

# Locally led disability-inclusive action

OPDs' access to humanitarian funding and partnerships in Jordan, Ukraine and Pakistan.

Synthesis report

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# Acronyms

ADTWG	Age and Disability Technical Working Group					
DI	Development Initiatives					
DAC	Development Assistance Committee					
CAR	Central African Republic					
CSO	Civil society organisation					
CBPF	Country-based pooled fund					
FTS	Financial Tracking Service					
GLAD	Global Action on Disability					
ΙΑΤΙ	International Aid Transparency Initiative					
IASC	Inter-Agency Standing Committee					
IDA	International Disability Alliance					
INGO	International NGO					
NFI	Non-food item					
OPD	Organisation of persons with disabilities					
OECD	Organisation for Economic Cooperation and Development					
PoP	Principles of Partnerships					
SBP	Standby partnership					

UNDP	United Nations Development Programme
UNHCR	United Nations High Commissioner for Refugees
UNOCHA	United Nations Office for the Coordination of
	Humanitarian Affairs

# **Working definitions**

**Organisations of persons with disabilities (OPDs):** are organisations that are led, directed, and controlled/governed by persons with disabilities. The majority of OPDs' staff are recruited from the community of persons with disabilities. OPDs are entrenched, committed to, and fully respect the principles and rights enshrined in the Convention on the Rights of Persons with Disabilities. They are established primarily with the aim of collectively acting, expressing, promoting, pursuing and defending the rights of persons with disabilities.<sup>1</sup> OPDs are distinct from organisations *for* persons with disabilities, which provide services and/or advocate on behalf of persons with disabilities. This can potentially lead to a conflict of interest as such organisations may prioritise their purpose/mandate over the rights of persons with disabilities.<sup>2</sup>

**Local organisation of persons with disabilities:** For an organisation of persons with disabilities to be considered local, we used the definition of the Inter-Agency Standing Committee's Localisation Marker Working Group.<sup>3</sup> The group defines local organisations as those in which actors operate in their own aid recipient country and are not affiliated with an international non-governmental organisation (NGO).

**Direct funding:** For institutional donors – direct funding from the original donor to local and national organisations. For UN agencies and international NGOs – the direct onward transfer of publicly raised funding (funding that does not come from institutional donors) to local and national organisations.<sup>4</sup>

**Funders:** The term funder is used in the report to refer to agencies (including INGOs, UN agencies and donors) that mobilise their own funding through various approaches including public donations, and that provide OPDs with the funds to implement their humanitarian programmes. We acknowledge that aside from donors, other agencies such as INGOs also mobilise their own resources which they can use flexibly to fund local responders such as OPDs.

# **Executive summary**

This report maps donor investments by humanitarian agencies and the quality of their partnerships with organisations of persons with disabilities (OPDs) in the response to humanitarian crises in Ukraine, Pakistan and Jordan. The report also reviews the participation of OPDs in the coordination of the humanitarian response. The report is based on quantitative data from the International Aid Transparency Initiative (IATI) and Financial Tracking Service (FTS) databases and qualitative data collected through interviews with donors, international NGOs (INGOs) and OPDs.

### OPDs' participation in the crisis response

- In collaboration with international agencies, OPDs responded to the crises in Ukraine, Pakistan and Jordan in several ways, including advocacy, capacitybuilding and delivering specific services to persons with disabilities.
- While OPDs do not consider themselves to be humanitarian agencies, their agile/adaptive programming approaches enabled them to participate in the emergency response to ensure that the needs of crisis-affected persons with disabilities – who are often left behind – were addressed.
- Leading the last-mile delivery of humanitarian aid significantly strained OPDs' resources and their frontline staff, in part due to inadequate financial and technical support from their international partners. This was compounded by security threats and access challenges, especially in Ukraine and Pakistan.
- Faced with resource constraints, OPDs employed proactive approaches in seeking partnership opportunities and leveraging alternative funding sources – such as local philanthropists, businesses and individuals – to access cash and inkind donations.

### **Quality of partnerships**

 International responders made deliberate – albeit limited – efforts to facilitate partnerships with OPDs. These included waiving some partnership requirements, requesting that partners work with OPDs, strengthening OPDs' organisational

capacity, and providing opportunities for OPDs to participate in key processes such as needs assessments.

- However, equitable partnership approaches are still the exception rather than the norm. Equitable approaches are common mainly among disability-focused agencies and/or funders that have adopted policies on localisation and disability inclusion.
- Limited expertise on disability inclusion constrains the ability of funders (donors, UN agencies, INGOs) to form equitable partnerships with OPDs.
- International responders and large national NGOs are still seen as having more legitimacy, leading to inequitable partnerships with OPDs.
- OPDs with capacity challenges are more likely to be engaged by international agencies as subcontractors as their capacity constraints limit their ability to fulfil international agencies' partnership criteria.

### Access to funding

- OPDs' access to funding depends on their ability to fulfil grant requirements that are critical for the accountable and transparent management of grants and adherence to the 'do no harm' principle.
- Despite widespread challenges, funders made concerted efforts to enhance OPDs' access to funding. These included establishing dedicated funds for national/local organisations, including disability experts in grantee selection panels, strengthening OPDs' fundraising capacity, and referring OPDs to potential funders.
- However, OPDs' access to funding is still constrained by several institutional capacity constraints, stringent funding eligibility criteria, and inaccessible information about funding opportunities. Even when funding is available to OPDs, it seldom covers their indirect costs and is often earmarked, limiting their ability to adapt their emergency response to changing contexts.
- The allocation of overheads to OPDs is often curtailed by the lack of a standardised and transparent approach. This issue is compounded by inconsistencies in cost classification, limited availability of flexible funding and funders' slow progress in adopting policies/guidelines for advancing overheads.
- A few funders provided overheads as unrestricted funding, enabling OPDs to use the funds according to their operational and capacity development needs. Moreover, a few OPDs mobilised additional resources through social enterprise, membership fees and public donations to recover their indirect costs. Scaling up

these approaches is critical to addressing the funding bottlenecks that slow OPDs' participation in crisis responses.

### Coordination of the humanitarian response

- Coordination of humanitarian responses in Ukraine, Pakistan, and Jordan is facilitated through several coordination platforms led by donors, INGOs, UN agencies and national civil-society organisations (CSOs). Typically, efforts made to promote disability-inclusive coordination are siloed within the protection cluster, where a specific task force/working group has been established in the three countries to coordinate disability-inclusion issues.
- Inadequate access to national coordination platforms has motivated some OPDs

   particularly in Jordan and Ukraine to form networks and coalitions in order to coordinate themselves operationally at regional and local levels. However, these networks and coalitions tend to be relatively new, are underfunded and grapple with weak leadership.
- Overall, OPDs participation in coordination is slowed by their limited understanding of national and international coordination systems, inadequate staffing levels, lack of financial resources, and their inadequate representation on mainstream coordination platforms. This is compounded by a lack of expertise on disability inclusion within national coordination platforms.

## **Recommendations for donors, INGOs and UN agencies**

#### Quality of partnership and participation

- Develop, resource and implement policies and guidelines on disability-inclusive humanitarian action, building on and institutionalising existing guidelines on disability, such as the IASC Guidelines on the Inclusion of Persons with Disabilities in Humanitarian Action 2019.<sup>5</sup>
- Strengthen long-term strategic partnerships as the current practice of working with OPDs through short-term, project-based agreements perpetuates subcontracting and unequal power dynamics. Long-term strategic partnerships should be based on mutual respect, trust and complementarity to shift uneven power dynamics.
- Enhance transparency and partnership dialogues with OPDs to agree on common standards for joint response operation, responsibilities, reporting

arrangements and grant management to strengthen OPDs' voices in partnerships and decision-making processes.

#### **Quality of funding**

- Make funding opportunities more inclusive. This includes simplifying application
  processes by considering OPDs' limited technical capacity, providing information
  about funding opportunities in accessible formats, and aligning funding criteria
  more closely with the needs and objectives of OPDs. Importantly, funders should
  engage in peer advocacy to promote more inclusive approaches to making
  funding available and accessible to OPDs.
- Strengthen OPDs' fundraising efforts by supporting them to document and create visibility for their work and provide capacity-strengthening support to them in areas such as funding proposal development.
- Increase funding for OPDs' overheads. This includes adopting guidelines for sharing overheads, as well as advancing overheads as unrestricted funding to enable OPDs to use it according to their operational and organisational development needs.
- Provide flexible funding to enable OPDs to adapt their operations to changing contexts and humanitarian needs.

#### **Quality of coordination**

- Provide capacity-strengthening support to improve OPDs' understanding of humanitarian coordination systems and their ability to lead coordination.
- Hire experts on disability inclusion to support coordination platforms in engaging meaningfully and effectively with OPDs, including promoting their participation by providing reasonable accommodations.
- Provide OPDs with financial resources to facilitate their coordination work.
- Facilitate equitable representation of OPDs in coordination platforms.

# **1. Introduction**

**Persons with disabilities comprise a significant proportion of the world's population.** An estimated 1.3 billion people, equivalent to 16% of the world's population, have disabilities.<sup>6</sup> Of these, 1.3 billion people – approximately 80% – live in low- and middle-income countries.

**Disasters have varying impacts on various population groups, depending on their level of exposure to hazards prior to disasters striking.** Persons with disabilities may not be able to flee disaster-affected areas, for both physical and economic reasons. They may also find it more difficult to access humanitarian assistance and protection during an emergency than others.<sup>7</sup> Notably, persons with disabilities face different physical, attitudinal, institutional and communication-based barriers that constrain their participation and inclusion in humanitarian responses.<sup>8</sup> These barriers can be further reinforced by characteristics such as age, sex, ethnic origin, and place of residence, which may contribute to further marginalisation and discrimination.<sup>9</sup>

**Globally, significant gains have been realised in establishing policy frameworks that promote disability-inclusive humanitarian practices.** The UN Convention on the Rights of Persons with Disabilities, under Article 11, obliges state parties to ensure the inclusion of persons with disabilities by taking all necessary measures to ensure their protection and safety during emergencies.<sup>10</sup> The Charter on Inclusion of Persons with Disabilities in Humanitarian Action<sup>11</sup> – which was launched at the 2016 World Humanitarian Summit – and the UN Disability Inclusion Strategy, 2019<sup>12</sup> also promote disability-inclusive humanitarian action. Additionally, several guiding materials have been developed to facilitate disability-inclusive humanitarian practices. These include the 2018 Humanitarian Inclusion Standards for Older People and People with Disabilities<sup>13</sup> and the IASC Guidelines on Inclusion of Persons with Disabilities in Humanitarian Action 2019.<sup>14</sup> Despite these efforts, persons with disabilities are still often overlooked at all stages of the emergency management cycle.<sup>15</sup>

The inclusion of persons with disabilities and the organisations that represent them must become the norm rather than the exception in humanitarian action. The Grand Bargain commitments on localisation underline the need for humanitarian actors to adopt a longer-term approach in their collaborations with local actors, including

organisations of persons with disabilities (OPDs). Accordingly, humanitarian actors must establish systemic, meaningful, equitable and mutually reinforcing partnerships with OPDs to ensure effective participation of and support to persons with disabilities.

Equitable partnerships between humanitarian agencies and OPDs are critical for enhancing the effectiveness and accountability of humanitarian action. Partnering with OPDs enables humanitarian actors to access persons with disabilities' expertise and knowledge about their experiences, the situations they live in and their needs. Importantly, partnerships promote capacity-building and cross-learning between OPDs and humanitarian agencies. They also facilitate sustainability and continuity of action as OPDs remain in the affected communities to provide support even after a crisis.

This situational analysis of access to humanitarian funding and partnerships with OPDs in Ukraine, Jordan and Pakistan continues a series of country studies carried out in 2022 on donor investments in OPDs in Bangladesh, Kenya and Nepal. It focuses on the participation of OPDs in the response to the crisis caused by the war in Ukraine, the floods and refugee crises in Pakistan, and the refugee crisis and the impacts of climate change in Jordan between 2021 to 2022. The study maps donor investments by humanitarian agencies and the quality of their partnership arrangements with OPDs in the three case study countries. It also reviews the participation of OPDs in humanitarian coordination mechanisms.

# 2. Disability-inclusive funding

### 2.1. Humanitarian funding landscape

In 2022, humanitarian funding to Ukraine and Pakistan increased significantly, but reduced marginally in Jordan (Figure 1). Funding to Ukraine increased 25-fold to address the social and economic impacts of the Russian invasion. In Pakistan, humanitarian funding increased by just over a third (34%) to facilitate delivery of lifesaving and life-sustaining assistance to populations that were affected by floods. While Jordan is facing a protracted refugee crisis, humanitarian funding decreased by 5% in 2022.

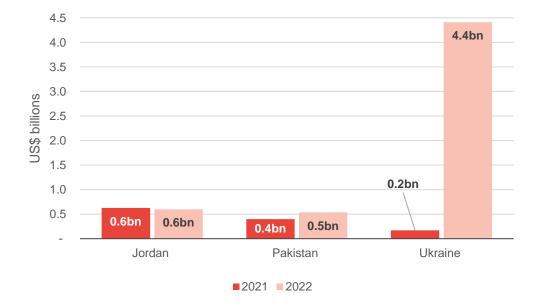


Figure 1: Humanitarian funding to Jordan, Pakistan, and Ukraine in 2021 and 2022

Data source: DI based on data obtained from UNOCHA Financial Tracking Service.

Notes: The analysis is based on data downloaded in November 2023.

**Donors prioritised Ukraine and Pakistan in the allocation of aid, contributing to the significant increase in humanitarian funding in 2022.** Overall, 86.6% and 72% of the humanitarian response plan funding requirements for Ukraine and Pakistan respectively were met. A separate report published by Development Initiatives shows that the Ukraine crisis was unusually well-funded compared to other global crises in 2022. As at the start of August 2022, over 80% of Ukraine's flash appeal had been funded, significantly higher than for other crises, for which funding covered only an average of 30% of requirements (at the start of August).<sup>16</sup>

The reduction in financing flows to Jordan has significant implications for the welfare of refugees. Concerningly, the Jordan Response Plan was 87% underfunded in 2022, curtailing efforts to address the needs of refugees.<sup>17</sup> Furthermore, the Regional Refugee and Resilience Plan led by UNHCR and UNDP to respond to the Syria crisis in five countries (Türkiye, Lebanon, Jordan, Iraq, and Egypt) in 2022 was 92% underfunded. As a result of financing constraints, the World Food Programme had to reduce the food assistance provided to refugees living in host communities in Jordan by a third in 2022.<sup>18</sup> The UNHCR warned of a possible deterioration in the living conditions of refugees if the funding gap is not urgently addressed.<sup>19</sup>

Humanitarian funding was mainly channelled through international actors, particularly UN agencies and INGOs. Data from UNOCHA Financial Tracking Service (FTS) shows that in Jordan, 92.2% of humanitarian funding was channelled through international actors. FTS data also shows that international actors accounted for 80% and 83% of direct donor funding to Pakistan and Ukraine respectively. These trends reflect the challenges that local and national responders – particularly NGOs, OPDs and women's rights organisations – face in accessing direct funding from donors. They are also at odds with efforts aiming to facilitate localisation.

### 2.2. Disability-inclusion funding landscape

**Funding for disability inclusion increased in Ukraine and Pakistan but declined marginally in Jordan between 2021 and 2022 (see Figure 2 below).** Data from the International Aid Transparency Initiative (IATI) shows that funding for disability inclusion more than doubled in Ukraine and increased by 36% in Pakistan in 2022. Mirroring the trend in the humanitarian financing landscape, disability inclusion funding decreased by 2% in Jordan between 2021 and 2022 (Figure 2).

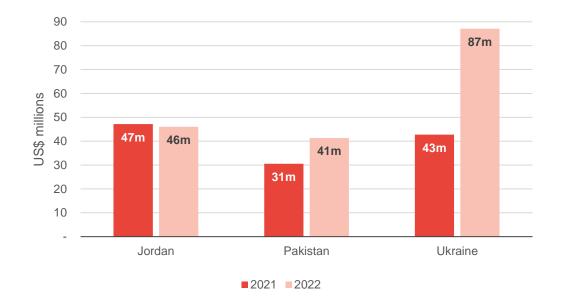


Figure 2: Funding for disability inclusion in Jordan, Pakistan, and Ukraine in 2021 and 2022.

Data source: IATI data accessed August 2023.

Notes: Total disbursement to disability inclusion includes ODA, other official flows and other private flows.

#### Donors report financial data on disability using the OECD-DAC disability policy

marker. This involves scoring development cooperation activities as either 'principal' or 'significant', depending on their policy objectives. Activities that have a deliberate objective to ensuring persons with disabilities are included, and that permit the equal sharing of benefits with persons without disabilities, are marked as 'principal'. Objectives that contribute to promote, protect, and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and promote respect for their inherent dignity are marked as 'significant'.<sup>20</sup>

GLAD Network members are the main source of disability inclusion funding. Data from IATI shows that between 2021 and 2022, GLAD Network members provided an average of 94% of the funds earmarked for disability inclusion activities in the three countries. Overall, activities marked 'significant' accounted for 91.4% and 99.2% of disability inclusion funding in Jordan and Pakistan respectively. In Ukraine, all the disability inclusion funding went to activities marked significant.

In 2021, the education sector received the largest share of disability inclusion funding in all three countries (see Table 1 below). However, allocations to the education sector for disability inclusion decreased across the board in 2022, possibly due

to funds being diverted to humanitarian responses (share of allocations to the humanitarian sector increased in all the countries in that year). While the education sector still received the largest share of disability-inclusive funding in Jordan and Pakistan in 2022, it was still greatly reduced in comparison to 2021 (falling from 60.6% to 37.3% in Jordan and from 84.1% to 60.8% in Pakistan). In Pakistan, the proportion of funding to the humanitarian sector increased from 2.3% in 2021 to 29.1% in 2022. In Ukraine, a third of disability-inclusive funding went to the education sector in 2021, but this fell to 8.5% in 2022 when just over two-thirds (69.4%) of funding was allocated to the humanitarian sector.

SECTOR	Jordan 2021	Jordan 2022	Pakistan 2021	Pakistan 2022	Ukraine 2021	Ukraine 2022
Education	60.6%	37.3%	84.1%	60.8%	33%	8.5%
Governance and security	17.8%	2.4%	7.5%	7.4%	29.8%	11.3%
Other social services	9%	25.8%	1.5%	0.4%	5.7%	1.1%
Humanitarian	6.7%	18.9%	2.3%	29.1%	19%	69.4%
Other	5.8%	15.7%	4.6%	2.3%	12.4%	9.7%

#### Table 1: Disaggregation of disability-inclusive funding by sector, 2021 and 2022

Source: DI based on data from IATI

# 3. Methodology

## 3.1. Scope of the study

The three case study countries were selected because of the diverse nature of the humanitarian crises they are facing. Studying them allows us to understand the OPDs' experiences of accessing funding and participating in the delivery of humanitarian aid in emergency contexts stemming from armed conflict in Ukraine, an extreme weather event and a refugee crisis in Pakistan, and the effects of climate change and conflict-induced migration from Syria to Jordan (the Jordan refugee crisis). The study was designed with two overarching objectives. The first was to conduct a situational analysis of OPDs' access to humanitarian funding and their partnerships with humanitarian organisations (donors, UN agencies and CSOs/INGOs). The second was to draft recommendations in consultation with relevant stakeholders - including OPDs - for discussion with the GLAD Network. The recommendations focus on financing, quality of OPDs' partnerships with funders (donors, INGOs, UN agencies), and humanitarian coordination.

### 3.2. Analytical approach

The analysis focused on three dimensions of localisation based on localisation indicators drawn and contextualised from relevant literature,<sup>21,22,23</sup> namely partnership/relationship quality, funding and coordination. Figure 3 below summarises the conceptual framework for the study.

#### Partnerships/quality of relationships

The parameters used to assess the quality of relationships included joint identification of programming priorities, partnership eligibility criteria, involvement of OPDs at every stage of the programme cycle, and OPDs' participation in programme governance and decision-making processes. We also documented the enablers of and disablers to equitable partnerships.

#### Funding

This dimension covers access to funding and the quality of funding. To assess access to funding, we reviewed the criteria for selecting OPDs for funding, OPDs' roles in shaping funding decisions, and the extent to which funding opportunities (such as calls for proposals by donors) were inclusive. The parameters used to assess the quality of funding include the extent to which overheads were advanced to OPDs, alignment of funding to OPDs' internal systems, opportunities for making reasonable adjustments to budgets, timely disbursement of funding, and management of financial risks.

#### Coordination

For this dimension, we assessed OPDs' participation in the coordination of humanitarian responses, coordination challenges, and OPDs' empowerment to coordinate humanitarian responses.

#### Figure 3: Conceptual framework for the study

#### **Relationship quality**

- Nature of relationship
- Priority identification
- Eligibility criteria
- Role in partnerships
- Participation in governance
- Enablers and disablers
- Best practices

#### Funding

- Selection criteria
- Funding for overheads
- Systems alignment
- Flexibility of funding
- Direct funding
- Timeliness of funding
- Risk management

#### Coordination

- OPDs' representation
- OPDs' roles/participation
- Challenges
- Support for coordination

Source: Development Initiatives.

### 3.3. Data collection

We collected data through key informant interviews with 46 organisations: 33 OPDs plus 13 donors, INGOs and a UN agency across the three countries. We conducted 44 interviews virtually using Zoom, one interview over the phone, and one respondent provided written responses by email. We adopted a purposive sampling technique to

select respondents. Importantly, our OPD selection criteria considered OPDs' size (staff/budget), location (urban/rural), region, type of organisation (federation, union, national, district, community-based organisation) and representation of constituents (demographic, gender, disability categories). We obtained informed consent before conducting the interviews. Data and transcripts were anonymised to ensure their confidentiality.

# 4. Main findings

### 4.1. Partnerships and meaningful participation

Effective and accountable humanitarian action requires partnerships at national and local levels to ensure localisation and the inclusion of persons with disabilities. In 2007, the Global Humanitarian Platform member organisations adopted the Principles of Partnerships (PoP) to facilitate equitable partnerships between humanitarian actors. These principles include equality, transparency, results-oriented approaches, responsibility, and complementarity.<sup>24</sup> Nevertheless, the PoP does not provide a clear definition of partnership as a concept in the context of humanitarian action. Consequently, what is understood by the term 'partnership' varies across organisations.

In this report we use the word 'partnership' to describe collaborations that endeavour to be equitable. These are relationships in which all parties 'are decisionmaking partners, and have input and influence in the conceptualisation, design, planning and adaptive management of a joint action and take full part in reflections, reviews and learning'.<sup>25</sup> We distinguish partnerships from subcontracting agreements in terms of the extent to which OPDs are involved in every stage of the project cycle; have influence over decisions that are relevant to a project; and have access to capacity-strengthening support and quality funding that covers their direct and indirect/overhead costs.

#### **OPDs' participation in humanitarian responses**

International responders' limited access and capacity constraints meant that national and local responders such as OPDs had to lead the last mile delivery of aid. In Ukraine – where international responders had limited access due to their inadequate understanding of local security threats and protocols – OPDs and other local/national responders led the delivery of aid, especially to remote, hard-to-reach villages and frontline areas. Similarly, in Pakistan and Jordan, OPDs played a key role in the last-mile delivery of aid because of better access to and understanding of local contexts. In collaboration with international agencies, **OPDs responded to the crises in several ways including advocacy, capacity-building and delivering specific services to persons with disabilities.** Under the coordination of their associations, OPDs conducted advocacy at national and subnational levels to promote and protect the rights of persons with disabilities. For example, one umbrella OPD in Ukraine helped draft the Cabinet of Ministers' resolution on humanitarian assistance and provided expert revision of 150 drafts pieces of legislation during the humanitarian response. OPDs also participated in the direct delivery of aid by running various programmes. These included rehabilitation services, preventing gender-based violence, providing legal support, distributing food and non-food items, and facilitating access to basic services, assistive devices, and psychosocial support. Notably, OPDs also strengthened the capacity of humanitarian actors on disability inclusion through technical advice and training.

Agility allows OPDs to be responsive in crisis situations. While the OPDs we interviewed did not consider themselves to be humanitarian agencies, they employ an adaptive programming approach that enables them to participate in the delivery of humanitarian aid during crises. This agile approach is designed to promote a disability-inclusive crisis response by integrating the voices of persons with disabilities who are seldom involved in humanitarian action. Notably, adaptive programming approaches were a key strength that enabled OPDs to access partnership opportunities as international agencies preferred to work with local partners with the capacity to and experience in delivering humanitarian aid. Nonetheless, not all OPDs are able to adapt their programming approaches; in part due to a lack of experience/expertise in delivering humanitarian aid and limited availability of flexible funding that enables a shift from development to humanitarian action during crises.

Leading the last-mile delivery of humanitarian aid significantly strained OPDs' resources and their frontline staff. In Ukraine and Pakistan, OPD staff faced significant risks to their physical and mental health as they navigated security threats and access challenges to delivering aid. OPDs faced various challenges, including a lack of personal protective equipment, fuel and psychosocial support for staff experiencing stress and burnout. Faced with acute funding constraints, OPDs in the three countries were forced to use their own resources – which were already inadequate and depleting even before the crises – to distribute aid. For Ukrainian OPDs, these challenges were exacerbated by a severe shortage of personnel as many of their staff members relocated abroad, were headhunted by international agencies, or were directly affected by the war e.g. were injured. In Jordan – where funders prioritised refugees with disabilities over host communities due to limited funding – some OPDs had to repurpose financial resources that they had already earmarked for development programmes to support host community members with disabilities. These challenges notwithstanding, participating in crisis responses provided OPDs with invaluable opportunities to strengthen their experience of humanitarian action.

A proactive approach to seeking partnership opportunities and leveraging alternative funding was critical to OPDs' participation in crisis responses. In Ukraine and Pakistan, OPDs that were unable to access adequate humanitarian funding from traditional funding sources such as donors, INGOs and UN agencies, reached out to local philanthropists, businesses and individuals for cash and in-kind donations. In Jordan, some OPDs have established social enterprises, while others organise social activities such as sports to raise flexible funding which they use to deliver support to crisis-affected persons with disabilities. While these efforts alone could not provide enough funding to address all needs, they enabled OPDs to reach crises-affected persons with disabilities who might otherwise have been left out in the distribution of aid.

#### **Quality of partnerships**

International responders adopted three modalities to implement their humanitarian programmes: subcontracting, direct implementation and partnerships with OPDs. In Jordan and Pakistan, INGOs and UN agencies directly implemented interventions in locations that they could access. However, they subcontracted or partnered with OPDs to deliver aid to areas where they had limited access and/or lacked the expertise to deliver specific interventions, such as providing psychosocial support. While subcontracting was common at the beginning of the crisis response in Ukraine, some INGOs and UN agencies gradually shifted to partnerships, in part due to the intense advocacy carried out by OPDs and other national and local responders.

The nature of subcontracting agreements varied from formal contracts to informal working arrangements between OPDs and international responders. Some international responders formalised subcontracting agreements through service delivery contracts that mandated OPDs to deliver certain aspects of their (international responders') predesigned interventions. This was particularly common among agencies that distributed food and non-food items (NFI) and cash transfers. Typically, INGOs/UN agencies procured food and NFIs, and contracted OPDs to distribute them in specific locations. OPDs' responsibilities included a wide range of implementation functions such as identifying beneficiaries, managing distribution, and handling complaints and feedback, while INGOs/UN agencies provided oversight, quality assurance, and monitoring and evaluation. The funding OPDs received was typically tied to the activities that they implemented and did not always include a budget for their overheads.

INGOs/UN agencies also contracted OPDs as consultants to provide capacity-building support to their local and national partners (mainly national NGOs), particularly in Ukraine and Pakistan. In these two countries, some international responders worked with OPDs on an informal basis by simply donating food and NFI kits to them (OPDs) to distribute to their constituents. In such informal arrangements, OPDs often did not receive financial support from their international partners to distribute the aid. Accordingly, OPDs had to use their own resources to collect humanitarian aid from their international partners and distribute it to crisis-affected communities.

OPDs with limited experience and capacity for humanitarian programming were more likely to be engaged as subcontractors than as strategic partners. Interviews with international responders and OPDs indicate that many local organisations particularly community-based and newly established OPDs - struggle to fulfil partnership criteria due to limited capacity in managing grants and implementing humanitarian programmes. While the capacity gaps that limit OPDs' prospects for accessing equitable partnerships can be addressed, this can be challenging in a crisis context due to constraints on time and resources (financial and staff). International responders must try and strike a balance between working with OPDs to ensure responses are disability inclusive and adhering to their internal partnership policies and guidelines to mitigate fiduciary and safeguarding risks. To minimise risks without excluding OPDs, some international responders prefer to subcontract OPDs that do not fulfil partnership criteria to deliver certain aspects of their programmes (such as identifying and registering beneficiaries), rather than engaging these OPDs as strategic partners who are involved in every decision and stage of the programming cycle. This highlights the need for systemic reforms aimed at building the capacity of OPDs so that they are empowered to form equitable partnerships with international responders.

#### The OPDs interviewed accept subcontracting agreements for several different

**reasons.** First and foremost, OPDs indicated that their main priority is ensuring that persons with disabilities are adequately supported during crises. Consequently, they work with international partners to access and distribute aid even if their collaborations/relationships with international responders are not equitable. For those OPDs that lack the capacity to fulfil partnership criteria, subcontracting is the only way to access funding. OPDs also considered any form of collaboration with UN agencies and INGOs to be important for building their profile and strengthening their experience, making it easier for them to attract more grants in future.

## The INGOs interviewed acknowledged the limitations of subcontracting with some implementing measures to work with OPDs through equitable partnerships. In all

three countries, there were several cases in which INGOs strengthened OPDs' capacity to ensure access to partnerships. For example, four INGOs explained that they have capacity-building programmes that enable them to gradually strengthen the capacity of OPDs that do not fulfil their partnership criteria. These include learning-by-doing activities in which INGOs provide OPDs with small grants to implement certain aspects of their programmes. Upon completion of these capacity-building programmes, the INGOs engage the OPDs as their equal partners. Donors could incentivise these approaches by funding INGOs/UN agencies to gradually strengthen OPDs' capacity so they can work on crisis response as equal partners.

# OPDs' involvement at various stages of the humanitarian programming cycle

While subcontracting is still common, there is evidence – particularly in Jordan and Ukraine – of a gradual shift towards partnership approaches that allow OPDs to participate in every stage of the humanitarian programming cycle. In Jordan, just over half of the OPDs interviewed reported full participation throughout the programming cycle. OPDs noted that their involvement in programmes from the outset created opportunities for them to align priorities with donors/INGOs/UN agencies by providing input into key processes such as needs assessments and programme design. It also enabled OPDs to shape the programmes and align them to their goals and expertise. In Ukraine, three-quarters of OPDs interviewed reported being involved at every stage of the programming cycle, especially at later stages of the response in late 2022 and early 2023. This is due in part to the intense advocacy carried out by OPDs and national NGOs to ensure equitable partnerships between international and national/local responders.

However, Pakistani OPDs' experience of participation in the programming cycle was very different to that of Ukraine- and Jordan-based OPDs. In Pakistan, inequitable partnership arrangements prevented OPDs from fully participating in humanitarian programming and curtailed their ability to address the needs of persons with disabilities. Of the 12 OPDs interviewed, 10 raised concerns that they were mainly engaged as subcontractors by international partners and had limited input into key processes such as cocreating programmes, needs assessments, implementation, and monitoring and evaluating programmes. One OPD representative explained that:

"Donors and humanitarian agencies just engage us for project implementation. We are just superficially involved in the response" — OPD respondent in Pakistan

The importance of OPDs' meaningful participation at all stages of the humanitarian programming cycle cannot be gainsaid. OPDs that are involved in key decisions and processes related to the crisis response from the outset can identify and agree on a shared vision and values with their partners, ensuring equity within these partnerships. A shared vision promotes partnership dialogues that are critical for agreeing on common goals and priorities for delivering quality support to crisis-affected communities. For example, one INGO in Pakistan noted that involving an OPD in the design and implementation of its programme enabled it to deliver appropriate assistive devices to crisis-affected communities in a timely fashion. Another INGO respondent described the importance of effective OPD participation as follows:

"Our staff and our OPD partner collaborated to conduct needs assessments and developed flood situation reports. The inclusion of the OPD in this process added value to our programming by ensuring that the programme design was based on an inclusive approach to address the needs of persons with disabilities" — Pakistan INGO respondent

#### OPDs' involvement in shaping strategic priorities

OPDs' voices and influence within the humanitarian system are still limited, but there is evidence of concerted efforts to strengthen their visibility and leadership. The funders interviewed made deliberate efforts to integrate the views of OPDs in their country humanitarian plans and strategies through various approaches, ranging from one-off consultations to long-term engagements in which OPDs provided technical support to their partners. Examples of these efforts include:

- A UN agency with operations in all three countries explained that it funds OPDs to provide technical support/input when developing its country strategic plans to ensure they are responsive to the needs of persons with disabilities.
- In Pakistan, one INGO explained that it not only integrates OPDs' input in its country humanitarian strategy, but also helps them to influence government-led national and subnational response plans. For example, during the response to the 2022 floods, the INGO invited OPDs to the Pakistan Humanitarian Forum to review the provincial governments' humanitarian response plans and ensure the needs and rights of persons with disabilities were addressed.
- In Ukraine, one donor agency promoted the visibility and leadership of OPDs in several different ways. For example, it provided funding for hiring an expert in disability inclusion who supported the Ukrainian response through a standby

partnership (SBP) led by a UN agency. This SBP provided disability-inclusive technical assistance to the protection cluster; supported the Ukrainian Age and Disability Technical Working Group; developed guidance for humanitarian actors; and built relationships with Ukrainian OPDs. It also worked with other stakeholders to develop a draft disability inclusion framework for consideration by UN leadership. At the Ukraine Recovery Conference, the donor agency collaborated with the Government of Ukraine to host a session on human capital and inclusion and included OPDs on a panel to discuss their priorities.

#### While these efforts are laudable, significant power dynamic issues remain

**unresolved.** For example, international partners are still seen as having more legitimacy, leading to inequitable partnerships with OPDs. UN agencies and INGOs have strategies and policy commitments on disability inclusion but based on the discussions with key informants, the implementation of these commitments is slowed by inadequate resource allocation. Importantly, donors underscore the importance of equitable partnerships but are also constrained by their inability to work directly with OPDs. This is compounded by the fact that donors do not always monitor the quality of partnerships between their partners (INGOs and UN agencies) and OPDs. This is attributed in part to a lack of technical capacity on disability inclusion; inadequate commitment by donors to hold their partners to account on localisation issues; and donors' view that INGOs and UN partners should have the autonomy to determine how they work with local/national partners.

While humanitarian actors may be keen to partner with OPDs, their ability to do so is often constrained by inadequate knowledge of the priorities of the disability movement and the belief that the needs of persons with disabilities should be addressed by disability-focused agencies. This is partly due to humanitarian agencies being unaware of their knowledge gaps. Consequently, they may feel that they are doing a great job promoting social inclusion because they are working with local actors such as national NGOs. However, these local actors are often not OPDs and may not adequately understand the needs of persons with disabilities either. OPDs also vary widely in their mandates, membership, constituencies and geographical reach. Accordingly, humanitarian agencies need to learn about and consider this diversity by partnering with organisations across the diverse OPD movement.

# The need to deliver aid swiftly through trusted partners means that the building of equitable partnerships can often be deprioritised in emergency contexts.

Accordingly, improving coordination structures and local organisations' capacity for programme delivery before a crisis strikes would strengthen the partnerships between national/local OPDs and international responders in the long-term. It would also mean

that international humanitarian agencies and donors do not have to build local capacity and establish partnerships with OPDs from scratch to deliver an effective humanitarian response to each new crisis.

To fast-track progress, actors in the humanitarian space must step up and honour their commitments to localisation frameworks including the Grand Bargain.<sup>26</sup> This requires international responders/funders to transform their systems by simplifying and reducing funding and partnership requirements and processes to enable equitable partnerships with OPDs. The reforms should include efforts aimed at strengthening the capacity of OPDs and empowering them to form partnerships with international responders. International humanitarian agencies/donors need to encourage dialogues, listen to feedback, and work with OPDs to co-create funding and partnership arrangements that work for both parties. Importantly, international partners need to adopt a variety of approaches to working to tailor their support to the needs of OPDs. For example, in our (unpublished) review of partnerships between local organisations and international humanitarian agencies in Kenya, we documented a case in which an INGO established regional support centres to provide technical support to their local partners in areas such as reporting and financial management. This approach facilitated capacity sharing between the INGO and its local partners, ensured complementarity, and provided opportunities for the local partners to learn from the INGO.

### 4.2. Access to funding: selection criteria

#### Selection criteria for funding

Funders adopted diverse modalities to provide humanitarian funding to OPDs. These included:

**Competitive bidding:** This involved inviting all potential partners to apply for funding to implement their humanitarian programmes. Competitive bidding was aimed at promoting accountability and transparency and enabling funders to partner with the best applicants to deliver aid. However, it also created significant competition for funding with OPDs that lacked the capacity to develop quality funding proposals unable to bid. One donor respondent explained that:

"We received a lot of good proposals from CSOs, which focused on marginalised and excluded groups such as persons with disabilities. However, some of the proposals written by OPDs were of very poor quality. So, we could not fund such proposals even though we liked their ideas" — Donor respondent in Ukraine

These sentiments were echoed by several of the OPDS interviewed who emphasised that they were not able to compete for funding with INGOs and large national NGOs.

**Direct funding to pre-certified partners:** Some funders prefer to work with certified partners who they select prior to crisis striking as opposed to making an open call for proposals during the emergency. For example, one donor agency explained that they select their humanitarian partners – which include INGOs and UN agencies – at headquarters level through a competitive bidding process carried out only once every five years. Funding is then only allocated to the pre-certified partners until the next selection cycle takes place (at the end of the five-year period). From the perspective of donors/INGOs, channelling funding to pre-certified partners enables a swift rollout of operations to deliver timely humanitarian aid to save lives. Several of the INGOs and donors interviewed noted that establishing new partnerships takes time and is sometimes not feasible in an emergency context requiring swift action. This is exacerbated by pressure from their head offices to allocate funds as fast as possible during an emergency. One donor respondent explained that:

"Humanitarian funding – unlike development funding – is often characterised by a real rush to get resources out of the door to facilitate the response. However, establishing partnerships with OPDs takes time. It is not the same as channelling funds to a UN agency that already has systems to implement quality interventions." — Donor respondent

This system highlights the urgent need for humanitarian actors to adopt proactive partnership approaches that allow the establishment of long-term partnerships with OPDs as part of their wider emergency-response preparedness activities. Establishing partnerships before a crisis will not only facilitate a swift response during an emergency but will also provide adequate time for OPDs and humanitarian actors to collaboratively address barriers to equitable partnerships, including capacity constraints.

**Reaching out directly to partners:** In all the three countries, some funders contacted OPDs directly to discuss forming partnership for aid delivery. For example, several of the Ukrainian OPDs interviewed were approached by other OPDs from across Europe and the US to partner on aid delivery. Similarly, a few OPDs in Jordan and Pakistan were approached by INGOs who provided them with funds or in-kind donations to deliver to

crisis-affected communities. This approach relied on referrals and the OPDs' prior reputation within the humanitarian system. Consequently, OPDs that were known for implementing quality programmes were more likely to receive funding.

#### **Conditionalities for funding**

#### As discussed earlier, humanitarian funding is mainly channelled through

**international agencies.** In Pakistan and Ukraine, only 2.8% and 1.1% of humanitarian funding respectively went directly to national and local NGOs/CSOs and private organisations in 2022. The proportion of humanitarian funding that went directly to national and local NGOs/CSOs and private organisations was even much lower in Jordan (0.5% in 2022). These trends reflect the challenges that OPDs and other national and local organisations face in accessing funding directly from donors.

#### Access to funding was based on OPDs' ability to fulfil a wide range of

**requirements.** While the requirements varied from one organisation to another, common themes included:

- The geographical reach of the OPD, including their ability to access crisisaffected populations in hard-to-reach areas.
- Internal capacity to implement humanitarian programmes. This included having adequate staff, organisational policies, manuals and equipment.
- Prior working experience with international humanitarian agencies, including an understanding of their programme management and reporting systems.
- Having a robust governance structure and financial management systems to mitigate risks such as fraud.
- Alignment of programme objectives with donors' sectoral and programming priorities.
- Having a good reputation and track record of achievements i.e. a record of the impact of past programmes and donors' ability to verify results on the ground.
- Compliance with government/legal requirements, including having valid registration documents.

These requirements are critical for promoting accountable and transparent management of grants and adhering to the 'do no harm' principle. To fulfil funding eligibility criteria, OPDs must invest in organisational systems and procedures that facilitate effective grant management and programme delivery as well as documenting their achievements and capabilities. While some funders provide capacity-building support to enable OPDs to fulfil their funding criteria, others prefer to work only with OPDs that can meet all the requirements at the partnership formation stage. Accordingly, the eligibility criteria can inadvertently create barriers to funding for OPDs that have capacity gaps such as the lack of a robust financial management system. In Jordan and Pakistan, community-based OPDs were not able to fulfil requirements such as having an office, organisational policies and fulltime employees as they relied on volunteers due to funding constraints. In Ukraine, newly established OPDs struggled to access funding as they were not legally registered with the government and lacked experience of humanitarian response provision.

The funders interviewed acknowledged that OPDs struggle to fulfil their grant requirements and explained that they are already putting in place measures to enhance OPDs' access to humanitarian funding. One donor agency explained this challenge:

"Our funding mainly goes to INGOs and UN agencies that have passed our partner assessment process and acquired a partnership certificate. Getting this certificate is a complicated process and includes requirements that OPDs are not able to fulfil. However, we have adopted new localisation guidance in 2023, which is aimed at addressing this challenge." — Donor respondent

Another donor agency reiterated this challenge, explaining that:

"The requirements for accessing our humanitarian funding directly are quite demanding. The process involves a pre-award survey to assess an applicant's financial and administrative capabilities. It also involves multiple layers of reviews and the ultimate decision to fund a local organisation is made by a contracting officer. However, we are committed to increasing direct funding to local organisations." — Donor respondent

This donor respondent further explained that their agency is actively working on addressing barriers that prevent OPDs and other local/national organisations from accessing their funding. For example, they developed a draft localisation policy, but this had not yet been approved at the time of writing this report. The agency also built a website and organised workshops to explain its funding application and partnership processes to local and national organisations.

INGOs and UN agencies employed several different approaches to enhance OPDs access to funding. These included:

**No-regret approaches:** Some funders waived partnership requirements to enable them to fund OPDs directly. This involved a policy shift in which some INGOs/UN agencies took the risk of funding local organisations that would ordinarily not qualify to be their partners. This 'no-regret approach' enabled the delivery of aid by OPDs and other local organisations to crisis-affected communities that would have been excluded if funders did not ease their partnership requirements. However, it also created financial risks for funders which necessitated closer monitoring of grantees. For example, one UN agency active in Ukraine waived some of its partnership requirements to facilitate quick and direct partnerships with OPDs. The UN agency noted that the waiver was a special case that was necessitated by the urgent need to reach persons with disabilities and other marginalised groups. Interviews with OPDs in Ukraine also indicated that several INGOs relaxed their partnership requirements – particularly at the beginning of the crisis – to enable a swift response. However, stringent partnership requirements were later reinstated by funders, in part due to rising concerns over the transparency and accountability of grant management.

**Dedicated funds:** In collaboration with UN agencies, donors have established humanitarian country-based pooled funds (CBPF) in the three countries to enhance local responders' access to humanitarian funding. In Ukraine, a donor agency established a Civil Society Organisations Fund to enable CSOs to implement interventions that promote inclusive humanitarian responses and recovery. In the 2023–2024 fiscal year, the fund includes eight grants dedicated to OPDs or organisations focused on disability rights. That said, the OPDs interviewed noted that their access to CBPFs is limited and stressed the need for CBPF managers to create awareness on how to access funds and eliminate barriers such as bureaucratic due diligence processes. To enhance OPDs' access, donors must hold pooled funds to account, focusing on three key areas: (1) the extent to which they are carrying out comprehensive and conflict-sensitive needs analyses; (2) meaningful consultation with OPDs; and (3) disaggregating their data to facilitate disability inclusion monitoring.

**Mandating partners to work with OPDs:** At the funding application stage, some funders required applicants to demonstrate how they intended to partner with OPDs and ensure disability inclusion as a pre-condition for accessing funding. While this approach is a significant step towards disability inclusion in emergency contexts, donors must go a step further and monitor the quality of funding that their grantees advance to OPDs to ensure principled partnerships and adequate support to persons with disabilities.

**Including disability experts in selection panels:** Some donors include OPDs and/or persons with disabilities or disability inclusion experts in the panels/committees that

review and approve applications for humanitarian funding. The embedding of disability inclusion expertise within these panels is made to ensure that the needs of persons with disabilities are understood and OPDs are involved in addressing these needs.

**Capacity building:** INGOs provided capacity-building support aimed at enhancing OPDs' ability to access grants. This included various forms of technical support such as assisting OPDs to develop funding proposals and strategies; providing fundraising training; and supporting them to develop internal policies, manuals and financial management systems. However, restricted funding, time constraints and limited capacity all inhibit INGOs' ability to provide capacity-strengthening support to OPDs in emergency contexts.

**Referring OPDs to potential funders:** Some INGOs introduced OPDs to donors, other INGOs and UN agencies, enabling them to access funding.

#### Factors that slow OPDs' access to funding

While efforts are underway to reform the humanitarian system to make funding more accessible to local organisations – including OPDs – significant challenges remain. These include:

**OPDs' limited fundraising capacity:** To mobilise resources for humanitarian responses, organisations need dedicated staff and specific skillsets e.g. budgeting and preparing funding proposals. However, several of the OPDs interviewed either lacked staff with these specialisations or were unable to effectively fundraise as their financial constraints made it difficult for them to attract and retain fundraising managers/officers. In Ukraine, capacity gaps were exacerbated by an acute shortage of staff as most professionals had either left the country due to the war or were headhunted by UN agencies/INGOs that provide better salaries. While a few OPDs worked with consultants to support their fundraising efforts, many of them found this to be too expensive.

"Whenever we approach consultants to assist us in developing funding proposals, they often ask for significant amount of money. Some of them ask for as much as half of the value of the grants that we apply for." — OPD respondent, Jordan

Capacity challenges were reiterated by another key informant in Jordan:

"I previously created a WhatsApp group for OPDs that are similar to ours in the southern area of Jordan. Although I used to share a lot of information on that group, I did not receive a lot of feedback and there was no interaction among the participants. When I asked the participants why they were inactive in the group, they informed me that a lot of them were illiterate and could not read. This is when I started sending voice messages to communicate with them" — OPD respondent, Jordan

This response not only highlights the capacity challenges that OPDs face but also shows how important it is that donors and INGOs adopt the appropriate communication channels when sharing information on funding opportunities with OPDs.

**Inaccessible information on funding opportunities:** Funders often provide information on funding opportunities in print and electronic formats, such as on websites. These are not always accessible, especially for OPD leaders with visual impairments. One OPD respondent in Ukraine noted that:

"People with visual impairments often use a screen reader, but the readers do not read everything. Sometimes donors try to simplify information using pictures, but this does not help as people with visual impairments are not able to see the pictures." — OPD respondent, Ukraine

Language barriers: While language barriers are a common challenge for local organisations, they disproportionately affect OPDs. Given persons with disabilities' historical difficulties in accessing education, many OPDs are led by people who are not proficient in English. Furthermore, several of the OPDs interviewed lacked the resources to hire staff proficient in English.

**Inadequate funder expertise in disability inclusion:** Humanitarian agencies do not always have experts on disability inclusion within their humanitarian teams. To bridge this capacity gap, humanitarian agencies often rely on standby partnerships that enable them to share expertise in areas such as disability. While this strategy can be effective in the short-term, long-term reforms that integrate disability experts in humanitarian programmes through organisational capacity-building efforts are required to ensure humanitarian action is disability inclusive.

**Inadequate OPD understanding of the humanitarian system:** Humanitarian action is still a new area for many OPDs. Their limited understanding of humanitarian principles

and lack of experience in implementing humanitarian programmes make funders less likely to partner with them.

**Higher operating costs than other national/local organisations:** OPDs face higher operating costs, in part due to the reasonable accommodations that they require for their staff and persons with disabilities. However, some funders perceive these additional costs as a sign of inefficiency and are therefore less keen on working with OPDs. This misunderstanding is due to an inadequate understanding of the needs and circumstances of OPDs and persons with disabilities within the humanitarian space.

**Donors' limited capacity to work directly with OPDs:** Some donors have inadequate staffing levels that make it difficult to manage several partners. For example, one donor respondent in Pakistan explained that they were solely responsible for managing the Pakistan humanitarian programme portfolio. In Jordan and Ukraine, donors noted that they faced significant staffing constraints, in part due to centralisation of their humanitarian programming at headquarters levels. As a result, they preferred to deliver large grants through INGOs or UN agencies to sub-grant onto OPDs.

Lack of relationship with funders: Many OPDs are still new and do not have a demonstrable history of their operations and capabilities to show to potential funders. Accordingly, donors must ask themselves if they can trust such new OPDs, if they are legitimate organisations or if they might have links to the government, particularly in conflict-affected communities where the principle of neutrality is key. As a result, donors prefer to partner with well-established INGOs or national NGOs that can work with OPDs as subgrantees and monitor them closely on the ground.

#### Managing financial and safeguarding risks

The prevention of fiduciary and safeguarding risks is critical to implementing quality humanitarian action. Fiduciary risk refers to the likelihood that grants/resources will not be used as intended, and includes corruption, fraud, and the diversion of resources. Safeguarding refers to all actions taken by organisations – including humanitarian agencies and OPDs – to protect their staff from harm and prevent them (staff) from harming others, including recipients of humanitarian aid. In the absence of adequate safeguarding measures, crisis-affected populations can be at increased risk of neglect, abuse and sexual exploitation.

The funders interviewed raised concerns over fiduciary risks such as fraud and corruption, particularly in Ukraine and Pakistan. In Jordan and Pakistan, international agencies had to scrutinise and closely monitor the operations of their local partners to

mitigate terrorism financing risks. They also conducted regular financial audits, spot checks, field visits and programme monitoring and evaluations to mitigate risks. Notably, some funders preferred to only provide small grants. They monitored their (grants) usage closely and considered increasing them only once OPDs made progress in strengthening their capacity.

**Funders conducted due diligence assessments to vet potential OPD partners by identifying risks and capacity gaps and recommending actions to mitigate risks.** From the perspective of funders, due diligence is critical for safeguarding humanitarian principles, ensuring accountability and preventing harm to crisis-affected communities. However, a lack of coordination and any standardised approach to conducting these assessments means that OPDs can be subjected to repetitive, lengthy and tedious due diligence processes. One INGO respondent explained that:

"We usually send to our partners a very long questionnaire with questions relating to issues such as internal policies and systems, do no harm, and gender mainstreaming. The assessments take between two to three months. Our projects start only after the assessments are complete" — INGO respondent, Ukraine

Notably, some funders worked with their OPD partners to develop and implement capacity-strengthening plans to mitigate risks based on the outcomes of due diligence assessments. They provided capacity-strengthening support using a wide range of strategies including training in areas such as safeguarding, and supporting partners to develop organisational policies, procedures and systems to manage risks. However, it is important to note that building local/national partners' capacity to meet international standards on safeguarding – including protection from sexual exploitation and abuse – requires a lot of time and financial resources. Accordingly, such capacity-strengthening support ought to be integrated early in the programming cycle and adequately resourced to ensure partners have the skills necessary to deliver quality aid.

#### Case study: A unique approach to capacity strengthening

One donor agency explained that while it has not yet implemented capacity strengthening in Ukraine where it is currently funding the response through INGOs, it has successfully done so in other countries. For example, in the Central African Republic (CAR), the donor funded an INGO to implement a three-year programme. The INGO worked with a local partner in the CAR to deliver aid. The programme included several capacity-building interventions such as strengthening the financial systems of the local partner. Thanks to this support, the amount of funding from the

INGO to the local partner increased every year due to its improved capacity to absorb and manage grants. By the end of the three years, the local partner was able to independently apply for and secure funding directly from other donors and humanitarian agencies.

**Finally, funders required OPDs to submit regular programme and financial reports to monitor the use of grants.** OPDs acknowledged the importance of this requirement and made efforts to comply. However, regular reporting requires time, specific skills and specialised personnel, which most OPDs lack. In Ukraine, four of the OPDs interviewed faced challenges in preparing financial and programme reports due to inadequate staffing levels and frequent power outages as much of the country's electricity infrastructure has been destroyed. In Pakistan, 10 OPDs mentioned a lack of specialised personnel and skills as one of the main obstacles to fulfilling their international partners' reporting requirements. In Jordan, reporting was a particular challenge for the OPDs that lacked the capacity to align their reporting systems to those of their funders. Overall, these trends underscore the importance of increased investment in interventions aiming to improve OPDs' ability to conduct audits, establish accountability and reporting mechanisms, and manage grants.

#### 4.3. Quality of funding

#### Indirect cost recovery

**Overheads/indirect costs are critical when it comes to OPDs' participation in humanitarian action and strengthening their organisational capacity.** While the provision of overheads is not a panacea for localisation challenges, it is a critical step towards enabling locally led disability-inclusive humanitarian action. Overheads promote effective and efficient humanitarian action by ensuring that OPDs and other local/national responders can strengthen their capacity and prepare for emergency responses. This includes enabling OPDs to fulfil financial obligations such as paying rent and salaries.

**Despite its importance, access to overheads remains a key challenge for OPDs.** In Ukraine, the OPDs interviewed indicated that humanitarian grants rarely covered bank charges, audit fees, allowances for volunteers, transport and logistics, language translation services, and expenses related to reasonable accommodation. In Pakistan, over half (seven) of the OPDs interviewed said their international partners prohibited them from including overheads in their budgets. In Jordan, only four of the OPDs interviewed received funding for their indirect costs. Of these, only one OPD was able to fully recover its indirect costs.

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**OPDs in Jordan have employed various strategies to access additional financial resources for their indirect costs.** This includes raising unrestricted funding through appeals for donations from individuals, organising sports and cultural activities, and establishing social enterprises. For example, one OPD provided short beauty training courses to the public to generate income for its operations. Others operate as membership organisations to raise unrestricted income from membership fees to pay for expenses such as office rent. One OPD respondent explained that:

"Our funding for indirect costs comes entirely from individual donations. The grants from our international partners mainly go to direct programme expenses. This year we had a lot of donations from individuals, and we have used it to cover all our indirect expenses." — OPD respondent, Jordan

**Discussions with key informants show a lack of a standard or transparent way of advancing overheads.** OPDs were not aware of the total amount of funding that was available for the direct and indirect costs, making it difficult for them to determine the extent to which their international partners advanced overheads in an equitable manner. This was compounded by donors' failure to monitor how overheads are shared between their grantees and subgrantees. Typically, some funders provided overheads to OPDs as a set percentage of the grant value, while others advanced it as a negotiated amount or a proportion of OPDs' overall indirect costs (ranging between 10% and 30%). For example, one donor agency allocated 7% of its grants for overheads. However, the donor agency did not have any guidelines on how its partners (UN agencies and INGOs) split the overheads with local/national organisations such as OPDs. Another donor agency highlighted that while it advanced overheads to its global partners (UN agencies and INGOs), it was up to these partners to decide how to share the overheads with OPDs and other local partners.

## The lack of any harmonised approach to cost classification makes it difficult for OPDs and their funders to agree on the cost items that are included in overheads.

Some OPDs opine that overheads should include costs relating to their office rent, equipment, logistics and the salaries of non-programme staff such as accountants, while others think that overheads should also include costs related to capacity development, such as the development of organisational policies. However, overheads were often earmarked for specific indirect cost items that tended to be determined by funders, limiting OPDs' ability to allocate the funds according to their operational and organisational development needs. The extent to which INGOs/UN agencies can advance overheads to OPDs depends in part on their access to flexible funding or on restrictions imposed by donors. Some INGOs passed the same proportion/percentage of overheads to OPDs that they received from donors, while others passed on a negotiated amount. INGOs with unrestricted funding were more likely to pass overheads to their national and local partners. In Ukraine for example, one INGO partnered with a TV station in Germany and mobilised over 10 million euros to finance its response from public donations. This unrestricted funding enabled the INGO to cover up to 100% of the indirect costs of their partners in Ukraine, including those of newly established OPDs. However, this was an exceptional case as the INGO normally covers only a small proportion of its partners' overheads, depending on the flexibility of the funding it receives from back donors.

Inadequate financial support for overheads has negative consequences for OPDs and persons with disabilities. To begin with, it limits the extent to which OPDs can participate in the delivery of aid. For example, several OPDs in Ukraine explained how they faced difficulties in navigating security risks and managing the logistics of delivering aid as they lacked overheads for costs related to transportation, warehousing, and purchasing personal protective equipment for their staff. Lack of funding for overheads perpetuates inequitable subcontracting arrangements and unbalanced power dynamics. It also undermines the OPDs' sustainability by limiting their ability to invest in organisational capacity development, including providing a positive work environment to prevent high staff turnover. OPDs that lack access to overheads are likely to adopt ineffective strategies to survive. These include poor management of security and operational risks, underpaying staff, overreliance on inexperienced volunteers to deliver aid, and redirecting funding from key programmes to cover their administrative costs.

**Efforts to enhance access to overheads are underway, but faster progress is required.** Published in 2022, the IASC guidance on the provision of overheads to local and national partners lays the foundation for better support for indirect cost recovery.<sup>27</sup> However, implementing these guidelines requires commitment and buy-in from funders. Many donors and INGOs still lack regulations to guide the sharing of overheads. This is compounded by donors' failure to incentivise their partners (INGOs and UN agencies) to pass on overheads to local organisations.

**Despite these challenges, some funders are making deliberate efforts to advance overheads to OPDs.** This study documented several best practices in advancing overheads to OPDs in Ukraine. They included:

- One donor agency made an executive decision to cover all its OPD partners' indirect costs as its priority was to support Ukrainian OPDs to sustain their operations and establish adequate capacity to respond to the crisis.
- One OPD received unrestricted funding for its indirect costs. This funding was
  particularly important for the OPD as it was establishing a new humanitarian hub
  that created new expenditure needs. The funding enabled the OPD to fully pay
  for its indirect costs, including office rent, warehouse expenses, and the
  wages/salaries for staff who were not directly involved in project implementation.
  The funding also enabled the OPD to establish a warm room for use during
  winter and an accessible toilet for 17 staff members who are wheelchair users.
- One OPD in Ukraine received unrestricted funding for its overheads, enabling it to strengthen its operations. The funding enabled the OPD to pay for office rent, bank charges, and the salaries of staff who are not directly involved in programme implementation, including its accountants and the executive director. The OPD also used the funds to strengthen capacity by creating a website, developing a fundraising and communication strategy, training its staff in areas where they needed new skills, and hiring a human resources management officer. Importantly, the funding also enabled the OPD to provide psychosocial support to staff who experienced trauma from delivering aid to the frontline of conflict-affected areas.

#### **Funding flexibility**

As rights-based organisations, OPDs' ability to protect persons with disabilities during crises is deeply linked not only to their understanding of needs, but also the extent to which they can adapt their operations to changing contexts. This calls for adaptive programming approaches that must be supported by adequate flexible funding to address the unique needs of crisis-affected persons with disabilities. The donors and INGOs interviewed provided flexible funding – albeit to a limited extent – to enable OPDs to adapt their response to changing contexts. The key strategies used by funders to provide flexible funding included:

- Allowing partners to adjust activity budgets by a certain percentage (ranging between 5%–20% with this range usually set by funders).
- Providing partners with new funds to address emerging needs. Donors using this strategy were not directly funding OPDs. It was consequently down to their partners (INGOs and UN agencies) to provide the same level of flexibility to OPDs.

- Providing unrestricted or softly earmarked funding to ensure flexibility. For example, one donor explained that it provides unrestricted budgetary support for its partners' humanitarian programmes on an annual basis. The partners then decide how to use the funding based on the humanitarian needs assessments they carry out. However, the donor relied on its partners (INGOs and UN agencies) to provide OPDs with the same flexibility as it does not work directly with local organisations.
- One INGO used crisis modifiers to ensure funding was flexible. It allowed OPDs to shift part of the funding they were allocated for development programmes to the humanitarian response during emergencies.

**INGOs/UN agencies' ability to provide flexible funding depends on their access to unrestricted funding.** INGOs that mobilise unrestricted funding through strategies such as public donations or social enterprise have the advantage of deciding how such funds are allocated. Accordingly, they are expected to provide more flexible funding to their OPD partners to adapt their programming to changing contexts. In Jordan, most of the OPDs interviewed were allowed to adjust or reallocate budgets by between 5% and 20%. This flexibility enabled OPDs to address emerging expenditure needs and strengthen their capacity. For example, one OPD in Jordan was allowed to reallocate budgets to capacity strengthening by hiring a researcher and an external programme coordinator. In Ukraine, the majority (eight) of the OPDs interviewed indicated that they had the flexibility to make reasonable adjustments to their budgets (by between 10%–20%) to address emerging needs. However in Pakistan, most of the OPDs interviewed struggled to access flexible funding. Typically, humanitarian grants were earmarked for specific activities with no meaningful opportunities for reallocating funds to address emerging needs.

Earmarked funding limits the programming priorities of OPDs and other organisations that work on disability inclusion to a few activities that are – in most cases – predetermined by funders. This prevents a holistic approach that considers the intersection of needs during crises. Respondents raised concerns over the limited availability of unrestricted funds which constrains the extent to which budgets can be repurposed to fulfil emerging expenditure needs. For example, one OPD in Ukraine applied for funding to purchase generators to heat houses during the autumn and winter of 2022. However, the OPD received the funds in spring when heating was no longer a priority for the target beneficiaries. Accordingly, the OPD asked the funder if the funds could be used for other activities, but this request was rejected and the OPD had to purchase the generators as originally planned. While flexible or unrestricted funding is critical to the effectiveness of any given response, it can be misused in the absence of a robust accountability framework. Accordingly, funders and OPDs must work together to strengthen accountability and transparency in the allocation and management of unrestricted funds to provide effective support to persons with disabilities.

#### **Timely disbursement of funds**

The timely disbursement of funds to local and national responders is critical to the quality and impact of humanitarian action. However, funding does not always reach responders on time, in part due to capacity and administrative bottlenecks. In Ukraine, just under half of the OPDs interviewed received funding on time, enabling them to deliver timely assistance to persons with disabilities. In Pakistan, half of the OPDs interviewed received funding application review and approval processes, slow partnership formation and the bureaucracy involved in opening foreign currency bank accounts slowed OPDs' access to funding in Pakistan and Ukraine, resulting in delayed programmes. In Jordan, most of the OPDs received grants from donors/INGOs on time, enabling them to deliver assistance to crisis-affected persons with disabilities when it was needed.

Funders adopted different strategies to deliver funds to OPDs on time. These included:

**Minimising multiple small tranche disbursements:** Funders acknowledged that disbursing funds to their partners in multiple small tranches often leads to delays as each disbursement is subject to a review and approval process that can be bureaucratic and slow. Therefore, some funders disbursed funds on a quarterly basis, while others disbursed funds in one or two tranches to prevent delays. For example, one donor agency disbursed 80% of the funds to its partners upon signing the contract and the remaining 20% was disbursed after the first disbursement was fully expended. Funders noted that the disbursement arrangement is dependent on the level of financial risk involved. Donors/INGOs were more likely to disburse funds in multiple small traches if their partners had relatively weak financial management systems that created financial risks.

**Establishing rapid-response funding mechanisms:** Some donors have established a rapid-response mechanism that enables them to swiftly disburse funds to their partners. For example, one donor agency in Ukraine had a rapid funding window in which funds were pre-positioned in the accounts of its partners at the beginning of the year. Partners could access the funding within 24 hours through a simplified application and approval process. However, the effectiveness of this approach depended on the ability of the donors' partners (INGOs and UN agencies) to release the funds swiftly to OPDs. In

Pakistan, one donor agency employed a funding mechanism in which they finalised contracts and disbursed funds within 72 hours.

**Simplifying reporting requirements to reduce delays:** Funders often require their partners – including OPDs – to account for previous disbursements before disbursing subsequent tranches. Consequently, delays in OPDs' reporting often lead to delays in them accessing funding. To address this issue, some INGOs/donors reduced reporting requirements. For example, one donor agency exempted its partners from providing detailed reports during programme implementation period in order to access the next tranche. Some INGOs also improved reporting efficiency by providing their partners with technical support to address any issues that were causing delays.

Delays in accessing funding impacts OPDs' ability to plan effectively and sustain their operations. This is particularly a challenge in Ukraine where local/national OPDs are struggling to hire and retain staff as many professionals have left the country due to the war. Delays also have significant impacts on the quality of the response. For example, one OPD in Ukraine explained that due to the destruction of electricity infrastructure and a shortage of generators, it planned to provide households with firewood throughout the winter months. However, due to significant delays in accessing funding, the OPD was unable to provide the firewood until the spring when it was less useful to the affected households. These challenges underline the need for a collaborative effort by OPDs, donors, INGOs and UN agencies to streamline partnership formation processes to ensure efficiency in the approval and disbursement of funding. Furthermore, donors, INGOs and UN agencies need to scale up best practices in the timely disbursement of funding, including those highlighted earlier such as rapid funding mechanisms.

#### Alignment with internal systems

Humanitarian funding must be aligned with OPDs' organisational systems, procedures, and policies to strengthen their capacity to absorb funding. The majority of funders in the three countries prioritised the use of OPDs' existing systems to manage grants and deliver aid, rather than imposing project-based systems. Some funders allowed their partners to decide if they preferred to carry out internal or external audits or evaluations of their funding/programmes, while others promoted the use of simplified reporting systems. However, in some cases OPDs were required to adapt their reporting systems by using reporting templates provided by their funders. While most of the OPDs interviewed in Ukraine reported no significant challenges in adapting their reporting systems, community-based OPDs in Pakistan and Jordan often required technical support to do so.

Aligning funding to OPDs' systems can be more effective if accompanied by capacity-strengthening support. Strengthening and using OPDs' existing systems promotes their sustainability and capacity development as imposing programme-based systems can be expensive and time consuming. While funders are keen on using OPDs' systems, their ability to do so is often limited by OPDs' capacity gaps in areas such as organisational policies, grant management protocols and project delivery systems. Therefore, working with OPDs to strengthen their systems will ensure better capacity to manage future grants and deliver humanitarian programmes. For example, in Ukraine an OPD was supported by its INGO partner to establish a professional human resource (HR) management department by hiring qualified HR officer and developing procedures for hiring and managing staff. Another OPD was supported by its INGO partner to strengthen its financial management system by moving from cash payments to bank payment to enhance transparency in financial management.

### 4.4. Coordination and complementarity

#### **Coordination platforms**

Effective coordination is the cornerstone of timely, inclusive and impactful humanitarian responses. In Ukraine, the main humanitarian coordination platforms include the Humanitarian Country Team, the Inter-Cluster Coordination Group, the Humanitarian NGO Forum, and the Multi-Agency Donor Coordination Platform. In Pakistan, the government established the National Flood Response Coordination Centre to coordinate the humanitarian response to the 2022 floods. Other platforms that facilitated coordination included the Pakistan Humanitarian Forum (led by INGOs) and the National Humanitarian Network (led by Pakistani CSOs). In Jordan, the Jordan Strategic Humanitarian Committee is the main humanitarian coordination platform. Other key platforms include the Humanitarian Donor Group (led by donors), the Jordan International Non-Governmental Organisations Forum (an INGO-led platform) and Jordan National NGO Forum (led by national CSOs). All three countries have a special task force or working group, established in partnership with the UN-led protection cluster with the aim of spearheading disability-inclusive coordination. These are the Age and Disability Technical Working Group (ADTWG) in Ukraine; the Age, Disability and Diversity Task Force in Pakistan; and the Disability and Age Task Force in Jordan.

#### OPDs' participation in the coordination of the humanitarian response

Despite the existence of several coordination platforms, disability-inclusive coordination remains a challenge. Most of the OPDs interviewed were not aware of the existing coordination platforms. Consequently, they seldom participated in national-level coordination and when they did, their influence was limited. Key informants noted that while a few national NGOs are members of the main coordination platforms, there is inadequate representation of diverse groups of local actors such as OPDs, volunteer groups and women's rights organisations. This limits OPDs' voices in the coordination of the humanitarian response, despite their extensive knowledge of local contexts and the needs of persons with disabilities.

The inadequate access to national coordination platforms has motivated some OPDs – particularly those in Jordan and Ukraine – to form their own networks and coalitions to coordinate themselves operationally at regional and local levels. However, these networks and coalitions tend to be relatively new, are often underfunded and struggle with weak leadership. Participation in local OPD networks is contingent on the discussion agenda, personal connections, and availability of resources, including volunteers who host and facilitate discussions among participants. Furthermore, network effectiveness is constrained by OPDs' limited connection with mainstream national coordination platforms.

Humanitarian agencies' limited knowledge of disability inclusion makes it difficult for them to understand how to work with OPDs in coordination mechanisms. Even when OPDs participate in coordination, they tend to be involved in the latter stages when discussions have progressed and key decisions have been made. Accordingly, the onus should be on humanitarian actors to reach out to OPDs and involve them in coordination from the outset. However, OPDs must also organise themselves better and conduct joint advocacy for their inclusion on coordination platforms. Key informants emphasised the urgent need for the establishment of a disability sub-cluster to ensure disability-inclusive humanitarian coordination.

Those OPDs that were able to participate in coordination platforms found them to be useful for sharing information on needs, discussing response strategies, and networking. The participation of OPDs in coordination platforms is important as they play a lead role in the last-mile delivery of aid. This means that they often have a lot of feedback on coordination, including explaining the challenges they face when delivering aid. The coordination platforms also provide OPDs with opportunities to meet donors, UN agencies and INGOs to form new partnerships and access funding. Funders are aware of OPDs' limited participation in coordination and have adopted diverse strategies to promote disability-inclusive coordination. These include:

- Strengthening policy frameworks by building the evidence base on disabilityinclusive coordination and developing guidance and best practices. For example, two of the donor agencies interviewed were working with INGOs and other stakeholders to conduct studies on disability-inclusive coordination in various countries including Ukraine and Jordan. The findings of these studies will be used to inform decisions and actions geared towards strengthening disability-inclusive coordination.
- Providing capacity-building support to OPDs to improve their coordination knowledge and skills. One donor agency was also working with the Disability Reference Group at the global level to provide capacity-strengthening support on disability-inclusive coordination in Ukraine and other countries. The aim of this support is to make the humanitarian system more inclusive and enhance OPDs' capacity to engage in coordination.
- Giving OPDs a voice in decision-making processes by inviting and providing them with financial support to participate in national coordination platforms. For example in Ukraine, one donor agency invited OPDs to the European Humanitarian Forum to speak on disability inclusion. The donor agency also collaborated with umbrella OPDs in Ukraine to conduct joint advocacy across various coordination platforms.

#### **Coordination challenges**

Despite the initiatives highlighted in the previous section, deliberate efforts are urgently needed to break the barriers that prevent disability-inclusive coordination. The key challenges that limit OPDs' participation in coordination include:

- Inadequate understanding of humanitarian coordination systems: OPDs not only lacked information on existing coordination platforms, but also an understanding of how the complex national and international humanitarian coordination system works.
- Humanitarian coordination platforms' lack of knowledge on disability inclusion: This contributes to poor engagement between OPDs and existing coordination structures.
- Lack of reasonable accommodations: Coordination meetings are not always held in accessible venues or accessible by public transport. OPDs' participation is also

constrained by the lack of sign language services, and support for wheelchair users and participants who require personal assistants.

- Language barriers including the use of jargon discourage OPDs from participating in coordination meetings. Typically, coordination meetings are held in English rather than in local/national languages and often no interpreting service is available.
- Resource constraints: effective participation in coordination meetings requires financial resources and specialised staff, which most OPDs lacked.
- A lack of reciprocity in providing data and information: The OPDs interviewed explained that there was lack of reciprocity from INGOs, donors and UN agencies when it came to sharing information on the humanitarian response. Accordingly, OPDs opined that coordination mainly serves the interest of international actors who use existing platforms as an avenue for collecting information, rather than as forums for discussing and agreeing on response strategies.

# 5. Conclusion

The crises in Ukraine, Pakistan and Jordan represented a critical opportunity for humanitarian actors to action their commitments to localisation, while stepping up their efforts to support persons with disabilities who are often left behind when it comes to accessing aid.

International responders adopted various strategies to promote a disabilityinclusive response. These included waiving some partnership requirements to facilitate partnerships with OPDs; establishing dedicated funds for national/local organisations; obliging partners to work with OPDs, including disability experts in grantee selection panels; strengthening OPDs' organisational capacity; and providing opportunities for OPDs to participate in key processes such as needs assessments.

However, the stark reality is that significant challenges relating to power dynamics remain unresolved. Ongoing reforms are being implemented in a small scale and reactive manner, and progress is slowed by resource constraints and long-standing institutional and attitudinal barriers to the localisation of humanitarian action. Taken together, our analysis shows that:

- Equitable partnership approaches are still the exception rather than the norm. Equitable approaches are common mainly among disability-focused agencies and/or funders that have adopted policies on localisation and disability inclusion.
- Limited knowledge of disability inclusion prevents funders (donors, UN agencies, INGOs) from forming equitable partnerships with OPDs.
- International responders and large national NGOs are still seen as having more legitimacy, leading to inequitable partnerships with OPDs.
- OPDs with capacity challenges are more likely to be engaged by international agencies as subcontractors as their capacity constraints limit their ability to fulfil international agencies' partnership criteria.
- OPDs' access to funding is still constrained by several institutional capacity constraints, stringent funding eligibility criteria, and inaccessible information on funding opportunities. Even when funding is available to OPDs, it seldom covers

their indirect costs and is often earmarked, limiting OPDs' ability to adapt their emergency response to changing contexts.

 Disability-inclusive coordination remains a significant challenge. OPDs' participation in coordination is slowed by their limited understanding of national and international coordination systems, a lack of resources, and their inadequate representation on mainstream coordination platforms.

#### Reforming the humanitarian system to ensure better partnerships with OPDs

**requires a proactive approach.** The implementation of major systemic reforms during a crisis response presents significant challenges for humanitarian actors, in part due to limited availability of resources – especially time, staff and funding. Reforms aimed at improving the quality of funding, partnerships, and coordination should be implemented upfront as part of humanitarian actors' emergency response preparedness activities. Importantly, humanitarian actors must continue to reform the system even after a crisis response to ensure sustainable solutions to partnership challenges.

Establishing equitable partnerships with OPDs during emergency response preparedness can make humanitarian action more efficient and inclusive when a crisis strikes. To leverage the benefits of pre-existing partnerships to deliver disabilityinclusive responses, humanitarian actors need to adopt approaches that provide opportunities for building trust and collaborative working relationships with OPDs. This includes investing in strengthening OPDs' and international agencies' capacity as part of the preparedness process to ensure that all partners (local, national and international) have sufficient skills, knowledge, policies, staff and equipment to deliver inclusive humanitarian responses.

Donors have a critical role to play in incentivising humanitarian actors to adopt proactive rather than reactive reforms to eliminate the remaining barriers to equitable partnership with OPDs. This includes funding emergency preparedness processes, localisation programmes and capacity-building initiatives aimed at addressing systemic barriers to equitable partnerships, OPDs' access to funding and OPDs' participation in humanitarian response coordination. Importantly, donors need to work with all actors to document and promote best practices in reforming partnership, funding, and coordination systems before, during and after a crisis. This work will enable OPDs to meaningfully participate in emergency responses.

# 6. Recommendations

## 6.1. Quality of partnerships and participation

#### Recommendations for donors, INGOs and UN agencies:

- Develop, resource and implement policies and guidance on disability-inclusive humanitarian action. To avoid duplication, INGOs, donors and UN agencies could build on and institutionalise existing guidelines on disability, including the IASC Guidelines on Inclusion of Persons with Disabilities in Humanitarian Action 2019.<sup>28</sup>
- Adopt bespoke ways of working to facilitate equitable partnerships with OPDs. This should include transforming systems by simplifying and lessening funding and partnership requirements and processes to enable direct collaboration with OPDs. However, it can be very challenging to implement systemic reforms while simultaneously responding to a crisis. Accordingly, reforms should be implemented as part of emergency response preparedness as they are critical to the development of durable solutions that facilitate equitable partnerships with OPDs.
- Prioritise strengthening OPDs' understanding of the humanitarian system and principles to enhance their participation. It is important to clearly identify and include institutional capacity-strengthening support in partnership agreements to facilitate OPDs' participation in humanitarian action. This should include the provision of technical support to OPDs through – among other things – short training programmes and advisory and coaching sessions.
- Shift from working with OPDs through short-term, project-based agreements that perpetuate subcontracting to long-term strategic partnerships that are based on mutual respect, trust, and complementarity to shift uneven power dynamics.
- Enhance partnership dialogues with OPDs to agree on common standards for joint response operation, responsibilities, reporting arrangements and grant management. This will strengthen OPDs' voices in partnerships and decisionmaking processes.

#### **Recommendations for OPDs:**

- Focus on strengthening their institutional capacity by proactively identifying challenges and working with international agencies to progressively fill capacity gaps.
- Conduct joint advocacy for equitable partnerships and opportunities to play a lead role in the delivery of humanitarian assistance to persons with disabilities.

## 6.2. Funding selection criteria

#### Recommendations for donors, INGOs and UN agencies:

- Enhance transparency and accountability in funding applications evaluations. This should include involving persons with disabilities/experts on disability inclusion in the committees that evaluate funding proposals, providing clear feedback on rejected proposals, and maintaining open channels of communication with OPDs to inform them about available funding opportunities. Persons with disabilities and/or experts on disability inclusion who participate in committees that evaluate funding proposals should be compensated for their work and time as they may not have the resources to facilitate their participation.
- Make funding opportunities more inclusive. This includes simplifying application processes by considering OPDs' limited technical capacity, providing clear application guidelines, and promoting equal opportunities for all organisations. Funding criteria should also be more closely aligned with the needs and objectives of OPDs. This includes considering the accessibility needs of persons with disabilities and being more flexible with grant requirements and processes. For example, funders could accept applications and reporting in diverse forms such as audio or video recordings, rather than requiring everything to be written down.
- Improve the accessibility of funding opportunities by providing information on available grants through a wide range of channels. Information should be provided in accessible formats as some OPDs are led by persons with visual impairments. The use of national/local languages should also be prioritised as well as communication channels that are tailored to OPDs' needs, such as the use of voice notes in different languages for OPD leaders who are unable to read.
- Strengthen OPDs' fundraising efforts by supporting them to document and create visibility for their work, introducing OPDs to donors, and providing capacity-strengthening support to OPDs in areas such as funding proposal development.

Donors should also engage in peer advocacy to promote more inclusive approaches and thus make funding available and accessible to OPDs.

#### **Recommendations for OPDs:**

- Explore alternative sources of funding to reduce reliance on donor funding, including strengthening mobilisation of unrestricted funding through donations by individuals and businesses, and social entrepreneurship activities.
- Collaborate and fundraise jointly with other OPDs and in partnership with INGOs and other national and local organisations. Collaborative fundraising efforts will enable OPDs to share their expertise to enhance their chances of accessing funding.

## 6.3. Quality of funding

#### Recommendations for donors, INGOs and UN agencies:

- Provide overheads as unrestricted funding to OPDs to enable them to use the funds according to their operational and organisational development needs.
- Adopt guidelines to facilitate equitable sharing of overheads with OPDs. The guidelines should include a mechanism for holding INGOs and UN agencies to account, for example, through regular reporting/providing data on how they share overheads with OPDs to ensure transparency and accountability.
- Provide flexible funding to enable OPDs to adapt their operations to changing contexts and humanitarian needs.
- Strengthen efficiency in grant-making processes, including due diligence assessments and the review/approval of funding proposals to minimise delays in disbursing funds to OPDs so they can deliver timely humanitarian aid.
- Enhance OPDs' participation in decisions on funding allocation to ensure transparency and accountability. This means providing OPDs with information on the amount of funding available for the response and involving them in discussions on how to best allocate the funding to ensure a quality response.
- Provide OPDs with training and capacity-building opportunities to enhance their skills in areas such as reporting, bookkeeping and auditing, to enhance their ability to mitigate financial risks.

#### **Recommendations for OPDs:**

- Advocate for improved allocation of funding for overheads from donors, INGOs and UN agencies.
- Work with donors, INGOs and UN agencies to agree on a harmonised approach to cost classification to provide guidance on budgeting and financing indirect costs.

## 6.4. Quality of coordination

#### Recommendations for donors, UN agencies and INGOs:

- Provide capacity-building support to strengthen OPDs' understanding of the humanitarian coordination system. This should include embedding induction sessions for OPDs within coordination platforms, and providing key documents, guidelines, and manuals in accessible formats to enable OPDs' representatives to access information on coordination.
- Hire experts on disability inclusion to support coordination platforms to engage meaningfully and effectively with OPDs. This should include promoting OPDs' participation in coordination meetings through initiatives such as providing reasonable accommodations.
- Provide OPDs with financial resources to facilitate their coordination work. Humanitarian grants should always include a budget for coordination.
- Facilitate equitable representation of OPDs on coordination platforms: while international actors play a key role in coordination, they must create more opportunities for persons with disabilities to be represented in coordination platforms through OPDs. This should include supporting OPDs to take on coordination leadership roles by allowing them to chair or co-chair key coordination platforms and to participate in the development of meeting agendas.
- Schedule coordination meeting as close as possible to operations to reduce the time and financial resources that OPDs need to participate. Where possible, encourage hybrid meetings that allow for physical and virtual participation.

#### **Recommendations for OPDs:**

- Proactively seek information on how the humanitarian coordination system works and how to engage with existing platforms.
- Conduct joint advocacy for seats on coordination platforms at national and subnational levels.

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 Strengthen partnerships with national and international partners by inviting representatives of INGOs, donors and UN agencies to participate in OPDs' operational coordination meetings to facilitate the sharing of information and lessons learnt.

## Notes

<sup>1</sup> UN CRPD, Committee on the Rights of Persons with Disabilities 2018. General comment No. 7(2018) on the participation of persons with disabilities, including children with disabilities, through their representative organizations, in the implementation and monitoring of the Convention. Available at: <u>https://digitallibrary.un.org/record/3899396</u>

<sup>2</sup> UN CRPD, Committee on the Rights of Persons with Disabilities 2018. General comment No. 7(2018) on the participation of persons with disabilities, including children with disabilities, through their representative organizations, in the implementation and monitoring of the Convention. Available at: <u>https://digitallibrary.un.org/record/3899396</u>

<sup>3</sup> Inter-Agency Standing Committee's (Financing Task Team, Localisation Marker Working Group 24, January 2018). Available at: <u>https://interagencystandingcommittee.org/humanitarian-financing-task-team/documents-public/hftt-localisation-marker-definitions-paper-24</u>

<sup>4</sup> Inter-Agency Standing Committee 2018. Definitions paper: IASC humanitarian financing task team, localization marker working group. Available at: <u>https://interagencystandingcommittee.org/humanitarian-financing-task-team/documents-public/hftt-localisation-marker-definitions-paper-24</u>

<sup>5</sup> Inter-Agency Standing Committee 2019. IASC guidelines, inclusion of persons with disabilities in humanitarian action, 2019. Available at: <u>https://interagencystandingcommittee.org/iasc-guidelines-on-inclusion-of-persons-with-disabilities-in-humanitarian-action-2019</u>

<sup>6</sup> World Health Organization 2022. Global report on health equity for persons with disabilities. Available at: <u>https://www.who.int/publications/i/item/9789240063600</u>

<sup>7</sup> Ombudsman of Ukraine, UNPRPD and UNDP 2022. Rapid assessment of the experience of evacuating people with disabilities in Ukraine due to the war in 2022. Available at:

https://www.undp.org/ukraine/publications/study-report-rapid-assessment-experience-evacuating-peopledisabilities-ukraine-due-war-2022

<sup>8</sup> Ombudsman of Ukraine, UNPRPD and UNDP 2022. Rapid assessment of the experience of evacuating people with disabilities in Ukraine due to the war in 2022. Available at:

https://www.undp.org/ukraine/publications/study-report-rapid-assessment-experience-evacuating-peopledisabilities-ukraine-due-war-2022

<sup>9</sup> CBM n.d. Disability inclusive disaster risk management: Voices from the field and good practices. Available at: <u>https://www.cbmuk.org.uk/resource/disability-inclusive-disaster-risk-management/</u>

<sup>10</sup> UN CRPD 2006. Convention on the Rights of Persons with Disabilities and Optional Protocol. Available at:

https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-Persons-with-disabilities.html

<sup>11</sup> Charter on Inclusion of Persons with Disabilities in Humanitarian Action. Available at

https://humanitariandisabilitycharter.org/

<sup>12</sup> United Nations 2019. United Nations Disability Inclusion Strategy. Available at:

https://humanitariandisabilitycharter.org/

<sup>13</sup> Age and Disability Consortium 2018. Humanitarian inclusion standards for older people and people with disabilities. Available at: <u>https://spherestandards.org/resources/humanitarian-inclusion-standards-for-older-people-and-people-with-disabilities/</u>

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<sup>14</sup> IASC 2019. Guidelines: Inclusion of persons with disabilities in humanitarian action. Available at:

https://interagencystandingcommittee.org/iasc-guidelines-on-inclusion-of-persons-with-disabilities-inhumanitarian-action-2019

<sup>15</sup> CBM n.d. Disability inclusive disaster risk management: Voices from the field and good practices. Available at: <u>https://www.cbmuk.org.uk/resource/disability-inclusive-disaster-risk-management/</u>

<sup>16</sup> Development Initiatives 2022. The Ukraine crisis and diverted aid: What we know so far. Available at:

https://devinit.org/resources/ukraine-crisis-diverted-aid-what-we-know/

<sup>17</sup> IMF 2022. Statement by Mahmoud Mohieldin, Executive Director Jordan, Ali Alhosani, Alternate Executive Director for Jordan and Maya Choueiri, Senior Advisor for Jordan. Available at:

https://www.elibrary.imf.org/view/journals/002/2023/049/article-A003-en.xml

<sup>18</sup> WFP 2022. WFP Jordan country brief. Available at: <u>https://reliefweb.int/report/jordan/wfp-jordan-country-brief-august-2022</u>

<sup>19</sup> UNHCR 2023. UNHCR warns of serious consequences for refugees if funding crisis is not tackled now.

Available at: <u>https://www.unhcr.org/jo/24321-unhcr-warns-of-serious-consequences-for-refugees-if-funding-</u> <u>crisis-is-not-tackled-now.html</u>

<sup>20</sup> The OECD/DAC policy marker on the inclusion and empowerment of persons with disabilities. Available at: <u>https://capacity4dev.europa.eu/library/oecd-handbook-policy-marker-inclusion-and-empowerment-persons-</u> <u>disabilities\_en</u>

<sup>21</sup> IDA 2020. Increasingly consulted but not yet participating. Available at:

https://www.internationaldisabilityalliance.org/blog/increasingly-consulted-not-yet-participating-ida-global-surveyreport-participation

<sup>22</sup> START Network et al. 2018. Localisation in practice: the seven dimensions of localization. Available at: <u>https://reliefweb.int/report/world/localisation-practice-emerging-indicators-and-practical-recommendations</u>

<sup>23</sup> Network for Empowered Aid Response 2019. Localisation performance measurement framework. Available

at: https://resourcecentre.savethechildren.net/document/localisation-performance-measurement-framework/

<sup>24</sup> Global Humanitarian Platform 2007. Principles of Partnerships: A statement of commitment. Available at:

https://interagencystandingcommittee.org/other/principles-partnership-global-humanitarian-platform-17-july-2007

<sup>25</sup> START Network et al. 2018. Localisation in practice: the seven dimensions of localization. Available at:

https://reliefweb.int/report/world/localisation-practice-emerging-indicators-and-practical-recommendations

<sup>26</sup> IASC 2016. The Grand Bargain. Available at: <u>https://interagencystandingcommittee.org/grand-bargain</u>

<sup>27</sup> IASC 2022. Guidance: Provision of overheads to local and national partners. Available at:

https://interagencystandingcommittee.org/humanitarian-financing/iasc-guidance-provision-overheads-local-andnational-partners

<sup>28</sup> Inter-Agency Standing Committee 2019. IASC guidelines, inclusion of persons with disabilities in humanitarian action, 2019. Available at: <u>https://interagencystandingcommittee.org/iasc-guidelines-on-inclusion-of-persons-with-disabilities-in-humanitarian-action-2019</u>

#### About GLAD

The Global Action on Disability (GLAD) Network is a coordination body of bilateral and multilateral donors and agencies, public and private foundations as well as key coalitions of the disability movement with a common interest in achieving inclusive international development and humanitarian action. GLAD members meet at least once every year, and work together guided by the Network Strategic Plan, which indicates a set of common goals and work priorities. <u>Read more about the GLAD Network</u>.

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