DISASTERS
EMERGENCY
COMMITTEE

LSE Department of
International
Development

AMPLIFYING THE VOICES OF LOCAL ACTORS IN THE CURRENT LOCALISATION DYNAMIC IN UKRAINE

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ABBREVIATIONS

AAH - Action Against Hunger

AAP - Accountability to Affected Populations

CAFOD - Catholic Agency for Overseas Development

CCD - Collaborative Cash Delivery

CHS - Core Humanitarian Standard

CSO - Civil Society Organisation

DD - Due Diligence

DDPP - Due Diligence Passporting

DEC - Disasters Emergency Committee

DEC MA - DEC Member Agency

GB - Grand Bargain

HQ - Headquarters

ICR - Indirect Cost Recovery

INGO - International Non-Governmental Organisation

KI - Key Informant

KII - Key Informant Interview

L/NAs - Local and National Actors

LLA - Locally-Led Adaptation

MEAL - Monitoring, Evaluation, Accountability, and Learning

NNLPD - National Network for Local Philanthropy Development

OCHA - United Nations Office for the Coordination of Humanitarian Affairs

UHA - Ukraine Humanitarian Appeal

EXECUTIVE SUMMARY

Background

Since the escalation of Russia's invasion in February 2022, INGOs and donors have mobilised to provide life-saving assistance, with Ukrainian CSOs and L/NAs playing a critical role as first responders. This presents a critical test for the localisation agenda, which aims to shift power, funding, and leadership to national and local actors in humanitarian contexts. Transformative partnerships between INGOs and L/NAs built on trust are central to localisation. However, while Ukrainian organisations are instrumental to humanitarian responses, they continue to be marginalised. This is a long-standing issue in global humanitarian action where INGOs, influenced by donor compliance requirements and risk aversion, can perpetuate hierarchical partnerships. As such, the DEC commissioned this research to investigate the link between trust and compliance, and how trust-building can strengthen equitable partnerships and localisation efforts in Ukraine.

Purpose and Scope

This report answers four questions:

1	**What are the main obstacles at the DEC level and among its member agencies that hinder the successful localisation of humanitarian projects in Ukraine?**
2	**What factors and good practices can improve trust between the DEC, its member agencies, and Ukrainian organisations?**
3	**To what extent can due diligence passporting procedures be seen as fundamental challenges of trust?**
4	**Can due diligence and administrative processes be simplified at the level of the DEC and its member agencies? What factors prevent this simplification?**

A **qualitative research method** was used, combining **desk-based research** and 18 **semi-structured interviews** targeting three stakeholder groups: the DEC Secretariat, DEC Members and Ukrainian NGOs.

Main Findings

1. Obstacles to Successful Localisation

Structural and operational barriers include:

Obstacles at the DEC Secretariat Level

- **Structure:** The intermediary model limits direct support to Ukrainian L/NAs.
- **DEC Members' varying approaches to partnerships.**
- **Poor Coordination:** Insufficient cross-membership coordination mechanisms and knowledge-sharing.
- **Lack of capitalising on research:** Unsystematic incorporation of research insights into operational changes.

Obstacles at the DEC MA level

- **Lacking Mutual Accountability and Transparency:** Limited transparency in INGOs' partner selection and funding practices; vertical accountability mechanisms
- **Competition:** Limited funding sources create competition between INGOs and L/NAs, undermining collaboration.
- **Bureaucratic Overload and Structural Rigidity:** Burdensome DD and compliance processes overwhelm L/NAs.

Additionally, wider sectoral dynamics, including different visions of humanitarian work, the mediatisation of corruption and persistent power imbalances, fuel risk-averse practices and the tokenistic inclusion of L/NAs.

2. Factors and Practices to Improve Trust

Trust is strengthened by:

- **Supporting L/NAs' Development:** Capacity-strengthening is most effective when tailored to and co-designed with L/NAs.
- **Long-Term Commitment:** Trust requires multi-year partnerships that provide L/NAs with security and stability to develop leadership and operational capacity.
- **Regular Personal Engagement:** In-person visits and informal exchanges build trust between INGOs and L/NAs.
- **Mutual Accountability:** Mechanisms for L/NAs to hold INGOs accountable.
- **Open Communication and Transparency:** Clarity and fairness of decision-making, information sharing and setting expectations.
- **Coordination platforms:** Enable regular engagement opportunities to help L/NAs shape agendas and humanitarian coordination.
- **Fair Funding for Indirect Costs:** Providing sufficient ICR to L/NAs is critical for strengthening their institutional sustainability.

3. Due Diligence Passporting: A Matter of Trust?

DDPP uptake is constrained by institutional mistrust - focused on how INGOs assess due diligence - rather than by distrust in L/NAs themselves.

- **Sector-Wide Risk Aversion:** The humanitarian sector's deep-rooted risk aversion mindset drives INGOs to maintain control over DD processes, often due to fears of donor backlash or reputational harm.
- **Lack of Trust Among DEC Member Organisations:** INGOS are often reluctant to accept other agencies' DD assessments.
- **Intra-organisation Disconnect:** Within INGOs, tensions exist between field teams, who often favour flexibility, and HQ compliance teams, who enforce rigid DD protocols.
- **Fragmented Compliance Frameworks:** DD processes are complicated by varying legal and donor requirements, limiting INGOs' ability to streamline or standardise passporting across contexts.

4. Simplifying Due Diligence and Administrative Processes

Simplification is achievable through:

- **Harmonisation:** Standardising DD requirements, using tools like the Charter 4 Change DD tool and national platforms, would significantly reduce duplication and improve efficiency.
- **Tiered Approaches:** DD requirements proportionate to funding size and risk level would ease burdens on smaller L/NAs while maintaining risk management.
- **Shifting the Mindset From Compliance to Capacity Strengthening**: Reframing due diligence as a collaborative, trust-building process would create opportunities for INGOs to strengthen partnerships with L/NAs.

Factors which prevent simplification:

- **Bureaucratic Inertia and Structural Rigidity:** INGOs' internal systems are resistant to change, reinforcing outdated practices.
- **Communication Gaps and Slow Knowledge Transfer:** Silos within and between INGOs delay the adoption of streamlined approaches.
- **Lack of Drive for Reform:** Without external pressure or clear rewards, INGOs have limited motivation to overhaul cumbersome administrative systems.

Recommendations

To advance equitable partnerships and localisation in Ukraine and beyond, the report proposes targeted recommendations for the DEC, its members, and the wider sector.

DEC Secretariat:

- Encourage all members to adopt official localisation strategies.
- Support due diligence harmonisation through a mix of incentives and accountability measures (e.g. leveraging tools such as the Charter for Change DD Passport).

DEC Members and INGOs in Ukraine:

- Prioritise long-term partnerships and embed localisation principles into organisational strategies.
- Commit to fair ICR sharing and allow L/NAs greater budgetary flexibility.
- Engage L/NAs in project co-design and advocate their inclusion in decision-making fora.

Wider sector:

- Donors and intermediaries should support the institutionalisation of DD passporting tools.
- INGOs must shift from compliance-driven mindsets to approaches viewing DD as an opportunity to strengthen partnerships and local capacity.
- Commitment to downward accountability through transparent communication and processes.

Conclusion

While the humanitarian situation in Ukraine remains critical, it also offers a significant opportunity for the advancement of localisation within the sector. The DEC and its member charities have made notable strides in localisation through equitable partnership-building, but structural, procedural, and relational barriers remain. By embedding trust-building practices, simplifying administrative processes, and strengthening equitable partnerships, the DEC, its members, and the sector at large can move closer to fulfilling their localisation commitments in Ukraine and future humanitarian contexts.

INTRODUCTION

Since the full-scale Russian invasion of Ukraine in February 2022, international organisations, including the Disasters Emergency Committee (DEC) and its member agencies, have mounted a large-scale humanitarian response. The crisis prompted INGOs and donors to swiftly mobilise resources to deliver life-saving assistance (OCHA, 2025). While this prompt intervention was critical to address urgent needs, it also exposed long-standing power imbalances within humanitarian partnerships, with international actors often leading decision-making while local organisations remained primarily in implementing roles.

As the humanitarian response has evolved, the need for Locally-Led Adaptation (LLA) has gained prominence. Ukrainian NGOs and CSOs have proven their capacity to respond effectively, leveraging local knowledge, networks, and community trust. Yet, despite their pivotal role, they continue to face structural barriers to meaningful participation and leadership - such as restrictive due diligence and compliance requirements, limited access to direct funding, and a lack of trust from international partners.

Ukraine's strong history of civil society engagement and self-organised humanitarian responses presents both a major opportunity and a critical test for the localisation agenda. Ukrainian organisations were among the first responders, showing adaptability and resilience while international actors were still mobilising. However, without substantive structural changes in how international organisations engage with and empower local actors, there is a real risk that localisation in Ukraine will remain a 'box-ticking' exercise.

Recognising these challenges, the DEC has commissioned this study to examine the role of **trust-based and trust-building approaches** in localisation and identify ways to strengthen equitable partnerships in Ukraine. The research explores the following key questions:

1	**What are the main obstacles at the DEC level and among its member agencies that hinder the successful localisation of humanitarian projects in Ukraine?**
2	**What factors and good practices can improve trust between the DEC, its member agencies, and Ukrainian organisations?**
3	**To what extent can due diligence passporting procedures be seen as fundamental challenges of trust?**
4	**Can due diligence and administrative processes be simplified at the level of the DEC and its member agencies? What factors prevent this simplification?**

The findings of this research contribute to the broader conversation on localisation, offering insights that can inform **approaches in Ukraine** and **other humanitarian responses**. At a time when **localisation is both a strategic priority and a moral imperative**, this study provides practical pathways for translating commitments into action both in Ukraine and the wider humanitarian sector. These prioritise trust, equitable resource distribution, and the reform of due diligence processes, to empower local and national organisations to lead effective and sustainable humanitarian responses.

LITERATURE REVIEW

The push for localisation in the humanitarian sector

Formally understood by the OECD (2017) as a "process of recognising, respecting and strengthening the leadership by local authorities and the capacity of local civil society in humanitarian action", humanitarian localisation means better "financing, partnership, capacity strengthening, coordination, recruitment and communication (Roepstorff, 2019). It seeks to address the structural challenges faced by the humanitarian system, long criticised for reinforcing racial hierarchies (Narayanaswamy, 2024) and remaining an exclusive 'club' dominated by Western states and agencies (Barnett, 2021). As a risk-averse, market competition-driven sector, the sector is plagued by collective action problems undermining aid effectiveness (Ramalingam and Barnett, 2010). This means INGOs prioritise upward compliance with donors and intermediaries, with this bureaucratic charge transferred downward to L/NAs (Stein, 2008). As such, they are sidelined from making decisions directly impacting their livelihoods.

The localisation agenda instead recognises the value of local actors as first responders): they possess the local knowledge, legitimacy and networks invaluable for implementing responsive, accountable and flexible humanitarian responses in the hardest-to-reach areas (Barbelet, 2019). Not only are they the quickest to mobilise in humanitarian efforts, but they also have a long-term, if not permanent, presence and interest in "rebuilding and recovery" (Solis, 2023). At the heart of localisation, then, is the need to challenge the structures that perpetuate inequalities. The consensus reached in the 2016 World Humanitarian Summit to "make humanitarian responses more efficient, effective, adequate, inclusive and emancipatory" built on the momentum initiated by the 'Charter for Change' in 2015 (Charter for Change, 2015; Roepstorff, 2019). The following 2016 'Grand Bargain' was a "multi-stakeholder collaboration" emphasising the importance of the 25% flexible humanitarian funding target for L/NAs and the reduction of bureaucratic burdens (IASC, 2016). Lastly, in 2022, the 'Pledge for Change' was launched as a voluntary commitment by INGOs to address power imbalances in the sector through "genuine partnerships", reiterating the responsibilities of INGOs vis-à-vis their partners (Pledge for Change, 2022). However, despite significant efforts to advance these localisation commitments, the implementation of this agenda is slow and needs a comprehensive approach redefining the roles of donors, intermediaries and L/NAs in humanitarian responses (Appendix 4).
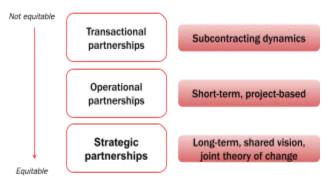
'Successful' localisation: transformative partnerships, the importance of due diligence and trust-building

This research specifically focuses on the partnership approach to localisation, examining due diligence and trust-building challenges. Crucially, various partnership models exist, but not all are transformative. Equitable or transformative partnerships champion mutual trust, shared power, and joint ownership (Christian Aid et al, 2019).

This ensures humanitarian responses are better aligned with the changing needs of affected communities and "promises of community engagement and downward accountability" (Ramalingam, Gray and Cerruti, 2013). Transformative partnerships advance localisation through power-sharing and enhance aid design and delivery.

Due diligence is the first formal test of trust in INGO-L/NA partnerships and should be seen as more than a box-ticking compliance

M. Solis (2023) on the barriers of due diligence: "*If (smaller L/NAs) can't tick all the boxes on a template that wasn't designed for them in the first place, then their chances of receiving funding can be compromised.*"

Not all partnerships advance localisation

Based on AAH's *Ukraine Localisation Evaluation Final Report* (Hill, 2024b)

exercise. Too often, it is conducted as a systematic evaluation of a potential partner's capacities and practices, demanding substantial bureaucratic and administrative effort inaccessible to smaller L/NAs (Solis, 2023). If the quality of humanitarian partnerships is to improve, tackling this is a priority.

As a pathway to improving partnership quality, due diligence passporting (DDPP) seeks to standardise and simplify the vetting process for L/NAs through the mutual recognition of assessments across INGOs and donors (Solis, 2023). The Charter for Change's passporting tool established such a framework (Ibid). The piloting of this tool in Ukraine revealed that due diligence can increase trust and build genuine partnerships if the compliance assessment is used to co-design longer-term capacity-building plans with L/NAs, encouraging mutual learning (Sopruzhynska et al, 2025). Therefore, as the first stage in partnership-building, due diligence plays a fundamental role in creating an environment conducive to effective and genuine localisation. Therefore, there is a need to redefine the role of intermediaries and donors as enablers of equitable partnerships to support in-country partners (Appendix 5).

Advancing 'successful' localisation through transformative partnerships: donors and intermediaries

Taken from Humanitarian Advisory Group's (2021) recommendations regarding the role of intermediaries in locally-led humanitarian action, the IASC's (2007) 'Principles of Partnership', the Charter for Change (2015), Grand Bargain (2016), the Pledge for Change (2022), NEAR Network Principles (2018), and the Core Humanitarian Standard (2024).

Humanitarian localisation in Ukraine

In Ukraine, the rapid onset of the 2022 humanitarian crisis meant that many international organisations had limited prior presence in the region, making partnerships with local actors crucial to accessing hardest-to-reach areas and gaining contextual understanding. As of March 2025, local and national organisations remain primary responders, particularly in high-risk frontline areas where INGOs have limited reach (Stoddard et al. 2021). In this sense, the Ukrainian context was a prime opportunity to advance the localisation agenda and establish long-standing strategic partnerships between Ukrainian NGOs and their international counterparts.

The literature notes this progress, with special emphasis placed on initiatives aimed at strengthening partnerships and increasing the decision-making power of local actors (NGORC, 2024). For instance, World Vision's 2024 report documents the charity's trajectory in prioritising partnerships with Ukrainian national and local organisations as the response was extended (World Vision, 2024). Similarly, the DEC has also integrated local partnerships into its Ukrainian response, recognising its role in enhancing operational effectiveness and sustainability (DEC, 2022). These examples are a snapshot of the efforts made to localise through Ukrainian responders.

However, it is evident that despite rhetorical support for localisation, the tangible impact can be limited and various challenges persist. Notably, as highlighted in the 2022 Ukraine Open Letter, the 'localisation agenda' is sometimes perceived by L/NNGOs as having had little real effect on their operational realities (Richardson, 2022). Thus, while widely endorsed in principle, localisation often remains more of a theoretical commitment rather than a practical reality.

Key opportunities

Identified opportunities to advance the localisation agenda in Ukraine include:

Local knowledge and access	● Ukrainian L/NAs possess valuable local knowledge, enabling better programming and access to vulnerable populations ● L/NAs have access to hardest-to-reach areas, local networks (Alliance UA CSO, 2024; ACAPS, 2023)
Investing in local capacities	● Unique Ukrainian context: robustness of CSO networks and government bodies ● Further INGO support to strengthen national platforms and practices (Mercy Corps, 2024; World Vision, 2024; Hargrave and Bryant, 2024)
Increased participation	**Opportunities for L/NAs** ● Equitable partnership-building ● L/NAs with 'some power to push back' against INGOs. (CMC, 2023)
Changing international context	**Opportunities for L/NAs** ● Withdrawal of INGOs and funding an opportunity to build sustainable humanitarian response strategies ● Support for L/NAs to ensure a smooth transition to recovery.

Recurring challenges for Ukrainian L/NAs

Funding	● Fear of losing funding can prevent Ukrainian L/NAs from voicing concerns or security challenges ● Predominance of project-based partnerships ● Insufficient ICR-sharing and direct funding ● Delays and pre-financing requirements (CMC, 2023; Koch and Rooden, 2024; NGORC, 2024)

Representation	● Insufficient representation in international fora, 'paternalistic' treatment of Ukrainian L/NAs ● Compounded by the language barrier and general inaccessibility of humanitarian terminology (Hargrave and Bryant, 2024; ACAPS, 2023)
Due diligence and partnerships	● Predominant top-down and compliance-focused approach to partnerships ● Downwards transfer of risk from INGOs to L/NAs ● Lack of transparency in capacity assessments ● The difficulty of applying neutrality and impartiality in conflict (ODI, 2019; Global Interagency Security Forum et al. 2020, Sporysh, 2024; Lang and Noe, 2023)
Tokenistic empowerment	● Lack of recognition of local capacities resulting in limited decision-making power ● Limited joint ownership and design of responses ● Risk of localisation becoming a tool of domination and control (Roepstorff, 2019)
Poor coordination	● Mutually-reinforcing with tokenistic participation ● Marginalised L/NAs in decision-making platforms and international fora (Nonviolent Peaceforce 2024)

Calls for action: insights from the 'open letter' on humanitarian aid in Ukraine

The National Network of Local Philanthropy Development in Ukraine has issued two open letters addressing the critical shortcomings in international humanitarian aid distribution. The first, *If Not Now, When?* (2022), urged international organisations and donors to commit to genuine localisation efforts, highlighting the need for direct funding to Ukrainian civil society groups. The second, *Show Your Solidarity with Ukraine Through Action* (2024), builds on these demands, stressing the lack of progress and calling for concrete action rather than mere symbolic commitments. It advocates for greater transparency, increased decision-making power for Ukrainian organisations, shared responsibility for contractual and operational risks, and a shift towards sustainable, long-term partnerships. On the one hand, these letters are powerful advocacy tools and a way for Ukrainian CSOs and NGOs to regain control of the narrative of localisation in their country. They also push INGOs and donors to reform their approaches and ensure aid reaches those best positioned to deliver it effectively (Richardson, 2022; Richardson, 2024). On the other hand, they are also a stark reminder of the minimal tangible progress made by these same international actors to localise through equitable partnerships and fair funding practices.

The DEC's Ukraine appeal

Context

The DEC launched an appeal for donations on March 3, 2022 (DEC, 2025, *Ukraine Humanitarian Appeal)*. The appeal reached £445 million when it closed on the 31st December 2024 (Ibid). Consequently, two decisions were made: to extend the DEC-funded humanitarian response to three years instead of the usual two, and to allocate funds in three instances. The requirements regarding fund expenditure were the same as for standard appeals (DEC Operations Manual, 2024).

DEC's Ukraine Appeal Timeline

Phase 1	Phase 2a	Phase 2b
3rd March 2022 - 31st August 2022	1st September 2022 - 31st August 2023	1st September 2023 - 31st August 2025

*Last date DEC funds can be used: 31st August 2025

Over 80% of DEC member agencies channelled DEC funds to finance humanitarian responses in Ukraine (Appendix 6). The majority will extend their programmes past the DEC's 31st August 2025 cut-off point.

Localisation efforts

The DEC is committed to supporting localisation and its members' efforts which are diverse in their approaches. Importantly, 13/15 DEC member charities are signatories of either/and the Charter for Change, Grand Bargain, and the Pledge for Change (Appendix 6). In 2023, the DEC Operations Manual (2024) was updated to include localisation requirements to be adopted at the next appeals. In 2024, the DEC released a report reviewing members' partnership approaches in the Afghanistan, Pakistan, and Türkiye-Syria appeals, to produce a cohesive strategy for partnership-building (Corcoran and Aitken, 2024). Though not yet formally endorsed by the Board, the report builds on the Humanitarian Advisory Group's recommendations on localisation through equitable partnerships and rethinking the role of intermediaries (HAG, 2021). Establishing a shared partnership vision that clearly defines stakeholder responsibilities is essential to translating the localisation agenda into tangible action.

DEC operations manual: localisation	
Financial practices	DEC funds to cover up to **10%** of local/national partners' **overhead costs**
	Members to "channel at least **25%** of DEC Appeal funds via **local/national partners**"
MEAL	Country-level focus groups of "members' local partners"

Definitions	**Local and national state actors**: "headquartered and operating in their own aid recipient country", not affiliated to an INGO
	Local NGOs/CSOs: area-specific, no affiliation to INGO/ international CSO
	NOT local/national actors: local and international affiliates

*To be adopted from 2023 in all new appeals
*Could not be enforced in Ukraine appeal (started in 2022)
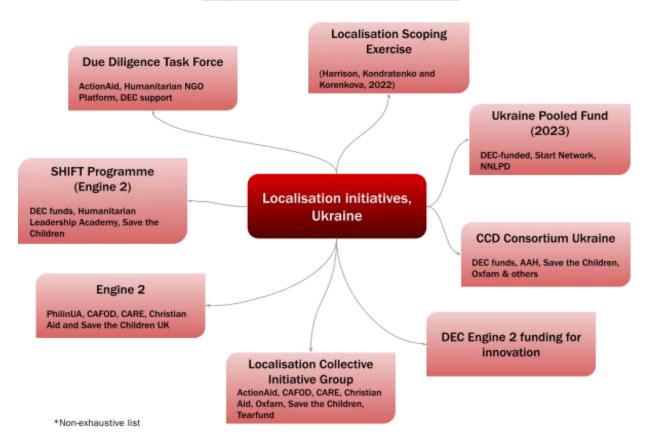(DEC, 2024, *Operations Manual)*

Turning to Ukraine, the DEC commissioned a localisation scoping study which outlined detailed, stakeholder-specific recommendations for the DEC Secretariat, DEC members and the DEC 'localisation collective initiative group' (Harrison, Kondratenko and Korenkova, 2022). It emphasised the need for pooled funding options, due diligence passporting, including the need for a "harmonised verification process", and greater L/NAs' participation in decision-making (Ibid). As a result, the DEC funded its own initiatives as well as those driven by its members, such as the 2023 Ukraine Pooled Fund (Start Network, 2024) and the CDD Ukraine consortium on cash-based localisation models (HII, 2024c). It also organised two 'Big' meetings in Kyiv which brought together member charities and their partners, launched a due diligence passporting tool and approved external due diligence passporting in members' reviews. These efforts underscore the DEC's commitment to Ukrainian actors, while navigating its organisational limits as a membership-based organisation.

Ukraine was hailed as a prime opportunity for the advancement of the localisation agenda. However, no clear pattern of localisation in members' Ukrainian responses emerged, with most combining direct delivery and partnership approaches (Appendix 7). A handful of members collaborated together and with Ukrainian CSO networks, or launched specialised working groups on advancing Ukrainian leadership. For instance, ActionAid co-launched the '*Due Diligence Task Force*' advocating for harmonised due diligence and the creation of an "information-sharing network" (Kiepe, 2024). Importantly, not all members possess an official localisation strategy or commission independent reviews of their localised responses in Ukraine. Oxfam (2025), Save the Children (2024), World Vision (2024), Plan International (Jugran, Santos and Khorunzha, 2024), CAFOD and Depaul' (HII, 2024a), Christian Aid (Christian Aid et al, 2019) and AAH (HII, 2024b) some are examples of good practices. As such, this overview reveals a complex and varied landscape, highlighting the differing approaches and efforts among members to promote localisation through partnership-building, due diligence, and cross-membership collaboration in Ukraine.

DEC, DEC Member initiatives in Ukraine

Localisation Scoping Exercise

(Harrison, Kondratenko and Korenkova, 2022)

Due Diligence Task Force

ActionAid, Humanitarian NGO Platform, DEC support

Ukraine Pooled Fund (2023)

DEC-funded, Start Network, NNLPD

SHIFT Programme (Engine 2)

DEC funds, Humanitarian Leadership Academy, Save the Children

Localisation initiatives, Ukraine

CCD Consortium Ukraine

DEC funds, AAH, Save the Children, Oxfam & others

Engine 2

PhilinUA, CAFOD, CARE, Christian Aid and Save the Children UK

DEC Engine 2 funding for innovation

Localisation Collective Initiative Group

ActionAid, CAFOD, CARE, Christian Aid, Oxfam, Save the Children, Tearfund

*Non-exhaustive list

KEY FINDINGS

This section presents key findings from the interviews, supplemented by insights from the literature review, and categorises the responses according to the research questions.

Q1. What are the main obstacles/challenges at the DEC level and at the level of its member agencies that hinder the 'successful' localisation of humanitarian projects in Ukraine?

Obstacles at the DEC secretariat level

1. DEC structure

One of the most recurrent topics amongst many interviewees is the way the DEC is structured, i.e. having multiple intermediary levels as a feature of its operations. While being a member organisation provides greater flexibility (a noteworthy aspect frequently highlighted by the interviewees), it also comes with inherent deficiencies. Namely, it does not allow for direct funding to local and national Ukrainian organisations (except through pooled funding initiatives), one of the core components of the localisation process. One DEC Secretariat KI explained that "all [DEC] funding has to go through our members, and that creates quite a distance from the local partner", adding that this "structure is a bit of a barrier." The engagement of multiple intermediaries in channelling funding increases administrative complexity and the likelihood of delays, which can all impact the efficiency of humanitarian responses.

2. Varying levels of dedication to partnerships

DEC MAs are diverse: they follow varied perceptions and approaches to localisation and partnerships. While some are committed to localising through equal partnerships, others regard local and national actors (L/NAs) merely as 'implementing partners.'

"With one of the organisations, we were guided by the principles of real partnership... Another experience demonstrated that organisations interfered as much as possible in internal processes... Partnerships are not always easy." (L/NA).

Similarly, when certain tools are created (e.g., DD passporting), DEC MAs respond to them differently. There are those willing to coordinate with others and actively engage in the development and promotion of such tools and those lacking will to join common policies. In this regard, one DEC KI expressed concern

that some INGOs prioritise performance objectives over being 'good' partners, with the DEC confirming this discrepancy in its members' ability and will to localise across the membership (Corcoran and Aitken, 2024). The lack of unity though has direct implications for the Secretariat's efforts to advance localisation within the DEC, and in Ukraine.

3. Lack of coordination

While coordinating 15 different charities with diverse approaches is challenging, improving coordination mechanisms within the DEC is crucial to advance localisation and maximise collective opportunities. The lack of awareness among DEC MAs regarding each other's activities in Ukraine, as highlighted throughout the interviews, suggests a fragmentation in coordination that undermines the overall efficiency of the humanitarian response. DEC MA KIs partly attribute poor information sharing to high staff turnover, but also to inefficient communication from the DEC itself. However, the DEC Secretariat has surveyed MAs on their preferred information-sharing channels and although emails were the most common response, they have not proven to be effective in practice.

The DEC has made efforts to facilitate learning and knowledge-sharing by organising events and discussions. However, engagement has often been low.

Additionally, some DEC MA respondents noted that the lack of in-country coordination meetings contributed to the problem. This was interesting because DEC

"I will say DEC has tried, and sometimes we ask them to do more, but when the event happens, everybody's quite quiet" (DEC MA).

Secretariat KIs explained their apprehension to overburden their already overstretched members with more coordination meetings, and it is worth noting that when DEC teams host meetings or seminars for their members and Ukrainian partners, participation is average. However, the DEC did host two 'Big Meetings' in Kyiv during the Ukraine appeal open to DEC MAs and their local partners, which received positive feedback from both DEC MA interview respondents and internal reports. Some members reported setting up new collaborations with other DEC Members as a result. As such, it is important to note that advancing the localisation agenda within the DEC will necessitate continual investment in efficient coordination mechanisms.

4. Lack of capitalising on research

While the DEC puts lots of effort in research and learning activities, through webinars with MAs and their Ukrainian partners or information-sharing sessions, and engages with different stakeholders, findings from these have not consistently materialised.

Both DEC MAs and L/NAs have expressed frustration at the perceived lack of closing the feedback loop following their participation in research projects.

"There are hundreds of pages of reports from different crises giving always the same recommendations, but they're not taken into consideration because there is no capacity within the DEC to absorb, analyse and take these recommendations into action" - DEC MA.

DEC, however, noted that research and learning processes are followed by a management response by the Programme and Accountability teams, and changes are being implemented, yet with some delays due to the membership structure.

"Stop researching localisation and start investing in making it happen" (L/NA).

Obstacles at the DEC MA level

1. Lacking mutual accountability and transparency

The issue of transparency has been highlighted as a challenge in building equitable partnerships. L/NAs shared concerns about the partner selection process, noting that it sometimes appears unclear or inconsistent.

One KI from L/NAs stated: *"Everyone is interested in transparency in decision-making. So they [international partners] can't tell us why they cooperate or don't cooperate with us? What principles are there? What should not be violated in order not to initiate a partnership? So that everything is clear and there is no hidden diplomacy or bureaucracy."*

According to DEC KIs, deficiency in transparency is further exacerbated by the absence of a comprehensive database of local organisations and their activities. Additionally, the lack of mutual accountability mechanisms, such as those enabling local organisations to monitor INGOs' localisation progress, remains a challenge. While accountability of local partners to international organisations and donors has been largely emphasised, the practice of reverse accountability remains less commonplace.

"This mutual accountability in Ukraine, at least in our experience, is non-existent. It is still vertical" - L/NA.

2. Competition

The current context of the growing scarcity of funding for humanitarian programs in Ukraine (Noe et al., 2025), coupled with INGOs' and Ukrainian L/NAs' dependence on donor funds raises the issue of competition between them despite localisation efforts.

As one DEC member agency representative noted:*"International organisations in this industry are obsessed with being the first ones, being the pioneers, doing things right, doing things better than others despite the fact that the whole sector is actually supposed to support those most marginalised, those without a voice."*

Aware of this, several DEC MAs mentioned that they avoid applying for the same funds as their L/NAs, prioritising instead approaching donors and pooled initiatives only open to larger

"When they start having problems with funding, they will be doing some things themselves, without engaging local organisations" (L/NA).

INGOs. Despite this, there is a lingering concern among L/NAs that INGOs continue to view them as competitors. For instance, one L/NA KI reported that in Zaporizhzhia region alone, as many as 15 organisations could be involved in the humanitarian response and apply for similar resources of funding. KIs also emphasised the vulnerabilities of smaller organisations, with many of them having insufficient capacities to compete over resources with large INGOs. As a result, they become sidelined in humanitarian action.

3. Bureaucratic overload and structural rigidity

A recurrent issue identified by both Ukrainian and MAs is the excessively complex and

"There are many, programs that say we don't restrict anyone, but the criteria are restrictive" (L/NA).

time-intensive administrative processes, particularly at the stage of verification, involving due diligence (DD). International organisations require L/NAs to respond to numerous and repetitive questions. As reaffirmed by Kiepe (2024), approximately 80% of all questions are either identical or highly

similar, leading to unnecessary duplication of effort. This redundancy creates a significant burden for local organisations. When the verification process has more than 300 questions (Sporysh, 2024), even the most capable Ukrainian organisations struggle to respond.

While DEC proposed to lighten administrative processes in the Ukraine Humanitarian Appeal (UHA), and suggested implementing DD among DEC MAs, same cannot be said about other donors. One DEC MA KI noted that INGOs often impose these exhaustive requirements due to stringent compliance standards set by donors (and sometimes as an extra protective measure), which INGOs are forced to downstream to local partners. This administrative overload not only hinders localisation efforts but also diverts L/NAs from essential fieldwork, as well as contributes to their fatigue and burnout.

Wider sectoral and contextual constraints to localisation

While we have addressed challenges at the DEC and member agency level in Q1, it is important to recognise that these organisations operate in a wider humanitarian and Ukrainian context with their own constraints and challenges.

1. Divergent visions of humanitarian work

A related issue inherent to humanitarian localisation and relevant in the Ukrainian context, is the debate surrounding the humanitarian principles and the DEC's guidelines regarding advocacy work. A respondent in the Secretariat reported that the pre-war advocacy-focused background of certain Ukrainian organisations did not align with INGOs' compliance with humanitarian principles. KIs from L/NAs expressed concerns about this and noted challenges related to the application of impartiality and neutrality in an inherently political environment. They advocated for rethinking humanitarian principles, particularly neutrality, and adopting policies at the international level on how to engage with organisations assisting both civilians and the military.

"For example, knowing an organisation fundraises for military needs, the donors instead of rejecting that organisation could demand full transparency of the usage of funds" (L/NA).

Similarly, Hargrave et al., (2024); Miedviedieva (2023) identify the need to find a better balance between the traditional humanitarian principles and Ukrainian organisations' embracing of 'solidarity' as a guiding tenet, as it would allow local actors greater autonomy.

2. Mediatisation of corruption

Another significant obstacle to the localisation of Ukraine is the mediatisation of corruption, with non-media institutions (particularly humanitarian INGOs and donors) following media narratives. Framing Ukraine as an inherently corrupt country by the media contributes to dangerous stereotypes and has a direct impact on the perceptions and subsequent decisions and actions of donors and INGOs insofar as it can inhibit funding due to the perceived financial risks. As one KI from DEC MA stressed,

 "The media has caused this big narrative about corruption and fraud in Ukraine that is supposedly rampant. However, what I doubt is that it is more rampant or dramatic in Ukraine than in other countries."

In addition, such portrayals undermine trust in L/NAs and perpetuate post-colonial perceptions of incompetence, thereby hindering the processes of localisation. One L/NAs KI underscored cases when they have been told: "it is impossible to completely localise, because there is corruption in Ukraine." This narrative prevails despite evidence from the reports, such as by East SOS and Refugees International (2024), indicating that out of 32 interviewed donors, INGOs and UN agencies that conducted audits of their programs, in which they collaborated with local organisations, there were no confirmed cases of corruption among Ukrainian partners, even amid nearly $10 billion of aid since

2022. Therefore, it is crucial not to perceive isolated cases of financial mismanagement as representative of the overall community. Some DEC KIs have noted that "the public expects the DEC to monitor how funds are spent, ensuring they reach people in need and are not used for corruption", and it is important to present them with such information, simultaneously countering the exaggerated narrative of corruption with transparent, evidence-based assessments that recognise the capacity and integrity of local actors.

3. Persistent power imbalances: tokenistic empowerment

Decision-making power remains largely concentrated at the international level with Ukrainian organisations being frequently excluded from decision-making processes. Provided they are invited in the first place, L/NAs report a general sidelining of their contributions within international fora, with one KI from L/NA noting that frequently the achievements and contributions of L/NAs are misrepresented by INGOs country directors. In a similar vein, symbolic progress is frequently presented as achievements. For instance, several KIs from L/NAs denounce that the appointment of a Ukrainian deputy or the registration of an organisation under Ukrainian law is hailed as a tangible success of localisation.

> "There have been cases when, at an event about Ukraine, the country director of an INGO gives a speech about achievements, but those achievements were made by small Ukrainian local organisations. The director of this local organisation might be sitting in the audience, yet she's not even given a chance to speak" (L/NA).

The lack of desire to localise is also professed in international organisations accumulating funding and slowly trickling it down to local organisations in small percentages, hindering both their abilities to swiftly and efficiently respond to the humanitarian crisis and restricting their autonomy.

As highlighted by KIs, only recently UN entities and Clusters started to provide translation for some of the meetings they are holding. The language barrier highlighted here is just one of the many examples vividly illustrating that the space for local partners to grow is very limited, due to the system that they are put in.

These practices underscore the dangers of a superficial localisation that does not result in shifting decision-making power and breaks international commitments to fostering equal partnerships and empowering locally driven responses.

Summary

While significant efforts have been made by the DEC and its members to advance localisation in Ukraine, structural and operational challenges continue to impede progress. Some are specific to the DEC, others inherent to the humanitarian sector. For instance, varying levels of DEC MAs commitment to equal partnerships and bureaucratic

burdens hinder unified action. Compounded by the absence of formal coordination mechanisms, low inter-organisational trust and power imbalances, they undermine the vision of a truly inclusive and locally driven humanitarian response.

Q2. What factors and good practices can improve trust between DEC, its member agencies, and Ukrainian organisations?

Supporting L/NAs' development

Despite the fact that as of 2025, not all DEC MAs have an official localisation strategy for partnerships with L/NAs (Oxfam, 2025), building genuine relationships through capacity strengthening remains of utmost importance. L/NAs, as highlighted in KIIs and NGORC (2024), identified several effective practices, including developing and implementing capacity-strengthening plans collaboratively, providing supervisory support when needed, sharing experiences and reflections, establishing feedback and complaint mechanisms, and delivering targeted, context-specific, and regular offline training instead of generic, one-off online sessions.

> *"It is also crucial to fund Ukrainian providers and those who know the Ukrainian context and have experience in international cooperation, because the courses that internationalists offer are not always applicable"* (L/NA).

Several L/NAs KI also spoke of the lack of a "differentiation in learning", highlighting the importance of a tiered and tailored approach to capacity strengthening. According to L/NAs, this would offer greater value than developing generalised plans. Hence, listening to partners' needs, clearly recognising where organisations can and cannot add value (Oxfam, 2025) and ensuring that capacity strengthening is primarily 'owned' by the L/NA, rather than being driven by an INGOs, (Sopruzhynska, L. et al., 2025) would be crucial in this regard.

Long-term commitment

Interviews revealed a discrepancy in the perceived commitment to long-term partnerships between the DEC Secretariat, DEC MAs, and L/NAs. While DEC MAs expressed intentions to continue working with partners in Ukraine beyond the appeal, L/NAs reported that partnerships often remain short-term. This concern has been consistently raised in L/NA interviews, appeal letters (NNPLD, 2024), reports from L/NAs (East SOS and Refugees International, 2024), and international studies (GISF, 2020). However, interviewees across all the stakeholder groups linked trust to time, emphasising that trust takes time to develop in a partnership. As one L/NA noted, *"Trust may not be there at the beginning of cooperation or it can disappear after some challenges... It takes time to build it"*. Oxfam (2025) reasserts that partnerships need to be continually invested in, as they are "neither quick nor easy."

Regular personal engagement

Regular in-person visits were highlighted as crucial by all KIIs. When international partners visit the ground, they gain a better understanding of local realities, which is fundamental to building trust. Local organisations also underscored the necessity of not just monitoring and learning visits, but also informal check-ins (visits that are not framed solely as audits) that allow all parties to verify progress and openly discuss challenges. Similarly, investing in people-to-people contacts between DEC MAs and L/NAs has been highlighted as a necessary measure by both DEC MAs and

> *"When international partners visited us, they communicated [with us], went to the field. It greatly strengthened our interaction and trust"* (L/NA).

L/NAs. It was said to form the foundation of timely and effective interactions. As one L/NA noted, *"Trust was built at the level of our teams, that we, as people, trust each other and are ready to cooperate."*

Mutual accountability

While asymmetrical accountability still accounts for much of the partnerships between international organisations, including DEC MAs and L/NAs, it is important to reiterate that trust grows when both sides are accountable to each other. As suggested by several L/NA KIs, the creation of an accountability mechanism for tracking DEC MAs progress on localisation commitments would greatly contribute to trust-based partnerships. In this way, not just local organisations would be held accountable, but also their international counterparts.

> *"It is written how much time is allocated for preparing reports, but the time for their checks is not recorded anywhere. Accordingly, such processes affect receiving the funding and subsequently ceasing the activities"* (L/NA).

Open communication and transparency

Transparent, open, and fast communication should become the benchmarks in trust-based partnerships. Several L/NA KIs emphasised the importance of their international partners sharing the decision-making criteria, funding allocation methods, reasons for selecting or rejecting local partners, amongst other aspects.

Additionally, several L/NAs spoke of the need for information-sharing and establishing open procedures for getting to know smaller organisations, which may not necessarily be aware of/have resources for undergoing formal processes.

> *Small organisations are not always aware of these calls for proposals, which ones are closed and which ones are open"* (L/NA).

Considering the influence of INGOs headquartered in the West and their role in managing funding, several DEC MA KIs highlighted the importance of recognising this dynamic, discussing it with local partners, and collaboratively exploring ways to address it. Additionally, the need for communicating expectations what can and cannot be achieved was mentioned by DEC MA KIs. Open and honest dialogues could contribute to a more balanced partnership and help foster greater trust and equity.

Coordination platforms

Interviews with both local and international organisations revealed that establishing or using existing platforms for ongoing dialogue between DEC, its MAs and L/NAs is of paramount importance for all parties.

One L/NA KI noted that since DEC, as a funding agency, is perceived as being disconnected from on-the-ground realities, it is important that: "*They [DEC] need to either create more spaces for people, including local partners to come to participate, be consulted or if they don't want to bring people to London, come more often to the field.*"

In this regard, several KIs commended DEC for establishing coordination spaces similar to the two 'Big' meetings in Kyiv, bringing together member charities and their partners to share information and facilitate connections among members and L/NAs. The advantages of improved coordination ensure resources are used efficiently, avoid duplication of efforts, and allow L/NAs to play a larger role in decision-making, which can strengthen trust and improve the overall effectiveness of aid.

Fair funding for indirect costs

Fair funding is equally important in strengthening trust between organisations. Throughout the interviews, local organisations have frequently emphasised that indirect cost recovery is essential for covering such critical organisational aspects as office rent, positions like HR (which often do not go into the general budget) or duty of care expenses like bulletproof vests and medical kits for frontline workers. Although the DEC made progress in 2023 by permitting greater indirect cost recovery, L/NAs have highlighted the importance of DEC MAs following through on this commitment to support their ongoing capacity. As underscored by DEC KIs, moving beyond a narrow focus on project-based funding and providing overhead (e.g., 10% of the program budget) allows local partners to decide how to best use the funds, increasing their agency and voice.

"*That flexibility is hugely important in supporting local organisations. It's not just about voice it's also about power and decision and agency*" (DEC Secretariat).

Summary

The findings convey that while the DEC and its members trust their Ukrainian L/NAs, progress is undermined by short-term partnerships, fragmented capacity-strengthening efforts, inconsistent personal engagement, lack of two-way accountability, and opaque decision-making and funding processes. It is apparent that trust hinges on more than procedural checks. Interviewees and literature highlight that tailored capacity-strengthening, regular in-person exchanges, fair funding (particularly ICR), transparent and responsive communication channels and mutual accountability, are the keys to building trust-based and long-term strategic partnerships.

Q3. To what extent are challenges in due diligence passporting procedures fundamentally challenges of trust?

DD passporting (DDPP) presents a significant opportunity for equitable partnerships, with due diligence serving as the first test of trust in a partnership—an important opportunity for building power-sharing relationships from the outset. Reducing duplication and freeing up time can create deeper engagement around shared risks and opportunities and mutual capacity-strengthening (Sopruzhynska et al., 2025).

> "Our level of trust with local partners is probably much higher than the levels of trust of other international organisations because we have made very strong political commitments to local partners" (DEC Member).

However, in Ukraine, only three DEC MAs have implemented passporting. The core challenge is not a lack of trust at the program level between members and local partners, but rather institutional distrust - specifically, confidence in how *others* conduct due diligence.

In fact, MAs and L/NAs in Ukraine express strong mutual trust, with each affirming confidence in their collaboration.

Instead, MAs hesitate to cede control due to differing risk tolerances and rigid compliance frameworks, preventing standardisation and coordination. Greater trust in shared processes is essential for the full realisation of DD passporting's potential.

Sector-wide risk aversion

The adoption of due diligence passporting is hindered by the sector prioritising risk mitigation and compliance. Organisations hesitate to rely on external assessments, as compliance teams prioritise ensuring that due diligence meets their own internal standards and donor expectations.

This preference for control is not necessarily about distrust in local partners but rather about managing risk according to individualised criteria. As one member put it: *"It's*

'computer says no' - not about the program, but the compliance stuff." Another echoed, "It's a trust but verify approach."

Organisations fear that if they accept an external assessment, they may be held accountable for potential failures outside their control. This results in each organisation maintaining its own verification process, even when overlapping with others, undermining the effectiveness of passporting.

Lack of trust among DEC member organisations

Building on this trust deficit, another major barrier to passporting's success is the reluctance of MAs to accept due diligence conducted by others. Concerns about differing standards and risk management practices lead agencies to view passporting as an additional tool rather than a comprehensive solution.

"We do not trust the quality of work of other international organisations, we do not trust the quality of their assessments, we do not trust the way they target the right people for the right reasons, and so on. It's a huge issue" (DEC MA).

This mistrust is exacerbated by limited cross-agency communication about due diligence processes, as a lack of visibility into others' assessments reinforces hesitation, prompting organisations to rely on their own verification systems and perpetuate duplication and administrative burdens.

This is echoed by Sopruzhynska et al. (2025) in their *Due Diligence Passporting Report*, which states that while discussions about due diligence passporting tools are taking place within INGOs, little concrete action has been taken to implement them. They argue that this reflects a broader issue of trust between INGOs - "*specifically, their willingness to accept assessments conducted by other organisations.*"

However, it is important to note that there are also instances where DEC MAs have demonstrated trust in each other's due diligence assessments, with a couple explicitly mentioning passporting in DEC Internal Reports. This suggests that some organisations, usually those already collaborating in other fora and networks, are open to collaboration.

"[Passporting] accelerated the due diligence process for new partners, by using the previous due diligence outcomes that were conducted by other INGOs" (DEC MA).

Intra-organisation disconnect

Even within individual DEC member organisations, there are differences in risk perception between headquarters' legal and compliance teams and program teams on the ground. Compliance teams, being more risk-averse, tend to favour stricter controls, while field teams recognise the need for more efficient due diligence processes.

Many passporting initiatives originate from localisation advocates in the field, who work informally to implement the system. However, strict verification controls remain the norm at headquarters level, whereas field teams emphasise efficiency and partnerships.

"The legal and compliance departments don't trust the program, people within organisation and then the different organisations don't trust each other" (DEC MA).

The disconnect in localisation efforts largely stems from the absence of official localisation strategies or endorsed partnership principles among members, as highlighted by various reports. For instance, AHH's *Localisation Evaluation Final Report* (HII, 2024b) notes a lack of unified understanding of the organisation's 2023 Local Partnership policy for localisation. Similarly, the CCD Ukraine Consortium with Save the Children (HII, 2024c) identified gaps in the application of the Localisation Framework, leading to missed opportunities in achieving strategic objectives.

All DEC members follow the Core Humanitarian Standard (CHS) criteria which includes elements of localisation through emphasis on decision-making and AAP, but does not explicitly refer to it. The CHS is a guide to localisation principles and core components, but not a localisation strategy in itself. It is not an overt incentive to directly invest in localisation as a coherent strategy for MAs.

Fragmented compliance frameworks

Structural and regulatory factors further exacerbate the difficulty of establishing a unified passporting system. International donors and DEC members' due diligence protocols are context-specific; shaped by national requirements. Different regulatory environments and risk assessment methods make it difficult to implement a single, streamlined process. Organisations themselves must comply with external legal obligations, making it harder to trust a standardised approach that

If we tell them [international organisations operating in Ukraine] to make a unified system at the level of Ukraine, what should their headquarters do? They still need to check what they check in other contexts. And for them, that turns into a double burden" (L/NA).

may not align with their specific requirements. For international organisations implementing projects in Ukraine, aligning due diligence at the country level does not eliminate the need for compliance at the headquarters level.

Summary

While organisations may not inherently distrust their partners, they often lack confidence in standardised verification processes and in the commitment of others to uphold rigorous standards. Reluctance stems from control over risk management, worsened by fragmented compliance frameworks, legal variations, and limited investment in localisation.

Q4. Can due diligence and administrative processes be simplified at the level of DEC and its member agencies?

Harmonisation

Harmonisation was unsurprisingly mentioned as a priority by the three stakeholder groups. A unified due diligence passporting system would significantly reduce duplication and inefficiencies, allowing for a more streamlined process across the DEC and its members.

> *"A well-functioning due diligence 'passporting process' is of benefit"* (DEC MA).

Members noted that a vast majority of due diligence requirements are similar across organisations. Standardising and passporting these shared components across the member agencies - at a minimum - could simplify processes while still allowing flexibility for organisation-specific checks. This could also pave the way for full harmonisation in the long run.

However, harmonisation should not mean starting from scratch. Rather, the key is to link existing initiatives and build on what is already working, rather than duplicating efforts - such as the Charter4Change Due Diligence Passporting Tool and the Due Diligence Task Force in Ukraine. Achieving this requires stronger communication and coordination - not only between the DEC and its members but also between DEC MAs and across the sector.

As Sopruzhynska et al. (2025) highlight in their Due Diligence Passporting report, while a standardised global tool can serve as a foundation, effective implementation requires contextual adaptation beyond mere language translation. The criteria themselves must be flexible to accommodate diverse operational realities. The Charter for Change's tool exemplifies this approach, offering a structured yet adaptable framework that avoids a rigid, one-size-fits-all model.

Tiered approaches

Additionally, introducing a tiered DD system, commonly cited by members and local organisations, would ensure that DD requirements are proportionate to funding size and risk level. For instance, smaller grants and well-established partners could undergo lighter assessments, while higher-risk projects require more scrutiny. By embedding a risk-proportionate approach, due diligence could become more adaptive and context-specific, ensuring compliance while reducing unnecessary administrative burdens.

> *"A local organisation should not have to go through the same number of checks and balances if you're sending them 10 grand versus if you're sending them 10 million"* (DEC MA).

Shifting the mindset: from compliance to capacity strengthening

Finally, for the simplification of DD and administrative processes to be truly effective, it is important to shift the way due diligence is perceived. Instead of being treated as a pass/fail test, DD should be seen as a snapshot of an organisation's current state to guide capacity-strengthening efforts.

This shift in focus would place partnership-building at the centre of due diligence.The goal should not only be to streamline processes but to ensure they are meaningful, flexible, and supportive of localisation efforts.

Sopruzhynska et al. (2025) highlight the need to rethink DD scoring - not as a measure of failure, but as an "opportunity to support growth." However, much of the sector's language remains compliance-driven, reinforcing rigid, top-down processes.

Findings from internal reporting show that MAs are working to change this. For instance, one has adopted a "safe to fail" approach which promotes flexibility and learning, with the recent pilot of the Charter for Change's Due Diligence Passporting (DDPP) tool, seeking to balance compliance with capacity-building (Sopruzhynska et al, 2025).

Given that INGOs must comply with international standards like the Core Humanitarian Standard (CHS), their partners must do the same, adding complexity to localisation efforts. The challenge is finding a balance - ensuring capacity-strengthening is not just a means to enforce compliance, but a tool for empowering local and national actors (L/NAs) in the long term.

What prevents due diligence and administrative processes

Bureaucratic inertia and structural rigidity
Entrenched administrative systems create inefficiencies

Communication gaps and slow knowledge transfer
Silos and lack of coordination lead to redundant efforts

Lack of drive for reform
Limited incentives for change reduce motivation

What prevents simplification?

Bureaucratic inertia and structural rigidity

Members operate within deeply entrenched administrative systems, where complex internal structures, multiple intermediaries, and rigid approval hierarchies create inefficiencies. Reforming due diligence processes requires high-level institutional commitment, yet existing workflows and compliance mechanisms often reinforce the status quo. Even when due diligence passporting is recognised as a way to streamline processes, bureaucratic inertia slows adoption, sustaining the preference for individualised verification.

Communication gaps and slow knowledge transfer

A lack of coordination and transparency across members and internal teams further complicates due diligence simplification. Although it must be noted that some members communicate effectively, many members operate in silos, with limited sharing of best practices or lessons learned. Knowledge transfer between headquarters and field teams is often slow, with compliance teams favouring rigid control while field teams advocate for more adaptive, risk-based approaches. This disconnect leads to redundant verification efforts, inconsistent application of due diligence frameworks, and missed opportunities for collaboration. These communication challenges, as highlighted by CAFOD (HII, 2024a), indicate the need for improved internal coordination and collaboration, both within organisations and with partners.

> "The information sharing between the UK and in Ukraine is not always smooth. There's staff turnover regularly, which sometimes prevents the right information from being shared at the right moment" (DEC Secretariat).

Lack of drive for reform

Without strong incentives and sustained external pressure from the DEC Secretariat and its members, there is little motivation for organisations to reform due diligence procedures.

A key barrier to reform is that institutional change often hinges on demonstrated success. As L/NA noted, "At the level of an idea or some existing tools, a certain number of organisations will come only when they see that it really works."

The implementation of due diligence passporting (DDPP) in Ukraine reflects this reality. Despite its clear potential to reduce duplication and increase efficiency, it remains largely the result of individual efforts rather than institutional commitment. As one DEC MA put it, "DD passporting has mostly been the work of individuals committed to localisation on the ground."

This underscores a fundamental challenge: without high-level endorsement, bottom-up initiatives struggle to gain traction. While decentralised efforts can drive innovation, they are not enough to achieve systemic change.

Summary

Due diligence at the DEC and its members can be simplified through harmonisation, risk-based systems, and a shift from compliance to capacity-strengthening. However, bureaucratic inertia, poor coordination, and lack of drive hinder progress. Meaningful reform requires institutional commitment and sector-wide collaboration to make due diligence more efficient and supportive of localisation.

RECOMMENDATIONS

Internal to the DEC

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Support equitable partnerships
- **Encourage all members to adopt official localisation strategies and partnership principles.**
- **Board endorsement of the 2024 Partnerships Vision** to provide clear direction, strengthen accountability, and define roles.
- **Develop a local partners database** to align with DEC internal reports and improve accessibility.

Encourage DD harmonisation
- **Adopt a carrot-and-stick approach for members** – Incentivise the adoption of DD processes while also challenging those who are not utilising tools.
- **Leverage member and sector localisation expertise** (e.g., reports, best practices) to enhance strategies.
- **Utilise existing Tools and initiatives**, such as *Charter for Change DD Passport Tool* and national DD initiatives already in place.
- **Implement a tiered DD approach** based on funding size and risk.

Communication and coordination
- **Host nationwide coordination meetings** at the start of an appeal, modelled on successful large-scale events (e.g., Kyiv) to engage all stakeholders.
- **Continue to facilitate learning events** (e.g., seminars, knowledge-sharing).
    - Led by a permanent **collective initiative group** (building on the Ukraine model for broader application).
    - **Ensure local partner inclusion**.

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<tr><td align="center">Medium and Long-term Actions</td></tr>
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Strengthen accountability
- **Strengthen DEC's internal accountability** by ensuring **adherence to past recommendations** from commissioned reports.
- **Provide tailored support to members** in enhancing accountability and implementing localisation.
    - **Ensure alignment** with international obligations and commitments.
    - **Hold members accountable** to their own localisation principles.
    - **Encourage formal adoption** of international localisation commitments.

Advancing humanitarian localisation: Ukraine

High Priority

Due diligence - INGOs
- **Fund and institutionalise existing DD platforms** (e.g., PhilanUA, C4C DDPP).
- Review and **accept prior assessments** where possible.
- Implement a **tiered DD system**.

Equitable partnerships & local leadership - INGOs
- **Engage Ukrainians in co-designing projects**, employ local staff.
- Be prepared to **act in alignment with existing national plans, embrace learning from L/NAs**
- **Strengthen local leadership** by supporting L/NA participation in national (ensuring accessibility) and international coordination meetings.
- Make **long-term capacity strengthening** an integral part of DDPP, transition and exit strategies.
- Prioritise **long-term partnerships** (2+ years).

Funding - INGOs and donors
- **Directly fund Ukrainian L/NAs** and national funds (e.g., Ukraine Pooled Fund)
- **Share ICR** (minimum 10%).
- Allow for L/NAs **rapid budget reallocation** in response to urgent needs.
- Ensure continuity by **assisting L/NAs in securing funding post-cooperation**.
- **Avoid competing with L/NAs for funding**; leverage separate donor sources.

Medium and Long-term Actions

Accountability & transparency - INGOs & donors
- **Establish transparent processes** for engaging L/NAs (e.g., decision-making criteria, funding allocation, reasons for rejection).
- **Establish and implement a localisation action plan,** and report on progress.
- **Ensure mutual accountability** by establishing two-way mechanisms and sharing responsibility for risks through contract-based commitments.

Local action for sustainability - L/NAs
- **Shift** from short-term mindset to **proactive, long-term localisation**.
- **Establish independent audits** for evaluating INGOs localisation commitments and **clarify mutual obligations**.
- **Conduct self-assessments** to identify needs and **develop capacity-strengthening plans** for engagement with INGOs and donors.
- **Promote localisation tools** and push donors to **reduce bureaucracy**.

Advancing humanitarian localisation: general

High Priority

Due diligence and DDPP: roles of intermediaries - Donors, INGOs
- **Pledge for Change** to be applied consistently by INGO signatories and to be adopted by non-signatories as the principle framework for partnership-building in localisation.
- Recognition of DD as the first **test of trust** in a partnership: an important opportunity for trust-building from the outset.
- A **shift in mindset** toward DD approaches that prioritise capacity-strengthening opportunities rather than focusing solely on compliance.
- Investment in **existing and centralised DDPP tools**: international tools such as the C4C DDPP tool, or emerging national ones in specific humanitarian contexts.

Real progress in fair financial practices - Donors, INGOs, accountability platforms
- Charter for Change, Grand Bargain and Pledge for Change: to be adopted consistently by signatories and non-signatories.
- **Non-competition with L/NAs**: dedicated funding pools for L/NAs.
- Substantial increase in **direct funding** to L/NAs, as per the Grand Bargain.
- Substantial increase in **ICR Sharing, flexible funding** models.

Medium and Long-term Actions

Accountability and transparency for localisation - Donors, INGOs, L/NA partners
- **INGOs' investment in localisation and partnerships**: official strategies, commitments.
- **Accountability to commitments**: sector-wide and downward to partners.
- Ensuring INGOs possess constructive feedback and complaints mechanisms for their partners: closing the **feedback loop.**

Local leadership in international fora - Coordination platforms, CSO networks
- At all stages of a crisis: **humanitarian emergency, recovery and peacebuilding**.
- **Empowering participation**: beyond tokenistic inclusion, decision-making powers.
- Engagement with **local context and expertise**.
- **Ensuring accessibility for L/NAs**: beyond translation, including engagement with **local context and expertise**.
- **Stronger advocacy** from INGOs and CSO networks to donors, UN, states, etc.

CONCLUSION

The humanitarian response in Ukraine presents both an opportunity and an ongoing challenge for advancing localisation. Within the DEC, efforts have focused on fostering equitable partnerships between L/NAs and member charities. A key finding of this report is that trust is both a prerequisite for genuine partnerships and essential for overcoming structural and operational barriers. These include inconsistent localisation approaches among DEC members, leading to inefficiencies and missed collaboration opportunities. Weak coordination further prevents the development of a unified approach, while limited transparency in partner selection and funding processes restricts Ukrainian L/NAs from engaging as equals. Additionally, rigid compliance requirements and bureaucratic hurdles place a heavy burden on local organisations, diverting resources from their humanitarian work - work they will continue long after international actors withdraw. These challenges contribute to the tokenistic inclusion of L/NAs, reflecting broader power imbalances and competition that hinder collective action between donors, INGOs, and L/NAs, as well as among INGOs themselves.

Crucially, trust-building must be embedded in DEC MAs' institutional frameworks and localisation strategies, not treated as an afterthought. In Ukraine and other crises requiring local partnerships, this process begins with due diligence. While INGO verification and partner selection can reinforce top-down power structures, due diligence can also serve as a trust-building tool, fostering mutual learning, flexibility, and stronger accountability to affected populations. When paired with jointly designed capacity-strengthening strategies, due diligence creates partnerships based on trust and long-term collaboration, rather than rigid oversight. Regular in-person engagement is also vital to strengthening relationships and ensuring mutual accountability mechanisms empower local actors rather than treating them as passive implementers.

Due diligence passporting and tiered approaches have been identified as potential solutions to excessive bureaucracy, allowing INGOs to accept pre-existing due diligence assessments and adjust compliance requirements based on partnership scale and risk level. However, implementation remains hindered by INGOs' mutual mistrust and risk-averse practices, complicating efforts to shift power to local actors. Strengthening trust not only between DEC MAs and their local partners but also among INGOs themselves is critical for improving partnership quality and addressing collective action challenges across the sector.

Ultimately, due diligence should not be seen as a compliance hurdle, but as a core element of localisation - ensuring decision-making power and financial autonomy are meaningfully transferred to local partners. Achieving this requires a fundamental shift in how INGOs and donors perceive localisation - not as an aspirational goal but as the future of humanitarian response. The experience in Ukraine highlights that localisation efforts must go beyond rhetoric and be operationalised through genuine, long-term commitments to equitable partnerships. INGOs must move away from transactional

relationships and rigid compliance frameworks, embracing trust-based, capacity-strengthening approaches that empower local actors.

For localisation to be truly locally led and sustainable, INGOs and donors must rethink the role of intermediaries and design a balanced incentive strategy that fosters transformative partnerships. This means shifting power, resources, and decision-making to those best placed to respond - local actors - ensuring a more just and effective humanitarian system.

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APPENDICES

Appendix 1: methodology

This study was carried out using a qualitative research method, combining **desk-based research** and **semi-structured interviews** targeting three stakeholder groups: the DEC Secretariat, DEC Members and Ukrainian NGOs. Desk-based research provided the necessary background and contextual information specific to the DEC, its members' humanitarian and localisation efforts in Ukraine. This informed the **design of semi-structured interviews**, whose responses, combined with the combined qualitative analysis of literature research, produced **targeted recommendations on localisation, due diligence passporting and trust-building practices**.

Data sources
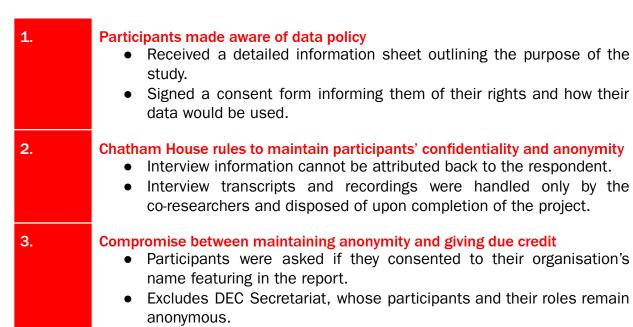
The literature review and semi-structured interviews were informed by a systematic review of grey literature, academic literature, and relevant global and national reports.

In total, 18 semi-structured interviews lasting 40-60 minutes were conducted. A selection of DEC Secretariat staff were interviewed to provide a comprehensive view of the DEC's organisational structure, localisation commitments and bargaining power. The DEC members interviewed were known to have localised predominantly through partnerships in Ukraine, and were involved in due diligence simplification. Lastly, the sample of Ukrainian organisations interviewed included national CSO networks and DEC members' local partners (Appendix 1).

Key themes across the interviews included: opportunities for localisation in Ukraine, equitable partnership-building, trust, due diligence, and collective action (Appendix 2).

Ethical considerations and confidentiality

This research dealt with sensitive topics such as conflict, displacement and challenges to humanitarian aid. Two of the co-researchers, being Ukrainian and having worked in Ukraine's humanitarian sector, provided essential cultural insights.

1.	**Participants made aware of data policy** ● Received a detailed information sheet outlining the purpose of the study. ● Signed a consent form informing them of their rights and how their data would be used.
2.	**Chatham House rules to maintain participants' confidentiality and anonymity** ● Interview information cannot be attributed back to the respondent. ● Interview transcripts and recordings were handled only by the co-researchers and disposed of upon completion of the project.
3.	**Compromise between maintaining anonymity and giving due credit** ● Participants were asked if they consented to their organisation's name featuring in the report. ● Excludes DEC Secretariat, whose participants and their roles remain anonymous.

Limitations

1.	**Small sample of DEC members interviewed** ● Intentionality: interviews investigated the best practices of localisation from leading member charities in the matter. ● A comprehensive overview of DEC members' localisation responses in Ukraine was achieved through the analysis of internal reports.
2.	**Transferability of findings** ● The unique features of DEC's Ukraine appeal and context are recognised. ● Desk-based research, literature review, and the DEC Secretariat's interview questions were not limited to the Ukrainian context.
3.	**Positionality** ● Desk-based research engaged with a diverse range of literary sources. ● Semi-structured interviews used open-ended questions to allow the interviewees to guide the discussion.

Appendix 2: Interview participants

DEC secretariat	DEC members	Ukrainian NGOs
DEC secretariat 1	DEC member 1	Ukrainian NGO 1
DEC secretariat 2	DEC member 2	Ukrainian NGO 2
DEC secretariat 3	DEC member 3	Ukrainian NGO 3
DEC secretariat 4	DEC member 4	Ukrainian NGO 4
DEC secretariat 5		Ukrainian NGO 5
		Ukrainian NGO 6
		Ukrainian NGO 7
		Ukrainian NGO 8
		Ukrainian NGO 9

Appendix 3: Interview question themes

DEC secretariat	DEC members	Ukrainian organisations
DEC's approach to localisation ● Role in shaping localisation ● Commitments ● Timeline	**Organisation's approach to localisation** ● General and in Ukraine ● Evolution of commitments ● Opportunities and challenges for localisation in Ukraine	**Organisation's experience of localisation efforts in Ukraine** ● Opportunities and challenges for localisation in Ukraine
Opportunities and challenges for localisation in Ukraine	**Trust and collaboration with Ukrainian partners** ● Partnerships approach ● Importance of trust	**Trust and collaboration** ● Best practices ● Partnership frameworks ● INGOs and donors
Trust-building in partnerships ● DEC Secretariat-DEC members ● DEC members-Ukrainian organisations ● DEC Secretariat-Ukrainian organisations	**Administrative processes and due diligence** ● Selecting partners ● Approach to due diligence passporting ● Barriers to simplification	**Administrative processes and due diligence** ● Importance of due diligence passporting ● Opportunities ● Barriers to adoption
Administrative processes and due diligence ● Due diligence passporting ● Opportunities and challenges	**Relationship with the DEC and DEC members** ● Feedback to the DEC ● Collaboration with DEC members	**Successful practices from other contexts** ● Best practices ● Feedback to DEC/INGOs
Future ● Upcoming changes ● Best practices from other contexts/appeals	**Future** ● Exit strategy ● Best practices from other contexts/appeals	**Future** ● Upcoming initiatives ● Next steps in Ukraine

Appendix 4: International localisation commitments

International localisation commitments			
	Charter for Change	**Grand Bargain**	**Pledge for Change**
Date	2015	2016	2022
Signatories	38 INGOs 640 N/LAs	68 total	13 total
Instigators	INGOs	UN agencies, donors governments, INGOs, ICRC	INGOs
Information	**Localised funding** **Capacity strengthening** **INGOs' advocacy**	**Funding reforms** **Grand Bargain 2.0:** political changes within humanitarianism	**Equitable partnerships** **Cost sharing** **Advocacy**

(Charter for Change, 2024; IASC, 2016; Pledge for Change, 2022)

Appendix 5: Principles of equitable partnerships

Transformative partnerships and empowering local voices		
Components	**Information**	
Due diligence and compliance	Donors	Collaboration, standardisation criteria, flexibility, transparency
	Intermediaries	Collaboration and flexibility, due diligence score a snapshot in time: prompts the joint design of a capacity-strengthening strategy
Risk-sharing	Donors	Support for capacity strengthening
	Intermediaries	Joint responsibility and mutual accountability, long-term partnerships
Funding quality	Donors & intermediaries	Direct funding, pooled funding, enforcing Charter for Change and Grand Bargain targets, ICR sharing
Organisational and capacity-strengthening	Donors	Review 'outputs' to include capacity-strengthening
	Intermediaries	Tailored to expressed needs, respect for local expertise, joint long-term strategy, closing feedback loop
Transparency	Donors and intermediaries	Clear communication at all stages, joint phasing out and exit strategy, official localisation strategies
Advocacy	Intermediaries	Platform to lobby change, due credit in storytelling
Locally-led decision-making	Donors	Challenging intermediaries on localisation and partnership efforts
	Intermediaries	Partners' access to leadership and coordination meetings

Humanitarian Advisory Group's (2021) recommendations regarding the role of intermediaries in locally-led humanitarian action, the IASC's (2007) 'Principles of Partnership', the Charter for Change (2015), Grand Bargain (2016), the Pledge for Change (2022), NEAR Network Principles (2018), the Core Humanitarian Standard (2024).

Appendix 6: DEC members' commitments to localisation

DEC Member Agency	Charter for Change	Grand Bargain	Pledge for Change	DEC-funded: Ukraine
Action Against Hunger				Yes
ActionAid	X	X		Yes
HelpAge International	X			Yes
British Red Cross		X		Yes
CAFOD	X	X		Yes
CARE International	X	X	X	Yes
Christain Aid	X	X	X	Yes
Concern Worldwide				Yes
International Rescue Committee		X	X	Yes
Islamic Relief	X	X		No
Oxfam	X	X	X	Yes
Plan International			X	Yes
Save the Children		X	X	Yes
Tearfund	X			No
World Vision		X		Yes

Appendix 7: DEC members in Ukraine

DEC Members in Ukraine: Delivery Approaches		
Delivery Approach	Phase 1	Phase 2b
Direct implementation	5	7
National affiliate	0	1
INGO partner(s)	4	2
National NGO partner(s)	9	6
Local NGO partner(s)	5	5
Other	0	2

Information sources: Narrative Reports for Ukraine Phase 1 and Phase 2b.
- Members Phase 1: Action Against Hunger, ActionAid, Age International, British Red Cross, CAFOD, CARE International, Christian Aid, Concern Worldwide, International Rescue Committee, Oxfam, Plan International, Save the Children, World Vision
- Members Phase 2b: Action Against Hunger, ActionAid, Age International, British Red Cross, CAFOD, CARE International, Christian Aid, Concern Worldwide, International Rescue Committee, Oxfam, Plan International, Save the Children

Data not available: World Vision Phase 2b - Ukraine

DEC MEMBER CHARITIES

ACTION AGAINST HUNGER

actionaid

age International

BritishRedCross

CAFOD
Catholic Agency for
Overseas Development

care

christian aid

CONCERN worldwide

RESCUE

ISLAMIC RELIEF

OXFAM

PLAN INTERNATIONAL

Save the Children

tearfund

World Vision

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