



Why Wait?

How the Humanitarian System Can Better Fund Women-Led and Women's Rights Organisations

International Rescue Committee | June 2023

List of Acronyms

AHF	Afghanistan Humanitarian Fund	IRC	International Rescue Committee
CBPF	Country-Based Pooled Fund	KII	Key Informant Interviews
CSO	Civil Society Organisation	NGO	Non-Governmental Organisation
DI	Development Initiatives	OCHA	Office for the Coordination of Humanitarian Affairs
DRC	Democratic Republic of the Congo	UHF	Ukrainian Humanitarian Fund
DRC-HF	DRC Humanitarian Fund	WRO	Women's Rights Organisation
GBV	Gender-Based Violence	WLO	Women-Led Organisation
GBV AoR	GBV Area of Responsibility	WPHF	Women's Peace and Humanitarian Fund
IASC	Inter-Agency Standing Committee	UN	United Nations
INGO	International Non-Governmental Organisation	UNFPA	United Nations Population Fund

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Front cover: Members of the community-based organisation Tupendane, which provides support to survivors of GBV and works to prevent GBV in their community. *Kellie Ryan/ IRC*.

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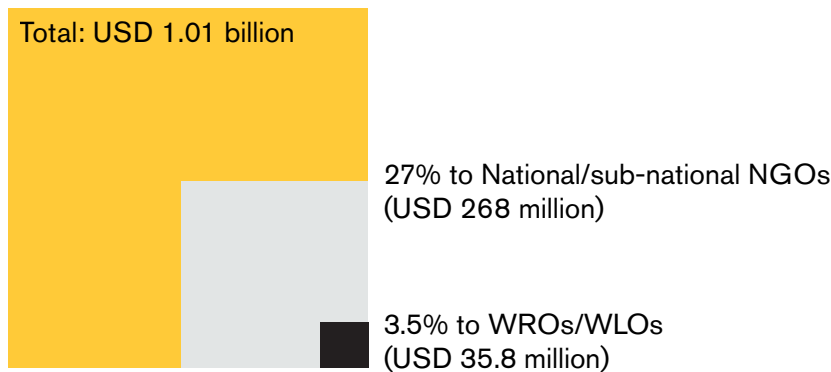
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Executive Summary

Women's rights and women-led organisations (WROs/WLOs) are a critical driving force in providing effective gender-based violence (GBV) prevention and response services to women and girls impacted by conflict and displacement. WROs/WLOs are the best placed to understand the needs of women and girls and deploy context-specific strategies that can make a lasting impact to increase gender equality and end GBV. Organisations that root their response in feminist thought have long been championing increased partnerships and funding to WROs/WLOs.¹ Through this sustained advocacy the role of WROs/WLOs is increasingly recognised within policy by donors, the United Nations (UN), and international non-governmental organisations (INGOs)² under the wider rubric of localisation.³

Despite this rhetorical recognition at policy level, funding to WROs/WLOs has been and remains incredibly low. WROs/WLOs face different and persistent barriers than other national and sub-national organisations. The Women's Peace and Humanitarian Fund (WPHF) found that 90.7% of WROs/WLOs feel that their organisation's existence is at risk due to lack of institutional funding or core funding. The UN Office for the Coordination of Humanitarian Affairs (OCHA) reported that it allocated only 35.8 million of its Country Based Pooled Funds (CBPFs) to WROs/WLOs in 2021, which is a mere 3.5% of the total sum.⁴ In contrast, OCHA successfully distributed 27% (US\$268 million) of its US\$1.01 billion CBPF allocation directly to national and sub-national organisations in the same year.⁵

CBPF allocations to WROs/WLOs relative to total allocation and allocations to NNGOs, 2021.



Source: OCHA County-Based Pooled Funds 2021 in Review.

This report provides analysis and insights from across three contexts, Afghanistan, the Democratic Republic of the Congo (DRC), and Ukraine, to reveal the pervasive systemic barriers to WROs/WLOs accessing humanitarian funding. The qualitative analysis is centred on the lived experiences of WROs/WLOs working on GBV prevention and response as they seek to access funding and build partnerships with international actors. The quantitative data focuses on one funding mechanism, the OCHA CBPFs (which has met its 25% localisation target globally), as an example of the wider challenges and opportunities for increased funding to national and sub-national organisations addressing GBV. The report is not exhaustive but, through its focused sample of primarily national and some sub-national WROs/WLOs, as well as international organisations, provides a window into the barriers and opportunities for increased funding for national and sub-national WROs/WLOs. The feedback generated from across the three contexts of this report coalesce around a few major themes:

- WROs/WLOs struggle to meet many of the application criteria and requirements necessary to secure CBPF resources. These include fund sizes that are too large for many WROs/WLOs, the inability for funding applications to be made in local languages, and requirements for WROs/WLOs to have written policies in place specific to partnering with the UN. Respondents also reported the tendency of CBPF awards to go to relatively larger, well-established organisations that already have a track record of partnership with the UN. These factors create a bias against smaller WROs/WLOs with no previous partnership profile and those with limited resources to invest in meeting UN requirements, which can foster unequal power relations within national and sub-national civil society. Additionally, evidence in this report suggests that WROs/WLOs experience a double-disadvantage when it comes to accessing funding, both as national or sub-national organisations competing with international and national actors for funds, and additionally as organisations being run by or focusing on women within wider patriarchal systems.
- The absence of WROs/WLOs in leadership and decision-making related to CBPF allocations contributes to the pervasiveness of barriers described above. This includes the historical lack of inclusion on CBPF Advisory Boards, which play a key role in working with the Humanitarian Coordinator (HC) regarding the strategic vision of each country fund and distribution of funding.⁶ The lack of inclusion in leadership opportunities and decision-making processes emerges as a wider theme across all three contexts, beyond the scope of the CBPFs. For instance, despite progress over recent years to include more WROs/WLOs in country level GBV coordination structures, such as the GBV Sub-Clusters and other humanitarian fora, respondents reported being relegated to providing information within humanitarian processes, rather than being able to lead decisions about response priorities and activities. This raises critical questions regarding the international humanitarian system's appetite and ability to share power with WROs/WLOs.
- Quantitative analysis tracking CBPF allocations for GBV interventions in Afghanistan, DRC, and Ukraine shows how these barriers play out in cents and dollars for national and sub-national organisations. CBPF allocations going to national and sub-national organisations for GBV interventions have fallen in Afghanistan from 2017-2022, and the localisation target of 25% was not met for CBPF allocations to GBV in Afghanistan and Ukraine in 2022. The proportion of CBPF allocations for GBV going to national and sub-national organisations has increased in DRC over the last several years, meeting the 25% localisation target in 2022.

The insights in this report contribute to a growing critique from feminist humanitarian organisations that progress on localisation is too slow, too unambitious, and that WROs/WLOs in particular continue to be marginalised. And yet, WROs/WLOs agree that positive practices regarding funding and forming partnerships do exist. These include international actors being willing to adapt funding amounts and funding criteria, increased flexibility, and partnerships based on mutual respect and understanding. The report compels us to ask the question, "Why wait?" to implement these practices and fund WROs/WLOs. The recommendations point to specific changes that can be made at both operational and policy level, allowing the insights to be a resource for policy makers who are keen to drive reform of the multilateral system they fund and to ensure their commitments to localisation, feminist approaches, and aid effectiveness can be realised.



Training for community health volunteers. *Kellie Ryan/ IRC.*

Recommendations

Recommendations below are based on analysis of the evidence generated for this report, as well as direct inputs from WROs/WLOs from across Afghanistan, DRC, and Ukraine included in this study.



OCHA



INTERNATIONAL
NGO



DONOR/
MEMBER/
STATE



GBV
AOR

Funding for WROs/WLOs:

UN agencies, donors, and INGOs should critically interrogate their funding criteria, learning from changes and successes of other actors, to identify barriers for WROs/WLOs and then modify their policies to better meet WROs/WLOs where they are. Recommendations include:

- Reform criteria for CBPF applicants that continue to be prohibitive to WLOs/WROs across sectors, including removing the minimum fund threshold, allowing applications in relevant languages, and making it easier for organisations who have not previously worked with the UN to successfully access funding.



- Provide support to enable WROs/WLOs across sectors to develop operational policies required by the UN, through small grants and technical support via Humanitarian Coordinators and CBPF Advisory Boards.



- Meet localisation commitments within each cluster, inclusive of the GBV sub-sector, by ensuring that a minimum of 25% of GBV allocations through CBPF go to WROs/WLOs directly.



- Ensure that funding that is sub-granted to WROs/WLOs is passed on with the same level of flexibility and duration as it was received, including with core funding.




- Scale up resources to feminist funds that are already WRO/WLO-friendly in their processes and practices, so that feminist funds can increase grant-making in humanitarian contexts and to GBV-focused WROs/WLOs.




Leadership and decision-making of WROs/WLOs:

UN agencies, donors, and INGOs must cede leadership and decision-making roles for WROs/WLOs across all humanitarian fora, such as Advisory Boards and clusters/sub-clusters, and within program design. International actors should also engage strategically with existing networks of WROs/WLOs, meeting organisations where they are. Recommendations include:


- Reform CBPF Advisory Boards to achieve equal representation between international and national representatives, with WRO/WLOs making up at least half of the national representation.




- Systematise leadership space for WROs/WLOs, including by increasing the number of WROs/WLOs that co-lead country and sub-national GBV AoRs/Sub-Clusters, to drive increased accountability to WROs/WLOs.



- Increase the membership of WROs/WLOs in GBV Sub-Clusters so that there is a critical mass of WROs/WLOs as decision-makers within Sub-Clusters, and remove barriers to participation in these Sub-Clusters by providing financial resources and capacity sharing initiatives.




- Ensure the Inter-Agency Minimum Standards for GBV in Emergencies Programming (GBV Minimum Standards) are accessible and relevant– including translations into relevant languages – and contextualised in partnership with WROs/WLOs.




Accountability to WROs/WLOs, and equitable partnerships:

UN agencies, donors, and INGOs such as IRC, have made numerous commitments to localisation of the humanitarian system and to WROs/WLOs. They now have a duty to deliver and establish partnerships that prioritise equity, trust, and accountability. Recommendations include:


- Improve tracking and transparency of funding to WROs/WLOs based on the forthcoming updated Inter-Agency Standing Committee (IASC) definition of WROs/WLOs, with donors holding UN agencies and INGOs accountable by requesting information on funding to WROs/WLOs and GBV.




- Increase the number of partnerships that international actors have with WROs/WLOs and the quality of these partnerships with WROs/WLOs, in line with feminist principles, throughout the entire funding and project cycle.



- Translate positive practice and lessons learned on increasing leadership and funding for WROs/WLOs into effective policies, including through initiatives like the What Works to Prevent Violence against Women and Girls Programme and from actors including feminist funders and the Call to Action on GBV in Emergencies.



- Ensure diversity of WROs/WLOs which receive pooled funding to increase inclusion of sub-national WROs/WLOs and solidarity between larger/national WROs/WLOs and smaller/sub-national WROs/WLOs, including by sharing expertise and knowledge.



Introduction

Women-led and women's rights organisations (WROs/WLOs) are the first responders to GBV in their communities, and evidence shows that strong feminist movements play a direct role in advancing gender equality and securing rights for women globally.⁷ WROs/WLOs are so important, and yet they are drastically underfunded. According to DI, national and sub-national actors received only 3.1% of gender-relevant aid in 2020, which represented a decrease since 2018, when that figure was 4.8%. And this figure encompasses funding to all national and sub-national actors – meaning that WROs/WLOs likely receive just a fraction of this already small proportion.

The growing body of evidence shows that WROs/WLOs have historically been, and remain, on the margins of the humanitarian sector. There also there remain key gaps in research such as understanding what proportion WROs/WLOs represent among national and sub-national organisations, a figure which likely varies across contexts. This is despite the sector having launched the Grand Bargain localisation agenda in 2016, which called upon international actors to channel at least 25% of their funds to national and sub-national actors – including women-led civil society.⁸ Many international actors have still not met these funding targets and there has been growing criticism by feminist civil society of the slow pace of progress to meaningfully shift power and decision-making to WROs/WLOs, and to remove the barriers to equitable partnerships. Like many other INGOs, the IRC is adapting its policies and practices related to funding national and sub-national actors, including WROs/WLOs.⁹ In 2022, the IRC joined other INGOs in becoming a signatory of the Pledge for Change, a Global South-led initiative committed to equitable partnership, authentic storytelling, and influencing to drive wider system change.¹⁰

Note on terminology:

The majority of organisations interviewed self-identified as either a “WRO” or “WLO”, and accordingly those terms are used throughout the report. The terms “national actor” and “sub-national actor” are used in favour of “local actors” throughout the report, other than in quotes from respondents, where original language is maintained.

This report looks in detail at OCHA's CBPFs, the largest pooled funding mechanism, and one whose purpose is to facilitate rapid fund dispersal, including to national and sub-national organisations.¹¹ Although CBPFs constitute a minority of overall humanitarian funding, their volume is growing year-on-year, and they are cited by donors as a key tool for advancing localisation.¹² This report looks at their potential for increasing funding to WROs/WLOs. Building on the publicly available data on CBPF allocations by sector, the analysis below seeks to plug some of the evidence gap by concentrating specifically on CBPF funding to WROs/WLOs working on GBV prevention and response, sourcing quantitative and qualitative analysis from across three countries: Afghanistan, Ukraine, and DRC.

This report builds on previous reports that have tracked how the humanitarian sector prioritises and funds the response to GBV. In 2019, the IRC and VOICE published “Where is the Money?”,¹³ uncovering that a mere 0.12% of global humanitarian funding was being allocated to GBV. In 2020, “What Happened?”¹⁴ measured the lack of funding to GBV in the Covid-19 Global Humanitarian Response Plan. In 2021, “Why Not Local?”¹⁵ brought forward evidence from WROs/WLOs who described being stuck in a vicious cycle of underfunding where they only receive short-term and indirect funding that is not designed for sustainability or growth. This sustained analysis has contributed to a wider advocacy movement – in large part led by WROs, WLOs, feminist activists, and feminist funders – that has succeeded in driving increased recognition of the importance of funding WROs/WLOs.¹⁶



Annika and her mother, Anna, share a small studio apartment in a building designated for internally displaced persons.
Diana Zeyneb Alhindawi/IRC

This report draws on qualitative and quantitative data focusing on three countries: Afghanistan, the DRC, and Ukraine. Qualitative data is based on interviews and group consultations with primarily national and some sub-national WROs/WLOs,¹⁷ alongside interviews with stakeholders in the humanitarian sector, in each context. Quantitative data focuses on data from CBPF allocations and analysis by DI. Full information regarding report methodology can be found in the Annex. This report is divided into three sections: section one deep dives into barriers and opportunities for WROs/WLOs to access CBPFs; section two looks at power and partnership dynamics that negatively impact this funding while also spotlighting positive feminist funding practices cited by respondents; and the third section asks “Where is the money?,” providing a snapshot of the allocations of CBPFs for GBV projects for national and sub-national organisations across Afghanistan, DRC, and Ukraine.

Defining WROs/WLOs:

Organisations and international actors cite that it can be challenging to define who is a WRO/WLO, with critical questions arising relating to the gender composition of organisational leadership and the organisation's self-defined mandate and identity, not to mention the fact that WROs/WLOs are not a homogenous group. Despite these challenges, a definition can be critical to enable tracking of funding to WROs/WLOs. Multiple groups have therefore taken on the work of providing such a definition; for instance, the IASC Gender Reference Group is currently undertaking an exercise to find a definition of WROs/WLOs that can work across the humanitarian system.

Section 1:

Accessing CBPFs

"Donors have difficult criteria that local organisations like us cannot meet. We are the only women's organisation in this province, and we don't get any funding."

– WRO/WLO

Prohibitive processes and criteria

All WROs/WLOs interviewed for this study cited the eligibility criteria for CBPFs as the single largest barrier to accessing this funding. Interviewees shared that prohibitive eligibility criteria (with specific eligibility barriers discussed below) that can be challenging for even larger and relatively well-established organisations to navigate, are proving insurmountable for smaller, community-based organisations, who often lack the staff and budgets to invest in these processes.

Most frequently mentioned barriers by respondents regarding WROs/WLOs access to CBPFs:

- Minimum fund threshold is too high;
- Requirement for internal organisational policies, such as those on Protection from Sexual Exploitation and Abuse (PSEA) and Accountability to Affected Populations (AAP), but no funding provided to develop these policies;
- Application not submissible in local languages;
- Previous experience with humanitarian work and funding/Previous experience with UN agencies preferred;
- Lack of WROs/WLOs on CBPF Advisory Boards.

Minimum fund threshold

Although the figure varies by context, minimum thresholds for funding commitments was cited as a core challenge excluding WROs/WLOs from receiving funding for GBV projects.

"Fund size is too big for local WLOs to demonstrate previous capacity on and to absorb now. [It is] impossible for small feminist organisations to be funded by big donors. Donors/CBPF declare that they would like to have more women-led organisations but again, women-led organisations can only start with small funds, say for instance for US\$15,000. Let them implement smaller funds, report back, and in few months, they can apply for bigger amounts." – WRO/WLO

"Minimum budget allocation [of CBPF] is US\$500,000 [in this context], which is too much for local organisations to absorb. In order to qualify, local woman's organisation must first get such funding (from elsewhere), implement a project worth this much and then ask for partnership with humanitarian partners where will they get funded for US\$500,000 in the first place." – WRO/WLO

In 2022, the DRC CBPF reduced the minimum fund threshold. Quantitative analysis shows that CBPF funding for GBV to national/sub-national organisations did increase from 2021 to 2022 (See Figure 3 on page 23). However, minimum fund allocation amounts may remain too high for many WROs/WLOs, who have historically operated with smaller funds. WROs/WLOs must compete for access to larger grants with INGOs and other WROs/WLOs that have a prior track record of managing larger grants, which can limit innovation and foster unequal power relations within national and sub-national civil society.

Organisational policies

As part of preliminary screening for CBPFs, organisations are required to have a variety of existing policies including Code of Conduct, Anti-Fraud, Conflict of Interest, Protection from Sexual Exploitation and Abuse (PSEA), and Accountability to Affected Populations (AAP).¹⁸ Although these are considered standard policies for international actors, they are not necessarily part of the internal organisational policy framework of WROs/WLOs within their domestic legal requirements. This means national and sub-national organisations tend to develop these policies in response to their contractual agreements with UN agencies and INGOs. Organisations that have not yet been funded by mechanisms that require these policies may not have them already in place or may not even be familiar with them.

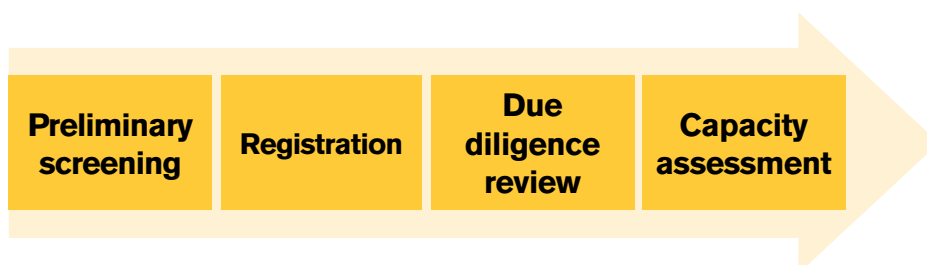
The result is that eligibility criteria for CBPF at the preliminary stage of qualification is far more likely to be fulfilled by organisations that are already participating in the international humanitarian system. Meeting all the requirements set out in the preliminary screening stage is an arduous process that requires organisations to allocate internal human resources and funding away from direct project delivery. Smaller WROs/WLOs rarely receive unrestricted or flexible funding that can be reallocated for fundraising and organisational development.

"We are planning to apply [for qualification] to be partner of the fund, but you know, it's a lot of process and a lot of diligence and a lot of complication." – WRO/WLO

"In Ukraine, there are a lot of small organisations smaller than ours, and they're very active in helping women who are involved in GBV but unfortunately, they don't have the resources to grow and develop the way we do and therefore they don't have a possibility to participate in such proposals and such competitions and receive funds." – WRO/WLO

WROs/WLOs are employing a range of tactics to overcome these systemic barriers, but report requiring additional investments of funds and staff time. For example, one respondent in this study has hired an external consultant to support them in developing policies and systems as required by the CBPF, and another is participating in a year-long capacity initiative.

Eligibility process for CBPFs for non-UN organisations and to determine level of risk associated with partners



Application not possible in local languages

In Ukraine and Afghanistan, language emerged as a barrier to accessing CBPFs and engaging in wider humanitarian organisation structures. Organisations shared that information sessions and training on CBPFs are largely held in English and the online application portal is in English. Not only are organisations required to write applications in English, they must also submit translated versions of all documents such as financial reports, narrative reports, and organisational policies. Employing translators is costly and time consuming for most organisations, particularly for WROs/WLOs organisations with small organisational budgets and limited or no core funding.

Proximity and exclusion

Previous experience with humanitarian funding/UN agencies

If organisations do qualify in the preliminary assessments, WROs/WLOs shared that they face barriers at subsequent levels of assessment. Government donors, the UN, and INGO partners can exclude organisations that are “outsiders” to the system, who lack established partnerships and relationships with the UN or INGOs. Responses from across Afghanistan, DRC, and Ukraine show this favouritism for established partners, with one organisation struggling to access the fund and another having been successful.

“Donors prefer to fund INGOs because they have a history with them. New partners are a headache for them.” – WRO/WLO

“Found [CBPF] proactive, with very good communication. They were responsive when we had questions. Very good information sessions on how to apply, that was very helpful. We have been working within the United Nations system for many years so the process was not difficult for us.” – WRO/WLO

As several respondents noted, greater inclusion of WROs/WLOs in CBPF funding requires CBPFs to change their criteria to make it inclusive of a diverse range of organisations and meet WROs/WLOs where they are.

“In order to enable more organisations to receive direct funding, the CBPF needs to change some of their requirements. For example, the requirement that organisations should have more than 10-12 years of experience and that they should have previous experience of managing funds worth US\$10 million.” – International actor

Impact of exclusionary criteria on localising GBV funding

The impact of these multiple funding barriers for WROs/WLOs is that CBPFs are falling short of meeting their 25% localisation targets for funding when it comes to GBV prevention and response. Quantitative analysis of CBPFs across 2017-2022 shows the average proportion of CBPF funding for GBV projects going to all national/sub-national organisations was 24% in Afghanistan and only 17% in DRC, figures which are falling in Afghanistan but rising in DRC. In contrast to the GBV sector, the overall proportion of CBPF funding to national/sub-national organisations across all sectors was 21% in Afghanistan and 44% in DRC.

As WROs/WLOs as a specific category of national organisations are not currently tracked in publicly available data on CBPFs, it is not possible to know what percentage of funds were received by WROs/WLOs. However, the lived experiences of WROs/WLOs outlined above show that WROs/WLOs face disproportionate barriers to accessing CBPFs that are embedded in funding processes and criteria.

"No more than three WROs have been funded by the CBPF in this country, and only one of them on GBV. Most WROs/WLOs don't have access to it because there are too many criteria, and it is not easy for WROs/WLOs to meet these requirements."

– International actor

And WROs/WLOs only face these barriers if they get the chance to apply. Respondents reported that in Afghanistan in 2022, application calls for reserve funding for CBPFs for GBV were not circulated to WROs/WLOs.

"Not a single women-led or women's organisation applied for GBV funding to the CBPF in the past year. GBV-related funding was part of reserve allocations of the AHF, which are closed call for applications, and these were only circulated to INGOs. We were inviting mostly INGOs with the request to sub-contract (to national/sub national) implementing partners. We were supporting majority INGOs, because they had bigger reach, and at the same time, bigger possibility to retain the funds in a quicker way. And to spend them." – **International actor**

Unlocking barriers to funding

CBPFs can be a useful tool for driving quality funding to national and sub-national organisations, including WROs/WLOs. Flexibility, one of the CBPF five principles,¹⁹ was cited by one respondent who had been able to access CBPFs.

"[CBPF] is much more flexible and adaptive than other donors. Where there is a change in the context and we want to divert funds to other areas or needs or aspects, we communicate with them and they understand and they allow us. [CBPF] publishes calls for proposals based on broad humanitarian strategy for (the country) based on needs assessment and based on advice from different clusters. We just have to follow the broad strategy that is already decided and align with it." – **WRO/WLO**

Responses in this study also signal a number of positive developments in some contexts that can be built on to increase inclusion of WROs/WLOs in CBPFs (see "Country specific funding reforms" section).

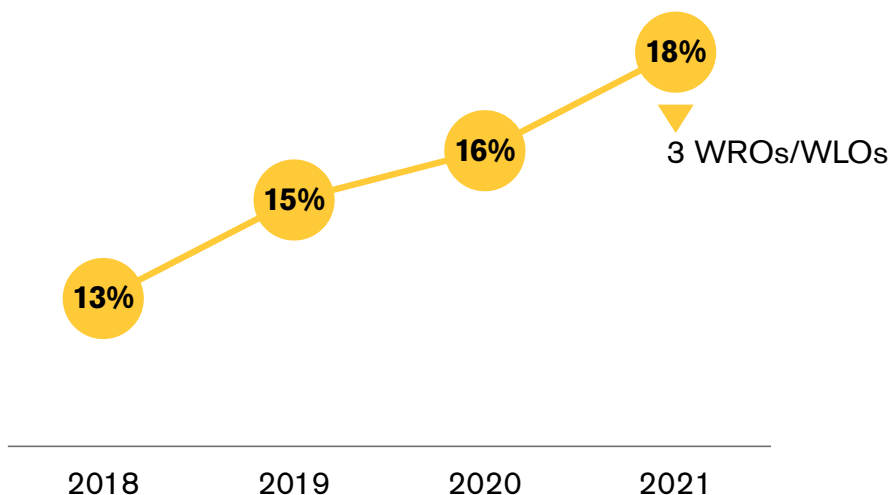


Women in Afghanistan queue for cash distributions. *Kellie Ryan/ IRC*

Increasing representation of WROs/WLOs on CBPF Advisory Boards

CBPF Advisory Boards hold responsibilities across four areas: strategy (including determining funding priorities), risk management, performance, and transparency.²⁰ Greater inclusion of WRO/WLO perspectives and expertise in CBPF Advisory Boards can be a driver of unblocking process barriers and changing tendencies in the funding decision-making outlined above. Positive progress reported at global level by OCHA show an increase of representation of national NGOs on CBPF Advisory Boards from 13% in 2018 to 18% in 2021 and the new "CBPF Global Guidelines" include a commitment to have at least one WRO/WLO representative on each advisory board (see figure below).

National NGO representation in CBPF Advisory Boards, 2018-2021.



The picture is less progressive for WROs/WLOs, who represented only 7% of the total national NGO representation (3 WROs/WLOs out of a total of 41 national NGOs) as of latest data from 2021,²¹ meaning that they represent an even smaller proportion on Advisory Boards when you consider all actors, not just national NGOs but also UN agencies, INGOs, and donors.

As of the latest publicly available data from 2021 CBPF reports, DRC is the only context in this study that has equal representation of national NGOs alongside other actors – including UN agencies, INGOs, and donors – on its CBPF Advisory Board. It has also made an explicit strategic commitment since 2022 to increase the participation and capacity building of national WLOs,²² which is supported by the participation of a Gender Advisor. These reforms sit alongside the increase in the proportion of CBPF allocations for GBV going to national/sub-national organisations in DRC in the last year (See Figure 3 on page 23).

The three contexts in this report have recently included WROs/WLOs on their Advisory Boards, which is a significant and welcome development. OCHA has championed reforms, through processes like the Pooled Fund Gender Contact Group²³, including calling for the mandatory inclusion of gender experts and WLOs/WROs in strategic decision-making processes such as Advisory Boards, alongside tracking of the gender composition of CBPF Advisory Boards. However, progress towards greater inclusion will need to accelerate if OCHA is to meet its commitment of having one-third of national representation on the Advisory Board be WROs/WLOs, as laid out in the 2022 CBPF Global Guidelines.²⁴

A lack of representation of women-led civil society on Advisory Boards means that their perspectives are unlikely to be taken on board and that the long-established selection criteria favouring bigger, well-established actors will continue to be used. In Ukraine, some respondents felt that localisation was not strategically prioritised and, as a result, exclusion of WROs/WLOs remained prevalent.

“Localisation is a secondary objective of the CBPF. We don't prioritise any organisation because it is a local, national, women-led organisation; we look for which organisation is best suited to deliver a particular type of assistance.” – International actor

The above quote illustrates the different drivers underpinning the dispersal of CBPFs. As this report has highlighted, prohibitive criteria and practices creates a systemic bias that, unless explicitly addressed, can completely exclude WROs/WLOs from funding. This is reflected in the quantitative analysis on the Ukraine CBPF, which shows that, in 2022, all funding for GBV projects was given directly to the United Nations (UNFPA), with only a small amount being sub-contracted to two national/sub-national organisations (See Figure 5 on page 24). This in a context where WROs/WLOs, networks, and coalitions have a long history of promoting gender equality, women's empowerment, and women's rights.²⁵

Including WROs/WLOs in CBPF Advisory Boards is both a driver and a result of increased funding to WROs/WLOs, while a lack of inclusion continues to be a barrier to enabling direct funding. This in turn has an impact on CBPFs' ability to meet their localisation targets for GBV funding. Quantitative analysis from Ukraine, for example, demonstrates that CBPF GBV allocations to national/sub-national organisations is far lower than the aggregate across all sectors, where 23% of total CBPF fund allocations across all sectors went directly to national/sub-national organisations in 2022.²⁶

Country specific funding reforms

This section has demonstrated that the criteria for receiving CBPF funding for GBV programming are prohibitive for many WROs/WLOs. Yet, we could also observe positive reform efforts. The recently launched new "CBPF Global Guidelines" highlight the value of partnerships with national and local expertise in GBV prevention and response programming. They include, for example, a commitment that 25% of NNGOs trained should be WLOs/WROs. Going forward project proposals submitted by a WLO or WRO will be given an additional score. To ensure these positive reforms take effect throughout the individual funds the rollout of the guidelines needs to put emphasis on the specific support for female-led civil society. The table below shows examples of practical steps to drive increased CBPF allocations to national and subnational organisations as cited by respondents.

Fund	Existing reform	Examples of further reforms to increase funding to WROs/WLOs
Ukraine Humanitarian Fund (UHF)	Additional US\$20 million allocated to 300 CSOs supporting humanitarian response in 2022; INGOs and national NGOs required to partner with smaller (i.e. sub-national) NGOs.	Prioritise strategies to remove barriers to funding for WROs/WLOs by simplify application processes, providing smaller grants, ²⁷ and including WROs/WLOs on Advisory Boards.
DRC Humanitarian Fund (DRCHF)	Fund prioritising localisation by requiring INGOs/UN to demonstrate their added value and partner with national or sub-national organisation(s).	Bolster existing good practices to include WROs/WLOs on CBPF Advisory Boards ²⁸ and continue to integrate wider best practices from feminist funds (e.g. Women's Peace and Humanitarian Fund).
Afghanistan Humanitarian Fund	UN Women launched a specific funding round for WROs/WLOs; in 2022 one WLO and one WRO became members of the AHF Advisory Board; each Review Committee had WLOs/WROs represented; allocations prioritise consortia and partnerships between international and national partners.	Providing funds for WROs/WLOs to meet eligibility criteria (e.g. donors/ UN funding audits and incentivising capacity-sharing partnerships between WROs/WLOs and INGOs ²⁹); facilitate relationship building between WROs/WLOs and donors, and create funding specifically for WROs/WLOs. ³⁰

Section 2: Leadership and strategic decision-making

The lack of funding from CBPFs to WROs/WLOs is indicative of a wider imbalance of power between international agencies and national and sub-national organisations within the humanitarian system. This perspective is central to the feminist critique of the humanitarian system and has been acknowledged by international organisations who have signed up to localisation commitments in the Grand Bargain and initiatives like the Pledge for Change. While it is essential to make improvements to CBPFs criteria to remove the barriers to funding outlined in Section One of this report, it is also vital to champion feminist partnerships that can create a more equitable sharing of power between international and national and sub-national actors working on GBV prevention and response.

Respondents in this report shared their lived experiences of negotiating power differentials in the humanitarian system and the negative impact unequal partnership has on WRO/WLO's ability to access sustainable quality funding.

Power sharing in funding partnerships

"[The] relationship between international NGOs/UN and national NGOs is one of superiority. International organisations take most of the funds and national NGOs do most of the work. They give us funds only for activities and do not think of the future of national NGOs." – **WRO/WLO**

In the current international funding environment, WROs/WLOs are likely to be funded through intermediaries, as sub-grantees of international actors, including UN agencies, INGOs, or large NGOs.³¹ Quantitative data from the CBPFs in Afghanistan and Ukraine in 2022 showed national/sub-national organisations did not receive any funding for GBV programming directly. In DRC, 27% of the total CBPF GBV allocation (US\$1.28 million out of US\$4.82 million) in 2022 went to national/sub-national organisations directly, although no specific data exists for WROs/WLOs (see Figure 4, page 23).

The majority of the organisations in this study expressed frustrations regarding how they are perceived and treated by a variety of international actors who act as intermediaries between them and donors. Funding distributions through international intermediaries to national and sub-national sub-grantees often felt unfair and exploitative. Respondents experienced intermediaries allocating shared budgets to meet their own operational and sustainability costs, while limiting funds for WROs/WLOs to project implementation and basic administrative costs associated with the project. Project- and activity-focused funding serves the immediate goals of a humanitarian country strategy, but does not invest in the long-term sustainability and strategy of WROs/WLOs.

"We are obliged to accept sub-contracted partnerships just to survive and these partnerships are unjust because most funds go to the INGO for their own operation costs." – **WRO/WLO**

"Localisation means locally registered organisations should be able to access funds but we were told to apply with an INGO." – **WRO/WLO**

These types of partnerships – with WROs/WLOs funded as “implementing partners” – often leave little space for WROs/WLOs to influence strategic aspects of the projects. Respondents noted that organisations able to access other sources of funding for their on-going GBV work are able to reject such proposals from donors/intermediaries, whereas those who do not have other sources of funding have no choice but to accept proposals that sometimes require them to compromise on their own strategies.

“When we implement our donor’s program, we feel that we did not have enough of authority to actually do what women need in the field, because we are obliged to do only what is written in our partnership.” – WRO/WLO

“Relationship with international organisations is top-down – ‘you will do this’. We don’t get funded to ensure our staff safety whereas international organisations spend on their own staffs’ safety. [They] never asks us how we keep our staff safe from [GBV] offenders, which we face as part of our work.” – WRO/WLO

Respondents also spoke of a trust deficit with international humanitarian actors, who tended to assume there is a high level of risk to engaging in funding partnerships with national and sub-national organisations. This was exemplified by various examples of demands for additional audits, as an assurance that WROs/WLOs can be trusted with the funds, even when organisations had existing audits previously submitted to their own governments/authorities. This required WROs/WLOs to spend substantial additional funds from their core budgets to obtain new audits.

“So it’s not simply about an audit, the audit has to be done by a UN certified agency, which is also going to be expensive, which will also only speak in English and only read documents in English. So these are many barriers (to national/sub-national organisations obtaining audits).” – WRO/WLO

Consultation and coordination structures

Across the three contexts included in this report, WROs/WLOs reported dissatisfaction that they continued to be excluded from strategic leadership and decisions over funding priorities, despite international actors recognising their unique expertise in GBV prevention and response. Responses from international actors confirmed the perspective that WROs/WLOs are best suited to address GBV because of their proximity to affected communities, knowledge of the situation, ability to mobilise, and ability to strategically advocate with national and sub-national leaders and authorities.

“We attended [OCHA/cluster] sessions a couple of times, and our role was mostly passive. We were involved in groups and we got to know the donors and such sessions are usually meant for communication for networking.” – WRO/WLO

Examples were shared of WRO/WLO inclusion in various consultations held for needs assessment and validation of Humanitarian Response Plans (HRPs). However, WRO/WLO respondents distinguished between these types of consultative processes and opportunities for leadership. Respondents across the three contexts provided many examples of how this consultative approach is prevalent across a range of humanitarian fora, such as clusters and GBV sub-clusters, gender advisory groups, and other humanitarian working groups. Many expressed frustration that there is no feedback from international partners as to whether their inputs are taken forward to inform the strategic and funding decisions of international humanitarian actors. This points to a lack of transparency around decision-making and accountability from international actors to WROs/WLOs, which in turn disincentivises active participation from WROs/WLOs.

"Our role in the advisory group is to provide advice, we have no role in decision-making of OCHA/CBPF. We are never informed about what decisions are ultimately made, who, and what is funded." – **WRO/WLO**

"In the last meeting I attended on the GBV SC, there were 4 INGOs and only 2 NGOs present." – **International actor**

The reliance on WROs/WLOs for advice, while excluding them from greater leadership and strategic decision-making, points to a historic marginalisation of WROs/WLOs that has not yet been reformed, despite much rhetoric on the importance of WROs/WLOs. A feminist approach requires international actors to reject extractive approaches to funding and partnerships with WROs/WLOs, by creating space for WROs/WLOs to hold leadership roles and play a direct role in strategic decision-making across humanitarian fora. This means accelerating progress towards increased transparency and power sharing by building on feminist reforms to humanitarian partnerships and funding.

Opportunities for strategic engagement with WROs/WLOs

While the vast majority of humanitarian decision-making bodies are not currently inclusive enough for WROs/WLOs to assume a leadership role, respondents shared several opportunities for advancing feminist partnerships and overcoming persistent barriers to change.

Increased representation and leadership of WROs/WLOs within GBV Sub-Clusters

The majority of WROs/WLOs who participated in the research are members (but not leaders) of the GBV Sub-Cluster at national and/or sub-national levels. However, key informants mentioned that representation of WROs/WLOs in these fora is considerably weaker at the national level and the leadership opportunities for WROs/WLOs are low.

"National/sub-national organisations are better represented at sub-national Sub-Cluster levels than national levels. Many good organisations working on GBV are not members of the Sub-Cluster, either because they don't know about it or because they are too small. The GBV Sub-Cluster is also relatively new in Ukraine, many WROs/WLOs do not know about it. It is a painful process for Ukrainian organisations to be a part of clusters – it's more work and it's not clear what the benefit is to them." – **International actor**

In terms of CBPF specifically, representation in GBV Sub-Clusters is important because they play a strategic role both in setting the priorities for CBPFs and in the ability of an organisation to access pooled funding. They hold and share information about calls for proposals, identify priority locations and services, screen applications, make shortlists, and work with shortlisted applicants to help strengthen their applications. Active and meaningful participation in the GBV Sub-Cluster is therefore an asset for organisations engaged in GBV programming to successfully apply for CBPF funding. Yet this is not available to all types of organisations equally.

Both international actors and WROs/WLOs stated a need for GBV Sub-Clusters to make greater efforts to include WROs/WLOs and ensure they reflect the diversity of organisations addressing GBV with communities. The impact of this lack of inclusion and visibility in humanitarian coordination structures can be far reaching. It can impact how national and sub-national authorities view the value and authority of WROs/WLOs.

"When the Gender Ministry officials go to the field, they see many local organisations are doing good work on GBV but don't see them in most GBV Sub-Cluster meetings. The GBV Sub-Cluster has neither reached out to expand membership of GBV Sub-Cluster to locally based women-led organisations and neither have they advocated for greater representation of women-led organisations in the Sub-Cluster or advocated for greater funds for accessibility for locally led WROs/WLOs." – **International actor**

Contextualising the GBV Minimum Standards:

The IRC is leading an initiative on the Inter-Agency Minimum Standards for GBV in Emergencies Programming (GBV Minimum Standards) to increase the inclusiveness of GBV- focused organisations at national and sub-national levels, including WROs/WLOs. Funded by USAID's Bureau for Humanitarian Assistance, the initiative aims to increase the contextualisation and use of the GBV Minimum Standards, to address gaps in the quality and reach of GBV specialised programming, in collaboration with the GBV AoR's rollout of the GBV Minimum Standards. WROs/WLOs from across Asia and the Pacific, East and Southern Africa, and Latin America and the Caribbean have provided feedback of their experience of the rollout process of the GBV Minimum Standards; feedback included challenges and barriers faced, including the lack of strategic engagement with locally-led response. The initiative endeavours to work with the GBV community at the national, regional, and global levels to disseminate GBV best practice in preferred languages [of national and sub-national actors], accompanied by a diversity of facilitated and self-guided materials to improve the quality of GBV programming.

Many respondents across contexts pointed to the need for translations of materials relevant to the work and activities of the GBV Sub-Clusters – such as the GBV Minimum Standards – in order to better engage with WROs/WLOs.

"You need to have materials in the local languages and contextualised materials; you need to have much more [international humanitarian actors] with language skills and technical skills that can do trainings [for local organisations]. Only recently are there regional coordinators for the GBV Sub-Cluster at sub-national levels, who have local language skills, and this can improve communications with local organisations." – **International actor**

The GBV Sub-Cluster, which leads decision-making on GBV programming, is well-placed to actively foster the leadership of national and sub-national WROs/WLOs. Over recent years there have been a number of initiatives to drive greater inclusion of WROs/WLOs in coordination structures and decision making (see Box below). However, these need to be systematically implemented and resourced to ensure a permanent shift of power towards national and sub-national WROs/WLOs in line with feminist humanitarian principles. This increased leadership on the part of WROs/WLOs is vital if the humanitarian system is to foster sustainable feminist civil society that is recognised by national governments and international actors as decision makers within the humanitarian system.

WRO/WLO leadership within the GBV AoR:

At the global level, two WLO representatives from Nigeria and South Sudan have joined the GBV Area of Responsibility governance group. At the country level, there are a growing number of examples showing the positive impacts of elevating WROs/WLOs to leadership and decision-making roles. For example, having a WRO/WLO lead the national GBV Sub-Cluster (Yemen – Yemeni Women's Union); elevating WRO/WLO's access to CBPFs and CBPF leadership (Nigeria), capacity sharing initiatives in which the GBV Sub-Clusters create additional time (e.g. via office hours) and space to work with WROs/WLOs, such as assisting with applications or proposal writing (Sudan & South Sudan); having a majority of national GBV Sub-Cluster membership as national/sub-national, resulting in WROs/WLOs taking on stronger advocacy roles (Honduras & South Sudan).

Strategic engagement with existing locally-led initiatives

Female-led civil society is present before, during, and after international agencies engage in a crisis. WROs/WLOs have always organised networks at national and sub-national levels, to share information and develop collective plans, including in crisis situations.³² Respondents cited different examples of how international humanitarian actors are missing key opportunities to strategically engage with existing platforms and processes led by WROs/WLOs and therefore benefit from their expertise and leadership.

In Ukraine, for example, organisations shared how the Ukrainian Women's Fund (UWF)³³ coordinates between different WROs/WLOs, including smaller organisations, to bolster enhanced cooperation, facilitate information sharing, and drive increased visibility. However, when the UWF organised a consultation with international actors, the representation and engagement from international actors was very low.

"At the meeting some representatives from INGOs were there, not so many but they were there. But there was no one from the UN organisations, especially who control the clusters. So it's like, we are ready and we are already doing our steps, making our way towards [international actors] but they do almost nothing." – WRO/WLO

This example elucidates the potential for international agencies and organisations to better support and engage with locally-led humanitarian coordination structures and networks. Operationalising a feminist humanitarian approach means avoiding the creation of separate and parallel international structures that are unable to fully integrate the leadership and insights of WROs/WLOs.

WROs/WLOs interviewed acknowledged the comparative advantages of INGOs and UN agencies, including extensive experience in different humanitarian crises, familiarity with humanitarian aid architecture, the size of their funds and human resources which enable greater outreach and coverage, and the technical expertise and access to locations that many national and sub-national organisations may not have. Yet, WROs/WLOs in this study felt that that this sentiment is not reciprocated by international actors and that international actors often did not sufficiently recognise that there can be complementarity to working with existing networks of WROs/WLOs as strategic counterparts.

Feminist funding models

Experiences of good practice

WROs/WLOs included in this report cited many examples of positive funding partnerships and practices with international organisations that can be built on and replicated.

"[One INGO] required only a 3-page concept note and a 1-page budget and simple proposal. They give simple feedback and comments, and the fund is between US\$50,000 to US\$100,000. They also work with us to develop the proposal."

– WRO/WLO

"[One INGO] is very supportive, understanding, they have lots of staff on the ground who live in [the country], even if they are international staff, they do an amazing job of collecting information, assessing needs collectively with us and communicating with us constantly. They help with capacity gaps. Their team is women-led, including local women. Their procurement policies are easy and flexible so we can procure faster. They accepted our existing policies in place of their strict ones." – WRO/WLO

WROs/WLOs appreciated international actors which:

- Facilitate systems whereby WROs/WLOs design or co-design their own projects, collectively identify funding opportunities, and collectively apply;
- Place an emphasis on listening and working with WROs/WLOs throughout the project cycle, including offering support and being open to modifications as necessary, not just concerned with periodic financial and narrative reports;
- Show a willingness to fund small projects, give small grants, and have easier application processes;
- Understand the organisation's mission and values and are satisfied with the existing procedures and policies, not imposing their own;
- Show high-level commitment to including WROs/WLOs in their partner portfolio;
- Have strong female and national and sub-national leadership within their organisations.

Feminist funding landscape

There is a growing body of best practice for channeling quality funding to WROs/WLOs. The What Works to Prevent Violence against Women and Girls Programme³⁴ has modelled and championed positive practices at each stage of grantmaking, from the call for proposals and application, due diligence, and review of applications, through to programme and grant management and project closing.³⁵ A number of feminist funders and organisations – such as Mama Cash and AWID – have also outlined good practices for multilateral and bilateral donors around political commitment, eligibility criteria, programme design, funding mechanisms, and governance and management.³⁶

Feminist funds are in a good position to fund WROs/WLOs responding to GBV in emergencies and that specifically reach out to traditionally marginalised groups. Yet despite growing commitments by donor governments to support gender equality, the funding to specialised actors remains marginal. A recent study by the International Center for Research on Women (ICRW) analysed development finance data across seven countries that have committed to a feminist foreign policy and found that only 2% of their overall gender-focused aid went to women's equality organisations and institutions.³⁷ In order to accelerate progress towards localisation targets for GBV funding and fulfil their feminist ambitions to fund WROs/WLOs, donors need to diversify their funding allocations across a range of different types of pooled funding mechanisms to include explicitly feminist funds.

The Women Peace and Humanitarian Fund (WPHF)

Funded through a combination of government donors and private philanthropy, the WPHF was established in 2016 to provide flexible programmatic and institutional financing to national and sub-national women's organisations. Grants range from US\$2,500 – US\$200,000 (US\$350,000 in Ukraine) for a maximum of 24 months; in 2022, almost half of WPHF's grantees were first-time recipients of UN funding. The WPHF champions specific practices to increase its accessibility, including having only one criterion for eligibility (that an organisation is legally registered), simplifying the application process, conducting outreach to WROs/WLOs, and investing in peer learning and training to CSOs. In terms of leadership and decision-making of WROs/WLOs, women-led civil society always form part of the Fund's Global Board and National Steering Committees. Additionally, the fund undertakes a yearly review of its application process to ensure its structures continuously learn and align better with the organisations it serves. The fund has allocated the following total sums to WROs/WLOs in the contexts covered by this report: US\$5m in Afghanistan; US\$4.3 million in DRC; US\$4.4m in Ukraine.



IRC staff dances with members of the community-based organization Tupendane. *Olivia Acland/ IRC*

Section 3: Where is the money? An Analysis of CBPFs for GBV

Tracking CBPF funding to national and sub-national organisations for GBV projects is an important step in attempting to understand funding levels to WROs/WLOs. Quantitative analysis tracking CBPF allocations for GBV projects in Afghanistan, DRC, and Ukraine presented in this section confirm that there remain pervasive barriers to accessing CBPFs for national and sub-national organisations. Analysis below is not able to capture the percentage of funding going to WROs/WLOs, as it is not possible to disaggregate by WRO/WLO in publicly available data³⁸. The forthcoming One Grant Management System (GMS) will enable grantees to self-identify as WROs/WLOs, a welcome development to be monitored in the years to come. In the section below, the terminology “national/sub-national organisation” is maintained, as throughout the report.³⁹

Funding trends across contexts

1. From 2017-2022, the average GBV allocations of CBPFs failed to meet their 25% localisation targets in two of the contexts surveyed: 24% in Afghanistan and 17% in DRC (In Ukraine, this average is not available, as CBPF allocations for GBV only began in 2022).
2. The proportion of CBPF GBV allocations to national/sub-national actors has increased in DRC from 2017-2022, but it has decreased in Afghanistan over the same period. DRC is the only context surveyed that has met the 25% localisation target for CBPF GBV allocations in 2022.
3. Further analysis shows that additional funds are sub-granted to national/sub-national organisations (by both international NGOs and UN agencies), but the proportion of these funds remains small and taking them into account does not reach localisation targets for CBPF for GBV in Afghanistan and Ukraine in 2022.



Olga registers for a cash transfer program at a site on the outskirts of Mykolaiv. *Diana Zeyneb Alhindawi/IRC*

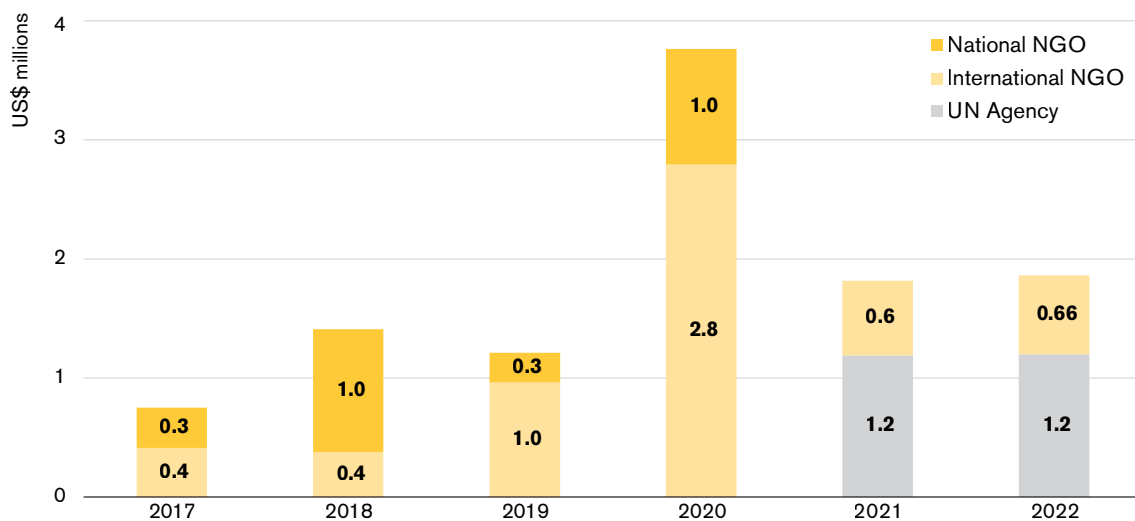
Afghanistan

Afghanistan faces a humanitarian crisis fuelled by conflict, recurrent natural disaster, and an economic collapse, which has left 28 million Afghans—more than half of the population— in need of humanitarian aid⁴⁰. Female-led households are disproportionately affected; 99% have insufficient food consumption. These factors are driving increasingly severe protection risks and negative coping mechanisms such as child marriage, forced marriage, child labour, and more, with women more likely than men to resort to such coping mechanisms. As of August 2021, many CSOs led by women had reportedly stopped working and some heads of organisations and civil society members had left the country. 77% of WROs/WLOs interviewed for a study by Gender in Humanitarian Aid (GiHA) Afghanistan reported they had no projects in 2022. Qualitative data for this report was gathered before the ban on women working in NGOs/INGOs that took place on December 24th 2022, and quantitative data goes through 2022.⁴¹

Afghanistan CBPF trends in GBV allocations

- The breakdown of allocations of pooled funding for GBV projects during 2017-2022 was, on average: national/sub-national NGOs, 24%; UN Agencies, 22%; INGOs, 54%. This is compared to around 17% of allocations to national/sub-national actors out of total fund allocations for all sectors/projects in Afghanistan during the same period. It is important to note, that there have been fluctuations in the volume and proportion of CBPF GBV allocations across 2017-2022, with the GBV allocations to national and sub-national organisations surpassing the 25% target in 2017, 2018, and 2020.⁴²
- The last allocations from the pooled fund to national/sub-national organisations responding to GBV in Afghanistan were made in 2020 (US\$1.0 million), and there have been no direct allocations since (Figure 1). Only 6% of overall GBV pooled funding in Afghanistan ultimately reached national/sub-national organisations in 2022, and the vast majority of the GBV pooled funding in Afghanistan went to INGOs and UN agencies (94% in 2022) (Figure 2). Yet, when analysing the changes in the overall amount and allocation of GBV funding it has to be taken into account that the changing political situation since August 2021 has considerably altered the space for GBV programming in Afghanistan.
- Since 2021 the overall volume of the AHF has increased from US\$74 million to US\$ 276 million. Alongside this increase the number of national/sub-national organisations funded by this pooled fund directly rose to 44 in 2022, which is the highest number since its inception.

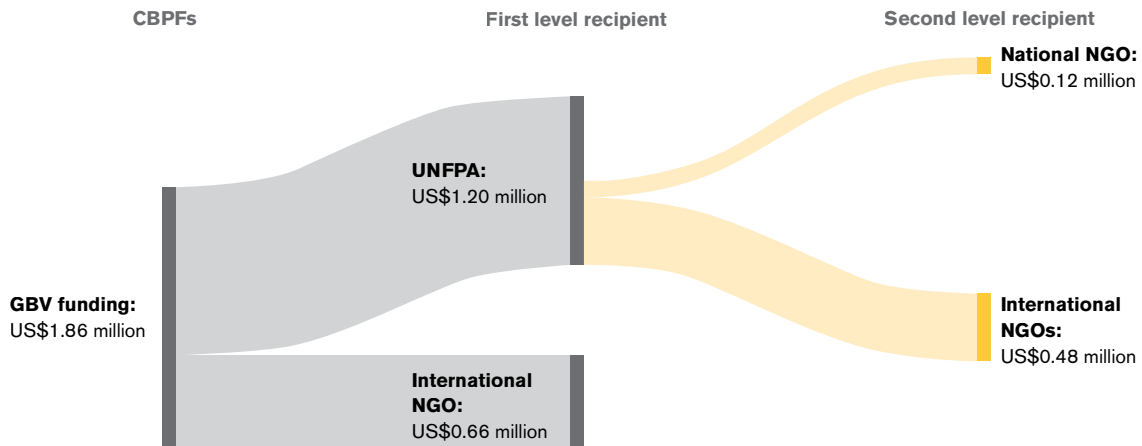
Figure 1: Afghanistan CBPF - Trends in GBV allocations by first recipient organisation type, 2017-2022⁴³



Source: Development Initiatives based on UN Office for the Coordination of Humanitarian Affairs (OCHA) country-based pooled funds (CBPFs) data hub.

Notes: 'National NGO' category includes both national and sub-national NGOs. GBV projects coded using a keyword search methodology.

Figure 2: Afghanistan CBPF - Allocations to Protection - GBV, 2022



Source: Development Initiatives based on UN Office for the Coordination of Humanitarian Affairs (OCHA) country-based pooled funds (CBPFs) data hub.

Notes: 'National NGO' category includes both national and sub-national NGOs. GBV projects coded using a keyword search methodology. 2022 data was last updated February 2023. Sub-granted amounts are shown in yellow.

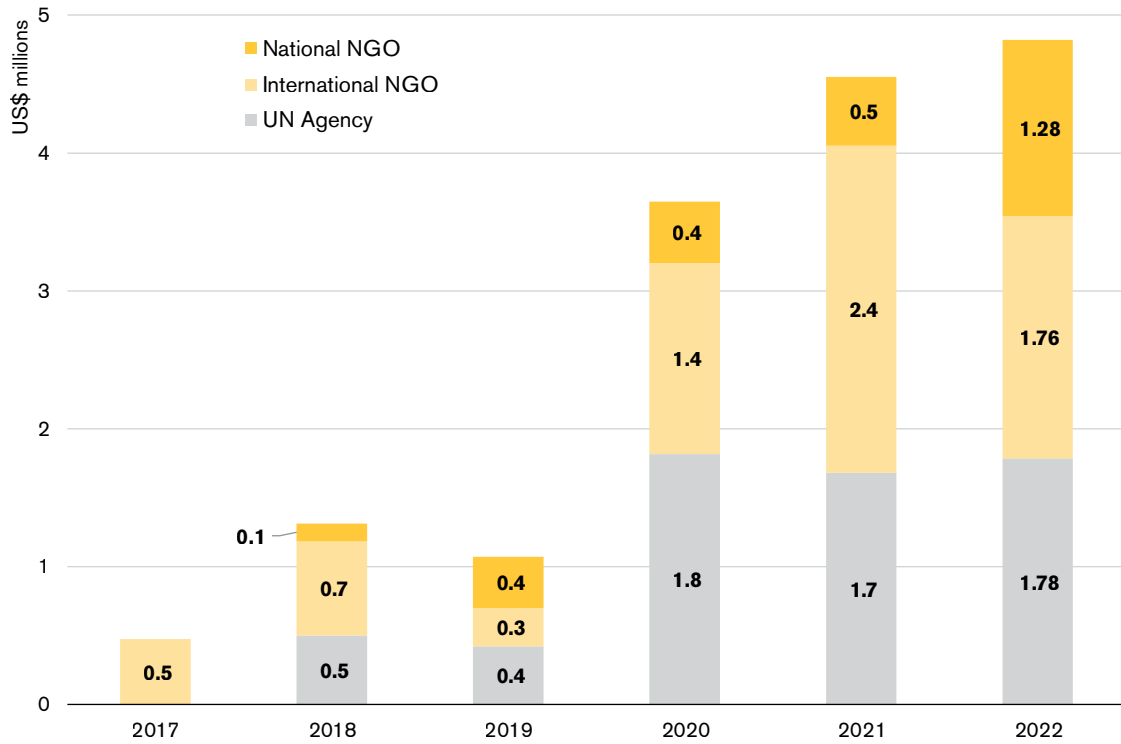
Democratic Republic of the Congo (DRC)

DRC is experiencing one of the world's longest running and most complex humanitarian crises. The escalating conflict in the east of the country, economic challenges, human rights violations, and disease outbreaks drive displacement and food insecurity and deepen the country's protracted crisis. The most recent escalation of violence is fueling displacement, disrupting humanitarian assistance, and driving up risk factors for GBV.⁴⁴ DRC has a strong history of women-led civil society that should be drawn on throughout crises.⁴⁵

DRC CBPF trends in GBV allocations:

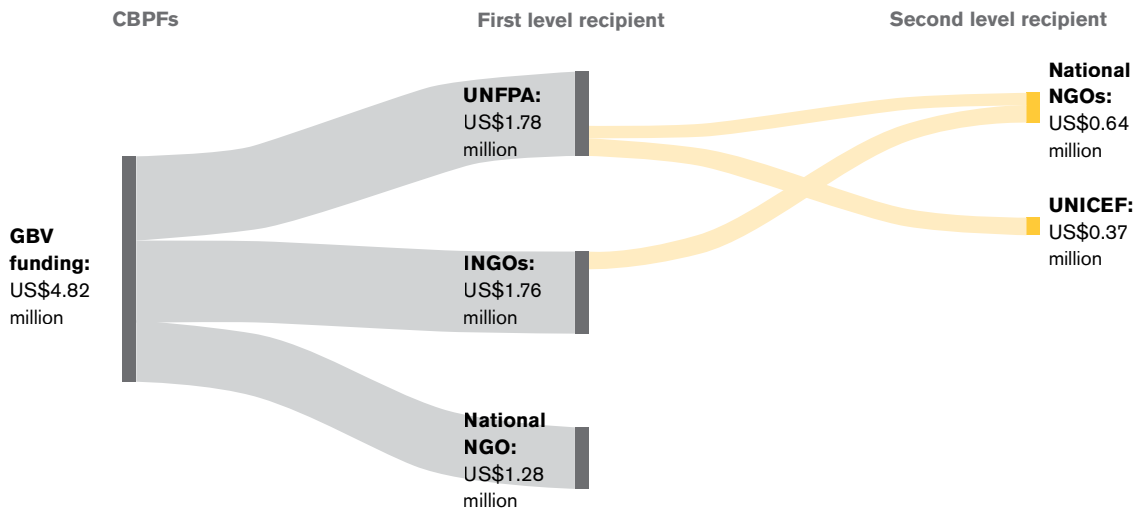
- Noting fluctuations from 2017-2022, the breakdown of allocations of pooled funding for GBV projects during 2017-2022 was, on average: national/sub-national NGOs, 17%; UN Agencies, 39%; and INGOs, 44%. In contrast, 33% of the DRC CBPF funding was channelled directly to national/sub-national NGOs across all sectors during the period. The 25% localisation target within CBPF GBV allocations was met in 2019 but was not met in 2020 and 2021 when there was a spike in the overall allocation to GBV.
- Pooled funding for GBV projects channelled directly to national/sub-national organisations is increasing in DRC (Figure 3), and this is in the context of the overall fund allocations decreasing in recent years. In 2022, total allocations to the DRC pooled fund reduced by over a third (down 42%), from US\$65.1 million in 2021 to US\$37.7 million in 2022. However, funding to GBV increased year-on-year, from US\$3.6 million in 2020, to US\$4.6 million in 2021, and US\$4.8 million in 2022, suggesting an increase in the prioritisation of GBV within the DRC CBPF.
- In 2022, 40% of overall GBV pooled funding in DRC ultimately reached national/sub-national organisations in 2022 (with 26.5% channelled directly). (Figure 4)

Figure 3: DRC CBPF - Trends in GBV allocations by first recipient organisation type, 2017-2022



Source: Development Initiatives based on UN Office for the Coordination of Humanitarian Affairs (OCHA) country-based pooled funds (CBPFs) data hub.
 Notes: 'National NGO' category includes both national and sub-national NGOs. GBV projects coded using a keyword search methodology.

Figure 4: DRC CBPF - Allocations to Protection - GBV, 2022



Source: Development Initiatives based on UN Office for the Coordination of Humanitarian Affairs (OCHA) country-based pooled funds (CBPFs) data hub. Notes: 'National NGO' category includes both national and sub-national NGOs. GBV projects coded using a keyword search methodology. 2022 data was last updated February 2023. Sub-granted amounts are shown in yellow.

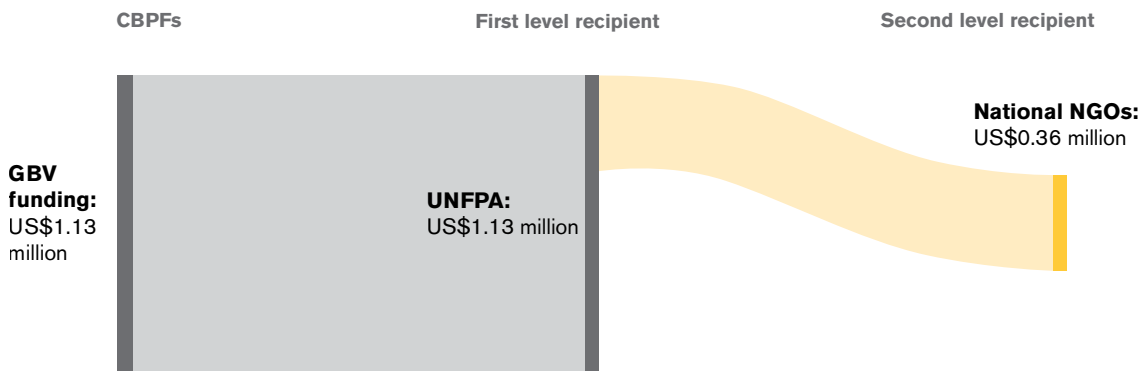
Ukraine

The war in Ukraine has sparked the world's "fastest, largest"⁴⁶ displacement crisis in decades, with 7.9 million refugees across Europe.⁴⁷ Women and children make up 86% of Ukrainian refugees, and women and girls represent 65% of the internally displaced people in Ukraine.⁴⁸ Women and girls face an array of GBV, both inside and outside of their country; women in Ukraine reported marked increases in intimate partner violence and challenges to meet basic needs, such as food and shelter.⁴⁹

Ukraine CBPF trends in GBV allocations:

- Since the inception of the CBPF in Ukraine in 2019, there were no Protection/GBV projects identified for the first three years (2019–2021) based on publicly available OCHA datasets.⁵⁰
- Total allocations of the fund increased to over US\$190 million in 2022, but only one GBV project has been identified (to UNFPA), amounting to US\$1.13 million (0.6% of total CBPF allocations in 2022).
- This in contrast to the overall CBPF in Ukraine, where in 2022, 18 national/sub-national organisations received allocations from the Ukraine CBPF directly, but no national/sub-national organisations received direct allocations for GBV projects. Instead, two organisations were sub-granted by UNFPA (amounting to US\$0.36 million).
- The fund has overall, notably high allocations to national/sub-national organisations: 39% of overall allocations went to national/sub-national organisations in 2021, with a decrease to 23% to national/sub-national NGOs in 2022, pointing to challenges in getting CBPF allocations for GBV to national/sub-national NGOs.
- Out of total allocations for GBV projects of US\$1.13 million in 2022, 68% was channelled directly to one UN agency (UNFPA, US\$0.77 million). The remaining third (32%) was sub-granted by UNFPA to two national NGOs (Figure 5).⁵¹

Figure 5: Ukraine CBPF - Allocations to Protection - GBV, 2022⁵²



Source: Development Initiatives based on UN Office for the Coordination of Humanitarian Affairs (OCHA) country-based pooled funds (CBPFs) data hub.

Notes: 'National NGO' category includes both national and sub-national NGOs. GBV projects coded using a keyword search methodology. 2022 data was last updated February 2023. Sub-granted amounts are shown in yellow.

Conclusion

The evidence and analysis in this report demonstrates that WROs/WLOs continue to be marginalised in sector-wide efforts to increase funding to national and sub-national humanitarian organisations, despite wider progress being made on localising humanitarian funding. WROs/WLOs find themselves at a double-disadvantage when it comes to accessing funding, both as national or sub-national organisations competing with international actors for funds, and additionally as organisations being run by or focusing on women within wider patriarchal systems.

CBPFs have been designed to advance localised funding, which is now defined as a secondary aim of the Funds in the new CBPF Global Guidelines. Yet, it has not been designed in a way that addresses historical disadvantages and exclusion of WROs/WLOs. That CBPFs are increasing the representation of national and sub-national actors and meeting their Grand Bargain commitment globally to channel 25% of funding through local and national organisations is positive, but a deep dive shows that the percentage at national levels for GBV funding to these organisations is mixed. Progress seen in DRC and highlighted in this report is welcome and should be built on with wider reforms across contexts.

While CBPFs are a vital part of the humanitarian funding landscape as the largest pooled funding mechanism, the findings in this report point to wider issues beyond the CBPF regarding the lack of leadership opportunities for WROs/WLOs and unequal partnerships between international actors and WROs/WLOs. Change must be resourced through wider reform of the funding landscape in humanitarian settings. Global and national feminist funds are already in a good position to reach feminist organisations responding to emergencies in their countries and communities, yet they remain dramatically underfunded.

Humanitarian reform efforts must continue to better understand and overcome the systemic, intersecting, and structural barriers rooted in gender inequalities that are stalling the localisation of GBV prevention and response work and inhibiting increased funding to WROs/WLOs. WROs/WLOs in this report shared a range of practical recommendations for expanding access to pooled funds, using CBPFs as an example, related to funding criteria and creating more equitable partnerships. However, in the current system, the goals of localisation and risk-mitigation are seemingly at odds, stalling wider reform. In such situations, OCHA as well as donor governments with influence over the strategic decision-making on CBPFs must give additional weight to the leadership of WROs/WLOs and seek innovative solutions.

The lived experiences of WROs/WLOs highlighted within the report signal a need for donors and international humanitarian agencies to adopt a feminist lens to humanitarian reform that can unlock funding and partnerships for WROs/WLOs and create space for them to take on leadership and strategic decision-making. A feminist approach moves beyond a limited agenda for localisation that instrumentalises the expertise and reach of national and sub-national organisations for programme delivery, to a transformative agenda that meets WROs/WLOs where they are and champions equitable partnership models. This requires that international agencies go beyond rhetorical adherence to reciprocity and capacity-sharing to implement co-leadership, co-visibility, and co-decision making through partnership frameworks and funding models.

Given the centrality of WROs/WLOs in achieving gender equality, the international humanitarian system must invest in WROs/WLOs if we are to end GBV globally. The rollout of the new CBPF Global Guidelines offer a valuable opportunity to promote the active inclusion of female-led civil society and create space for their leadership. As humanitarian need continues to grow, improved partnerships with WROs/WLOs and their equal participation have to be our priority.

Annex: Methodology and limitations

This report is based on qualitative data collected through key informant interviews (KIIs) and group consultations and on analysis of publicly available quantitative data on CBPFs.

Qualitative analysis

Selection of country contexts

The selection of countries included within this report—Afghanistan, the Democratic Republic of the Congo, and Ukraine—was based on a few factors, including: presence of pooled funds, including CBPFs (for which data is publicly available) and Women Peace and Humanitarian Funds; ability of IRC staff within the county to provide support with outreach to WROs/WLOs; and advocacy potential regarding prioritisation and funding to WROs/WLOs.

The selection of WROs/WLOs addressing GBV was subsequently completed in close collaboration with IRC Women's Protection and Empowerment (WPE) staff in each country, based on factors including existing or past partnership with the IRC and existing relationship through other fora. The only criteria needed to participate was that the organisation be a WRO or WLO working to end GBV. In total, 12 organisations were identified for outreach. Having received funding from a pooled fund was not a criterion for inclusion, as this research wanted to capture the perspectives of organisations who may have been unsuccessful in acquiring pooled funds.

Key informant interviews and group consultations

Qualitative data was collected through KIIs, conducted virtually (using Zoom) across Afghanistan, DRC, and Ukraine. KIIs were conducted with national and sub-national civil society organisations, IRC staff working on WPE Programmes, and representatives of relevant international humanitarian agencies, including the GBV Sub-Cluster and OCHA⁵³ in the three countries. Interpretation in French, Ukrainian, Dari, and Pashto was offered to interviewees. In total, interviews were conducted with nine national and sub-national organisations (four in Afghanistan; three in Ukraine; and two in DRC) and nine key humanitarian stakeholders working for IRC, UNFPA, and OCHA across the three countries. Among the organisations that participated in a KII, the majority identified as either a WLO or WRO. The large majority of organisations included in the study had a national reach to their work, with only one of the nine organisations having only a provincial reach.

Three small group consultations were held with the same national and sub-national organisations following completion of the KIIs. These consultations had a twofold purpose: to share preliminary data with participating organisations regarding the findings, and to ask them for their recommendations in light of the findings across countries. In total, 11 organisations participated in consultations (four in Afghanistan; three in Ukraine; and four in DRC). The additional organisations based in DRC that participated in consultations had been unable to participate in KIIs due to scheduling issues. Interpretation in French, Ukrainian, Dari, and Pashto was used.

Finally, a validation session with interpretation in relevant languages was held in early February 2023 with organisations who participated in the research, a small group of global feminist funders and women's rights activists, and a small group of IRC colleagues. Organisations who were not able to attend were offered the possibility to send written feedback on key findings and recommendations.

Quantitative analysis

The analysis of the amounts of humanitarian pooled funding to WROs/WLOs working on GBV response in the three country contexts covered in this report is based on publicly available data extracted from the OCHA CBPF Data Explorer.⁵⁴ Data was last updated on 02/02/2023 and was verified by analysts at DI. Data was downloaded for the six years covered (2017-2022). The analysis of each country's CBPFs' direct and indirect (sub-granted) funding used the funds' own classifications of recipient organisations, separated into three organisation types: UN Agency, International NGO, and National NGO.

In order to identify GBV projects, a keyword search methodology was employed, building on the methodology and approach used for the DI report "Funding for gender-relevant humanitarian response".⁵⁵ A list of keywords⁵⁶ was used to search the Project Code and Project Title of all qualifying projects (i.e., projects under the Protection Cluster) and flag those 'GBV relevant' projects for inclusion in the aggregate figures. The analysis only captured projects with a primary focus on GBV, as marked under the "Protection - GBV" cluster. It therefore excluded any projects where GBV activities only represented small components of projects (e.g. 2% or 10%) or GBV 'mainstreamed' projects. The results were manually checked to ensure they were correctly categorised.

Limitations of the study

Quantitative data available for the study only allowed identification of allocations towards stand-alone GBV projects, using a key word search methodology for projects reported under the Global Protection Cluster, including projects under the GBV Sub-Cluster and projects further identified through the keyword search. Therefore, CBPF allocations towards GBV as part of multi-sectoral projects (e.g. multipurpose cash projects) in all three countries could not be disaggregated. This approach resulted in limited eligible projects considered for analysis, in particular for the Afghanistan and Ukraine funds. Furthermore, because the analysis was limited to data available from UN OCHA CBPFs Data Explorer only, quantitative data available only allowed for identification of national and sub-national organisations, rather than WROs/WLOs, as these are not existing categories available for disaggregation. Further analysis of the organisations who had received CBPF allocations for GBV was not conducted due to the lack of desire to ascribe WRO/WLO status to organisations who had received funding, and outreach to these organisations to gauge whether they identified as a WRO/WLO was not possible due to financial and time constraints.

Qualitative data represents a small sample size of WROs/WLOs, indicating that this research should be seen as a snapshot and does not represent the perspectives of all WROs/WLOs. Not all organisations had engaged with CBPFs (e.g. as fund recipient or applicant); this limitation was overcome by including wider questions in the KIIIs regarding leadership and funding, beyond just CBPFs. Moreover, it was outside of the scope of this study to conduct wider contextual analysis on the funding and representational landscape of WROs/WLOs in each country (e.g. what proportion of national and sub-national organisations in each context are WROs/WLOs? What is the typical size and budgets of WROs/WLOs within each context?) or the experiences of intermediaries. These are questions which should be further explored in studies.



A group of adolescent girls and boys work to educate their community and their peers about the importance of sexual and reproductive health. *Kellie Ryan/ IRC.*

Endnotes

1. See, for example, the What Works to Prevent Violence against Women and Girls Programme: <https://ww2preventvawg.org/> & Mama Cash and AWID, 2020. Moving More Money to the Drivers of Change: How bilateral and multilateral funders can resource feminist movements. https://www.awid.org/sites/default/files/2022-02/MovingMoreMoney_FINALFINAL.pdf
2. See for example, the Global Action Plan resulting from the Generation Equality Forum; the Women, Peace and Security Humanitarian Action Compact.
3. The Grand Bargain (Official Website). <https://interagencystandingcommittee.org/grand-bargain>
4. OCHA. County-Based Pooled Funds 2021 In Review. https://www.unocha.org/sites/unocha/files/CBPF_2021_inReview_masterlayout_20220607.pdf
5. Ibid
6. OCHA. 2022. Country-Based Pooled Funds Global Guidance. <https://www.unocha.org/our-work/humanitarian-financing/country-based-pooled-funds-cbpf/cbpf-global-guidelines>
7. Mama Cash. 2020. Feminist activism works! A review of the select literature on the impact of feminist activism in achieving women's rights. https://www.mamacash.org/media/publications/feminist_activism_works_mama_cash.pdf
8. IASC. Grand Bargain 2.0 Caucuses. <https://interagencystandingcommittee.org/group/grand-bargain-20-caucuses>
9. IRC. Diversity, Equality, and Inclusion. <https://www.rescue.org/page/diversity-equality-and-inclusion>
10. Pledge for Change. <https://pledgeforchange2030.org/about-us/>
11. OCHA. 2022. Country-Based Pooled Funds Global Guidance. <https://www.unocha.org/our-work/humanitarian-financing/country-based-pooled-funds-cbpf/cbpf-global-guidelines>
12. Norwegian Refugee Council. 2022. Pooled Funds: The new humanitarian silver bullet? <https://www.nrc.no/resources/reports/pooled-funds-the-new-humanitarian-silver-bullet/>
13. IRC and VOICE, 2019. Where is the Money? How the Humanitarian System is Failing in its Commitments to End Violence against Women and Girls. <https://www.rescue.org/report/wheres-money-how-humanitarian-system-failing-fund-end-violence-against-women-and-girls>
14. IRC, 2020. What Happened? How the Humanitarian Response to COVID-19 Failed to Protect Women and Girls. <https://www.rescue.org/uk/report/what-happened-how-humanitarian-response-covid-19-failed-protect-women-and-girls>
15. IRC, 2021. Why Not Local? Gender-based Violence, Women's Rights Organisations, and the Missed Opportunity of COVID-19. <https://www.rescue.org/report/why-not-local-gender-based-violence-womens-rights-organisations-and-missed-opportunity-covid>
16. See Feminist Humanitarian Network, 2021. Women's Humanitarian Voices: Covid-19 through a feminist lens: A Global Report. & AWID. 2021. Where Is The Money for Feminist Organizing? <https://www.awid.org/news-and-analysis/new-brief-where-money-feminist-organizing>
17. The majority of organisations interviewed self-identified as either WRO or WLOs, and accordingly those terms will be used throughout the report. Additionally, the terms "national actor" and "sub-national actor" will be used in favour of "local actors", given the negative connotations that the term "local actor" has (see IRC. 2020. Opportunities for Transformative Language within Feminist Approaches to Partnership. https://gbvresponders.org/wp-content/uploads/2021/01/IRC-Language_Paper-ENG-screen.pdf).
18. OCHA. CBPF Eligibility Guidance Note Annex 7. <https://www.unocha.org/our-work/humanitarian-financing/country-based-pooled-funds-cbpf/cbpf-global-guidelines>
19. The five principles of the CBPF are inclusiveness, timeliness, flexibility, efficiency, and accountability and risk management.
20. OCHA. 2022. Country-Based Pooled Funds Global Guidance. <https://www.unocha.org/our-work/humanitarian-financing/country-based-pooled-funds-cbpf/cbpf-global-guidelines>
21. OCHA. County-Based Pooled Funds 2021 In Review. https://www.unocha.org/sites/unocha/files/CBPF_2021_inReview_masterlayout_20220607.pdf
22. DRC Humanitarian Fund 2021 Annual Report. <https://www.unocha.org/publication/country-based-pooled-funds/drc-humanitarian-fund-annual-report-2021>
23. OCHA. County-Based Pooled Funds 2021 In Review. https://www.unocha.org/sites/unocha/files/CBPF_2021_inReview_masterlayout_20220607.pdf

24. OCHA. CBPF Global Guidelines. <https://www.unocha.org/our-work/humanitarian-financing/country-based-pooled-funds-cbpf/cbpf-global-guidelines>
25. Ukrainian Women's Fund. Success Stories. <https://uwf.org.ua/en/Category/stories/>
26. In an effort to increase eligibility, the UHF team trained more than 50 WROs/WLOs on the Fund's allocation and partner eligibility processes in 2022.
27. Interviewees from Ukraine reported that the Women's Consortium of Ukraine provides small grants through a quick and easy application process to small WLOs/WROs, requiring only a 3-page proposal, which is usually approved within a few days.
28. OCHA. DRC Humanitarian Fund 2021 Annual Report. <https://www.unocha.org/publication/country-based-pool-funds/drc-humanitarian-fund-annual-report-2021>
29. According to one respondent, UN Women had funded an audit of their organisation so they can fulfil one of the eligibility criteria for CBPF; another organisation shared that the Afghan Coordinating Body for Afghan Relief and Development (ACBAR) FCDO-funded Twinning Programme is supporting capacity sharing and building between international actors and national actors. See ACBAR Humanitarian Twinning Program: <https://www.acbar.org/site-page/7?Humanitarian%20Twinning%20Program>
30. Another organisation shared that UN Women has announced a call for proposals exclusively for WLOs on Advancing Women's Rights and Gender Equality in Afghanistan.
31. Development Initiatives, 2022. Funding to local actors: evidence from the Syrian refugee response in Türkiye reports. <https://devinit.org/resources/funding-to-local-actors-syrian-refugee-response-turkiye/> & Development Initiatives, 2021. Funding for gender-relevant humanitarian response. <https://devinit.org/resources/funding-for-gender-relevant-humanitarian-response/>
32. Feminist Humanitarian Network. Women's Humanitarian Voices: Covid-19 through a feminist lens. <https://www.feministhumanitariannetwork.org/covid-report>
33. The Ukrainian Women's Fund's mission is to "Support women's/feminist organisations, make for their participation in the development of a powerful, effective and mass women's/feminist movement capable of protecting women's rights and promoting gender equality in all areas". <https://uwf.org.ua/en/>
34. What Works to Prevent Violence against Women and Girls Programme. <https://ww2preventvawg.org/>
35. What Works to Prevent Violence against Women and Girls Programme. 2022. Building effective funding structures for prevention of violence against women and girls: Aspirations and barriers among Women's Rights Organisations seeking bilateral and multilateral funding. <https://ww2preventvawg.org/sites/default/files/2022-10/Barriers%20V2.pdf>
36. Mama Cash and AWID. 2020. Moving More Money to the Drivers of Change: How bilateral and multilateral funders can resource feminist movements. https://www.awid.org/sites/default/files/2022-02/MovingMoreMoney_FINALFINAL.pdf
37. Papagiotti, F., Thompson, L. and Ahmed, S. 2022. Feminist Foreign Policy and Development Finance for Gender Equality: An Assessment of Commitments. Washington, DC. International Center for Research on Women. <https://www.icrw.org/publications/feminist-foreign-policy-and-development-finance-for-gender-equality/>
38. Development Initiatives, 2021. Funding for gender-relevant humanitarian response. <https://devinit.org/resources/funding-for-gender-relevant-humanitarian-response/>
39. In OCHA datasets, the coding "National NGOs" is used. This encompasses national and sub-national organisations, although there is no further disaggregation provided by OCHA in datasets for sub-national organisations or WROs/WLOs.
40. UN OCHA, January 2023. <https://www.unocha.org/afghanistan>
41. Since December, negotiations with line ministries have resulted in the resumption of NGO-led programming with female staff partially working in four sectors (health, education, emergency response and livelihoods). Humanitarian agencies have taken a clear position on the ban, pausing programmes while negotiations to allow women to work continue, and rapidly resuming programming when the roles and safety of female staff can be assured by the de-facto authorities. Humanitarians remain committed to further expanding operations to deliver assistance to the 28 million Afghans in need of humanitarian assistance, 75% of whom are women and girls.
42. According to UN OCHA, about 8 per cent of all partners in 2022 were WLO/WRO (nine organisations).
43. Please note that these figures are based on publicly available data on projects with the primary objective "Protection - GBV", which may lead to discrepancies to figures reported by OCHA.
44. DRC Protection Cluster. 2022. Note de Plaidoyer sur les Allégations de Violences Sexuelles et

- basées sur le Genre perpétrées par les hommes en uniforme. <https://www.globalprotectioncluster.org/publications/847/communication-materials/advocacy-note/drc-protection-cluster-note-de-plaidoyer-sur>
45. UN Women. 2020. Les ONG congolaises continuent de s'engager pour la protection des femmes et l'action humanitaire. [https://africa.unwomen.org/fr/news-and-events/stories/2020/11/congolese-ngos-continue-to-commit-to-the-protection-of-women-and-humanitarian-action#:~:text=La%20Fondation%20Femme%20Plus%20\(FFP,Femme%20\(ADDF\)%20au%20Nord%20Kivu](https://africa.unwomen.org/fr/news-and-events/stories/2020/11/congolese-ngos-continue-to-commit-to-the-protection-of-women-and-humanitarian-action#:~:text=La%20Fondation%20Femme%20Plus%20(FFP,Femme%20(ADDF)%20au%20Nord%20Kivu)
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 49. VOICE and HIAS. 2022. Waiting for the Sky to Close: The Unprecedented Crisis Facing Women and Girls Fleeing Ukraine – Ukraine Assessment Report. https://voiceamplified.org/wp-content/uploads/2022/09/UKRAINE_ASSESSMENT_REPORT.pdf
 50. To promote gender sensitivity in programming funded by the UHF, the GenCap Advisor formed a Gender Review Committee comprising of UN, INGO and NGO members of the GiHA WG at the review stage. This team used a guidance tool developed by the UHF in collaboration with the GenCap Advisor to support applications review. Projects with weak gender and age inclusion components were returned to partners for review and adjustment, with clear instructions on areas for improvement and access to necessary guidance resources. Gender technical experts ensured that the reviews were practical and constructive.
 51. In response to this lack of eligible project proposals in 2022, the Fund worked with the GenCap Advisor's network and Gender in Humanitarian Action (GiHA) Working Group (WG) to identify over 100 local and national WLOs/WROs and to encourage them to apply to become eligible partners.
 52. Please note that these figures are based on publicly available data on projects with the primary objective "Protection - GBV", which may lead to discrepancies to figures reported by OCHA.
 53. In the cases of DRC and Ukraine representatives from the CBPF were interviewed. This was not possible for Afghanistan, in which case a representative from the OCHA country office was interviewed.
 54. <https://cbpf.data.unocha.org/dataexplorer.html>
 55. Development Initiatives, 2021. Funding for gender-relevant humanitarian response. <https://devinit.org/resources/funding-for-gender-relevant-humanitarian-response/>
 56. The list included the following key terms: GBV, VBG, Gender-Based Violence, Violences sexuelles, Genre, Survivants, Abus.

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