NGOs & RISK

**MANAGING UNCERTAINTY IN
LOCAL-INTERNATIONAL PARTNERSHIPS**

CASE STUDIES:
NORTHEAST NIGERIA & SOUTH SUDAN

USAID
FROM THE AMERICAN PEOPLE

InterAction
A United Voice For Global Change

Humanitarian Outcomes

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AUTHOR

Lindsay Hamsik, InterAction

PHOTO CREDITS

Photos throughout this publication were provided courtesy of the INGOs within the study group including CARE, Catholic Relief Services, Concern Worldwide, Danish Refugee Council, International Medical Corps, Mercy Corps, Norwegian Refugee Council, Save the Children, and World Vision. Additional photos were provided courtesy of the Nigeria INGO Forum.

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ACRONYMS AND ABBREVIATIONS

DFID	Department for International Development (UK)
FTS	Financial Tracking Service
HQ	Headquarters
INGO	International non-governmental organization
INSO	International NGO Safety Organization
L/NNGO	Local/national non-governmental organization
NSAG	Non-state armed group
NSF	Nigeria Security Forces
OFDA	Office of Foreign Disaster Assistance
SSHF	South Sudan Humanitarian Fund
UN	United Nations
UNHAS	UN Humanitarian Air Service
UN OCHA	UN Office for the Coordination of Humanitarian Affairs

RISK AREAS

SAFETY
accident/illness

SECURITY
violence/crime

FIDUCIARY
corruption/fraud/
theft/diversion

**LEGAL/
COMPLIANCE**
violating laws or regulations
of international or host
governments, HR issues

OPERATIONAL
inability to achieve objectives,
capacity/competence gaps,
financial/funding constraints,
access constraints

REPUTATIONAL
damage to image
and reputation

INFORMATION
data breach/loss, digital risk

ETHICAL
risk of harm caused by
unethical behaviors, including
sexual misconduct/exploitation,
inadequate duty of care, or
insufficient consideration
of humanitarian
principles

EXECUTIVE SUMMARY

This report examines partnerships between international NGOs (INGOs) and local/national NGOs (L/NNGOs) in two complex, conflict-driven emergencies: Nigeria and South Sudan. It presents case studies that are one component of InterAction's Risk II: Local Actor Partnerships project – an 18-month research study funded by the U.S. Agency for International Development Office of U.S. Foreign Disaster Assistance (USAID/OFDA). The study involves 10 participating international NGOs (INGOs) and is a part of InterAction's continuing work on organizational risk awareness and responsiveness. This report assesses the risk landscape; the real and perceived risks in local partnerships; and how existing structures, practices, and perceptions hinder or enable effective risk management and mitigation. Its analysis seeks to shed light on how and to what extent INGOs and L/NNGOs effectively assess and manage risk in their approaches to partnering, and how external factors create unintended consequences.

These findings validate the research's global findings, demonstrating that decreased risk tolerance among donors has adverse implications for local partnering decisions and approaches. Global donor trends toward zero tolerance of any incidence (rather than zero tolerance for inaction) are leading to less flexible and more restrictive award parameters in both settings. Increased scrutiny around fraud and aid diversion, either through high-profile investigations or routine audits, diminishes prospects both for more open and shared discussion of risk and for increased tolerance of the risks inherent for an INGO as it works to advance localization.

The case studies are based on interviews conducted in 2018. Their key conclusions are as follows:

- The costs of donor zero tolerance approaches and risk aversion are being borne or subsidized in some form by operational partners.

However, it is unclear what the impacts are and where they reside. Zero tolerance creates fear among partners, diminishes information sharing, and works against more equitable and transparent risk responsiveness and sharing. Donor aversion to risk contributes to more conservative approaches by implementers across programming, decreasing the use of partnership approaches and resulting in unfavorable funding and reporting requirements for all partners. INGOs often invest already limited private funds to support partnership oversight and due diligence to accommodate the donor position.

- In practice, localization is viewed by many donor and UN officials as a vehicle for more cost-effective programming. Where this objective underpins partnering decisions, the true costs of aid delivery are misrepresented. L/NNGOs feel additional pressure to be low cost, further distorting funding needs for effective and safe delivery. L/NNGOs report using negative coping mechanisms (i.e. bad cash flow management), which increase fiduciary and reputational risks. Limited funding for fixed costs in awards to L/NNGOs increase fiduciary and security risks and diminish operational effectiveness. In the end, the costs are borne by L/NNGO staff members who frequently go unpaid, forego safe and secure accommodation, and take additional risks in how and when they move in the field.

- Inconsistent definitions and understanding of different risk categories and how risk is distributed across the humanitarian delivery chain, as well as a lack of systematic information sharing on risk creates "blind spots" across all humanitarian actors, hindering risk awareness and responsiveness. Additional investments are needed to improve a collective understanding of multidimensional risk across the sector and bolster a field culture around risk awareness and responsiveness.

- UN agencies and INGOs all partner with a small subset of "preferred" L/NNGOs. There was a high level of awareness of and attention to general business risk as it relates to an individual organization's own operations. But there was less understanding of the risk organizations are exposed to and distribute beyond their directly implemented programs. Among INGOs, partnering decisions and approaches informed by a clear vision and objectives tend to be more successful and adaptive. Such partnerships foster transparency which facilitates understanding of how risk is distributed, how it can be jointly mitigated, and what risks can be shared.

- Risk tolerance in local partnering is influenced by the status of the humanitarian response and response management priorities. During an operational scale-up, interviews revealed more risk-tolerant partnering decisions and approaches. As conflicts protract and strategic response management shifts to sustaining operational capabilities, greater risk aversion leads to more restrictive partnering approaches.

- In both settings, host country actors have added significantly to the humanitarian access challenges and overall risk burdens. Host government regulatory requirements – including those related to domestic counter-terror laws – and disinformation campaigns have implications for all NGOs and complicate the threat landscape they navigate. Regulatory pressures create additional administrative and operational burdens that need to be considered more systematically in any collective understanding on risk management and mitigation.

- INGOs, recognizing the interconnected fiduciary and security risks for local partners, are said to provide favorable payment models to local partners. This includes upfront disbursements to L/NNGOs before project activities begin, as well as payments in more frequent tranches. Likewise, where activities required verification before additional funding disbursements, it was noted that INGO teams were able to quickly visit and verify partner activities in remote field locations.

- No formal discussion on multidimensional risk currently exists within the interagency coordination structures in either context. There is limited joint analysis on how the response management priorities and structures, changing context, and evolving funding and donor requirements affect the different risk categories and risk tolerance. As a result, there is limited understanding of how risk is distributed and shared across multiple response partners.

- Lastly, how INGOs fund L/NNGO partners is likely creating distortions in the local partner "marketplace". The provision of indirect cost rates or standards on the percentage of administrative support costs provided in INGO-L/NNGO awards remains inconsistent, not defined by policy, and contingent on the partnership or origin of funding. Inconsistent standards for funding L/NNGO support costs curtails L/NNGO cash flow and creates risk. This causes market distortions. A lack of untied resources reduces independent organizational decision-making on risk management and mitigation. Increased flexibility to respond to aid delivery realities may create incentives for greater efficiency and innovation as a result of increased competition. Invariably, some L/NNGOs will either reduce their scale of programming or exit the market entirely if they cannot compete. The result would be a more consolidated group of local organizations that are best equipped to ensure accountable and effective humanitarian programs.

It is hoped that these case studies and analysis will provide context to complement the overall study findings, stimulate dialogue on potential solutions and recommendations for future action, and inspire further research.

Photo courtesy of Concern Worldwide U.S.

Photo courtesy of InterAction.

INTRODUCTION

Global aid organizations increasingly recognize the importance of understanding and effectively managing and mitigating risks in aid delivery. This recognition is a product of the expanding exposure to risks in the last decade, and the relative impact of specific events. Several low-frequency but high impact events have resulted in a growing awareness of significant legal, compliance and fiduciary risks, greater scrutiny, and heightened risk aversion. One such example was the U.S. Office of the Inspector General investigation into international NGOs' (INGOs) procurement practices in Turkey in 2016.

This report uses two cases – Nigeria and South Sudan – to explore how risks are identified and managed in settings where INGOs and local/national NGOs (L/NNGOs) work in partnership. The case studies outline different characteristics, trends, frameworks, and practices which hinder or enable effective risk management in partnerships. With funding from the U.S. Agency for International Development Office of U.S. Foreign Disaster Assistance (USAID/OFDA), InterAction launched the 18-month Risk II: Local Actor Partnerships study in October 2017. This includes global and field-level data collection with a focus on complex, conflict-driven crises. The research seeks to build a body of empirical evidence on the risks present in partnerships between INGOs and L/NNGOs and how they are managed, including through:

- enhancing operational INGO understanding of and enabling learning on risk allocation between INGOs and local actors;

- examining the traditional financial, contractual, and institutional support mechanisms INGOs use to assess and mitigate risks with local partners, and how effective these are;
- providing concrete recommendations on how to identify and manage risk more effectively with local actors. These will be used to encourage improved policy coherence on risk in relevant humanitarian reform processes and with critical stakeholders.

The research is made possible by a core group of INGO participants who have offered guidance to the study, provided risk management and partnership policy documents, facilitated engagement with field leadership and local partners, and offered ongoing inputs to the research design and analysis of findings. The INGO participants are CARE, Catholic Relief Services, Concern Worldwide, Danish Refugee Council, International Medical Corps, International Rescue Committee, Mercy Corps, Norwegian Refugee Council, Save the Children, and World Vision.

In June and July 2018, InterAction conducted field research in northeast Nigerian and South Sudan. Humanitarian Outcomes participated in field research in South Sudan. The countries were selected based on available partnership incidence and UN Office for the Coordination of Humanitarian Affairs (UN OCHA)'s 3Ws (who, what, where) data, as well as input from INGO study participants. Across the two contexts, InterAction interviewed more than 72 aid officials from 48 aid organizations including donors, UN agencies, INGOs and L/NNGOs

SOUTH SUDAN & NIGERIA: A COMPARATIVE OVERVIEW OF THE RISK LANDSCAPE

The emergencies in South Sudan and Nigeria share several characteristics. Each is driven by conflict and characterized by significant impediments to humanitarian access and a high-risk security landscape, measured by the level of attacks against aid workers, generalized violence, and risks to civilians. The emergency responses are further complicated by an increasingly complex regulatory environment driven by host government and donor government regulations. These commonalities and differences – ranging from hostile rhetoric and misinformation to the status of the collective emergency response – affect the overall risk landscape and influence patterns in partnership that are, perhaps, not immediately visible. The same features also influence how aid workers and their organizations perceive and assess risks. Interviews revealed that many institutional approaches to assessing risk rely on formal structures and technical policies and processes. However, many aid workers suggested that responding to risks effectively in such complex settings was more art than science – because often when managing one risk, other new risks emerged.

IRREGULAR AND UNCERTAIN OPERATING ENVIRONMENTS

According to the 2018 Humanitarian Needs Overview, there are more than 7 million people in South Sudan in need of assistance and protection. More than 4 million people have been internally displaced, and another 2 million people have fled the country.[2] Global contributions to the South Sudan humanitarian response in 2018 exceeded $1.24 billion but only accounted for 60 percent of the total appeal. Despite increased needs, 2018 figures fell short of 2016 and 2017 contributions with each surpassing $1.4 billion.[3] Comparatively, the 2018 Nigeria Humanitarian Response Plan estimated more than 7.7 million people needed assistance across three states in the northeast. UN OCHA reported that partners required $1.05 billion to deliver assistance to 6.1 million people prioritized in the plan.[4] By December 2018, $700 million had been raised against the appeal, meaning around 66 percent of needs would be met by year's end.[5]

In recent years, South Sudan's operating landscape has become more irregular and unpredictable for all NGOs. Economic deterioration and currency depreciation led to a sharp rise in theft, robbery, and compound break-ins. In 2015, as the conflict spread, South Sudan overtook Afghanistan as the country with the highest reported number of major attacks on humanitarians. Recent data shows steep increases in the number of national staff deaths.[6] In July 2016, after fighting broke out between opposition and government groups in Juba, government soldiers attacked the Terrain camp compound where aid organizations were sheltering. Uniformed government soldiers looted the compound, killed an INGO national staff member, and gang raped aid workers and compound staff.

The number of reported security incidents in northeast Nigeria since 2016 is comparatively small. Only three incidents were reported during the first quarter of 2018, the lowest reported number since 2016. However, irregular tactics deployed by non-state armed groups (NSAGs), including improvised explosive devices and abductions, fuel uncertainty and escalate security concerns. Proximity to Nigeria Security Forces (NSF) also increase risks for aid operations and staff. This was demonstrated in March 2018 when a NSAG attack on NSF barracks in Rann resulted in an L/NNGO staff member staying at the base being injured.[7] Nigerian armed forces also pose direct threats to both civilians and humanitarian personnel. For example, in January 2017, a Nigerian military airstrike on Rann killed 115 civilians including aid workers.

Large numbers of people in South Sudan and Nigeria are classified as "hard to reach" or "inaccessible". In northeast Nigeria, an estimated 823,000 people remain "inaccessible".[8] Estimates of the number of people in need in hard-to-reach areas in South Sudan vary. The drivers underpinning these classifications are different in each context with some people being inaccessible or hard to reach due to active conflict, the geographically remote locations where they are sheltering, access restrictions, and heightened security risks. In Nigeria, aid organizations attribute the numbers of inaccessible people mostly to government prohibitions and a failure to engage with NSAGs and negotiate security assurances.

HOSTILE RHETORIC, MISINFORMATION AND HOST GOVERNMENT REGULATORY PRESSURE

Some respondents noted that many Nigerian communities, government authorities, and military personnel believe it is impossible to distinguish civilians from NSAG members. Proximity to NSAGs (i.e. being a civilian held under Boko Haram control) is presumed to mean political allegiance which is believed to justify screening, indefinite detention/deprival of due process and life-saving assistance, and discrimination. Discussions on analyzing life-saving needs in hard-to-reach areas – areas that are osten-

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2   UN OCHA, 2017a.
3   UN OCHA, 2018d.
4   UN OCHA, 2017c.
5   UN OCHA, 2017b.
6   Humanitarian Outcomes, 2016.
7   Al Jazeera, 2018.
8   UN OCHA, 2018c.

Photo courtesy of Mercy Corps.

sibly under the control of Boko Haram or its affiliates – or establishing a dialogue with opposition groups often face resistance from and are met with suspicion by local communities, as well as NSF and government representatives. Many people in local communities and the government repeatedly accuse international humanitarian organizations of "feeding the enemy". Local media further perpetuate negative portrayals of INGOs, alleging organizations of corruption and aid diversion, undermining federal and state laws, and driving up costs for rent and food items in Maiduguri.[9] Misinformation and hostile rhetoric are also hallmarks of South Sudan's operating environment. Government officials routinely and publicly contend that INGOs fuel international criticism, provide poor quality services, steal money intended for assistance, and prioritize hiring of expatriate personnel over local people.

In both contexts, the rhetoric can be connected to host government regulatory agendas. For example, government misinformation was heaviest in Juba in the lead up to the passing of South Sudan's NGO law in 2016 and, later, its implementation. In early 2018, misinformation was connected to increased threats of INGO suspensions in northeast Nigeria. The Borno State Governor Kashim Shettima's motivations were made clear during a failed bid to investigate NGOs and stand-up a duplicate subnational NGO registration process. In a speech at the Borno Humanitarian Response Committee meeting, Shettima outlined a strategy to surveil and monitor NGO activities to exert greater control over the humanitarian response. He noted, "The committee will… determine the relevance and quality of the NGOs vis-a-vis the needs of those they serve or those they claim to be serving, especially the IDPs… the committee will look into their modus operandi with a view to finding out whether they are in the state to exploit the security situation and derive benefits from the misery of our people or they are genuinely interested in alleviating the sufferings of our people."[10]

INGOs support coherent and consistent host government regulations that enable coordinated and effective humanitarian assistance. However, increasingly, host country regulations often work against such goals and are instead motivated to hinder or curtail aid delivery. State regulations were never enacted in Borno, but INGOs believe it is inevitable that registrations and operating statuses will be contested again. In South Sudan, the enactment of the NGO law led to the immediate proliferation of bureaucratic impediments, which continue to hinder and complicate operations. South Sudan INGOs and L/NNGO officials noted that managing the regulatory environment requires engaging more with authorities, which is often seen as carrying increased security risks.

SCALE-UP VERSUS SUSTAIN

Perhaps the area where there is greatest divergence between the two responses is in their status. Where aid organizations in South Sudan are focused on sustaining the current scope and reach of the response, through 2017, aid organizations in northeast Nigeria were focused on

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9   See for example Sawab, 2017.
10   Sawab, 2018.

response scale-up and management. As a result, the response underwent a significant shift in scale and scope, reaching more than 5.6 million people over the year. According to UN OCHA's Financial Tracking Service (FTS), humanitarian funding to northeast Nigeria increased steeply from $267.9 million to $731.4 million between 2016 and 2017.[11] The South Sudan response consistently secures more funding year on year. However, levels stabilized in 2015 at around $1.4 billion annually. Humanitarian needs have increased considerably each year in the country, requiring organizations to achieve more with less.

In Nigeria, the scale-up required establishing presence in locations the Nigerian government labeled as newly "liberated" local government areas. This required NGOs to establish presence in locations where they previously had none, recruit staff, set up partnerships, and build acceptance with local communities, among other activities. The operational scale-up coincided with a system-wide mobilization to strengthen capacities across humanitarian leadership, coordination, delivery, support, and funding mechanisms. Before 2016, the structures, systems, mechanisms, and capacities enabling the response today did not exist. Likewise, the relative lack of familiarity with the context in the northeast necessarily adds to the level of uncertainty and heightened perceptions of risk among INGO staff.

With the current South Sudan conflict entering its sixth year, the humanitarian situation continues to worsen and is compounded by the spread of violence and deteriorating economic conditions. Though the number of people in need increases each year, the humanitarian response is largely focused on *sustaining* capacity, response management, and program effectiveness. The fluid operating conditions and shifting geographic scope of needs requires partners to access new locations, but the current operational configuration is mostly fixed. Established field bases serve as platforms to access more remote, hard-to-reach communities. Though staff continue to be employed on short-term cycles, which requires regular training of common services and coordination systems, many officials interviewed describe the response setting as "routine" and "business as usual".

MILITARIZED OPERATING CONTEXTS, FREEDOM OF MOVEMENT, AND OPERATIONAL CONFIGURATIONS

In Nigeria, many restrictions on humanitarian delivery and access originate with the NSF. Assistance and presence of aid organizations are confined to "liberated" local government areas. Nigerian military forces control these areas and limit humanitarian movement beyond their perimeters. Movement restrictions are common, especially those related to specific goods like fertilizer, fuel, or food. In South Sudan, access impediments are diffuse, imposed at many levels across multiple locations both by government and opposition groups. Movement restrictions are also common in South Sudan, though less systematic, with impedi-

ments experienced by many actors, in many areas, and at various levels. NGOs in both contexts rely, to some extent, on semi-static or remote management modalities. Movement restrictions in Nigeria curtail risk awareness across operational organizations and, thus, informed analysis. South Sudan aid organizations move relatively freely, maintaining static and semi-static operations in around 80 locations. Unlike crises such as Syria where aid organizations depend heavily on remote partnering, INGOs sustain presence in many deep field locations. This presence provides crucial first-hand information and analysis on potential threats and access constraints, and facilities improved risk awareness.

Donors in South Sudan are said to view static deep field presence as high risk, particularly in areas where NGO compounds have been looted and destroyed multiple times. The perception that donors will not recapitalize field assets and infrastructure in the event of repeated looting or destruction contributes to INGOs perceiving heighted risk in these areas. This has contributed to an increased investment in mobile response capabilities, particularly in volatile settings like South Sudan's southern Unity State. Often, national staff presence is continuous but international staff presence is reduced. In northeast Nigeria, INGO deep field presence relies on continuous national staff presence. It is complemented by multi-day visits but limited long-term presence of international staff. Some barriers to increased presence of mid-level management staff in the field include minimal investment in security management coupled with limited deep field infrastructure to house humanitarians for longer periods, UN Humanitarian Air Service (UNHAS) capacity constraints, and a lack of evacuation capacity in the event of an attack. Recent donor support to establish humanitarian hubs, and bilateral investments to NGOs to invest in their own field infrastructure, enable more sustained presence and, critically, physical separation and reduced dependence on NSF support for deep field accommodation. However, this support has not reached L/NNGO partners who still lack field infrastructure and sufficient resources for accommodation.

L/NNGO CAPACITIES

Local NGOs in South Sudan and northeast Nigeria differ in number, size, experience, and capacity. The South Sudan NGO Forum has 214 registered L/NNGO members. Local partners in South Sudan have diverse technical capacities with many delivering multi-sector responses in various locations. They have grown in terms of overall funding and number of projects being implemented.[12] Since 2014, investments have been made to better integrate local partners into coordination structures and build their capacity to access humanitarian funding opportunities. For example, the South Sudan NGO Forum staffs a dedicated position to support L/NNGO capacity strengthening both in Juba and at the state level. In 2015, a UN OCHA senior L/NNGO advisor worked with local organizations to build L/NNGOs' understanding of the humanitarian system, engagement

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11   UN OCHA, 2016, 2018b

12   See for example the number of NNGO recipients of South Sudan Humanitarian Fund awards. UN OCHA, 2018d. .

within it, and funding mechanisms such as the South Sudanian Fund (SSHF). Many cluster response strategies also include work to increase and sustain engagement with local organizations.[13]

Local civil society in northeast Nigeria was relatively underdeveloped before the response scale-up and remains so. The Network of Civil Society Organisations in Borno State (NECSOB) serves as the convening platform for L/NNGOs there and includes around 160 L/NNGO and civil society members. No additional data on NECSOB members or those involved in humanitarian activities was immediately available. Many L/NNGOs interviewed for this study expressed a lack of familiarity with the international humanitarian system, programs, principles, and financing mechanisms. Local organizations are relatively small with technical capacities focused in one or two sectors. Many implement small, activity-based grants and expressed a willingness to learn and grow.

INTERNATIONAL LEGAL AND REGULATORY SCRUTINY

Host and donor government domestic laws and policies, international counter-terrorism laws, and sanctions regimes all fuel uncertainty and create additional burdens for implementing organizations in Nigeria and South Sudan. Counter-terrorism laws prohibit material support being provided to designated terrorist groups. The term "material support" has no strict definition and tends to be broad in scope. For example, even a training offered to members of designated groups on compliance with international humanitarian law could be interpreted as material support and create liabilities for the implementing organization. The "chilling" impacts these laws have on humanitarian assistance are well documented.[14] In Nigeria, key informants noted the laws curtail and create fear around humanitarian engagement with NSAGs in the northeast. The associated fear is said to discourage collective strategies to open a dialogue with NSAGs (i.e. Boko Haram, a designated terrorist organization) and advance efforts to secure humanitarian access in new areas.

Counter-terror laws allow scope for donor governments to impose additional restrictions on NGOs through contractual and award clauses. These clauses require partners to provide a higher standard of assurances to donors that their assistance will not directly or indirectly benefit designated groups or sanctioned individuals. Clauses are often vague, do not specify standards for compliance, and leave the contract language open

to interpretation by the recipient. According to multiple sources, the US recently added new language to both NGO and UN agency award contracts in Nigeria. The language, referred to by partners as the "Lake Chad Basin" clause, outlines the following requirement:

> *The Recipient must obtain the prior written approval of the USAID Agreement Officer before providing any assistance made available under this Award to individuals whom the Recipient knows to have been formerly affiliated with Boko Haram or the Islamic State of Iraq and Syria (ISIS) – West Africa, as follows: fighters, non-fighting members, individuals who may have been kidnapped by Boko Haram or ISIS-West Africa but held for periods greater than 6 months, and those under the control or acting on behalf of the same. Former affiliates do not include civilian populations who only resided in areas that were, at some point in time, controlled by the groups. The decision of the USAID Agreement Officer Shall be provided promptly to the Recipient. Under no circumstances will the Recipient be obliged in this context to share any individual/personalized beneficiary data with the US Government.*

South Sudan, on the other hand, does not have a designated terrorist group present in country. This reduces some of the legal and operational risks for humanitarian agencies and the likelihood that additional donor requirements for assurances and verifications will be introduced. However, the U.S. Office of Foreign Assets Control (OFAC) does include targeted sanctions against South Sudanese nationals.[15] INGOs should expect additional future designations as the conflict persists or the current peace agreement is abrogated, which should only further heighten regulatory scrutiny. It was noted that current contracts between INGOs and L/NNGOs include language around OFAC requirements; however, there was no common approach on how best to raise awareness among partners as new designations arise. The general environment of fear and suspicion contributes to poor information sharing. The perception that the government is surveilling many local and international NGOs is effectively leading to self-censorship internally to staff and externally to partners. Several INGO officials noted a sense of confusion on how to safely communicate sensitive information to staff and partners such as that a frequented restaurant "Home and Away" in Juba had been labeled "off limits" due to recent US sanctions designations.

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13   South Sudan L/NNGO success and performance today may be partiality attributed to South Sudan's history of protracted conflict and long-term investments in relief and development in the country. From the signing of the 2006 Comprehensive Peace Agreement (CPA) until the start of the current conflict in 2013, the international community channeled billions of dollars of development aid to help build the capacity of the new state, put in place good governance mechanisms, and promote civil society growth and inclusion. Through long-term development programs, many of which provided "capacity strengthening" to nascent civil society groups in the form of small grants and institutional support, INGOs incubated some of today's largest and most successful local humanitarian organizations. Local NGO officials stated that their current success was a product of these programs and past investments to develop structures and systems for receiving grants. However, some experts have detailed how the post-CPA "capacity building" experience also created a demand-driven civil society model that resulted in high expectations for dedicated and sustained funding, but limited ownership and accountability for long-term organizational sustainability.

14   See for example Norwegian Refugee Council, 2018 and Pantuliano et al., 2011.

15   See for example U.S. Department of the Treasury, 2017.

TRENDS IN LOCAL PARTNERSHIPS

PARTNERING AND RESTRICTED HUMANITARIAN ACCESS

Nigeria and South Sudan differ from other protracted conflict settings where INGOs have reduced or no operational presence and thus, rely entirely on remote partnering approaches. In both settings, INGOs and L/NNGOs work in roughly the same areas. In South Sudan, L/NNGO capacity is greater than among emerging Nigerian L/NNGOs, and they often provide "last-mile" services and access some of the hardest-to-reach areas. South Sudan and Nigeria INGO officials described approaches to partnering that aim to increase coverage and deepen and sustain engagement with local communities. Maintaining community acceptance in Nigeria is complicated when NGOs rely on semi-static programming. A sustained local partner presence can complement semi-static INGO programming and supports community dialogue and continuous engagement. Nigeria INGO officials noted that partners are not sent to a location if INGO staff cannot access that same location. South Sudan L/NNGOs noted that the ability to access locations was more a product of a higher risk tolerance, the ability to travel by road instead of relying on the UNHAS flight destinations and schedules, and willingness to work with less field infrastructure support. Field operations are logistically complex and risky in each location. South Sudan suffers from a dearth of field infrastructure whereas northeast Nigeria has equipped many remote field areas with humanitarian hubs for accommodations.

The term "humanitarian access" continues to be used in relation to many different issues – people's ability to reach services, the ability to reach areas where people in need are located, logistic capabilities, community acceptance, safety and security, regulatory obstacles, and restrictions on humanitarian delivery and movement. The lack of clarity around the term means proposed solutions are not always appropriate. For example, in South Sudan aid workers often refer to deteriorating "humanitarian access conditions" when referring to insecurity faced by aid workers. Nigerian L/NNGOs regularly use the term to describe a comparative advantage securing community acceptance. South Sudan L/NNGOs use the term to refer to their higher risk tolerance and ability to operate under austere conditions.

Inconsistent definitions and uses of "humanitarian access" cause misunderstandings and overestimations of L/NNGO field presence. Multiple L/NNGOs in Nigeria noted they had presence in areas where INGOs did not. However, UN operational presence data did not support these statements.[16] Overestimating operational presence is not a new phenomenon, nor is it unique to L/NNGOs. Research shows that, particularly in conflict-driven crises, "aid organizations have incentives to appear more present than they actually are…"[17] Overestimation of presence in Nigeria hinders performance and curtails risk awareness and responsiveness in partnerships. L/NNGO officials did not account for program start-up costs in areas where they overstated their own presence. Funders did not appropriately verify presence, resulting in under-supported and underfunded partners. These scenarios were made more likely by poor planning, pressure to scale up, limited transparency, overstatements by L/NNGOs on their own operational presence, and donor assumptions that L/NNGOs have "better access". Interviewees recognized that under-supported programs impact program quality and response timelines, and cause L/NNGOs and local staff to shoulder additional risks.

It was noted that global narratives on L/NNGOs "having better reach and access" in areas otherwise inaccessible to international aid organizations are counterproductive in the northeast Nigeria response. Donor governments, in search of quick fixes to access new areas and frustrated with a perceived low-risk appetite of INGOs, were said to have generated an inaccurate narrative that L/NNGOs have or could establish access in unreached areas. Multiple INGO, UN and L/NNGO interviewees noted that accessing hard-to-reach people in need, under Boko Haram's control, cannot be achieved solely through local partners. L/NNGO directors themselves noted there were areas they wouldn't dare go as individuals. A focus on exploiting L/NNGOs to establish access results in two potential outcomes. First, it diminishes analysis and planning for a realistic solution. Second, in the worst-case scenario, it places L/NNGOs at significant risk by encouraging their deployment to areas where security assurances are weak or non-existent.

Narratives that L/NNGOs benefit from better access to populations in need than INGOs are equally common in South Sudan. The statement is true in specific response areas – Southern Unity for example – but evidence confirming that L/NNGOs have better access across the country more generally is inconsistent and largely anecdotal. Many of these statements seem influenced by specific interpretations of incident data reported in the South Sudan Humanitarian Access Snapshot and other outside studies. The data reinforces perceptions that certain types of organizations enjoy better access than others. For example, UN officials interviewed conflated fewer reported access incidents affecting L/NNGOs with L/NNGOs having better access. The same officials believed L/NNGOs are less exposed to risk and as such, viewed them as less risky partners. There was little recognition that L/NNGOs traditionally do not report incidents. Such generalizations and logical fallacies are problematic as they often obscure the operational- and context-specific factors associated with reaching and sustaining delivery to people in need. Generalizations also devalue the types of risks organizations undertake in operations. The outcome is that a partner's willingness to accept significant risk –not how they best manage risk – is often conflated with "having better access." Partnering decisions appear to be heavily influenced by this logic in South Sudan.

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16   UN OCHA, 2018a.
17   Stoddard, 2016.

STRATEGIES AND APPROACHES IN PARTNERING

When organizations invest in strategic and systematic approaches to partnerships, they are likely better able to forecast and mitigate risks to their own organizations and local partners. Strategies and approaches to partnering varied between South Sudan and Nigeria. The variance can be associated with the status of the response itself and whether it is rapidly scaling up or focused on sustaining current response capabilities. INGO emergency teams deployed during a response onset and scale-up often lack expertise in partnering. Instead, skills and team composition centered on logistics, operations, and technical capabilities. This may explain how partnering, at least in the initial phase of a crisis, is assessed against technical or operational parameters rather than strategic ones. In Nigeria, the overemphasis on technical and operational considerations in partnering decisions resulted in unclear and poorly defined strategies for when, how, why, and with whom to partner.

"[W]e don't have a strategy. We just say, 'You're a partner. You look good enough'," a senior INGO official said. "We do all this sub-recipient financial monitoring and we never sit down with them and ask what they want to do and how they want to do it."

Though not defined in policy, INGO officials in northeast Nigeria generally described three implicit motivations for partnering with L/NNGOs. First, partnerships in the form of short-term service contracts act as a recruitment vehicle for project activities that require day labor (i.e. beneficiary selection, community sensitization, and distributions). This effectively extends the INGO's human resource platform at a fraction of the cost. Second, INGOs rely on local partners to support the soft components of program delivery including community engagement, sensitization, and mobilization. Third, several INGOs partnered to carry out hyper-local interventions such as family tracing and reunification and other protection activities.[18]

CONTRACTING VEHICLES

In South Sudan, INGOs adopt several different contractual and programmatic approaches in local partnering. L/NNGO partnerships were most common in multi-year programs, consortia programming, and among INGOs with unrestricted resources. Multi-year programs allowed the necessary resources and time for INGOs to adopt cooperative partnership models with capacity strengthening components, rather than pure subcontracting. These consortia models commonly function as a standard subcontracting arrangement with fiduciary risk managed through tight controls. Support to L/NNGO risk management and mitigation, beyond fiduciary risks, is ad hoc and confined to training or the in-house capacity an INGO has at a given time.

Some INGOs subsidize the risk of partnering with private and unrestricted resources, which are most commonly used to increase fiduciary controls and oversight for sub-award recipients. Such investments are costly. One INGO invests $300,000 of private resources annually in South Sudan alone to ensure robust partnership management structures for financial reporting and compliance. It was noted by many that donors, often requiring or encouraging localized approaches, rarely fund the necessary administrative functions to ensure accountability. In an alternative model, some INGOs use unrestricted revenue – less exposed to legal or fiduciary risks than bilateral funding – to issue small grants to local organizations which are then implemented alongside an existing donor-funded program. This model was said to create additional space for mentorship. The approach tends to favor technical skills building rather than institutional system strengthening. The distinction is important because in the case of the former, new skills reside with individual staff members trained. Investments are lost when staff leave organizations – a common problem in South Sudan and Nigeria's high-turnover environments. The two models pose critical considerations for localization. Are such models effective and the best use of an organization's most flexible funds? Can these models be scaled given the limited availability of private funds? As the availability and prioritization of private funding varies by INGOs, does a reliance on private resources to support localization create biases in where, with whom, and how INGOs partner?[19]

Contracting mechanisms and grant conditions also hinder or enable risk sharing, particularly in volatile contexts with fluid access, safety, and security conditions. INGOs use several payment methods including service contracts (fee for service), tranche-based funding arrangements (milestone based), and reimbursements (milestone or results based). Tranche-based funding was said to be the most flexible and preferred by many L/NNGO officials. However, any number of requirements can be applied to funding arrangements, making it difficult to assess which contracting vehicle is most supportive of improved risk sharing.

More reliable and flexible funding allows partners to adapt approaches, minimize reporting burdens, and ensure program teams are resourced accordingly. This funding is characterized by reduced reporting burdens and frequency, and reduced oversight through audits and programmatic spot checks. As such, it increases fiduciary risks for the granting organization and may diminish early warning detection. Practically, managing fiduciary risks is often at odds with managing operational risks. L/NNGOs officials said they were reluctant to broach the topic with both INGO and UN partners for fear of losing funding. They also said there was no evidence of flexible approaches from funders and assumed any request

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18   See for example InterAction, 2018.

19   The Accelerating Localisation through Partnerships program – undertaken jointly by ActionAid, CAFOD, CARE, Christian Aid, Oxfam and Tearfund – aims to support and advance local humanitarian leadership in Myanmar, Nepal, Nigeria and South Sudan. The program includes research on practices in local partnership models in the four countries. Findings are expected to further inform best practices in partnerships that support localization. See for example www.christianaid.org.uk/about-us/programmes/accelerating-localisation-through-partnerships

would be denied. In both settings, there was no evidence of discussion across operational organizations on how to balance and burden share between these two interconnected risk categories.

EFFECTIVENESS, EFFICIENCY AND CAPACITY STRENGTHENING

Various objectives underpinning localization – the sector's commitment to have a greater proportion of the response delivered by local actors – lead to different outcomes for partnerships and risk management. For example, donors and UN agencies across both contexts described how localization can drive efficiency and produce greater value for money. L/NNGOs emphasize their relative affordability in terms of salaries and operating costs. Very few donor, UN or L/NNGO officials described localization as a means to improve outcomes. Broadly, many INGOs, UN and donor officials noted that long-term benefits of localization are set to incur short-term tradeoffs in outcomes, which sits poorly with humanitarian principles and prioritized responses.

INGOs expressed concern that donor calls for efficiency cannot be reconciled with improved approaches to partnerships. Successful local partnerships require multi-year timelines to initiate, cultivate and build – and additional human and financial resources to manage partnerships and strengthen organizations. Instead, using localization to advance a more cost-effective response results in disjointed and ad hoc support to L/NNGOs. Moreover, efficiency objectives contradict the original intent of the localization agenda – improved outcomes for people in need. Localization for efficiency and "savings" orients around short-term financial objectives, lacks a common vision and strategy for sustainability and impact, and encourages transactional partnering models often characterized by unequal risk sharing.

These objectives also drive an unequal distribution of investments in capacity strengthening. UN officials in South Sudan and Nigeria described how UN programs benefit from INGO investments in L/NNGOs such as mentoring, training, and systems strengthening. Many UN officials acknowledged that INGOs assist L/NNGO partners through an array of technical support that is difficult to accurately capture, quantify, or value.

For example, an INGO in South Sudan trained partners on the World Food Programme's new commodity tracking system. Another INGO funded senior L/NNGO staff to attend a regional security training. In Nigeria, an INGO offered on-site security training for local partners. One INGO country director described a vital partner responding in one of South Sudan's most high-risk areas. The partner's performance did not meet expectations and financial and administrative processes were not being followed. On the verge of terminating the partnership, the INGO instead found resources to provide financial and logistics mentorship, technical support, and monitoring training. The investment paid off.

"The partner is in a very different space now and they get a lot of other funding and partner directly with other donors," the country director said.

Despite evidence of support, L/NNGOs expressed frustration that capacity building was not comprehensive, continuous, or resourced long term. As one Nigeria local director explained, "[INGOs] come and teach you safety and security communications, but then they don't give you budgets to buy a Thuraya [satellite phone] for your program."

One-off or ad hoc capacity-strengthening approaches were common in South Sudan, too. Investments in capacity building appear to be reactive or deployed to prevent potential non-compliance with donor requirements.

"Capacity strengthening is not integral. It is just a product of the stressor of the project," a South Sudan L/NNGO director said.

Local partnerships would benefit from greater connectivity between program design, capacity strengthening plans, and the budgets underpinning both. Where a project cannot be resourced with capacity strengthening and support, ongoing relationship building and regular informal dialogue between INGOs and L/NNGOs is critical to maintaining a common understanding, identifying opportunities, and setting shared expectations.

Photo courtesy of Nigeria NGO Forum.

RISK AWARENESS AND RESPONSIVENESS

Almost all organizations viewed security as the most critical and immediate threat to aid in northeast Nigeria and South Sudan. Fiduciary risks were noted as a close second by UN and INGO officials. After security, L/NNGOs viewed financial risk and institutional survival as the most immediate threat to delivering assistance. There was significant evidence in South Sudan of a robust culture of risk awareness and dialogue, both within management teams as well as informally between agencies.

This did not hold true for Nigeria. Rather, across all organizations from donors to local responders, the conversation and understanding on multidimensional risk was less developed and forward-looking. This was evidenced by varying and inconsistent knowledge on different risk categories, their interactions, and context-specific drivers. Many INGO staff in Nigeria described risk management as a box-ticking exercise or "someone else's job". As one INGO official described it, "You talk about [risk] during the technical review of a proposal, but it just feels like talking." The evident disconnect between risk management structures in Abuja and program teams in Maiduguri demonstrates a need for complimentary bottom-up approaches. Field teams recognized the need for risk analysis and mitigation at the Maiduguri level, which would present an opportunity to improve analysis on underlying risk drivers and strengthen system-wide awareness and responsiveness.

Differences in the availability of independent conflict and context analysis also influence organizations' risk awareness and responsiveness. Where such analysis is available in Nigeria, it was said to be subject to various biases or so sanitized that it was no longer useful in risk forecasting. Many officials interviewed in Nigeria described the analytical gap – both in terms of balanced information and timeliness of information – as a hindrance. South Sudan, on the other hand, has long benefited from a small cadre of aid workers dedicated to conflict and context analysis. These roles have helped organizations better understand and anticipate risks. Several interviewees noted, however, that the recent departure of some of South Sudan's more experienced analysts created a gap in information sharing and analysis.

AWARENESS, ASSESSMENTS AND ENABLING FACTORS

South Sudan L/NNGOs view risk through multiple interrelated categories, but it was not clear whether this awareness improved risk management. Nigeria and South Sudan L/NNGOs did not describe how their organizations identify threats and opportunities, assess priorities, or design appropriate responses. Except for fiduciary risks – the effective management of which is required to secure funding – risk is under-managed or not

managed at all. Local directors attributed this to a lack of both funding, capacity, and pressure to program.

Inconsistencies in administrative support costs or indirect cost rates to local partners, as well as funding flexibility and continuity, was cited by L/NNGO officials as the most significant driver in the under-management of risks. Many of the L/NNGO officials in Nigeria and South Sudan said systems development has been minimal with formal planning focused on program development and fundraising. The immediate goal is organizational survival. A highly competitive funding environment paired with donor pressures for partners to demonstrate greater value for money leads some organizations to accept projects that do not align with technical capabilities, have outsized risk, and include unfavorable donor requirements or budgets. L/NNGOs criticized donor award parameters and additional reporting burdens, noting expectations were unmanageable without appropriate funding for administrative support costs.

"You wonder how the activities will implement themselves and report on themselves and be accountable for themselves," one national director in South Sudan said.

Some INGOs do cover indirect costs for some partners. Practice varies by partner, project, and origination of funds. L/NNGO officials described a more constructive dialogue around administrative costs with INGO partners, though scope to improve standards and harmonization remains. While much can be done with non-monetary investments, few examples were identified in either context. Greater collaboration and transparency among agencies are the first of such no-cost investments that could improve organizational risk awareness. In South Sudan, officials described cases where agencies, donors, and NGOs came together to share information and exchange ideas. One donor described a recent consortia kick-off meeting where INGO and L/NNGO partners integrated a discussion on risk management into the inception workshop. The donor noted that the collaborative approach increased confidence. In Nigeria, the humanitarian community's capabilities to assess and manage risk jointly is less developed. Joint conversations on multidimensional risk have not taken place. Instead, agencies struggle internally and in isolation with limited exchange of risk experiences or analyses.

SECURITY

A pattern of blame shifting and labeling related to security persists in both settings. In Nigeria, UN agencies said L/NNGOs took unnecessary risks by not following UN Department of Safety and Security (DSS) protocol. UN

officials also questioned the utility of sharing information with INGO and L/NNGO counterparts who they believed unlikely to follow DSS security recommendations. L/NNGOs directors in South Sudan and Nigeria said they were unable to manage staff security because INGOs and UN agencies did not provide capacity training or funding. UN and INGO funders said they were unable to provide safety and security support if L/NNGOs did not integrate these costs into proposal budgets. Many local officials said they were either not aware of the need to integrate security budgets into proposals, that budget templates lacked dedicated security lines, or in cases where these costs had been forecasted, the L/NNGO was told it "was too expensive" and "encouraged" to revise the budget.

Overwhelmingly, all officials interviewed in both settings agreed that the impact of safety and security incidents is disproportionately felt by national staff – of INGOs and L/NNGOs. Within limited security support and structures, L/NNGO staff confront a range of threats including intercommunal violence, looting, detentions, harassment, and killings. National directors described several cases where security risks increased due to donor pressures and limited flexible and supportive award funding. In one instance, a UN donor pressured a local partner to move a vehicle to a program site. The L/NNGO director said this resulted in a road ambush leaving multiple staff dead. According to the director, the donor did not facilitate the recovery of staff bodies or provide compensation payments to surviving families. INGOs, via the South Sudan NGO Forum, pooled resources to provide compensation to the families and cover burial costs. In Nigeria, an L/NNGO staff member was shot and seriously injured during a NSAG attack on Nigerian military barracks in Rann, where they were staying with local military.[20] At the time, humanitarian hubs were not yet established and there were few, if any, alternative accommodation options.[21] Despite the subsequent improvements to deep field infrastructure, L/NNGO directors noted that resources to cover the nightly accommodation in humanitarian hubs are not sufficient.[22] This increases the likelihood that staff will depend on NSF barracks or other suboptimal accommodations.

"The amount the [humanitarian hub] charges for a night is almost our entire daily per diem," the L/NNGO official said. "You spend the whole of the per diem for accommodation. What is my staff to eat?"

The International NGO Safety Organization (INSO) in Nigeria provides safety and security information sharing services for INGOs but the services do not extend to Nigeria L/NNGOs. INGOs set up structures to informally extend INSO services to their partners. For example, many INGOs have a process for submitting movement requests (through INSO) for their local partners' personnel when needed.[23] Multiple INGOs also set up safety and security information sharing through partner-specific WhatsApp groups, as INSO safety and security information is not presently shared with local actors. Some INGOs also provide their partners in-house safety and security trainings – a good practice that should be expanded further and strengthened. The South Sudan NGO Forum provides safety and security support to both INGO and L/NNGO members in the form of information collection and analysis, emergency evacuation coordination, peer-to-peer guidance, representation, and civil-military coordination. The same standards of services are provided to INGO and L/NNGO members alike.

All INGOs and UN officials attributed local partners' higher risk tolerance to their awareness and knowledge of local communities and an ability to "blend in". This false assumption reinforces another – that local partners require fewer resources, and sometimes none, to manage the threat environment. This mindset, paired with a value-for-money approach to localization, causes L/NNGOs to put staff safety and security second to organizational survival. UN and INGO aid officials acknowledged that local partners, under pressure to ensure institutional survival, often depress the real cost of doing business and rarely incorporate safety and security costs into program budgets.

"National organizations are so dependent on our funding that I sometimes wonder if they are scared to ask because they want to be competitive in pricing," a South Sudan UN official said.

Despite this recognition, most UN and INGO funders provide minimal guidance on security support or risk management protocols and do not encourage partners to integrate security costs into proposals. When guidance was provided, it was done so informally. UN and INGO officials noted that such guidance would encroach on organizational independence though this was described more as a useful pretext to sidestep responsibility for partner safety and security. It is telling that "organizational independence" is not considered when funders prescribe financial reporting standards and processes.

STAFF CARE AND CONTINUITY

In both settings, L/NNGO officials described frequent delayed award payments, especially among UN funders. L/NNGOs cope by suspending salary payments, reducing field per diems, and minimizing other staff support expenses such as field movements. These stressors, when

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20   Al Jazeera, 2018.

21   It was noted that L/NNGOs and local staff have a different relationship with Nigerian armed forces. Greater proximity is said to minimize risk for local aid staff.

22   The nightly fee for accommodation in the humanitarian hubs is $6.

23   Movement requests are submitted to the Nigerian military at a weekly meeting that was convened by OCHA but is now organized by NSF in Maiduguri.

paired with uncompetitive pay and few benefits, fuel staff turnover. The turnover complicates continuous risk management and compromises program quality. The departure of just one highly-qualified L/NNGO staff member can cripple an organization's programming or administrative functions. For INGOs, high turnover in partner organizations means institutional support is needed throughout the award cycle. However, repeated investments in training and mentoring can be cost-prohibitive, challenging to sustain, and have diminishing returns.

Where L/NNGOs and their staff appear most exposed is in the lack of insurance for employees and resources integrated into grant budgets for field emergencies. For example, L/NNGOs said they do not plan or consider budgets for staff evacuation costs in the event of an illness or other emergency. National directors were not aware that INGOs sometimes fund staff insurance under personnel costs. Neither context has a public insurance market. In South Sudan, INGOs create an ad hoc national staff insurance scheme and fund the cost as a fringe expense. A proportion of the fringe benefit is banked and later disbursed when the contract ends or in the event of critical injury or death. Integrating these costs into awards is possible but would require a phased approach and documentation demonstrating evidence that benefits had been paid out to staff. It was not immediately clear if INGOs follow a similar model in

Nigeria. South Sudan's 2017 labor law imposes a legal requirement that employers make payments into a social insurance scheme on behalf of employees and provide six months' severance in the event of an employee's death during service with an employer.[24] The evident gap in insurance structures in existing L/NNGO personnel costs raises questions around potential legal risk if local partners are found to be non-compliant with relevant labor laws.

All NGO national staff receive more acknowledgment from international officials for the physically demanding and risky "last-mile" services they provide, particularly in South Sudan. National directors shared specific and detailed cases of critical incidents involving staff, yet they attributed both blame and responsibility to INGO and UN donors, the aid community broadly, and various coordination mechanisms and common services. This suggests a misinterpretation of collective accountability and where ownership for staff safety and security rests. It highlights what the research team viewed as a general reluctance on the part of L/NNGO leaders to prioritize and ensure staff care. An international aid worker with recent experience coordinating deep field evacuations in South Sudan linked the rising numbers of L/NNGO staff killed every year to a lack of accountability among L/NNGO leadership. The aid worker described cases where L/NNGO directors were unreachable during coordinated

Photo courtesy of Nigeria NGO Forum.

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24   Ministry of Justice, South Sudan, 2017.

evacuations or could not provide an accurate number of staff in field locations or information on staff locations in relation to the evacuation point.

"If you mix little to no security mindset and a pressure to deliver in messy areas because the organization needs money, staff are going to get hurt," the aid worker said.

This experience raises two important questions for INGOs in their local partnering. First, to what extent should partnering decisions include an assessment of how L/NNGO leaders execute their duty of care to their own staff? And second, what are the enabling award conditions, policies, and structures that support L/NNGO leaders to be better stewards of staff care? For one INGO in South Sudan, this question has meant providing guidance to local partner leaders on how to make sure staff are rotated out of deep field locations periodically, and have sufficient food and rations, as well as direct lines of communication to leadership.

OPTING OUT OF RISK

In both settings, L/NNGOs lacked processes for determining their own risk thresholds. Decisions to accept unfavorable program budgets and donor requirements or operate in dangerous locations were driven by institutional survival or an expressed responsibility to "help our people". Many L/NNGOs in both settings said it was common practice to accept award parameters and programs viewed as impossible to implement or potentially dangerous to staff. Only one L/NNGO director described scenarios where he would not accept an award. No L/NNGO officials described scenarios where they asked for additional budget or longer program timelines. A handful of L/NNGOs with established partner memorandums of understanding with INGOs described joint program design meetings and more collaborative budget planning. These examples were few. In Nigeria, some L/NNGO officials described partnering memorandums of understanding and informal agreements centered on equitable budget support and institutional mentoring. But the agreements were not carried forward under new awards due to the nature of the origin of the funding or the short program design window.

Some L/NNGOs opt out of certain response locations by not bidding on specific calls for proposals. In South Sudan and Nigeria, the ethnic profile of staff and perceptions of the local organization itself can influence which funding opportunity an L/NNGO pursues and how a program is implemented. Some L/NNGOs opted out of potential projects because they lacked the appropriate staffing profile to establish community acceptance and respond safely. Where L/NNGOs chose to respond without the appropriate local network or not having a history of engaging in a specific area, they were said to have placed unnecessary risks on individual staff members and the program faced significant challenges.

Conflict fragmentation in South Sudan, which magnified ethnic tensions, created complex human resources obstacles. Perceived ethnic affiliations of national staff create additional safety and security and operational obstacles. This has also extended to partnering decisions. Some INGO officials noted taking precautions around which L/NNGOs partners implement which programs, and where, and described informal means of verifying ethnic affiliations of specific organizations. However, there do not appear to be any context-specific policies or guidance associated with this partnering challenge. Local actors face similar challenges in northeast Nigeria where local communities are highly insular and suspicious of outsiders. However, interviewees did not note this as a factor in INGO partnering decisions.

POSITIVE PRACTICE

Reviews were mixed in both settings on whether L/NNGOs had preferences for specific international partners (viewed from their perspective as "donors"). INGOs were viewed as providing better cost coverage and greater flexibility. L/NNGOs also described INGOs as more accessible and approachable with greater field presence. Local officials expressed that INGO staff made more regular, lengthy and consistent field visits. Several examples were provided in which INGO staff offered routine technical and operational support during field visits. Such appreciative assessment approaches were favored over other donor approaches that were more focused on financial audits and oversight functions, were randomized as if to catch the partner "off guard", and were not complemented with other supportive activities. INGO-L/NNGO partnerships were also said to benefit from the organizations being similar in nature, which contributed to greater equity and shared ownership. For example, an L/NNGO staff member in Nigeria described a situation where UN staff traveled to a program site by air while instructing the local partner to travel by road. The same staff member noted that INGO staff often used the same mode of transport as the local partner.

"Their lives are worth more than ours," the L/NNGO staff member said referring to UN staff. In contrast, he added, "INGOs are there with us. They supervise with us. They help."

Overwhelmingly, local partners viewed the Nigeria and South Sudan humanitarian funds positively. The flexibility and more realistic costing were said to allow greater autonomy and organizational independence. Many L/NNGOs saw these funds as key factors in their growth and professionalization, particularly around fiduciary controls. Country-based pooled funds have unique characteristics and risk management structures. However, learning from relevant best practice, particularly on program proposal and budgeting processes, may prove helpful in INGOs and L/NNGO partnering.

> "Their lives are worth more than ours," the L/NNGO staff member said referring to UN staff. In contrast, he added, "INGOs are there with us. They supervise with us. They help."

PERCEIVED AND REAL RISKS IN PARTNERING

POOR ACCOUNTING, SUBSIDIZING RISK AND SHORT-TERM FINANCIAL DECISION-MAKING

InterAction's 2016 risk review highlighted that an organization's decision to work with a local partner is heavily influenced by concerns around fiduciary risks to the INGO. These concerns have been amplified with global trends toward increasing audit, compliance, and due diligence requirements and processes. Fiduciary risk begins with the originating donor and passes to all partners across the transaction chain. The over-emphasis on fiduciary risk management was confirmed in all interviews. Yet there was no indication that INGO financial management policies for downstream partners were more rigorous than needed to meet upstream donor expectations.

One of the most challenging issues facing L/NNGOs in conflict-driven emergencies is the sustainable financing of fixed costs.[25] In conjunction with this challenge, L/NNGOs also struggle to accurately forecast the true costs of delivery. Much of this can be explained by limited budgeting expertise. However, L/NNGO staff shared that their budgets were often prescribed by INGO and UN donors rather than developed jointly. Where INGO and UN donors said discussions with partners on budget concerns are encouraged, local officials said they had little leverage or space to address poorly costed programs.

Ambitious program targets paired with conservative and tightly earmarked funds leave little room for adaptation. As a result, many L/NNGOs fill gaps with other donor funds. An L/NNGO program director in Maiduguri described the difficulties.

"The money we are given is not such that we can apply global practice to it. We may not get program support costs for one. Your program doesn't consider that every day you run a generator. You must make unscheduled movements...sometimes we must move what we procure here and then move it again by road. Most drivers don't want to drive those routes, so they hike the prices. Sometimes you must go with two or three vehicles instead of the one you planned for. Our budgets don't take any of this into consideration. You are forced to adjust and be crafty around the budgets to ensure you are meeting the guidelines while still being accountable to the donors. It's impossible."

Partnering decisions are often described through the lens of financial decision-making models and systems, revealing a gap in the management structures dealing with local partnerships. Management processes and systems orient around a single budget, meaning short-term financial considerations have outsized impacts on partnering decisions. Such considerations do not align with longer-term strategic goals around localization. Organizations that had clear strategies and visions for local partnerships, which were few among those interviewed, demonstrated more coherent partnering decisions including realistic budgets, training and ongoing support to the partner. They achieved these even when resources were limited. The returns were noteworthy as L/NNGOs partners often spoke highly of the INGO partner and the humanitarian community knew of the strength and broader benefits of the partnership. As these cases were only evident in South Sudan, it is difficult to determine whether such models are feasible in a rapid scale-up response setting.

UNCONSCIOUS BIAS, FEAR IN PARTNERING DECISIONS AND PRACTICE

Implicit biases affect attitudes and partnering decisions in each context. For example, many INGO, UN and donor officials questioned L/NNGOs' operational independence and believed L/NNGOs to be more susceptible to interference from conflict parties or complicit in surveilling INGO work. Practically, such perceptions inform how, when and what information international aid organizations provide local partners. In turn, this affects L/NNGO risk awareness.

Decision-makers rely on such biases in situations where information is imperfect, uncertainty high, and timeframes constrained. Investments in information gathering and analysis to verify or overcome biases are limited and not systematic. Biases are already standardized in partnering policies and decision-making. INGOs routinely assess prospective partners against their history of funding from UN and other INGOs. According to INGO leadership, this provides an initial and reliable qualification of L/NNGOs capacity. The assessment serves a triage function to narrow a partner candidate pool. Biases were most prevalent when discussing L/NNGO budgets and fiduciary capabilities. UN officials noted repeatedly that local organizations did not require indirect support costs because they had no head offices or they "only want more flexibility to minimize the effects of poor cash flow management." There was also an unsupported assumption that what L/NNGOs lacked in dedicated security budgets and staff they made up for through better context understanding and community connectivity. This was believed to positively impact an L/NNGO's ability to assess and manage security risks, which was then used as a justification to not provide security funding.

Common biases persist among local actors as well. Local officials shared the belief that INGOs have infinite discretionary funds. L/NNGOs directors viewed INGOs with suspicion and believed organizations were willfully denying capacity and financial support because they "wanted to keep the money for themselves." These perceptions created tensions in partnerships. In some cases, it influenced whether the local partner felt comfortable asking for additional support from the INGO partner.

Overall, biases contribute to negative perceptions and infuse partnering with suspicion and mistrust. Mistrust constrains information sharing and

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25   Due to the limitations of the study, InterAction was not able to identify whether the local civil society networks and L/NNGOs were independently exploring options for more sustainable financing.

early warning capabilities. Biases also influence donor "herding". As a result, a small subset of L/NNGOs have become the "partner of choice" for UN and INGO funders. Over-reliance on these informal assessments likely contributes to poor partnering decisions and fuels donor herding toward informally qualified partners and away from partners facing donor accountability or program quality challenges.

Local and international NGO officials in South Sudan shared several cases when L/NNGOs proactively undermined INGO programming or put INGO staff in harm's way. Several separate incidents were shared in which L/NNGOs fostered negative portrayals of INGO performance to donors, incited local communities against INGO field staff resulting in evacua-

tions, and in some instances, physically threatened INGO humanitarian personnel. Many of the incidents shared with the research team were considered a product of the competitive relationship between INGOs and L/NNGOs. In some of these cases, it is difficult to distinguish if such critical events are a product of personal disputes rather than competition. Ultimately, the wariness with which some INGOs approach local partnerships in South Sudan must be viewed in light of the occasional antagonistic and hostile relationship between INGOs and L/NNGOs. While the research team recognizes these cases are likely not the norm, a few severe incidents can have dramatic ramifications for perceptions of the broader local NGO community in country.

Photo courtesy of Mercy Corps

RISK SHARING

The coordination system can help or impede a collective understanding of and response to systemic risks. However, humanitarian coordination policy does little to assess how organizational risk may affect strategic response management. For example, the operational peer review, an interagency assessment tool that is triggered within 90 days of a Level-3 emergency designation (L3), is intended to examine four key areas and guide "immediate and rapid corrective action."[26] None of the four areas consider organizational risks to partners. Neither do humanitarian response plans, though they do provide considerations for humanitarian access conditions and safety and security.

Risks to partners, and the impact those risks could have on collective response management, has not been systematically considered in any recent Nigeria or South Sudan humanitarian response plans. The 2014-2016 Strategic Response Plan for South Sudan forecasts several potential scenarios. Though at the time it was used exclusively to project humanitarian needs, scenario-based planning offered critical information that may have positively contributed to enterprise risk management. No formal discussion on multidimensional risk currently exists within the interagency coordination structures in either context. There is limited joint analysis on how the response management priorities and structures, changing context, and evolving funding and donor requirements affect the different risk categories and risk tolerance. As a result, there is minimal understanding of how risk is distributed and shared across multiple response partners.

RISK SPILLOVER AND DONOR HERDING

Localization in Nigeria and South Sudan may be driving partner consolidation. A relatively small number of Nigerian and South Sudanese L/NNGOs have become the "partner of choice" for funders. South Sudan "preferred partners" consistently secure a large proportion of the South Sudan Humanitarian Fund (SSHF). According to SSHF annual reporting, two organizations often referenced in interviews as INGO and UN "preferred partners" also received the largest share of SSHF funding among the national NGOs. Annual awarded amounts ranged from $1.75 million to $2.88 million from 2014 to 2017. UN OCHA's FTS does not capture the totality of sub-granting, and information to determine the quantity and number of awards a partner has received is limited. Nearly all interviewees raised concerns about partner absorptive capacity, with INGO and UN officials noting "we are all partnering with the same partners."

Considerations of partner absorption capacity and implications for potential future risk remains relatively underdeveloped conceptually in the context of existing risk management frameworks. Due diligence processes

include information collection on a prospective partner's annual budget and the sources of funds. However, the information is only used to validate whether the L/NNGO is an acceptable partner to other donors.

A consolidated local partner portfolio elevates the risk beyond a single relationship. It creates invisible and unplanned shared risks which extend across multiple partners and have no single owner. In the event the risk is realized, it will affect different organizations in different ways and can have widespread implications. A single critical event experienced by a "preferred partner" could have significant implications for that L/NNGO and the awards it implements with other donors. This begs the question: to what extent are more flexible and equitable partnering models subsidizing risk averse policies and practice among other donors?

When L/NNGOs are concerned most with institutional survival, they often accept awards with unfavorable budgets, requirements, and payment conditions. INGO payments were said to be regular and made upfront often in quarterly tranches. However, payment conditions such as "results-based payment" models were said to create unforeseeable financial and operational risks. For organizations with small cash buffers and few outside resources, a delay can render an organization incapable of delivering on programs or force it to draw on other funding streams to offset gaps elsewhere. Delays occur for several reasons including verification of results or lengthy financial audits and investigations. Among such a small and consolidated local partner mix, these delays and the corresponding cash flow pressures may be disproportionately and invisibly affecting programs delivered by the same local organization but funded by different donors. L/NNGOs officials regularly admitted to relying on INGO grants to cope with payment delays from other donors.

"We haven't been paid in five months," one L/NNGO said of one UN funder. "We are chipping resources from other projects to make up for these delays and this puts our accountability to other donors at risk."

Payment delays compromise routine cash flow management. They complicate expenditure tracking across multiple awards and require more precise record-keeping to ensure costs are covered and properly accounted for. Interviews in Nigeria suggest some potential cases where donors likely misconstrued poor cash flow management and bad record-keeping when the organization was attempting to cope with payment delays as fraud. Such events are often shared informally among international humanitarian leadership. This creates a reputational risk, rendering the L/NNGOs suspect. Donors may dismiss the L/NNGO from future grants (i.e. donor herding). This creates financial risk for the

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26   The four key areas that operational peer reviews assess are (1) leadership arrangements; (2) implementation of the other elements of the humanitarian programme cycle, namely coordinated assessments, strategic response planning, resource mobilization, implementation and monitoring; (3) coordination mechanisms; and (4) mechanisms for accountability to affected people. See for example UN OCHA, 2014.

organization and potentially jeopardizes institutional survival. For those that do survive, it can cause them to re-enter the cycle of accepting unfavorable award conditions only to have the same scenario likely to repeat itself again.

L/NNGOs also described situations where donors applied pressure to implement activities before disbursing funding.[27] Incurring program costs before receiving funds creates additional pressure on cash flow and exacerbates the risk of poor accounting as a negative coping mechanism. Reimbursement in arrears (i.e. payment on verification), which is especially challenging in access-constrained and insecure environments, aggravates these risks. One donor's willingness to accept greater fiduciary risks (i.e. flexible funding and upfront payment models) in the interest of sharing risk more equitably with partners, effectively subsidizes another donor's risk averse funding practices.

Relatively brief payment delays can have potentially wide-ranging ramifications, extending beyond the scope of a program to affect other projects. L/NNGOs manage cash flow shortages by suspending staff salary payments, incurring debt with local vendors, rationing or not buying fuel for generators or vehicles, limiting the number of flights moving staff to and from the field (i.e. leaving staff in the field for longer periods of time), and reducing or canceling field per diems. The increased compliance and financial burden and resulting pressures indirectly increase safety and security risks to field staff. The uncertainty and challenging working conditions perpetuate staff turnover as L/NNGO personnel seek more reliable INGO or UN employers. In turn, high staff turnover perpetuates the need for more capacity support which is increasingly viewed as unsustainable and lacking a significant return. These patterns of financial distress facing L/NNGOs in South Sudan and Nigeria are cyclical. INGOs and UN agencies alike must examine the short- and long-term implications payment delays pose to implementing partners and corresponding donors of those same partners, and the effects on field staff and performance.

DELIVERY CHAIN MAPPING

Donor governments demonstrate sensitivity to the operational risks aid organizations shoulder in South Sudan. They have communicated to multilateral and bilateral partners the importance of reporting losses and, at least informally, conveyed to partners that reporting won't result in punitive measures. As a result, donors describe constructive dialogue on diversion risks and loss incidents with tier one partners. UN officials noted increased flexibility and risk thresholds among donors in South Sudan, particularly on pipeline losses. Likewise, INGOs noted positive engagement and information sharing on risk in bilateral donor relationships.

For example, one donor adjusted award parameters to ensure partners can adapt to the evolving security risk and conflict trend by allowing new awards to identify the "place of performance" for a program as countrywide. In the event of an outbreak of conflict or deteriorating security conditions, the partner is able to shift the area of operations without requesting an award modification.

Despite these positive trends, the research team was not able to verify whether flexibility and higher risk tolerance afforded to UN agencies reaches implementing partners. On the contrary, INGOs and L/NNGOs described less flexibility, greater scrutiny, and decreased loss tolerance among UN fund managers. This was reflected in inconsistent policy communication and practices on how to jointly share loss. UN officials interviewed noted that there was greater acceptance of losses of humanitarian pipeline goods, noting that looted goods or those lost under attacks did not have to be repaid. However, both INGOs and L/NNGOs described cases where partners were required to repay pipeline losses under such circumstances.

According to donors, increased loss tolerance for UN agencies is expected to be passed on to partners. Despite donor expectations that risk sharing was passing to sub-awardees, donors interviewed in both contexts said they could "only see" tier one partners and had limited clarity on where or how "pass-through" funds are programmed. The UK Department for International Development (DFID) is a notable exception having recently developed a new Delivery Chain Risk Mapping tool. The tool adopts a more holistic view of risk along the entire humanitarian delivery chain.[28] An origin-to-end approach to risk analysis is a positive development. The tool gives DFID greater visibility on how multilateral contributions are programmed and to whom, and could potentially map how risks change in type, scope, and impact with each transaction. The framework recognizes the critical value of downstream delivery partners, but it remains almost entirely focused on ensuring adherence to DFID's compliance parameters rather than assessing risk *to* partners. It remains to be seen if such frameworks will lead to improvements in partner risk awareness and responsiveness, or simply amount to another reporting requirement.

ZERO TOLERANCE POLICIES, DECREASED TRANSPARENCY, DIMINISHED RISK APPETITE

The rising tide of legal, compliance, and regulatory scrutiny stemming from a proliferation of counter-terror laws and policies now reaches beyond INGO headquarters (HQ) to field operations. As highlighted in InterAction's 2016 risk research, zero tolerance continues to be focused on zero incidences rather than seeking to validate appropriate mitigating

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27   INGOs and other donors could potentially be expecting more of their national NGO partners than they can deliver. This is a strong likelihood in northeast Nigeria given the significant pressure to scale-up the response. While an INGO can respond to donor pressures in advance of the receipt of funds due to the availability of other sources of revenue, L/NNGOs have fewer outside resources.

28   DFID, 2018.

measures and incident responses had been undertaken:

> *Externally, donors have often been unwilling to explicitly acknowledge and accept the likelihood of program losses that may arise in war zones and lawless areas, where humanitarian needs are often greatest. Even when an individual donor representative is attuned to the issues, and offers verbal assurances to an NGO representative that the NGO will not be held liable for losses occurring after all appropriate mitigating measures have been taken, the (well-founded) fear remains that these assurances will have no standing with auditors or inspectors general down the line.*[29]

This trend acts as a form of risk transfer. It originates with the donor and passes to the prime award recipient, and then can pass again to local organizations.

Zero tolerance award clauses and the recent wave of investigations and audits show that regulators are holding aid organizations responsible for their own actions and those of their vendors and sub-awardees. The integration of the Lake Chad Basin clause into US humanitarian awards without notification or guidance echoes recent experiences in northwest Syria.[30] Diverse interpretations from organizations familiar with the clause suggest potential variances in the language across awards. They also point to no common understanding of the clause's intent or the means to comply with it.

Stronger regulatory requirements may address donors' legal, financial, and reputational risks, but they confer significant risks to partners already facing challenges to provide assurances. Practically, compliance translates to additional collection of often-sensitive information by field staff, much of which comes with significant safety, security, and reputational risks in host communities. Many INGO and UN aid officials had visceral responses to the clause, noting that it was a "complete abdication of moral responsibility" and that it contravenes both principled interventions and conflict-sensitive programming approaches. Other officials could not imagine how to feasibly comply without exposing field staff and affected people to inordinate risk.

"I would never put my staff at risk by having them write an email in which they noted someone was associated with terrorism," a senior INGO official said.

It is debatable how this additional information reduces risk for donors. The increased costs for and security risks to implementers is clear. Information collection or assurances also have costs for populations in need, who are the ultimate risk bearers in the form of delayed services. Additional information collection required from beneficiaries confers added protection risks to affected people themselves. Generally, aid officials

believed verification and enforcement of the new requirement to be impossible and unworkable in any practical sense. To ensure the impartiality of the response, aid organizations do not request information related to affected people's group or political affiliations. Officials believed that if the information does not exist, the policy cannot be enforced. However, experiences in Turkey and most recently, Syria, are evidence that an organization's inability to identify risks facing aid operations does not eliminate or mitigate liability.[31] As one senior leader noted, "Ignorance is not a defense."

The field research did not include a comprehensive review of award language or donor counter-terrorism requirements in northeast Nigeria. However, interviews showed that the new award requirements have no defined standards, processes for compliance, or consequences for non-compliance. Unclear guidelines create uncertainties, lead to varying interpretations and applications, and complicate the prioritization of risk management initiatives. Despite growing concern with the new requirements, joint efforts to compare award language, develop a common understanding of compliance, and assess the potential implications had not yet been made at the time of the field research. Some INGO officials could not confirm when asked how HQ legal and compliance teams were responding. At the time, most organizations had already begun integrating the clause into their partnership contracts, training, and onboarding.

Regulatory pressures create challenges for due diligence in partnering decisions. To date, these processes have over-emphasized assessments of a partner's fiduciary capabilities. But the award language in Nigeria, and similar developments in other high-risk settings such as Syria, suggest regulatory oversight is broadening to include the end-user of humanitarian assistance. For example, the Lake Chad Basin clause and recent USAID/OFDA proposal guidelines on risk mitigation for high-risk environments point to the adoption of a broader view of risks related to aid diversion. This would include the risk that aid distributed to a beneficiary results in an indirect benefit to designated terrorist groups or their affiliates.[32] Though there is not yet concrete evidence in Nigeria or South Sudan, aid organizations should anticipate that regulators and oversight bodies will expect INGOs to provide more robust information about local partners, their activities and services, and how they interact with beneficiaries. Current risk management structures and systems are not fit for such analysis as they are largely inward-facing and do not allow for continuous monitoring of potential "third-party" risks.

Donors should understand the negative impacts of zero tolerance approaches. Overwhelmingly, interviews revealed that such approaches, especially in scale-up operational settings where access conditions are complex, are likely to reduce information sharing. The outcome is reduced risk awareness and responsiveness, uncertainty, and a diminished risk appetite particularly in reaching new areas, adopting a more

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29   Stoddard & Czwarno, 2016.

30   See for example "Lake Chad Basin" award clause language in the earlier section, International Legal and Regulatory Scrutiny.

31   See for example Parker, 2018.

32   USAID, 2018.

static presence, or developing innovative programs. Among donors, there appears to be little recognition that compliance-driven approaches to risk management are increasing the time needed to obtain funding and to respond. Ultimately, this likely translates to more risk aversion in programming and priority setting among operational organizations. Though respondents did not note it, risk averse donor requirements like the Lake Chad Basin clause may also contribute to decreased use of remote management and partnership arrangements in the long term. These results will reduce coverage of humanitarian needs. Though the Lake Chad Basin clause complicates a productive and transparent interagency conversation on risk, aid organizations should endeavor to counter these negative effects and foster internal and interagency dialogues wherever possible.

OPERATING CONTEXT CONNECTIVITY AND HQ COMPLIANCE DEPARTMENTS

In the context of the new award language noted above but also more broadly, there appears to be limited connectivity between country teams and HQ legal and compliance departments. For example, few country teams were able to say whether HQ legal counsels were aware of the award language or whether it had been elevated with the donor. This raises a question as to whether global compliance units – which INGOs

have established in HQ and regional offices – are connected and responsive to context-specific trends.

Poor, or not yet fully realized, integration between HQ compliance units and country offices may be a symptom of several hurdles. First, INGO governance is traditionally decentralized with most major risk decisions and management residing in the senior management team. Responsibility typically rests with the country director. The model is useful in providing a clear owner for risk decisions, but it may mean that specific incidents that illuminate global trends or potentially signal upcoming risks in other similar contexts may not gain visibility or traction within global risk management structures. Increased adoption and use of global risk registers should counteract this. Second, the broad lack of awareness on the HQ response to the award language and the fact that country directors agreed to the language at country level suggest INGOs' enterprise risk management frameworks do not necessarily support the escalation of critical events to global levels. For example, some risk decisions should naturally exceed the decision-making limits of an in-country governance structure, particularly if such decisions can be precedent setting for other contexts. With global trends pointing towards increased and converging regulatory risks – from donors and host governments – the risk of setting harmful and negative precedents is now ever greater.

CONCLUSIONS AND RECOMMENDATIONS

Findings and observations from the field research were integrated into the *NGOs and Risk: Managing Uncertainty in Local-International Partnerships Global Report*. The findings from these case studies point to a series of inadvertent and counterproductive consequences, with risks being passed down the delivery chain from donor to INGO to L/NNGO partners. The tensions and perverse outcomes detailed above are reflected in the global report.

Concurrently, the case studies and the global report point to many examples of good practice and promising developments indicating goodwill and willingness to improve on the current state of partnerships for the shared benefit of both partners and the communities they serve. The good practice and recommendations derived from this research are primarily directed at INGOs, and they are outlined in the global report.

REFERENCES

Al Jazeera. (2018, March 2). Suspected Boko Haram Attack Kills Aid Workers in Nigeria. *Al Jazeera News*. Retrieved from https://www.aljazeera.com/news/2018/03/suspected-boko-haram-attack-kills-aid-workers-nigeria-180302094014260.html

Atabo, A. (2018, January 11). Analysis: Fighting Corruption in IDPs' Camps. *Leadership*. Retrieved from https://leadership.ng/2018/01/11/fighting-corruption-idps-camps

Department for International Development. (2018). DFID Supply Partner Code of Conduct. Retrieved from https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733511/DFID-Supply-Partner-Code-Appendix-B2.pdf

Humanitarian Outcomes. (2016). *Aid Worker Security Report* 2016.

InterAction. (2018). F*indings and Recommendations. InterAction Protection Mission – Northeast Nigeria.* Retrieved from https://www.interaction.org/document/interaction-protection-mission-%E2%80%93-northeast-nigeria

Ministry of Justice. (2017). Laws of South Sudan. *Labour Act*, 2017. Act No. 64. Retrieved from http://docs.southsudanngoforum.org/sites/default/files/2018-01/Labour Act 2017.pdf

Norwegian Refugee Council. (2018). *Principles under Pressure*. Retrieved from https://www.nrc.no/globalassets/pdf/reports/principles-under-pressure/1nrc-principles_under_pressure-report-screen.pdf

Pantuliano, S., Mackintosh, K. & Elhawary, S. (2011). *Counter-Terrorism and Humanitarian Action: Tensions, Impact and Ways Forward*. p. 43. Overseas Development Institute Humanitarian Practice Network Policy Brief 43. Retrieved from https://www.odi.org/sites/odi.org.uk/files/odi-assets/publications-opinion-files/7347.pdf

Parker, B. (2018, October 2). US and UK Halt Key Syria Aid Shipments over Extremist 'Taxes.' *IRIN*. Retrieved from https://www.irinnews.org/news/2018/10/02/us-and-uk-halt-key-syria-aid-shipments-over-extremist-taxes

Sawab, I. (2017, February 17). How 126 NGOs Make Life Easy, Difficult in Maiduguri. *Daily Trust*. Retrieved from https://www.dailytrust.com.ng/how-126-ngos-make-life-easy-difficult-in-maiduguri.html

Sawab, I. (2016, March 16). Shettima Investigates NGOs Operating in Borno. *Daily Trust*. Retrieved from https://www.dailytrust.com.ng/shettima-investigates-ngos-operating-in-borno.html Stoddard, A., & Czwarno, M. (2016). Residual Risk Acceptance: An Advocacy Guidance Note. Retrieved from https://www.interaction.org/document/residual-risk-acceptance-advocacy-guidance-note

Stoddard, A., & Czwarno, M. (2016). *Residual Risk Acceptance: An Advocacy Guidance Note*. Retrieved from https://www.interaction.org/document/residual-risk-acceptance-advocacy-guidance-note

Stoddard, A. & Jillani, S. with Caccavale, J., Cooke, P. & Klimentov, V. (2016). The Effects of Insecurity on Humanitarian Coverage. (Report from the Secure Access in Volatile Environments (SAVE) research programme). Humanitarian Outcomes. pp. 1-58. Retrieved from http://www.gppi.net/fileadmin/user_upload/media/pub/2016/SAVE__2016__The_effects_of_insecurity_on_humanitarian_coverage.pdf

UN OCHA. (2014). *Operational Peer Review Guidance Terms of Reference Review.*

UN OCHA. (2016). *Nigeria 2016* (*Humanitarian Response Plan*). UN OCHA Financial Tracking Service. Retrieved from https://fts.unocha.org/appeals/496/summary

UN OCHA. (2017a). *2018 Humanitarian Needs Overview - South Sudan.*

UN OCHA. (2017b). *Nigeria 2017: Trends in Response Plan/Appeal Requirements.*

UN OCHA. (2017c). *Nigeria Humanitarian Response Plan 2018*. p. 76.

UN OCHA. (2018a). *Nigeria: Borno - Ongoing Humanitarian Activities Overview*. Retrieved from https://www.humanitarianresponse.info/en/operations/nigeria/infographic/nigeria-borno-humanitarian-activities-overview-june-2018

UN OCHA. (2018b). *Nigeria 2017* (*Humanitarian Response Plan*). UN OCHA Financial Tracking Service. Retrieved from https://fts.unocha.org/appeals/536/flows

UN OCHA. (2018c). *Northeast Nigeria Humanitarian Situation Update.*

UN OCHA. (2018d). *South Sudan Humanitarian Fund: Annual Report 2017*. Retrieved from https://reliefweb.int/sites/reliefweb.int/files/resources/South Sudan HF - Annual Report 2017.pdf

UN OCHA. (2018e). *South Sudan Trends in Reported Funding.*

USAID. (2018). USAID/OFDA *Proposal Guidelines: Risk Mitigation for High-Risk Environments*. Retrieved from https://www.usaid.gov/sites/default/files/documents/1866/USAID-OFDA_Proposal_Guidelines_May_2018.pdf

U.S. Department of the Treasury. South Sudan Related Designations. Retrieved from https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20170906.aspx