

JRP 2020 in Rohingya Response should be a real Joint Venture. Aid Transparency and Locally Accountable Management is a Need:

Strive for a System with Long Term approach, No More Thriving in Chaos

1. Our position: Striving for System

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

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

Taking all the above-mentioned perspectives into account, we propose a level of self-reliance of Refugee families in camps, formal education with Myanmar curriculum for human dignity, a level of decongestion by using prefabricated shelter in camps. Aid / humanitarian response should be anchored with locally sustainable organizations. i.e., local government and local NGOs. Aid / humanitarian agencies must show best possible approach of internal and external accountability of the response within the framework of all those agreements as mentioned above. Above all, we propose the sole authority of the government of Bangladesh with a rightful involvement of UN agencies. Coping with the reduced level of aid the important crosscutting issues should include but should not only limited to technology transfer to the locals only, there should be also peace building in response to the potential security and conflicting situation in future and appropriate level of environmental recovery. We believe that the refugee situation in Bangladesh is different from others, there is no armed. The local community were the first responders to the persecuted. So these positive elements could be used for localization of humanitarian response.

2. Single authority is needed for an Inclusive process and optimal use of resources

JRP 2020 is an under reported document and hardly a joint venture. There are number of agencies including local, national and international NGOs who do not report to the JRP. Even there have been hardly any reporting on the government's investment in Rohingya response in Cox's Bazar. ISCG is led by mostly expatriates from UN agencies and two INGOs. There is hardly any participation of representative of any local NGO or local government which has been the demand of CCNF since the beginning of 2017 influx. **Such a non-participation is happening as ISCG hardly has authority over any agencies** and provide access to all others especially local government and local civil societies. ISCG have to consider that why they hardly been able to provide vital statistics, e.g., how many local procurement have been done, how much money total being spend for host communities and how much local employment have been generated.

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

Functional relationship hardly establishes an authoritative relationship. JRP 2020 is just shared with them through some nominal workshop events. Since the JRP 2020 is a plan and has no authority, there could be some duplications. Now that there is a clear sign of dwindling aid situation and a growing concern of security and conflict. UN agencies need to consider the integration of ISCG in RRRC office, especially to strengthen its planning, monitoring, financial tracking, need assessment and control. At the end the government need to take full responsibilities of the response. **Primarily UN agencies might take the approach of strengthening the government capacities and 'counterpart approach', which is less costly and facilitates the technology transfer.**

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

Until such a system is in place, **we propose as interim measures as follows;**

- (i) **inclusion of local NGO across the sectors of ISCG leadership,**
- (ii) **access of local NGO and local government in HoSoG (Head of Sub Office Group) and ISCG meeting in Cox's Bazar,**
- (iii) **local NGO / CCNF leadership and local government leadership should give space to meet with visiting dignitaries or donors so that there will be a reflections of local people voice,**
- (iv) **introduction of Bangla language as the means of communication in the humanitarian operation in Cox's Bazar,**
- (v) **all the expatriates of UN and ISCG should be trained on Bangla language and cultural issues of the localities, and (vi) all the involved expatriate and staffs should be oriented on what is Principles of Partnership (2007), Grand Bargain Commitment (2016), New Way of Working (NWOW, 2016) Charter for Change (2016) and Global Compact on Refugee / Comprehensive Refugee Response Framework. At least all those expatriate and staff should know the background spirit of all those agreements, primarily which are accountability and participation to the local, aid transparency and anchoring with locally sustainable institutions.**

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

We have the following observations on JRP 2020 framework.

(i) Generally, problem or need analysis are considered as rationales in any planning document and then measurable terms in respect of intended objectives and impacts/ results are seen. Such **formulation is necessary for tracking the impacts / results**, especially by a third party. We hardly observe this in the planning document.

(ii) Both the **midterm review and need assessment done by UN and international agencies** hardly had any participation of local agencies. So those have lost the opportunity of integrating the local knowledge into it which could have been low-cost with longer term impacts.

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

All of these have happened only because of the absence of participation of local actors in the JRP preparation process.

It could have been a strength of the JRP 2020 or ISCG if the homegrown process/ institutions/ capacities were considered. Instead, NGO Platform (NGOP) is highlighted for the NGO coordination, which is hosted by DRC (Danish Refugee Council) and is formed out of FD (foreign donation regulation steered by NGO Affairs Bureau) process. It has to be abided by the government rules and it is dependent on foreign funding. But the JRP 2020 could have taken notes from CCNF which is a network of local and national NGOs and CSOs (Civil Society Organization) and is formed long before NGOP was formed. CCNF is quite active in promoting localization and peaceful co-existence with human right both at local and national level. CCNF is not dependent upon foreign funding still they organized around 13 public events and 10 grass root mobilization on these issues. Grand Bargain commitments recommends to **reinforce the existing institutions and capacities rather than creating new.**

We strongly recommend ISCG to include **three additional sectors**, i.e.,

- (i) **Peace building** especially to address peaceful co-existence, security and conflict issues. This sector should embody with two course of actions, social cohesion, education and networking on campaign against extremism and criminalization,
- (ii) **Environmental restoration** to promote conservation and regenerations. We believe that there are a lot of scopes and creativity available in this regard.
- (iii) **Host community sector** to ensure 25% of JRP to invest in host community and without any disproportionate approach. People have questions about it and therefore these component should not be kept along with preparing separate development plan for Cox's Bazar.
- (iv) We also believe that, **site management or camp management sector should give emphasize security issues**, and also
- (v) In **health sector, family planning issues should should get much more attention.**

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

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

- (i) **Rigorous sensitization on these GB, C4C and NWoW** among the top level officials and field workers of all involved agencies are needed. C4C feels that such an awareness is a fundamental.
- (ii) There should be a clear **differentiation of "National" and "Local" in view of IASC (Inter Agency Standing Committee) definition** as Bangladesh is the country of booming NGO sector. The importance in the Rohingya response should be given to local organizations, originated in Cox's Bazar or the leader belongs to Coxsbazar too. It should be noted that those NGOs who do not have such an origin they might consider to go out while there will be no funding and moreover they might have little knowledge on local power structure, which is needed to navigate to facilitate human right based protection. .
- (iii) Due to different reasons, especially operational presence of UN agencies and INGOs in Cox's Bazar since 1992s, the growth of local NGO in the district is lower than other districts. There are only 7 NGOAB (NGO Affairs Bureau) registered NGOs in Cox's Bazar but in other districts the number is more than 10. Therefore, we have been proposing for a **NGO Pooled Fund in Cox's Bazar** since the beginning to enable the local organizations to defend and stand for the human rights and refugee rights in future.
- (iv) We observed a tendency of **misinterpretation of localization**. Some are considering the appointment of local staff in international agencies is localization, but that is not. In fact, it is the matter of a level of role and control of local organizations and local government.

But meantime, **before going to the JRP 2020,**

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

5. Urgent need, Pre-fabricated structure for shelter, Self-reliance for Rohingya family and education.

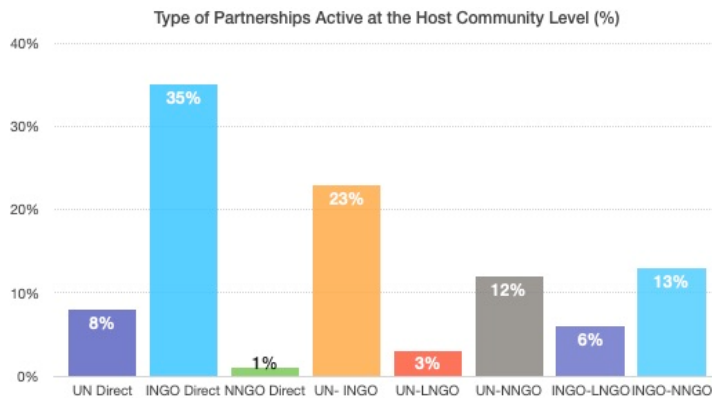
Our government has awarded with the name and fame for giving shelter to the Rohingyas which is a great reputation for the country and which will somehow impact the future course of development and international cooperation for the country. We also appreciate and feel encourage that government has allowed agencies for mid-level education for Rohingyas. **Although we the people of Cox's Bazar face the brunt of this, but we have to keep up the human face as offered by our Honorable Prime Minister.**

In line with this, **we urge to create scope to provide pre-fabricated structure in shelter** in the camps, which will save some spaces and release the congestion which is in fact the mother of all problems. The government should also allow some sort of **self-reliant activities for Rohingya families in the camps, so that** they will be less dependent on aid and above all they will be busy. We do not want "idle brain as devil workshop" especially they should not be lured with any criminal activities and terrorism. We have to note that any of such negative act will jeopardize government on going investment of development in Coxsbazar.

Donors should positively engage with our government, assist and assure funding in this regard. Bangladeshi civil societies are positive in this regard, they have already raised voice and as a result of their mobilization government has signed an agreement with UNHCR and positively respond to the ICC (International Court of Criminals). **Donors and international agencies should facilitate local CSOs for continuous and consistent advocacy in this regard as the locals know better how to navigate through the policy power structures.**

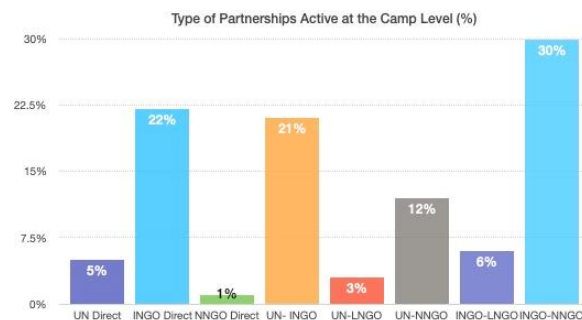
6. Dismal picture of localization: UN and INGOs need a declared Partnership Policy for Sustainable Rohingya Response and Accountability

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



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

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



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

We will make the detail findings of the survey later on.

This is a clear contradiction of policy declaration and in fact “Internationalization or aid business” approach in Rohingya response. UN agencies and INGOs need to keep commitment on what they have given in Grand Bargain, Charter 4 Change and NWoW.

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

We have been demanding for **NGO pooled fund in**

Cox’s Bazar to enable a planned effort to develop more NGOs based on human right and refugee right. If we can do so, more local civil society organizations will be developed and in turn it will be a sustainable and better protection for Rohingya refugees.

There are grievances from NGOs in partnership selection of INGOs and UN agencies which is hardly transparent, criteria-based, futuristic with sustainability, and competitive in nature. As there is a lack of Conflict of Interest Policies and easy accessible Complaint Response Mechanism among many of the international organizations, there are allegations of cronyism. In respect of media focus and visit of dignitaries, UN agencies and INGOs rarely recognized the role of NGO partnership. Most of the time it is sub-contractor agreements and imposition of a lot of unequal conditions which is not within the frame of Principle of Partnership (2007) and not within the frame of Charter 4 Change (2015). An equal relationship respecting mutual dignity is fundamental to promote responsible civil societies. **UN agencies and INGOs must have a declared Partnership Policy considering the Rohingya Response as a protracted crisis and to Promote a Sustainable and Accountable Local Civil Society in Coxsbazar.**

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

Approach toward the “Capacity” should be redefined, as Humanitarian Policy Group has proposed it should be “Capacity Exchange” rather than capacity development. Often it is said that local NGOs has lack of capacity, in fact which undermine the fact that, local NGOs has best understanding on local knowledge and navigation

capacity within the power structure and all above by nature they are accountable and they are sustainable in the locality. Taking the same perspective “Capacity Development” is top down.

7. A road to effectivity to efficiency: aid transparency to respect public accountability and progressive course of actions to reduce the cost

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

Funding Status of Joint Response Plan from 2017 to 2019

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

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

People’s general assumption is the management cost of UN agencies and INGOs is very high. One government high official said in a newspaper report that it is around 65%. Recently TIB (Transparency International Bangladesh) too has announced such an observation. According to the information from a government agency (January 2020) who track and take care of foreigners/ expatriates involved in Rohingya response, right now total 1,354 expatriates are working in Rohingya response.

We propose, UN agencies and INGOs should establish a system on their finance, vehicle and expatriate involvement and regular publishing of reports. There are general concern that, **there should be a planned effort for a Road to Effectivity to Efficiency and gradual technology transfer/ know-how transfer to the locals. And this is the process of gradual reduction of transaction cost of every dollar reaching to refugee families.** What are the **yearly direct input cost to refugee families**, what are **the management/ overhead cost** of fund and what are **the partnership cost**, we demand transparency of such information.

JRP has very little indication on the **plan of trying out to reduce the transaction cost though there are scopes**, e.g,

- (i) Almost all of the agencies have their own sub-offices established in Cox’s Bazar while they have offices in Dhaka. As there are 8 to 10 flights per day between Dhaka and Cox’s Bazar, agencies could consider whether they need such offices in Cox’s Bazar.
- (ii) Most of the aid workers and official live in Cox’s Bazar and go down to the camps on daily basis that takes four hours of their daily working time and moreover it is a huge burden on the small city. As in the most of other refugee operations in the world, the aid workers live in nearby areas of the camps, operational staff/ offices of the responding agencies could be shifted to Ukhiya.
- (iii) There should be coordination among UN agencies and INGOs on logistical arrangements. There are huge grievances among the locals on the availability of vehicles they travel to and on traffic congestion in the road to Ukhiya.
- (iv) Staff salary in the response program is around 167% above than the normal disaster response and NGO structure in the country. Policy makers have to think on whether such level of salary structure is sustainable for the future and
- (v) There are also possibility on reducing expatriate involvement in the operation. In fact there are no study to determine whether and how much the expatriate positions are needed. There are hardly any process of technology and know-how transfer to the locals.

The End

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

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

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