

2nd February 2022

Subject : **“Reform sectors before rationalization of NGO involvement”** Comments on
“Principles of Rationalization” circulated in NGO Platform 30th January 2022.

1. We do agree that rationalization of humanitarian NGO dispersion among the camps, is also necessary to ensure equal level of services for all refugees. This is also necessary to cope with reduce level of humanitarian assistance.
2. We also feel that role of sector is also necessary for coordination of the service agencies so that refugees will receive services with a level of standard.
3. Rationalization group has prepared some draft principles in this regard. If we correctly understand there will be a or a controlling role of sectors aiming for (i) NGO dispersion and (ii) ensuring equal level standard for service. Following strategies will be implemented in this regard.
 - If an NGO want to work in the refugee camps that have to be accepted by sectors,
 - NGOs have to be member of PSEA network,
 - NGOs have to maintain a level of standard. Standard could be defined in two approach, i.e., humanitarian response standard and standard of level of services that they are providing,
 - NGOs have to have a level of funding predictability from her donors.
4. We have following concern in this regard as follows;
 - These will be difficulties for the local NGOs who are providing service in the camps, but they have little of participation in sectors meeting, as they have little of manpower for participation in sector meeting in Coxsbazar. Moreover they have hardly capable staff who is able to communicate in English.
 - We propose reform in the Sector, in this regard, at least in two level, i.e., in respect of lead, sectors should have joint leadership, and at least a co-chair should be from local NGOs. And the sector meeting and it's all communication in Coxsbazar level should be happened in Bangla.
5. Maintaining standard (e.g., core humanitarian standard promoted by CHS Alliance), is a costly matter, even getting certification in this regard is also costly matter. Only Bangladeshi local NGO COAST have the certificate in this regard from HQAI (www.hqai.org), annually they need to cost as fee around \$2000. INGOs and UN agencies who are partnering with local NGOs, they have to take capacity development project in this regard.
6. We feel there are following possible contradiction are there;
 - There are little of participation from government agencies, they have a level of standard as they provide services. Setting service standard should have conformity with them too.
 - NGOAB are not bound to listen from the sectors, if a project is being approved by NGOAB and also by RRRRC, then how the sectors will bar in working in the camps. Sectors should have link with NGOAB and RRRRC office. Officially DC is the responsible for implementation of NGO projects.

7. We have been urging to make the JRP as a live documents and to maintain flexibility, especially to facilitate access of local NGOs, so that if even middle of the year, if any NGOs manage fund, then they should have the scope to work in camps.

 8. UN agencies and ISCG in Coxsbazar, hardly follow IASC (Inter Agency Standing Committee) definition of local and national NGOs. Most of the time UN agencies in Bangladesh use the term of “Bangladeshi”, then they create confusion in this regard. NGO who is originated in Coxsbazar and whose leadership is from Coxsbazar, they should be considered as “Local” NGOs. They will not leave Coxsbazar if they do not have funding. NGOs who is originated in outside of the Coxsbazar districts and come here for the response, sure they will leave the district if there is no funding. These line of definition have been taken by road map on localization as proposed by Localization Task Force, which was proposed by SEG (Strategic Executive Group) led by UNDP and IFRC. In fact, it is not in implementation.
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