencies imported NGOs from abroad and from the far opposite part of Bangladesh, who hardly represents the local people and their culture.

So, we propose the international agencies to have "Partnership Policy" with long term vision, criteria based and must be selected through a process of transparent, competitive basis and free from conflict of interest.

The report has overwhelming emphasize on capacity building that promotes "Spoon Feeding" and defeats the spirit of "self-learning and self-made approach" of gaining capacity through learning and actions.

The report should have much more importance on the selection of leadership (i) with political commitment towards refugee and human right issues, and (ii)

	who have natural capacity of advocacy at different level. It should be noted that there are much more need of advocacy leader and CSO/NGO who are not only efficient in service delivery but also efficient in advocacy and community mobilization. Rohingya refugees need a lot of legal and quasi legal facilities from government and also need community support for peace building and social cohesion.	
62. **Pooled fund and Localisation Driver**	"We support the idea of "Pooled Fund and Localization Driver". We support these two ideas to facilitate localization in the Rohingya response. We have following recommendations for effectivity in this regard. (i) Integration as One Body, Bangladeshi Example. These two aspects have to be integrated as "one" body to promote local NGOs as CSO. There are examples in Bangladesh, Manusher Jonno Foundation (MJF), who promotes human right and governance in the country. MJF has a lot of success in respect of policy and practice changes in the country. So far it has been funding around 150 local organizations across Bangladesh being funded by DFID, CIDA and other donors. Initially it was anchored with CARE but within 1/2 years it has emerged as independent body. It has happened mostly because of committed and experienced leadership. (ii) Primary role to promote local CSOs in Cox's Bazar. CCNF was advocating since the beginning for such pooled fund to promote CSO (Civil Society Organization) in Cox's Bazar. NGO who also raise voice on civic rights, have natural capacity to mobilize local community and stakeholders should be termed as CSO, not the NGOs who only do service delivery. These distinctions have to to be understood.	We can review relevant parts of our report in relation to the examples cited by reviewers and reflect on it.

	There is a critical need of CSOs in Cox's Bazar to promote a human / refugee right sensitive society. Due to the heavy and direct presence of INGOs and UN agencies in Cox's Bazar since 1990, very few number of local NGOs have been established here compared to other districts. (iii) Initial anchoring and Governance. These pooled fund / localization driver should be placed with ISCG for initial period. There should not be any illusion on its anchoring with government as it has suggested by the report. UNHCR should be in its governing board, as it is the only mandated organization to take care of refugees. There should also be representation of local and national NGOs in this governing board.	
63. Sensitive quotes	Hearsay cannot be the basis of inference. The report should consider a proportionate and scientific approach. There are repeated number of negative aspects on local NGOs in the report, e.g., they are not capable, they do not maintain humanitarian principles, they have mismanagement etc. I feel these are a bit disproportionate. I have never seen such a propaganda placed in so directly in any report. The consultant listens to those both in Cox's Bazar and Dhaka as presented as hearsay and these should have been substantiated with evidences. I am afraid that, this aspect of report will have every chance to be used for anti-localization propaganda. I have following facts in this regard. (i) Since 1978 for Rohingya refugees and especially after the cyclone of 1991, the local NGOs in Cox's Bazar have been working with the partnership of INGOs and UN agencies in Cox's Bazar. Any of such open propaganda against local NGOs have never evidenced before. Rather, there have been a number of negative evidences against INGOs and UN agencies published in	Sensitive quotes will be removed from the text.

media, like there are such allegations especially on corruption in DR Congo. CCNF have never used those for any inferences.

(ii) The fundamental fact is, since almost all of the local NGOs has been working under the INGOs and UN agencies, it is also their responsibility if any mishap occurs.

(iii) Bangladeshi NGO/CSOs has been very active in localization campaign including PoP, GB and C4C movement both at local and international level. INGO who are not signatories of those agreements are found very active in such propaganda, most of those INGOs have succeeded in strong contract with UN agencies and strong presence in Cox's Bazar. They also did so called study to show that local NGOs are 'not respectful' to Rohingyas. This kind of study developed the inference based on four FGD, which cannot be considered as a scientific study. But, this message has been taken by this report.

(iv) Local NGOs, including their network CCNF, have had organized at least 13 multi stakeholder consultations since September 2017 where almost all high officials of UN agencies and INGO participated. These consultations were organized not only to promote localization but also to promote understanding and inclusive solidarity to promote human right / refugee rights in Cox's Bazar and the country. Still CCNF has been mobilizing campaign and advocacy e.g., statement with signature from local CSO, local media and national CSO for 4G internet for Rohingya Refugees in the camps, giving shelter and berthing facilities to boat people, Statement condemning the anti-Rohingya approach of Malaysian government etc. We hardly found any investment from any international agencies on it. So, we strongly believe that local NGOs played a pioneer role in this

regard. We feel there are some agencies working both in Dhaka and Cox's Bazar, who feel jealous and are creating this kind of propaganda against local NGOs.

(v) During the local youth movement in Cox's Bazar, some of our INGO friends in SEG alleged that CCNF campaign and position fueled that agitation. In fact, CCNF leaders are the one who gave statement in both local and international media against the movement and played important role to defuse the tension. So, there are deliberate attempt to vilify local NGO leaders.

(vi) Please also note that, it is the local NGO leaders who systematically We have study that, local NGO involved in partnership both in camp and host community has come down to 4 to 8%. We are afraid that this could be a common systematic process to oust the local NGOs off the total response.

(vii) We tried to discuss with international agency leaders in Cox's Bazar to develop reciprocal understanding. Ironically except UNHCR, none of the agency leaders have responded to the request to have meeting.

(viii) CCNF leaders tried several times to have bilateral meeting with present ISCG leaders especially to discuss on JRP and to develop reciprocal understanding. But the requests are either avoided or turned down. In the beginning, CCNF and local NGO leaders succeeded to receive invitation and got the scope of interaction to exchange with visiting international dignitaries, but during the present ISCG leadership, this has been fully stopped.

(ix) There is a unit named CARU (Cox's Bazar Analysis and Research Unit) who produce weekly report synthesizing the local print and online media reports and social media postings. In the header of CARU it is

	said that Partnership for Tolerant and Inclusive Society in Bangladesh. But our observation finds that, CARU reported negative news on local NGOs / CSOs and localization activists. They hardly reports positive news on them. On the other hand, they report generously positive news on the activities of international agencies. Once in a formal presentation they termed the localization campaign as alarming next to ARSA. We challenged its basis, but that was never responded. An approach of inclusiveness cannot propagate such a divisive information and conclusion. (x) Observation also shows that, ISCG twitter postings normally propagate good works and news of international agencies while they hardly reflect the work of local NGOs working in the camps.	

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