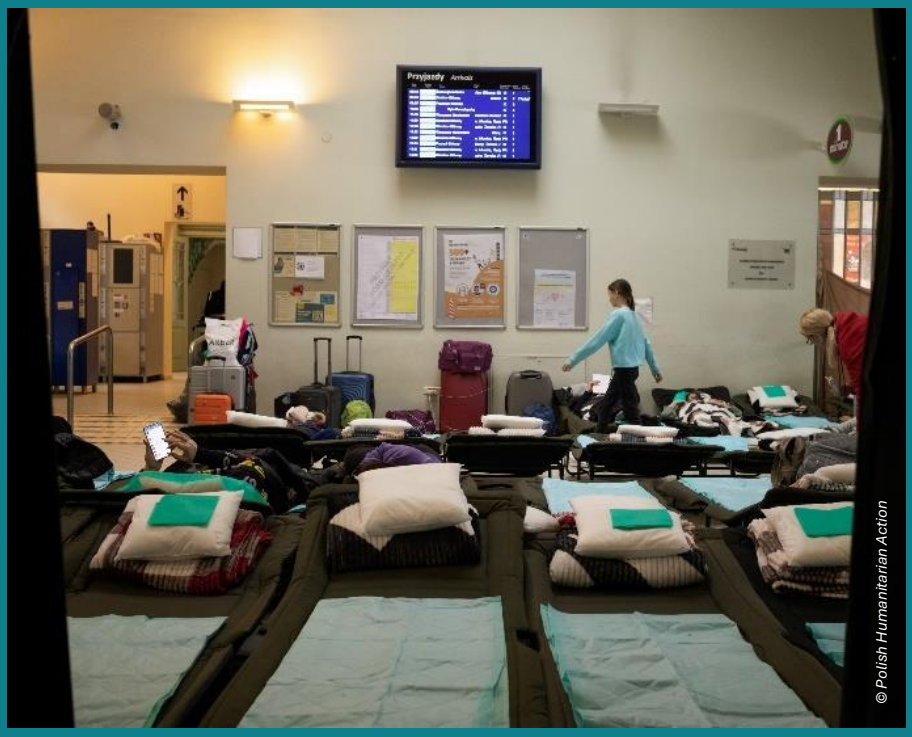
GRAND BARGAIN LOCALIZATION COMMITMENTS (POLAND CASE STUDY)

JUNE 2024



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GROUPE URD

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The publication of the Grand Bargain Localization Commitments (Poland Case Study) has been made possible by many organizations and committed individuals, whose contributions we want to recognize.

This study is a direct result of the cooperation within the Partnership Working Group, which is part of the NGO Forum "Razem". The NGO Forum "Razem" provides a space for multilateral cooperation for non-profit organizations active in the fields of migration and integration in Poland. It was established in response to the escalation of the war in Ukraine in 2022 in order to support the civil society actors responding to the humanitarian refugee crisis. The Partnership Working Group was called for a year later in response to the Open Letter to International Donors And Organizations That Want To Help Ukrainian Refugees In Poland, published by the Polish L/NNGOs in October 2022, and in response to the broader discussions surrounding the challenges to implementing the localization agenda in Poland. The Working Group developed and promoted **The Voluntary Guidelines on the Nature of Contractual Partnerships**, which reflect the experience from Poland and offer recommendations to tackle the challenges encountered. We want to express our gratitude to all who were engaged in this process which contributed to the development of the Grand Bargain Localization Commitments (Poland Case Study), to which the Partnership Working Group served as a Reference Group.

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List of acronyms[1]

BDKS	Sectoral Commission for Social Dialogue on Migrants and Refugees (in the Municipality of Warsaw)
CSO	Civil Society Organization
EU	European Union
EU AMIF	EU Asylum, Migration and Integration Fund
EUR	Euros
FRD	Fundacja Rozwoju Dzieci
GDPR	General Data Protection Regulation
INGO	International Non-Governmental Organization
IOM	International Organization for Migration
KPI	Key Performance Indicator
L/NA	Local and/or National Actor
L/NNGO	Local and/or National Non-Governmental Organization
LNGO	Local Non-Governmental Organization
LGBTQ+	Lesbian, Gay, Bisexual, Transgender, Queer and other marginalized sexualities and gender identities
NGO	Non-Governmental Organization
PAH	Polish Humanitarian Action
PCPM	Fundacja Polskie Centrum Pomocy Międzynarodowej (Polish Center for International Aid Foundation)
PiS	Prawo i Sprawiedliwość / Law and Justice (political party)
PLN	Polish Zloty
PSEA	Protection from Sexual Exploitation and Abuse
RCF	Refugee Coordination Forums
RCM	Refugee Coordination Model
RLO	Refugee-led Organization
SGBV	Sexual and Gender-Based Violence
ToR	Terms of Reference
ULO	Ukrainian-led Organization
UN	United Nations
UNDP	United Nations Development Program
UNHCR	United Nations High Commissioner for Refugees
UNICEF	The United Nations International Children's Emergency Fund
WHO	World Health Organization
WOŚP	Wielka Orkiestra Świątecznej Pomocy

[1] *This list of acronyms has been corrected on the 17/07/24*

1. EXECUTIVE SUMMARY

Within the first month of Russia's full-scale invasion of Ukraine on 24 February 2022, over two million refugees crossed into Poland[2]. Many continued to other European countries or overseas, but a year later, over a million refugees from Ukraine were registered for Temporary Protection in Poland[3]. In 2024, refugees are still arriving in Poland from Ukraine, and the number of registered refugees remains similar to the previous year[4].This report evaluates the involvement of international humanitarian actors in response to the challenges related to this forced migration movement, as compared against the Grand Bargain Localization Commitments[5]. Its aim is to support the common work on better relationships between international actors, such as INGOs and UN agencies, and their local partners in Poland, as well as to contribute to the global localization debate.

The report focuses on INGOs and UN localization agendas, these organizations' relationships with L/NNGOs, and the latter's expectations and experiences related to building partnerships with international actors. The study does not cover questions related to localization involving local governments or public institutions.

The research employs the NEAR Localisation Performance Measurement Framework[6] but also draws directly on analytical categories from the research material, i.e., on how the research participants understood the localization dynamics. In terms of data collection methods, the research relies on individual interviews, focus group discussions, analysis of partnership agreements, and participant observation of coordination meetings. The data were collected between March and May 2024. It provides information on the NGO landscape before the 24th of February 2022 and the development of the response up to the beginning of May 2024. In total, 85 persons from 55 organizations took part in the research and 6 INGOs shared their partnership agreement templates for our analysis.

The situation analysis identifies traits of the Polish NGO world which are likely to have impacted the later localization process. These traits include efficiency in the field and the high level of ideological autonomy in the L/NNGOs, combined with their long-term underfunding. The report discusses the coping strategies of L/NNGOs that simultaneously face financial instability and government policies aimed at shrinking the civic space. In the case of many of the local actors,

[2] Statistics available at: https://www.strazgraniczna.pl/pl/granica/statystyki-sg/2206,Statystyki-SG.html (accessed on 06.06.2024).
[3] According to official government data on persons with temporary protection status: Obywatele Ukrainy w Polsce – aktualne dane migracyjne, 24.02.2023, https://www.gov.pl/web/udsc/obywatele-ukrainy-w-polsce--aktualne-dane-migracyjne2 (accessed on 02.06.2024).
[4] Eurostat data, https://ec.europa.eu/eurostat/databrowser/view/MIGR_ASYTPSM__custom_7394287/default/table?lang=en%20%5Ct%20_blank (accessed on 02.06.2024).
[5] For more information about the Grand Bargain, see: https://interagencystandingcommittee.org/grand-bargain (accessed on 02.06.2024)
[6] Network for Empowered Aid Response, https://www.near.ngo/lpmf (accessed on 02.06.2024).

funding was provided outside of partnership frameworks. L/NNGOs also had a tendency to base organizational capacity on individuals' high commitment levels and readiness to put the good cause before their own well-being. These local actors' characteristics resulted in high-quality fieldwork but also a tendency to overcommit and a high incidence of burnout.

The analysis of partnership agreements was conducted using the criteria of completeness, clarity, equity, availability in local languages and consequences for workload. The documents included in the analysis were strongest in terms of the first two criteria: as a rule, they were comprehensive and precise. The main areas for improvement were identified as equity (the sections on terms of termination and regulating disputes often aligned more with the international actors' interests), and availability in the main response languages (Polish and Ukrainian). Reporting and monitoring requirements differed greatly between INGOs, and more alignment in that regard would likely facilitate better cooperation between NGOs. Nonetheless, it should be stressed that good practices in contracting can already be found in the research material, thus showing that INGOs can learn from one another.

Evaluation of the response dynamics against the Grand Bargain Commitments (as operationalized by the NEAR framework) showed overall positive results. Adherence to the commitments was highest with regard to financing: in the case of Poland, the main strengths of the localization processes were the high availability of direct funding, the high share of overhead costs covered by INGOs, and the good availability of financial support for organizational development. Capacity sharing and the quality of partnerships are areas where improvement was expected by all the actors involved. Capacity development often focused on facilitating local actors' adaptation to the humanitarian system and rarely assumed the character of capacity sharing. Excessive formalization of partnerships after the emergency phase of the response, often combined with inconsistencies related to these formal requirements, meant office work overshadowed matters related to field challenges and impacted the quality of partnerships. The table below provides a detailed overview of the results.

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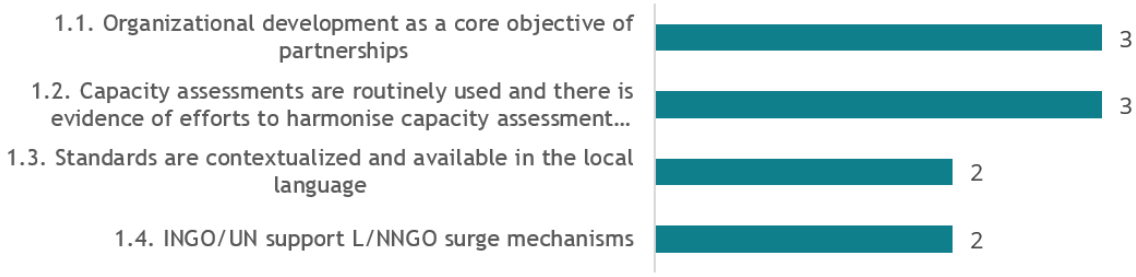
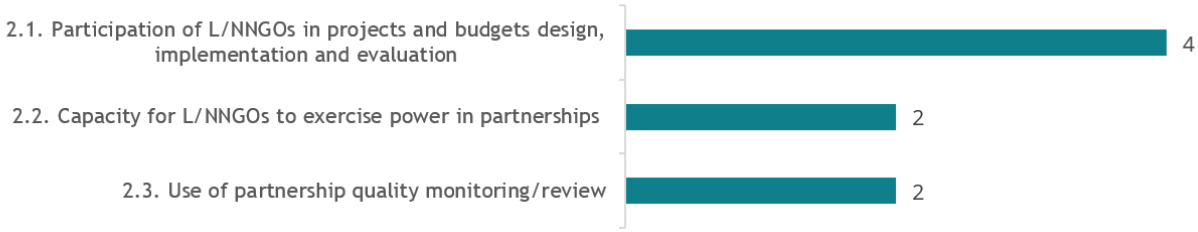
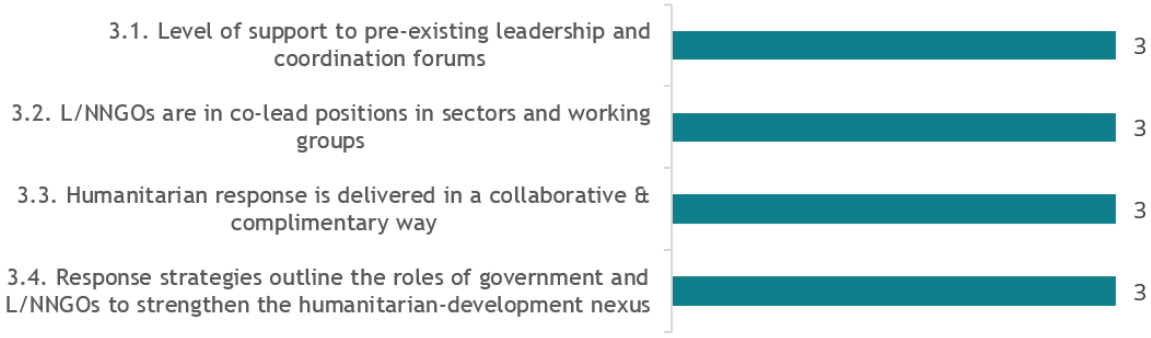
1. Level of achievement of Core Commitment 2.1: Increase and support multi-year investments in the institutional capacities of local and national responders, including preparedness, response and coordination.

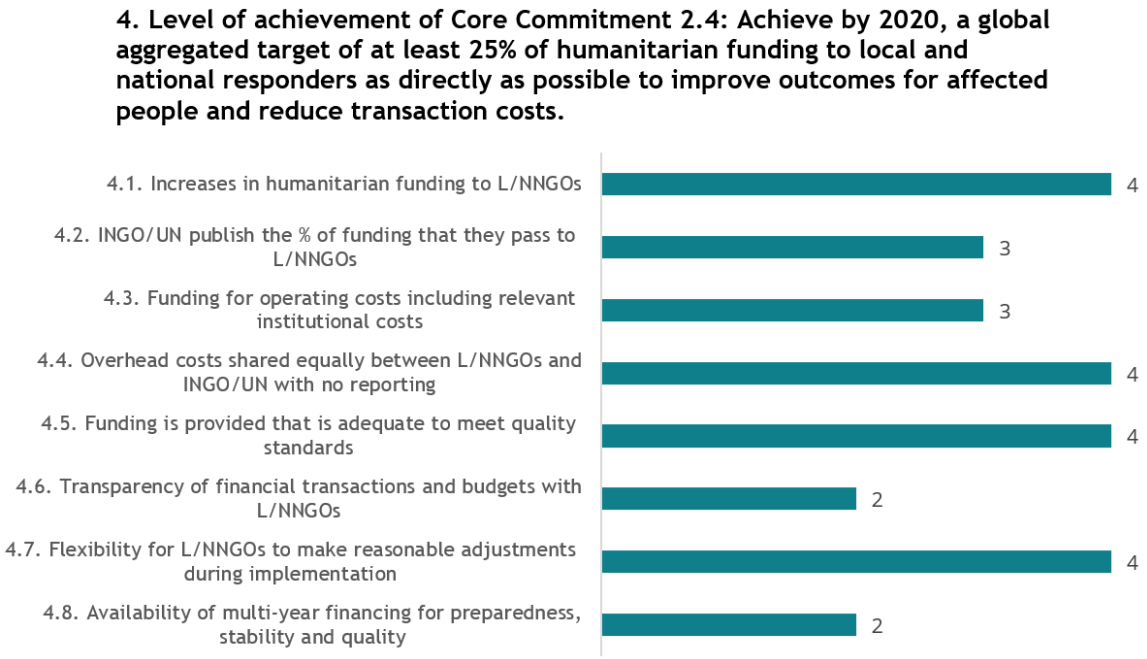


2. Level of achievement of Core Commitment 2.2: Understand better and work to remove or reduce the barriers that prevent organizations and donors from partnering with local and national responders in order to lessen their administrative burden.



3. Level of achievement of Core Commitment 2.3: Support and complement national coordination mechanisms where they exist and include national and local responders in international coordination mechanisms as appropriate and in-keeping with humanitarian principles.





The report identifies 13 barriers and 10 enablers of localization in Poland. The barriers include proximity bias in identification of projects' participants and their needs; decontextualized character of humanitarian models, standards and commitments; no shared definition of success between local and international actors; excessive administrative burden on local actors; insufficient awareness raising about the key characteristics of the humanitarian cycle among L/NNGOs; high rotation of INGO and UN employees and language barriers. The enablers include abundant direct funding available, including funding covering overhead costs and organizational development; availability of non-competitive funding; reliability of L/NNGOs as partners; horizontal networks facilitating cooperation between organizations sharing interests and facing similar challenges; local actors with adequate experience assuming the role of intermediaries (e.g., engaging in re-granting or facilitating coordination); high social legitimacy of providing support to Ukrainian refugees; authentic work on improving partnerships; acknowledgment of local expertise and capacity. We stress that localization is largely a matter of balance: some of the enablers, when applied without monitoring or on too wide a scale, can become barriers.

The report proposes a long list of recommendations, several of which deserve highlighting in this summary. **Strengthening networks of cooperation**, i.e., horizontal networks between local actors and similar cooperation ties between international actors, has been instrumental in overcoming some of the localization barriers and is worth considering at other sites of humanitarian intervention. **Capacity sharing instead of capacity building** to acknowledge and properly employ the expertise of local actors is recommended in any context. **Ensuring more**

equity in contracting, especially with regard to prioritizing the local law as the governing law and in terms of termination is recommended, especially for contexts where the rule of law is sufficient to ensure both sides a fair trial. **Ensuring availability of contracts in the local language** is recommended as general good practice. The report also concludes that **reconnecting with social movements** is beneficial to international humanitarian actors wherever these movements address questions at the heart of humanitarian ethics, such as human rights, civil participation or protection from violence.

2. INTRODUCTION

It has been over two years since Poland emerged as one of the main sites of the international humanitarian response to the Russian invasion of Ukraine on 24th of February 2022. Cooperation between professional international humanitarian actors and a variety of local actors has supported the availability of vast levels of aid for refugees and facilitated the organizational development of both types of actors.

But this interaction between international and local actors has not been without its difficulties, as the many participants in this research study have told us. In the interests of learning and transparency, they have decided to document this experience as well as its successes and difficulties. These discussions focus on whether the efforts align with the expectations of local and national non-governmental organizations (L/NNGOs) and civil society organizations (CSOs), as well as the perspectives of donors, UN agencies, and international non-governmental organizations (INGOs).

This discourse contributes to a broader dialogue on the localization of humanitarian aid, a concept that has gained prominence since the 2016 World Humanitarian Summit in Istanbul. Localization is now a crucial component of the mainstream humanitarian reform agenda, alongside the concept of "quality funding," identified as an enabling priority in the Grand Bargain 2.0 Framework[7]. While there has been notable progress, significant barriers have been identified, thus highlighting the need for improved tracking mechanisms and the increased participatory engagement of local actors.

The primary objective of this research is, as the Terms of Reference specify, “to analyze and inform how international humanitarian support in Poland is being implemented by L/NNGOs and CSOs in relation to the Grand Bargain Localization Commitments", in order to:

- improve relationships between international actors (INGOs and UN agencies) and L/NNGOs and CSOs in Poland (lessons to be learnt from both actors).
- share lessons learnt in Poland to further support the implementation of the localization agenda at the global level.

[7] *The Grand Bargain 2.0: Endorsed Framework and Annexes*, Inter Agency, June 2021, (EN) Grand Bargain 2.0 Framework.pdf (interagencystandingcommittee.org) (accessed on 02.06.2024).

3. METHODS AND LIMITATIONS

3.1. DEFINITIONS AND SCOPE OF THE RESEARCH

We follow the OECD definition of localization as "a process of recognizing, respecting and strengthening the leadership by local authorities and the capacity of local civil society in humanitarian action, in order to better address the needs of affected populations and to prepare national actors for future humanitarian responses".[8]

The main focus of the research is the degree to which the capacity of local civil society in humanitarian action has been recognized, respected and strengthened since the beginning of the full-scale invasion of Ukraine and the movement of millions of refugees to Poland and beyond. The degree to which the leadership of local authorities has been recognized, respected and strengthened is not at the core of our study, but some findings relate to it.

In our research, local civil society includes more or less formalized groups, from informal citizen-led initiatives created during the emergency phase to older established organizations. Organizations of various sizes and levels of professionalization participated in the research. Some of them had prior experience in the migration sector, while others were new players in the field. International actors include actors originating from various cultural, historical and institutional contexts, including international non-governmental organizations, humanitarian networks such as the Red Cross Movement or Caritas, and the UN agencies present in Poland. These international actors are understood as representatives of their regional and global entities and are linked/tied to their mandates, constituencies, and donors.

Measuring the implementation of the localization agenda implies unpacking its various dimensions. The research team built on the NEAR localization framework to identify and measure the following 4 components of the process: (1) partnership, (2) funding, (3) capacity, (4) coordination and complementarity. The two additional components of the NEAR framework are (5) policy, influence and visibility and (6) participation. Although these were not used as part of the analytical framework for time reasons, some of our findings relate to them.

The research scope includes profiling of the actors that entered into the response process in February 2022, analysis of the evolution of the relationships between international and local actors over the 2.5 years of the humanitarian response, and assessment of the implementation of the localization agenda.

[8] Cyprien Fabre, *Localizing the response: World Humanitarian Summit: Putting Policy into Practice*, The Commitments into Action Series, OECD 2017, https://www.oecd.org/development/humanitarian-donors/docs/Localisingtheresponse.pdf (accessed on 06.06.2024) .

3.2. RELEVANT RESEARCH

Local and international organizations involved in the Ukrainian response have been the main source of information on their own activities and have offered critical insight. Because there is so much expertise on the topic available, both insider expertise and that of outsiders (supervised or co-created by insiders), this has become a valuable resource of information for this study.

A number of observations formulated in previous studies, especially *The Polish School of Assistance*[9] and *Where We Are Now*[10], have been restated here, sometimes with slight modifications.

- Most of the available studies stress the **immense contribution of civil society to the response** in its emergency phase. The scale of mobilization and the swiftness of the grassroots reaction, including the response by Ukrainian-led organizations and informal initiatives, are stressed in nearly all the reports we came across. Additionally, the course of the first phase of the response is presented as an argument for an ambitious and equitable localization agenda[11]. At the same time, reports elaborated by local teams raise the question of exits and more strongly stress the limited involvement of central government in the response. These reports point to the risk (and fact) of overburdening local governments and civil society actors with long-term challenges related to the reception of refugees without providing them with adequate financial or institutional support, or a policy framework[12]. These observations are simply restated in this report as they are fully supported by our research material.
- With regard to profiling local actors, some of the previous research points to a difference in the response between **"old actors"** (involved in supporting migrants and refugees before the 24th of February) and **"new actors"** (those who started operating in this field or launched operations after this date)[13]. This distinction was hardly used by the participants of this study. It is likely that in the third year of the response and in discussions over relationships between the local and international actors, the distinction has lost some of its earlier significance. Some of the "old" established actors also stressed in their narratives that there is much that is new to them in the response. Being "old" or "young" seems to have impacted the localization dynamics less than factors

[9] Sarian Jarosz & Witold Klaus (eds.), *The Polish School of Assistance: Reception and Integration of Refugees from Ukraine in Poland*, Migration Consortium, Centre of Migration Research, University of Warsaw, Centre for Migration Studies, Adam Mickiewicz University, Warsaw 2023.
[10] Sarian Jarosz, *Where We Are Now: Social organizations in Poland and humanitarian crises in 2021-2023: Good Granting and Cooperation Practices*, Migration Consortium, Warsaw 2024.
[11] *The Ukraine Crisis: Adapting to an Evolving Crisis through Partnerships*, Oxfam International 2024, https://oxfam.se/wp-content/uploads/2024/02/RS367626_The-Ukraine-crisis_-Adapting-to-an-evolving-crisis-through-partnerships.pdf (accessed on 02.06.2022);LSE Department of International Development, *Transformational Humanitarian Response: The Example of Poland*, Humanitarian Leadership Academy and Save the Children, https://www.humanitarianleadershipacademy.org/wp-content/uploads/2023/05/Transformational-Humanitarian-Response-The-Example-of-Poland.pdf (accessed on 02.06.2022)/
[12] *The Polish School of Assistance*, 81-88; *Where We Are Now*, 14, 25; *Transformational Humanitarian Response: The Example of Poland*, 29–30.
[13] *Where We Are Now*, 9.

such as general experience in managing an organization, prior experience with humanitarian funding, or even the geographical location of an organization.

- **Scaling-up challenges** have been highlighted in several reports, including challenges related to hiring (voiced mainly by international actors)[14] and access to stable funding to make it possible to maintain the required level of growth (underlined by local organizations)[15].
- Our observations are also largely consistent with previous criticism related to **coordination**, including insufficient coordination in the first months of the response[16].
- **The Polish-Belarusian border crisis** has been highlighted as an important context for the Ukrainian response, as the civil society response provided models of cooperation and resources for the later Ukrainian response[17]. At the same time, the different scale and dynamics of civil society mobilization at the two borders shows that the centrality of racism to the response is problematic.
- **Burnout and fatigue of staff in local organizations** has been identified as a key challenge, not only for the Ukrainian response but also for the future of local actors[18]. These concerns have been largely confirmed by this study. At the same time, our insights into the topic are limited by the positionality of its participants: we talked mainly to persons in management positions, and the fatigue and burnout scenarios they described were strongly related to these positions. No burnout example was related to frontline aid work.

In the report, we also refer to other sources, including reports by civil society or humanitarian organizations, localization studies prepared in other contexts, as well as some academic literature[19]. However, the reports cited above constitute a reliable source and, in the absence of a baseline localization study[20], the main point of reference for this research.

[14] Adrienn Kiss, *Mapping and Rapid Assessment of Existing National NGO Coordination Mechanisms Focusing on Hungary, Poland, Romania, and the Republic of Moldova, UNHCR & ICVA* 2022, https://www.icvanetwork.org/uploads/2022/12/Mapping-and-Rapid-Assessment-of-existing-NNGO-Coordination-Mechanisms.pdf (accessed on 06.06.2024).
[15] *Where we are now*, 15-19.
[16] *The Polish School of Assistance*, 6, 34-40.
[17] *The Polish School of Assistance*, 9; *Where We Are Now*, 11; *Poland Country Assessment: Safeguarding Support for Ukrainian Refugees*, Resource and Support Hub, Eastern Europe March 2023, https://easterneurope.safeguardingsupporthub.org/documents/poland-country-assessment-safeguarding-support-ukrainian-refugees (accessed on 06.06.2024), 3.
[18] *Where We Are Now*, 16; *Transformational Humanitarian Response*, 6.
[19] All these materials are included in the footnotes and reference list.
[20] An example of a localization baseline study facilitating tracking localization development:, *Humanitarian Localization Baseline for Ukraine*, Humanitarian Advisory Group, International Council of Voluntary Agencies, NGO Resource Center and Info Sapiens, https://humanitarianadvisorygroup.org/insight/a-humanitarian-localization-baseline-for-ukraine/ (accessed on 02.06.2024).

3.3. INFORMATION SOURCES AND COLLECTION

The study relies on a mix of empirical methods: individual interviews, focus group discussions, analysis of regulatory documents, and participant observation meetings. These methods allow for data triangulation. They are additionally complemented by references to gray literature we came across during our research.

Content analysis of Partnership Agreements between INGOs and LNGOs based on documents submitted by INGOs (6 organizations).

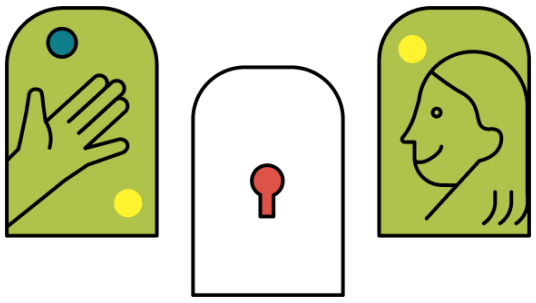
Gray literature and other documents, such as coordination meeting minutes, available financial data, donor policy documents and funding guidelines, etc.

Participant observation of 2 inter-organizational coordination meetings.

Individual interviews or small group interviews[21] with representatives of 52 localization stakeholders focused on the quality of partnerships and each organization's localization agenda and experiences.

Additional interviews that covered specific questions that emerged during the research:

- 3 individual interviews on coordination mechanisms. These interviews with persons involved in the creation or leadership of coordination groups and mechanisms complemented the bilateral interviews by providing an interorganizational perspective.
- 1 focus group with Ukrainian-led organizations, gathering 10 participants from 5 organizations who provided insight into the specific position and experiences of this category of local actors.
- 5 interviews on compliance and passporting with representatives of 3 INGOs that facilitated learning more about these organizations' efforts to lessen the administrative burdens on local actors.



[21] Up to 3 persons.

Breakdown of research participants

Category	Number
UN agency	3
INGO	12
L/NNGO, including[22]: - Roma-led - Ukrainian-led - Polish humanitarian - WR and LGBT+ - Launched in 2022 or later - Organizations specialized in distributing funds - Community-led or informal initiative - Organizations working with persons with disabilities	40 2 12 3 3 5 3 1 2
Total number of unique organizations participating in the study	**55**
Total number of unique research participants	**85**

In total, 85 persons were interviewed individually or in groups to gather evidence about the implementation of the localization agenda in Poland. The aim was to highlight the barriers and enablers for localization in this context and formulate practical recommendations for international and local actors.

We strived to conduct interviews in the **preferred language of research participants**. Eventually, all conversations were held in Ukrainian, Polish or English. In one case, we were not able to ensure the interview was held in the preferred language of the research participant. Their second choice was English, which became the language spoken in the meeting.

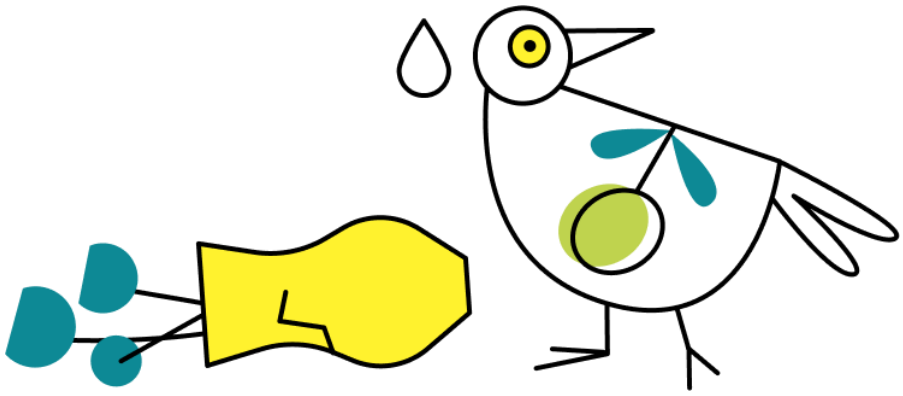
All interviews were qualitative but followed a specific list of questions to be covered. Initially, the study was planned as partly quantitative, but the pilot interviews showed that the participants preferred natural conversation to standardized questionnaires as their observations did not always fit into the predefined lists of answers.

[22] The categories below can overlap (e.g., some of the Ukrainian-led organizations were launched in 2022 or later) and do not exhaust the research sample (organizations that do not fall into either category have also been included in the sample. However, the list shows what kind of diversity factors we have taken into account in our sampling.

Regardless of the data-collection method or technique, our sampling was largely dependent on the willingness of the invitees to take part in the research. In the case of INGOs, their willingness was clear and only one organization declined or failed to respond to our invitation. In the case of UN agencies, three out of five replied to our invitation and decided to participate. The positive reaction to the study can be partly attributed to the support of the NGO Forum "Razem" and the Study's Steering Committee, which disseminated information about the study, thus strengthening the study's credibility and ensuring that the invitation reached the right individuals.

No categorization of the international actors was assumed at the beginning of the study as the number of organizations still operating in Poland at the time of the research was relatively small. However, based on internal discussions and the available literature, the following categories of local organizations were identified as key for ensuring sufficient diversity: Roma-led, Ukrainian-led, Polish humanitarian, WR and LGBT+, specialized in distributing funds, community-led or informal, and launched in 2022 or later. A minimum representation was established for each category. Later sampling targeted local organizations, whose websites clearly showed that they had been involved in international partnerships as part of the Ukrainian response, bearing in mind the minimum representation requirements. Initially, over half of the local actors did not respond to our invitations. Eventually, however, we managed to reach many of them through their local NGO connections, who also encouraged their participation. This can be classified as snowball sampling if we remember that such references played a role in encouraging participation. In the end, 8 local organizations declined participation or failed to respond.

13 international actors participating in the study were encouraged to share their partnership agreement templates, either via email or during the interviews. Only 6, all of them INGOs, decided to do so.



3.4. LIMITATIONS

Time available. The time available for this research was three months in total, which proved to be challenging, particularly when gathering a wealth of information on such a rich topic from so many stakeholders. The analysis was therefore oriented towards providing useful observations and recommendations rather than developing an exhaustive picture of the localization processes.

Research fatigue. Local actors were invited to participate in many studies and to respond to many surveys from late 2022 to early 2023. Some of them were therefore reluctant to engage in our study.

No baseline and missing information. Our observations on 2022 and 2023 are based mainly on what the research participants remembered. Some data were difficult to obtain, in particular financial and administrative data.

Our sample is not statistically representative. This allows us to give examples of better and worse practices or development scenarios that are more or less in line with the Grand Bargain Commitments, but it does not allow us to extrapolate observations on the response as a whole. Given the study topic, local organizations which had international partners and were willing to share their experiences constituted the vast majority of research participants. Compared with other available studies, it is likely that local organizations that have been more successful at attracting international funding are better represented in the study[23].

Differing motivations of research participants. Local and international actors understood their participation in the study differently. The latter more often saw it as their responsibility. Local actors were less likely to see localization as a process they co-owned, thus seeing the research as something they should participate in or could benefit from. During outreach, we also learnt that some of the L/NNGOs saw the research as answering the needs of international actors rather than those of their local partners. These differing motivations are likely to have impacted the sample's structure. Local organizations were more likely to decline participation or not respond to the invitation. Some of them responded by saying they would gain no benefits from this study.

"But don't quote me on that!". Research participants represented their organizations and were careful to fulfill their role loyally. They sometimes evaded answering questions if there was a risk their organization's reputation might be compromised. Some invited us to read between the lines, which we could not ethically do.

[23] Beata Charycka, Julia Bednarek & Marta Gumkowska, *When working in crisis becomes daily life. Local organisations supporting refugees in Poland*, Warsaw: Klon Jawor 2024.

Missing or under-represented actors. The study focuses on the relationships between non-governmental sector organizations in Poland and their international partners. Local governments or representatives of aid and social security institutions operating under their supervision have not been included in the study. Since their role in the response has been immense and their activities very broad, another study is recommended to reliably analyze them.

Positionality. This research originated from the NGO Forum "Razem" and has been supervised by a Steering Committee composed of representatives of the following organizations: CARE, NRC, Oxfam, Foundation Ukraine, Mudita Association, Migration Consortium and the NGO Forum Coordinator. Additionally, CARE, NRC, and Oxfam are funding partners of the study; Save the Children and Plan International Poland are contributing partners, and PAH – the hosting agency of the NGO Forum "Razem" – acts as the operator. As the Groupe URD research team, we also have various backgrounds and levels of involvement with the Ukrainian Response: some of our members have been involved in the response, some had experience in the Polish migration sector before the 24th of February, and some have experience in humanitarian response in other contexts. We tried to make use of our diverse experiences and find perspectives that bridge the differences between the different localization stakeholders. For this reason, we believe the research may be most interesting to those persons and entities involved in mediation or cooperation between actors with differing interests, objectives and identities.

4. SITUATION ANALYSIS: THE POLISH NGO LANDSCAPE BEFORE THE 24TH OF FEBRUARY 2022

This chapter discusses the characteristics of the local actors that participated in the study that we found most relevant to the later localization dynamics. These characteristics are related to how the organizations built partnerships and cooperation networks, as well as how they made ends meet. The observations recounted below are drawn from the existing literature, our field research (individual and group interviews), as well as analysis of the published documents (financial statements) of local organizations.

It should be stressed that the analysis focuses on the older players in the field, i.e., those active before 24th of February 2022, which are likely to have higher organizational capacities and more mature organizational identities than many initiatives born in the years following. To a degree, age is an advantage in organizational development that allows organizations to settle in their areas of specialization, adequately allocate the talents of their staff, and build trust, partnerships and financial capital.

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4.1. PROFILES OF L/NNGOS OPERATING IN POLAND BEFORE 24TH OF FEBRUARY 2022

The local landscape of NGOs and civil society initiatives is a mosaic of identities, experiences and organizational goals. A local actor may be just a few activists or a large aid organization with an established international presence. Some local actors are solitary players; some join cooperation networks or form consortia. Actors also differ in terms of their target audiences or the groups they aim to support. 35 local actors that were established before the year 2022 contributed to our study. Despite the fact that each of them has a unique history, they share some characteristics and thus can be divided into several categories.

Polish humanitarian organizations – this category covers NGOs founded in Poland that have their head offices there and are part of the global humanitarian system. By February 2022, these organizations already had experience in implementing international projects abroad which were funded by INGOs, UN agencies and international donors. These organizations were typically more familiar than others with the UN coordination structures and the notion of coordination itself, the typical modalities of large-scale humanitarian assistance (e.g., cash projects), procurement and reporting requirements that are typical of the global humanitarian sector, and – last but not least – the humanitarian vocabulary. The engagement of Polish humanitarian organizations in Polish civil society protests was an exception rather than the rule, as the approach of neutrality they adopted abroad was also assumed in their home countries. On average, these organizations recorded a much higher turnover than most local actors.

Number of Polish humanitarian organizations (operating before 2022) included in this study: 3.

Migration sector organizations – Migration sector organizations are distinguished by the targeted groups (migrants and refugees), their relation to state institutions, as well as their typical modalities of work. The organizations provide direct assistance to migrants and refugees, typically covering legal assistance, support in administrative procedures, educational support (Polish-language courses or support for children adapting to the Polish school system), support in finding accommodation, and crisis intervention support (e.g., for homelessness or violence). The main modality of assistance provision before 2022 was casework. Human rights monitoring and advocacy is also an important part of their work. Migration sector organizations operate in a context of dense legal regulations, with legal expertise being one of their biggest assets. In the academic literature, many of the organizations in this sector have been described as actors of Europeanization as they have contributed to the institutionalization of EU legal and administrative standards in public office and have mobilized EU control mechanisms

against these offices in cases of rights violations.[24] It should also be stressed that the migration sector organizations have been a major source of expertise regarding migration-related questions in Poland, publishing reports, legal commentaries, and responses to projects related to legal acts or policies. Some activists and organizations in this sector have experienced state violence in relation to their monitoring and aid activities on the Polish–Belarusian border. Among the migration sector organizations operating before February 2022, there were also organizations whose leaders (board members or directors) had refugee or migration backgrounds.

Number of migration sector organizations (operating before 2022) included in this study: 5.

Diaspora and minority NGOs – The number of Ukrainians in Poland was estimated at 1.5 million before 24th of February 2022[25]. The Roma community was estimated at 20,000 members (based on the language criterion)[26]. These are the two groups of most interest to the study. Unlike most local organizations in Poland, diaspora organizations pursued goals which were more difficult to inscribe into the dominant vision of public good or charity. That is why they have sometimes found themselves in a more dire financial situation than other players. Activities of diaspora organizations depended on the needs of local populations and ranged from support for newcomers adapting to life in Poland (especially in the case of Ukrainian-led organizations) to cultural activities and advocacy[27].

Number of diaspora and minority organizations (operating before 2022) included in this study: 8 Ukrainian-led and 2 Roma-led.

Women's rights organizations – An analysis of women's rights organizations and civil initiatives in Poland in the years 2018–2020 conducted by FemFund concluded that feminist activism was a widespread social movement[28]. "Feminists are everywhere",[29] stressed the authors, pointing to the presence of women's rights initiatives in a variety of social and cultural contexts. The report focused on applicants for mini-grants (about EUR 1,000) and included an analysis of over 600 grant applications. While feminist initiatives have been instigated across Poland, the best established organizations are located in the biggest cities. Advocacy and support for persons at risk of violence

[24] Kaja Skowronska, *Serving or controlling? Conflicting logics of migration policy in Poland after the 2013 Act on Foreigners. A case study of the Department of Foreigners of the Masovian Voivodeship Office*, PhD thesis, Institut d'études politiques de Paris École Doctorale de Sciences Po & Institute of Philosophy and Sociology of the Polish Academy of Sciences in Warsaw, 2016.
[25] The number of valid temporary and permanent stay permits and long-term EU resident permits applied for in 2021 exceeded 650,000 (Foreign Office data available at migrant.gov.pl). This figure may be treated as a rough estimate of the number of Ukrainians who had already been in Poland for at least a few years and/or planned to stay here longer. The actual number of such longer-term diaspora members is likely to be higher as not all migrants frequently traveling to Poland met the requirements to qualify for these stay permits. See also: *The Polish School of Assistance*, p. 14.
[26] Government statistics, available at https://www.gov.pl/web/mniejszosci-narodowe-i-etniczne/romowie (accessed on 06.06.2024).
[27] For more information about the role of the Ukrainian community in the response, see: *Polish School of Assistance*, 53-56.
[28] Magdalena Grabowska, Marta Rawłuszko, Małgorzata Leszko & Justyna Frydrych (eds.), *Jest opresja - jest opór. Raport Funduszu Feministycznego*, Warsaw: FemFund 2022.
[29] *Ibid.*, p. 14.

constitute the core activities of the organizations in this sector. Women's rights organizations have been the key proponents for the legalization of abortion in Poland, with some activists experiencing state violence during the second term of PiS government in relation to their fight for the right to abortion[30].

Number of women's rights organizations (operating before 2022) included in this study: 1.

LGBTQ+ rights organizations – Similarly to women's rights organizations, the activities of these LGBTQ+ organizations center on advocacy and the protection of LGBTQ+ persons from violence. A large share of their objectives are also related to increasing legal protection for LGBTQ+ community members against discrimination, hate speech and hate crimes. It should be stressed that during the second term of the Law and Justice (Polish acronym: PiS) government, members of this community fell victim to such harassment as well as to institutionalized exclusion by local law that was legalized by the government and justified by publicly propelled prejudice[31]. LGBTQ+ activists also faced arrest and criminal charges for protesting[32]. These organizations have played an important role as experts on matters related to equal treatment, anti-discrimination and sexual education. To date, the LGBTQ+ community has had very limited rights or access to public funding for self-organization (there are no dedicated funds and alignments with local governments are very rare). Organizations are typically located in the biggest cities.

Number of LGBTQ+ organizations (operating before 2022) included in this study: 2.

Funds, Fund distributors and Facilitators (3F organizations) – this category groups together "intermediary level" organizations, which are NGOs specializing in supporting other NGOs in their activities and development. The forms of support provided before 2022 included the distribution of grants and guidance in project realization, facilitating networking between local actors, and advocacy (including highlighting the needs of the NGO sector before those of government institutions).

Number of 3F organizations (operating before 2022) included in this study: 4.

Organizations targeting children and youth at risk through protection and education – Local organizations in this segment differed in many respects, but those included in the study shared characteristics that became important in our later considerations over localization. Firstly, they operated in the dense institutional context of state education and the social security system. Secondly, many of their activities focused on creating

[30] The first court case of an activist charged with helping a woman in crisis abort her pregnancy took place in 2023. Justyna Wydrzyńska of the Abortion Dream Team was pronounced guilty.
[31] See for instance: *Memorandum on the stigmatization of LGBTI people in Poland*, Commissioner for Human Rights, Council of Europe, 3 December 2020, https://rm.coe.int/memorandum-on-the-stigmatisation-of-lgbti-people-in-poland/1680a08b8e [23.04.2024].
[32] e.g., https://www.amnesty.org.pl/wp-content/uploads/2022/07/THEY-TREATED-US-LIKE-CIMINALS-report-on-LGBTI-activists-in-Poland-Amnesty-International-EUR3758822022english.pdf

bonds (e.g., a safe, enabling environment) rather than providing any kind of good. The primary need of these organizations was to have continuous, long-term funding ensured for these activities as their abrupt end was likely to translate into risks for their participants (e.g., the closure of a diaspora school in the middle of a school year increases the risk of unsuccessful adaptation in Polish schools, gap years, or dropping out of the education system altogether).

Number of organizations targeting children (operating before 2022) included in this study: 3.

Organizations targeting persons with disabilities and their families – Local organizations targeting persons with disabilities and their families focused on addressing gaps in the system of public assistance. The organizations which contributed to the study tended to build communities around their activities. Foreign languages or academic competence were not necessarily the key tool in this line of work; however, we encountered one leader who stated that English-language communication was the chief barrier to building strong partnerships in these organizations.

Number of organizations targeting persons with disabilities (operating still before 2022) included in this study: 2.

The above list does not exhaust the characteristics of L/NNGOs included in this study as some organizations had a broader or a different scope of activities. However, the typology is based on those features of local organizations which, as we found, mattered most in the localization dynamics.

Important differences between local actors were also related to their relationships with faith and religion. Two local organizations included in the sample were embedded in **faith-based networks**. Only one of them had the official status of a church organization (*kościelna osoba prawna*) and a significant share of its funding came from religious institutions. In the case of the other organization, its links to organized religion were weaker and funding from this source accounted for only a small share of the income in the annual budget. However, in both cases, faith-based networks and their resources were important in mobilizing funding and accessing targeted populations.

Another significant difference between local actors contributing to the research was related to the size of town or city in which they were based. Big cities gave civic actors an immense advantage in coordination and networking as well as in the quality of their contact with local governments. **Organizations in smaller towns** had more difficulty accessing information about funding and development opportunities[33]. Moreover, their relationships with local governments were often informalized: rather than being civil society actors within a local governance framework, they were seen as individuals sharing their personal criticism or asking for funding

[33] An analogous observation with regard to women's rights organizations can be found in: *Jest opresja – jest opór*, p. 47.

for their private goals. One of the research participants representing a Ukrainian-led organization shared a story of how he was received by the town hall: he was addressed by his first name and asked what he wanted again.

Despite the differences, some features were shared by many of the local actors included in the study:

- Most L/NNGOs had few resources beyond their individual capacities and the work of their members. The largest organizations in the sample also owned real estate (5 cases, based on financial statements).
- Most of those included in the study were left wing, pro-democratic and non-religious, but were not affiliated with any political party. Those involved in promoting LGBTQ+ rights, women's rights or supporting migrants and refugees at the Polish–Belarusian border had good reason to fear political repressions from the PiS government. Some of them faced legal harassment.
- Many L/NNGOs aimed to be places that were free of stigma, discrimination or marginalization, for not only their target audiences but also their members.
- In the next section, we also show that L/NNGOs, especially those focusing on work in Poland, were largely underfunded. At the same time, they typically retained their capacity to operate thanks to public funding, voluntary work and private donations.

4.2. L/NNGOS' RELATION TO STATE INSTITUTIONS

With outliers, L/NNGOs participating in the study were characterized by their strong **commitment to shaping national policies and institutions**. This commitment was expressed in several ways. For instance, many local NGOs saw their activities as "doing the state's job" or "filling in the gaps" in public policies[34], thus conveying the expectation that state institutions should take more responsibility for the welfare of people targeted by the organizations.

L/NNGOs' commitment to shaping the state's policies and institutions was typically informed by a **pro-democratic agenda**. In some cases this agenda was openly expressed, while in others it manifested itself through how the organizations operated. L/NNGOs performing watchdog activities are a good example: their rights monitoring was often aimed at informing legal proceedings before Polish and EU courts or making violations public. In both cases, the control mechanisms of the democratic system (even if in crisis) were mobilized. The significance of these activities should also be stressed in the context of the shrinking civic space under the PiS government.

[34] See also: *When Working in Crisis Becomes Daily Life*, 66.

The term **"Europeanizers"** may be applied to a large share of these organizations as they not only saw Poland as an EU member, but also used EU laws and institutions to bring about the change they believed was needed.

While the Ukrainian- or Roma-led organizations were less often associated with Polish national politics, they contributed to Europeanization and protecting the democratic institutions in Poland by ensuring that their minority cultures are cultivated and minority self-representation is a part of public life.

Interestingly, many local activists not working in humanitarian organizations also followed the debate over humanitarianism and post-coloniality. Their view of the humanitarian system was often critical, especially in relation to the costs of operation and the disproportions of power between international humanitarian actors and local actors in the contexts of their operations. Many local activists pre-judged their international partners at the beginning of the response. Outliers to the above characteristics include the fact that the Polish humanitarian organizations that took part in the study were more aligned with humanitarian ideals of neutrality and often more consumed with their activities abroad than in Poland.

4.3. L/NNGOS' FINANCING AND RESILIENCE

Research participants representing local actors were asked to characterize their organizations' financial situations before 2022. Based on the results, the main sources of funding for an average L/NNGO at that time were local government funds, governmental funds, EU funds distributed locally, private donations, 1/1.5% personal income tax delegated to social and civil organizations, and grants from Polish organizations that distribute international funding. The funding structure differed according to organizations' profiles and their years in business. For instance, established organizations that advance civil society and civil rights agendas successfully applied for funding from local and international sources related to strengthening democracy. LNGOs with humanitarian missions abroad won funding from international donors, humanitarian INGOs and international embassies (although the Polish Aid Fund administered by the Polish Ministry of Foreign Affairs remained a significant source of income in two cases). Religious or faith-based organizations could also count on funding from their faith-based networks. Based on the interviews, most organizations that had been in operation for at least a decade by 2022 had **relatively diversified funding portfolios**, with a high share of public funding from local sources (state institutions or local governments). This indicates that these organizations were better established than most Polish NGOs[35]. The preselection criterion of having international partners after 2022, combined with their self-selection (decision to take part in the study), may have resulted in the underrepresentation of older actors facing more dire economic conditions.

[35] See also: *When Working in Crisis Becomes Daily Life*, 48.

Younger organizations had usually less time to build their financial resilience and relied on fewer sources of funding, including fees for their services (2 cases), but the more financially robust actors were unwilling to ask for such payment. One of the research participants representing an L/NNGO specializing in funds distribution and supporting smaller local actors stated that the smallest initiatives' **first grant** was typically a turning point for them. In her view, a successful grant application meant continuing on the same path rather than looking for funding elsewhere.

It should be stressed that diversification of funding sources does not equal financial stability or sufficient funding. Most organizations participating in the study had difficulty making ends meet without sacrifices on the part of staff (e.g., accepting low salaries or irregular employment), the dedication of volunteers, or "emergency" fundraisers (i.e., in addition to the fundraising plan).

Data collected during the interviews was approximate. Therefore, we decided to complement it with the analysis of yearly financial statements of selected organizations in the years 2019–2022 (4 statements per organizations). 31 organizations operating before 2022 were included in the sample. Only organizations that had published financial statements with a supplement (*informacja dodatkowa*) for the years 2019–2022 were taken into consideration in the analysis below. As not all data were comparable from statement to statement, we only present a comparison of some analogously categorized information. This information is not representative of the NGO sector, but it provides an idea of how different the financial situation of local actors was before the 24th of February 2022. In the tables, we also include the year 2022 to show how the first year of the Ukrainian response was reflected in these organizations' budgets.

Income from core non-commercial activity as % of income of the biggest organization in the sample	2019	2020	2021	2022
Organization 1 (migration sector)	2%	3%	3%	2%
Organization 2 (LGBTQ+ rights)	1%	1%	2%	1%
Organization 3 (child protection)	19%	24%	33%	7%
Organization 4 (migration sector)	2%	2%	3%	1%
Organization 5 (migration sector)	2%	2%	5%	3%
Organization 6 (women's rights)	4%	6%	11%	1%
Organization 7 (diasporal)	1%	1%	1%	7%
Organization 8 (faith based, education)	8%	6%	5%	3%

Organization 9 (Polish humanitarian)	34%	48%	39%	53%
Organization 10 (diasporal)	2%	3%	4%	5%
Organization 11 (women's rights)	2%	2%	3%	1%
Organization 12 (Polish humanitarian)	100%	100%	100%	100%

Private donations as a share of income from core non-commercial activity	2019	2020	2021	2022
Organization 1 (migration sector)	9%	5%	11%	17%
Organization 2 (LGBTQ+ rights)	21%	47%	29%	36%
Organization 3 (child protection)	36%	41%	44%	39%
Organization 4 (migration sector)	15%	5%	*missing*	58%
Organization 5 (migration sector)	2%	4%	7%	36%
Organization 6 (women's rights)	*missing*	34%	17%	39%
Organization 7 (diasporal)	4%	7%	3%	42%
Organization 8 (faith based, education)	19%	61%	57%	13%
Organization 9 (Polish humanitarian)	5%	8%	8%	30%
Organization 10 (diasporal)	3%	1%	11%	71%
Organization 11 (women's rights)	6%	12%	11%	2%
Organization 12 (Polish humanitarian)	19%	27%	32%	12%

Public funding as a share of income from core non-commercial activity	2019	2020	2021	2022
Organization 1 (migration sector)	27%	18%	11%	1%
Organization 2 (LGBTQ+ rights)	*missing*	*missing*	*missing*	*missing*
Organization 3 (child protection)	33%	20%	26%	15%
Organization 4 (migration sector)	84%	95%	*missing*	41%
Organization 5 (migration sector)	96%	17%	86%	28%

Organization 6 (women's rights)	*missing*	58%	14%	29%
Organization 7 (diasporal)	12%	46%	42%	1%
Organization 8 (faith based, education)	80%	43%	8%	9%
Organization 9 (Polish humanitarian)	62%	56%	34%	5%
Organization 10 (diasporal)	98%	99%	89%	9%
Organization 11 (women's rights)	0%	0%	0%	0%
Organization 12 (Polish humanitarian)	8%	4%	10%	2%

Growth rate of income from core non-commercial activity	2020	2021	2022
Organization 1 (migration sector)	1.45	0.97	6.22
Organization 2 (LGBTQ+ rights)	0.49	4.02	3.16
Organization 3 (child protection)	1.34	1.21	1.71
Organization 4 (migration sector)	1.42	1.19	2.24
Organization 5 (migration sector)	1.45	1.97	4.16
Organization 6 (women's rights)	1.48	1.74	0.99
Organization 7 (diasporal)	0.84	1.89	44.79
Organization 8 (faith based, education)	0.77	0.74	4.46
Organization 9 (Polish humanitarian)	1.50	0.72	11.15
Organization 10 (diasporal)	1.86	1.19	12.04
Organization 11 (women's rights)	0.92	1.52	2.36
Organization 12 (Polish humanitarian)	1.06	0.90	8.09

Private donations growth rate	2020	2021	2022
Organization 1 (migration sector)	0.89	2.01	9.62
Organization 2 (LGBTQ+ rights)	1.08	2.54	3.82
Organization 3 (child protection)	1.55	1.30	1.50

Organization 4 (migration sector)	0.46	*missing data*	*missing data*
Organization 5 (migration sector)	2.65	3.40	22.75
Organization 6 (women's rights)	*missing data*	*missing data*	2.24
Organization 7 (diasporal)	1.22	0.73	752.25
Organization 8 (faith based, education)	2.46	0.69	1.03
Organization 9 (Polish humanitarian)	2.51	0.70	41.44
Organization 10 (diasporal)	0.38	21.40	76.27
Organization 11 (women's rights)	1.78	1.46	0.43
Organization 12 (Polish humanitarian)	1.56	1.05	3.13

The analysis of financial statements and data collected through interviews made it possible to formulate a couple of further observations:

- For almost all interviewees, **public funding** was among the three most important funding sources before 2022. Outliers were either the financially most robust (i.e., humanitarian organizations with a large share of funding from UN, EU or INGOs, one organization that was able to mobilize financial support from its faith-based networks) and organizations without access to dedicated funding (especially the women's rights and LGBTQ+ organizations).
- Bigger and medium-sized actors (with an yearly income from non-commercial core activities of PLN 1–5 million) typically had **diversified funding**, with a large share of income from public sources. In their financial statements, similar funding sources repeated from year to year, indicating their intention to build steady relationships with their financing institutions and organizations.
- **Diasporal organizations** and self-led migrant community-based organizations registered significantly lower levels of income from private donations or the PIT 1–1.5% deduction (which dramatically changed in 2022). Some relied on types of local government funding that did not cover key overhead costs. They were financially responsible for such projects, which they struggled to cover from the small donations.
- Even organizations with a yearly income from non-commercial core tasks that exceeded PLN 1 million occasionally applied for "**microgrants**" of several thousand PLN. Such funding often filled the gaps in their budgets resulting from the costs of other projects.
- Most organizations invested in developing **fundraising** activities to compensate for instabilities related to other funding sources. The data shows that raising private donations was especially challenging for the diaspora organizations, which before 2022

were less visible in the public sphere. The year 2022 brought a change in this regard, allowing them to not only grow thanks to international funding, but also to multiply the value of their private donations.

Resilience and coping mechanisms. When speaking of the financial situation of local actors before 2022, some of their representatives recalled relatively recent events that shook their organizations. These stories typically conveyed that their organizations were familiar with financial instability but often coped with it at the expense of their own members. Below are a few examples of such stories related to funding.

In 2015, organizations offering support to migrants and refugees in Poland learnt that the government had changed the system of distribution for the EU Asylum, Migration and Integration Fund (EU AMIF) in Poland, effectively limiting local civic organizations' access to these funds. The impact was not immediate, but in 2018 and 2019 some of the significant players on the scene announced they were on the brink of bankruptcy and organized public fundraisers for their own survival. In 2019, one of the most recognizable organizations in the migration field, Refugee.pl, suspended its activity, only to be revived in 2022. Most others made ends meet thanks to the development of fundraising, the introduction of small fees for their services, bank loans, low salaries, and the reliance on volunteers, even for core tasks. A number of these strategies could be classified as negative coping strategies as they build organizational resilience on the basis of individual sacrifice. A positive coping strategy which also proved to be very effective was increased networking and cooperation. Realizing that increasing capacity may be instrumental to survival, many local organizations within the migration field decided to create formal and non-formal coalitions to cope with shrinking resources and create joint applications for funds. In 2017, The Migration Consortium was established.

While the decisions on the fate of the EU AMIF may have had dire consequences for some of the organizations operating in the migration field, civic actors involved in the fight for women's and LGBTQ+ rights pointed out that they could not count on any form of dedicated public funding, including EU funds distributed in Poland. These organizations engaged in national and international **horizontal networks** or cooperations linking similar initiatives. Such networks helped them find funding opportunities and share their expertise and experiences.

A women's rights organization's representative said that the Black Protests of 2016 were a turning point for them. They realized that feministic thinking was much more widespread than self-identification with "feminism" as a label. Investment in fundraising from individual supporters turned out to be the right decision and remained the organization's strategic goal.
A representative of an LGBTQ+ organization included in the study said that, before 2022, he and his colleagues had jobs outside of the NGO-sector. Funding was neither sufficient nor stable enough to provide them with more than occasional remuneration for their work. Although the organization can be classified as well-established, the scarcity of funding for the LGBTQ+ sector

forced the organization to rely on voluntary work for many of its tasks. Another challenge highlighted by this organization was the **scarcity of funding to cover their overhead costs**.

Considering their financial situation, what kind of **resilience and coping strategies** did the local actors bring to the Ukrainian response?

- Local organizations' implementation capacity was often built by individual sacrifices, especially working with little or no remuneration.
- Local actors experienced fluctuations of funding before 2022. Faced with the scarcity of funding, one of their important tactics was to diversify funding for key projects and positions, e.g., one position or activity could be financed from three sources in equal shares. This allowed them to maintain employment but complicated their administrative work.
- Since a significant proportion of these local organizations' funding came from local (national and EU, distributed locally) public sources, these projects shaped these local organization's administrative capacity. For many organizations only operating in Poland, the realization of a project from EU structural funds distributed locally marked the peak of compliance requirements.
- Many organizations accepted funding without partnership or ideological alliances. For instance, an NGO protesting against push-backs at the Polish–Belarusian border could also implement projects financed from the governmental budget.
- Organizations looking for opportunities to develop often found joining horizontal networks and cooperations fruitful. Horizontal ties allowed better access to information and facilitated more links with funding institutions. Formalized cooperation allowed smaller players to share experiences, coordinate activities, and raise funds more effectively.

4.4. COMMUNITY ELEMENTS IN THE INTERNAL ORGANIZATION OF (SMALLER) CIVIL SOCIETY ACTORS

As already mentioned, many civil society organizations coped with **long-term financial difficulties**. Others feared or experienced state repression for their activities. These actors could offer their employees neither good pay, nor a sense of stability. What attracted individuals to the work were the strong group identities that united these organizations' members and the meaning they derived from the work. This meant local organizations were also communities cemented by shared ideals and sometimes also the shared feeling of being marginalized. As already mentioned, in some cases the shared mission and the challenges pushed local actors to network more intensely or formalize existing collaborations.
It was not uncommon for persons who matched the profile of the organizations' target populations to work, sometimes in leading positions, at these organizations (e.g., a high number

of people with migration backgrounds worked in migration organizations, while diaspora, LGBTQ+ and women's organizations were typically self-led enterprises). Some local actors sought to give jobs to people whose skills may not have been compatible with the labor demands, but they matched the needs of their organizations. As job givers, local actors were driven not only by the principle of the effective allocation of resources, but also by the impulse of care.

In smaller local organizations, these community elements made their later capacity growth (especially increasing the number of employees) challenging. For instance, introducing new members into a community is often much more time-consuming than onboarding new employees. Smaller local actors with strong community characteristics sometimes had to choose between remaining strong collectives or building specialized organizations that are capable of entering international partnerships and implementing large-scale projects.

4.5. INTERNATIONAL ACTORS OR NETWORKS PRESENT IN POLAND BEFORE THE 24TH OF FEBRUARY 2022

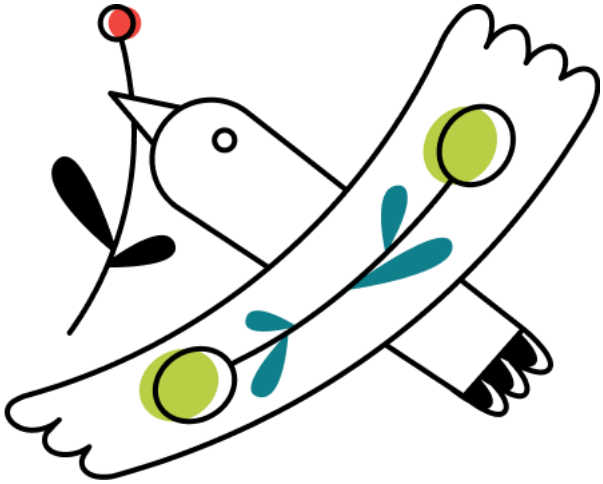
Poland signed the Charter of the United Nations on 15 October 1945 and became a full member of the UN, assuming increasingly important functions over the years. Before 2022, several UN agencies and programs were active in Poland, focusing on development, humanitarian aid, and human rights issues. The main agencies included UNICEF, which concentrated on children's rights, education, and enhancing social services. UNDP was engaged in development efforts, while UNHCR, operating since 1992, focused on refugee protection and assistance, as well as policy advocacy with limited direct interventions. IOM started its operations in Poland in 2002 under an agreement with the Polish government. This agency was active in the prevention of human trafficking, supporting migrants who were willing to return to their home countries, and the integration of migrants into Polish society. IOM collaborated with state institutions and services, local governments, and employers to provide information and training.

Before 2022, the presence of UN agencies in Poland was characterized by a focus on development, health, education, and migration-related issues; it operated on a limited scale with relatively low staffing levels. During this period, UN agencies collaborated with local and national governments and NGOs on capacity building, policy advocacy, and system strengthening, rather than direct intervention. Their work was mainly programmatic and strategic.

Two major international networks had representatives in Poland before the 24th of February: members of the Caritas Confederation and of the Polish Red Cross, which is part of the Red Cross Movement. The Polish Red Cross (PCK) has been active in Poland since 1919; it has over 200 chapters at county (powiat) level and an even wider network of grassroots-level initiatives

(e.g., school circles). PCK's scope of activities was wide before the Ukrainian response, ranging from supporting people at risk of economic exclusion to the promotion of blood donations and first aid education.

The Caritas network comprises 45 diocese chapters of Caritas and Caritas Poland, which is a Polish humanitarian organization operating both in Poland and abroad, with four help centers in different Polish cities. Before 2022, many of the activities of Caritas Poland were related to supporting migrants and refugees. Considering the scope of these activities, it can also be classified as a migration sector actor.



4.6. CONCLUSIONS

Several observations from this analysis are especially relevant to the later localization dynamics. Firstly, some of the local actors' coping strategies impacted the way they formed partnerships with international organizations after 24th February 2022. Secondly, for local actors, the importance of identity was not always understood by their partners, who often interpreted it in terms of manners rather than the institutional history of the Polish NGO world. Also, the category of financing without partnership or ideological alliance may explain some of the characteristics of the partnerships between the local and international organizations.

5. SITUATION ANALYSIS: FIRST WEEKS OF THE RESPONSE

This chapter focuses on the first weeks of the Ukrainian Response. It characterizes Poland as a site of intervention and seeks to identify the first actors involved in the aid activities. It also touches on two subjects impacting the later course of the response: coordination and expectations related to international partnerships.

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5.1. POLAND AS A SITE OF INTERVENTION

Many of the characteristics of Poland as a site of humanitarian intervention have favored an ambitious localization agenda. What most research participants pointed to was a vibrant civil society, Poland's membership in the EU (cited as a benchmark of institutional development) and the high social legitimacy of aid activities targeting Ukrainian refugees when the emergency mobilized mass popular support in the first months of the response.

Research participants also recognized that the political decisions on the legal status of Ukrainian refugees spared them the fate of other groups that are socially excluded by law. In the first days of March, the EU applied, for the first time in history, its temporary protection legislation, granting refugees from Ukraine (including third-country nationals) the right to remain legally in the EU.[36] A few days later, the Polish government passed a special act allowing Ukrainians fleeing the war to remain legally in Poland, enter the labor market, and have access to key social services and transfers.[37] While these decisions have not ensured the automatic inclusion of refugees in society or their non-discriminatory treatment, they have provided the refugees with instruments to start a life in a new country.

A few international actors observed that despite the immense scale of forced migration from Ukraine in 2022, the grim scenarios known from other sites of humanitarian intervention were avoided.

A large share of interviewees also pointed out that Ukrainian refugees were seen as white and Western and were less likely to be othered or racialized, as opposed to other groups of migrants. Some local organizations referred to the parallel humanitarian crisis at the Polish–Belarusian border to show how racism came into play in the Ukrainian response[38].It was also clear from the discrimination of Roma people and third-country nationals escaping the war in Ukraine that a racialized perception of "good" and "bad" refugees was in play[39].

What may have added to the widespread feeling of empathy towards the Ukrainian refugees was not only their image as culturally and ethnically close, but also the fact that the vast majority of them were women and children[40].
The specificity of the Polish context created new challenges and invited questions about what an ambitious localization plan should look like: How to build partnerships between international and local actors? When should the international involvement end, and how should the aid work be handed over?

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[36] See also: *The Polish School of Assistance*, 14.
[37] Ustawa z dnia 12 marca 2022 r. o pomocy obywatelom Ukrainy w związku z konfliktem zbrojnym na terytorium tego państwa.
[38] See also: *The Polish School of Assistance*, 9.
[39] Poland: *Authorities must act to protect people fleeing Ukraine from further suffering*, Amnesty International, 22 March 2022, https://www.amnesty.org/en/latest/news/2022/03/poland-authorities-must-act-to-protect-people-fleeing-ukraine-from-further-suffering/ (accessed on 06.06.2024).
[40] Over 80% as of the end of 2022, see: *Polish School of Assistance*, 16.

5.2. WHO IS ON THE GROUND?

Based on the data of the Polish Border Guard, between the 24th of February and 22nd of March 2022 over 2 million persons crossed the Polish–Ukrainian border[41]. The numbers were unprecedented in Polish history, as was the civil society mobilization to provide support to the incoming refugees.

Only one organization contributing to this study did not engage in the Ukrainian response. It was a small local organization focused on projects at the Polish–Belarusian border. This NGO saw itself as a beneficiary of the increased presence of INGOs in Poland. It had evolved from a bigger initiative which, for safety concerns, decided to formally separate its work at the Polish–Belarusian border from all other migrant support organizations, including the Ukrainian response. The interviewee shared this story to explain their organization's noninvolvement in the response, which she considered rare. She believed most civil society actors would feel compelled to engage. The Russian full-scale invasion of Ukraine was a direct threat to Poland, and solidarity was civil society's response not only to the needs of the refugees, but also to the aggression. Another interviewee simply said: "I think everyone got involved, from humanitarian actors to animal rights organizations" (INGO). The earlier point about the racialized perception of "good" (Ukrainian) and "bad" (other) refugees should be restated here because what likely contributed to the mass mobilization of support for Ukraine was the perception that this crisis might also happen to us ("us" perceived as white and Western)[42].

Indeed, local communities in towns and cities where large numbers of refugees found themselves in the first weeks of the response, local governments and the institutions they led, various L/NNGOs and the thousands of people who had never previously engaged in public or aid activities were among the first to respond. International organizations that had their offices in Poland were also among the first to witness, document and provide assistance to the people fleeing Ukraine. Despite their mobilization and swift action, it seems only fair to say that the first weeks of the response were shaped by local actors.

What did the local actors bring? What did they lack?

Local actors mobilized a vast pool of private and local community resources and found ways to share them. Public utility buildings became places of temporary accommodation, and private flats hosted thousands of refugees. Volunteers cooked and delivered food along the main transit

[41] Statistics available at: https://www.strazgraniczna.pl/pl/granica/statystyki-sg/2206,Statystyki-SG.html (accessed on 06.06.2024).
[42] As Zainab Moallin, Karen Hargrave, and Patrick Saez of ODI write: "Media coverage of the war has been marked by narratives framing the war as a 'different kind of crisis' and Ukrainian refugees as a 'different kind of refugee'. This has contributed to a hierarchy of refugee protection in Europe: a warm welcome towards Ukrainians contrasts sharply with hardline policies towards other groups". (*Navigating narratives in Ukraine: humanitarian response amid solidarity and resistance*, ODI, https://odi.org/en/publications/navigating-narratives-in-ukraine-humanitarian-response-amid-solidarity-and-resistance/ (accessed on 4.06.2024)

paths. Private cars turned into free transportation services. On social media and online portals, groups emerged where help could be offered or requested. The business world mobilized and pooled their resources. Many NGOs and local governments immediately widened access to their services and adapted them to the needs of Ukrainian speakers.

The Ukrainian diaspora and its organizations in Poland mobilized immense support which was targeted to both the refugees in Poland as well as to Ukrainians in Ukraine. Roma-led organizations offered support to Roma refugees and played a key role in drawing the attention of other NGOS and the general public to the discrimination of Roma people. These actors not only had the most accurate understanding of the needs of the incoming refugees but also became natural points of contact for many of them[43].

Organizations with experience in the migration sector, both local NGOs and UN agencies, were also able to identify injustices and risks in this wave of support. Based on interviews with representatives of these actors, the issues mainly concerned discrimination against third-country nationals, risks related to human trafficking, gender-based violence, insufficient safeguarding and strong proximity bias in the delivery of aid. A representative of one local initiative that was set up on the 24th of February 2022 confirmed this view. She regretted that she and her team had not had the knowledge concerning safeguarding and human trafficking that they later gained. She recalled the haste with which people got onto buses and into private cars and wondered if all of them reached their intended destinations. She also remembered how some volunteers treated third-country nationals and Roma refugees. Similar risks were also highlighted by Human Rights Watch[44].

An important role was also played by Polish humanitarian organizations, which – unlike the majority of local actors – had some idea of what such crises may look like and what they may require. Together with larger NGOs, such as Wielka Orkiestra Świątecznej Pomocy (WOŚP), they also managed to mobilize large numbers of volunteers and introduce some elements of large-scale assistance. One of the organizations contributing to this study was able to mobilize as many as 20,000 volunteers and assign r tasks to them in the first weeks of the response. Humanitarian organizations also worked on responding to the crisis in Ukraine (e.g., by supporting evacuations or providing medical aid), which allowed them transborder insight into how the crisis would develop.

[43] *The Polish School of Assistance*, 53-55, 56, 63.
[44] *Poland: Trafficking, Exploitation Risks for Refugees*, Human Rights Watch, 29 April 2022, https://www.hrw.org/news/2022/04/29/poland-trafficking-exploitation-risks-refugees (accessed on 06.06.2024).

5.3. COORDINATION AND COOPERATION

Interviewees representing international humanitarian actors pointed out there was little coordination between local actors in Poland before 2022. Typically humanitarian coordination mechanisms were indeed scarce, but formal and informal networks of cooperation existed.

By humanitarian coordination, we mean relatively independent structures which aim to ensure that actors involved in a similar type of activity or with similar target groups share information on what their target audiences might need. Coordination structures help humanitarian actors align activities, share research and experiences from the field, identify emerging needs, and spread information regarding funding or development opportunities. Coordination mechanisms work transparently and collaboratively. Ideally, they should also remain uninvolved politically in order to allow the various actors to engage in humanitarian activities[45].

The term "cooperation" is wider. It covers small online initiatives (that share support requests and offers), networks and consortia of local organizations of similar profiles, and dialogue tables and working groups organized by local governments. Forms of cooperation may be more or less formalized or politically engaged. Coordination mechanisms are a form of cooperation.

Examples of groups that performed coordination functions before 2022 and played an important role after the Russian full-scale invasion, include:

- The Integration Support Group, which was established in Lublin in 2013. This informal group met monthly to discuss the challenges posed by migration-related demographic changes. It included local government officials as well as representatives of police, Border Guard, and social organizations. In 2021, local organizations, led by Homo Faber, officially requested that the President of Lublin establish a Civil Dialogue Commission for the integration of migrants in Lublin. The goal was to create a formal presidential advisory body with a structured process which would initiate projects in the city. Eventually, a coordinating body was established and the large share of its work was related to the Polish–Belarusian border crisis. Drawing on these experiences, structures and resources, the Lubelskie Social Aid Committee for Ukraine was established as an informal platform of around 400 volunteers for coordinating humanitarian aid in the city.. At the beginning of March 2022, thanks to the work of the Committee, a help center for refugees was also launched in Lublin as part of the Ukrainian response.
- Grupa Granica was defined as a coalition, coordination forum, as well as a social movement by the research participants as well as its members and supporters. Grupa Granica has operated since mid-July 2021 as a Migration Consortium initiative; it connects local actors (whether through formalized initiatives or not) who provide

[45] See for instance: UNHCR International Coordination Architecture, https://emergency.unhcr.org/coordination-and-communication/interagency/international-coordination-architecture (accessed on 06.06.2024).

humanitarian support to migrants at the Polish–Belarusian border in order to oppose push-backs and other forms of state violence.[46] Its functions include coordination, especially aligning activities and procedures between its members and collaborating organizations, sharing knowledge and experience, working on common public communication, and conducting research.

- Local government working groups, e.g., the Sectoral Commission for Social Dialogue on Migrants and Refugees (Branżowa Komisja Dialogu Społecznego ds. Cudzoziemców, BDKS), led by the city of Warsaw. The Commission grouped together 22 local actors for the purpose of addressing the needs of migrants and refugees in Warsaw in 2022.[47] It had a double function as an advisory board and also the town hall's ear on social initiatives[48]. In the first weeks after 24th of February, the Commission met daily – later, three times a week – to shape the response of the City of Warsaw to the mass arrivals of Ukrainian refugees. In the first weeks of the response, BDKS launched a city information portal and a coordination center (Centrum Wsparcia Koordynacji) for all actors involved in the response. In 2022, BDKS also launched seven working groups focused on the most pressing needs of Ukrainian refugees.
- Visible Hand (Widzialna Ręka) is a set of Facebook Groups launched in 2020 in response to the COVID-19 pandemic and the associated lockdowns. This group facilitated neighborly support in that people offered it help and asked for support. The groups addressed daily-life gaps in the COVID-19 policies, such as the need to do shopping or walk a dog while in quarantine. The groups soon joined the Ukrainian response with the aim of linking people in need with those willing to help.

While their contribution to the Ukrainian response is doubtless, such initiatives did not facilitate the spread of the coordinated response to wider geographic areas or within and between sectors. The first initiative related to creating humanitarian coordination structures was the NGO Forum "Razem", launched in March 2022 by the Polish Humanitarian Action (PAH) and Ashoka, with financial support from CARE and technical support from Netguru.

It is important to note that the forum was an initiative of Polish Humanitarian Action (PAH), a Poland-based NGO that operates at both local and international levels, hence it was already positioned in between the global and the local. The intermediary positions are further discussed in the enablers section. We would like to stress here that from the very beginning they played an important role in bringing together the various actors of the response and designed mechanisms for their cooperation.

[46] See: Grupa Granica, *O nas*, https://grupagranica.org/o-nas/ (accessed on 06.06.2024)
[47] *Sprawozdanie Branżowej Komisji Dialogu Społecznego ds. Cudzoziemców za rok 2022*, UM Warszawa https://um.warszawa.pl/documents/59210/55156188/Sprawozdanie+BKDS+ds.+Cudzoziemcow+za+2022+r..pdf/3655e49d-d7be-f357-f767-db924515783b?t=1707831501952 (accessed on 06.06.2024).
[48] Regulamin Branżowej Komisji Dialogu Społecznego ds. Cudzoziemców, UM Warsawa, https://um.warszawa.pl/documents/59210/55156188/Regulamin_BKDS_21.04.2023.pdf/2c44b9e0-2f74-a74b-df17-fee3f49ed820?t=1682499631098 (accessed on 06.06.2024).

Launching a coordination mechanism is a complicated process, and the NGO Forum "Razem" also had a tough beginning. Two participants of the study (one representing a local actor, and one an INGO) shared similar observations on its first weeks of operation, saying too many discussions revolved around the administrative problems that the international actors had to tackle to register as organizations in Poland. One of the participants said:

> *"Initially, the NGO Forum was intended merely to connect everyone and coordinate efforts, but its role has evolved somewhat since then. There was a dynamic where I felt international organizations used the forum as an entry point to gain insights into administrative issues like obtaining visas and opening bank accounts. At one point, it was primarily utilized by international organizations, but gradually it expanded and is now quite big".*

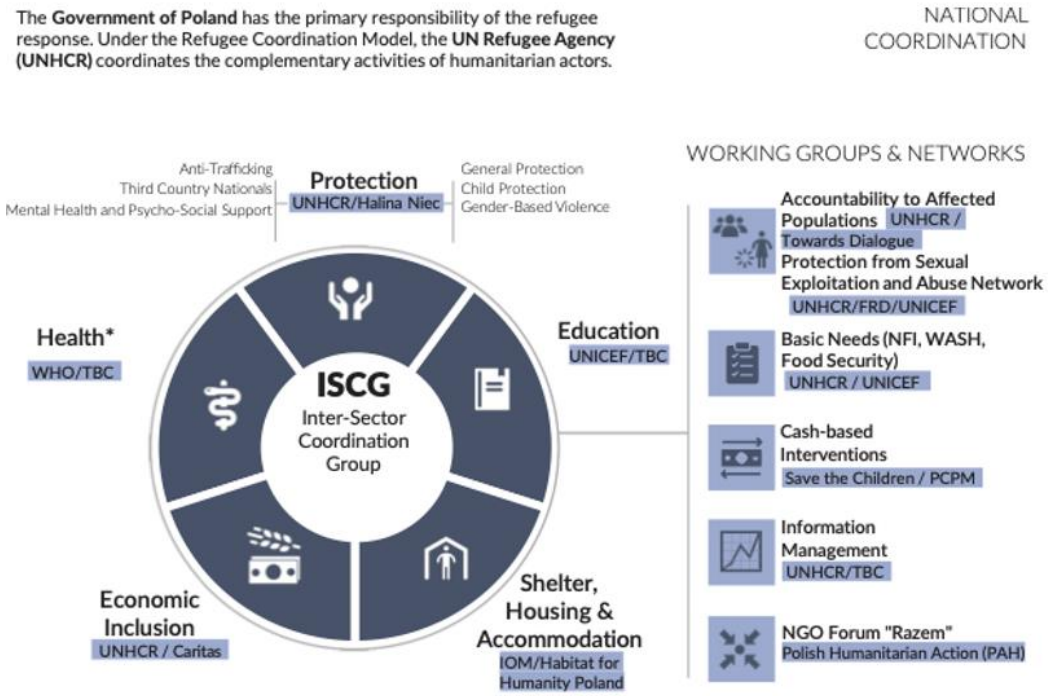
The research participants also pointed to another challenge related to the fact that local Polish actors were not familiar with coordination mechanisms and not entirely convinced that this form of cooperation would be beneficial for them. Both these research participants still believe that the number of registered organizations exceeds the number of active participants, with a more generous estimate being that about half of the registered actors actively participate in meetings.

In March 2022, the Refugee Coordination Model was designed and launched through the Inter-Sector Coordination Group (ISCG). It coordinates the work of humanitarian organizations which are part of the refugee response under the formal leadership of the Government of Poland. As the UNHCR explains:

> *The RCM [Refugee Coordination Model] facilitates interventions that are in line with government priorities while maximizing resource complementarity and impact. At the national level, the ISCG in Poland consists of the sectors [...] Additionally, several working groups and networks are reporting to the ISCG. Taking a localized approach, aside from the national structure, inter-agency Refugee Coordination Forums (RCF) are established in Mazowieckie (Warsaw), Małopolskie (Krakow), Lubelskie (Lublin) and Podkarpackie (Rzeszow).*[49]

[49] UNHCR, Refugee Coordination Forum in Poland, https://data.unhcr.org/en/documents/download/99402 (Accessed on 28.04.2024)

Refugee Coordination Model (RCM) architecture[50]



The RCM was neither an endemic coordination mechanism nor a grassroots initiative. Therefore, several typical localization barriers needed to be overcome to put it into motion. These included language barriers (the domination of English), local actors' lack of familiarity with the organizational architecture of the system, and (initially) the prevalence of representatives of international organizations in the leadership of the mechanism. Participation in the mechanisms grew to the expected levels only after the emergency phase was over, reaching over 80 organizations in the first year of the response, with local actors constituting the majority of participants.

From the perspective of this study, it should also be stressed that the coordination mechanism launched in the first weeks of the response needed time to start operating according to initial expectations. The aid efforts in the first weeks of the response can therefore be described as largely uncoordinated.

[50] *Ibid*. Please note this is a living chart regularly updated.

5.4. FIRST PARTNERSHIPS BETWEEN INTERNATIONAL AND LOCAL PLAYERS

Expectations in partnerships changed over time. Those from the very first weeks of the Ukrainian response are probably the most difficult to reconstruct. One reason for this is the popular willingness to give without expecting much in return; another is the common focus on the field.

The local and international actors contributing to this study had a similar narrative about the emergency phase of the response. They often used the word “chaos” to describe it due to the unpredictability of the situation and the lack of coordination. They felt an imperative to do as much as they could to respond to the emerging needs. International actors typically spoke of their search for local partners and the imperative to unlock the most flexible funding. Some openly mentioned their reliance on local actors for entering the field and spoke of the quality of local actors' fieldwork, which pointed to the fairly strong position of the latter in the first stage of the response.

Local actors shared stories of money flowing in from unexpected sources, which for many civil society actors that had previously struggled to make ends meet was an unprecedented experience. They used the verb “to give” (dać) to describe the grants award process, which showed how easy the procedures were in the initial phase. They described the compliance and reporting requirements as minimal or fully manageable, which fully harmonizes with how the international actors described their funds for the emergency response. However, most local actors remained unaware of where the money came from and how it could be awarded so flexibly. On the other hand, they typically interpreted the ease with which the international actors treated the administrative requirements as a token of their trust.

The first expectations arose when the emergency phase was reaching an end, some time in Autumn 2022. These are discussed in the chapter on the evolution of the response. Here, we would like to list some of the reflections on capacity growth and the broadening scope of their activities, which for many local actors happened in the first weeks of the response. Most of them engaged in activities that were new to them or only loosely related to their core activities. Later, they faced the question of how not to lose their identities, how to maintain their non-Ukrainian activities, and how to tackle internal organizational challenges resulting from this rapid growth. In retrospect, the representatives of L/NNGOs regretted

- That the international actors did not explain the humanitarian cycle to them. This would have helped the local actors to simply know what would happen; at every stage of the response;
- That engagement in the response affected their core non-Ukrainian activities;

- That international actors were not clearer about how emergency phase funding mechanisms differ from those used at the later stage of the response.

Most international actors expected better coordination. A number hoped to be able to implement ambitious localization agendas and thought the first months would be a very good starting point. It should be also stressed that, for the international actors, challenges included not only providing support to the targeted populations, but also mobilizing funding for the later phases of the response. In some cases, this required an immense amount of administrative work, of which local actors were largely unaware.

5.5. CONCLUSIONS

The first weeks of the response highlighted the first challenges related to the response and any localization attempts. What was clear from the beginning was that better coordination was needed. Poland is a large country and the refugees were free to travel to any areas. The likely geographical scope of the response was huge. Coordination would also be challenging in terms of the inclusion of the various institutional actors. The coordination mechanisms in operation before the 24th of February played an important role in the first weeks of the response, but none had a nation-wide scope. NGO Forum "Razem" made the first step towards integrating the local and international NGOs, as well as the UN agencies. RCM was a well-timed initiative but required time to build up its potential.

Some of the research participants and researchers stressed the insufficient support from central authorities[51]. Local governments and public institutions were involved in the support activities, but the central government, which had tasked them with a share of the aid activities, failed to support them with any transparent or predictable financial or response plan. Most importantly, the first weeks of the response showed the potential of using civil society actors to carry out aid activities. This was the best argument for pursuing ambitious localization agendas, which most of the international actors involved in the later response did.

[51] *Polish School of Assistance*, 81–85.

6. EVOLUTION OF HUMANITARIAN RESPONSE IN POLAND, FEBRUARY 2022 TO APRIL 2024

The aim of this chapter is to reconstruct the timeline of the humanitarian response to the arrival of refugees from Ukraine in Poland, taking into account the changing needs of the targeted populations, the evolution of the relationships between local and international actors, and the coordination, policies and public language around the refugees' reception. For convenience, the main research findings are presented in the following table, below which are some additional clarifications and observations.

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6.1. RESPONSE'S EVOLUTION

	Emergency phase: 24th Feb 2022 to Autumn 2022	Stabilization: Autumn 2022 to Winter 2022/2023	Scaling down: From Spring 2023
Main needs of targeted populations[52]	- Emergency support: food, clothing, transportation, temporary accommodation, medical and psychological support - Safety at every stage of the journey, in places of accommodation, and during aid provision - Regulation of legal status	- Integration related needs, e.g., longer-term accommodation, legal employment adequate to skills and experience, continuity of education for children and youths, identification of groups at risk of social or economic exclusion (e.g., older people or people with disabilities) with provision of tailored support, Polish language courses, etc. - Protection from discrimination and abuse, especially in aid- and work-related contexts - Better inclusion in the Polish social security system	

[52] It is a simplification to describe the needs of refugees in terms of a shift from humanitarian to social integration needs. We refer mainly to the needs of the biggest share of the refugee population, who are people who came to Poland in the first half of 2022 and did not travel farther. However, refugees also arrived later; some decided to return or share their lives between Ukraine and Poland, traveling back and forth every couple of weeks or months, and others decided to go farther West. It should be stressed that individual-level humanitarian and integration-related needs were registered throughout the response. (See also: *Where We Are Now*, 14).

Moreover, there is an overlap between "humanitarian" and "integration-related". Similar activities may be conducted as part of both types of activities, but under different headings. The distinction between humanitarian and integrational should be made with reference to not only activity type, but also the general orientation of these activities. We can think of humanitarian aid as helping people to live in humane conditions anywhere. Humanitarian support travels as it should not become a permanent solution. Integration-related activities are tied to a specific society and state institutions. They aim to support people in becoming a part of a society and making this society accept them.
As already explained in the previous chapters, many representatives of local organizations believed that activities implemented as part of the Ukrainian response should also include audiences not directly affected by the war in Ukraine, e.g., migrants and refugees from other countries, or at-risk people of any background. Representatives of migration sector organizations often told their variant of "A tale of two borders" *(Grażyna Baranowska, A Tale of Two Borders: Poland's continued illegal actions at its border with Belarus, Verfassungsblog, 10 March 2022, https://verfassungsblog.de/a-tale-of-two-borders/ (accessed on 06.06.2024)*. The shift towards integration-related support at the later stages of the response made the focus on the Ukrainian refugees problematic. In Poland, there are various groups who live under the poverty threshold or are socially or economically excluded. Their needs overlap with those of the Ukrainian refugees.

	Emergency phase: 24th Feb 2022 to Autumn 2022	Stabilization: Autumn 2022 to Winter 2022/2023	Scaling down: From Spring 2023
Coordination	- With a few exceptions, existent coordination mechanisms related to providing support to migrants start supporting the response - Emergent coordination solutions from civil society and local governments to support organizing the response in its first weeks. - NGO Forum "Razem" is launched in March 2022 with the aim of providing a nation-wide coordination platform for local and international actors. - Work on the UNHCR Refugee Coordination Model (RCM) starts the same month. - Overall, coordination is insufficient in terms of mechanisms available as well as engagement of the main actors in the response. A clear outlier is the Lubelskie Social Aid Committee for Ukraine, in full operation from the first days of the response.	- NGO Forum "Razem" and the RCM have comparable numbers of registered participants and are the largest coordination structures in the response. In the case of the RCM, the domination of English in communication is the likely factor discouraging many local actors from participation. - Local coordination mechanisms such as Mapuj Pomoc's *Pomocna Kawa* (launched in September 2022) or Migration Consortium's quarterly Forum of Cooperation and Integration (first organized in May 2023) are in operation with the support of international financing	

	Emergency phase: 24th Feb 2022 to Autumn 2022	Stabilization: Autumn 2022 to Winter 2022/2023	Scaling down: From Spring 2023
Evolution of partnerships[53]	- Civil society and local governments emerge as key actors in the first weeks of the response. International actors arrive later and typically offer flexible financing with little to no reporting requirements. Similarly, business actors offer large, flexible grants to local actors. The first stage of cooperation between international and local actors is also marked by recognition of local actors' implementation capacities. No major criticism of partnership quality was voiced by the research participants with regard to this stage.	- Projects become longer term, partners are screened more carefully, and reporting swells. Project management requirements become greater. The imbalance of power in favor of international actors grows, with local actors having little say regarding contracting, reporting or monitoring requirements. Most local actors are unprepared for this change. - Partnership quality and international actors' exits emerge as topics in discussions between partners as well as in the public debate. - Relationships between partners are built mainly around the formal aspects of project management (compliance, reporting, monitoring). Little attention is devoted to fieldwork.	- International actors approach exiting with more or less planning. Those who develop exit strategies typically include a capacity-building offer for local partners in their strategies. - Local organizations realize funding is diminishing and develop their own plans for the future, largely independently of their partners' offers. Their main challenges include maintaining increased employment and scale of operations (or responsible shrinking), finding new funding sources, and achieving a balance between activities targeting Ukrainian refugees and those addressed to other groups.

[53] It should be stressed that international actors were better placed to observe the evolution of partnerships as they had not only more partners, but also more say in partnerships. It was easier for them to speak of "partnerships" in the plural or reflect on their partnerships in terms of their organizational policies. Local actors often simply spoke about their experiences, saying for instance that the first project with an INGO partner was easy, but the next one was fraught with challenges; or observing that capacity development offers strangely intensified in 2024 and supposing this change must be related to the near exit of their partners.
At the same time, the evolution of partnerships is heavily influenced by changes in funding mechanisms and the availability of funding. Both the LNGOs and international players believed that the main turning points in the response were related to types of funding available and the related administrative requirements.

	Emergency phase: 24th Feb 2022 to Autumn 2022	Stabilization: Autumn 2022 to Winter 2022/2023	Scaling down: From Spring 2023
Public language and policy context	- Consistent support to Ukrainians by politicians, civil society and business - By March, Ukrainian refugees have already been granted legal rights to stay, access to the labor market, key social services and transfers under the *Special Act*.	- Popular support for Ukrainian refugees decreases, but the more professionalized local humanitarian and civil society actors are ready for long-term engagement in the response[54]. - First cases of openly anti-Ukrainian rhetoric by public figures, including politicians.	- Compassion fatigue. Growing incidence of hate speech and hate crimes[55]. Anti-Ukrainian rhetoric audible during the parliamentary elections (15 Oct 2023)[56] and later central to the 2024 farmers' protests.

We divided the timeline into three periods, although this division is not equally relevant to every angle of our analysis. The division works best for analysis of the quality of partnerships as well as the public language and policy context of refugees' reception. Here, dwindling civic engagement coincides with the shift to more structured projects, and the growth of hostile public rhetoric occurs more or less at the time as the first exits of INGOs.

The timeline shows the challenges that local actors will have to tackle without support from international humanitarian actors (if no major changes in regional politics occur). The challenges include further work towards integration of Ukrainian refugees with less support from the public or politicians, or opposition to supporting the refugees at all. Such challenges are hardly new, especially for migration sector organizations. At the same time, they need to be tackled within the context of state institutions and in cooperation with them. Civil society organizations seem best predisposed to take on the role. Given the large numbers of refugees in Poland, an integration policy will be necessary to provide clear direction or a point of reference for the cooperation between the NGOs and public institutions.[57] The most interesting

[54] For more information on changing public attitudes towards Ukrainian refugees in Poland, see polls by Ipsos for Oko-press and Tok.fm. The research shows that between May 2022 and February 2024, the share of Poles believing long-term presence of Ukrainian refugees in Poland would be beneficial dropped from 77% to 45% . Piotr Pacewicz and Krystyna Garbicz, *Odwracamy się od Ukraińców. Niechęć młodych i kobiet. Zaciekłość Konfederatów*, OKO.press 01.03.2024, https://oko.press/odwracamy-sie-od-ukraincow-sondaz-ipsos# (accessed on 06.06.2024).

[55] Navigating narratives in Ukrainian humanitarian response amid solidarity and resistance.

[56] Ada Tymińska and Olga Świerkocka, *Ksenofobia i instrumentalizacja dyskursu wokół migracji. Wstępny raport z monitoringu mowy nienawiści w kampanii wyborczej*, Warsaw: Helsińska Fundacja Praw Człowieka 2023, Ksenofobia i instrumentalizacja dyskursu wokół migracji. Wstępny raport z monitoringu mowy nienawiści w kampanii wyborczej | Helsińska Fundacja Praw Człowieka (hfhr.pl) (accessed on 06.06.2024).

[57] See also: *Where We Are Now*, 31-33.

question related to the future of the response pertains to the role of the Ukrainian-led organizations. The fact that many of them have been strengthened by international partnerships creates an opportunity to root the policy-making process in the self-advocacy of this group. Another opportunity to vastly improve the inclusion of refugees in social life is to increase their direct participation in community life[58].

Yet another opportunity, this time for all categories of local actors, is to build strength through entering into international coalitions, take advantage of peer-to-peer exchanges between like-minded civil society organizations working on similar matters, and engage in transnational projects.

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[58] Wojcieh Gąsior & Łucja Krzyżanowska, *New Voices in the City: Refugee Participation in Warsaw, Gdynia, Wrocław, and Lublin*, Fundacja Stocznia 2023, https://pro.drc.ngo/resources/documents/new-voices-in-the-city-refugee-participation-in-warsaw-gdynia-wroclaw-and-lublin/ (accessed on 06.06.2024).

7. ANALYSIS OF PARTNERSHIP AGREEMENTS

This chapter focuses on an analysis of the agreements regulating partnerships between INGOs and local organizations. The analysis focuses on the question of equity and is conducted from a formal perspective: we are trying to understand if the legal interests of partners are equally protected by the composition and specific clauses of agreements . However, any party that wants to make use of clauses that protect them needs to have the capacities to do so. If a contractor does not have sufficient expertise or resources in their organization to consult a specialist, a fully equitable contract might be rendered unenforceable. Efforts directed towards formulating fair, exhaustive and unambiguous contracts may lead to the development of lengthy and hermetic documents. Those directed at shortening and simplifying agreements to make them accessible to all persons regardless of their legal training are likely to result in documents which are not specific enough to effectively regulate partnerships.

In this chapter, we provide more valuable information for proponents of regulation. We also believe that this stance is more relevant to the direction in which the humanitarian system has developed: the strongest players in the field have legal departments and do not compromise their legal interests. Therefore, our primary aim in this analysis has been to provide information allowing smaller actors to approach negotiations over contracts more assertively and achieve better protection of their legal interests through regulation.

It should be stressed that the INGOs that shared their partnership agreements for this analysis made efforts to ensure a decent level of legal protection for their partners. Their good will and the authentic efforts made for equity in partnership should be acknowledged, taking into consideration the fact that not every local partner has the capacity or is in the position to effectively negotiate more favorable provisions. At the same time, more can be done. We hope this chapter will be helpful in further work towards this goal.

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7.1. CONTEXT

The context for this analysis is the typical division of responsibilities related to developing the regulatory framework for partnerships. In every partnership discussed with the research participants, it was an international actor that provided a draft contract for a local partner. Local organizations could usually negotiate some elements of these contracts, but some of their representatives were critical of the negotiation process. They highlighted two major issues. Firstly, most provisions turned out to be non-negotiable. Secondly, representatives of international actors present at the negotiation table did not always have the decision-making power to introduce changes to agreements. Because the local organizations' requests had to be passed on to their supervisors, the chain of communication – as local actors saw it – often weakened their negotiation position.

It should also be noted that many local actors were not sure whether they could negotiate contract provisions at all and approached their first negotiations shyly. A few participants in our research said the legal documentation related to their projects was impossible to understand and they did not pay much attention to it once they understood the key matters related to budget and timelines.

Finally, smaller local actors that were not providing legal services to their target audiences, were unlikely to have lawyers among their regular staff. Not all of them would decide to consult a lawyer before signing an agreement. While scrutiny is needed on both sides to ensure proper legal protection for all parties of a contract, it is also understandable why it may sometimes be lacking. A lack of time or qualified personnel was a likely common factor among local organizations.

The fact that international actors took responsibility for the elaboration of contracts gave them an advantage in terms of securing their own legal interests but also brought clear benefits to local actors. Most importantly, it saved their time and did not require them to develop capacities necessary to prepare partnership agreements in the midst of the response. It is doubtful whether a different division of labor could be as effective.

It should be also stressed that INGOs were not entirely free to propose the legal framework for their partnerships with local organizations as they were bound by the requirements of their back donors (entities that finance international actors). In the analysis below, we have tried to focus on the matters that the INGOs could reasonably influence.

7.2. SAMPLE

We invited the 13 international organizations contributing to this study to share contracting documentation, which 6 of them did. All of these were INGOs. Three shared with us more than one set of documents from different phases, thus allowing for some insight into the evolution of agreements between 2022 and 2024. We do not treat the sample as representative as the actual number of agreements signed during the two years of the response is obviously much higher (even if many of the agreements are similarly formulated). This analysis can provide information only of a limited scope, particularly regarding examples of good practices to replicate, and regulations to avoid if partnerships are to be equitable.

The nine sets of documents included in the analysis are composed of one agreement with annexes. Annexes may include general conditions, budget, gender tipsheets, a logframe, risk matrix, standards relevant to the project, logistics, administrative and financial procedures and guidelines, report templates, visibility and communication guidelines, a code of conduct, teaming agreements, a scope of work, a work plan, a monitoring and evaluation plan, external screening forms, data processing agreements, and audit ToR. These sets of documents are sometimes longer than one hundred pages, which also gives an idea of how much work thorough regulation requires.

Criteria of analysis

The contracts were screened against the five criteria outlined below:

- Completeness (or its lack), by which we understand the presence of documents regulating partners' cooperation or the terms of partnership modification or termination. For instance, if an agreement may be terminated when a partner fails to adhere to a code of conduct, this code of conduct should be annexed to the contract.
- Clarity (or its lack), by which we understand the absence of vague provisions.
- Equity (or a lack thereof), by which we understand equitable provisions that regulate disputes, terms of modification or the termination of an agreement; also cooperative approaches to elaborating parts of the contract which have an impact on the aforementioned issues.
- Availability in local languages (or lack thereof), by which we understand mainly Polish and Ukrainian. While many leaders of the Ukrainian-led organizations had very good Polish-language skills, this was not always the case. No requests for translations into languages other than these two were voiced by the research participants.
- Consequences for workload, with the focus on reporting and monitoring and evaluation requirements.

These criteria were elaborated in dialogue with the research participants' observations on partnerships that were shared in the interviews, as well as in the localization framework. "Completeness" and "clarity" refer to the expectation, voiced mainly by local actors, that their

international partners have less space for arbitrary decisions. “Equity” is a criterion formulated in response to concerns over asymmetries of power in these local–international relationships. “Availability in local languages” and “consequences for workload” refer to the Grand Bargain Commitments and its operationalization by the NEAR framework.

7.3. FINDINGS OVERVIEW

The main findings are ordered according to the above criteria.

7.3.1. COMPLETENESS

It is clear that achieving completeness of the agreements was one of the chief concerns of the INGOs which shared the documents for analysis. This is confirmed by the fact that five out of the six organizations fully met the expectation of clearly defining the clauses related to conduct, PSEA, anti-fraud, anti-bribery, anti-corruption, anti-money laundering, anti-terrorism financing, safeguarding, modern slavery, human trafficking, as well as misconduct cases related to fraud and corruption. Moreover, four INGOs included comprehensive data protection regulations in the annexes right at the beginning of the response. These organizations supported the agreements with links to the published policies and procedures, or they annexed the documents to the agreements.

Another good practice noticed with regard to four of the agreements was the inclusion of sections with contact details of significant persons and other persons responsible for a given project (representing both parties). Additionally, a cover note was added to one of these agreements, clearly informing who the partners should reach out to in case of questions on the package, thus making the partnership more human .

Overall, the agreements were strongest from the point of view of the completeness criterion with regard to the risk of the reliability of local partners (e.g., gross violations of humanitarian standards or embezzlement). If we look at the agreements from the perspective of local partners who are dedicated to high standards of implementation and are already familiar with the high Polish and EU data protection standards, some improvement is possible.

- Most agreements mention that financial tranches are conditioned on a partner's performance but lack a section detailing **expectations regarding their performance**. While overregulation of this aspect of partnerships might negatively impact a project’s implementation, missing information is likely to put local organizations at a disadvantage if any controversy over their performance arises.
- **A risk matrix** was not annexed to any of the contracts, which would be helpful to both partners in the event that a project turns out to be impossible to implement.

- All the analyzed agreements, except for one INGO's, lack any reference to the **fund management** that is the basis of the agreement, including assessing the required capacity of the partner to fulfill their obligations.
- Some agreements lack a **log-frame** section or annex that explicitly outlines the outputs and outcomes of the project, or provisions specifying how outputs and outcomes will be defined and under what conditions they can be modified. Only one INGO included comprehensive monitoring tools as an annex to the agreement. Since monitoring and evaluation were highlighted as challenging activities in many partnerships by both the local and the international partners, their better regulation in contracts might be helpful for both these types of organizations.
- **Timelines** and information on how they would be elaborated and approved are not always included in contracts, while every contract refers to timeliness. Overcoming this lack would prevent partners from arbitrary interpretations.

7.3.2. CLARITY

Most provisions of the analyzed contracts are clear: they are specific and unambiguous. For instance, **provisions related to costs eligibility** (criteria for eligible costs, including %, thresholds of budget lines excess, staff costs, travel and subsistence, flat-rate reimbursements, equipment and supplies, consumables, subcontracting conditions and expenditures, costs deriving directly from the requirements of the agreement, taxation, and support costs) tended to be clear and comprehensive. Ineligible costs were usually detailed with less scrutiny. In one case, examples of disallowed costs were provided and the agreement also specified the procedure by which such expenses would be tackled.

Space for improvement in the contracts can be suggested based on the good practices that were identified as outliers (i.e., in only one contract). The fact that such solutions were employed shows they are, most likely, possible for other organizations to replicate:

- Only one INGO shared an agreement with clearly defined overhead costs, including a section with guidance on utilization of overheads. This INGO introduced these changes in their 2024 agreement (in the 2022 agreement shared for the purposes of the study, the provisions were lacking), possibly in response to the Voluntary Guidelines[59].
- Most of the agreements lack specific details concerning the percentage of the total budget covered by the funding agency. Only one NGO clearly presented information on partners' contributions.
- Nearly all INGOs stressed that upstream compliance requirements largely influenced their freedom to modify contracts. However, only one INGO transparently described their donors' regulations in the contract with their local partner. More reference to

[59] NGO Forum "Razem", *Voluntary Guidelines on the nature of contractual partnerships*, Relief Web, 30 October 2023, https://reliefweb.int/report/poland/voluntary-guidelines-nature-contractual-partnerships (accessed on 2.06.2024), point 4.1.

these regulations would facilitate better understanding of the financing mechanisms of INGOs from the start of a partnership.

- It is not always clear from the agreements which regulations ensure transparency in financial matters.
- Two organizations provided a comprehensive table detailing the required Appropriate Supporting Documentation.

7.3.3. EQUITY

The contracts included in the analysis were evaluated most critically for equity. We focused on provisions related to disputes and contract termination, as well as the language of the contracts. We tried to highlight matters that seemed to be least related to the requirements of back donors and should be possible for INGOs to change . The main points of our analysis concern:

- **Governing law**: Only half of the organizations who shared their agreements refer to Polish Law as the governing law. Reference to laws other than Polish ones makes it much more costly (if possible at all) for local partners to enter into litigation if they find legitimate reason for such a step. Both partners have the same actual chance of a fair trial, and there seem to be no reasonable obstacles to choosing Polish law as the governing law.
- **Terms of termination:** Agreements varied with regards to the termination clauses: from a very horizontal approach (allowing either party to terminate the agreements on comparable terms) to a clear imbalance of power (e.g., allowing the INGO to terminate agreements "at [their] convenience").
- **Risk matrix**: The contracts lacked risk matrices, which could be helpful when changes to the project need to be transparently negotiated.
- **Language**: Terminology like "subrecipient" and "subawardee" can be replaced with the term "partner" in some agreements, in line with the *Voluntary Guidelines*[60], which state that "INGOs and L/NNGOs entering a contractual partnership are invited to depart from seeing each other as "donors" and "implementers" but rather as equal partners who bring their unique assets into the relationship for the benefit of the affected populations".
- **Response to the *Open Letter to International Donors***: Only one INGO agreement had been adapted to account for the additional contingency month requested by the local organization in the *Open Letter*[61].

[60] *Ibid.*

[61] *Ibid.*, point 3.4 Risk Sharing: At the kick-off of the contractual partnership, the partners should mitigate the potential financial risks of implementing the project and come up with possible solutions for ensuring the cash flow within the partnership, which would share the risk between the INGO and L/NNGO partners. The solutions to consider are: including a 1 month buffer in the agreements to allow for delays in funding, without it affecting the start and end dates of a project, commitment to the release of 25% of the first installment in the first weeks of the project, a credit guarantee for a bank, postponed financial reporting, advanced payment on top of what is delayed or connected with the project.

7.3.4. AVAILABILITY IN LOCAL LANGUAGES

Of the six agreements reviewed, three were bilingual and three English. Three translations were made from English into Polish, including an agreement with a Ukrainian-led organization. It should be stressed that in the interviews some local actors stated that the prevalence of English in communication with their international partners was a significant barrier to them expressing their concerns or delivering quality documentation.

7.3.5. CONSEQUENCES FOR WORKLOAD

The provisions of each agreement obviously impact the workload. Bearing in mind the localization principles related to lessening administrative burdens on local actors as well as the requirements of transparency and reliable project documentation, we propose that two questions should be considered by international actors concerned with harmonization.

The reporting requirements of INGOs varied greatly from agreement to agreement. In two cases, they were very strict and, in our judgment, represented at least one full-time workload. In two others, they were so lax that it is doubtful whether projects would eventually be properly documented[62]. Striking a balance between reliable documentation and reasonable workload may be easier if INGOs share their experiences. Reporting requirements should also be considered for harmonization between organizations: similar reporting frequency and reporting templates might make it easier for local actors to provide quality input.

Two out of the 6 INGOs had very strict reporting requirements and especially lengthy administrative standards, but others seem to have very lax requirements, which is also concerning (reference to point 5.3 of the Voluntary Guidance). Reporting varies from one organization to the next. One suggestion is that all INGOs should agree on the volume of reporting based on the project duration and value thresholds (I don't think the risk level of the partner should be added as this is just another layer of complication).

Another requirement which should be considered for harmonization is the recordkeeping timeline, which currently varies between projects and organizations.

[62] See: reference to point 5.3 of the *Voluntary Guidelines*

7.3.6. EVOLUTION OF AGREEMENTS

Only three partners submitted more than one set of agreements, including one from the beginning and one from the current phase of the response (year 2024). Based on a comparison of contracts from different stages, three INGOs made significant efforts to enhance the specificity of the agreements and their adaptation to the local context. These efforts included changing the governing law to Polish, providing a definition of overhead costs, adding the contingency months (requested in the *Open Letter*), and ensuring a Polish language translation. The evolution of these agreements most likely shows the impact of the NGO Forum's Partnership Working Group and the *Voluntary Guidelines* in promoting good partnership models.

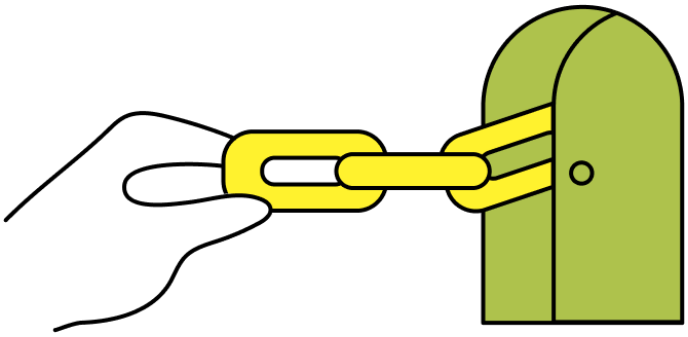
7.4. CONCLUSIONS

The documents submitted for analysis were assessed as strongest in relation to the criteria of completeness and clarity. Equity and availability in local languages are areas where more could have been achieved. Here, local partners were typically at a disadvantage with regard to disputes resolution and terms of termination as well as accessibility of contracts in their languages. Our observations are least conclusive with regard to the impact of contractual provisions on reporting. However, some extent of harmonization in the reporting and record-keeping requirements should be considered. Local organizations enter into partnerships with various organizations, sometimes at the same time. Comparable requirements in terms of the reporting frequency, types of data to be collected and record keeping would allow for more unified internal processes. In the case of actors with little experience in reporting, more unified requirements would also allow them to master the tools faster and could be used for more than one partnership. We present more detailed recommendations in the last chapter of this report.

It should be stressed that many good practices have been noticed in this analysis and it seems only reasonable to encourage INGOs to exchange their experiences and expertise in contracting to strengthen each other's documentation. Publishing contracts could be the first step in allowing these organizations to draw inspiration from one another's legal solutions. However, collaboration in working groups (such as the Partnership Working Group) or other similar bodies is also recommended for future harmonization efforts.

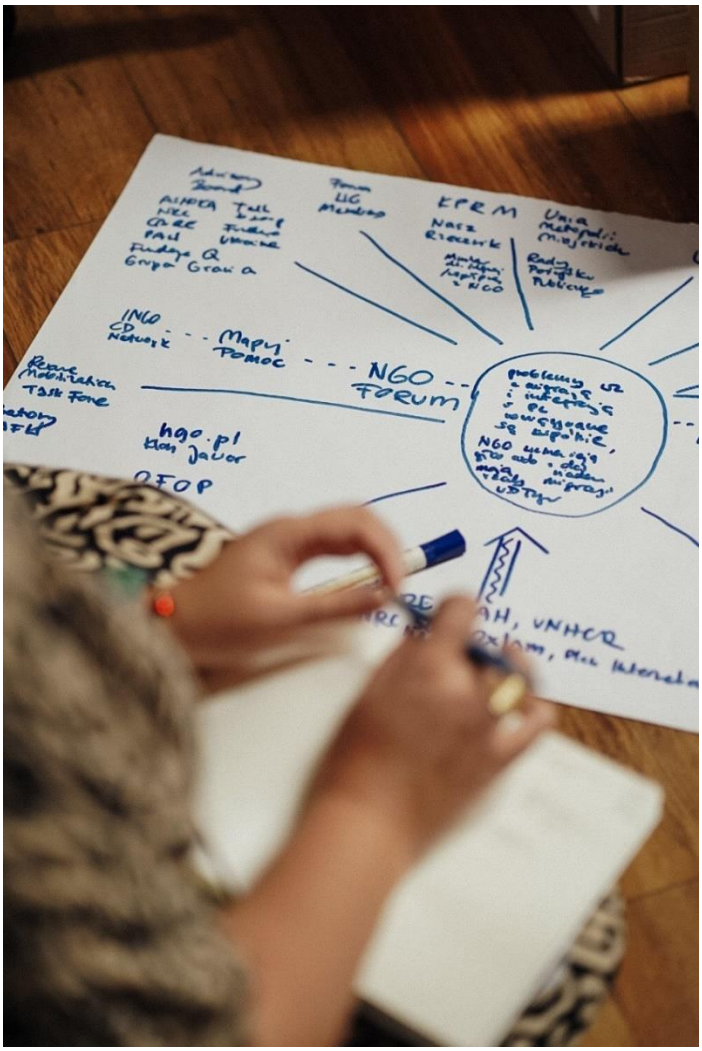
At the same time, once again it should be stressed that some of the local organizations lack in-house legal expertise or sufficient experience with legal provisions. Their funds may also be too limited to hire a consultant to help them review a contract and decide whether it serves their organization's goals. Such organizations may give up dealing with lengthy agreements and annexed standards, or they might even overlook some of their responsibilities because their main focus remains in the field. Varied interpretations can also arise from differences in organizational management approaches or prior experience with funding institutions. To mitigate these challenges, meetings regarding the planned collaboration should be organized

before signing the partnerships as an opportunity for partners to align their understandings of the contractual provisions and discuss examples of situations where they would be applicable. As Section 3.8 of the Voluntary Guidelines recommends: “At the start of the project, a kick-off meeting will foster mutual understanding, also among the NGOs’ teams." Let us add to this recommendation that these meetings should be fully accessible to non-English speakers.



8. THE GRAND BARGAIN COMMITMENTS

This chapter focuses on four of the Grand Bargain commitments and aims to assess the degree to which they have been fulfilled by the international actors. The main analytical tool employed in this chapter is the NEAR localization framework. Since not all of the elements of this framework have proven to be relevant in the context of the Ukrainian response in Poland, the analysis focuses on selected indicators and is supplemented by additional observations regarding the realization of commitments.



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Achievement of the NEAR framework KPIs is measured on a 4-point scale:

4 - full achievement of the indicator

3 - partial achievement, whereby efforts to fulfill the commitment were clearly made but the results have not been fully achieved

2 - partial achievement, whereby few efforts to fulfill the commitment nevertheless led to some positive results

1 - the indicator has not been achieved (even partly)

This scale rewards effort rather than results as we acknowledge that genuine work towards supporting local actors may not always end up in success. At the same time, success without such work may still be possible thanks to favorable circumstances or local actors' own work.

Some discrepancies arise between high scores and our comments concerning bad practices – analyzed as such by the research team; therefore, these good scores do not systematically translate into a high satisfaction level for representatives of local organizations. One reason for this discrepancy might be what one L/NNGO representative stressed in her interview:

> *These localization requirements are fine, but they lack the element that creates a common language – a common commitment – and not simply an obligation of international partners. (L/NNGO, Fund distributor and facilitator)*

Localization is a one-sided idea to the degree that some of the local organizations we invited to take part in the study did not know this term.

Whenever relevant, we highlight differences between the perspectives of INGOs, UN agencies and various types of L/NNGOs. Such differences are typically reported under "outliers".
Once again, it should be stressed that the study focuses on relationships between international actors and L/NNGOs. Other types of local actors, e.g., local governments, are not covered by this study.

This chapter is divided into four parts, with each related to one of the core commitments of the Grand Bargain. We start with an analysis of the research results using the NEAR localization framework and later discuss observations which could shed additional light on the localization dynamics.

8.1. LEVEL OF REALIZATION OF CORE COMMITMENT 2.1: TO INCREASE AND SUPPORT MULTI-YEAR INVESTMENTS IN THE INSTITUTIONAL CAPACITIES OF LOCAL AND NATIONAL RESPONDERS, INCLUDING PREPAREDNESS, RESPONSE AND COORDINATION.

Core Commitment 2.1 encourages multi-year investments in preparedness, response, and coordination. The first challenge for Poland arising from its application is the term "multi-year". We are only two years into the response and the first international actors have already exited. Can "multi-year" reasonably mean two or three years? Moreover, how should commitment be reformulated if the need for humanitarian aid diminishes early in the response? The starting point of our analysis must necessarily begin with recognition of the fact that many of the international actors have not had an opportunity to invest in the development of any of the local actors for a period longer than three years because this is the third year of the response and exits have already started. Similar reservations can be made with regard to a complementary KPI, "availability of multi-year financing for preparedness, stability and quality", which is analyzed under commitment 2.4, which is related to funding for L/NNGOs (see below, part 4). Considering what seems to be the relatively brief cycle of the intervention in Poland, we assume that 2 years is enough to classify efforts to strengthen partners as mirroring the spirit of the core commitments in the Polish case.

Based on the data collected for this study, the most relevant NEAR framework KPIs that measure realization of the commitments in Poland include (1) Organizational development as a core objective of partnerships; (2) Routine use of capacity assessments; (3) contextualization and availability of standards in the local language; (4) INGO/UN support for L/NNGO growth mechanisms. Our main question is whether the international actors involved in the Ukrainian response contributed to these KPIs being achieved in the last two years.

8.1.1. ORGANIZATIONAL DEVELOPMENT AS A CORE OBJECTIVE OF PARTNERSHIPS

Level of achievement: 3

Justification

8.1.1.1. Timing

Prior to the Russian invasion of Ukraine, Poland had not been subject to any major humanitarian intervention. International humanitarian actors, mainly UN agencies (mentioned in the Situation Analysis), had small teams in local offices, with few to no response projects. As the war in Ukraine escalated in 2022 and thousands of refugees started crossing the Polish border,

these actors scrambled to increase their own capacities in terms of human resources and field operations.

Prior to 2022, these international actors contributed to developing the capacities of Polish public functionaries in, among others, migration management, human trafficking, undocumented persons and refugee rights. The impact of this work, e.g., IOM activities focused on capacitating Border Guards in the prevention of human trafficking or SGBV[63] on Poland's preparedness for the 2022 crisis is hard to measure, but it should be stressed that the topics of seminars and training sessions corresponded to the emerging needs during the first phase of the response.

After 24th of February 2022, international actors directed their energy towards the emergency response. Even when their programs entailed building partnerships with local actors, they almost completely lacked organizational development components. As the emergency response phase was reaching an end, the international agencies had already built their teams and were able to move on to more structured due diligence and compliance mechanisms. Only then did organizational development initiatives start emerging on a larger scale.

It should be asked whether conditions during the emergency phase were at all favorable for the development of local actors. Nonetheless, some of the local actors engaged at the border mentioned that in the first weeks of the response they did not have sufficient knowledge on human trafficking and relied on information shared through informal networks, e.g., information about suspicious transportation offers. Even if the international actors had aimed to respond to these needs, the later scheme of operations, in which a partnership is signed and the partner's capacities are assessed before any support of organizational development can be offered, would have been unlikely to work well in these conditions.

> *When I saw the first photos from the border, showing two refugee women standing with a sign reading "Warsaw" it was terrifying for me. While others saw solidarity, dedication, and a willingness to help, I saw something different. I was frozen with worry, thinking: where are these women going? Who will pick them up? Will they be safe? Quickly, I began to speak out loudly about the safety of Ukrainian refugee women. The next day, we prepared leaflets in Ukrainian, which the border guards placed in women's passports during passport control, detailing what to do and who to call if they felt unsafe. (L/NNGO, Migration sector organizations)*

It is also unclear whether the international actors, focused on scaling up or launching their activities and still unfamiliar with the Polish context, believed they had much to offer the local organizations which were already delivering aid. A number of INGO representatives stressed the importance of local partners for their own ability to scale up operations. It seems that, at

[63] More information about these projects: https://poland.iom.int/pl/wspolpraca-i-kompetencja-kluczem-do-skutecznej-walki-z-handlem-ludzmi, https://poland.iom.int/pl/protect (both accessed on 02.06.2024).

first, local organizations were assumed to be partners who already had the relevant capacities rather than partners who needed to develop. This position in the local–international partnerships was about to change.

8. 1.1.2. Capacity development as a standard requirement & duplication

Some INGOs tailored their organizational development initiatives to the individual needs of each partner, focusing on filling the gaps identified during the due diligence process or emerging during partnerships. This involved providing the tools, resources, and operational support necessary for the effective functioning of their partners. Some international organizations allocated a budget for their local partners to spend at their own discretion in case they did not want to take part in some of the proposed activities.

> *When our partners expressed disinterest in our training offerings, we provided them with funds instead. We would say, 'If you want to pursue training, here's a budget of 4,000 euros; choose the training that best suits your needs. They opted to send their staff to international training programs. Whenever possible, we strive to give them the autonomy to choose the type of training that fits within their budget. (INGO)*
>
> *We also took part in training, but we also got money to think up what training we needed, which was even better. (L/NNGO, Migration sector organizations)*

These efforts should be highlighted as good practice, but were by no means standard.

Many local actors said taking part in training was a requirement but was not necessarily based on their requests or dialogue regarding their development needs. In some cases, they were required to take part in an activity even though they had just completed a similar one with another international partner. One L/NNGO research participant reported that their project team was required to take part in 12 days of training for a project that was shorter than 9 months.

> *Undergoing the same training at a basic level over and over again with every organization… It was unbelievable, there was a lot of wasted time (L/NNGO, Migration sector)*

The fact that one INGO approached organizational development with little flexibility made it more difficult for other such organizations to be credible when trying to enter into authentic dialogue:

> *There also seems to be a lack of understanding about the reasons behind our methodologies and approaches. Indeed, when considering international policies, they (LNGOs' representatives) often feel that adhering to core humanitarian standards or*

minimum child protection standards, which we've translated and attempted to contextualize, doesn't add value for them. This resistance may stem from a perception that these standards impose an international framework that clashes with their local culture. (INGO)

8.1.1.3. Organizational development as adaptation to the international humanitarian system

The vast majority of development activities are aimed at strengthening the L/NNGOs in building partnerships with international actors (such as peer-to-peer administrative support in procurement processes, financial management, and data security and privacy management). This general orientation of capacity development was beneficial for organizations that wanted to become humanitarian players or, at least, to be able to compete with them for the same sources of funding. It should be stressed that a number of organizations achieved this objective and, in the third year of the response, were able to win funding for which INGOs also applied. Training, workshops and support in developing internal policies also facilitated the protection of beneficiaries through the dissemination of important humanitarian standards (such as PSEA, safeguarding, or inclusion).

They trained us in humanitarian standards, for which we are very grateful, and they helped us a lot in thinking more broadly. (L/NNGO, Migration sector organizations)

Nonetheless, this path of development was not attractive to all L/NNGOs as it did not respond to their long-term concerns (e.g., economic sustainability, strategic development, HR management, etc.). Realizing that the humanitarian actors would eventually exit, they were looking for non-humanitarian public or private funding opportunities in Poland or abroad. Most of these plans were formulated on the basis of experiences of partnerships rather than the results of the organizational development activities, which had not been crafted for the new contexts.

Finally the Grand Bargain Commitment 2.1 specifies that capacity-sharing efforts should focus on preparedness, response and coordination. The training and workshop topics mentioned by the local actors focused primarily on administrative matters and response. Preparedness and coordination were reported far less often, if at all.

Outliers:

- A noteworthy outlier to these observations is the INGO participants of this study whose organizational development offer in the later phases of the response was incorporated into their exit strategy. These organizations offered, for instance, activities focused on

increasing L/NNGOs' capacities in mapping funding opportunities, identifying those suitable for their profile, and preparing strong applications.

8.1.1.4. Prevalence of training as a capacity-building method

Some INGOs employed lessons learnt from other contexts in their organizational development efforts. For instance, they offered their partners other forms of capacity development rather than training, especially peer-to-peer support or job shadowing. This approach not only contributed to developing the capacities of local actors, but also saved time as they were getting their work done and developing their skills and knowledge at the same time. While training may be an adequate method for some forms of capacity development, it is time-consuming and in some cases insufficiently tailored to the division of tasks in organizations (the same material is taught to all trainees). An example may be the requirements of all project staff to participate jointly in training sessions lasting 12 days, which made the team unable to work on the project during that time. Training belonged to the most widely used capacity development tools reported by the local actors contributing to this study.

8.1.1.5. Short term projects have the least impact on capacity development

While the training and peer-to-peer approaches do both benefit local partners, short-term projects have only limited impact. For example, one capacity-building result widely reported by L/NNGOs was the establishment of policies and procedures. Without the opportunity to implement these P&P in practice (e.g., in procurement or on the ground), they remain theoretical. Long-term projects, on the other hand, allow for an adequate capacity-building process, starting with a thorough needs assessment and following a tailored developmental plan.

> *Short-term projects, lasting only a few months, did not bring long-term results (L/NNGO, Protection sector)*

8.1.1.6. Scarcity of capacity sharing

All the interviewed international actors offered capacity building to local organizations, but few of them decided to ask local actors to help them develop as organizations. In the report, we cite three cases in which a local organization delivered a capacity-building activity to an INGO or was employed by the INGO to capacitate other local actors.

Capacity sharing rooted in dialogue regarding development needs seems to be most recommendable for ambitious localization agendas because INGOs, despite their organizational maturity, are not organizational development professionals. Unless they follow this path of development (as suggested by an INGO research participant), they should also realize their limitations and the capacity development needed to support the development of other actors.

8.1.2. CAPACITY ASSESSMENTS ARE ROUTINELY USED

Level of achievement: 3

Justification

The Ukrainian response has deeply affected the funding and program implementation capacities of L/NNGOs. While it has brought an influx of funds and international attention, it has also strained the operational capacities of these organizations, necessitating rapid scaling up and adaptability to the increased demands, in addition to the strain caused by the complexities of international funding and coordination mechanisms. For these reasons, capacity assessments were or (in other cases) should have been an important tool in strengthening local actors.

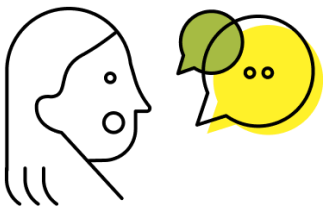
The KPI has not been assessed as fully achieved as local actors did not always realize the capacity assessment function of due diligence. We also stress the asymmetry of assessments in partnerships (only local actors' capacities are routinely assessed), which makes it difficult for the idea of capacity sharing to take root in partnerships. Finally, we highlight the good practice of less formalized and more dialogical exchanges regarding what kind of capacities would be needed or recommended for each of the partners.

8.1.2.1. Few L/NNGOs realized the capacity assessment function of due diligence procedures

Capacity assessments were routinely done, but typically only at the stage of due diligence. They were not always repeated, which may have impacted reliable capacity development monitoring in some cases. Moreover, not all of the local actors realized the capacity assessment function of due diligence. This may have affected the best efforts of the INGOs to provide tailored capacity building.

Another challenge related to capacity assessments is that the organizational development offer did not always match the results of these assessments, or the assessments were too general to allow for an adjustment of this offer.

> *Some organizations conducted assessments to determine our needs, which we identified for them. However, the quality of the training provided often did not adequately meet those needs. (L/NNGO, Protection sector)*



8.1.2.2. Dialogue instead of standardized assessments

Some of the international partners simply asked their partners what kind of development support they would be needing, which seems to be a capacity assessment method that is better suited to building equitable partnerships. This should be highlighted as good practice in partnerships.

However, in other cases local organizations sought development support from their partners and did not receive it.

> *For a year we asked one organization for a training list that could be useful for our team based on their experience in such situations, but we never received it. We needed such guidance to know what is worth paying attention to in general (L/NNGO, Roma-led organization)*

8.1.2.3. The one-sidedness of capacity assessments

It should be also observed that international actors do not undergo capacity assessments by local organizations. This asymmetry shows that the idea of capacity sharing has not been embedded in the international actors' partnership-building practices.

We did not come across any cases of a local actor inviting their international partner to take part in a capacity assessment. However, in 5 cases an L/NNGO pointed out flaws in INGO and UN procedures. Only two international partners invited an L/NNGO to capacitate them.

8.1.3. STANDARDS ARE CONTEXTUALIZED AND AVAILABLE IN THE LOCAL LANGUAGE

Level of achievement: 2

Justification

One recurring comment from L/NNGOs about their international partners during the emergency phase was their lack of knowledge of the Polish context and their tendency to refer to previous experiences from contexts often characterized by the fragility of state or democratic institutions. Indeed, the vast majority of humanitarian standards have been developed from and in the context of weak governance. For these reasons, the standards needed thoughtful contextualization in Poland. This lack is at the heart of many of the difficulties of communication and mutual understanding between L/NNGOs and international actors in Poland.

You can say that it is a problem because they do not understand the local context here. (L/NNGO, diasporal and minorities organizations)

These organizations were working for the first time in an EU country and they were completely unable to cope with the fact that they had a different context in the very engaged civil society and very strong L/NNGOs, and they were unable to adapt to this situation. (L/NNGO, diasporal and minorities organizations)

8.1.3.1. Too little reference to locally binding (local, EU or Schengen area) legal standards

Many local actors highlighted that the fact that standards proposed for implementation by local organizations as part of their capacity development overlapped with many legal requirements their organizations had to comply with anyway, especially legislation related to child protection or GDPR. For the local actors, this overlap meant not only that the standards they adhered to were not recognized as valid, but also that these were local actors that were expected to align their humanitarian standards with the Polish context.

Another organization was looking for a local partner to distribute food vouchers or something similar and to take fingerprints from those who received these vouchers. For us, this was completely absurd because taking fingerprints is illegal; we can't do it. This highlights the importance of understanding the context, namely GDPR, which is an EU-wide regulation. (L/NNGO, Migration sector organizations)

At the same time, from the perspective of INGOs, local actors had a tendency to perceive local legislation as more stringent and as regulating more aspects of implementation than a reasonable interpretation of these regulations would suggest. GDPR was an example.

8.1.3.2. Domination of English in the coordination and documentation of activities

The issue of language was important from the very beginning of the emergency phase, leading to exclusion of entities lacking English-speaking capacities from some of the prospective partnerships and coordination meetings, or to these entities' dependency on larger organizations with English-speaking capacities. Since then, efforts have been invested in coordination with the provision of translation facilities and, in some cases, coordination meetings taking place in Polish with translation into English.

Many organizations send people who do not know the context and do not know the language; many smaller organizations did not have a chance to communicate with them at all (L/NNGO, Migration sector organizations)

I understand that these are international organizations, but I am one of the few people in the foundation who speaks fluent English, which caused a huge workload for me (L/NNGO, Migration sector)

8.1.3.3. Too little knowledge about the humanitarian principles

L/NNGO staff had little knowledge about humanitarian principles and references during the emergency phase. Some breaches/discussions occurred around the principle of neutrality, in particular from Ukrainian and Polish staff towards Russian-speaking or Roma refugees.
Outliers:

- The 2018 edition of the Sphere Standards is available in Polish and the previous version (2011) is also available in Ukrainian. While the mere availability of standards in local languages does not make them relevant to the local context, it facilitates discussion over their relevance and for this reason should be highlighted as an example of good practice.
- Polish humanitarian organizations were already familiar with the humanitarian standards and models, and their expectations regarding contextualization were far lower than those of most CSOs. These organizations were also familiar with typical large-scale humanitarian projects (e.g., cash projects) and were ready to temporarily upscale to implement them in various locations. Having less ties to one place and one sort of audience also made them more understanding of the decontextualized models and standards as this decontextualization allowed for their application in different contexts. Nonetheless, some criticism of insufficient effort in understanding the Polish context was also voiced by their representatives:

  Initially, it was evident in our coordination efforts that international organizations were simply allocating whatever staff they had available, who often arrived with little knowledge of our specific context. They might have been accustomed to operations in places like Somalia and were applying the same approaches and questions here in the EU, which wasn't always appropriate. (Polish humanitarian organization)

8.1.3.4. Overall positive results of INGOs' employment of local staff

As one INGO representative put it, Shifting to nationalization of staff helped decrease frustration, including the language barrier and changes of international staff. Employment of local staff has not been assessed as unequivocally beneficial for the quality of partnerships, but this step diminished barriers related to language or misunderstandings over the interpretation of standards or regulatory documents.

Shifting to hiring local staff helped reduce frustration, especially related to the language barrier. (L/NNGO, Protection sector)

8.1.4. INGO/UN SUPPORT FOR LOCAL ACTORS' GROWTH MECHANISMS

Level of achievement: 2

Justification

8.1.4.1. Civil society support growth in the emergency phase

At the very beginning, only local municipalities (tasked by the central government), grassroots and local organizations responded by providing support to the majority of the refugees. It is important to recognise that the first "growth mechanism" came from local civil society rather than any other source.

> *At the beginning, only local municipalities, grassroots, and local organizations responded, providing support to the majority of refugees. (L/NNGO, Migration sector)*

8.1.4.2. Professional growth support for local actors

Later, professional growth capacity (humanitarian professionals) actors from INGOs/UN came to support some Polish humanitarian and international organizations. Some of the non-humanitarian organizations, including grassroots organizations, received support from volunteers abroad. Among them were professionals who provided advice about preventing human trafficking or providing psychological support. Other volunteers without professional backgrounds also participated in the response, together with Polish volunteers.

8.1.4.3. International networks between CSOs

A few research participants said that their growth capacity was supported by citizen-led initiatives from Greece, US or Germany embedded in L/NNGOs.

> *There was a group of Greek volunteers who came to help. They had extensive experience in migration and dealing with international organizations. They advised us to collect data and write reports, even though our partners were only asking us to act without documenting these efforts. Three months later, other organizations started to offer us more resources, provided we could demonstrate what we had done with the initial ones. It turned out that the Greek advice was invaluable, enabling us to continue these partnerships. (L/NNGO, Migration sector organizations)*

8.1.5. ADDITIONAL OBSERVATIONS

Considering the humanitarian cycle, multi-year investments in the development of institutional capacities is an ambitious commitment. When would we consider it to be fully realized?

Firstly, we believe that **recognition of local capacities** lies at the heart of the commitment and that any capacity development should build on local actors' strengths rather than their weaknesses. Local actors involved in the Ukrainian response in Poland proved that they were capable of identifying needs accurately and delivering aid swiftly. As many of them were engaged in such a response for the first time, they probably did not fully realize the capacities they had. It seems the later capacities assessments that some of these actors participated in did not allow them to realize their strengths. Instead, their international partners pointed to their weaknesses and further development was determined by what was wrong with them rather than by what was right.

> *The international organizations that came to Poland often perceive themselves as having the expertise to act immediately and with full confidence. However, that's not true. An international expat coming to Poland does not know who to trust, what it is like to work here, or that labor laws regulate things which, in other countries, humanitarian organizations manage with their internal procedures. They need to learn this. (L/NNGO, Funds, fund distributors and facilitators)*
>
> *If the staff comes from Poland, it is a different type of work because they understand the current context, they understand the political context, they know what can be done and what cannot be done. (L/NNGO, Migration sector)*

Secondly, the idea of **tailoring capacity** development requires dialogue regarding capacities in partnerships. Standardized assessments may be too arbitrary for this purpose as these tools tend to predetermine what should be subject to discussion, e.g., development objectives (standardized assessments tend to assume that the general objective of local actors is to be more like the global players) or the time horizon of capacity building (assessments may tend to focus on needs related to the response or ongoing partnerships).

> *A small organization means that it cannot do everything, - it can do less rather than more; on the other hand, it also makes decisions very quickly, almost immediately, and this is also something that we, when expanding the organization, did not want to lose. (L/NNGO, Migration sector)*

Additionally, some L/NNGOs expressed concerns about their growing responsibility in light of the uncertain duration of the funding, which affected their planning and expansion decisions. This indicates the need for **more predictable multi-year funding mechanisms**. At the same time, such mechanisms should be accompanied by guidance on the humanitarian cycle:

> *For us, this was the first crisis, and we really lacked the foresight to anticipate its dynamics. We didn't have a roadmap to understand that, initially, many people would come, many donors would show up, and there would be a lot of money. We were unaware of how long the crisis would last and what would happen next. (L/NNGO, Organizations targeting children and youth at risk through protection and education)*

Lastly, the international actors made **authentic efforts to strengthen their local partners**, but these were not always successfully communicated. One of the INGOs delegated staff to support their local partner, which did not realize this was a form of capacity support. Complicated bureaucracies, strict compliance requirements, and a lack of preparedness to meet international humanitarian standards are the most common challenges faced by local and national responders in accessing and utilizing multi-year investments for capacity building. Support from INGOs, including training, peer-to-peer support, and direct funding (as mentioned previously) has been instrumental in overcoming some of these barriers, but in some cases the local actors were not fully aware that this support was indeed a form of capacity development. Other difficulties in communication included overuse of formalized feedback-gathering tools.

> We heard from one organization that if you don't like something, there will be a survey at the end of the project (L/NNGO, Protection sector)

> *We can definitely give credit to these international organizations for making us think about NGO work in a much more professional way. The entire process of building standards, improving accounting, analyzing our own data, and establishing a MEAL department to examine the effectiveness of our work felt like a rapid process of maturation and professionalization, thanks to their influence. (L/NNGO, Migration sector organizations)*

At the request of national actors, there has been some degree of modification in INGO/UN regulations to align with Core Commitment 2.1. Collective actions, such as lobbying by national actors and INGOs, have led to these regulatory changes supporting more flexible and context-specific funding models. For example, some INGOs noticed the differences in priorities and practices between them and L/NNGOs and adapted their funding to the latters' needs, while others emphasized giving their partners the autonomy to propose changes in projects, ensuring that projects remain responsive to changing needs and conditions on the ground.

This has affected, among others, the realization of the idea of capacity sharing, which happened in only three partnerships out of all those mentioned in the research. What seems to be a barrier in its realization is the imbalance of power in partnerships. Some of the local actors, without realizing where some of the inflexibilities stem from, opposed the term "partnership", saying this word was meaningless to them as it was used to describe a relationship in which they had so little say. They found it hard to believe that their international partners – whom they perceived as arbitrary, inflexible and always knowing better – were ready to learn anything from them.

8.2. LEVEL OF REALIZATION OF CORE COMMITMENT 2.2: UNDERSTAND BETTER AND WORK TO REMOVE OR REDUCE THE BARRIERS THAT PREVENT ORGANIZATIONS AND DONORS FROM PARTNERING WITH LOCAL AND NATIONAL RESPONDERS IN ORDER TO LESSEN THEIR ADMINISTRATIVE BURDEN.

Core Commitment 2.2 encourages less subcontracting and more genuine and equitable partnerships between the L/NNGOs and INGOs/UN in order to facilitate the delivery of a relevant, timely and effective humanitarian response. It recognises that this is not yet naturally the case, highlighting the need to better understand and work to remove or reduce barriers as a prerequisite to the establishment of more equitable partnerships.

Based on the data collected for this study, the most relevant KPIs from the NEAR framework that are used to measure realization of this commitment in Poland include (1) the participation of L/NGOs in design, implementation and evaluation of projects and budgets; (2) L/NGOSs' capacity to exercise power in partnerships, and (3) the use of partnership quality monitoring/review.

8.2.1. PARTICIPATION OF LOCAL ACTORS IN DESIGN, IMPLEMENTATION AND EVALUATION OF PROJECTS AND BUDGETS

Level of achievement: 4

Justification

8.2.1.1. Participation in design

In the emergency phase, INGOs supported local initiatives through private funds. It was only at the second stage of the response, when they received institutional funds, that many of them started looking for L/NNGOs to participate in their (i.e., the INGOs') projects. The expectation of most local actors was that they would implement their own (i.e., the LNGOs') projects in order to focus on what they could do best and upscale their core activities to include the Ukrainian refugees. These conflicting expectations were responded to in many partnerships by the practice of co-designing projects.

> *We felt the partnership more at the beginning of this cooperation, when it was really about asking what we needed. (L/NNGO, Migration sector)*

> *[During the emergency phase] international organizations thought: "you are here, you know very well what to do; do it, we will give you money". (L/NNGO, Funds, fund distributors and facilitators)*

8.2.1.2. Participation in implementation

All local organizations included in the research were fully responsible for the implementation of projects.

8. 2.1.3. Participation in evaluation

Provided the projects were evaluated (not only monitored), this was typically done by local organizations and supervised by international partners.

8.2.2. L/NNGOS' CAPACITY TO EXERCISE POWER IN PARTNERSHIPS

Level of achievement: 2

Justification

8.2.2.1. Asymmetries of power

Most local actors treated the imbalance of power between themselves and the international actors as a given, accepting this situation as long as this power was not abused. They typically saw little chance of increasing their say in partnerships; therefore, realizing their partnerships' contractual setup, reporting and monitoring requirements were eventually decided by the international actors. They also observed that their international partners often delegated to persons who were not in a position to make decisions in negotiations.

> *It was evident that some organizations worked with smaller local NGOs in a way that did not treat them as partners. These smaller NGOs were required to comply with certain demands without discussion, simply carrying out the tasks assigned to them. (L/NNGO, Migration sector organizations)*
>
> Their position was further diminished by their little awareness of the humanitarian cycle, which made the evolution of partnerships (especially the shift from the emergency phase to the later phase of a more structured response) an unpredictable process for them.

Local actors had a tendency to overcommit (sign more and bigger partnerships than they could handle). This negatively impacted their position in partnerships as they feared they might not be able to deliver on their own commitments.

So it was a bit of a problem when we started working with international organizations that had a completely different approach and requirements, often exceeding our language and administrative capabilities. (L/NNGO, Migration sector)

8.2.2.2. Exercising power in partnerships as a group effort of L/NNGOs

Considering the asymmetries of power in partnerships, a rational tactic for the local actors was to try to join forces with other local organizations and together highlight the difficulties they faced in partnerships. However, some local partners said they had no opportunity to get to know other local partners connected with their international partner, or share experiences. In some cases, the local partners participated in get-togethers (e.g., training), which did not provide them with the opportunity to provide feedback to their international partner. Eventually, the *Open letter to international donors* became an important tool by which local partners expressed their criticism in partnerships as it allowed them to mobilize their public capital and speak as a group without jeopardizing any particular organization's interests. While INGO representatives were often critical of this tool as it made public what they believed should have been a matter of discussion between partners, it should be stressed that in some partnerships there was very little contact between partners beyond signing documents. Joining forces and mobilizing their public credibility equalized communication with such powerful actors as global humanitarian players, although it also made it more confrontational.

8.2.2.3. Non-competitive partners' selection tools may give the advantage to international partners

Most international actors refrained from announcing calls for proposals and instead approached local actors directly. This was easier for those local actors that were offered cooperation, but it also gave the international actors too much space to withdraw from a prospective partnership or delay signing after their partner-to-be had made considerable preparations to enter into it.

8.2.3. USE OF PARTNERSHIP QUALITY MONITORING/REVIEW

Level of achievement: 2

Justification

8.2.3.1. Feedback tools can be inflexible

Some NGOs have partnership monitoring or feedback tools and use them. While this seems to be a step in the right direction, local actors voiced criticism over this practice. Feedback tools are rarely consulted and are often designed in a way that does not make provision for feedback when difficulties emerge (a survey shared with local partners near the end of a partnership is

a good example of this approach). In some cases, feedback tools are used instead of having a more authentic conversation.

Local partners valued the opportunity to talk openly about the quality of a partnership. Feedback sessions with the participation of more local partners seem to be an especially good idea as such events provide an opportunity for local organizations to meet and identify common concerns or the strengths of partnerships.

One of the local actors' representatives observed that their INGO partner only became more concerned over the quality of partnerships in the third year of the response, supposing that this meant the organization was about to exit. She said she was also tired of the polite replies of this partner to their feedback when they asked for modifications in procedures and reporting templates. The INGO would typically say "they would do something about it", but then nothing would happen. She believed there was little they could do about some of the concerns, and she said she believed it would be healthier for their communication to openly admit to such limitations.

> *When it comes to contracts, most of the time we didn't feel like we were able to negotiate anything as they were rather imposed forms. Maybe it's our fault that we weren't more vocal about it. If we didn't like something, there was never anything so blatant that we didn't want to sign the contract, because we also looked at it from this angle, regardless of whether we wanted to cooperate with someone or not. (L/NNGO, Diasporal and minority NGOs)*

8.2.4. ADDITIONAL OBSERVATIONS

Many observations beyond the NEAR framework point to genuine efforts on the part of international actors, especially INGOs, to build stronger partnerships. Following the *Open letter to international donors*, many INGOs recognized the excessive administrative burden on local actors and took steps towards diminishing it. These steps included internal discussions over compliance and passporting, as well as cooperation with INGOs and L/NNGOs (including the NGO "Razem" Partnership Working Group), as well as preparing responses to the *Letter*.

A large share of the INGOs' efforts related to diminishing the administrative burdens, such as discussions over the unification of due diligence procedures within the global organizational structures or between INGOs, remains invisible to local actors and thus does not necessarily translate into better relationships. Local NGOs also have a tendency to overestimate the decision-making power of international actors that also face rigid upstream compliance requirements; therefore, limiting administrative burdens is not in their individual decision-making capacity. This misperception of international actors can be considered a localization barrier, which can be overcome by better communication.

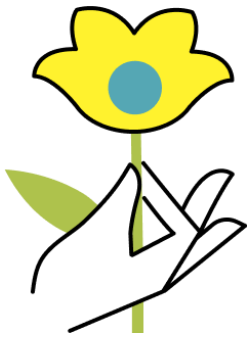
While some of the research participants representing international actors spoke of the *Letter* as undiplomatic and unfair (for instance, it did not differentiate between better and worse partnerships and was a wholesale criticism of all international organizations, INGOs and UN agencies alike), the initiative brought about positive results overall as it allowed local actors to express their concerns on their own terms. Indeed, it is questionable whether their voices would have been heard if they had allowed their protest to be expressed more diplomatically in a series of one-on-one conversations with their INGO partners.

It should be stressed that Core Commitment 2.2 emphasizes work on partnerships rather than the importance of any particular tool. Partnerships between organizations are human relationships and no tool can substitute for mutual attention, responsiveness or trust.

> *The sin of the humanitarian system is the total lack of trust. Control is the highest form of trust. (L/NNGO, Funds, fund distributors and facilitators)*

Some of the local actors pointed out that the drawback of communication with international actors was its high formalization. Personal exchanges were valued and perceived as rare. One L/NNGO representative recalled a 'human conversation' she had with an INGO representative as a turning point in her perception of international actors. It helped her realize that the INGO made actual efforts to support her organization and that the criticism of INGOs by the Polish organizations in the Open Letter was heard not only in their country, but also in regional and global offices. Another regretted that people who had rich experience from various other crises were tasked with trivial assignments on which they spent time with their organization instead of sharing their insights into the current crisis gained from the many others they had witnessed:

> *A person from one international organization with extensive experience, having participated in 20 conflicts, could have shared a wealth of knowledge that we would have greatly benefited from. However, he was instead tasked with teaching us how to fill in forms and tables. As a result, we didn't benefit from his expertise. (L/NNGO, Migration sector)*



8.3. LEVEL OF REALIZATION OF CORE COMMITMENT 2.3: SUPPORT AND COMPLEMENT NATIONAL COORDINATION MECHANISMS WHERE THEY EXIST. INCLUDE NATIONAL AND LOCAL RESPONDERS IN INTERNATIONAL COORDINATION MECHANISMS AS APPROPRIATE AND IN KEEPING WITH HUMANITARIAN PRINCIPLES.

Core Commitment 2.3 recognises the subsidiarity of international coordination mechanisms and the importance of supporting existing ones; if international coordination mechanisms are put in place, this commitment reaffirms the commitment to include L/NNGOs in them. The reserve "keeping with humanitarian principles" applies where local authorities/actors might take one side in a conflict/crisis. The final impact of this commitment is to strengthen local and national leadership, presence and influence of L/NNGOs in humanitarian coordination mechanisms.

Based on the data collected for this study, the most relevant KPIs from the NEAR framework that measure realization of this commitment in Poland include (1) the level of support given to pre-existing leadership and coordination forums; (2) the proper inclusion and participation of L/NGOs in coordination mechanisms; (3) the humanitarian response should be delivered in a collaborative & complimentary way and (4) recognition of the central role of government and LNGOs in response strategies to strengthen the humanitarian–development nexus. These KPIs measure localization based on information from non-State actors and from feedback (from local, national and international sources) and would have benefited from complementary information from local and national authorities which were not included in the research.

8.3.1. LEVEL OF SUPPORT GIVEN TO PRE-EXISTING LEADERSHIP AND COORDINATION FORUMS

Level of achievement: 3

Justification

8.3.1.1. Support for L/NNGO coordination mechanisms

Before 24th of February 2022, local organizations participated in various cooperation mechanisms which also performed coordination functions. We attempted to characterize the difference between cooperation and formalized coordination mechanisms in the second part of the situation analysis. Such cooperation mechanisms were sometimes formalized, like the Migration Consortium, Grupa Granica, or the Migration Working Group of the Warsaw Sectoral Commission for Social Dialogue (see the situation analysis). Others were informal and rooted in the common histories of involvements and exchanges of information.

As one of the INGO representatives observed, the Polish NGO sector was fragmented and the local organizations often competed for funding, which did not favor coordination. At the same time, coordination was needed in a few contexts (one such being the humanitarian crisis at the Polish–Belarusian border) as the supply of support was far exceeded by the demand. For the same reason, duplication was not seen as a challenge.

> *I sensed that Polish organizations didn't fully appreciate its [coordination's] added value. Additionally, they are not used to coordination as the Polish third sector is quite fragmented. I personally believe that, due to limited resources, organizations often compete for funding. Moreover, some organizations are inward-looking and focus on protecting their own interests or are also a bit territorial. Thus, there was not much coordination in Poland… (INGO)*

The cooperation mechanisms mentioned did not receive much international support during the Ukrainian response, which partly stems from the fact not all of them were interested in major changes to their profiles. At the same time, we did not come across any attempts by the international actors to fund the informal coordination efforts emerging in the first weeks of the response. However, the new mechanisms emerging in the response that were proposed by formalized entities were more likely to be noticed and supported.

In March 2022, the NGO Forum "Razem" started operations in response to the increased needs of coordination within the context of the Ukrainian refugee response. Its aim was to bring the international and national actors together. To date, this coordination forum has been supported financially and attended by both INGOs and local actors. The Forum is recognized as a network and forms a part of the Refugee Coordination Forum, since the sector coordination was introduced in Poland by the UNHCR (see below, part 3.2.3).

Mapuj Pomoc, run by the To Proste Foundation, is the biggest database of aid actors and services involved in the Ukrainian response. It has also received support from a number of INGOs and in 2023 became an official partner of the UNHCR.

The Migration Consortium's Forum for Cooperation and Integration, set up in May 2023, has also been supported by INGO funding.

8.3.1.2. Deployment of the RCM rather than support for existing area-based coordination

In the first weeks after the Russian full-scale invasion of Ukraine, "organic coordination" emerged at local levels, with civil society organizations, informal initiatives and local governments working together to provide aid to the tens of thousands of refugees crossing into Poland every day. Interpersonal connections rather than formalized coordination meetings enabled the distribution of tasks to respond to the needs.

Since March 2022, the Refugee Coordination Model (RCM) has been deployed by UNHCR at the regional level, particularly in Poland.[64] However, in the case of Lubelskie, a full-fledged coordination mechanism had already been launched prior to the 24th of February. The support offered by UNHCR to the mechanism was perceived as an attempt to appropriate much of the work done by the local organizations.

> *And suddenly the famous UNHCR appears with the idea that they will take over everything from us and manage us. So, we couldn't agree to it because we managed ourselves very well. We have built mutual trust with the local authorities… We have been operating in the city for years: we are not anonymous people who have suddenly appeared here. (L/NNGO, Migration sector)*

It is worth mentioning that not all voivodeships were engaged in such coordination mechanisms at the same level, and the central government of Poland was not proposing to take the lead role in coordinating local and international organizations. This situation called for a country-wide coordination solution such as the RCM, but with the risk of replacing rather than supporting local mechanisms that had taken on an important coordinating role.

8.3.2. LOCAL ACTORS ARE IN CO-LEAD POSITIONS IN SECTORS AND WORKING GROUPS[65]

Level of achievement: 3

Justification

Local organizations have been included in co-lead positions in a number of clusters and working groups. However, the majority of them are Polish organizations, and refugee-led organizations rarely hold these functions.

8.3.2.1. Inclusion of refugee-led organizations in coordination leadership

When asked about RLOs' representation in coordination forums and working groups, the UNHCR representatives provided inconsistent information on how RLOs are defined. On the one hand, this category was supposed to be based on self-declarations; on the other, it was supposed to include not only organizations established after the 24th of February, but also Ukrainian diaspora organizations and Roma-led organizations. This inclusive approach accounts for the consequences of the war for those who left Ukraine before this date or belong to minorities affected by the war. However, it does not allow for the monitoring of whether the newest and least established refugee initiatives have been included in coordination groups.

[64] In Poland as in Romania, Moldova, Hungary and Slovakia.
[65] The exact KPI is " L/NA are in co-lead positions in *Clusters*" which does not apply to the RCM.

Based on the information provided by UNHCR, organizations whose leaders crossed the Polish border as refugees after 24th February 2022 were not included in leadership of the UNHCR coordination structures. However, if we assume a broader definition of RLOs (including any Ukrainian or Roma-led organizations), the KPI can be considered achieved. Two RLOs were involved in the leadership of coordination mechanisms at various stages of the response, in line with the recommendations of the UNHCR guidance on coordination[66].

One of the UNHCR representatives contributing to this study highlighted the difficulties in passing the leadership of coordination mechanisms to local actors, which were typically overloaded with work, and some felt unprepared to take on this role. An additional barrier experienced in some of the coordination forums and working groups in the early days of the response was the dominance of English in coordination discussions. The language barrier issue has been largely overcome, but the other two difficulties remain.

8.3.2.2. Recognition of the lead role of the Polish Government in protecting and assisting Ukrainian refugees

The role of the Polish government has been key for the protection of Ukrainian refugees, with the Polish government passing an act providing assistance for Ukrainian nationals on 12 March 2022. This act gave Ukrainian refugees the right to legally remain in Poland and granted them access to the labor market, basic social services and transfers. Children from Ukraine have the right to attend Polish schools on the same basis as Polish nationals, and Ukrainian higher-education students have the opportunity to continue their education at Polish universities. Ukrainians are entitled to many social benefits, child support, family care support, nursery school subsidies, family benefits and social assistance. This is especially important because most refugees from Ukraine are currently women with children. Also, the contribution of the local governments to the response should be stressed.

> *The organizations said some incredible things but they did not take into account that in Poland, for example, many of these things are handled by the local government. We need to talk to the local government and not only to the organizations. (L/NNGO, Migration sector)*

This protection role is formally recognised in the RCM. It was also highlighted in nearly every interview with any international actor. However, the Polish government's involvement in coordination was minimal and the willingness to take the lead role has been clearly lacking.

> *In the first few months, I really tried to participate in these meetings, at least the one related to education, but it was so frustrating because we simply went there to educate*

[66] *Localization in UNHCR-led coordination structures*, UNHCR 2023, https://data.unhcr.org/en/documents/details/99054 (accessed on 06.06.2024).

international organizations on how the education system works in Poland (L/NNGO, Organizations targeting children and youth at risk through protection and education).

8.3.2.3. High representation of Polish organizations as co-lead sectors and working groups

In April 2024, 7 out of 11 sectors and working groups were co-led by Polish organizations (including the one Roma-led, mentioned earlier):

- The Halina Niec Legal Aid Center co-leads the Protection sector with UNHCR
- Habitat for Humanity Poland co-leads the Shelter Housing & Accommodation sector with IOM
- Caritas co-leads the Economic Inclusion sector with UNHCR
- Towards Dialogue co-leads the Accountability to Affected Populations working group with UNHCR
- FRD co-leads the Protection from Sexual Exploitation and Abuse Network with UNHCR and UNICEF
- PCPM co-leads the Cash based interventions working group with Save the Children
- PAH is the hosting agency for the NGO Forum “Razem”

8.3.3. HUMANITARIAN RESPONSE IS DELIVERED IN A COLLABORATIVE & COMPLIMENTARY WAY

Level of achievement: 3

Justification

8.3.3.1. Reported difficulties and frustrations in the collaboration

Language barriers and the complexity of the UN’s systems initially impeded the ability of local actors to fully engage in internationally led coordination programs. However, it should be recognised that efforts were later invested to translate into Polish and Ukrainian.

The collaboration within the working groups has not been easy and our research participants have reported a lot of frustration, as well as criticisms of lack of efficiency. This can be partly explained by the complexity of the humanitarian coordination system and/or the lack of information about it.

> *Initially, the refugee coordination model attracted both international and national organizations. However, shortly after its establishment, national organizations began to withdraw from the system. It became increasingly difficult to involve them. (UN agency)*
>
> *We were engaged in the refugee coordination models of the different working groups. I think that these were serving primarily as some high-level information exchange forums and not so much as a decision-making body or a technical working group. (INGO)*

8.3.3.2. No major gaps or overlaps in the collective response

However, there were less gaps or overlaps in the humanitarian response, which is the main evidence of effective complimentary work between UN/INGOs, local NGOs, Government and local authorities.

8.3.4. RESPONSE STRATEGIES OUTLINE THE ROLES OF GOVERNMENT AND L/NGOS TO STRENGTHEN THE HUMANITARIAN-DEVELOPMENT NEXUS

Level of achievement: 3

Justification

At the level of local governments, some INGOs' exit strategies included supporting existing structures, especially in cases when the INGO cooperated with local governments directly.
In the near future, together with the exit of international actors, the issue of coordination will shift toward the relationship between CSOs and local and national authorities. This will come with discussions around the political dimension of the integration issue.

8.3.5. ADDITIONAL OBSERVATIONS

8.3.5.1. Unclear main objective - or too many objectives in the refugee coordination model (RCM)

Some research participants raised the question of the main objective of the RCM. Indeed, the RCM aims to coordinate humanitarian organizations, raise funds (through the Regional Refugees Response Plan), facilitate learning in order to improve the response, and facilitate the exchange

of information. This multiplicity of aims could explain why some expectations inscribed in the modelo remain unfulfilled, such as the UNHCR's expectation to receive activity reports from aid actors that do not consider that they have to report to a structure that does not fund them. Together with this question, some research participants underlined the risk of conflict between these aims.

8.3.5.2. Interests and feasibility of the area-based coordination model

The possibility of strengthening locally led coordination or area-based coordination in situations in which local actors are at the forefront of the response, as was the case in Poland during the first weeks of the response, deserves more attention. These mechanisms, ideas and practices could have been strengthened and incorporated into the later coordination mechanisms rather than replaced by new systems. Such an inclusive approach may also have ensured the wider participation of local actors in the coordination mechanisms, which were seen by many of the actors as relatively ineffective:

> *I just think we are really inefficient and it's a waste of time in most cases; resources and time are wasted for coordination that does not really lead anywhere. In many ways, we are just talking about coordination, but nobody really wants to coordinate because everybody has their own agenda. (Polish NGO involved in leadership of a coordination mechanism)*

> *So, I could also understand why we often heard from partners that they're not inclined to participate in those forums because they're of no use to them, especially if their focus is on one specific location in Poland, but not Poland-wide. (INGO involved in leadership of a coordination mechanism)*

8.4. LEVEL OF REALIZATION OF CORE COMMITMENT 2.4: TO ACHIEVE, BY 2020, A GLOBAL AGGREGATED TARGET OF AT LEAST 25% OF HUMANITARIAN FUNDING TO LOCAL AND NATIONAL RESPONDERS AS DIRECTLY AS POSSIBLE IN ORDER TO IMPROVE OUTCOMES FOR AFFECTED PEOPLE AND REDUCE TRANSACTION COSTS.

Core Commitment 2.4 is probably the best-known localization commitment as it states a clear and measurable target of funding to L/NNGOs. The mention of "as directly as possible" enables including indirect funding through international partners such as UN or INGOs in the calculation, which makes it very challenging to track globally.[67] Sadly, this target has not been reached globally and the level of direct funding even decreased in the period from 2020 to 2022.[68] However the commitment remains valid for the majority of the signatories of the Grand Bargain beyond 2020, with the final impact being to increase the number of local actors with strengthened financial independence.

Based on the data collected for this study, the most relevant KPIs from the NEAR framework that measure the realization of this commitment in Poland include (1) Increases in humanitarian funding for L/NNGOs; (2) INGOs/UN to publish the percentage of funding that they pass to L/NNGOs; (3) Funding for operating costs to include the relevant institutional costs; (4) Overhead costs to be shared equally between L/NNGOs and INGOs/UN with no reporting; (5) Funding is provided that is adequate to meet quality standards; (6) Transparency of financial transactions and budgets with L/NNGOs; (7) Flexibility for L/NNGOs to make reasonable adjustments during implementation, and (8) Availability of multi-year financing for preparedness, stability and quality.

8.4.1. INCREASES IN HUMANITARIAN FUNDING TO L/NNGOS

Level of achievement: 4

Justification

Contrary to global trends, funding for local organizations in Poland has been high, even if comprehensive figures of the total share of humanitarian funding transferred to L/NNGOs are

[67] As stated in the Global Humanitarian Assistance report 2023 "Limited improvements in the reporting of funding that passes through one or more intermediary organizations means that monitoring the Grand Bargain commitment of providing 25% of global humanitarian funding 'as directly as possible' to local and national actors remains impossible". (Angus Urquhart, Erica Mason, Fran Girling-Morris, Suzanna Nelson-Pollard, *Global Humanitarian Assistance 2023*, Development Initiatives, https://devinit.org/resources/global-humanitarian-assistance-report-2023/, accessed on 06.06.2024)

[68] Development Initiatives' Global Humanitarian Assistance Report 2023 notes 'Combined direct and indirect funding to local and national actors fell from 2.7% of overall assistance in 2021 to 2.1% in 2022. This suggests that it is at the lowest level since 2017, when implementation of the Grand Bargain commitments began, and is a second consecutive year-on-year decrease from 2020.'

not always available. From the sample provided by the INGO Country Directors Coordination Working Group within the NGO Forum "Razem" (see table on the next page), an average of 53% of the funds managed by 8 INGOs was transferred directly to local organizations in 2022 and 2023, with one organization transferring up to 84% of its budget, and another only 8%.

This took place in the context of a very well-funded response, compared to other humanitarian situations. The UN's appeal for Ukraine was 69% percent funded in 2022; the analogous percentages for 2023 and 2024 are 32% and 8% at the time of writing the report. In comparison, the UN response plan for Sudan in 2022 was around 20% funded.[69]

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[69] Source: Redfern Corinne, *How the focus on Ukraine is hurting other humanitarian responses*, The New Humanitarian, https://www.thenewhumanitarian.org/news-feature/2022/07/07/Ukraine-aid-Russia-invasion-funding-donors (accessed 19/06/24)

	2022 ACTUALS			2023 ACTUALS			2024 ESTIMATE		
Organization	Total budget in USD*	Total transferred to local partners in USD **	% of total transferred directly to local partners	Total budget in USD *	Total transferred to local partners in USD **	% of total transferred directly to local partners	Total budget in USD *	Total transferred to local partners in USD **	% of total transferred directly to local partners
TOTALS	**$99,371,381**	**$52,184,743**	**53%**	**$108,225,297**	**$57,436,753**	**53%**	**$59,712,481**	**$26,730,882**	**45%**
Agency 1	$2,095,793	$1,197,946	57%	$13,566,598	$6,732,160	50%			
Agency 2	$5,021,089	$3,125,640	62%	$12,899,067	$6,094,784	47%	$429,265		0%
Agency 3	$8,088,004	$626,263	8%	$5,448,146	$650,000	12%	$2,000,000	$350,000	18%
Agency 4	$8,900,000	$4,500,000	51%	$13,036,480	$5,942,287	46%	$8,239,400	$4,119,700	50%
Agency 5	$12,666,833	$6,895,231	54%	$7,592,300	$5,498,448	72%	$5,400,000	$3,672,000	68%
Agency 6	$16,938,520	$14,356,196	85%	$18,992,306	$15,658,874	82%	$17,511,816	$13,497,182	77%
Agency 7	$20,400,000	$6,100,000	30%	$15,500,000	$3,700,000	24%	$10,800,000	$1,700,000	16%
Agency 8	$25,261,142	$15,383,467	61%	$21,190,400	$13,160,200	62%	$15,332,000	$3,392,000	22%
	* including HO overheads and all country office costs								
	** including program and support costs								

8.4.2. INGOS/UN PUBLISH THE PERCENTAGE OF FUNDING THAT THEY PASS TO L/NNGOS

Level of achievement: 3

Justification

While some international actors published the percentage of funding they pass to L/NNGOs, this figure was reported differently by different actors (e.g., regional basis v. national basis), which makes the data difficult to compare. Moreover, it is difficult to find online and is often only available in English. During our interviews, few of the INGO research participants were able to provide the figures, and only one UN agency provided the figures for both years in the interview.

At the same time, a number of the INGOs operating in Poland took additional steps to increase the visibility of funding and published an article on the Relief Web portal, where they announced the funding figures for the years 2022–2023: *We are proud to share that in 2022 [we] transferred over USD 50 million directly to local partners in Poland. In 2023, this figure increased up to USD 60 million. In total, we will have transferred over USD 110 million directly to different local partners by the end of this year, representing on average 51% of our total country office budgets.*[70]

8.4.3. FUNDING FOR OPERATING COSTS, INCLUDING RELEVANT INSTITUTIONAL COSTS

Level of achievement: 3

Justification

8.4.3.1. Sufficient funds, delayed payments

Most of the local organizations interviewed considered the level of funding received from their partners as sufficient to cover all the necessary costs, including operations and institutional costs. However, the challenge many of the local players faced was related to delayed payments. A delay of several months could affect the smaller local actors' financial liquidity. It was also reported as stressful, especially in cases when the international partner organization was unresponsive, which was a frequent criticism of UN agencies. Delayed payments translated into financial losses.

> *We have experienced delays in funding of up to 6 months; in such cases we would take a loan and then pay it off when we got the installment. We should discuss which party*

[70] *Over USD 110 million transferred to local partners in Poland for the Ukraine Response*, Relief Web, 21 November 2023, https://reliefweb.int/report/poland/over-usd-110-million-transferred-local-partners-poland-ukraine-response (accessed on 06.06.2024).

of the partnership bears the cost of the loan taken due to delayed disbursement of funds. In some instances we would finance one project with funds from another. (L/NNGO, from the minutes of NGO Forum "Razem")

The consequences of delays for local organizations should be highlighted as a factor impeding full achievement of the KPI.

Outliers:

- One local actor reported that their INGO partner delayed the formal start of the project after it had encouraged the organization to start its implementation via email. The local organization started work on the ground and was forced to cover its costs itself, since the INGO did not qualify the early start they recommended as the actual start of the project.
- Another local actor received a grant for core administrative and management expenses. The research participant presented it as the most helpful form of support in the organization's history (dating back to the 1990s) as it allowed their office team to focus on their core work without the necessity to combine it with field or coordination activities. The grant also stabilized the organization's financial situation between different projects (in the case of one project, the organization did not receive funding for more than 9 months) and fostered organizational development.

8.4.4. OVERHEAD COSTS SHARED EQUALLY BETWEEN L/NNGOS AND INGOS/UN WITH NO REPORTING

Level of achievement: 4 (more than expected)

Justification

Only one of the local organizations contributing to this study declared that the administrative costs of their project's implementation in partnership with an international organization were not covered at all. This local actor stressed it was their own decision: the money was available, but the organization was able to cover the overheads from another source. In other cases, the overhead costs were typically mostly covered, presumably exceeding the Grand Bargain threshold.

Some organizations had a lot of reporting or administrative requirements but provided no funds for administration at all. (L/NNGO, Migration sector)

It is difficult to assess the proportion of overhead costs covered by international actors as there was no common understanding between the research participants regarding what "overhead" actually meant and whether these costs should only apply to the implemented project, or whether they should extend to other administrative costs of local partners. For this reason, during the research we sometimes only asked about administrative expenses covered by local

actors during project implementation. Most interviewees said these were covered by their international partners, and no major concerns were raised around this issue. One Polish humanitarian organization said the negotiation process related to the overhead costs with one of their partners was especially difficult, but they finally managed to get the 100% coverage they wanted. A representative of one of the INGOs shared a piece of information which harmonized with this story: their organization was usually ready to cover the full overhead costs (as they understood them), but any such decision needed to be negotiated.

At the same time, it seems the research participants were inclined to focus on the later phases of the response as some of the INGOs openly admitted that they did not initially cover overheads and only started doing so after negotiations with their local partners. At the very beginning of the response, the same applied to organizational development costs.

> *The Money was for direct service; it flowed by the organization and did not stay in it, did not strengthen the structure. It means that these structures may be weak and unstable at the moment. That a lot of things have flowed through us, work has been done, but nothing has been left for us. (L/NNGO, Funds, Fund distributors and Facilitators)*

Some of the INGOs accepted sharing overhead costs with no reporting, which was highly appreciated by their local partners.

The importance of international actors covering overhead costs has also been stressed in *The Voluntary Guidelines on the Nature of Contractual Partnerships*, elaborated by the NGO Forum "Razem" Partnership Working Group, which shows that a number of INGOs are committed to ensuring such expenses are not a burden on local actors:

> *Towards Stability and Equal Treatment: Recognising the importance of overhead costs for capacity building and development of the organization , as they allow for financial stability and provide an opportunity to build the financial health of the organization. INGO partners should strive to include them in partnership agreements with L/NNGOs and advocate to their donors to allow for the covering of back-office positions. It is recommended for INGOs to have a unified policy on overhead costs towards their local partners, understanding the limitations and constraints.*[71]

At the same time, the UNHCR administrative instructions establish Partner Integrity Capacity and Support Cost (PICSC) in different percentages for L/NNGOs and INGOs (4% and 7% respectively). This policy will be revised this year; until then, the percentage will stay unequal.

[71] https://forumrazem.org.pl/pl/announcements/post/323
https://drive.google.com/drive/folders/1wT9g9Fdjj_v1NglJmar5lwvzRSXwOWIh?usp=sharing

8.4.5. FUNDING IS PROVIDED THAT IS ADEQUATE TO MEET QUALITY STANDARDS

Level of achievement: 4

Justification

The research participants generally agreed that the available direct funding was enough to implement projects according to the highest standards. What more often impacted the quality of implementation was the short duration of the projects and pressure to spend high amounts of money in a very short time. This challenge was acknowledged by most research participants and is also mentioned in the *Voluntary Guidelines:*

> *3.1 Extension of Funding Cycles: INGOs and L/NNGOs should have a discussion on how to extend funding cycles to provide more stability and predictability in project planning and implementation. While short-term (<3 months) projects might be justified in the pilot phase or punctual interventions, we shall all strive to ensure that long-term projects are not realized through short-time extensions. (Voluntary Guidelines)*

Bearing in mind the widespread awareness of this limitation, we assume that the KPI was fully achieved.

> *So there were at least a few donors, but we didn't get stability from them. There were short projects, often projects of three months; the funds were barely enough to cover our needs, and we were unsure if we could extend this cooperation. (L/NNGO, Organizations targeting persons with disabilities and their families)*

8.4.6. TRANSPARENCY OF FINANCIAL TRANSACTIONS AND BUDGETS WITH L/NNGOS

Level of achievement: 2

Justification

It is noteworthy that due to the emergency nature of the situation at the beginning of the full-scale invasion, initial funds were disbursed to partners identified through networking and prior connections instead of open calls for proposals. As the situation evolved, the regular selection process settled in. However, L/NNGOs that had been able to catch the initial wave and gain the trust and support of INGOs had better opportunities to extend partnership agreements or be considered for future projects.

> *But, generally, the most burdensome thing was that out of all the grants, only one from an international organization was from an open call. All the others happened in*

different ways: for example, organizations knew each other or it was some continuation or some proposal. (L/NNGO, Migration sector organizations)

A major challenge faced by local organizations was the lack of transparent information on the criteria for establishing cooperation with international organizations and the ways of entering these partnerships. Many expressed their preference for open calls for proposals, which was perceived as a more reliable process.

Some of the INGO representatives saw open calls as favoring the strongest organizations and preferred non-competitive funding mechanisms throughout their presence in Poland. For this approach to be effective, one precondition would be basing the search for partners on reliable and regular mapping. Over-reliance on networks may lead to the result that these INGOs wanted to avoid.

8.4.7. FLEXIBILITY FOR L/NNGOS TO MAKE REASONABLE ADJUSTMENTS DURING IMPLEMENTATION

Level of achievement: 4

Justification

Most L/NNGO research participants assessed flexibility during the emergency phase as sufficient. However, flexibility levels differed depending on the stage of the response, being higher in the emergency phase. Later, when projects became more formalized, introducing changes required more procedural discipline and time. Still, in the vast majority of partnerships, reasonable adjustments in terms of finances were possible during implementation.

8.4.8. AVAILABILITY OF MULTI-YEAR FINANCING FOR PREPAREDNESS, STABILITY AND QUALITY

Level of achievement: 2

Justification

At the beginning of the crisis, most projects were about 6 months long. As the situation became clearer, longer programs began emerging, with their average duration being significantly impacted by the funding model and the stability of funds. Programs funded through stable, multi-year donor support tend to have a longer duration, typically ranging from 12 to 18 months, thus allowing for better impact and more sustainability. However, shorter projects were still offered to L/NNGOs, and 2-year projects were very rare.

While some organizations were able to secure stable multi-year funding, allowing them to plan and implement long-term projects effectively, others faced challenges due to fluctuating or inconsistent funding, impacting their operational capabilities and strategic planning.

Longer programs funded by INGOs and UN agencies usually incorporated exit strategies aimed at ensuring sustainability after the program is completed, such as reinforcing local actors and response practices. While some INGOs and UN agencies reported having set a solid exit strategy in place by means of various capacity-building efforts and the gradual transition of leadership to local staff, the majority seem not to have made this effort. Several L/NNGOs reported that they were not made aware of their donors' future plans (including exit strategies), thus reflecting inefficient communication and low transparency.

8.4.9. ADDITIONAL OBSERVATIONS

It should be recognized that many international actors made efforts to mitigate the risk of directing too much investment to the same audiences and organizations. We pointed out that their efforts at diversification did not prevent some actors from receiving more attention and having better chances of winning funding than others. Here, we would like to discuss the effects of INGO funding on Ukrainian-led organizations.

In the first part of the situation analysis, we pointed out that international funding significantly impacted the growth of Ukrainian-led organizations. Some representatives of the Ukrainian diaspora-led organizations believed the crisis finally gave them opportunities to win funding and join the circles of recognized organizations in the migration sector. Before 2022, they felt "second league" as their organizations were largely invisible and deeply underfunded. As one of the research participants put it: *[Name of INGO] would never have noticed us in our lifetime if the war had not started; as frightening as it sounds, the war has helped many organizations like ours to move forward.*

While the feeling of being "second league" recurred in these new circumstances, the Ukrainian-led organizations saw an opportunity to join the bigger players. They also had a far greater perception than the Polish CSOs of the unambiguous opportunities afforded by the presence of the global humanitarian players in Poland:

> *Many international organizations really have some closed circles of organizations they work with. And once you break into that closed circle, you will be informed about the next funding opportunities in the future. (Ukrainian-led organization, established before February 2022)*

Some of them, especially the younger and smaller organizations, had to overcome their partners' suspicion, which was painfully felt, but they were determined to do so to facilitate their organizations' development:

> *It seems to me that we exceeded our partner's [a UN agency] expectations because we were a young organization at the time – too risky for them. At the beginning of our partnership, they even asked us not to mention the partnership because they didn't quite believe we would succeed. However, they later involved us in other projects, and we did a lot from a communication standpoint for [this UN agency], even things that were not assigned or planned in our agreement. I can say that we had no expectations and we are satisfied with the cooperation; we delivered everything we planned one hundred percent. However, [the UN agency] had doubts about us, and I think, I'm sure, that we definitely dispelled them in the first month of work. (Ukrainian-led organization, established after February 2022)*

As with any other category of organization, among the Ukrainian-led ones there were those who caught the wave and those who struggled to find a donor. Some of them blamed this on their peripheral location, asking "But what are small organizations in small towns supposed to do?", or calling their middle-sized town "practically a village" to explain why international actors may never come their way. An interesting observation was made by a representative of an Ukrainian organization which was the only such organization in the region:

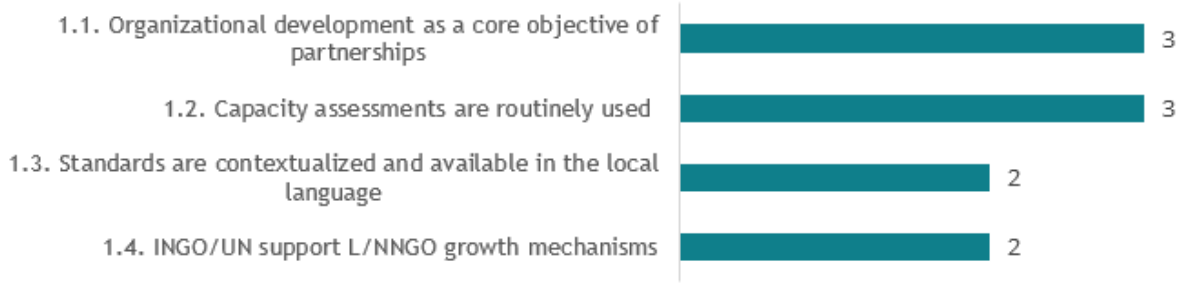
> *I actually think that one of the reasons for the success and rapid development of our organization was the absence of other [Ukrainian – KM] organizations in our region. In principle, it was easier for me to find partners among Polish organizations, since all I had to do was say that we are Ukrainians – and that was enough. Everything was understood. If I had been in Krakow, there would be 100 Ukrainian organizations there. And why should we help specifically your organization and be partners with you? Here, there was indeed such an advantage. I still use this uniqueness, and it helps to some extent. (Ukrainian-led organization, established after February 2022)*

Despite all the difficulties, the Ukrainian-led organizations emerged as strong presences in the localization dynamics in Poland, therefore their rapid growth and future needs should be carefully considered in international organizations' exit strategies. The larger the local actors grow, the more likely they are to experience internal difficulties in descaling operations. It would also be an added value to Polish civil society if the Ukrainian-led organizations were able to maintain the strong position they have achieved in the last two years.

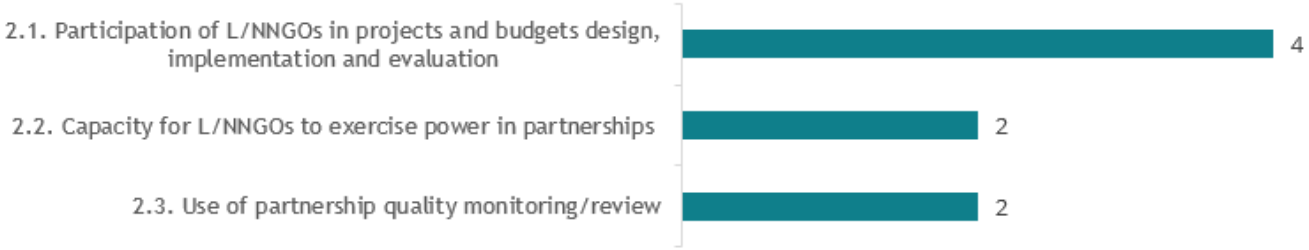
Two further observations related to Core Commitment 2.4 should be added. Firstly, due to the high response capacities of local actors, many INGOs had to act as donors, their main added value being the collection and transfer of funds. Becoming a donor consists of a cultural change for international organizations, many of which are still hesitant to change their mandate in the context of localization. Meanwhile, this is not a conscious choice at the organizational level and even less at the individual level. Most INGO representatives are motivated by direct humanitarian action rather than distributing funds and reporting about them. As stated by an INGO representative, "We do not see ourselves as donors, but we should accept the fact that we actually are and are seen as such by local organizations". Secondly, it should be recognized that nearly all international organizations had simpler administrative procedures and forms of funding for smaller projects and smaller organizations

8.5. ASSESSMENT AGAINST THE NEAR FRAMEWORK: SUMMARY TABLE

1. Level of achievement of Core Commitment 2.1: Increase and support multi-year investments in the institutional capacities of local and national responders, including preparedness, response and coordination. Average score: 2.5.



2. Level of achievement of Core Commitment 2.2: Understand better and work to remove or reduce the barriers that prevent organizations and donors from partnering with local and national responders in order to lessen their administrative burden. Average score: 2.66.



3. Level of achievement of Core Commitment 2.3: Support and complement national coordination mechanisms where they exist and include national and local responders in international coordination mechanisms as appropriate and in keeping with humanitarian principles. Average score: 3.

4. Level of achievement of Core Commitment 2.4: By 2020, achieve a global aggregated target of at least 25% of humanitarian funding to local and national responders as directly as possible to improve outcomes for affected people and reduce transaction costs. Average score: 3.25.

9. LOCALIZATION ENABLERS AND BARRIERS

This chapter builds on the findings presented earlier in this report to discuss localization enablers and barriers. In our conversations with the research participants we found that some practices, models and ideas may work as both enablers and barriers, depending on the context. For instance, an enabler may sometimes actually act as a barrier, while barriers big enough to be recognized by all stakeholders have better chances of being collectively removed. Where relevant, we add a sentence about these "ambiguities" of localization.

The lists of barriers and enablers below include items less or more commonly indicated by the research participants. Not all of them had to cope with barriers and not all would benefit from an enabler. These lists are based on the experiences of actors involved in the Ukrainian response in Poland and might be irrelevant in other contexts.

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9.1. BARRIERS

9.1.1. PROXIMITY BIAS

Most response activities focused in the areas close to the Ukrainian border, Warsaw, Krakow, and cities in south-eastern Poland. The number of refugees in these areas has been especially high, which fully justifies more intense aid activities. At the same time, the migration flows to other parts of Poland, especially smaller towns, have been tracked with less scrutiny.

Examples:

For instance, local actors in small towns in the western voivodeships (Lower Silesia, Lubuskie and Opolskie) we talked to received decidedly less attention than organizations in the east. Also, they provided aid to large numbers of refugees at certain periods, yet during the emergency phase they remained invisible to the larger humanitarian actors. These local actors were sometimes only noticed after the arrival levels had peaked and the number of people in need in their area was dropping. Considering the fact that Poland has a dense network of public sector institutions across its territory, including local and central government institutions, gaps in the initial mapping and coordination activities can be largely attributed to their insufficient preparedness for the crisis and the lack of initiative on the part of the government to take over coordination responsibilities. Public actors were best positioned to play the leading role in these exercises, but their potential was not adequately used.

9.1.2. THE DECONTEXTUALIZED CHARACTER OF HUMANITARIAN MODELS, STANDARDS AND COMMITMENTS

Localization is a clear concept, but what it means in practice depends on time, place and people. While localization guidelines and measurement frameworks help international actors to include local organizations and initiatives in the humanitarian response, they become detached from the local context in two ways: they tend to be abstract, and they assume one-sided commitments. As a result, in each new place the models, standards and commitments need to be contextualized, which requires time and considerable effort.

Examples:

- The category of Refugee-led Organizations (RLOs): while RLO is a term commonly used by humanitarian actors, it became empirically problematic in the Polish context. Let us first consider the applicability of this category for the Ukrainian-led organizations. Poland had a Ukrainian diaspora that exceeded 1 million members prior to 202272. Few

[72] Maciej Duszczyk & Paweł Kaczmarczyk, *War and migration: the recent influx from Ukraine into Poland and possible scenarios for the future*, Newsletter of Center of Migration Research, https://www.migracje.uw.edu.pl/wp-

of them had any form of international protection, and the vast majority classified as economic migrants from a legal perspective. Still, it is difficult to clearly distinguish between the forcibly displaced and the diaspora, which is a distinction between the RLOs and other Ukrainian-led organizations would require. Let us think of the possible criteria of delineation. The criterion of having UKR status does not do justice to the complex fates of individuals as not all war refugees applied for it. Also, 24th of February 2022 is not the determining date for who can and cannot be reasonably considered a war refugee as Ukraine was invaded by Russia in 2014. Having to flee is also not necessarily an adequate criterion since many diaspora members lost their prospects of returning to Ukraine with the full scale invasion, which is also a form of displacement. One of the international actors included in the study solved these difficulties by relying on self-declaration in RLOs' identification. Our interviews allow us to formulate three additional observations on this approach. Firstly, the distinction does not come from Ukrainians living in Poland as they tended to emphasize the mutual support between the established diaspora organizations and the newcomers. Secondly, not all displaced persons wanted to label themselves "refugees", a term some of them associated with helplessness. Thirdly, being only two years after the mass influx of refugees from Ukraine, RLOs as a separate category of organization had very little time to develop, especially considering the daily life difficulties their leaders had to overcome in a new country alongside their aid activities. This was also highlighted by the international actors that aimed to include RLOs in their activities but found few of them had enough people or the capacity to take responsibility for, e.g., leadership of coordination mechanisms. Finally, we should also point out that there are NGOs in Poland led by refugees from countries other than Ukraine which were launched long before the 24th of February 2022.

- While localization is a multi-stakeholder process, the key localization commitments tend to be one-sided: international actors commit to strengthening local actors as part of their response. It seems difficult to think of another formulation of localization ideals, but this one-sidedness makes it necessary to contextualize humanitarian models and practices transplanted into the new sites of intervention, especially to make them understandable in terms of local public moralities. In other words, successful, equitable cooperation requires shared commitments. A good example of unsuccessful contextualization may be the unmet requirement to report for appeal purposes as part of the Regional Refugee Response Plan, which in 2023 achieved only a 38% response rate among local partners73. A UNHCR representative commenting on this rate suspected that local actors did not fully realize or accept the appeal function of reporting. As a result they did not understand why they should be committed to providing regular information.

content/uploads/2022/04/Spotlight-APRIL-2022.pdf?utm_source=miragenews&utm_medium=miragenews&utm_campaign=news (accessed on 06.06.2024); Data on Ukrainian mobile phone users in Poland in January and February 2022: Slectivv, https://selectivv.com/ukraincy-w-polsce-dynamika-populacji/ (accessed on 06.06.2024).

[73] More information on RRP reporting: https://data.unhcr.org/en/dataviz/303?sv=54&geo=10781 (accessed on 06.06.2024).

Outliers:

- Structures such as confederations of humanitarian/aid organizations, such as Caritas or the Red Cross, are one step ahead in their localization endeavors as their members typically know of each other's existence, share some core values, and have some channels of communication.
- Based on the research results, the least challenging partnerships related to the Ukrainian response in Poland were those sealed within the humanitarian world: between the global players and the local actors with humanitarian experience. These partners shared a vocabulary and core values. Moreover, the local humanitarian actors were familiar with the humanitarian cycle and the large-scale projects typical of humanitarian response (e.g., cash assistance projects).

9.1.3. STRUCTURAL BARRIERS RELATED TO THE EMERGENCY CHARACTER OF THE FIRST PHASE OF THE RESPONSE

Humanitarian interventions typically start as emergencies, which does not favor smooth localization. Partnerships and forms of cooperation between international and local actors are not given time to evolve. This poses a challenge for localization commitments related to capacity building as there is not enough time to build the response capacities of local partners, which are often needed. It may also encourage overcommitment on the part of local actors, who during the emergency phase often perform beyond their capacities and are later encouraged by their partners to continue working at the same scale and pace.

Examples:

- An informal initiative launched by a few Poles who felt they "had to engage" managed to mobilize numerous volunteers, donors and material resources to provide aid at the Polish–Ukrainian border in the first days of the crisis. They provided thousands of refugees with basic food, clothing, and hygiene items. The leader of this initiative later regretted that they had had no training in safeguarding or safeguarding standards at the time as she had struggled to explain to some of the volunteers why their behavior towards third-country nationals was unacceptable. She also felt the team was unprepared to mitigate the risks of human trafficking. Her team was only able to invest in their own capacities in the second year of the response. They highly valued the support they received from their INGO partner but also regretted they did not have the same tools in the first weeks of the response.

9.1.4. STRUCTURAL BARRIERS TO MANAGEABLE GROWTH

Since Poland had not been a site of humanitarian intervention prior to 2022, with NGO and public sector aid and social work being underpaid and often done by volunteers, local

organizations had to develop strong identities simply to keep their teams. On the other hand, it became apparent that the skills required to effectively respond to the massive influx of refugees were hard to find after February 2022. This impacted the international and the local actors differently.

Examples:

- International actors that sought local staff at the onset of the response spoke of the challenges of finding staff. One higher-management representative even called his work in Poland "the most difficult" of his entire career because of the long period when intense work in his organization was combined with understaffing and the time-consuming need to find new employees and introduce them to their tasks. The international actors that were looking for staff in the emergency phase typically expected them to speak English, Polish, and Ukrainian, and to have some familiarity with humanitarian work or work with migrants. These turned out to be a relatively rare combination of competencies, so both the recruitment and inception of new staff negatively impacted efficiency.
- Local actors were typically ready to give up some of these expectations, e.g., the requirement of the candidates to speak English as well as Ukrainian and Polish, thus they could absorb the talents of Ukrainians more easily. As explained in the situation analysis, their organization structures had strong communitarian features. The more important the community component was for an organization, the more difficult its growth became. An example may be provided by a local NGO which grew from around a dozen to over a hundred employees and still sought to retain some of the features of a community. The leader of this organization found herself spending hours in conversation with the organization's staff about how they felt about their work, managing internal conflicts between representatives of various nationalities, or supporting employees whose private life interfered with their work. In more formalized, less community-driven structures, such work could be delegated to other employees, if undertaken at all.

9.1.5. NO SHARED DEFINITION OF SUCCESS

Lack of a shared definition of success made it difficult for partners to make their cooperation meaningful and satisfying. Some of the INGOs' representatives participating in the study believed that it was a success for a local organization to simply enter into partnership with a renowned international organization, or to develop the skills needed to sign similar partnerships in the future. While this perspective may hold true for the larger and more professionalized players, it has not resonated with most organizations in the research sample.

9.1.6. EXCESSIVE ADMINISTRATIVE BURDEN ON LOCAL ACTORS

The heavy administrative burden on local actors was a topic of debate among stakeholders involved in localization. This barrier was identified and addressed, which made it less of a barrier. Discussions were largely shaped by the *Letter to international donors and other organizations*, which pointed out the need for more alignment in due diligence procedures and other administrative requirements. The harmonization of procedures may be an effective solution relieving LNGOs of the excessive administrative burden, but reaching this ambitious goal may take time. The excessive administrative burden may also be limited by extending the length of projects implemented through local partners.

9.1.7. COPING STRATEGIES OF L/NNGOS FAVORING OVERCOMMITTING TO PARTNERSHIPS

As explained in the situation analysis, many local actors struggled to make ends meet for years prior to February 2022. Their coping strategies included taking high risks when funding was available, or self-sacrificing when it was not. Some of them were unprepared to say "no" to a partnership for fear another opportunity may not arise any time soon. They accepted partnerships when they realized they were able to deliver what was expected in the field but without the financial capacity to tackle risks related to delayed payments or the human capacity to tackle the reporting requirements. On the way, they experienced loss of liquidity, threats of insolvency, and deep internal conflicts. After a phase of rapid growth, some entered a vicious circle of overcommitment in order to be able to maintain their growth. The high incidence of burnout among local organizations is also largely attributable to their tendency to build capacity on the basis of individuals' readiness to undertake very challenging tasks, work overtime and put the good cause before their well-being.

Example:

- A local organization oriented towards supporting migrants and refugees managed to operate at more than their full capacity in 2021 and 2022. They provided support on both the Polish–Belarusian border (from 2021) and the Polish–Ukrainian border (from 2022). They never had financial reserves and functioned from month to month. Their activities required a lot of logistical and physical work, so the profile of their staff was far from that of office workers. With the influx of international funding for humanitarian activities, this organization's leadership decided to seal all partnerships whose fieldwork related to goals they were able to deliver. They did not realize how much office work the partnerships would require. They struggled with monitoring and reporting, which translated into delayed payments and increased the likelihood that projects would not be completed on time. The organization lost financial liquidity. They worked overtime and some members decided to give up their salaries to diminish the risk of insolvency. They also realized they were unable to maintain their growth (from 15 to 80 people in

a year), and decided to downsize gradually, letting go of around 60 persons. During the interview, a representative of the organization admitted that one of their key partners clearly communicated their expectations related to evidencing the work done. He said the organization's management suspected that the requirements may be difficult to meet, but they hoped that eventually they would deliver (*jakoś to będzie*).

9.1.8. TOO LITTLE AWARENESS-RAISING REGARDING THE KEY CHARACTERISTICS OF THE HUMANITARIAN CYCLE AMONG L/NNGOS

Most local actors were not aware of the fact that changes in the response's dynamic they experienced were typical of the humanitarian cycle. Many expected the crisis would be over in just a few weeks. What came as a surprise to many was the changes in funding availability and requirements after the emergency phase. More awareness of the course of typical humanitarian interventions would have helped the LNGOs approach the crisis as a set of predictable events, develop their own response strategies, and better contain their growth.

Example:

- One LNGO representative was disappointed that the experienced humanitarian workers who came to Poland in 2022 did not share more stories of their experiences in other parts of the world. She also highly valued sharing experiences with LNGOs from other sites of humanitarian intervention, which allowed her to understand "what we would be going through". Discussions with other organizations at the same level allowed her organization to better understand how their partnerships might evolve, and what management mistakes her organization might be likely to make at various stages of the response.

9.1.9. TAKING NEUTRALITY OF ASSESSMENT TOOLS FOR GRANTED

Many local actors stressed that Poland was not a typical site of humanitarian intervention and believed that the international actors were not aware of this specificity. These observations were usually illustrated by questions which the global players directed to LNGOs in the emergency phase. Such questions were a part of their standard assessments. They may have concerned issues such as sanitary conditions at reception or accommodation centers. As both Poland and Ukraine have a long history of struggling with a feeling of inferiority related to being "behind" the West in terms of economic, social or technological development, such questions felt offensive to many local actors. There was little time to conduct sensitivity analyses at the beginning of the response, but a friendly review of assessment tools done by a local person may have alleviated the risk of making them sound ignorant of the context.

Example:

- An example of a reaction to seemingly neutral questions: “Most international organizations had people from abroad who, unfortunately, knew nothing about the context of Poland. Some asked if there was access to drinking water and toilets here in Poland because they simply had their checklists. Sitting in Warsaw, in office buildings, in the Marriott hotel, they asked if there was access to toilets and drinking water here, because looking out the window was too difficult for them". (ULO, big city)

9.1.10. TAKING ADVANTAGE OF IMBALANCES OF POWER IN PARTNERSHIPS

*Both the international and local actors realized that their partnerships were characterized by i*mbalances of power (in favor of the bigger players). Local actors accepted this asymmetry as a fact but protested against abuses of power on the part of the international players. Many of them believed that “partnership” is not the best word to describe these deeply asymmetrical relationships.

Example:

Local actors provided the following examples of international actors taking advantage of their higher position:

- double standards with regard to time discipline (expecting local partners to deliver documentation on time, but then taking weeks or months to review the submission),
- backing away from projects developed together a few days before signing a partnership without communicating the reason,
- delayed payments,
- arbitrary approach to capacity building,
- time-consuming capacity-building requirements which duplicate training staff had already had,
- inflexibility in changing formal requirements (including monitoring indicators and tools), even when the change is justified,
- requiring that funding remains invisible,
- overuse of the term “partnership” in contexts where no negotiations were possible (especially decisions concerning contractual provisions, duration of the project, reporting and monitoring requirements).

9.1.11. HIGH ROTATION OF INGO AND UN EMPLOYEES

The high turnover of staff at the international actors’ offices was challenging for local actors, not only because each new staff member had to be introduced to what had already been achieved in the partnership, but also because turnover interfered with negotiations. As a result,

discussions that local NGOs believed had already been settled were often reopened by newcomers.

Example:

- One representative of a small organization commented on the impact of turnover on their work: “And actually, what [was] very lacking was institutional memory in the sense that you [could] agree on certain things with one person, then a month later another person comes in their place who knows nothing about the agreements that were made, and everything starts from scratch". (ULO)

9.1.12. NATIONALITY-BASED IDENTIFICATION OF PROJECT PARTICIPANTS CONTRADICTING THE CORE VALUES OF MANY LOCAL ORGANIZATIONS

For many of the local organizations involved in the Ukrainian response, prioritizing war refugees in their activities seemed no longer justifiable after the emergency phase of the response. This concerned not only the different treatment of war refugees from Ukraine and the irregular migrants experiencing push-backs at the Polish–Belarusian border[74], but also vulnerable groups that could not count on the support of the Polish public sector institutions or any dedicated public funding, such as LGBTQ+ persons.

Examples:

- This is how a representative of an LGBTQ+ organization commented on this disparity: “I don't like to complain, but such an international partner should know what the situation of LGBTQ+ people in Poland is. We help LGBTQ+ people who come from other countries too… ….it would be nice if there was some balance between this support [for LGBTQ+ persons at risk from Ukraine, or not]… …There are situations where I have money to help people from Ukraine and only them. I don't even have anything for people from Poland – I don't have anything for people from Belarus or Afghanistan, and so on. There is nothing [for them]".

9.1.13. LANGUAGE BARRIERS

The impact of language barriers on the localization dynamics is complex as they arose around three languages (Ukrainian, Polish and English) and one jargon (humanitarian). The two first were the fieldwork languages, and the remaining two were used between international and local actors. In practice, this meant that local actors had to translate their fieldwork into the language of their financing partners. Not everything had to be translated, e.g., contracts were often bilingual, a number of INGOs were ready to provide interpreters for the meetings with

[74] See also: Sarian Jarosz & Witold Klaus (eds.), *The Polish School of Assistance*, p. 9.

their partners, and NGO Forum “Razem” provided live translations of their meetings. Nonetheless, decent English and familiarity with the jargon were default expectations in most partnerships as the main part of bilateral communication (including reporting) was held in these languages. Different kinds of local actors experienced these barriers differently.

Examples:

- Migration sector NGOs were used to multilingual communication and, along with the Ukrainian-led organizations, they were also best prepared to communicate with the incoming refugees. They typically accepted the use of humanitarian jargon and corporate English in communication with their international partners. None believed they had much choice. The domination of the English-language humanitarian jargon made it more difficult for them to communicate their achievements and competences. This was also why they found some of the capacity-development activities frustrating: training was experienced as dull when the main finding was that it taught the participants things they had already been doing under a different name.
- Some local organizations had only a few, if any, members who spoke English. Since organizations which never entered into partnerships were not included in the project sample, we can only guess that language may have been a barrier preventing them from doing so. Such an interpretation may be supported by some of the research results. Firstly, one of the LNGOs participating in the study admitted that they struggled with English and could not always follow what was expected of them in regular communication with their INGO partner. They believed they were a disappointment to their partner and did not expect the project to be extended. Secondly, the INGO representatives who contributed to the study hardly ever considered language a significant barrier to signing partnerships, which is a reason to believe that most of their partners had strong English language skills (and perhaps had even mastered the jargon).

Outliers:

- Polish humanitarian organizations were probably most used to communicating with their partners in both English and humanitarian jargon. In order to provide support to refugees from Ukraine, these actors needed to find more Ukrainian-speaking staff, preferably with some Polish or English. Considering the abundance of Ukrainian talent in Poland, this cannot be considered a barrier.

9.2. ENABLERS

9.2.1 DIRECT FUNDING AVAILABLE

International actors allocated a much higher percentage of funding to partnerships than recommended by the Grand Bargain. This percentage was especially high in the case of INGOs, at 50–100%. Only one organization contributing to this study assessed their direct funding level at the recommended 25%, explaining that the share was lower in the first year and gradually grew in the following years.

Can this also be a barrier? It is unlikely.

9.2.2. FUNDING COVERING OVERHEAD COSTS AND ORGANIZATIONAL DEVELOPMENT

All but one local actor declared their overhead costs were fully funded by their international partners. The outlier organization said they decided to cover the overheads from their own budget. The Grand Bargain recommends that overhead costs are equally shared between partners. The readiness of the international actors to cover the full overhead costs for each project opened the door to partnerships for many local organizations that could not afford to share the costs. A large number of actors said that their international partners had offered them funding for the positions or development activities they asked for. This supported their organizational development and strengthened these partnerships.

Can this also be a barrier? It is unlikely.

9.2.3. RELIABILITY OF L/NNGOS AS PARTNERS

According to the international actors, the vast majority of local actors delivered quality work in the field and made use of their project budgets in line with the mutual agreements. Considering the fact that local actors had the advantage of better access to target audiences and good knowledge of the local context, localization in the Polish case should be described as low risk vis-à-vis the humanitarian standards of project implementation.

Can this also be a barrier? It is unlikely.

9.2.4. HORIZONTAL NETWORKS

Strong ties between organizations of the same level – horizontal networks – had an impact on the course of localization in Poland. The ties that were especially important connected local actors joining cooperation networks, working groups and consortia, or informally sharing knowledge and experiences. Such ties allowed them to coordinate their efforts, share

information about the available funding or share experiences related to partnerships. Networks also helped local actors exercise power in international partnerships. While individual organizations often feared sharing honest feedback with their more powerful partners, networks could voice local organizations' concerns without exposing them to risks. An example of such an empowering function of networks is the *Open Letter to International Donors and Organizations that Want to Help Ukrainian Refugees in Poland*.

Can this also be a barrier? Yes. Strengthening horizontal networks without work on vertical connections (i.e., connections between horizontal networks joining organizations of the same level) may not only facilitate conflict articulation (which is usually beneficial) but can also make conflict resolution more challenging.

9.2.5. REGRANTING AND THE WORK OF MIDDLE-ACTORS

Localization of the Ukrainian response in Poland was partly facilitated by local organizations which were able to mediate between international and local actors. These middle-actors included Polish humanitarian organizations engaging in coordination efforts and/or regranting, as well as Polish NGOs specializing in grant distribution and facilitating development of civil society organizations.

Can this also be a barrier? Yes. One representative of an LNGO which realized projects in partnerships with both INGOs and a Polish NGO that regranted funds from international sources described the latter as "equally difficult", pointing to insufficient communication, changing rules while the project was ongoing, and little flexibility in the Polish partner.

9.2.6. PRIOR NETWORK (FOR INTERNATIONAL ACTORS)

International actors that entered Poland in 2022 had rarely had any previous contact with Polish organizations. Few had cooperated with local actors before, which would have helped them establish further connections and mitigate the bias of proximity (approaching actors in the geographical center of events) and visibility (approaching the most visible actors). These are the outliers that show how big an advantage prior networks are to localization. The outliers include Caritas or the Red Cross. International members of these confederations have immediate access to other member organizations that share the same core values and have some knowledge of how the networks are structured.

Can this also be a barrier? It is unlikely.

9.2.7. HIGH SOCIAL LEGITIMACY OF PROVIDING SUPPORT TO UKRAINIAN REFUGEES

As already mentioned, in the first weeks after the Russian full-scale invasion of Ukraine, the response was led by civil society. This mass mobilization of a variety of actors, with their resourcefulness and energy, prepared the ground for localization. Local actors that were likely to have the capacity and willingness to enter into partnership with an international organization were easy to find in the busiest places of the response. Popular support for their activities made their work easier and encouraged them. Security and social cohesion-related risks undermine the effectiveness of humanitarian response in many places of the world but were minimal in the Polish context.

9.2.8. NON-COMPETITIVE FUNDING

The fact that many of the international actors decided to approach local organizations whose profiles matched their implementation objectives to propose cooperation and support them in project development made it easier for the organizations that had little experience in humanitarian project writing or too few administrative staff (which was often the case in the emergency phase) to enter partnerships.

Can this be a barrier? Yes, transparently announced competitive processes help compensate for gaps in mapping exercises and are especially important for actors that the bigger organizations may not be aware of. Most actors from smaller towns participating in the study were concerned that their peripheral location impacted their access to information about the available funding and development opportunities. Interestingly, overreliance on non-competitive and competitive processes entails the same risk of always strengthening the same actors. Transparent competitive processes should be combined with non-competitive methods of knitting partnerships to prevent "Matthew's effect" of funding accumulation by those actors that are best adapted from the beginning of a humanitarian response.

9.2.9. AUTHENTIC WORK ON IMPROVING PARTNERSHIPS

INGOs' reaction to the *Open Letter to International Donors and Organizations that Want to Help Ukrainian Refugees in Poland* showed that the criticism was treated seriously. An example of good practice can be the work of the Partnership Working Group of the NGO Forum "Razem" regarding passporting local organizations. Participants of the group represent local actors and INGOs. This composition allows them to discuss emerging challenges in partnerships from both perspectives. The group's discussions over passporting explore the possibility of lowering the administrative burden on local actors.

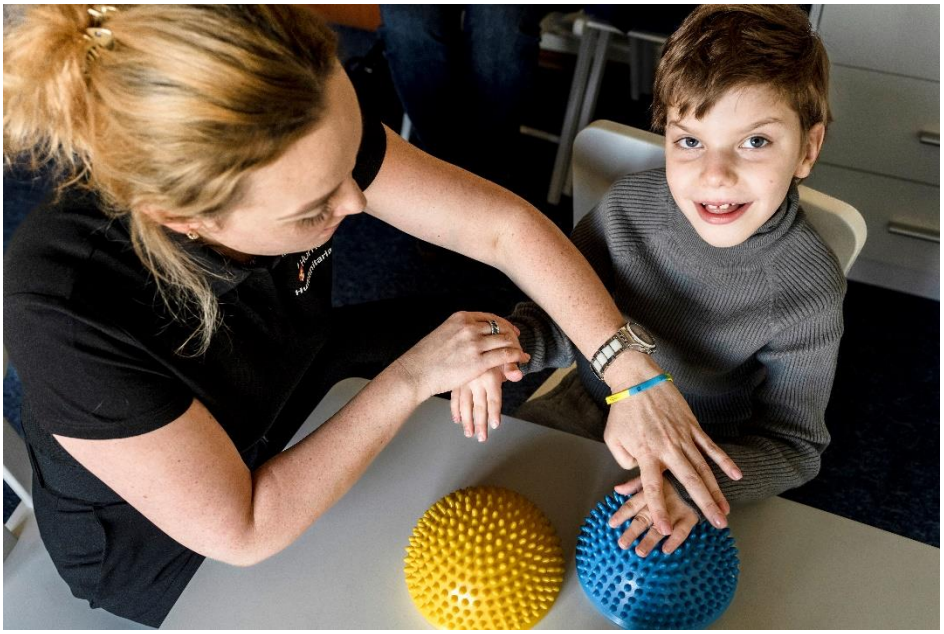
Can this be a barrier? Passporting is not a new topic in the humanitarian debate. The main obstacles to harmonization of due diligence procedures are related to the division of

responsibility (INGOs would have to rely on one another for the quality of the procedure) and the risk of exclusion of organizations which pass some procedures but fail in others, which is a possible barrier to localization if harmonization is not done with sufficient care (e.g., too small or not registered). At the same time, reducing excessive administrative burdens on LNGOs is dependent not only on the efforts of INGOs' country offices, but also (if not primarily) on the decisions of their global offices and their donors. Successful negotiations on one level do not necessarily translate into success on another level.

9.2.10. ACKNOWLEDGMENT OF LOCAL EXPERTISE AND CAPACITY SHARING

As already mentioned in the Barriers section, capacity sharing was rare in partnerships between local and international actors as most international actors focused on supporting the development of local actors rather than on learning from them. Capacity sharing requires the stronger party to recognize that their partner may have higher capacities in their (the stronger party's) area of expertise. In our interviews, we came across four cases of capacity sharing. In two cases, an LGBTQ+ organization was asked to provide training on gender identity for their INGO partner. In the remaining two cases, LGBTQ+ and women's rights organizations were commissioned with the task to capacitate other local actors in their areas of expertise. Capacity Sharing contributes to more-equitable partnerships and strengthens the position of local organizations as experts in their areas of specialization.

Can this be a barrier? It is unlikely.



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10. CONCLUSIONS AND RECOMMENDATIONS

10.1. CONCLUSIONS

As we stressed in the introduction, Poland, as a site of humanitarian intervention, invited an ambitious localization agenda which most international actors pursued. Many of our findings may not apply to contexts where civil society is less active or has less space for action (by 2022, Poland had experienced a decline in democratic institutions and the rule of law but had a vibrant civil society), and they might not be relevant in places where target populations are marginalized by law and not given the chance to integrate into the dominant society (In Poland, and more broadly the EU, treatment of the Ukrainian refugees spared them the fight for basic social rights).

The humanitarian cycle in Poland started with a powerful emergency response led by local actors. Civil society actors and local governments gave impetus to the later activities. Many of these actors grew tired of engagement in the first few weeks or months, or during the first year. The increased presence of international actors, most of whom had established their offices in Poland by July 2022, allowed the actors that were ready for long-distance engagement to build further response on dedicated funding, independent of the gradually falling private donations. Since most of the international organizations decided to allocate a large share of their budgets to direct funding of local actors, they have deeply changed the Polish NGO landscape.

- After nearly two terms (7 years) of a populist government openly aiming to shrink the civic space, the civil society organizations gained access to **abundant international funding for the refugee response**. This funding came with the requirement to professionalize, and it was not always possible to spend this funding on what local actors considered their core activities. Nonetheless, it allowed many actors of the NGO sector not only to implement meaningful projects, but also develop organizationally.
- While many organizations experienced an unprecedented growth, we believe that a few more words should be devoted to the growth of the **Ukrainian-led organizations**. Their contribution to the response was immense. Many of them grew rapidly and perceived their engagement in the response as emancipating. They described their previous position in Polish civil society as being in the background in terms of access to funding and sometimes also public visibility. After the 24th of February, the Ukrainian-led organizations found they were treated as seriously by the international actors as many Polish-led organizations. The established actors recorded an unprecedented rise in private donations. The situation was more complex for those Ukrainian-led organizations

which did not catch the wave or were overlooked by the international actors. Many of them engaged in the response beyond their capacities and sometimes felt treated instrumentally by various actors that sought their experience or referred refugees to them but did not support them in the ways they needed. It should be also stressed that the Ukrainian-led organizations were often women-led, whether established before or after 2022. These women-led organizations accounted for 75% of the Ukrainian-led organizations included in the study (9 out of 12).

- Despite their limited presence in Poland before the 24th of February, **Polish humanitarian actors** emerged as those with most preparedness to do what one of the UN representatives called "heavy lifting": implementation of region- or country-wide projects under typical humanitarian modalities (especially cash support). The response was also new to them: the scale of projects implemented as part of the Ukrainian response matched their large-scale projects implemented abroad. More significantly, they took on roles that were either new to them or not central to their activity, such as regranting. The scale of their presence in Poland has also marked a cultural change in the Polish NGO world, in which organizations whose loyalties to the humanitarian context were stronger than to the civic realm had not played such a prominent role before.
- Two other cultural changes for Polish NGOs include: **participation in coordination structures** and the **adoption of some elements of business management models** in internal management. The Ukrainian response introduced many local actors to the concept of coordination as sharing information and aligning activities with all actors involved in the field rather than just collaborators of choice. At the same time, the response required local actors to adapt to the managerialized implementation regimes of international humanitarian projects. This adaptation was marked by a strong ambivalence but in most cases translated into the introduction of some elements of business management into internal structures.

Involvement in the Ukrainian response has also changed the international actors.

- The response confirmed that states' political decisions are central to the protection and assistance of populations in humanitarian crisis situations. The temporary protection legislation provided a favorable framework for the deployment of a collective humanitarian response to the reception of Ukrainian refugees in Europe, and Poland in particular. This political decision, as well as the robust mobilization of local governments, shaped the reception in the early stages of the response. Humanitarian response models, which by default seek to compensate for the limitations of local and national authorities through substitution, were not adapted to this context, nor were response models derived from situations of irregular migration that coexist in Poland and other European countries. Cooperation with and support for public authorities is not a usual working modality in humanitarian settings where international actors set up international and well-established independent coordination mechanisms. The

coordination model (RCM) enabled a coordinated response, with a diversity of actors involved.

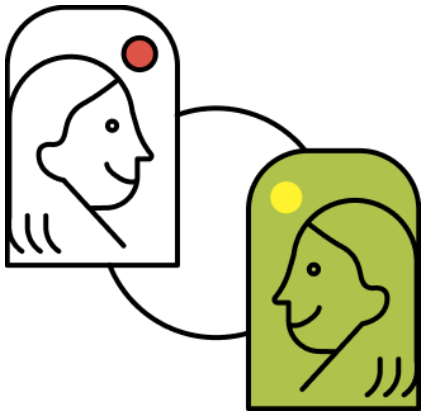
- Implementing projects through local partners was more rational economically and organizationally less challenging for a number of international players. In responding to the crisis, the effectiveness of local governments, the institutions they manage, and the vibrant civil society in Poland invite reflection on the relevance of the 25% Grand Bargain threshold of direct financing for local partners: this percentage should be assessed as low for Poland and similar contexts.
- This experience of entering into partnerships with local actors has highlighted just how rich and multidimensional the concept of localization is. The Grand Bargain localization commitments provided a valuable guideline for international actors, but these commitments did not prepare them for just how much localization turned out to be a question of human relationships and group identities. Recognising each other's value and understanding each other's limitations, history and ambitions became essential to building healthy partnerships.
- The international organizations that played the *de facto* role of donors or intermediaries did not always plan to do so from the start, or they clearly recognized their new role. A more assertive choice would ensure higher consistency of their internal processes and recruitment in this role.
- This experience of a joint response in Europe called into question the international response models and the architecture and standards of humanitarian aid. International actors tried to adapt, but the exercise was sometimes complicated and painful for their teams, who were also under pressure and faced constraints that went well beyond the scope of their responsibilities, involving donor relationships and other systemic issues. The conclusions drawn from this experience underline once more the need for systemic changes within the humanitarian architecture (less administrative burden and more flexible funding, longer-term support, better recognition of the role of local authorities, etc.) and deserve to be shared at an international level so that they can be taken into account in the negotiations linked to the implementation of the Grand Bargain 2.0.

At the time of the finalization of this report, it is Spring 2024. After the October 2023 parliamentary elections, there is hope that the central government will act as duty bearer and ensure a responsible transition. The Ukrainian response is not over yet, and it is not certain how it will evolve. We propose four scenarios that seem to have resonated most with the research participants.

- *Status quo:* The war in Ukraine continues without significant progress on either side of the conflict. New refugees are gradually arriving in Poland due to the worsening state of the civil infrastructure, especially during the winter season. Integration efforts continue thanks to state and EU funding, but the scale of projects is smaller due to the lower level of funding. Most projects are implemented by specialized local NGOs and the state’s social services. Risks: growing anti-Ukrainian sentiment, concentration of

services in large urban locations or near to the border, insufficiency of funding, funding structure not supporting local actors' growth, relocation policies inconsiderate of the well-being of refugees.

- *Dramatic deterioration of security and living conditions in Ukraine:* Ukraine's neighboring countries face the need to receive large numbers of refugees again. Local capacities for a well-organized response are higher, but the popular support may not be as big the second time around. International actors return. Risks: more difficulties in mobilizing donor funding, building partnerships on the existing network without reliable mapping, less popular support for providing aid to refugees.
- *Escalation of the war into Poland*: The response begins anew but in a more militarized context. New needs emerge, including evacuations and provision of aid to inhabitants of Poland. The earlier partnerships provide international actors with an entry point to the new reality.
- *Peace is signed and reconstruction of Ukraine begins:* Most Ukrainians decide to return and NGOs involved in the earlier response look for opportunities related to return and resettlement activities. Depending on the peace treaty, some Ukrainians, including refugees in Poland, may prefer to stay in their country of asylum. Risks: too little support for refugees who decide not to return; uncoordinated or opaque selection of partners for the new activities.



10.2. RECOMMENDATIONS

10.2.1. RECOMMENDATIONS FOR INTERNATIONAL ACTORS THAT ARE STILL IN POLAND

Building partnerships

Finding	Recommendation
The sense that there are common achievements in every project was largely lacking in the research participants' narratives of cooperation. The lack of a common definition of success was partly rooted in too little appreciation of common achievements.	Take stock of your and your partners' common achievements, appreciate efforts, and celebrate success
Many local actors believed that opportunities to provide their international partners with feedback were few and formalized feedback surveys did not allow them to raise their concerns. Typically, local actors did not expect to get feedback or ask for feedback on their overall performance from their international partners, although equitable partnerships would require mutual feedback.	Ask your local partners for feedback and give them feedback. If possible, meet with them in person. Provide a simplified and transparent form of evaluation.
When thinking about the organizational development of their partners, international actors often assumed that adaptation to the humanitarian system in terms of profile and internal procedures was the most desired development scenario for local actors.	Talk with your partners about how they see their future and what would help them at each stage of the humanitarian cycle ahead, including after your exit. Learn more about your partners' capacity to maintain growth or descale responsibly, taking their capacity limitations into account. Prioritize those who face the biggest challenges in your exit development support.

Strategic management and resources allocation

Finding	Recommendation
International actors often offered training or organizational development support based on assessments indicating what their partners may lack to become a humanitarian organization. The future plans of local actors and the foreseeable challenges they may face at various stages of the humanitarian cycle were hardly taken into account.	Be realistic about your own capacities to strengthen local actors. Many of them may not be interested in becoming a humanitarian organization but can still benefit from your support. Adapt your approach to their needs.
International organizations differed with respect to how much attention they devoted to localization. Some aimed to continuously learn from their experiences to develop their building policies and procedures. Others monitored only rough indicators without gathering feedback from their local partners.	Take stock of the benefits of localization for your organization and your target audience. Assess your work with your partners from this perspective: which decisions, systems and procedures helped you achieve the most desirable results?
Local actors pointed out that they often did not know what the longer-term plans of their international partners were. They understood that international actors could only make commitments for as long as their current funding sufficed. Still, to be able to decide whether to continue or phase out their long-term activities (e.g., schools), local actors needed information about the response options considered by the international players in the long term, at the very least.	Consider various development scenarios for the response, and develop response and coordination options, taking into account the lessons learnt from this 2022–2024 period. Make these options known to your local partners, indicating what kind of activities will be prioritized in each case.

Collaboration and exit strategies

Finding	Recommendation
Strong horizontal networks of information sharing and collaboration between INGOs allowed them to identify common localization	Maintain the good relations you've built with other INGOs. Start your new response by joining forces with them as early as possible:

challenges and seek solutions, such as working towards unifying due diligence requirements.	coordinate, share information, and work together to tackle emerging challenges.
The incidence of burnout and humanitarian fatigue were high among local activists, according to the L/NNGOs' representatives participating in the study. This problem was also raised in earlier research.[75]	As part of your exit strategy, support your local partners in dealing with burnout and humanitarian fatigue. Consult your partners on how to do it best.

10.2.2. RECOMMENDATIONS FOR LOCAL ACTORS IN POLAND

Strengthening partnerships and collaboration

Finding	Recommendation
Strong networks between local actors allowed them to coordinate their efforts, share resources, map or win funding, and strengthen their positions in partnerships with INGOs and UN agencies. They proved to be effective coping mechanisms.	Build networks with other organizations similar to yours or prioritize your meaningful participation in existing ones; exchange experiences and join forces in lobbying for a transparent and evidence-based continuation of support for Ukrainian refugees in Poland, as well as broadening this support to other groups of refugees.
Local actors typically did not ask or expect to get feedback on their overall performance from their international partners, although equitable partnerships would require mutual feedback.	Ask your international partners for feedback and give them feedback before your cooperation ends. If you can't initiate a feedback session too, it is not a partnership.

[75] *Where We Are Now*, 16.

Strategic planning and risk management

Finding	Recommendation
Many L/NNGOs implemented their first large-scale organizational projects under international partnerships in this campaign. Many described these partnerships as turbulent. Some admitted they had difficulties assessing the risks related to entering such partnerships or underestimated their capacities. Learning from these experiences can help them assess their actual capacity.	Use your experiences from the response to develop your risk matrix in order to assess projects, partners, and your capacity to engage in projects.
	Identify your organization's strengths developed during the response. They may matter more than risks or weaknesses for your organization's strategy in the years ahead.
Local actors believed the humanitarian response in Poland was not going to be over quickly, regardless of how much international support Poland would continue to receive. Many felt they would be left without much support from international actors, despite the persisting needs of their target audiences.	Make a plan for your organization in relation to its further involvement in the response. Map your funding and partnership opportunities. Consider joining forces with other L/NNGOs.

Health and well-being of staff

Finding	Recommendation
Burnout was reported as a major problem in local organizations. However, little data is available on the frontliners' psychological condition, with most burnout stories focused on management level staff.	Rest as much as possible. Do not overlook the question of burnout in frontliners. They may be more prone to experiencing it than the higher-level staff due to their typically greater exposure to stressors and traumatizing factors, as well as their greater job insecurity. Reinforce MHPSS services for your staff.

Continued coordination

Finding	Recommendation
Coordination forums allowed local actors to get to know each other better and become more aware of their common interests vis-a-vis their partners or funding institutions.	Continue coordinating with other organizations in your field, including those you disagree with or view as competition. When possible, engage in or co-create coordination mechanisms including with local governments and state actors.

10.2.3. RECOMMENDATIONS FOR INTERNATIONAL ACTORS IN SIMILAR CONTEXTS OF INTERVENTION

Strategic partnerships and coordination

Finding	Recommendation
International actors' differing but possibly alignable requirements of their local partners, as well their contracting solutions, contributed to local actors' increased workload.	Coordinate with other international actors as early as you can, including on how to build local partnerships in the most responsible way.
Proximity bias affected distribution of assistance and funding for local actors during the response.	Invest in reliable mapping and make use of it to avoid bias in the selection of partners stemming from geographical proximity to sites where crisis is most visible or from your earlier history of collaborations.
Situations in which the imbalances of power were not fully revealed were especially frustrating for local actors. An example may be negotiations with little actual negotiating space or without the presence of any decision maker from the side of the international actor. Feedback mechanisms were rarely co-created.	Be transparent about the imbalances of power in partnerships, including inequalities resulting from back-donor requirements. When possible, work to redress them. Recognize L/NGOs' added value and create feedback mechanisms together with your partners.

Most international actors were eager to learn more about local actors and their work, but hardly spoke of their own organizations. Some local actors considered not being able to learn more about international actors' experiences in other contexts a lost opportunity.	Introduce yourself to local actors. Asking them to tell you more about themselves and the crisis they are facing is only half of an equitable interaction.
As the geographical scope of the response was wide, area-based coordination was assessed as more effective by many local and international actors.	Consider area-based coordination models. They may be more effective. Moreover, they are likely to strengthen cooperation between local actors operating in the same area in the long run.

Capacity sharing

Finding	Recommendation
Little capacity sharing. The one-directional character of capacity-development activities assumes that local actors should learn from international actors. Examples of good practices involving supporting capacity sharing between local actors by the international ones were rare.	Get involved in capacity sharing. Learn from your local partners. Whenever possible, facilitate capacity sharing between local organizations.
Prevalence of training as a teaching technique.	Explore other ways to share capacities, especially based on learning by doing.
International actors often perceived local actors as "too engaged", although their engagement was largely in line with humanitarian ethics. In some cases, this affected recognition of their work and competencies.	Innovate in terms of growth capacity (e.g., experienced humanitarian staff embedded in local structures or organizations) and link with civil society movements engaged in human rights, migration, or protection issues.
Local actors tend to be more comfortable sharing feedback collectively	Empower your partners through creating opportunities for them to meet and share experiences as well as (collectively) share feedback to you.

Too little awareness of the humanitarian cycle among local actors, thus affecting their planning and preparedness.	Explain the humanitarian cycle to your local partners in order to support their preparedness and planning. Facilitate capacity sharing between L/NNGOs with previous experience in humanitarian crises and L/NNGOs in the new site of intervention.
RLOs tend to have the least resources but the best access to humanitarian audiences. To ensure their full participation in the response, they need to be supported.	Strengthen RLOs to effectively include them in the response. They are likely to have less resources (especially money and public recognition) than other local actors.
Many of the key documents regulating partnerships were only available in English. Ukrainian (the language of most refugees) was rarely recognized as the official language of the response in Poland.	Translate all key documents into local languages (including the languages of the targeted populations) and ensure interpretation during meetings. This will help RLOs keep up with the more established local actors.
Lack of a common definition of success. Too much attention devoted to administrative matters, especially in the second phase of the response.	Work to achieve a common definition of success. Introduce the humanitarian system to the local organizations (not just procedures and standards, but also its core values, institutions and important turns in its history), and recognize that their participation in the response means participation in this global project. Make sure your and your partners' focus stays on the targeted populations and fieldwork. When introducing your partners to office work, explain why it matters from the perspective of the target audiences.

Intermediary role and management of funds

Finding	Recommendation
The role of intermediaries was crucial in facilitating better connections between the two categories of actors. These roles were successfully performed by local grant distributors and humanitarian organizations as well as INGOs allocating most of their funding for direct implementation by L/NNGOs.	Positively accept the intermediary role of INGOs in some contexts and invest in building related organizational capacities internally. Remember that local actors can also be excellent intermediaries. Look for L/NNGOs which were involved in funds distribution before the crisis and seek to include them in the response.
L/NNGOs pointed to changing or unclear compliance requirements in many of their international partnerships. Some of the L/NNGOs based their partnership signing decisions on evaluation of their implementation capacity alone, not taking into account their capacity to deal with M&E, reporting or finances.	Before signing a partnership, be transparent about your requirements and the relevant requirements of your back donor. Make sure your local partners have sufficient capacity to deal with these requirements.
Rotation of international staff without proper handover not only increased the workload of local actors, but also interrupted decision-making processes, e.g., forcing them to re-negotiate solutions already agreed upon.	As much as possible, limit rotation of your staff. In case rotation is unavoidable, ensure proper handover within your organization.
Long-term projects and aligned compliance requirements limit excessive administrative burden on local actors.	Work towards limiting administrative burden on local organizations and extending the timeframe of projects. Invest in harmonization of formal requirements between international actors as well as collectively advocate for reducing administrative burden with donors, and/or to adapt them to the size of projects. At the same time, stay aware of the strengths of your organization's approach to due diligence and try to reinforce them despite harmonization.

Engagement of local and international actors in understanding localization and seeking solutions to emerging challenges was one of the key localization enablers.	Continue to innovate in terms of localization processes and to learn from experiences to improve humanitarian responses.

10.2.4. RECOMMENDATIONS ON CONTRACTING BETWEEN L/NNGOS AND INGOS

Recommendations in this section are addressed to both parties signing a contract. Although space for negotiation is not always vast, most contracts are negotiable and both parties can raise any of the questions from the table below.

Finding	Recommendation
Many good examples of contracting practices can be found among INGOs involved in the Ukrainian response in Poland. The impact of the Partnership Working Group and the Voluntary Guidelines is visible in how agreements changed between 2022 and 2024.	Organize working groups on matters related to partnership and contracting (or keep participating in them). Consider publishing your agreement templates and standards, so that other actors can draw inspiration from your work.
Half of the agreements specify non-Polish law as the governing law of their partnerships. This puts local organizations at a disadvantage in legal disputes.	Local law should be the governing law in contexts (states) where there are actual chances of a fair trial, allowing local organizations better access to resources needed in court cases (such as legal expertise and representation).
Clauses possibly disguising international actors' right to make arbitrary decisions (e.g., references to timeliness without any explanation of how timelines would be established or annexed)	Make sure the language of the contract is specific and unambiguous, especially in sections regulating matters pertaining to finances, disputes, terms of termination and deliverables reporting and approval procedures. As much as possible, minimize imbalances of power between the parties inscribed in the contract.

Lack of translations into Polish and Ukrainian	Ensure translation of all key documents into the relevant local languages right from the start of the response.
Clauses related to risk assessment were often elaborated by INGOs instead of together with their local partners.	Local actors may be more competent to assess many of the implementation-related risks. They should be included in their elaboration because these clauses should effectively protect all parties to the project.
Terms of termination of agreement vary greatly between INGOs, with some favoring equalized partnerships, and others giving a clear advantage to the stronger party (INGO).	We strongly recommend against clauses giving international partners the power to arbitrarily terminate a partnership, such as admitting the possibility that this party terminates a partnership “at their convenience” or in circumstances they have the full power to define.
Capacity assessments and plans, due diligence references, and partners' performance report templates are scarce in most of the agreements.	Engage with your partner in discussions on performance before sealing the agreement. Ensure that a performance review mechanism and a progress plan are in place, with a timeline for redress.
Clauses on cost eligibility and ineligibility criteria for eligible costs were not always available and detailed, or they were not supported with links/annexes to the agreement’s financial procedures (Ex. staff costs, travel and subsistence, taxation)	Cost eligibility and ineligibility should be detailed further in the agreement or as part of financial procedures linked/attached to the agreement.
INGO Donor regulations were not always defined in the agreements when referred to.	If the contract refers to Donor regulations, make sure they are defined or annexed.
Monitoring and evaluation were underregulated considering the expectations of local actors. which require a clear division of labor.	It is recommended that a monitoring and evaluation plan or the procedure by which it will be elaborated are specified in agreements.
Most of the agreements lack specific details concerning the percentage of the total budget covered by the funding agency.	It is recommended that agreements indicate this percentage, even when the funding agency fully covers the total budget.

10.2.5. RECOMMENDATIONS FOR HUMANITARIAN DONORS

Finding	Recommendation
Re-granting facilitated better access to funding for smaller L/NNGOs. At the same time, larger and more experienced L/NNGOs proved to be ready to compete with INGOs for funding in UN calls.	Support creation of funding mechanisms adapted to specific country or regional contexts. In contexts similar to Poland, support both re-granting and direct funding to L/NNGOs. Ensure the percentage of overhead costs for regranting which should be covered by international actors is specified in requirements.
INGOs working towards limiting administrative workload on their local partners pointed to obstacles related to upstream compliance requirements.	Support international actors' efforts at harmonization of compliance requirements in order to relieve local organizations of excessive administrative burden. Work together with international and local actors to find solutions, which ensure transparency while limiting administrative workload. As much as possible, react flexibly to the emerging challenges in order to support localization.
International funding for coordination mechanisms facilitated their development and stable operation.	Allocate funds to support coordination that prioritizes the existing local or national coordination mechanisms.

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Do you want to talk about the findings?

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