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Localisation Evaluation Final Report

Action Against Hunger Network

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The Humanitarian Impact Institute would like to thank the staff at Action Against Hunger Network and partners for the professional way in which they engaged with, and supported, this evaluation.

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Acronyms

AAH	Action Against Hunger
AAP	Accountability to Affected Populations
AF	Analytical Framework
AP	Affected Populations
BAID	Bukovinian Agency for Initiatives and Development
BRCT	Biroul Regional Pentru Cooperate Transfrontaliera
CA	Capacity Assessment
CCD	Collaborative Cash Delivery Network
CFM	Common Feedback Mechanism
CHS	Core Humanitarian Standard
CO	Country Office
CVA	Cash and Voucher Assistance
DEC	Disaster Emergency Committee
ET	Evaluation Team
FCRM	Feedback, Complaints and Response Mechanism
FGD	Focus Group Discussion
FHF	Fixed Health Facilities
HII	Humanitarian Impact Institute
IDPs	Internally Displaced Persons
IEC	Information, Education and Communication
INGO	International Non-Governmental Organisation
ISP3	International, Strategic Plan 3
KII	Key Informant Interview
L/N	Local and National
LoE	Lines of Enquiry
LPP	Local Partnership Policy
MEAL	Monitoring, Evaluation, Accountability and Learning
MHPSS	Mental Health and Psychological Support
MoH	Ministry of Health
MPCA	Multi-Purpose Cash Assistance
NGO	Non-Governmental Organisation
PDM	Post Distribution Monitoring
PFA	Psychological First Aid
RSE	Refugee Support Europe
RT	Review Team
UEP	Ukrainian Education Platform
UHA	Ukrainian Humanitarian Appeal
UNHCR	United Nations High Commissioner for Refugees
UTCB	Technical University of Civil Engineering of Bucharest
WASH	Water, Sanitation and Hygiene



Executive Summary

Action Against Hunger (AAH) conducted its Disasters Emergency Committee (DEC)-funded humanitarian response across Ukraine, Romania, Poland, and Moldova, starting in March 2022. This complex, multi-country programme focused on cash and voucher assistance, mental health and psychosocial support (MHPSS), food distribution, and hygiene kits for internally displaced persons (IDPs), refugees, and host communities. The programme relied heavily on local and national (L/N) actors, many of whom had no prior humanitarian experience.

Methodology

The evaluation used a qualitative, triangulated approach, incorporating a review of project documents, such as reports, work plans, and statistical results. The evaluators conducted Key Informant Interviews (KIs) with Action Against Hunger staff and L/N partners, Focus Group Discussions (FGDs) with affected populations, and validation workshops. Data collection spanned all four countries, although FGDs in Poland and Moldova were limited due to logistical challenges.

Key Findings

The evaluation, framed by the nine Core Humanitarian Standard (CHS) commitments, revealed both strengths and challenges in Action Against Hunger's localisation approach:

Localisation and Partnerships: Action Against Hunger's strategy of working with L/N actors was appropriate, given that this was the organization's first programme in the region. However, the application of localisation principles varied significantly across the four countries, often due to country office (CO) staff being unaware or unaligned with Action Against Hunger's localisation ambitions and goals. In

Romania, the training of partners, undertaken through external facilitators, was particularly effective, highlighting the benefits of its low-demand capacity-strengthening approach.

Hence, Action Against Hunger's efforts to build partner capacities were significant. The advantage was that individuals gained or improved their knowledge. The disadvantage was that the organisational capacity was less effectively strengthened because the efforts were overly reliant on personnel training and mentoring. The risk was that the capacities gained would be lost when trained staff left the organisation. Gaps in monitoring, accounting, and sector-specific knowledge (e.g., in cash assistance, WASH, and mental health) were addressed, but risked further gaps if staff rotated or left.

Interviewed respondents did not mention any issues regarding the timeliness of the assistance. In terms of the overall assistance, it generally seemed efficient, delivered on time and on budget. Delays were noted in the programme, particularly at the outset, due to unfamiliarity with the region and recruitment challenges. Additionally, there was no clear mechanism for partners to adapt their project activities to the changing realities on the ground, nor were they systematically included in coordination platforms, limiting their input into the broader humanitarian response.

Action Against Hunger's efforts to engage with communities were generally well-received, with culturally appropriate complaint and feedback mechanisms (CFM) in place. If tracking and reporting activities were in place in through systematically strengthening its country offices, Action Against Hunger could have more consistently documented the CFM accountability practices towards affected populations to meet the accountability to affected people (AAP) criteria.



Action Against Hunger implemented post-project workshops and learning initiatives for shared and peer learning. However, the programme lacked a dedicated Monitoring, Evaluation, Accountability, and Learning (MEAL) staff member from the beginning of the programme and lacked systematic MEAL documentation. This impeded the organisation's ability to track lessons learned and to integrate them into future responses.

Towards the end of the programme, Action Against Hunger made ad-hoc efforts in country offices to help partners continue working beyond the programme's lifespan, especially in Romania. However, these efforts were not supported with explicit transition or exit strategies, raising concerns about long-term sustainability in a volatile context.

Recommendations

The findings of this evaluation lead to the following recommendations:

1. To enhance the Action Against Hunger network's humanitarian response capability, the Localisation Working Group should lead the development of a range of templates and guides for delivering localised actions for all HQs. These can then be tailored to specific responses when they occur.
2. The Action Against Hunger network should increase all staff knowledge of, and commitment to, the Core Humanitarian Standard (of which Action Against Hunger is a signatory) and the Action Against Hunger network's localisation policy. The aim of this is to reflect those commitments and principles more fully into Action Against Hunger's response operations.
3. The Action Against Hunger network should lead a maturing of its understanding and approach to localised programming by (for example):
 - a. Setting (and then training all staff on) a clear vision and strategy for localisation that is aligned to Action Against Hunger's commitments in the CHS.
 - b. Establishing localisation capability in Action Against Hunger responses, including having the right people (seniority, influence/authority, orientation to localisation and knowledge); and creating a roadmap to deliver the corporate process changes required to enable localised responses.
 - c. Training all staff on how to implement localised responses with a focus on how to shift power and shift decision making to local/national partners; ensuring partnerships are based on the unique needs and ambitions of each partner; moving away from capacity building and towards a two-way capacity exchange; and supporting partners with the ambition and capacity to participate in humanitarian decision-making fora.
4. Action Against Hunger HQs and country teams should ensure that all data at all stages of the project cycle is consistently disaggregated into gender, age group, location and disability statistics at a minimum. This will help ensure that decisions are evidenced by reliable and accurate MEAL statistics and continue to enable accountable and inclusive programming.





5. The Action Against Hunger network should commission an independent third-party review to identify the extent to which Action Against Hunger's operational programmes are inclusive (e.g., gender, age, disability, minority) and any opportunities for further advancing inclusion in these programmes and the broader Action Against Hunger network.
6. Even in a rapid-onset crisis with high levels of staff turnover, Action Against Hunger HQ's should create a method for ensuring adequate project management records are maintained in a document management system that allows file retrievability.
7. Action Against Hunger's learning, accountability and programme management processes in the Ukraine Response needs to be more effectively gathering information from local/national partners and affected populations and subsequently used to make faster and more flexible programme adaptations. This learning and the corresponding adaptations should be appropriately recorded to demonstrate the learning cycle.



Introduction

Project Overview

As a Disasters Emergency Committee (DEC) member organisation, Action Against Hunger UK (AAH UK) has received financial support through the DEC's Ukraine Humanitarian Appeal. Action Against Hunger UK is part of the larger Action Against Hunger Network, which used the DEC contribution for operations that took place in Ukraine, Moldova, Romania and Poland. Activities began in March 2022 and will come to an end in early 2025. After the initial stage, Action Against Hunger implemented activities mainly through local/national (L/N) actors, most of which did not have prior humanitarian experience.

This response focused on cash and voucher-based interventions (CVA), mental health and psychosocial support, as well as on the distribution of food items and hygiene kits. The interventions targeted refugees, IDPs and host communities.

Context

Action Against Hunger implemented its DEC response in four challenging country contexts. In **Ukraine**, the conflict caused widespread destruction of infrastructure, displaced millions of people, and sparked a humanitarian crisis. The economic impact was severe, with businesses destroyed and the agricultural sector facing unprecedented challenges. The war also had a significant impact on Ukraine's energy supply, with frequent power outages and disruptions to heating and water services. The conflict led to a sharp decline in living standards for many Ukrainians.

In **Poland**, the influx of over two million Ukrainian refugees¹ strained public services and infrastructure. This humanitarian crisis

came at a time of economic challenges, such as high inflation rates and supply chain disruptions, though the country has also benefitted from increased trade and industrial activity. Poland's role as a NATO member bordering Ukraine has compelled it to significantly bolster its military presence to address heightened security concerns.

Romania also experienced a significant influx of Ukrainian refugees, impacting its social services. The country's Black Sea coastline heightened its focus on maritime security due to the war's destabilising effects on the region.

As a small and relatively poor country, **Moldova**² faced a disproportionate burden from the refugee crisis. Its non-NATO status and proximity to Ukraine have exposed it to significant security risks. Economically, Moldova suffered from increased energy costs and trade disruptions.

In all countries, Action Against Hunger initiated its response at the very onset of the emergency. This was a period marked by urgency and rapidly evolving needs. The situation demanded quick action to address the immediate needs of the affected populations. The staff who were involved at the onset of the response faced formidable challenges when responding to this sudden-onset crisis in these difficult operational environments.

In these environments, it was hard to identify and partner with local actors. The partners' unfamiliarity with humanitarian work added another layer of complexity to the collaboration. The context was notably different from other emergency responses, necessitating swift adaptation to the unique sociopolitical and logistical landscape of Ukraine.

¹ M. Leduc and K. Piasecka. "In Poland, Romania and Moldova, citizens rally to welcome war refugees from Ukraine." *Equal Times*. 2022. <<https://www.equaltimes.org/in-poland-romania-and-moldova-citizens-rally-to-welcome-war-refugees-from-ukraine>>. Accessed: 10 July 2024

² J. Groza. "One year on: The impact of Russia's war in Ukraine on Moldova." *The Foreign Policy Centre*. 2023. <<https://fpc.org.uk/one-year-on-the-impact-of-russias-war-in-ukraine-on-moldova/>>. Accessed: 05 July 2024.



For instance, in Ukraine, the rapid displacement of millions of people created an immediate need for humanitarian assistance in various forms, including shelter, food and medical care. Action Against Hunger had to quickly identify and collaborate with local partners that had no prior experience in humanitarian operations. These partners included local NGOs, community groups and even municipal authorities, all of whom were suddenly thrust into roles requiring immediate action and coordination.

Additionally, the conflict environment posed significant security challenges, with areas of active combat and frequent shelling making access to affected populations difficult and dangerous. Action Against Hunger had to navigate these risks while ensuring that aid reached those in need. The logistical hurdles were also substantial, with damaged infrastructure and supply chain disruptions complicating the delivery of essential goods and services.

The sociopolitical dynamics in Ukraine, with varying levels of governance and authority across different regions, further complicated coordination efforts. Action Against Hunger had to work with local authorities in some areas, while in others they dealt with community leaders or ad hoc volunteer groups. This diverse and fragmented landscape required Action Against Hunger to be highly flexible and adaptive in its approach.

In summary, Action Against Hunger's Ukraine response was shaped by the need to quickly mobilise resources and establish partnerships in a highly volatile and unfamiliar context. The combination of an urgent humanitarian crisis, inexperienced local partners, security risks, logistical challenges and complex sociopolitical dynamics created a uniquely challenging environment for Action Against Hunger's localisation efforts.

Action Against Hunger's Approach to Localisation

Even in contexts where Action Against Hunger has no pre-existing partnerships with organisations that have prior humanitarian experience, Action Against Hunger is committed to localisation. This commitment is articulated in its International Strategic Plan 3 (ISP3) 2020–2025, which sets network-wide objectives to “**Enhance** leadership of local responders to increase response capacity”, “**Scale up** our efforts to empower individuals, communities and local partners for greater resilience” and “**Convene and facilitate**, employing a rights-based approach, ensuring that affected populations have unrestricted access to humanitarian assistance”.

In addition to the commitments in ISP3, the Action Against Hunger Network is committed to upholding the Core Humanitarian Standard (CHS), which is the

primary analytical framework for this evaluation. The 2014 edition of the CHS is also a benchmark used by DEC and Action Against Hunger to define what quality and accountability mean in the context of humanitarian actions.³ This standard includes Commitment 3, the “Quality Criterion”, which includes the commitment that a “humanitarian response strengthens local capacities”. Further, the CHS commits those who have signed up to it, and who work in partnership, to “explain their commitment to the CHS, seek understanding of how their partners approach the Nine Commitments and do whatever they can to work with them to implement the CHS commitments.”

Action Against Hunger's Local Partnership Policy defines what it understands by local partnerships. This policy sets out a

³ The report and analysis used the previous CHS criteria (rather than the new version of 2024) as the evaluation had

started before the release of the CHS 2024 version, and the TOR was designed in line with the previous version.



commitment to partnering with L/N actors wherever possible; to acknowledging, respecting and strengthening the capacity, leadership and systems at a L/N level while learning from L/N actors; and to ensuring its work always adds value and complements that of L/N actors. However, this policy document was not in place for the whole of the Ukraine response.

The Action Against Hunger Network's Local Partnership Policy defines local partnership as:

A relationship between Action Against Hunger and one or more local and/or national (L/N) actors that work together to achieve a defined and shared goal, which contributes to the L/N actors' work. This relationship may be short term and operational, or long term and strategic. Such a relationship is based on shared interests and complementarity, is constructive and dynamic in nature and is mutually beneficial – for our partners, for Action Against Hunger and, most importantly, for the people and communities we serve.

The Action Against Hunger Network is also committed to the DEC's key priorities for promoting localisation within the context of the Ukraine response, defined in the January 2023 publication titled, *Options for Supporting and Strengthening Local Humanitarian Action in Ukraine: A Scoping Exercise Report*. Priorities include funding and financial management; capacity strengthening and organisational development; equitable partnerships; and coordination and collaboration.

The Action Against Hunger Network has been implementing localisation from the very beginning of, and at all stages, all three phases of its DEC Ukraine Humanitarian Appeal in Moldova, Poland, Romania and Ukraine, including:

- Phase 1: March to August 2022,
- Phase 2a: September 2022 to August 2023,
- Phase 2b: September 2023 to February 2025.

The DEC-funded part of Action Against Hunger's Ukraine Response to the crisis in Ukraine and neighbouring countries, including Poland, Romania, and Moldova, was a multi-phased, multi-sectoral effort aimed at addressing urgent needs and supporting recovery. The first phase (Phase 1) focused on WASH (Water, Sanitation, and Hygiene), MHPSS (Mental Health and Psychosocial Support), MPCA (Multi-Purpose Cash Assistance), FSL (Food Security and Livelihoods), and health, with a budget of £4,239,111. Subsequent funding for phases Phase2a, Pipeline and Phase2b extended these efforts, emphasizing MPCA, MHPSS, food security, and health.

During Phase 1, the project had an expenditure of £3,741,582, with £848,703 (22%) allocated to partners. In Phase 2a, Action Against Hunger reported total spending of £5,920,427, of which £3,983,308 (67.3%) was directed through partners. The project was still ongoing for Phase2b during this final evaluation, therefore the final expenditure figures could not be confirmed.

The projects were implemented across multiple countries, with specific managing bases in Bucharest, Rzeszow, Warsaw, Chernivtsi, Dnipro, Kharkiv, Mykolaiv, Chisinau and Odessa. Romania and Poland received focused attention in phases 2a and 2b, implementing MPCA and MHPSS programmes. Ukraine's support spanned broader sectors, including food, health, nutrition, and MPCA. Moldova programme implemented e-voucher, MPCA, food assistance and in-kind distribution, alongside training packages for L/N actors. The project had 24 partners in four country offices during the Phase 1, which then decreased to 21 partners during Phase 2a and 2b.



Action Against Hunger's Partnership Modalities

According to the latest iteration of Action Against Hunger's Local Partnership Policy, which was approved in July 2023, Action Against Hunger's partnership models are as follows:

Strategic Partnership

Strategic partnerships are built on a shared vision and a joint theory of change, extending beyond the confines of a single project or programme. In a strategic partnership, both Action Against Hunger and the L/N actor actively contribute to each other's strategic development. The relationship is characterized by mutual support, with both parties inviting one another to strategic review meetings and assisting in institutional strengthening. Funding within this model may be either restricted or non-restricted, and even if funding is temporarily interrupted, the relationship is planned to remain intact.

Operational Partnership

Operational partnerships are designed for short-term, project-specific collaborations. These partnerships allow Action Against Hunger to join forces with L/N actors who possess specialized skills or knowledge that complement Action Against Hunger's

expertise. While these partnerships can be repeated with the same partner for different projects, there is no intent to form a long-term strategic relationship. Funding for operational partnerships is typically restricted, which may preclude the development of a strategic partnership.

Transactional Partnership

Transactional partnerships are service-based collaborations where Action Against Hunger contracts an L/N actor to deliver specific services. These partnerships are typically short-term and focused on fulfilling particular tasks or requirements. In this model, the L/N actor is paid to provide a defined service, such as conducting surveys, delivering training sessions, or providing logistical support. Transactional partnerships are essential for projects that require precise, specialized inputs that Action Against Hunger cannot provide internally. For example, Action Against Hunger might subcontract a local organisation to conduct community surveys, utilizing local enumerators who speak the dialect and understand the cultural context, thereby ensuring accurate and reliable data collection.

Nature and Objectives of this Evaluation

As part of its funding agreement, Action Against Hunger was required to complete an externally-led evaluation of the Ukraine response but had a choice of which aspects of the response the evaluation would focus on. Action Against Hunger chose to commission an evaluation with a particular focus on localisation because of its desire to strengthen its ability to deliver localised humanitarian responses in the future, as the organisation is committed to shifting the power to local and national actors, as well as to putting people and communities at the centre of programming.

This evaluation focused on phases 2a and 2b and it has been carried out between January

and September 2024. It looks at the DEC-funded part of Action Against Hunger's Ukraine Response through the cross-cutting lens of localisation, assessing the strengths and weaknesses of local partnerships delivering humanitarian assistance in Moldova, Poland, Romania and Ukraine, as well the overall extent to which localisation enhanced the ability of Action Against Hunger to apply the CHS.

This was a learning-focused formative evaluation designed to produce network-wide learning from the Ukraine response on how localisation can be realised in emergency humanitarian settings to enhance a response's impact. The



evaluation findings are structured on the basis of the nine Commitments of the CHS.

The first objective of this evaluation was to assess the extent to which localisation has enabled Action Against Hunger to apply the CHS within its Ukraine response. The CHS is a benchmark used by the humanitarian sector, including both the DEC and Action Against Hunger UKI to define what quality and accountability towards affected people means in the context of humanitarian action. Therefore, it served as the standard by which the evaluation team (ET) assessed the intervention. Each of the nine CHS commitments was used as a criterion to structure both data-gathering and analysis.

The second objective of this evaluation was to determine the strengths and weaknesses of Action Against Hunger's partnerships with L/N actors formed to utilise the DEC-funded part of Action Against Hunger's Ukraine Response funding. Across the four countries, the Action Against Hunger Network has developed formal and sustained partnerships with a wide variety of local organisations, including local non-governmental organisations, national government ministries, local government and community-based organisations. This evaluation focused on insights into the strengths, weaknesses and lessons learned from these partnerships in Ukraine and neighbouring countries to provide input for more general and network-wide learning about the practice of localisation.

Methodology

Analytical Framework and Research Methods

The nine CHS Commitments provided the Analytical Framework for this formative evaluation. We used the CHS commitments to formulate Evaluation Questions (EQs) and concomitant Lines of Enquiry (LoE) that disaggregated into more specific questions. In addition, we included a small selection of questions on localisation.

The evaluation used a qualitative, triangulated approach with both primary and secondary data sources from all four countries of the DEC-funded part of Action Against Hunger's Ukraine Response (Moldova, Poland, Romania and Ukraine). The remainder of this section outlines the five ways in which we gathered our data.

Document Review

There was a desk review of documents related to the humanitarian response, specifically focused on the partner-led approach. Those documents included the reporting from Phase 2a and 2b; localisation-related documents; and the partners mapping, classified as per the Action Against Hunger partnership types. This desk review was ongoing at all stages of the evaluation.

KIIs with Local/National Actors

In total, 32 L/N actors and the DEC secretariat were interviewed to learn about the strengths and weaknesses of the Action Against Hunger approach to localisation in the Ukraine response. We interviewed all available partner organisations located in Ukraine, Poland, Romania and Moldova, segmenting partners according to the Action Against Hunger partnership types and types of organisations. This approach helped the ET to understand the multifaceted relationships and varied complexities inherent in the partnerships. It also aimed to give an equitable voice to all involved parties. As per the Steering Committee's decision, the partners from Phase 1 and those who received only minor support from Action Against Hunger (e.g., one training session or workshop) were removed. However additional interviews with Action Against Hunger Ukraine response partners who were not funded under the DEC funding (2 in Ukraine, 1 in Moldova) were conducted to better assess the evolution of Action Against Hunger's partnership approach and localisation practices.



KIIs with Action Against Hunger staff

The purpose of these KIIs was to gather perspectives from key Action Against Hunger staff involved in the DEC-funded part of Action Against Hunger's Ukraine Response. These provided the ET with an understanding of processes and adaptations to processes, choices made, as well as resources and staffing deployed to support a localised response, plus insights into what has worked or not, in relation to localisation and to each of the CHS commitments.

A total of 23 Action Against Hunger team members were interviewed, representing the four country offices. Additionally, we interviewed staff members from the Action Against Hunger UK office, which managed funding and relationship management with DEC. We also spoke with staff from the Action Against Hunger France office, which oversaw the responses in Ukraine, Poland, and Romania, as well as from the Action Against Hunger Spain office which directed the response in Moldova.

FGDs with Crisis-Affected People

The CHS commitments call for participation by the affected community in the assessments. To realise those commitments, and to adhere to Action Against Hunger's Local Partnership Policy and HII's own ethical research principles, the evaluation strived to ensure the engagement of crisis-affected people. Where possible (in Ukraine and Romania), FGDs were conducted with the affected people from a variety of backgrounds. Sampling prioritised the inclusion of members of the population that often experience barriers in receiving support, such as persons living with a disability and elderly people. However, this

was not always possible due to availability of participants. Preference was given to small group discussions, as this often helps to establish rapport and elicit complex information. FGDs were conducted in the preferred language of participants.

HII conducted the FGDs with the following groups:

- Dnipro, (Ukraine) Hot Meals Female Group (5 people in total, 1 person living with a disability)
- Dnipro (Ukraine), Hot Meals Male Group (5 people in total; 2 elderly people)
- Lasi (Romania), MHPSS Female Group (5 people in total)
- Lasi (Romania), MHPSS Male Group (6 people in total)

We were unable to conduct the FGDs in Poland and Moldova. In Moldova, there were no strategic partners from Action Against Hunger available. In Poland, the lists for the affected groups were only available for the MHPSS assistance, where the phone numbers were missing. The other lists were not available and the intervention was ended.

Validation Workshops

At the end of the data collection and analysis stages, we organised three validation workshops for Action Against Hunger staff and L/N actors.

The distribution was as follows:

- One joint workshop in Romania with Romania/Poland staff and Romania L/N partners
- Two workshops in Ukraine (one with staff and one with L/N partners).



Limitations

The CHS requires meaningful engagement with affected people in every step of the project cycle, including the final step of conducting the project evaluation.

Whilst the ET recognize the importance of meaningful engagement with affected people, we were not always able to arrange this. Specifically, we were unable to reach project participants in Poland, because the project had already been completed; and in Moldova, as many project participants were no longer present in the project catchment areas.

This means that the voices and opinions of affected populations for Poland are not represented in this report. The ET conducted FGDs with affected populations in Ukraine and Romania, and what they told us was so consistent that our findings are likely to be robust nonetheless.

Another limitation was that, towards the end of the process, local partners in Ukraine and

Poland chose not to participate in a validation workshop for Phase 2a and 2b partners. This means that the partners' opinions and reflections could not always be used to triangulate and finetune this evaluation's preliminary findings. Again, the messages conveyed by the partners we interviewed were largely consistent, which means that the findings are likely to be robust even without this final form of triangulation.

Finally, staff turnover and weaknesses in the organisational memory of Action Against Hunger and its partners limited our ability to collect the thoughts and opinions of staff members and to conduct decision-making process tracing. This amounted to an evaluative finding in relation to Action Against Hunger's record-keeping and document management, but also meant that we were sometimes unable to find the rationale for project decisions.

Interpretation of Evaluation Findings

Many of the findings we present in this evaluation appear critical, and we note that, in two distinct ways, this was in part the consequence of this evaluation's framing. First, this assessment was framed around the CHS Commitments, but the country offices had limited knowledge of these Commitments and had not designed their projects with these Commitments in mind. Second, the TOR for the evaluation required a review of its localisation efforts in particular. These efforts took place in a large and rapidly unfolding crisis in a region in which Action Against Hunger had had no

prior experience or pre-existing partnerships, and where local and national partners had not conducted humanitarian operations before. We may have come to very different findings if Action Against Hunger has trialled localisation in a context where it had a prior presence and long-standing knowledge of the local context and stakeholders; and where these stakeholders have had previous experience with humanitarian interventions. Ultimately, the evaluation answers the questions posed by the TOR using the evidence collected.



CHS Findings

CHS 1

Communities and people affected by crisis receive assistance appropriate to their needs.

Key Findings

When designing the programme, Action Against Hunger Country Offices (COs) used needs assessments from multilateral organisations such as UNOCHA and UNHCR, as well as state reports and data obtained from Action Against Hunger's L/N actors. These actors' datasets were obtained through community consultations and on-site assessments. This was appropriate as they had direct engagement with the local communities, and this was in line with the localisation principles.

Data were not consistently disaggregated over gender, age or disability at all stages of programme's implementation, which meant that there was inadequate specific information about the capacities or vulnerabilities of these groups and where or who the project could not or did not reach. This lack of detailed knowledge for each marginalized group caused gaps in understanding about which age or gender or group was not receiving assistance or who needed further assistance. According to the CO staff interviewed, including HQ staff responsible for reporting, this lack of clarity may reflect the uncertainty and limited knowledge of the project's targeted beneficiaries for assistance (i.e., the scope of the project). Without the detailed statistics collected for each group, it meant that the information was not systematically reported, or was under-reported in the documentation. Some activities that were disaggregated appeared in reports, such as the final narrative or the monthly reports, but there was no comprehensive documentation of the total reach – the full extent of the project's implementation and application. Additionally, lists for certain sensitive activities (for example MHPSS in Poland and Ukraine) were unavailable in the early stages. As a result, Action Against Hunger was sometimes unable to share the lists of activity participants to enable them to be selected for focus group discussions.

The DEC Output template does not require disaggregated statistics for reporting. This had an additional impact on Action Against Hunger's lack of data clarity, transparency and accuracy. Action Against Hunger could have benefited from more detailed statistics of the types of beneficiaries supported through a breakdown (disaggregation) of data to enable in-depth analysis and understanding of all groups and their status by gender, age, disability, location etc.

L/N partners occasionally identified discrepancies between their projects' design and evolving community needs.



EQ 1.1 To what extent did local partnerships enable the design and implementation of appropriate programmes based on an objective assessment of needs, preferences and risks, and thus ensure an understanding of the vulnerabilities and capacities of different groups?

Ukraine

After delays caused by HR constraints and logistical challenges, Action Against Hunger provided food support to internally displaced people housed in temporary shelters in Western Ukraine. At the beginning, non-Ukrainian, international Action Against Hunger technical staff made the food choices which were revised later to the local context. This was in part because of ongoing supply chain challenges, but also in part because the cooking sites had changed (and with that the available cooking methods), and because the affected groups had expressed dissatisfaction with the choices made and had reported their preferences to local partners, which had communicated these preferences with international Action Against Hunger staff.

"We probably spent a month agreeing on our first meal list. But we tried our best to make it nutritious, tasty and varied."

– KII, L/N Actor, Ukraine

Action Against Hunger's assessments and meeting notes with its partners confirm that the choice of food provision rather than cash assistance was deliberate, and that Action Against Hunger used food assistance to complement other interventions. The documentation further confirmed the monitoring reports and visits at all stages of the food distribution that includes warehouse monitoring, field visits and catering inspections.

Romania

The Phase 2b Project Proposal referred to the two most significant response gaps that were identified in the 2023 Romanian government's strategy report:⁴ basic needs

⁴ Government of Romania (2022). Governmental Emergency Ordinance no.100/2022.

and Mental Health and Psychosocial Support (MHPSS). Appropriately, Action Against Hunger aligned its project to help fill these gaps by implementing a Basic Needs and MHPSS programme during Phase 2b.

Seven out of the eight people that were interviewed from Action Against Hunger's four partner organisations in Romania confirmed that the assistance was delivered in appropriate locations and was appropriate to the needs of the affected communities and individuals.

Some staff at Action Against Hunger and its partners expressed uncertainty about Action Against Hunger's efforts reaching certain groups, such as elderly refugees. In all cases, the lack of consistently disaggregated data (starting from the early stages of the implementation) and data on Action Against Hunger's reach rendered the evaluation unable to verify the extent to which Action Against Hunger had reached priority groups and had overcome access challenges.

Poland

During Phase 2b, Action Against Hunger implemented MHPSS, Protection and Shelter activities that focused on Warsaw and Rzeszów. In Warsaw, Action Against Hunger shifted from emergency-based interventions to community-based support for refugees. This shift was based on communication with partners, which highlighted their preference for integrating refugees into Polish society to avoid dependency on external assistance. Action Against Hunger's partner, the Nagle Sami Foundation, provided psychological support through group and individual sessions, enhanced referral pathways, and remote psychological support. They also



supported Polish families hosting refugees to prevent secondary trauma. Care practices included psychosocial care for mothers, breastfeeding counselling and parenting skills sessions.

In Rzeszów during Phase 2a, Action Against Hunger found its partnership with one of the local organisations to be unviable. Action Against Hunger therefore started to directly implement emergency interventions including Psychological First Aid (PFA) and stabilisation for refugees at the Full Market accommodation centre. The staff and reports noted that the direct implementation offered a quicker solution as the partners' availability was limited. A mobile team supported other centres based on need, and longer-term MHPSS services were provided using trauma-informed protocols. Coordination mechanisms were established to support refugees transiting through these centres. Care practices in Rzeszów included counselling and support for caregivers and pregnant and lactating women in child-friendly spaces.

Action Against Hunger's own reports noted that they analysed feedback from affected population through the Feedback and Complaints Mechanism (FCM) and focus group discussions, as well as monthly analysis of the MPCA database to inform activity design.

Moldova

During Phase 2b, Action Against Hunger focused on improving the socioeconomic resilience of vulnerable households in Moldova, including refugees and local residents in Chişinău, Bălţi, and Ştefan Vodă. They transitioned from in-kind aid to unrestricted e-vouchers, which allowed the

affected groups to choose their own items and supported local businesses.

The project design was informed by the 2023 Multi-Sector Needs Assessment⁵ for Moldova. Partners appreciated the shift to e-vouchers and the programme's alignment with this 2023 assessment. However, three of the four interviewed partners expressed frustration with the top-down nature of the project design, feeling excluded from the initial planning stages. In two of these cases, the partners noted that Action Against Hunger had already received the funding and merely requested the partner to implement what Action Against Hunger had already agreed on internally. The partners noted that this was disempowering as well as counterproductive, as this lack of consideration of on-the-ground realities and expertise of field staff resulted in project components that did not fully align with the local context or beneficiary needs. Examples from these organisations included challenges with the distribution of food boxes and diapers. Regarding food boxes, partners noted that the delays caused challenges in reaching the people. The plan was to distribute two boxes consecutively, but by the time the boxes reached the affected groups, many people had already left, resulting in numerous families not receiving any boxes or receiving two boxes at once. The diapers were distributed in sizes that did not match the actual needs of the affected population. The kits also contained inconsistent numbers of toothbrushes. One partner mentioned that both the hygiene kits and food parcels were assembled without considering people's preferences. This made it difficult for the partner teams to justify why certain preferred items were missing from the kits.

⁵ UNHCR (2023) Multi-Sector Needs Assessment for Republic of Moldova



CHS 2

Communities and people affected by crisis have access to the humanitarian assistance they need at the right time.

Key Findings

The interviewed CO staff members and partners noted that Action Against Hunger's assistance was frequently delayed. The partners could not specify the extent of delays as there were multiple contracts/activities with Action Against Hunger. Delays were often the result of the absence of prior partnerships, Action Against Hunger's unfamiliarity with the region, and procurement and logistical requirements. Action Against Hunger France management office noted that there weren't any significant delays that had a contractual impact. The affected groups did not mention any challenges about the timeliness of the assistance, and no complaints were provided.

Staffing was the biggest challenge. Action Against Hunger faced difficulties finding staff for the positions advertised, due to limited availability of appropriately skilled people and a sector-wide surge in demand for them. Action Against Hunger also faced quick staff turnover. While the surge unit filled some of the gaps, consistency was a challenge and decision-making was often unclear and insufficiently well-documented. Partners noted that the fact that the already limited number of Action Against Hunger staff was regularly absent (due to being on leave or using their R&R allowance) added to the challenges, as country offices did not have a system to cover roles when staff were on leave. As a result, partners had to wait for their focal points to return before the required implementation-related decisions could be made.

EQ 2.1: Did local partnerships lead in the planning and implementation of programmes in a timely manner, making decisions and acting without delay? If yes, how was this achieved? If not, why were there delays, and what was the extent of the delays?

In [Ukraine](#), the main factors affecting timeliness included recruitment, logistics, procurement and money transfer processes. By the end of Phase 2a, Action Against Hunger had identified lessons learned⁶ from food procurement and had dealt with complaints from major suppliers such as METRO Wholesale company, who considered Action Against Hunger's procurement procedures to be unnecessarily complicated. Additionally, during the initial phase of the response,

Action Against Hunger faced constraints in human and material resources, which impacted implementation schedules. These issues were largely addressed in subsequent phases.

In [Poland](#), the key reason for delays was the lack of adequate Action Against Hunger staffing in the early stages of the implementation. In addition, Action Against Hunger had not had prior exposure to the significant bureaucratic challenges posed by

⁶ Action Against Hunger Phase 2a Final Narrative Report: Ukraine + Pipeline, FINAL. Section: Lessons Learned.



Poland's complex regulatory requirements and lengthy approval processes.

In [Romania](#), the frequent turnover of Action Against Hunger staff, as well as Action Against Hunger's R&R practices (due to a lack of a designated focal point when staff was on leave), lack of handover and a persistent problem of vacancies affected the response's timeliness. Legal and legislative changes in Romania added another layer of delays. These delays were partly caused by Action Against Hunger's unfamiliarity with Romania's regulatory environment, but this was exacerbated by frequent alterations in local laws and by Romania's governmental attitude towards the refugee centre, which created a sense of uncertainty. (In this context, Action Against Hunger coordinated with the Department for Emergency situations under the Ministry of Internal Affairs.) The Action Against Hunger team noted that they had to frequently rethink their implementation plans to ensure the response remained adaptable to the evolving legal and political landscape while

continuing to meet the urgent needs of the refugee population effectively.

Procurement timelines were also prolonged because of difficulties in finding reliable suppliers. Lastly, two L/N actors reported that more streamlined and consistent coordination with other humanitarian actors from the outset would have reduced delays.

In [Moldova](#), partners noted that the main reason for delays was related to Action Against Hunger's structure, which they felt was opaque, and that the impact of delays was severe. One partner noted that they often had to front costs and then apply for reimbursement from Action Against Hunger, and that Action Against Hunger's money transfers were sometimes up to 20-30 days later than what was originally agreed with Action Against Hunger. This posed severe cash-flow challenges and required partners to use their own funds or borrow from banks. Additionally, frequent staff changes within Action Against Hunger led to shifting project deadlines and to the need for partners to do urgent weekend work to meet the deadlines.





CHS 3

Communities and people affected by crisis are usually more prepared, resilient, less at-risk and not negatively affected as a result of humanitarian action.

Key Findings

The evaluation interpreted Action Against Hunger's contributions to resilience as efforts to bolster the operational capacity and resilience of L/N actors.

Within Action Against Hunger there was no unified knowledge and understanding of Action Against Hunger's localisation approach or of its Local Partnership Policy after it was approved in July 2023, and there was no concerted effort to implement this approach. While HQ staff were clear on the agenda to promote local leadership, CO staff (aside from in Romania) often lacked such clarity, or held contradictory views. In addition, CO staff often believed that localisation objectives stood in the way of, and were superseded by, the urgent need for delivery.

Within the COs, staff worked with the mind-set that the sudden-onset emergency nature of the programme meant that immediate aid should be prioritised over resilience-building strategies; and that applying the concept of resilience in this sudden-onset emergency context was challenging in the extreme. Action Against Hunger did not make a meaningful attempt to change this mind-set.

Resilience-strengthening efforts were country specific. Romania showcased a successful model that involved an external consulting agency that conducted systematic capacity assessments of and provided tailored support to L/N actors. This approach led to organisational learning without posing unreasonable time requirements on L/N actors. It presents an interesting example of how local organisational resilience can be strengthened.

Across the country offices, local partners recognised that Action Against Hunger's capacity-strengthening support had been of some benefit. However, despite evidence of multiple efforts, there was a lack of a coherent, systematic approach to institutional capacity development. Additionally, documentation of these efforts could have been enhanced to better evaluate what had succeeded and what had not.

Similarly, Action Against Hunger has made efforts to help some of its partners thrive beyond the lifespan of Action Against Hunger's programme, but these efforts were largely ad hoc and not underpinned by explicit transition or exit strategies. The results of Action Against Hunger's capacity strengthening and exit measures are uncertain in the volatile context of the overall Ukraine response and are likely to be dwarfed by the uncertain longer-term funding environment and opaque criteria for aid distribution.



EQ 3.1: To what extent did the response facilitate the development of local leadership, both within communities and local organisations and also in relationship to their capacity as first responders in the event of future crises?

Local leadership has been a cornerstone of the Action Against Hunger localisation strategy. The Local Partnership Policy⁷ of the Action Against Hunger Network stated that:

"Action Against Hunger's Local Partnership Policy commits us to partnering with local/national (L/N) actors wherever possible. Action Against Hunger is committed to acknowledging, respecting and strengthening the capacity, leadership and systems at the L/N level while learning from L/N actors and ensuring our work always adds value and complements that of L/N actors. We do this so that the needs of affected communities are more appropriately addressed and that L/N actors are better prepared for their role as humanitarian and development responders."

In the same document, Action Against Hunger emphasises the importance of local leadership:

"We strive to turn short-term collaborations into longer-term strategic partnerships where deemed beneficial for the L/N actor and promote local leadership as far as possible. We are committed to investing the necessary resources required to work in partnership."

Interviews with HQ personnel revealed that Action Against Hunger's localisation agenda was well-known at a conceptual level, and that local leadership and capacity development was seen as an integral part of this agenda. All CO proposals under the DEC, as well as all country reports, stated that partnerships aimed to strengthen the leadership capacity of L/N actors through (1) institutional capacity building, (2) technical capacity building, and (3) exit strategies and efforts for resilience beyond the project timeline.

While senior HQ-level Action Against Hunger staff noted that L/N actor capacity was a matter of priority, most CO staff members did not share this perspective. They were largely unaware of Action Against Hunger's localisation agenda or held contradictory views on the current leadership capabilities of L/N actors, and their potential leadership capabilities beyond the project period. CO staff had found the partner selection had been most challenging, because:

- There had not been an established tradition of humanitarian aid in any of the countries, and the humanitarian response capacity of L/N actors had been extremely low at the start of their partnerships with Action Against Hunger.
- Action Against Hunger's international staffs' experience and capacity in the implementation countries had been limited, and there had been no pre-existing local Action Against Hunger staff within any of the countries.
- The influx of numerous INGOs into the region, coupled with the scarcity of potential local partners, had created a sense of urgency to quickly identify and mobilise partners. Action Against Hunger staff noted that this identification and mobilisation process had been very challenging, also because of the wider sector's high demand for skilled humanitarian workers.

⁷ Action Against Hunger Local Leadership Policy. 2023.



At the onset of the response, Action Against Hunger had lacked the human resources and networks of partners to implement the localisation agenda. Action Against Hunger staff's workload and varying levels of capacity of Action Against Hunger's partners had added to the challenge across all COs, and particularly in Ukraine and Moldova.

As was the case for other INGO responses in Ukraine, Action Against Hunger experienced significant staff turnover, and failed to document and implement partnership strategies (until early 2024). In part, this was the result of Action Against Hunger COs not initially having a fully staffed partnership department until 2023. In part, it was because experience built in the course of project implementation remained undocumented and was often lost when Action Against Hunger staff left the programme. Key documentation that did exist sometimes got lost as well – such as was the case for partner capacity assessments and capacity development plans in Ukraine and Moldova.

Notwithstanding these various challenges, Action Against Hunger invested in partner strengthening in each of the COs. In Ukraine, for instance, Action Against Hunger reported that they supported skills strengthening in logistics, finances, MHPSS,

staff supervision and HR. In Poland, the CO reached 180 participants with training related to MHPSS and Protection. In Moldova, Action Against Hunger deployed a partner capacity assessment tool and then provided limited technical support – but we were unable to assess the results as poor documentation and high staff turnover in Moldova meant that neither documents nor interviews provided useful data.

The Romania CO has more systematically pursued partner capacity strengthening than the other COs. It did so by involving an external agency, Concordia. Consultants from Concordia worked with partners to conduct systematic capacity assessments, followed by tailored training provision that was based on the varying capacities and needs of each partner. This enabled staff to carry on with project implementation without becoming overwhelmed, while also ensuring that capacity strengthening investments were meaningful and appropriate. The Action Against Hunger Romania CO allocated adequate budget and resources for this part of their effort.

Notwithstanding Action Against Hunger's innovative and appropriate capacity strengthening design in Romania, the result of its investment is impacted by the uncertain longer-term funding environment.

EQ 3.2: Did Action Against Hunger and local partners plan a joint transition or exit strategy in the early stages of the humanitarian programme that would ensure longer-term positive effects and reduce the risk of dependency?

In some cases, no long-term exit strategy was needed as partnerships were transactional and interventions were designed to meet immediate but temporary needs. For example, this was the case when Action Against Hunger financed the time-bound distribution of hygiene kits, hot meals and food kits to mobile groups. Where this was relevant, Action Against Hunger aligned its temporary contributions with a country's Ministry of Health (MoH) policies, to avoid

creating a parallel health system. This is appropriate and facilitates an INGO's exit.

Even where Action Against Hunger did not have long-term ambitions, Action Against Hunger's withdrawal from regions, partners and activities was sometimes overly abrupt and did not provide partners the prior notice required to adapt. For example, a partner from Western Ukraine noted that:





“They [Action Against Hunger staff] came to our office and explained that the focus was shifting to the east and the office would close. We were sad, but we understood. Action Against Hunger helped us to survive through the worst time, anyway, so we were grateful.”

– KII L/N Actor, Ukraine

In the case of more strategic partnerships, CO staff in all countries mentioned the existence of exit initiatives, but their significance varied by country and partner. Efforts took the shape of recommendation letters, introductions to coordination groups, project handovers, final series of training sessions and informal discussions about next steps.

“We discussed potential plans for other projects but those did not materialise. We were waiting but never heard back from them [Action Against Hunger].”

– KII L/N Actor, Ukraine

We have not seen exit strategies for Moldova⁸ and Ukraine. In Romania and

Poland, Action Against Hunger’s Phase 2b proposals included an exit-strategy component; and in Romania, Action Against Hunger even extended the programme’s end date from February 2024 to April 2024 to ensure the completion of its exit strategies⁹.

Partners found Action Against Hunger’s exit efforts useful but feared that any effects would depend on a long-term interest among donors, which appeared to be declining.

“When they left, all the other organisations left, too. They all expected this to be a short-term conflict, and there are always catastrophes happening in the world that they had to redirect their focus on. But to be honest, by the time they left, there were very few AP left in Romania; many had already been successfully integrated. Our organisation started 12 years ago, so we did what we could to respond to the crisis, and, when Action Against Hunger left, our organisation remained standing.”

– KII, L/N Actor, Romania

⁸ The Moldova CO confirmed the existence of exit plans but was unable to share these plans with the ET.

⁹ Action Against Hunger Phase 2b Plan, Final Report: Romania.





CHS 4 & CHS 5

Communities and people affected by crisis know their rights and entitlements, have access to information and participate in decisions that affect them.

Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints.

Key Findings

In all COs, Action Against Hunger and its partners used various methods to communicate with their target communities. These included leaflets and other forms of Information, Education and Communication (IEC) material; face-to-face communication; and various channels that could be used for feedback and complaints. Action Against Hunger used local staff and volunteers to ensure that communication was culturally appropriate and took place in relevant languages.

The response did not systematically meet CHS requirements related to accountability to affected communities. It also did not utilise the feedback and complaints it received as part of its formal monitoring of the project implementation process and the way needs and contexts evolved. The ET saw evidence of feedback and complaints being used to tweak operations, but there was no mechanism to respond to issues that required more than minor adjustments.

However, the ET did see evidence of meaningful engagement with partners and relevant institutions, as well as with members of affected communities. Across the groups we interviewed, project participants felt well-informed, were aware of ways to engage with project staff, and felt that their stated opinions and preferences mattered.

Action Against Hunger and its partners did not have a mis- and disinformation policy. Action Against Hunger did not track what information spread amongst its target groups, either systematically or on a sample basis, even though there were occasional concerns about the accuracy of information provided by local actors, including rumours that discouraged people from using Action Against Hunger's hotline.

EQ 4.1: To what extent did local partnerships enable communication in languages, formats and media that were easily understood, respectful and culturally appropriate for different members of the community, especially vulnerable and marginalised groups?

How did local partners understand the languages, formats and media that were appropriate for the community?

Action Against Hunger and its local partners undertook several activities that aimed to ensure effective and culturally sensitive communication with target groups. Much of this information was conveyed to ensure that the affected people and other stakeholders received accurate and relevant information about their rights and entitlements, about



the roles and responsibilities of the project implementers, and about the projects' objectives. The information was often spread in the form of material such as leaflets and IEC material, which was designed to be clear and relevant to the community.

After overcoming initial communication barriers between Action Against Hunger staff and L/N partners, and the affected groups and L/N partners; Action Against Hunger managed to ensure that local staff and partners used local languages (Ukrainian, Moldovan or Romanian) to convey information. Regular direct engagement with stakeholders, including national and local authorities, as well as direct interaction with affected populations, also served to disseminate and gather information and to respond to community needs.

In the case of both written and direct communication with the affected groups, Action Against Hunger and its partners used Ukrainian staff and volunteers to ensure that the information provision was accessible and culturally appropriate. For instance, Ukrainian volunteers in Romania and Poland who understand the local context held in-person Ukrainian-language information sessions to address concerns, answer questions, and provide reassurance 'as fellow Ukrainians'. In addition, two-way communication mechanisms were established through various channels, such as WhatsApp, Viber, Telegram and dedicated hotlines, to enable affected populations to receive information *and* to communicate with the programme implementers. It is not clear how much communication traffic these channels facilitated, and the ET did not see evidence that communication received through these channels was systematically captured, responded to and learned from.

Nonetheless the ET saw evidence that affected groups believed that they had sufficient information and knew where to find additional information if needed. We

also found evidence of Action Against Hunger efforts to further improve the way the organisation informs and engages with target communities. One Ukrainian example is an initiative titled *Agents of Well-Being*, which pilots new forms of appropriate communication with affected populations. Action Against Hunger Ukraine staff explained that these agents are well-known and respected figures within the community. Their role is to inform the community about Action Against Hunger's partners' services and encourage community members to utilize these services. Action Against Hunger provides these agents with a small compensation for their work. Staff emphasized that this approach is particularly important for sensitive activities, such as MHPSS group sessions, where there may be hesitancy from the community to engage due to cultural norms.

However, Action Against Hunger's communication plans were not fully formalised and documented, and not all partners were aware of them. This resulted in an uneven implementation and effectiveness of these plans, and inconsistencies in the distribution and utilisation of IEC materials led to varying levels of information delivery across different groups. In all cases, communication prior to and during implementation was better than post-project communication, which had been part of the project plans but did not systematically happen.

Action Against Hunger and its partners did not have a mis- and disinformation policy. Action Against Hunger did not track what information spread amongst its target groups, either systematically or on a sample basis, even though there were occasional concerns. Two examples related to unsubstantiated rumours about local staff and volunteers withholding or even stealing in-kind aid; and the rumour that the Action Against Hunger hotline was a scam, which may have discouraged people from using this hotline.



EQ 4.2 & EQ 5.1: To what extent did the localisation approach enable diverse community members to shape programme decisions and provide feedback? Were they aware of complaint and feedback channels and did they use them effectively? Were complaints managed safely and fairly by local partnerships? If yes, how? If no, why not?

This CHS commitment requires a deliberate and persistent focus on ongoing two-way communication with affected communities and on the utilisation of the insights this creates.

To operationalise this focus, the CHS outlines a number of organisational responsibilities that must be fulfilled. These include:

1. **Ensuring participation and feedback mechanisms:** Establishing regular and inclusive feedback channels that are accessible to all community members, considering gender, age and diversity.
2. **Transparency and communication:** Providing clear and transparent information about how feedback will be used and the impact it will have on programme decisions.
3. **Community engagement in decision-making:** Actively involving community representatives in programme decisions to ensure their perspectives and needs are reflected.

The programme did not systematically meet these requirements. However, the ET did see evidence of meaningful engagement with partners and institutions, as well as with members of affected communities. As this engagement differed across the COs, we cover them in turn.

Ukraine

Action Against Hunger and L/N actors used a variety of mechanisms to be accountable to, and engage with, affected populations. Maintaining regular communication with partners helped Action Against Hunger to obtain information about the people supported, as well as about contextual changes and needs. Other useful mechanisms included an external hotline,

field visits, monitoring visits, the use of a self-reporting questionnaire and PDM surveys, as well as communication through social network channels.

The interviewed affected group members in Ukraine felt that it was easy to provide feedback, either positive or negative, and they were aware of a number of ways in which they could provide this. They also felt that their opinions were appreciated and mostly incorporated into the project activities. However, the reasons for not making proposed changes were not always communicated and left some people questioning the rationale.

All partners reported that they felt safe to provide critical feedback to Action Against Hunger and had a chance to do so, mostly as part of their regular (and in some cases daily) informal communication with Action Against Hunger staff. Partners appreciated Action Against Hunger local staff members' openness to active dialogue, and their willingness to search for solutions of minor problems together. However, feedback that required more significant changes in the project, or structural changes in the way Action Against Hunger operated, was not always followed up on. It was in those cases that partners felt a more formal engagement and two-way feedback format would have been helpful.

Poland and Romania

In Poland and Romania, Action Against Hunger relied on both an internal Feedback, Complaints and Response Mechanism (FCRM) and partners' own FCRMs. The two COs established joint FCRM guidelines. According to these guidelines, *"In addition to the AP, a complaint can be made by a supplier, contractor, local authority, a partner organisation or an individual with whom we work either directly or indirectly."* The available FCRM channels included a toll-free



helpline, a dedicated email address, WhatsApp/Telegram/Viber, Action Against Hunger Field Staff and L/N actor staff.

Limited documentation related to the actual use of Action Against Hunger's and its partners' FCMs suggests that these FCMs were not widely used by affected communities, but that the feedback that did arrive was dealt with within a week on average.

Partners in both countries noted that Action Against Hunger considered their feedback and that they felt safe while communicating with Action Against Hunger staff. They appreciated the option of WhatsApp and phone communication, which they found fast and effective. In Poland, two partners noted that the communication with Action Against Hunger staff was different to – and smoother than – communication with their other INGO partners.

Moldova

To gather feedback and address complaints from affected populations, Action Against Hunger conducted two PDM surveys in collaboration with the *Dignity Centre* in Chisinau. These showed that the affected populations were very satisfied with the assistance received. However, only aggregate results were available, and it is therefore not possible to assess the extent to which sections of (the marginalised) populations agreed with this.

Action Against Hunger also implemented its own FCRM system across the programme. This system was based on Action Against Hunger guidance, standards and procedures, and Action Against Hunger offered its partners FCRM-related training and technical assistance. These FCRM channels were used regularly (930 contact points between June to November 2023). Most contact points (73%) were made by non-project-participants who requested assistance. This is often the case for projects that do not engage the affected community when the eligibility criteria were developed, and that do not communicate the selection process sufficiently well, and indeed we did not see evidence of either having happened.

One obstacle to using the hotline appears to have been that the rumour had spread that the toll-free number was a scam, meant to extract money – suggesting people may not have called it because of that rumour. Again, the calls that were placed were mostly from non-project-participants, who called to request assistance.

Action Against Hunger partners found communication with Action Against Hunger to be 'hard work'. It often had to be escalated to Action Against Hunger management. This, in combination with the lack of regular Action Against Hunger-partner meetings and Action Against Hunger's high turnover of staff meant that partner feedback often remained unactioned.





CHS 6

Communities and people affected by crisis receive coordinated, complementary assistance

Key Finding

In each of the countries, Action Against Hunger made both programme **level and** organisational changes in the course of the programme's lifecycle. These changes were often made in response to changing contexts and new evidence, and they helped ensure that the response remained relevant.

Action Against Hunger participated in various coordination platforms (including but not limited to cluster system working groups), but Action Against Hunger did not systematically encourage the engagement of its partners in these platforms. Action Against Hunger did not systematically share the results of these coordination efforts with its partners either, although we did see some information provision in the context of MHPSS working groups. In most cases, Action Against Hunger partners were unaware of the existence of these platforms. This is a significant shortcoming. First, access to such platforms would have provided information that may have reduced the likelihood of avoidable gaps and duplication of efforts. Second, their absence in these platforms meant that their voices were not heard by the wider humanitarian sector, and that they were therefore unlikely to have meaningfully contributed to the shape of the humanitarian response to the Ukraine crisis.

EQ 6.1: Has the intervention responded to changes in the context and to new knowledge/evidence to remain relevant during its lifetime?

In each of the COs, Action Against Hunger made both programmatic and organisational changes in the course of the programme's lifecycle, several of which have already been covered. In Moldova, Phase 2b expanded operations into the Causeni region, upon the suggestion of the Moldovan Social Workers Office.

In Romania, Action Against Hunger moved its closure date from February to April 2024 as the CO, to complete the exit strategies for Action Against Hunger's partners.

In Ukraine, Action Against Hunger shifted its focus from IDPs within communities to IDPs residing in institutions, because of an assessment that revealed critical challenges faced by some of these institutions. These and a range of other changes were in response to changing contexts and new evidence and helped the programme to remain relevant during its lifetime.

One partner identified Action Against Hunger's lengthy procedures as the key problem. In reality, the procedures for processing partner feedback were not lengthy but absent or unclear. This is why minor changes were often quickly approved while more significant changes were not. Action Against Hunger demonstrated a few examples where modifications were done as a result of the partner requests. Action Against Hunger staff felt comfortable taking responsibility for approving these minor changes but did not know how to go about more demanding requests. One implication was that some partners declined to communicate new needs to, as they did not think they would be authorised. One partner in Ukraine, for instance, mentioned that they never communicated requests to change or add new locations, even after identifying emerging needs in those areas. Another



partner noted that they were hesitant to communicate any changes.

“In reality, it is mostly impossible to make changes to projects. This is true for all donors. It is very

rarely that you can change the subject, add a training, if it was not specified in the contract. We remained silent.”

– KII, L/N actor, Ukraine

EQ 6.2: Did Action Against Hunger ensure that partners were aware of relevant standards and engaged in coordination mechanisms? Did Action Against Hunger share necessary information with local partners, local coordination groups and other local relevant actors through appropriate communication channels? To what extent was there clear communication between Action Against Hunger and L/N actors?

Ideally, L/N actors are aware of and subscribe to the CHS Commitments. This was not the case. Action Against Hunger utilized online and face-to-face training and induction sessions to familiarize its partners with humanitarian principles, and Action Against Hunger’s messages and material were aligned with the spirit of some of the CHS Commitments. However, Action Against Hunger did not generally mention the CHS Commitments explicitly. The training and induction activities did not cover the full set of CHS Commitments and Action Against Hunger’s capacity assessments in COs did not include an assessment of a partner’s familiarity with these Commitments, or the alignment of its practices with these Commitments.

Ideally, L/N actors actively engage in coordination forums. In part, this is to be in the loop about the wider local and regional humanitarian response, so as to be able to avoid a duplication of efforts. In part, it is also because it is important that these actors meaningfully contribute to the design, implementation and monitoring of that wider response. Their voice should be heard by other actors, and their opinions and experience should influence choices made.

We saw anecdotal evidence of Action Against Hunger COs trying to encourage its partners to engage with such platforms. We do not know how strong and persistent these attempts have been, but did not see evidence that any such attempts have been

successful. We did see CO engagement with coordination bodies at various levels, but Action Against Hunger’s partners were not part of this engagement. Moreover, Action Against Hunger did not share the results of these coordination efforts with its partners, who were generally unaware of the existence of the various sectoral meetings and coordination efforts.

“We did not participate in those. We did the initial assessment and chose the community that was not receiving support from others at the time, so there was that element in our project with Action Against Hunger, I don’t recall organising any meetings with other stakeholders for this one.”

– KII, L/N partner, Ukraine

Except for partners in Romania, Action Against Hunger’s partners did not have information about the work of other stakeholders. Action Against Hunger noted that in Romania, there was only a national working group, and the local partner. Such information may have reduced the likelihood of avoidable gaps and duplication of efforts. In addition, their absence in these platforms meant that their voices were not heard by the wider humanitarian sector, and that they were therefore unlikely to have meaningfully contributed to the shape of the humanitarian response to the Ukraine crisis.



CHS 7

Communities and people affected by crisis can expect delivery of improved assistance as organisations learn from experience and reflection.

Key Findings

Action Against Hunger demonstrated a commitment to deliberate learning across its COs during various phases of the DEC response, evidenced by such activities as post-project workshops, webinars, lessons-learned reports and external assessments. Both Action Against Hunger and its L/N partners confirmed significant learning from these initiatives and expressed a commitment to continuous improvement. The request to focus this evaluation on an issue that Action Against Hunger hopes to invest in in the coming period further highlights Action Against Hunger's intent to enhance its practice on the basis of learning from previous experiences.

However, a systematic approach to learning was hindered by an insufficiently consistent presence of dedicated MEAL staff across COs, which led to a reliance on individual efforts and inconsistencies in capturing and sharing lessons. The urgent nature of emergency settings and pressure to deliver immediate assistance, further complicated systematic learning.

Additionally, challenges with knowledge management including documentation and recordkeeping meant that critical information often remained with individual staff rather than being systematically archived. This impeded the continuity of knowledge and the effective use of past lessons to inform future actions. It also meant that Action Against Hunger did not systematically capture key data such as the feedback and complaints it received with the aim of learning overall lessons.

EQ 7.1: To what extent did the Action Against Hunger and its local partners engage in deliberate learning and then share that learning and innovation with each other?

Action Against Hunger demonstrated a commitment to learning across its COs in various phases of the DEC response. In each country, the respondents confirmed that Action Against Hunger implemented specific learning activities, such as post-project workshops, webinars, meetings, project/M&E reports and lessons-learned activities. These initiatives facilitated continuous improvement, with both Action Against Hunger and its L/N partners confirming significant learning from the programme. The request for this external evaluation to focus on the particular theme of localisation underscores Action Against Hunger's dedication to learning and

evolving from its experiences, highlighting its desire to understand what worked, what didn't and how the organisation can improve.

However, a range of challenges and weaknesses meant that Action Against Hunger failed to establish a systematic approach to deliberate learning.

First, none of the COs had dedicated MEAL staff during Phase 1 and relied on MEAL support from outside of the countries of operation. In later stages, recruitment and visa problems continued to limit Action Against Hunger's in-country MEAL functions. The result was an insufficiently consistent



presence of dedicated MEAL staff across COS. Other staff members did not carry strong accountability for MEAL. It was often unclear who was responsible to record learning gathered at all stages of implementation. The lack of sufficient personnel to oversee and manage learning activities meant that much of the learning was reliant on individual efforts rather than institutional processes. This dependence on personal initiatives led to inconsistencies in the ways in which learning was captured and shared across staff and offices.

Second, significant weaknesses in relation to Action Against Hunger's recordkeeping and document management (which was covered above) also hampered the learning process. In many instances, essential documents and records were not systematically archived but remained with individual staff members. Rapid staff turnover aggravated the effects of Action Against Hunger's weak knowledge

management. This weakness was prevalent across all COs, and this made it difficult to retrieve and utilise past learning to inform future actions. One example is that the programme did not systematically capture the feedback and complaints it had received with the aim of learning overall lessons from this feedback.

Third, the conditions in sudden-onset emergency settings are not naturally conducive to the process of deliberate learning. The urgent nature of humanitarian crises often prioritises immediate response over reflective practices. High staff turnover, the pressure to deliver rapid assistance and the constantly changing conditions make it difficult to systematically document and analyse lessons learned. In such volatile environments, maintaining continuity in learning efforts is a formidable challenge, as the focus is predominantly on speed of delivery and crisis management.



CHS 8

Communities and people affected by crisis receive the assistance they require from competent and well-managed staff and volunteers.

Key Finding

Action Against Hunger facilitated the development of technical and management competencies among its partners, and many reported improvements in their skills and processes. The training provided by Action Against Hunger, including in the area of mental health sessions for the partners' staff, is likely to have contributed to professional growth of partner staff involved.

However, some of Action Against Hunger's efforts duplicated the efforts of other INGOs, and the efforts were too reliant on training as a capacity strengthening modality. One implication of this overreliance on training is that the durability of the gains in partner capacity depends on staff retention, as training tends to improve individual competencies more than organisational capacity elements such as policies, processes, organisational structure, systems and strategies.

Well-resourced, large-scale humanitarian responses in new regions typically lead to an international humanitarian sector offering (and sometimes demanding participation in) a range of capacity strengthening initiatives. Perhaps this explains why we did not see evidence that Action Against Hunger's partners used Action Against Hunger's indirect cost allowance to further bolster their own capacity. Instead, this percentage appears to have been used to merely cover unallocated organisations costs.

EQ 8.1: To what extent did Action Against Hunger enable local partners to develop and use the necessary personal, technical and management competencies to fulfil their role? Did Action Against Hunger's approach to supporting L/N actors' indirect costs enable the development of local institutional capacity?

Action Against Hunger UK's Local Partnership Policy states that "In every context we aim to [...] ensure that we are [...] strengthening local capacity". Initially, Action Against Hunger's efforts to do this could not be adequately resourced due to recruitment and other contextual challenges. Capacity-strengthening efforts therefore started relatively late.

"At the beginning, we were talking about capacity building. But who had time to do that? That's why we left some partners a bit alone and we requested a lot of things from them. There were instances where some partners told us "We don't

understand your logistic procedure and it is so hard for us to follow this without sufficient explanation. It will be the best if we part ways."

- KII, CO Staff, Ukraine

Once support was provided it was generally well-regarded, with many partners noting improvements in technical and management skills due to Action Against Hunger's training and mentorship. Action Against Hunger's efforts were tailored to areas where its partners had indicated they needed support, or where Action Against Hunger considered this to be the case. These areas included monitoring and data



collection (which nonetheless never developed to satisfactory levels in many of the partners), accounting, logistics, security and the technicalities of cash assistance, as well as WASH and mental health. Attention to the latter issue was seen as particularly welcome.

"Before this crisis, I would never have imagined training in anything related to psychology, as I considered myself solely a lactation consultant. However, the crisis highlighted the importance of self-care, effective communication and compassion – for oneself and others. This experience broadened my perspective and motivated me to pursue new training opportunities in these areas. The impact on my personal development has been significant."

– KII with L/N partner staff member, Romania

Action Against Hunger's high staff turnover and differences in staff perspectives on capacity strengthening requirements and preferred methods meant that initiatives appear somewhat *ad hoc*, and the overall package somewhat disjointed. Action Against Hunger assessed the capacity strengthening plan as part of the partners' due diligence assessment. However, the discussions with the CO staff revealed that the training initiatives were not necessarily based on these capacity strengthening plans, or designed with the trainees' needs in mind, or on the basis of an assessment of an implementing partner's pre-existing knowledge and skills. There was also a degree of overlap with other INGO efforts, particularly in Ukraine. This is common in relatively well-resourced humanitarian responses in new regions, where large numbers of INGOs and UN agencies enter

and many of them impose learning requirements onto their L/N partners. Duplication tends to occur most prominently in fields that pose an immediate risk to the INGO's own reputation and priorities, and in the case of Action Against Hunger it occurred in the fields of reporting and financial management. An audit issue related to partner expenses potentially had significant financial implications for Action Against Hunger. Though this risk did not materialize, it created fear within Action Against Hunger and therefore added to Action Against Hunger's focus on its partners' compliance and financial capacity.

One implication of the duplication and the imposing way in which INGOs seek to strengthen local capacities is that partners across the COs had somewhat limited interest in participating in capacity-strengthening activities (as well as in the learning activities covered under CHS Commitment 7, above). Another implication of the INGOs' focus on capacity strengthening is that opportunities offered by the wider international humanitarian sector went well beyond what local stakeholders could usefully absorb. Action Against Hunger's partners therefore did not use Action Against Hunger's indirect cost allowance to further bolster their own capacity, and instead this percentage appears to have been used to merely cover unallocated organisations costs.

Action Against Hunger's support heavily relied on training, which is a form of capacity strengthening that tends to improve individual competencies more than organisational capacity elements such as policies, processes, organisational structure, systems and strategies. One implication is that the durability of the gains in partner capacity depends on their ability to retain their staff. Action Against Hunger also conducted mentoring for the partners. Particularly the partners in Poland and Romania found the mentoring and technical discussions useful.





CHS 9

Communities and people affected by crisis can expect that organisations assisting them are managing resources effectively, efficiently and ethically

Key Finding

With a few exceptions, Action Against Hunger's Response was delivered through L/N partners, and invested in the quality of its partners' accounting practices and their awareness of fraud and corruption risks. This was done through training and mentoring. In this region, Action Against Hunger would probably not have been able to provide larger-scale or more appropriate support through direct implementation.

However, the mis-categorisation of partner staff costs and expenses means that the proportion of funding that went to what DEC defines as 'direct implementation' is lower than what Action Against Hunger's financial reports suggest.

Action Against Hunger could have achieved gains in efficiency and coherence through a clearer process for partners that wished to adapt their work to align with new insights and evolving realities. Facilitation of partner engagement in wider coordination platforms would also have been beneficial.

Action Against Hunger capacity assessments, training, induction and mentoring efforts did not cover the full set of the CHS Commitments. Instead, Action Against Hunger aimed to address what Action Against Hunger saw as urgent gaps. The gaps Action Against Hunger had identified were predominantly in areas such as monitoring and data collection, accounting, logistics, security, sector-specific knowledge in relation cash assistance, WASH and mental health.

EQ 9.1: Did localisation lead to the design of programmes and implementation of processes to ensure the efficient use of resources, balancing quality, cost and timeliness at each phase of the response?

DEC financing empowers the DEC members. Action Against Hunger's grant facilitated the continuity of activities across phases, which helped retain key staff and maintain relationships with Action Against Hunger's partners. The flexibility of this grant enabled the programme to expand or change its geographic focus and to adjust delivery methods when there were reasons to do so. DEC helpfully allowed the programme's underspending to be

transferred to successive phases. (This underspend was modest, at less than 7% until the end of phase 2a, when expenditure had amounted to £5,9 million, against a budget of £6,3 million.)

Action Against Hunger reciprocated by broadly respecting grant conditions. Action Against Hunger spent 64% of its expenditures on direct implementation,¹⁰ against DEC's minimum of 50%. (A misunderstanding of DEC's categorisation

¹⁰ Within Phase 2a the programme allocated the remaining costs as follows: Category B (Logistics): This category includes transportation, storage, and office operations, and took 7% of the total budget (£369,876); Category C

(Personnel): This category covers staff costs, including salaries, benefits, and training, and took 25% of the total budget (£1,399,205); Category D (Personnel Support): This category covered the support costs for personnel, and took 3% of the total expenditures (£180,710).



meant that a portion of this ‘direct implementation’ was spent on staff costs and expenses of Action Against Hunger’s partners, which is not aligned with DEC’s intention for this cost category, but this was discussed with DEC and rectified in the most recent budget.) Action Against Hunger invested in its partners’ accounting practices and awareness of fraud and corruption risks. Action Against Hunger refrained from exploitative practices in relation to its partners, and instead allowed its partners to use a portion of the funding they received to cover indirect support costs (between 2 and 10 per cent, depending on the partner). Action Against Hunger also provided core costs to four Ukrainian partners that were unable to cover their needs from the indirect cost allowance. Some partners noted that such investment was crucial for their survival at the time.

Action Against Hunger’s choice to use partners rather than to implement the response directly was a long-term strategic choice, and a sensible short-term decision in terms of reach, costs and efficiencies. Action Against Hunger would probably not have been able to provide larger-scale or more appropriate support through direct implementation during the emergency period otherwise.

However, a few efficiency gains could have been made, as highlighted in previous sections of this report, including:

- Action Against Hunger’s partners were not aware of the flexibility of DEC funding and sometimes felt constrained when faced with the need to modify the nature and locations of their response.
- While minor adaptations were often swiftly approved, Action Against Hunger’s partners did not have a clear and formalized process through which they could argue for larger adaptations. Such a formalized process could have helped to more consistently ensure efficiency and a more deliberate balance of programme quality, costs and timelines.
- More information sharing with partners, and their engagement in wider coordination platforms, would have led to a lower likelihood of programmatic gaps and duplication of efforts across the sector-wide humanitarian response to the Ukraine crisis.
- In the earlier stages of the programme, Action Against Hunger’s partners found its procurement requirements (particularly for food) to be confusing and cumbersome. Action Against Hunger support to its partners, in combination with partners gaining experience, meant that this problem was resolved in later stages



Localisation Findings

Key Findings

Action Against Hunger implemented its DEC response in four challenging country contexts, all of which were new to Action Against Hunger. In these challenging environments, action Against Hunger tested multiple partnership and localisation approaches. Action Against Hunger did this in the midst of a large-scale rapid-onset crisis, under great time pressure, and without the benefit of pre-existing templates for partnership frameworks and localisation-focused systems, structures and processes.

Action Against Hunger employed a learning by doing approach, and programme modifications demonstrate its adaptability and commitment to improving practices. This approach was evident in Romania, where an intermediary agency was successfully integrated into a project to develop capacity without overwhelming staff. This strategy, along with an appropriate budget, facilitated sustainable and effective capacity-building processes. The **learning by doing** approach was also evident in Ukraine, where learning led to numerous structural and process revisions. Investments in partnerships featured strongly, and in 2023 the CO established a Partnership Department.

However, Action Against Hunger's localisation efforts were hampered by significant weaknesses in its institutional memory, which were exacerbated by the poor documentation of learning and resultant decisions. Record-keeping and documentation practices across all COs were inadequate and made it difficult to maintain a coherent and accessible record of the project's progress.

Coordination mechanisms were also insufficient, and partners were often unaware of each other's activities. While Action Against Hunger participated in cluster meetings and sectoral working groups, the outcomes of these events were not consistently shared with partners, resulting in missed opportunities for collaboration and information sharing. This lack of coordination, and the disconnect between HQ-level strategies and field-level implementation, limited the success of its localisation strategy. Similarly, a key goal of localisation is to support L/N actors (who have the capacity and interest) to participate in decision making fora – but this was not part of its approach on coordination.

Action Against Hunger did not ensure that its localisation policies and objectives were understood and accepted by country office staff. Many staff were either unaware of or did not support Action Against Hunger's localisation goals, resulting in inconsistent attitudes towards partners and capacity-strengthening efforts across various countries.

EQ L1: What were the strengths and weaknesses of the Action Against Hunger localisation approach in the Ukraine response?

Strengths

In the challenging context of a sudden-onset emergency response, Action Against Hunger showcased its dedication to including learning elements into its



operations, and it demonstrated adaptability and a commitment to improving practices. Learning-by-doing inspired numerous structural changes, and revisions in processes and procedures were incorporated at all stages of the project.

Action Against Hunger co-managed the Poland and Romania responses from its country office in Romania. Partners in both countries expressed high levels of satisfaction with the communication. The partners noted that the Action Against Hunger team was approachable and responsive, using various communication methods such as WhatsApp, emails, and regular meetings to ensure smooth coordination.

The Romania CO showcased particularly effective localisation practices. Its capacity strengthening efforts were integrated in the response, through specific outputs that focused both on institutional and technical capacity development. Action Against Hunger used an intermediary agency to assess the partners' institutional capacity, and then to deliver tailored capacity strengthening plans. All interviewed partners were satisfied about this approach and noted the positive effects in relation to the development of systems that were likely to contribute to their long-term organisational sustainability. Action Against Hunger paid particular attention to the capacity strengthening of a national NGO, BRCT, which coordinated with other L/N actors at all stages of implementation. BRCT led the overall response management and Action Against Hunger only provided technical support. This approach aimed to strengthen the management capacities of a national agency and opted for a design that could be used in the absence of Action Against Hunger in the country.

A good practice highlighted for the response was Action Against Hunger's use of due diligence passporting. According to Action Against Hunger staff, this approach enabled faster partner onboarding and

compliance checks, which proved especially effective in complex and rapidly changing humanitarian contexts.

In 2023, the Ukraine CO demonstrated Action Against Hunger's commitment to enhancing partnership management and operational efficiency by establishing a full partnership department. Although this partnership department did not always align well with the work of the programme department, it did help clarify roles and responsibilities, and it developed a strong onboarding process.

Weaknesses

Action Against Hunger's localisation approach exhibited several weaknesses that are likely to have hindered the effectiveness of the response.

- **Localisation principles:** Action Against Hunger's localisation principles are well-known among HQ staff in AAH UK, AAH France and AAH Spain. However, they were not communicated effectively to staff at the CO level. The issue is not covered in Action Against Hunger's onboarding training for CO staff in any of the countries, and not all interviewed CO staff seemed to share the same values in relation to localisation. This meant that Action Against Hunger's relatively comprehensive localisation principles were not fully reflected in the day-to-day operations and understanding of the staff members on the ground.
- **CO structure and staff recruitment:** Action Against Hunger did not have adequate surge capacity in this region, and many key positions within Action Against Hunger were vacant at the start and took months to fill. This hampered the response's effectiveness, delayed critical actions and limited its ability to establish, maintain and nurture relations with its partners.
- **Coordination:** Action Against Hunger often struggled to create an effective coordination mechanism across all COs. Within countries, there were a few



exchange platforms for partners (most prominently in the field of MPHSS), but nonetheless partners were often unaware of each other's activities. Action Against Hunger participated in cluster meetings and sectoral gatherings, but the outcomes of these events were not consistently shared with partners. Country level efforts in Ukraine and Poland existed, but partners in all countries requested stronger engagement and coordination with external bodies. These coordination deficits led to missed opportunities for collaboration and information sharing.

→ **Exit Strategy:** COs undertook a variety of exit-focused activities, but only CO Romania had a well-defined exit strategy. Upon project completion, most partners

were left without the necessary capabilities, resources or support to maintain their activities.

→ **Institutional Memory:** The recordkeeping and documentation practices were inadequate across all COs. Much of the documentation we requested could not be found. Staff we interviewed were often unaware of, or unable to find, critical documents such as partner-capacity assessments, monitoring data and accountability results for COs. Much of the information remained with individual staff members, leading to gaps in institutional memory. This made it impossible to maintain and present a coherent and accessible record of the project's progress and outcomes.

EQ L2: What are the localisation lessons that could be relevant to the wider humanitarian community?

Local actors are the first responders in a crisis. They are most likely to possess appropriate access and localised knowledge. This underscores the importance of localisation. However, translating the localisation principle into action during a sudden-onset emergency is challenging, and even more so for organisations with limited prior localisation and local partnership experience.

Action Against Hunger is such an organisation, and in this Ukraine response it undertook a very difficult and new task for the network. Action Against Hunger teams had to establish four COs from scratch, as the organisation did not have a prior presence in these countries. Action Against Hunger needed to build an operating infrastructure, develop relationships with local partners and gain an understanding of the context in which this rapidly evolving crisis took shape – all under extreme time constraints. Establishing these offices involved recruiting and training new staff,

setting up logistical and administrative systems and navigating complex regulatory environments. Furthermore, Action Against Hunger had to quickly identify and collaborate with appropriate local actors. This was a challenge too, as local actors possessed local knowledge and access but generally lacked experience in humanitarian response.

The scale and speed of this across multiple countries is not something Action Against Hunger has done before and so was not prepared for.

To overcome these various challenges, Action Against Hunger required significant resources and adaptability, a rapid build-up of its understanding of the local context, and robust systems, structures and processes that focus on localization and that are able to withstand the difficulties of a rapid-onset crisis. Templates for such systems, structures and processes are best developed *before* a crisis, and then adapted and contextualised



as the crisis unfolds, but Action Against Hunger did not have them yet.

Developing clear roles and responsibilities is a key aspect of effective localisation. While Action Against Hunger had defined roles and responsibilities outlined in partner agreements, frequent staff turnover led to occasional confusion among partners regarding the roles with its teams. This lack of clarity sometimes disrupted coordination and hindered the smooth execution of localisation efforts. In this context, Action Against Hunger teams noted that a key benefit from its experience is its recognition of the value of having a partnership framework that can adapt to challenging contexts.

A well-functioning due diligence 'passporting process' is of benefit to Action Against Hunger and the wider humanitarian sector. Action Against Hunger used this process in Ukraine. This process accelerated the due diligence process for new partners, by using the previous due diligence outcomes that were conducted by other INGOs. The process involved comprehensive assessments of potential partners, focusing on institutional capabilities, operational risks, financial management, compliance, and adherence to PSEA guidelines. It included a checklist of mandatory requirements, reviews of existing policies, and checks for anti-money laundering and criminal offenses.



Conclusion

Action Against Hunger delivered its DEC response across four complex country settings, Ukraine, Romania, Poland and Moldova. Action Against Hunger undertook a very difficult task, in an emergency setting, and managed to establish impactful programmes in collaboration with local actors despite the challenging conditions. Action Against Hunger's programme consisted of a range of projects, which were generally implemented by L/N actors or partners. For two reasons, this approach was appropriate even though these partners did not have prior humanitarian experience. First, Action Against Hunger itself did not have a prior presence in the region and would therefore not have been able to provide more or better support through direct implementation. Second, working through partners aligns with its localisation policies and objectives.

Action Against Hunger developed a localisation policy and activated it at all stages of implementation. However, Action Against Hunger, particularly at the UK HQ level, did not ensure that its localisation policies and objectives were known and accepted by staff in its COs. The CO staff were often unaware of its localisation ambitions or held views that did not align with them. This meant that Action Against Hunger attitudes towards partners and capacity-strengthening efforts differed across countries and partners. Action Against Hunger's most successful capacity-strengthening work took place in Romania, where an external company facilitated partner learning without imposing unreasonable time requirements on partner staff. This relatively undemanding approach worked well, not just because work pressure was high but also because the humanitarian space in the region was crowded with international organisations that sought to support local and national organisations, who therefore quickly lost their thirst for yet more 'learning'.

One commonality in Action Against Hunger's capacity strengthening efforts was that its offices prioritised what was identified as urgent gaps. Action Against Hunger's Due Diligence Assessments involved distinctive sections for capacity assessment. These plans included some of the key CHS Commitments (duty of care, access & security, safeguarding, fraud and corruption). The set of training for partners mainly focused on the gaps in knowledge and practice related to monitoring and data collection, accounting, logistics, security, sector-specific knowledge in relation to cash assistance, WASH and mental health. In addition, Action Against Hunger invested in its partners' compliance and financial capacity, and intensified this investment following a serious audit concern that posed a significant financial risk (albeit one that did not materialise). Action Against Hunger did manage to reduce or close some of the gaps it had observed, but its overreliance on training meant that the durability of capacity gains depended on staff retention, as training strengthens people's rather than organisations' capacity.

When designing its programme, Action Against Hunger appropriately used a combination of external needs assessments and assessments conducted by its partners. However, at the beginning of the project, data were not consistently disaggregated at all times and for all activities over gender, age or disability and therefore did not build an adequate understanding of the needs, vulnerabilities and capacities prevalent within specific groups.

The end-of-programme underspend has been modest and the early stages parts of the response faced with occasional delays. None of the respondent affected group members noted any issues with the timeliness of the assistance. However, the partners noted that there were frequent delays in the activities. Factors contributing to these delays include its initial unfamiliarity with the region, the absence of pre-existing



partnerships, and difficulties in relation to recruitment, retention and Action Against Hunger offices' roster planning. We saw similar problems in several other Ukraine crisis response programmes.

Action Against Hunger could have achieved gains in its programme efficiency and coherence in at least three ways. First, partners could make minor tweaks to their projects, but the programme did not have a clear process for partners that wished to make more significant changes in order to align with new insights and evolving realities. Moreover, Action Against Hunger could have facilitated partner engagement in wider coordination platforms. Their absence from – and indeed unawareness of – these platforms had two implications. First, access to such platforms would have provided information that may have reduced the likelihood of avoidable gaps and duplication of efforts. Second, their absence from these platforms meant that their voices were not heard by the wider humanitarian sector, and that they were therefore unlikely to have meaningfully contributed to the shape of the humanitarian response to the Ukraine crisis.

The programme's shortcomings notwithstanding, people from affected communities generally expressed satisfaction with the support they had received. Even in absence of a system through which partners could alert Action Against Hunger of significant contextual changes or new evidence, there were multiple instances where Action Against Hunger support remained relevant as it shifted with evolving realities.

Action Against Hunger did not systematically engage with its partners to assess, discuss and strengthen their practice in relation to accountability towards affected communities. Action Against Hunger also did not track and act upon misinformation. However, Action Against Hunger did use multiple channels of communication, and had feedback and complaint mechanisms, both of which were culturally appropriate and used relevant languages. The result was

that people from affected communities felt that they were well-informed and aware of ways to engage with project staff. They also believed that their stated opinions and preferences mattered – even if they were not always informed of reasons for Action Against Hunger not taking suggestions forward.

Towards the end of the programme Action Against Hunger made efforts to help some of its partners thrive beyond the lifespan of its programme. These efforts were largely ad hoc, and outside of Romania they were not underpinned by explicit transition or exit strategies. The results are uncertain in the volatile context of the overall Ukraine response and are likely to be dwarfed by the uncertain longer-term funding environment and opaque criteria for aid distribution.

In this same final period, Action Against Hunger undertook deliberate learning initiatives across its COs. These included post-project workshops, webinars, lessons-learned reports and external assessments. These efforts, as well as learning that occurred in the course of the wider lifecycle of the programme, suffered from limited retrievable documentation, and from the absence of dedicated MEAL staff in the country offices at the onset of the response. The hectic nature of a sudden-onset crisis in a new region, which is typically characterised by high staff turnover and pressure to deliver immediate assistance, further complicated systematic data management and, with that, its ability to use past lessons to inform future actions. It meant, for example, that Action Against Hunger could not learn overall lessons from the feedback and complaints it had received, as it had kept no retrievable records of either. Nonetheless, Action Against Hunger and partner staff confirmed significant learning from this programme, and many could present examples of learning that suggest that, if Action Against Hunger and its partners manage to retain their staff, follow-up programming will avoid some of this programme's weaknesses and build upon its considerable strengths.



Recommendations

The findings of this evaluation lead to the following recommendations:

Recommendation One: To enhance the Action Against Hunger network's humanitarian response capability, the Localisation Working Group should lead the development of a range of templates and guides for delivering localised actions for all HQs. These can then be tailored to specific responses when they occur.

Recommendation Two: The Action Against Hunger network should increase all staff knowledge of, and commitment to, the Core Humanitarian Standard (of which Action Against Hunger is a signatory) and the Action Against Hunger network's localisation policy. The aim of this is to reflect those commitments and principles more fully into Action Against Hunger's response operations.

Recommendation Three: The Action Against Hunger network should lead a maturing of its understanding and approach to localised programming by (for example):

1. Setting (and then training all staff on) a clear vision and strategy for localisation that is aligned to Action Against Hunger's commitments in the CHS.
2. Establishing localisation capability in Action Against Hunger responses, including having the right people (seniority, influence/authority, orientation to localisation and knowledge); and creating a roadmap to deliver the corporate process changes required to enable localised responses.
3. Training all staff on how to implement localised responses with a focus on how to shift power and shift decision making to local/national partners; ensuring partnerships are based on the unique needs and ambitions of each partner; moving away from capacity building and towards a two-way capacity exchange; and supporting partners with the ambition and capacity to participate in humanitarian decision-making fora.

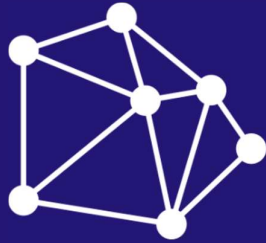
Recommendation Four: Action Against Hunger HQs and country teams should ensure that all data at all stages of the project cycle is consistently disaggregated into gender, age group, location and disability statistics at a minimum. This will help ensure that decisions are evidenced by reliable and accurate MEAL statistics and continue to enable accountable and inclusive programming.

Recommendation Five: The Action Against Hunger network should commission an independent third-party review to identify the extent to which Action Against Hunger's operational programmes are inclusive (e.g., gender, age, disability, minority) and any opportunities for further advancing inclusion in these programmes and the broader Action Against Hunger network.

Recommendation Six: Even in a rapid-onset crisis with high levels of staff turnover, Action Against Hunger HQ's should create a method for ensuring adequate project management records are maintained in a document management system that allows file retrievability.

Recommendation Seven: Action Against Hunger's learning, accountability and programme management processes in the Ukraine Response needs to be more effectively gathering information from local/national partners and affected populations and subsequently used to make faster and more flexible programme adaptations. This learning and the corresponding adaptations should be appropriately recorded to demonstrate the learning cycle.





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