



A common vision, a shared mission:  
**CARE reflections and recommendations on  
EU humanitarian aid and partnership**



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*“By the year 2020, the world’s population will approach 8 billion with an increasing number and impact of natural disasters due to climate change, heightened vulnerability of disaster-prone areas, and accelerated growth and settlement of populations in urban settings, coastal areas and in marginal housing. Complex political situations will continue to impact upon vulnerable groups with increased tensions arising from prolonged chronic poverty, lack of availability and access to natural resources and increased inequality. Poor governance and failed states suffering from acute conflict will also be inextricably linked with humanitarian crisis with increased insecurity for humanitarian aid workers, affecting our ability to reach those most in need. At the same time, vibrant civil societies and strong and assertive national governments, with thriving private sectors, will have emerged in many parts of the increasingly multi-polar world.”*

*(Extract from CARE Humanitarian and Emergency Strategy 2015)*

This is what we need to prepare for as humanitarian ecosystem, including NGOs, UN agencies and donors. As a framework for this challenge, the former UN Secretary-General’s **Agenda for Humanity**<sup>1</sup> defines five workstreams:

- Prevent and End Conflict
- Respect Rules of War
- Leave no one behind
- Working differently to end need
- Invest in humanity

All of these are relevant for the EU as a whole<sup>2</sup>, and for the European Commission’s Humanitarian department (DG ECHO) in particular.

Linked to that Agenda is the **Grand Bargain**<sup>3</sup> on humanitarian financing, which is an agreement between more than 30 of the biggest donors and aid providers to get more means into the hands of people in need. It includes 10 workstreams, many of which we touch upon in the sections below.

### **What does this mean for one of the largest donors in the world, DG ECHO?**

While in this paper CARE reflects on challenges and opportunities that this new policy agenda puts forward and what we expect from ECHO in this context, we believe it is as **crucial to cherish and maintain what works well**. What ECHO is known for, both by other donors and by partners, is its commitment to International Humanitarian Law, humanitarian principles and needs-based decision making. This stands in contrast with national donors, who often have more bias and politicised decision making. Therefore this focus on needs and forgotten crises is a key added value and comparative advantage of ECHO that should be kept.

Another key aspect is ECHO's worldwide network of field experts. In fact, the monitoring and evaluation by these experts is very often relied on by other donors. As such ECHO not only provides an essential service to the entire humanitarian donor community, it is also one of the strongest donors when it comes to quality and accountability. In addition, what is key for operational agencies like CARE, is that ECHO expert staff provide space for a real operational and open dialogue, as the staff knows the context intimately, and we can together look for solutions to operational problems that may arise. We speak the same language. That kind of partnership approach is unique and invaluable.

Moreover, the fact that ECHO places a lot of importance on participation in Humanitarian Country Teams, global and national clusters, is important as it allows for better-informed coordination among donors, while at the same time they hear first-hand what the needs are and can play a mediating role (e.g. between UN and NGOs, or with the national government), as well as an enabling role (for example by financing flights, security coordination etc.). There has also been a consistent choice by ECHO to fund a variety of NGOs across Europe, and spend the largest percentage of EU humanitarian funding via NGOs rather than through the UN and Red Cross, which again stands in contrast with many national donors.

At the policy level, ECHO has been a leader when it comes to gender in emergencies, via the introduction of the Gender-Age Marker, but also on Disaster Risk Reduction (with DIPECHO), and on resilience (with SHARE & AGIR).

In all of these areas ECHO has unique capabilities, with a clear added-value and a comparative advantage to Member States. Unfortunately, on a number of these points, such as needs-based decision making, attention for forgotten crises and partnership, we have seen ECHO regress in the last few years, due to a combination of a focus on efficiency/upwards accountability and hence increased risk aversion, decreasing staff capacity leading to decreasing transparency, and increased politicisation, which we also touch upon in the sections below. Therefore CARE strongly appeals to ECHO's top leadership to rectify this regression, building on existing strengths when implementing the 'Agenda for Humanity', rather than side-lining what works well.

### What we like and what should be kept:

- Respect of **International Humanitarian Law**, including the **humanitarian principles** of humanity, independence, neutrality and impartiality.
- Implementation of the **European Consensus on Humanitarian Aid**-including the commitment that humanitarian aid is not a crisis management tool.
- A continued commitment to **fund a variety of NGOs** who represent a broad range of society and expertise.
- The effective use of the **gender and age marker** for all projects, through-out the project cycle.
- Commitment to **forgotten crises**.
- Continued investment in a field-based network of independent **ECHO experts**.
- **Open, solutions-oriented dialogue**.
- Continued leadership on **Disaster Risk Reduction** and efforts to ensure a linked-up approach with DGs DEVCO/NEAR to enable resilience building in protracted crises and situations of protracted displacement.
- Mediating and enabling role between various parts of the humanitarian eco-system in-country.

### What we would like to see different in the future:

- A strengthened, genuine **partnership** approach, in the spirit and letter of the FPA, which leaves the decisions on details of programming to the partners.
- More focus on an **effective, principled response & accountability to affected populations** (which relates to the life, death and dignity of people) **and less on taxpayer accountability** (which is about transparency and assurance that your tax euro is well spent).
- **More predictable and multi-annual funding**.
- Real commitment to implement **localisation**, including in Human Resources.
- No forced **consortia**, allowing partners to work with self-selected allies that will improve the overall response.
- In line with the EU Gender Action Plan (2016-2020), gender-blind projects need to be justified and every desk officer should proactively discuss the **gender marker** with the lead contractual partner at various stages of the project. Moreover, impactful **gender mainstreaming** requires investment and expertise, and should thus be **budgeted and funded**.
- Better **risk-sharing**, more **flexibility** and adaptive programming, to enable programming for resilience and the humanitarian-development nexus, while preserving the mandates of both sectors in line with the Lisbon Treaty.

# HUMANITARIAN PRINCIPLES

Respect for International Humanitarian Law (IHL) is key, not just for ideological reasons, but also because it is the only way to be effective in humanitarian response<sup>4</sup>.

At the global level in the World Humanitarian Summit, as well as at European level in the Lisbon Treaty and the European Consensus on Humanitarian Aid<sup>5</sup>, the EU has committed to uphold IHL and the principles, which is also a key element in the Agenda for Humanity. So in terms of policies and narrative, we are all on the same page. But of course what matters most is implementation.

On a daily basis, in line with the **EU Comprehensive Approach**, ECHO sits around the table with other EU actors, whether development, political, security, military or migration colleagues, to explain the humanitarian perspective and share their analysis. There is however a constant challenge to ensure that coordination does not result in a subordination of humanitarian aid to other political objectives of the EU and a loss of principled decision making by ECHO—an **instrumentalisation of humanitarian aid**. The ‘in but out’ approach as former humanitarian Commissioner Georgieva called it, is turning out to be rather challenging in an environment that constantly drives towards closer coordination in the name of efficiency and EU visibility.

Both in the framework of the Grand Bargain and the recent EU Resilience Communication<sup>6</sup>, the EU and ECHO are striving towards a more **coordinated analysis and joint needs assessment**. This is to be applauded, as taking into account a broader cross-sectoral analysis of strengths, vulnerabilities and pressures, can lead to better seeing the gaps, and more informed and evidence-based decision making, ensuring we are truly impartial.

CARE **supports the ambition of a coordinated needs assessment over an ambition for joint needs assessments**, which can be useful but which can also impose risks around groupthink and political manipulation of need analysis. Discussions on how to outsource the single assessment to consultants/private sector or a single agency, rather than joining together the perspectives of all operational agencies, are unhelpful. If needs assessments and therefore linking up with populations to identify the most vulnerable become disconnected from programming, it would both **break the independence of humanitarian agencies**, and **break our connection with the populations** we seek to serve. This is not acceptable and ECHO should ensure both options are considered, depending on the location. Already now, CARE is experiencing in some cases severe pressure from ECHO to (not) work in certain areas or activities, which we have pushed back on in order to follow our own assessments of needs and ensure we are independent rather than ‘donor-driven’.

In the same vein, the **single country assessment** proposed in the EU Resilience Communication can present benefits, but it can also lead to undue (open or covert) pressure on ECHO to prioritise certain geographical or thematic areas, whereby ECHO would lose its crucial independent decision making. While an overall focus on human security in all European actions would prevent this, the reality is that other **political imperatives often overtake this people-centred approach**. From experience with the NATO comprehensive approach in Afghanistan or the UN integrated approach in Somalia, we know the very detrimental and long term impact that the politicisation or militarisation of humanitarian aid can have on humanitarian response, including the security of humanitarian workers.

In an age where **information about humanitarian response travels incredibly fast**, if one humanitarian actor **compromises the humanitarian principles** of humanity, neutrality, independence and impartiality, it has an impact on the other humanitarian actors in that area, and potentially around the world. With

its position as independent humanitarian donor, ECHO has had successes in seeking to secure greater humanitarian access for its partners by negotiating with the relevant parties. However, there are also negative examples. The leverage and power which ECHO granted to the Greek government over the response by its partners in **Greece** was unprecedented, and harmful for operations, not just in Greece but also in other parts of the world: governments have started asking for the same level of control to approve projects and over elements of project implementation as was granted to EU Member State Greece. Violating the humanitarian principle of independence comes at a cost, and one which cannot easily be contained.

A key added value of ECHO has always been its focus on **forgotten crises**, which in the past was based on a dedicated 'Forgotten crises assessment'. ECHO has a comparative advantage in this field, as Member States have always been more driven by particular historic connections and political positioning, in a way ECHO was able to rise above. However, in the last two years, we have seen increasingly politicised decision making in ECHO. While the needs in the Syria region are indeed great, and the funding going to Greece is from a different budget line, it is nonetheless a fact that the funding going to Turkey and Greece is disproportionate compared to the humanitarian needs in other countries, such as South Sudan or Yemen. CARE expects ECHO to refocus its attention to forgotten crises, and base its **funding** decisions on **objective needs-based criteria**.

Where we have seen considerable progress at EU level is in the understanding of humanitarian aid by EU military and civilian missions and **humanitarian civil-military coordination**, which is due to significant investment of resources by ECHO over a number of years, including involvement in negotiations, in definition of mission mandates, and EU training of troops on IHL. We expect the same level of investment prior to deployment of EU Battle Groups. As their mandate is based on the Petersberg Tasks, which includes an objective on delivering humanitarian aid, it is crucial for ECHO to remind the EU that any use of Military and Civil Defense Assets (MCDA) has to be based on the Oslo and MCDA guidelines, which prescribe the use of these assets as a last resort in situations of natural disasters and conflict.

We risk going in the wrong direction when it comes to EU **counter-terrorism legislation**. Humanitarian NGOs operate in many regions and countries, where persons and entities designated as "terrorist" are present, for example in Syria, Iraq, Turkey, Palestine, but also India, the Philippines and Colombia. Designation of groups as "terrorist" is frequently a political rather than an objective statement. Providing assistance and protection to affected populations is incredibly challenging in these environments. Now that discussions have started at EU level, it is important that ECHO, together with its partners, highlights the negative impact that counter-terrorism measures can have on humanitarian aid and the humanitarian principles in particular, but also how humanitarian actors understand risk and the existing measures they have taken to mitigate those risks. CARE welcomes that the final document of the EU supranational risk assessment (EU SNRA) successfully incorporated the majority of concerns of humanitarian NGOs. Since a new SNRA will be released every two years, it is crucial to ensure the concerns of humanitarian NGOs continue to be heard as the Commission and Member States now seek to implement the recommendations of the report.

When it comes to the role of the **private sector** in humanitarian aid, everyone agrees they have a role to play, and a role beyond their corporate social responsibility (CSR) components and foundations. As a humanitarian actor, CARE works with the private sector for procurement, but there have also been opportunities where working with local or international businesses has been key to reach our

humanitarian goal. For example, to reach some of the most remote communities in Pakistan after the massive floods in 2010, CARE partnered with a local bank to get funding to them via their local ATM. But just like in development cooperation, defining the criteria and potential limits of the private sector's involvement in humanitarian response, for example in technical assistance, is very challenging. Companies might be quicker and more flexible, but at the same time, certainly in the case of international companies, tend to be less well connected with and attuned to populations, cultures and sensitivities. Moreover, by definition, for-profit organisations have a different end goal than non-profit groups, whereby the people most left behind and the long-term impact of their interventions do not come first. Finally, we would question whether funding directly the private sector (as well as other actors such as local authorities), could in fact compromise humanitarian principles, as again the private sector would not be bound to the same principles and ways of working as humanitarian actors. At a minimum, we expect a do no harm approach and due diligence. FPA partners should work with the private sector when it clearly adds value to achieve their humanitarian objectives, so the humanitarian principles come first.

A more recent challenge comes from the European states' focus on **migration**. Increasingly European donors are reaching out to humanitarian agencies to assist in response with refugees in Europe or (forcibly) repatriated refugees and migrants. If we help these people, do we then make it too easy for Europe to expand this approach, seemingly supporting this agenda or at the very least absolving the state of its responsibility? Or do we refuse, thereby potentially endangering the lives and dignity of people in need? A very difficult trade-off, to which we have not yet found a response as a sector, and which is also relevant for ECHO and its partners to debate.

#### **Recommendations:**

- **Respect the independence, neutrality and impartiality of humanitarian action**—not just in policy but also in practice, including in the EU migration agenda. Ensure that subsequent policies, institutions, funding and public communications by EC policy makers respect this distinction.
- Refocus attention to **forgotten crises**, and base funding decisions on **objective needs-based criteria** rather than on political pressure.
- Ensure coordinated **needs assessments**.
- Consult with civil society, including women's groups, to define priorities and strategies so as to ensure that the resultant programming responds to the needs of communities.
- Ensure EU respect for **Oslo and MCDA guidelines** on the use of Military and Civil Defense Assets in humanitarian response.
- Ensure that **counter-terrorism policies** and operations are consistent with international humanitarian and human rights law. Humanitarian agencies should be permitted to deliver life-saving assistance to communities in need on all sides of a given conflict. Counter-terrorism policies which obstruct such access should be revised.
- When working with the **private sector**, the humanitarian principles come first, and as a minimum there needs to be due diligence and a do no harm approach.

## PARTNERSHIPS

CARE greatly appreciates the principled commitment of ECHO to work with a diversity of partners, as well as the exchange on the partnership via the FPA Watch Group. Moreover, when it comes to programming, over 24 years of partnership with ECHO, CARE has had numerous positive contacts, both in Brussels and in the field, where we discuss problems and solutions and receive support from ECHO Technical Assistants and Desks.

What we have noticed in recent years though, is an **increasingly top-down approach** rather than a genuine effort to form balanced partnerships despite the inherent power imbalance between donor and recipient. The buzz word for ECHO is to **improve efficiency**, which includes results-based programming. While no one denies the importance of efficiency given the tremendous humanitarian resource needs, in practice an ECHO focus on efficiency at all costs has led to a decreasing commitment to the principle of independence and transparency, a lack of appreciation for the issues partners face in often very difficult conditions on the ground, and very directive involvement in operational planning.

Furthermore, there is a strong tendency within ECHO, as well as with other donors, to have a **smaller number of partners with bigger contracts**. One reason behind this is staff cuts within ECHO, leading to less capacity to manage grants. Having fewer larger grants or using financing mechanisms that transfer decision making to UN or other grant making agencies (e.g. Start Network) is considered a cost-reduction measure. As part of this effort, ECHO is increasingly requiring partners to work in **consortia**, where the operational challenges such as the financial risk and the coordination costs are carried specifically by the lead partner (but these coordination challenges are also reflected on the non-lead partners). This is not adequately considered or compensated by the donors. When assessing the costs of these financing mechanisms, donors should look at costs and benefits of the whole transaction chain from initial donor to implementing partners rather than just those at a donor headquarters, or a single agency.

To note also is that ECHO has a **tendency to work with the same partners**. All depends on relationships built up with desks, rather than transparent criteria and processes to select partners, as also noted by the European Court of Auditors: *“The key stages of the selection process should be clearly documented in order to show that the most appropriate proposals are selected and to ensure that the selection process is transparent.”*<sup>7</sup>

### Recommendations:

- Recommit to a **diversity of NGO partners and the maintenance of a diverse humanitarian ecosystem**.
- Uphold and promote respect for **the Principles of Partnership**<sup>8</sup>.
- Maintain the **spirit of the Grand Bargain** where donors, UN agencies, Red Cross Red Crescent family and NGOs jointly agreed on a deal and should therefore work in a collaborative manner on its implementation and uphold their side of the bargain.
- ECHO and its NGO partners should seek a **joint understanding** on what **efficiency and effectiveness** means, based on concrete field evidence and including equitable risk sharing between ECHO and its partners in the future.
- **Use the IATI standard** to gather data on **efficiency** of funding mechanisms and recognize the real costs of delivering professional humanitarian aid.
- Encourage a **coordinated approach between partners** rather than forcing partners to work in a **consortium**; if partners are willing to work in consortia, share the financial risk between partners and recognize the costs of consortium coordination.

## Ways of working: efficiency, simplification, speed & flexibility

When lives are at stake, quick decision-making on funding is essential. Therefore, systems used should support the **speedy** and efficient targeting, contracting and delivery of humanitarian aid. Predictable pre-selection mechanisms and application procedures can be helpful. However, their formats have to be better tailored to NGOs and humanitarian contexts, while contracting should be done with minimum delays. At present it takes too long to get an ECHO contract, sometimes up to several months. Even if most of the time informal discussions with the Technical Assistant in the field and Desk in Brussels ensure a tentative agreement on a contract, there is still a financial risk as the NGO starts spending money without a contract. This causes frustration for ECHO, who see this as slow starting. Contracts and funds should be issued more quickly.

Speedier allocations would also increase **efficiency** for both ECHO and the partners. However, efficiency seems to be defined primarily in terms of the quantity of people reached and reporting to political decision-makers and taxpayers. Much less attention seems to be paid to whether the most vulnerable are reached, whether there is accountability to populations and whether grassroots **civil society** is included in the **development, implementation and review of humanitarian programming**. For example, blanket distributions address the demand for quantifying the number of people reached but reaching the most vulnerable may take more deliberate actions to identify and to reach them, and to put in place specific measures to do so, such as ensuring gender-balance in assessment teams and specific arrangements for distribution. Notions such as **results-based management** have been introduced, whereby projects that do not manage to reach the intended number of beneficiaries can be fined up to 10% of the value of the project. Efficiency and a result-based approach can have positive outcome in humanitarian aid *as long as ECHO commits to less earmarked funding and gives its partners more flexibility* in the management of their projects.

What would certainly increase efficiency in our view, is greater **simplification of reporting and harmonised reporting formats between donors**. Reporting to various donors has become such a specialised activity that it takes ever more time away from operations, and requires additional, dedicated capacity (including staff) within NGOs. Even if donor reporting is likely to remain an expert staff activity, donors should at least ensure not to ask more than strictly required for project management and accountability to taxpayers, as well as streamlining their requirements which will also improve coordination. At present, no other humanitarian donor is as demanding as ECHO when it comes to reporting, so the harmonisation should not take the ECHO Single Form as the standard.

We are encouraged to see the push for simplification and harmonisation as part of the Grand Bargain workstreams and as a key principle in the revision of the EU Financial Regulation. However, there is a large **risk that more levels of reporting are added via other processes**. Through the other workstreams in the Grand Bargain, it seems that more reporting requirements are coming up (FTS, IATI, Centre for Humanitarian Data, cash reports, etc.). And at EU level, the EU is also working on counter-terrorism provisions (see section above), while factions in the parliament are increasingly scrutinising EU funding to NGOs.

A basic requirement for effective humanitarian programming is that it is adapted to the context. But by definition humanitarian contexts are fluid and change regularly. Floods or earthquakes erupt, a violent conflict breaks out and certain areas urgently need assistance while others become impossible to reach etc. Moreover, monitoring and evaluation or contact with the affected population may require a change in plans, in line with their expectations and our accountability towards them. All this requires a certain level of **flexibility** (e.g. the inclusion of a “crisis modifier” mechanism) from the

donor side (and us); this would definitely help improve the effectiveness and efficiency of humanitarian actions.

At the same time, some crises are highly predictable or indeed chronic. In these situations, annual funding cycles make very little sense as it does not allow for thinking long term to build resilience and the predictability of funding that this requires. **As agreed in the Grand Bargain, multi-year financing** and planning is the way to go for protracted crises, including protracted displacement, on top of funding for new or worsening crises. This includes having more transparency around ECHO's funding and priorities for such recurrent crises, but also enabling the connection with different EU funding instruments (i.e. DG DEVCO, DG NEAR and Trust Funds) also present in those contexts, including a possible administrative harmonisation among them. However, it remains critical to understand that protracted crises are still humanitarian contexts, with the level of risk and context changes that this entails. While seemingly obvious, this implies that in such contexts, normal development funding rules cannot apply, and flexibility is key.

When a disaster is predictable (such as El Niño), **anticipating funding** is very helpful, as it allows agencies to prepare and respond much faster once the disaster strikes. Therefore we would suggest that a section in the Single Form gives the possibility for partners to flag potential changes that might come up, that would then allow for the flexibility required for adaptive programming.

#### **Recommendations:**

- Seek a joint understanding between ECHO and its partners on what **efficiency and effectiveness** means and how risks should be shared between ECHO and its partners in the future.
- Carefully balance the **result-based approach** with humanitarian specificities, as a sole focus on results might lead partners to be more risk averse (in terms of access to most difficult areas).
- **Simplification:** Engage in the piloting phase of the new simplified reporting format coming out of the dedicated Grand Bargain workstream.
- **Speed:** Explore spreading the contracting process over the year to avoid the concentration of submissions in January (which does not make sense for projects starting in the second half of the year, as the situation might change substantially). This will allow more efficient and speedy financing and avoid duplication of work for both ECHO and partners.
- Define a **light and quick procedure for project amendments** not affecting the overarching objectives.
- Enable greater **contractual flexibility** for partners to respond to rapid onset emergencies.

## Localisation

Localising aid is defined *as a shift from international to national/local leadership of humanitarian response*. The intent is to bring ownership of humanitarian action closer to those receiving and delivering aid. Enshrined in the Grand Bargain, it calls for making aid *“as local as possible and as international as necessary... engaging with local and national responders in a spirit of partnership and aiming to reinforce rather than replace local and national capacities”*.

In the drive towards more local ownership of humanitarian response, the **role of women's organisations** is critical and one in which CARE places considerable emphasis. It cannot be assumed

that initiatives promoting the role of local institutions in resilience, risk reduction, preparedness or humanitarian response will automatically result in an inclusive or community-based approach, let alone ensure the participation of women and girls. Women's equal participation and empowerment should thus be integrated explicitly into any new mechanisms to strengthen the role of local actors in humanitarian action.

While ECHO regularly has referred to the **EU Aid Volunteers** as their contribution to localisation, this **does not correspond sufficiently to or address our view of localisation**, as these are European experts flown in for a certain amount of time, lacking exactly that embeddedness and long term presence in the local community that is needed for effective local response. Moreover, it repeats the patterns that promote Northern experts taking the space and resources that should be more directly allocated to the South.

At present, the increased scrutiny of aid budgets encourages donors to implement payment by results and in arrears. This financial burden is rarely manageable by agencies with low turnover and cash flow, which can be contradictory to localisation. Moreover, beyond external constraints, the **culture** inside ECHO also needs a substantial overhaul to allow for localisation. ECHO should assess **obstacles and opportunities** to partnership and localisation within its own house and propose avenues for becoming more 'fit-for-partnering' – from culture to policies and systems, skills and support, leadership and resources. An important hindrance even for international NGOs, is for example ECHO's insistence on FPA holders to monitor all project activities through expatriate staff, ostensibly to maintain neutrality, but in practice an obstacle when we have very experienced local staff in place, who can travel and conduct M&E in contexts in which an expatriate, including an ECHO Technical Assistant, cannot. In fact, when CARE has local staff in senior positions, it is considered remote monitoring, which is a view with which we strongly disagree. In addition, ECHO should grow the habit of **consulting** with the key local organisations when developing **programming and new policies**, pulling them into the conversation, in addition to FPA partners. This kind of cultural shift is possible, and we appreciate ECHO's creative thinking on what is possible within the legal framework to respond in challenging contexts, such as the flexibility around remote monitoring in Syria.

We recognise the limited capacity of ECHO and the constraints in the ECHO legal basis, the 1996 Regulation, which does not allow ECHO to finance non-European NGOs directly. Still, innovative ways to promote localisation could be explored. At a minimum, the extent to which an activity supports local response capacities and actors should be a **key question in project design and a criterion for selection** of proposals. Agencies seeking ECHO funding could for example be asked to conduct an assessment of local capacities in the area where they plan to work and articulate how they will build on existing capacities, or to commit to pro-actively engage with local organisations; or it might mean focusing on capacity building of local government in other cases. Localisation will look different from one context to another.

**Capacity building** of local organisations is key. This is not just a one off-training; it requires accompanying the organisations over time, building their institutional capacity with sustained investment to enable them to respond to emergencies at the scale and quality required. This needs to happen as part of preparedness, ideally thus in peace time or well in advance of disasters occurring. At present there is a large gap in this regard, as development donors are not looking into capacity building for humanitarian response, whereas humanitarian donors tend only to fund the costs of specific operations. Therefore we recommend a double approach. On the one hand, from

humanitarian donors, we expect, as a minimum, **flexibility on HR-staffing**, trusting partners to get the right experts in, at the right time, regardless of nationality. Moreover, more flexibility is needed to include capacity building components in humanitarian financing proposals. On the other hand, CARE would recommend the set-up of a **multi-donor Facility that funds capacity building and preparedness of local organisations for humanitarian response**. This would ensure a more coordinated approach to capacity building, doing away with examples whereby the same local organisation is trained by multiple international agencies on the same issues. It would allow both development and humanitarian donors to be engaged beyond specific contracts, in a coherent and sustained manner, and would ideally be locally-driven, as local organisations would determine for themselves what they need.

ECHO could pilot funding to locally-led approaches that are contextually appropriate, meet compliance requirements and have potential for large scale replication. For example, it would be interesting if ECHO could make funding available in a central pot, in the same flexible way as is done for the Disaster Relief Emergency Fund (small silent disasters), to fund rapid assessments by local organisations. This is clearly their comparative advantage, and it would allow for a much quicker and contextually-appropriate response by all agencies.

#### **Recommendations:**

- Add **localisation as a key selection criterion** when reviewing proposals. Insist partners work with local NGOs where they are better positioned to deliver, by including local organisations in projects and consortia as full and equal members.
- Allow for more **flexibility in staffing**, including local staff.
- Support the set-up of a multi-donor facility that funds **capacity building** and preparedness of local organisations for humanitarian response.
- **Fund pilots** to test and hone locally-led approaches, for example via funding rapid assessments of local organisations, pooled funds that are directly accessible to local actors, or consortia of local actors.
- **Track** how much ECHO **funding** goes to local NGOs, whether via pooled funds or indirectly via FPA partners, so ECHO can annually and in a transparent way demonstrate its commitment to channelling 25% of funding to local organisations by 2020, based on definitions (to be) agreed as part of the Grand Bargain localisation workstream.
- Strengthen partnerships with and increase **multi-year and flexible funding to local women's organisations**.
- **Partnerships between local women's groups and humanitarian agencies** should be fostered to promote learning in both directions and leverage these partnerships to become drivers of change for women's participation, gender equality and gender-based violence prevention and response in each sector.
- Actively work towards an **internal culture shift** on working with local actors, getting less risk averse, and pro-actively seeking the views of local actors in how to work out localisation, and when defining new policies and programming.



## GENDER AND PROTECTION

Conflicts and natural disasters impact differently on men and women, boys and girls. Women and men respond differently in efforts to resist violence, survive and support their dependents, bring different issues to the table, and have different needs in the aftermath of crises. In addition, disasters change power dynamics at all layers of society, and also gender roles change, across age and over time. Whilst there is broad, rhetorical support for gender programming in emergencies, in practice many actors are still working gender-blind, without considering the specific needs of women, men, boys and girls of different ages, or even collecting sex-and-age disaggregated data (SADD)<sup>9</sup>. The ‘tyranny of the urgent’, seeing a crisis as something to measure in volume and tonnage of ‘goods’ to deliver as well as a continued lack of understanding of protection and gender mainstreaming, continues to impact the **quality and consistency of sectoral programming to mainstream protection, including gender**. However, as Feinstein’s groundbreaking research in 2011<sup>10</sup> demonstrated, without responding to gender needs, operations are simply less effective. Even worse, if we dismiss gender issues in emergencies, we risk negatively affecting the communities we are supposed to serve and being discriminatory in the delivery of our programming. CARE has seen that progressive rapid gender analysis<sup>11</sup> works, as it allows humanitarian sectors be much more deliberate in their actions and activities to reach women, girls, boys and men of all ages and backgrounds equally and based on specific needs.

We applaud **ECHO** for having adopted a **gender-age marker and a strong gender policy**. However, we observe that ECHO’s gender policy is only translated into practice and thus into impact throughout the programming cycle if the relevant geographical desk or Technical Assistant has an interest in it. Genuine **implementation remains personality-driven** rather than a key organisational imperative.

Furthermore, it is essential that the whole humanitarian community, including donors, recognise that ensuring **impactful gender mainstreaming is not free**. Donors, including ECHO, often seem to assume that the application of a gender marker itself is the solution. CARE has experienced cases where ECHO

took the small budget allocated for gender advisors and analysis out of our proposals. If we are to move beyond lip service to real impact, gender mainstreaming requires human and financial resources that have to be budgeted for in projects.

Another key challenge we see in relation to protection programming is **scale**. There remains a need for **standalone programmes** to address particular gaps, for example in capacity building of local women's groups and providing specific resources and services targeted at women and girls. While ECHO has been spending increasingly on GBV programmes, its overall investment in gender-focused programming remains rather limited (see also the section on SRHR in emergencies below). Furthermore, support to GBV and gender in emergencies should go beyond providing support to women survivors of sexual violence only, to the full spectrum of gender and GBV in emergencies including combatting early child marriage, sexual exploitation and abuse and other forms of GBV, and engaging men and boys as survivors and witnesses of and allies in combatting GBV.

With the EU commitments in the EU Gender Action Plan and the Comprehensive Approach on Women, Peace and Security, combined with ECHO's leadership of the Call to Action on Protection from Gender-Based Violence in Emergencies, the EU stands in a great position to advance the **GBV and women's participation and empowerment** agenda in the next few years. Especially in long-term chronic crises and post-disaster recovery periods, there is scope to promote **women's and girls' empowerment** through education and livelihoods programmes, as well as to build on these towards supporting women's participation in post-crisis decision-making and good governance efforts, which is highly necessary to get the 'Leave no one behind' commitments of the Agenda for Humanity and the SDGs implemented.

#### **Recommendations:**

- **Identify priority pilot countries** in which it will help champion the **implementation of the WHS Gender Core Commitments**, linked to efforts on 'localisation' and 'the participation revolution'. In those countries, ECHO should hold Humanitarian Coordinators and cluster leaders accountable, as their leadership is critical to enable technical gender expertise and to ensure decision making is informed by the experience of women and girls from affected communities.
- Strengthen and align approaches to **'whole of programme cycle' accountability for gender** and Leave No One Behind, **measuring outcomes**, not just processes, in humanitarian programming and funding.
- Ensure partners **budget** human and financial resources **for gender mainstreaming**.
- **Ensure funding for standalone, gender-focussed programmes in emergencies**, including programmes to prevent and respond to GBV in all of its forms, as well as sexual and reproductive health services, including family planning, in emergencies.
- Use the opportunity of ECHO being the Chair of the **Call to Action on Protection from GBV in emergencies** to **ensure more genuine commitment to and impact of the Call to Action** among EU Member States and globally.



## SECTORS

### [Sexual and Reproductive Health and Rights \(SRHR\) in Emergencies](#)

Maternal death is a leading cause of mortality for women of reproductive age globally. Fulfilling the unmet need for contraception could avert nearly one in three maternal deaths.

This need for family planning services and supplies becomes even **more acute in emergency settings**. In fact, 9 of the 10 countries with the highest maternal mortality ratios are countries affected by conflict, and the high maternal mortality often outdoes many times the mortality caused by the direct effect of the crisis itself. Despite these facts, conflict-affected countries receive 57% less funding for reproductive health than non-conflict-affected countries.

At the same time, evidence and experience show that providing family planning is **feasible**, even in the most challenging of settings. A set of simple lifesaving interventions have been developed: the **Minimum Initial Service Package for SRH**, or “MISP”. The MISP covers a range of activities including:

- Distribution of medicines and supplies for safer pregnancies, deliveries and family planning.
- Support for provision of services for normal and complicated deliveries, new-born care, family planning and care following unsafe abortions.
- Condom distribution and treatment of sexually transmitted infections.
- Protection of women and girls from sexual violence and provision of clinical care for survivors of sexual violence.

Despite the fact that the need is clear, the demand is high and we know what to do about it, **ECHO does not currently provide scope for responding to Sexual Reproductive Health and Rights as a core sector of response**. SRHR is only touched upon in ECHO’s overall Health Policy. This is a huge missed opportunity. Not only do we expect the second largest humanitarian donor in the world to give specific attention to the major cause of maternal mortality, but we also believe ECHO could easily demonstrate leadership in this area by creating opportunities for synergies and integration in humanitarian response. For example, there are clear opportunities for programme integration with programmes on GBV and nutrition security, especially for pregnant and lactating mothers and their children. Another example is the growing number of underage mothers whom could be supported much more effectively via integrated protection and SRHR responses. Millions of women and girls are living in crisis-affected settings. Without deliberate efforts to reach them, we will not be able to meet Family Planning 2020 (FP2020) goals or fulfil our commitments to leaving no one behind and ensuring all women and adolescents can exercise their sexual and reproductive rights.

### Recommendations:

- Implement the **MISP** at the onset of every crisis. Systems and funding must be put in place to ensure delivery and continuity of comprehensive family planning services, including access to all contraceptive methods, through all phases of humanitarian response, including in protracted crises.
- **Encourage governments** of disaster- affected countries to include concrete actions that ensure access to family planning in humanitarian settings in their FP2020 commitments and Costed Implementation Plans.
- Include the provision of family planning services in the investments in **preparedness** to strengthen health systems against crises.
- Coordinate with donors along the humanitarian-to-development continuum on the investments to ensure **continuity of support** for family planning services.

## Shelter and settlements

For reasons ranging from conflict to climate change, each year hundreds of thousands of families see their housing destroyed by disaster or are forced to flee their homes due to hostilities. Without safe and secure housing people are exposed to increased violence and risk of illness. CARE applauds the fact that **ECHO has a formal shelter and settlements policy<sup>12</sup>**, and the engagement of ECHO with the Global Shelter Cluster and UK Shelter Forum is very useful in aligning the programming of actors and the expectations of donors around achievable best practice.

However, there is considerable inconsistency from country to country on how ECHO implements shelter and settlements funding. Moreover, because of a lack of consistency of policy, or complementarity of policy, with other donors, it can be **difficult to design coherent programmes with multi-donor funding**. The fact that ECHO, as a major humanitarian donor, does not have a **shelter specialist in a global advisory role**, means that at country level policy is left to the interpretation of non-specialist Technical Advisors, and is hence inconsistently applied. There is also as a result limited opportunity for expert dialogue between agency specialists, country shelter coordination mechanisms, and ECHO, which in the case of OFDA and DFID has repeatedly allowed better quality programme decisions to be taken together.

In addition, there is often a **difference between the expectation** of what shelter programming will achieve **and the funding available**. Terms like 'core house' and 'semi-permanent' shelter are used with little understanding of their meaning or their implication on programming. A core house is, for example, a permanent, durable building, but often actors are expected to provide it using emergency funding – with a tendency to reduce beneficiary numbers. A recent example of this was in the hurricane Matthew response, where emergency funding from ECHO was used to rapidly provide basic roofing materials to support recovery, but it later became clear ECHO was dis-satisfied that people did not have completely safe houses by the end of the programme. For the future, CARE recommends that ECHO shelter programming focusses on emergency response and supporting recovery with appropriate combinations of material assistance, cash, and technical assistance.

More considered Disaster Risk Reduction approaches in ECHO programming, which support safer recovery at scale, make incremental improvements in resilience, and do not undermine affected people's chosen recovery trajectory, would add value and have been shown to be cost-efficient in reducing or preventing the negative impacts of a disaster relative to the cost of a post-disaster response.

Lastly, when it comes to settlements in protracted crises, all of us need to get better at including the environmental impact in our analyses for integrated risk management.

#### **Recommendations:**

- More wide and **consistent use of the new ECHO shelter and settlements policy**.
- Provision of a **central technical shelter ECHO specialist** to liaise with partners and the shelter cluster and to advise ECHO Technical Assistants and Desks.
- Greater engagement with, and support to, **technical assistance to affected people**, alongside the use of material assistance and cash. Strong technical assistance should become a central tenet of ECHO shelter responses, in order to provide relevant assistance at scale.
- Funding for, and support to, the assessment and avoidance or **mitigation of the environmental impact** of shelter responses.

#### **Cash: a modality, not a goal in itself**

CARE welcomes ECHO's **increased attention to the use of Multi-Purpose Cash (MPC)**, as part of substantial efforts from the humanitarian community (notably the Grand Bargain) to further increase the use of cash as a modality of humanitarian response and recovery. Like ECHO, we are in favour of a cost-efficient, effective, comprehensive and all-encompassing approach to cash, which seeks to address the fragmentation issues currently observed in many cash-based responses (with several actors concurrently running cash systems and coordination mechanisms).

A number of issues are to be considered:

First of all, in the same way that we need to tailor assistance to various vulnerable groups, we also need to **be wary of a "one size fits all" approach to delivering cash**.

The risk of adopting a **single cash delivery system** at national level is that it **could make particularly vulnerable groups simply "invisible"**, leaving them unable to access assistance or at risk of violence or harassment if they can access assistance because of the specificities of the single platform that might not respond to the group's unique limitations and/or protection needs. Communities are not homogenous, people have different access barriers which at times call for multiple systems of delivering cash, or a combination with in-kind aid. Some agencies may have a much better contextualised and networked response in certain geographic regions, which might be hard to access for the single provider, so reach (in all senses of the word) has to be taken into account, as ECHO itself has recognised for the Somalia response.

Moreover, contracting one agency or consortium could be a high risk strategy in some countries, such as Sudan in recent years when agencies were PNGed (Persona Non Grata). If that happens to the single contracted party that delivers cash, there is a huge risk to the overall humanitarian response. In general, the success of the cash transfer programme depends on how responsive the

financial services are, so **there needs to be coherence on overall design and decision making.**

It is also important that the **cash value** gets adapted according to its receiver. Average income sources vary widely across demographics such as gender, age and geography, which requires adapting the Survival Minimum Expenditure Basket to different regions or adding a top-up value for older or sick people, recognising that their average earnings are lower. In addition, even if the population appears 'stable', movement still does take place, even between the country of refuge and the home country of the beneficiaries. Systems need to be designed to take the **fast changing environment** into account so that households in need are not left out due to a technicality, or for missing the registration wave.

When it comes to **connecting humanitarian cash transfers with social protection systems**, ECHO recommends doing this where possible and as early as possible in the response. In the feasibility assessment, it is key that cash transfer values are realistic. Often governments demand a close alignment of the two systems, but the transfer values for social safety nets have often been set pre-crisis and at levels which already fail to meet the basic needs of beneficiaries, which is then further worsened with increased inflation due to the crisis. Therefore we welcome the commitment from ECHO to work with national governments in revising their social safety nets during humanitarian emergencies, as well as advocating on behalf of humanitarian agencies to lift restrictions on MPC transfer values when they are not aligned with emergency market prices and needs. The efforts should be conducted jointly, with the ultimate goal for the government to take over the delivery of emergency cash assistance when their systems and budgets can absorb the expansion in the numbers of beneficiaries and levels of need. The aim is to have shock responsive, flexible social protection mechanisms, like the PSNP in Ethiopia and the HSNP in Kenya which can be scaled up or down in accordance to emergencies. Needless to say, as long as the government's own social protection systems cannot cover the humanitarian beneficiaries, humanitarian aid, in cash or other forms, will remain needed.

Another issue is that a **multi-purpose response** is at present **not well supported by response structures**. Coordination, assessments, funding calls and response discussions are still centred sectorally. Thus, to have multi-sector data also requires effective use of current coordination structures (e.g. clusters) which may take time and delay multi-purpose response in certain countries.

There is also a risk that this approach may stifle market **competition and novel ways to identify, target and get money to beneficiaries, and subsequently reduce diversity in the Financial Service Providers market**, which is a risk that grows if other donors adopt the same approach or partner up with ECHO for a joint approach.

### **Recommendations:**

- Avoid the **false perception that cash programming is simply ‘pressing a button every month’** to electronically transfer cash, but rather a complex modality that requires technical support at the individual, family and community level.
- **Pilot** the new ECHO cash approach in a few countries and commission an independent assessment to see what, if any barriers arise to responsive monitoring in order to ensure appropriate risk mitigation measures and procedures are in place before rolling out a ‘one cash delivery’ system.
- Ensure that the recommendations of ECHO country and regional Technical Assistants, in consultation with all the relevant ECHO partners, will be integral to the decision making process about how the cash guidance note is applied, to guarantee the decisions (including the cash value) are **well informed by field reality**.
- Make sure that the partners funded by ECHO for cash operations are meaningfully **engaged with cash coordination structures** where they exist.



## THE HUMANITARIAN – DEVELOPMENT NEXUS, RESILIENCE & DISASTER RISK REDUCTION

Resilience means strengthening poor people and communities' capacity and assets to anticipate, absorb and adapt to shocks and stresses, manage growing risks, and transform their lives in response to new hazards and opportunities<sup>14</sup>. It is also about addressing the underlying causes of vulnerability.

This implies working towards a **better integration of humanitarian, disaster risk reduction, social protection, climate change adaptation, natural resource management, conflict mitigation and other development actions**. It requires the constant analysis of risks, and the ability to learn and change, promoting choice and leadership. CARE therefore does not believe in standalone resilience programming. Increasing resilience is a way of working and approaching hazards and risk, you do not suddenly move into a 'resilience phase', it should be a permanent feature of programmatic thinking.

Building resilience also demands **inclusive governance** that addresses marginalisation and inequality drivers of vulnerability. Vulnerable populations must be empowered to manage risk and to access decision making processes that impact their futures. This will ultimately lead to investments, services and policies that correspond with their needs and build community resilience. In that vein, we strongly applaud that the EU Sendai Action Plan commits to support the development of inclusive local and national Disaster Risk Reduction (DRR) strategies, with active engagement of civil society, also because it is crucial to combine local, indigenous forms of knowledge with scientific risk data to strengthen resilience.

The humanitarian sector has long sought to promote a 'building back better' paradigm in early recovery efforts. While this is typically thought of in terms of physical rehabilitation, the same principle applies to how agencies support **participatory approaches** to women's involvement across all sectors. Increased gender equality leads to better recovery and in the longer term increases resilience of populations. As women tend to transfer improvements in their own lives into the lives of their children, families and communities, they are crucial partners for improving community resilience. Gender and GBV prevention should be integrated much more effectively into work on disaster risk reduction, resilience, and links between humanitarian aid and development.

The EU has a policy and action plan on resilience from 2012, focused on lessons learnt from food security crises, as well as a new policy framework on a wider view of resilience from 2017, which includes state and societal resilience (see section above on humanitarian principles). Moreover, a resilience marker was introduced by ECHO in 2015 to assess to what extent humanitarian actions funded by ECHO integrate resilience considerations. In addition, ECHO and DEVCO are at present developing a strong and active humanitarian-development stream in six priority countries. There is thus **no shortage of EU resilience policies, narrative and commitments, but practice varies**.

Looking at CARE's experience with ECHO through-out the last five years, we have indeed seen a **significant** improvement in attention for resilience building, thereby linking relief and development, compared to before 2012. For example in the case of the El Niño drought emergency in 2016, ECHO was the only donor to allow CARE to respond to both immediate and long term security needs, and in some cases ECHO has acted as an intermediary to ensure we could continue programming with Africa Trust Fund money. In addition, the 'Lives in Dignity' Communication from 2016 brought a highly necessary focus of DEVCO on protracted displacement, whereby it was realised that with an average

duration of 17 years, refugee response could no longer be dealt with by annual humanitarian funding cycles. Implementation of this policy is now actively being thought through, as the EU's contribution to the global Comprehensive Refugee Response Framework and Global Refugee Compact discussions. Also in terms of Disaster Risk Reduction, ECHO has been a frontrunner, for example with the DIPECHO programme, and via its influence on this topic on the global scene.

But there have still been multiple cases where CARE has been aiming to move to resilience building but instead was pressured into continuing in-kind annual programming for years, with no opportunities to advance livelihoods of the populations in a more sustainable way, with either EU humanitarian or EU development funding. Also the European Court of Auditors notes for the Great Lakes: *"While the desirability of Linking Relief, Rehabilitation and Development has been widely accepted by the Commission and other donors, there are very few examples of this being applied in practice. Without very actively pursuing this goal there is a danger that opportunities to move from humanitarian aid to development aid will be missed."*<sup>15</sup> We thus conclude that also in the case of the humanitarian-development nexus, there is still **a lack of institutionalisation**, despite all the policies, and instead it often depends on personal interests and connections between relevant ECHO and DGs DEVCO/NEAR staff.

With the Agenda for Humanity, the international community has committed to investing in local capacity, investing according to risk, and to shift from funding to financing, all of which will support this resilience agenda if properly implemented.

#### **Recommendations:**

- **Strive for resilience-building in all contexts** without losing ECHO's principled life-saving focus.
- Working on resilience also requires multi-annual financing (*See section on partnership above*), as well as **flexibility from donors**. It requires **adaptive management**, for example via the introduction of a **crisis modifier**, to be able to adapt funding to changing circumstances.
- Recognising women will most often transfer improvements in their own lives to benefit their children, families and communities, **integrate gender and GBV prevention more deliberately** and systematically into work on disaster risk reduction, resilience and links between humanitarian aid and development.
- Work with DG DEVCO to implement the policy on using **development cooperation in protracted displacement crises**, feeding in lessons learnt also from the Trust Funds **into the global Comprehensive Refugee Response Framework (CRRF) process**.
- Ensure that the **single country assessment proposed** in the 2017 Resilience Communication does **not** lead to any **(political) pressure in terms of decision-making on humanitarian programming**, which must remain independent and needs-based.

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CARE International

**EU Office**

Rue du Trône 12  
1000 Brussels  
Belgium  
T) + 32 (0) 2 289 00 18

<http://www.care-international.org/home-page/advocacy/brussels>

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