



REPORT OF INTERACTION'S MISSION TO SOUTH SUDAN

APRIL 2023

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EXECUTIVE SUMMARY

More than a decade after gaining independence, South Sudan still faces significant humanitarian need, with an estimated 9.4 million people—75% of the population—expected to require humanitarian assistance in 2023. Although donor funding levels have remained stable, need continues to rise.

Despite the significant number of NGOs in South Sudan—including 1,800 local or national NGOs (NNGOs)—recent changes to the sectoral architecture in-country have jeopardized NGO¹ participation in humanitarian coordination mechanisms at a time when the international community is aiming to improve NGO engagement in the global system. As an advocate for the NGO community, a major convener of U.S.-based international NGOs (INGOs), and a supporter of field-level coordination via NGO fora operating in 31 countries, InterAction staff conducted a mission to Juba, South Sudan, in April 2023. The mission focused on humanitarian coordination, information flow (particularly of global initiatives into the South Sudan context), and partnership processes and policies.

InterAction’s mission revealed a number of critical issues, including:

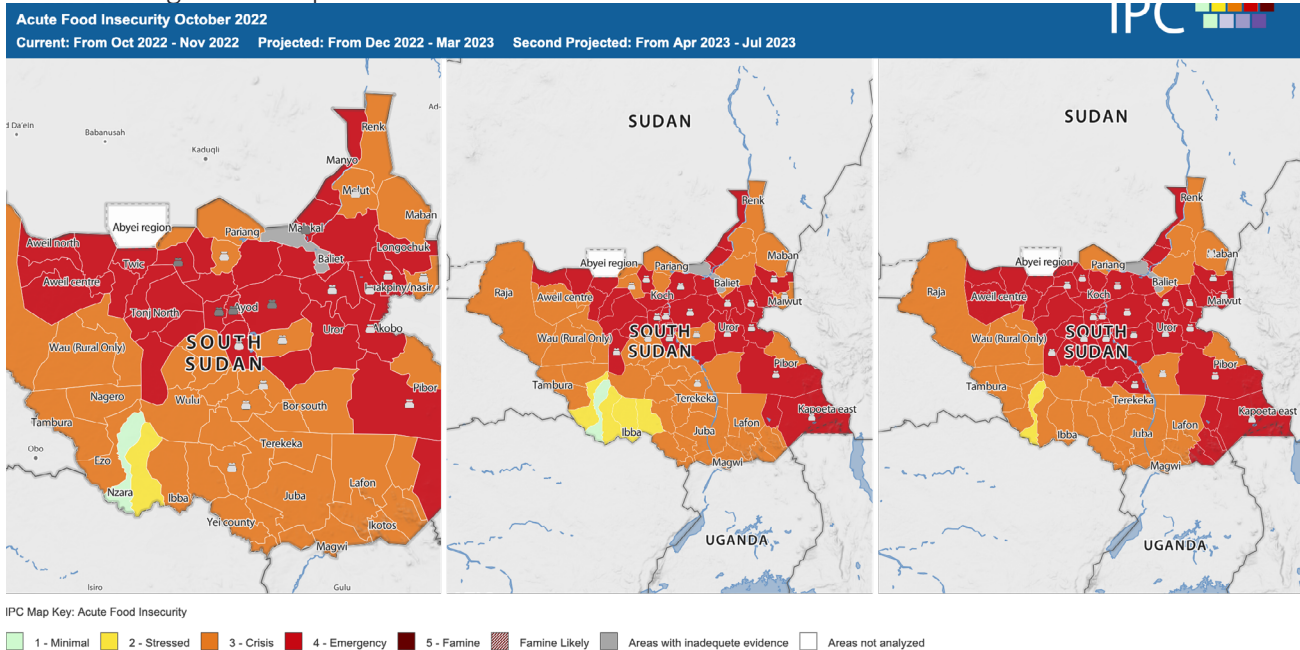
- ▶ **International and national NGOs overwhelmingly feel that the humanitarian coordination architecture is dominated by U.N. agencies and that they are not adequately informed, consulted, or included.**
- ▶ **Even where NGOs are included, they do not feel that their voices are listened to or their recommendations acted upon.**
- ▶ **Communication between humanitarian stakeholders in South Sudan is poor. Some stakeholders are uncertain of their role in information dissemination.**
- ▶ **U.N. agencies continue to receive the bulk of funding, which they pass through to NGOs who directly implement programs. However, each donor or intermediary imposes additional conditions to receive and administer or report on those funds. These conditions constrain NGOs’—particularly NNGOs’—ability to access funding and act as equitable partners.**
- ▶ **Sentiments regarding “capacity building” were fractured. Some stakeholders stated that NNGOs required additional capacity to receive funding directly. Some NNGOs felt they had sufficient capacity, while others asked for specific trainings to meet donor expectations.**

Many of the issues and themes of this report are intertwined due to power dynamics, capacity, participation, and the overall structure of humanitarian coordination within South Sudan. Additionally, although this report focuses on South Sudan, many of these findings are globally relevant and, as such, will inform InterAction’s continued global work.

¹ Throughout the report, “NGO(s)” refers to both INGOs and NNGOs. References to INGOs or NNGOs specifically will be written as such.

CONTEXT

Nearly 12 years after gaining independence, the humanitarian situation in South Sudan remains precarious. The United Nations (U.N.) estimates that 9.4 million people—75% of the population—will require humanitarian assistance in 2023, a nearly 400% increase over the 1.9 million people needing assistance in 2012. The situation is likely to become more dire as [100,000 refugees](#) have already crossed into South Sudan, fleeing violence in Sudan that began in mid-April².



Disclaimer: The information shown on this map does not imply that the IPC and CH officially recognizes or endorses physical and political boundaries.
 Source: Integrated Food Security Phase Classification

*South Sudan: Acute Food Insecurity Situation
 October - November 2022 and Projections for December 2022 - March 2023 and April - July 2023 (ICP)*

Food security has deteriorated precipitously, with [7.8 million people](#) projected to experience crisis-level food insecurity in 2023 under the Integrated Food Security Phase Classification (IPC). Protection needs have skyrocketed, with widespread impunity for gender-based violence (GBV) and sexual exploitation and abuse (SEA). Donor funding has been remarkably consistent in recent years—between \$1.4 billion and \$1.5 billion was secured from 2016 to 2022, according to the U.N. Office for the Coordination of Humanitarian Affairs’ (OCHA) [Financial Tracking Service](#). However, looking forward, there are widespread expectations that this level of funding will not continue due to overall decreased foreign assistance and oft-cited “donor fatigue.”

Somewhat conversely, South Sudan is at the locus of a variety of global conversations and policy processes: it is a priority country for implementation of the [Action Agenda on Internal Displacement](#); is one of four countries selected as part of the Emergency Relief Coordinator’s (ERC) “[Flagship Initiative](#)”; and is hosting a [Grand Bargain National Reference Group](#). It is clear that what happens in South Sudan will inform the global humanitarian architecture and coordination mechanisms.

Despite—or perhaps because of—the tremendous need, the number of humanitarian and development actors has proliferated. The Government of South Sudan (GoSS) Relief and Rehabilitation Commission told InterAction that it had registered approximately 150 INGOs and nearly 1,800 NNGOs, community-based organizations, and faith-based associations. There are also U.N. agencies and international financial institutions, such as the World Bank Group, operating in the country.

² The findings in this report were conducted the same week that the conflict renewed in Sudan. This report focuses on the longer-term context of the humanitarian response in South Sudan.

Although strong in number, the NGO community in South Sudan faces multiple concurrent challenges. Due to operational challenges (expanded upon below), the South Sudan NGO Forum (NGOF) recently went through a considerable downsizing that may, without additional and consistent funding, make it difficult for the Forum to balance operations as usual with increased policy demands. Consequently, there is a risk that the above processes, and the overall humanitarian architecture in South Sudan³, will take place without the robust participation of humanitarian NGOs—due to stagnating funding, rising needs, the number of organizations competing for funding, and increased policy demands—despite their critical role as direct implementers of humanitarian programming.

More than a decade after independence, with billions of dollars spent and the future more uncertain than ever for the people of South Sudan, many are asking what there is to show for these efforts. Humanitarians may have succeeded in keeping people alive but have also done harm and fostered dependencies. Inequitable power dynamics—including colonialism, racism, sexism, and other pernicious inequalities—are rampant in South Sudan, as they are endemic to the humanitarian system. The system is not providing people with the assistance they require as efficiently and effectively as possible. All stakeholders in the humanitarian sector have a role to play in urgently addressing these systemic issues, regardless of how long this might take.

This report addresses some of the key challenges facing humanitarian stakeholders in South Sudan and makes recommendations to further the development of culturally and contextually appropriate solutions that will empower people in South Sudan.

OBJECTIVES

Two InterAction staff members—Sarah Fuhrman, Director of Humanitarian Policy and Practice ad interim, and Stephanie Scholz, Program Manager for Humanitarian Policy—traveled to Juba, South Sudan, from April 17 to 25. As noted above, the mission was conducted before the influx of refugees fleeing conflict in Sudan, but the recommendations provided herein remain and are even more critical to implement given the shifting needs of affected populations. The mission objectives were to:

1. Investigate whether global policy initiatives—such as the Action Agenda on Internal Displacement, the ERC’s Flagship Initiative, and Grand Bargain National Reference Groups—were “trickling down” to South Sudan and diffusing throughout the humanitarian community.
2. Determine whether South Sudan’s humanitarian architecture allows for the robust, equitable inclusion of NGOs, including the South Sudan NGOF.
3. Evaluate country-specific partnership challenges and successes to improve global partnership processes and policies between NGOs, U.N. agencies, and the donor community.
4. Capture best practices and lessons learned to more efficiently and effectively support InterAction’s NGO Members, NGO fora, and broader humanitarian systems in other contexts and globally.

³ Throughout the report, “humanitarian architecture” refers to the general structure of humanitarian response that is standard across contexts: the cluster system, Country-Based Pooled Funds, NGO Forum(s), Humanitarian Country Team, and other structures that facilitate and enable humanitarian coordination at the country/context level.

METHODOLOGY

The line between the humanitarian and development sectors is blurry in South Sudan. Many actors are responding across the triple nexus of humanitarian, development, and peacebuilding programs. Due to limited time in-country, however, InterAction chose to focus solely on the humanitarian system.

During the preparation phase of this body of work, InterAction conducted a desk review of key literature regarding South Sudan's humanitarian context, including last year's Peer-to-Peer mission to South Sudan. The team spoke with various headquarters (HQ) and field-level NGO colleagues, the South Sudan NGOF Secretariat, Forum Steering Committee co-chairs, and ICVA counterparts to facilitate preliminary discussions around the scope and objectives of the mission.

InterAction circulated the mission Terms of Reference with staff and InterAction Members, global NGO Forum leads, and the South Sudan NGOF Director for their feedback and endorsement, as well as a broad range of stakeholders at the global level, including USAID's Bureau of Humanitarian Assistance, ECHO, the NEAR Network, ICVA's Regional Teams, WFP's NGO Unit, and UNHCR's Division of Strategic Planning and Results.

The mission team followed a participatory methodology consisting of key informant interviews and small focus group discussions to determine key challenges and possible solutions. These group and bilateral discussions were conducted in Juba, South Sudan, or virtually, with a diverse group of stakeholders, including representatives of the GoSS Relief and Rehabilitation Commission (RRC); the South Sudan NGOF Secretariat, co-chairs, and Joint Steering Committee; InterAction's INGO Members operating in South Sudan; local and national NGOs operating throughout the country, including two representatives from women-led organizations; and U.N. agencies, including OCHA, UNHCR, and WFP.

InterAction placed a special emphasis on speaking with local organizations, affected populations, and those involved in the South Sudan humanitarian architecture. Focus group discussions and key informant conversations were conducted with a series of broad framing questions but were largely managed as conversations to allow room for exploration.

At the end of the mission, the team held several debriefing conversations with key NGO stakeholders, including the NGOF Secretariat and co-chairs, to reflect on the key findings. The mission report outlines the findings and recommendations of the InterAction staff who participated in this field mission.

InterAction was especially impressed by and grateful for the candor of all stakeholders with whom they spoke. This was useful in working to determine root causes and underlying issues, and to identify potential solutions to make the response more efficient and create system-wide reform.

FINDINGS

Several mission findings merit immediate notice. The first is that although the report focuses on findings in South Sudan, many of the findings are global issues that are not unique to one context. Second, many issues and themes are tightly intertwined. Discussions regarding localization, for example, were not limited to a particular focus (such as direct funding to NNGOs) but tied into conversations regarding power dynamics, capacity, participation, and humanitarian coordination broadly. As a result, localization is clearly outlined alongside funding and, importantly, incorporated in relevant sections throughout the report.

Third, InterAction was dismayed by how little the concept of and commitment to Accountability to Affected Populations (AAP) surfaced during its mission, given the focus on AAP in the global humanitarian conversation. Only one key informant mentioned their connection to local communities, commitment to involving them in proposal and program development, and responses based on the needs outlined by those same communities. Additionally, and even more surprising, was the lack of self-reflection and ownership of stakeholders' own roles in the current humanitarian landscape (or dysfunction thereof). All stakeholders were quick to highlight others' shortcomings, but few noted their own organizations' weaknesses and what they could do to address those.

Finally, where possible, the report aligns with and builds on the [2022 South Sudan Peer-2-Peer Mission report](#) and associated recommendations, as many findings of this trip echoed those outlined in 2022. One member of InterAction's team, Sarah Fuhrman, was part of the 2022 Peer-2-Peer mission team.

South Sudan is a complex, diverse operating environment and the humanitarian sector is complex and inequitable. Even though system-wide transformation might not be immediately possible, InterAction urges all stakeholders to candidly reflect, self-assess, and determine what changes they can make in the near- and long-term to improve the system.

HUMANITARIAN COORDINATION & INCLUSION

International and national NGOs are the primary direct implementers of humanitarian aid and are therefore essential to responses. However, NGOs in South Sudan overwhelmingly feel that the coordination architecture is dominated by U.N. agencies and that they are not adequately informed, consulted, or included.

NGOs have gained representation in humanitarian coordination mechanisms in recent years. Three INGOs and two NNGOs (and one alternate) sit on the U.N. Humanitarian Country Team (HCT); two NNGOs and two INGOs (and one alternate) on the South Sudan Humanitarian Fund Advisory Board; and three NNGOs and two INGOs (and one alternate) on the Inter-Cluster Coordination Group (ICCG) Steering Committee. All focus group discussion (FGD) participants agreed that INGOs and NNGOs were visible and vocal in the clusters, at the national and sub-national levels. Despite successes, however, U.N. agencies remain disproportionately represented in coordination mechanisms. For example, an analysis of the [January 2023 ICCG Contact List](#) showed that of 60 contacts listed for the clusters, 75% were U.N. employees, 22% were INGO employees, and only 3% were NNGO employees⁴. Women-led organizations (WLOs), and presumably other organizations led by and supporting persons with diverse identity characteristics, are even more poorly represented in decision-making bodies.

Number of representatives aside, NGOs frequently reported that they did not feel their voices were listened to and their recommendations acted upon, reporting that U.N. agencies often make decisions that will impact operations—for example, during HCT meetings—without consulting implementing NGOs. Even when NGOs

⁴ Several interviewees mentioned that NGO representation was stronger at sub-national levels; InterAction does not have data to confirm this.

raised issues or registered complaints, they felt that this had no effect on the outcome. Some NNGOs also reported being censured by donors or intermediaries—such as the U.N. or INGOs—for speaking out too frequently or vehemently, despite commitments to AAP and localization.

A good example of this lack of inclusion is the ERC’s Flagship Initiative (FI). The FI is meant to enable Humanitarian Coordinators in four contexts, including South Sudan, to pilot new or different coordination approaches with the goal of better centering affected populations. In a presentation to InterAction Members on April 20, 2023, OCHA stressed that the FI was meant to be field-driven. Unfortunately, news or involvement with the FI does not appear to have trickled down to or throughout the South Sudan humanitarian system. Very few representatives that InterAction spoke with were familiar with it. Those that were stated they’d heard about it in passing, often from HQ colleagues, or briefly during the February HCT retreat. While there is an argument for OCHA designing the FI first and then rolling it out—because it is an OCHA-led initiative—this argument fails to acknowledge the impacts the FI will have on NGOs as the primary implementers, and therefore fails to be field-driven in practice. Efforts to redesign humanitarian coordination to better include affected communities, but that leave out vast swaths of those who deliver the assistance, including NNGOs, will never be truly inclusive.

The NGOF is another vital piece of the humanitarian architecture, and all FGD participants and key informants (KIs) agreed that South Sudan requires a strong NGO Forum. After a challenging period, the Forum has a new Executive Director and is regaining strength, albeit with greatly reduced staff (down to five from 17 full-time staff) trying to meet needs and expectations that were established when significantly more human resources and funding were available. In recent months, the Forum has taken on important work. For example, the NGOF continues to actively engage with the GoSS to create an enabling environment for NGOs on issues around access, renewal of operating licenses, and other critical issues, including organizing meetings between Forum members and the GoSS.

That being said, there is still room for the Forum to improve. One of the primary ways it can do this is by clarifying to itself and to external stakeholders what its role is, what it has done to unify and advocate for the NGO collective that it represents, and what it will do moving forward. The Forum has a strategy to guide its work through 2024, but that was developed when the Forum had significantly more staff than it currently does. The strategy is thus no longer feasible so the Forum should streamline and pare it down to make it achievable. This strategy should demonstrate how the Forum is working as a collective to meet the needs of its members and advance objectives to make the humanitarian response more efficient and equitable.

As the Forum continues the good work it is doing and advances a streamlined strategy, it should share regular updates with donors on its activities and accomplishments. Proactive and transparent communication are critical to regain confidence lost in the Forum in recent years (see Communications section below). Another option to improve the Forum-donor relationship is to request additional clarification on potential confidence-building measures to satisfy donor expectations while meeting the needs of the NGO community. The Forum Secretariat must initiate informative conversations with the donor community to evidence its good faith and keep donors apprised of its activities.

Additionally, tensions persist between INGOs and NNGOs, including within the Forum. It was difficult for InterAction to discern whether these are rooted in personalities, policies, or structure; whether they are deep-rooted differences of opinion; or (relatively) easily solvable. Interestingly, while INGOs identified donors and U.N. agencies as major contributors to challenges with coordination and inclusion, the majority of NNGOs pointed to INGOs. When questioned, NNGOs said they could not “see” the donor or U.N. agency issues as clearly as they saw the issues with INGOs, who were more likely to be their intermediaries. Given these different perspectives and given that the South Sudan NGOF is mandated to support INGOs and NNGOs, a member satisfaction survey might be useful in determining specific issue(s) and potential solutions that the Forum can lead on behalf of all NGOs.

Finally, there is some talk of the Forum hiring subnational-level coordinators, as they did in the past. The majority of FGD participants were supportive of this idea, seeing a clear need for a stronger, more cohesive NGO voice at the state or area level. Again, the majority agreed that this would be better left until the Forum

was stronger at a national level, but this idea aligns nicely with the movement toward area-based coordination in South Sudan.

Although donors are not generally as actively involved in coordination bodies as U.N. agencies and NGOs, they do have a role to play in the coordination and inclusion sphere. Most stakeholders agreed that additional information sharing from donors, especially when it comes to funding visibility, would be much appreciated. Furthermore, investing in critical coordination infrastructure such as the NGOF would go a long way to addressing many of the advocacy concerns among NGO counterparts. Donors are in a unique position to place emphasis on the inclusion of NGOs—especially national, women-led, and other NGOs led by people with diverse identity characteristics—throughout existing and future coordination structures. To maximize the value of money for taxpayers, donors should push to see direct implementers involved as much as possible.

COMMUNICATION

Communication is critical to the coordination, inclusion, and equal participation of all partners, and therefore essential to the success or failure of country-level humanitarian architecture. In South Sudan, however, stakeholders were unaware of their role in information dissemination, unclear on the appropriate information-sharing channels, and stated that existing channels were not functioning well. For example, several non-NGO stakeholders indicated frustration with communication within the NGO community, stating that NGO representatives on important coordination structures did not seem to know that part of their role is to share information. Conversely, NGOs often expressed that they were not given sufficient orientation to their roles or time before important decision-making sessions, such as the HCT, to consult with NGO constituencies fully and fairly, meaning that inputs were sometimes disjointed or not robust.

It is unclear whether these issues are evidence of a breakdown in communication, a gap to be filled by U.N. agencies as part of their role as coordinators, or a misunderstanding of the responsibilities as a seat-holder (likely some element of all). In response to these concerns (and similar ones in other contexts), OCHA has established an HCT onboarding program to ensure that HCT seat-holders are aware of their responsibilities, both as representatives of their constituencies and sharers of information. This is a welcome development that should be considered for other coordination mechanisms in South Sudan to reduce communication breakdowns. Another potential solution is closer coordination between the NGOF and U.N. agencies. For example, OCHA and the Forum used to hold quarterly meetings; these could be restarted as a discussion platform for coordination concerns.

Communication of ongoing and upcoming top-down humanitarian initiatives requires strengthening, as noted above regarding the ERC's Flagship Initiative. The same was true when InterAction asked FGDs and KIs about other top-down efforts, such as the Action Agenda on Internal Displacement or the Grand Bargain National Reference Groups (NRGs): few, if any, NGOs had heard of these processes. Those that had were usually INGOs who received the information from their HQ counterparts. Most NGOs and even some U.N. focal points that InterAction spoke with felt left out, disconnected from, and frustrated by the number of initiatives being pushed on South Sudan.

As one NGO representative stated, “The ideas keep coming—and changing.”

Policy conversations are not happening at a response level. Much of the policy work being done at HQ and the global level, although top-down in theory, is meant to be planned, developed, and implemented with a bottom-up approach—for example, taking broad concepts like the NRGs and tailoring them to meet the needs of a particular context. For these initiatives to not even be on the radar of field-level implementers demonstrates gaps in communication and poor proof-of-concept. Nor is it sufficient for the mere existence of an initiative to be communicated. The organizations responsible for implementing the initiative must share key information as early as possible, including the implementation timeframe; who will be responsible for ensuring

the initiative’s success; and how other humanitarian stakeholders will be included as equal partners in planning and development, in addition to implementation and operation. Reform initiatives will not be accountable or successful unless all stakeholders are included.

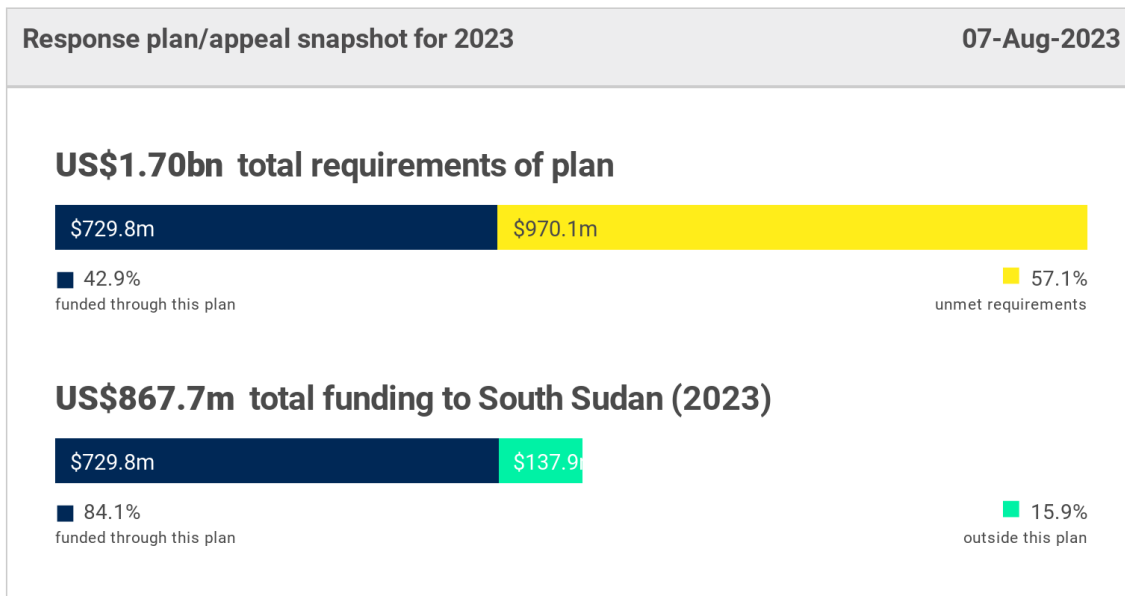
FINANCING, PARTNERSHIPS & LOCALIZATION

Although funding in South Sudan has remained fairly steady, increasing humanitarian needs require humanitarian organizations to stretch already-limited financial resources. Available funding must prioritize people with the most urgent needs and, as a result, gaps in the response often go unresolved. For example, several stakeholders explained that need in South Sudan is so great that humanitarians are largely not responding to IPC 2 and 3 food insecurity, and they cannot provide communities experiencing IPC 4 with full rations all year. Stakeholders raised other funding and partnership dilemmas, including donor and intermediary financing constraints, challenges associated with existing funding mechanisms, concerns related to compliance demands and risk sharing, and capacity gaps.

South Sudan Humanitarian Response Plan 2023



<https://fts.unocha.org/appeals/1111/summary>



South Sudan Humanitarian Response Plan 2023 (ETS UNOCHA)

Donor constraints, norms, and policies add complications to the humanitarian financing system in South Sudan. Staffing and resource limitations limit the number of NGOs a donor can partner with directly. One institutional donor explained that they cannot directly fund NNGOs in South Sudan because they simply do not have enough staff to manage many partnerships. Instead, they contribute to pooled funds (outlined below) or through intermediary agencies. Stakeholders—particularly NNGOs—also raised the issue of value for money: the more non-implementing actors handling funds, the more administrative and overhead costs eat up the program budget intended for people in need in South Sudan. Donors and U.N. agencies must ensure that downstream partners, especially NNGOs, are aware of internal constraints that limit direct financing and how those constraints trickle down through intermediaries as well. Given many institutional donors’ commitments to

localization, it is essential to support intermediaries to be better partners to NNGOs to rectify the disconnect with donors' and U.N. agencies' own policies. Over the long term, donors should engage in efforts to establish and support initiatives that prioritize access to funding for direct implementers.

The South Sudan Humanitarian Fund (SSHF), the country's pooled fund mechanism, is an important instrument that has increased direct funding opportunities to NNGOs over the last several years. In 2020, the fund was transferred from UNDP to OCHA management to align with global Country-based Pooled Fund (CBPF) practices. This shift required would-be SSHF partners to meet OCHA's more stringent capacity and partnership demands. According to [OCHA's Global Guidelines](#), CBPFs adopt a risk-based grant management approach which assigns a risk rating to new partners and existing partners over time based on performance. A partner's risk rating determines the degree of controls and oversight, with higher-risk partners receiving more demanding controls and levels of due diligence.

Stricter assessment measures mean that most NGOs are considered high-risk.

The new approach increased NGO frustration. As one stakeholder explained in the SSHF 2021 Annual Report, stricter assessment measures mean that most NGOs are considered high-risk, which imposes higher compliance demands (i.e., more financial spot checks) and sets mandatory award thresholds. More rigid and demanding awards require more human and financial resources for NGOs to manage—resources that are often underfunded and therefore contribute to the competition for funding in South Sudan. Several NGOs reported being eliminated from the SSHF partner pool altogether by this change, with no clear appeals process for reinstatement, though pooled fund managers explained that there is a reassessment period at the six-month or one-year mark after suspension or expulsion. Additionally, NGOs found to have submitted unacceptable expenditures with SSHF funds are suspended from partnership until they refund those costs—a task that poses a significant challenge for NNGOs.

Alternative financing options within and outside of the SSHF must be explored to address the humanitarian financing gap and diversify pooled humanitarian funding opportunities. A Save the Children initiative, the Local Response Pooled Fund (LRPF), is geared specifically toward funding local actors' interventions. The initiative is expected to release its first tranche of funding soon and presents a valuable learning opportunity that could be expanded in South Sudan and more broadly.

Beyond the CBPF, other donors have imposed funding thresholds and increased the associated requirements, as donors attribute increased risk management efforts to previous cases of and concerns regarding funding mismanagement. This follows trends in other humanitarian settings and is not unique to South Sudan.

Much like the SSHF, most stakeholders agreed that NNGOs are seen as higher-risk partners than INGOs, resulting in larger portions of funding going to or being managed by intermediaries. Institutional donors, including the SSHF, must therefore support intermediaries to be better partners to downstream and implementing NGOs. Moreover, fund management concerns are grounded in experience, as one U.N. agency explained that incidences of fraud and corruption across all funded programs in 2022 were only reported by INGOs. NNGOs must report these incidents to inspire deeper confidence in donors and intermediaries, as selecting credible and low-risk NNGO partners is challenging in a country with more than 1,800 registered local organizations. Consequently, many INGOs and U.N. agencies stated that they continue to work with local partners they already know and trust to do good work to reduce the risk to their own organization—which reduces access to funding opportunities for non-intermediary-partnered NNGOs.

All humanitarian organizations, from donors to frontline implementers, share a responsibility to mitigate risks where possible and manage them when they arise. Yet, many NNGO interviewees said that the current risk management approach indicates a lack of commitment to the original [Grand Bargain's](#) localization target of 25% of humanitarian funding going directly to local actors.

The donor and intermediary concerns are valid, but the current risk management approach appears to be working at cross-purposes and perhaps generating new challenges that have gone unaddressed. The risks of

fraud and abuse appear to be transferred unduly to intermediary and direct implementation organizations. Insufficient resources are channeled to manage grants, accompany partners, and strengthen and respond to organizations' unique capacity challenges and needs. Fewer "preferred partners" means the finite resources are directed to only a small handful of NNGOs. There are also disincentives to work with and develop new NNGO partners, such as the sheer number of NNGOs in the country, which alone makes determining who to partner with and when daunting.

For donors and implementing organizations alike, trying to meet demanding partnership requirements means other important strategic issues, such as localization and AAP, take a backseat. All of this adds to the tensions that are visible across humanitarian organizations in the country and is especially felt in the widening divide between INGOs and NNGOs.

To address these concerns, donors, U.N. agency stakeholders, and INGOs all recommended that NNGOs be given capacity trainings, saying there needs to be increased types of trainings available, increased funding to conduct them, and expanded capacity training access. NNGOs themselves were split. Some said they had received years of capacity strengthening and did not understand why they were not receiving more funding. Others asked for specific trainings to meet donor expectations and a few stakeholders gave conflicting testimony, pleading both sides.

For capacity trainings, all FGs and KIs outlined critical focus areas needing strengthening, including human resource management, organizational strategy development, financial management, compliance and transparency measures, and accountability measures to affected populations and donors. Additional reflection with NNGO colleagues emphasized the need for nuance when conducting capacity trainings with NNGO partners: existing capacities and gaps of each local organization vary depending on their expertise, past management experience, and method of training delivery. However, it is also crucial to capitalize on existing structures to conduct broadly-needed capacity strengthening (e.g., hosting an open-to-all training session on the use of QuickBooks) that could be beneficial for a broader NNGO audience. For example, the NGO Forum, once expanded, could incorporate broader financial, management, and administrative trainings into its organizational strategy to support members.

Clearly defining what "capacities" are lacking, or naming the specific areas requiring expansion of expertise, is paramount to ensuring that local organizations are expanding their knowledge base accordingly. Furthermore, adequate and measurable capacity building will require financial commitments from donors and intermediaries, no matter the methodology. To appropriately support NNGOs and address specific capacity gaps, donors and intermediaries must support training plans, provide adequate funding, and include clearly defined timeframes and success measures that NNGOs can put in place.

While capacity building can address risk and compliance concerns, much more is required to promote equitable partnerships and funding to increase localization in South Sudan. NNGO stakeholders explained that their funding comes mostly through intermediaries and they are often tasked with drafting and submitting concept notes to prove their added value in a proposal. These are often rejected without explanation from intermediaries, offering no chance to learn and improve for future funding opportunities.

One NNGO KI said that NNGOs in South Sudan "are treated like children who cannot be trusted" to make big decisions or manage significant funds.

One NNGO KI said that NNGOs in South Sudan "are treated like children who cannot be trusted" to make big decisions or manage significant funds, which reinforces the idea that NNGOs are not truly equal partners. One INGO counterpart said, "Localization cannot merely be an initiative to give money to local NGOs." NNGOs provided intentional efforts donors and intermediaries can take to address this sense of inequality: increasing direct funding to implementing organizations; approving security-related budget lines as NNGOs have sole access to many insecure parts of the country; committing to full and fair cost coverage; and establishing standardized overheads to facilitate organizational growth and flexible funds. These factors all contribute to increasing staffing continuity and sustainability of operations for NNGOs.

Much of the work to contextualize localization in South Sudan has already been done. For example, several key informants noted that the yet-to-be-finalized South Sudan HCT Localization Strategy addresses several of the factors detailed above. All actors in South Sudan’s humanitarian architecture should intentionally engage in the further development and implementation of this strategy, especially in terms of implementing recommendations within (several of which are included below). For sustainable impact, and to truly empower affected populations, this is the most effective risk-sharing and risk-management strategy.

All actors in South Sudan’s humanitarian architecture should intentionally engage in the further development and implementation of the South Sudan HCT Localization Strategy.

ADMINISTRATION & REPORTING

The majority of NGOs consulted during InterAction’s mission to South Sudan said that bilateral relationships with donors and U.N. agencies are generally positive, with minimal implementation delays once funding is awarded. When it came to challenges, however, the administrative burden of applying for funding and reporting on awards were the two areas of greatest concern.

Of key concern is the submission and approval process. The heavy administrative burden imposed by donors’ application guidelines and back-and-forth discussion of project narrative or budget cause approval delays that often contribute to gaps in humanitarian service provision. This is especially apparent for continuation proposals where well-known NGO partners face consequences due to gaps in service delivery. NGO stakeholders reported that delays damaged local communities’ perceptions of implementing NGOs. In especially dire situations, such as providing assistance to people experiencing IPC 4 or to areas prone to flooding in South Sudan’s rainy season, timely aid delivery can mean the difference between life and death for vulnerable people.

For NGOs that are longstanding partners of donors and U.N. agencies, each proposal application requires submission of a significant amount of information—such as proof of registration with the GoSS, organizational charter, context analysis that has not changed since the last proposal, etc.—that creates an administrative burden and produces delays, even for renewal of programming. Donors should evaluate their funding applications and guidelines to eliminate repetitive or redundant sections, remove unnecessary components, and determine if there are project components that can be ironed out after conditional approval, to facilitate quick and efficient funding to affected populations. Alternatively, donors should consider other ways to fund NGO counterparts, such as signing a standing memorandum of understanding (MoU) with partners that is refreshed or updated every 2 to 3 years rather than annually.

Administrative burden does not disappear once project agreements are signed. Stakeholders indicated that reporting is an additional challenge, given risk mitigation measures in South Sudan. Reporting timelines are variable and, except for stakeholders utilizing the [harmonized 8+3 reporting template](#), reporting templates vary. Complying with a wide range of reporting expectations takes an incredible amount of administrative work to draft, review, and submit reports in a timely manner, which is often significantly burdensome given that administrative costs are rarely funded fully and fairly. NNGOs in South Sudan are especially vulnerable to this issue, with most explaining that their total operational budgets are funded by one or two donors and therefore access to flexible funding to cover administrative costs is limited. Any delays in funding approval for program renewals results in needing to let go of staff for whom there is no current budget to cover, thereby contributing to high NNGO turnover rates.

There are a number of ways to address the reporting challenges. Donors should investigate alternative reporting scenarios, such as allowing NGO partners to submit one report covering all projects funded by an individual donor per reporting period (i.e., if an NGO has four grants funded by ECHO, they would submit one report every quarter that gives updates on all four programs). In keeping with the Grand Bargain’s effort

to harmonize the humanitarian system, donors and U.N. agencies must also consider transitioning to the 8+3 reporting template to streamline reporting processes. For actors that have particularly in-depth reporting requirements for downstream partners, donors must commit to fully and fairly funding staffing to meet those expectations, especially for NNGOs. Although these suggestions require buy-in and commitment from donors on the front end, they will better enable efficiency, effectiveness, and value for money in humanitarian programming in South Sudan.

RECOMMENDATIONS

InterAction emphasizes that the mentioned gaps are interconnected with deeply ingrained but adaptable behaviors and norms. It is important to note that none of these issues can be attributed to a single actor and the subsequent recommendations should not be viewed as isolated solutions. Instead, by comprehensively addressing these gaps and challenges, we can foster improvement throughout the system. All parties involved can initiate changes that will enhance the effectiveness of the humanitarian response in South Sudan.

InterAction understands that some recommendations will require financial commitments and funding in South Sudan is already in short supply (as outlined above). InterAction therefore encourages readers to begin by implementing recommendations that require no or minimal financial buy-in. Recommendations in bold offer viable solutions without imposing an additional financial burden.

Lastly, InterAction is aware of its positionality in making these recommendations. Throughout the drafting process, InterAction remained highly conscious of the need for situational and cultural relevance. It is imperative that those who implement these recommendations also prioritize these factors at the forefront of their minds.

ALL STAKEHOLDERS

▶ **Coordination & Inclusion**

- Commit to centering Accountability to Affected Populations throughout humanitarian programming—from planning to implementation to evaluation stages.

▶ **Communication**

- Share information on new initiatives as early as possible, especially critical details such as the implementation timeframe, leadership, and the need for equitable engagement of all stakeholders.

▶ **Financing, Partnerships & Localization**

- Intentionally engage with and support the newly drafted South Sudan Humanitarian Country Team Localization Strategy.

▶ **Administration & Reporting**

- Intentionally engage with and support the newly drafted South Sudan Humanitarian Country Team Localization Strategy. Reduce reporting requirements, utilize existing streamlining tools (such as the U.N. Partner Portal), and harmonize partnership practices.

DONORS (INCLUDING THE SOUTH SUDAN HUMANITARIAN FUND)

► Coordination & Inclusion

- Emphasize to all stakeholders that NGOs must be meaningfully included in coordination bodies, especially those led by or engaging NGOs (such as the NGO Forum), those identifying as women-led organizations, and other NGOs led by people with diverse identity characteristics.

► Communication

- Encourage strengthened top-down communication of global changes and humanitarian initiatives to facilitate their uptake and ensure they are contextually relevant.

► Financing, Partnerships & Localization

- Share funding visibility to downstream and implementing partners as far in advance as possible.
- Invest in critical coordination infrastructure such as the NGO Forum and transparently detail existing barriers to doing so for remediation.
- Offer clear justification to NGOs on why they've been eliminated from a pool of applicants or their proposals have not been accepted, as well as steps for remediation and improvement that will support their future applications.
- If unable to directly fund local NGOs, determine and support other methods of adequate financing to achieve localization targets.
- Clearly define NGO gaps in capacity and share expectations for resolution (i.e., examples of best practices) of these gaps. Where possible, set the expectation that program budgets must include relevant capacity-strengthening workshops and trainings for NNGOs.

► Administration & Reporting

- Evaluate funding guidelines and application materials to eliminate repetitive, redundant, and unnecessary sections. Additionally, consider methods to speed up the funding process, such as a standing renewable MoU (much like a U.N.-NGO partnership agreement), details that can be finalized after funding has been approved, etc.

U.N. AGENCIES

► Coordination & Inclusion

- When leading coordinating bodies such as the Humanitarian Country Team (HCT), ensure that any new seat holder (whether an organization rotating into a seat or new staff joining a seat-holding position) is informed of their roles and responsibilities as a participant via a standardized onboarding program.
- Encourage organizational behavior change in attitudes and treatment of NGOs to facilitate localization and prioritize intentional inclusion of NGOs—given their role as implementers—to truly attain equitable partnership. Where possible, establish indicators to measure successful inclusion of NGOs throughout coordination processes.
- Ensure that NGOs—including women-led organizations, refugee-led organizations, and those representing other marginalized groups—are present and equitably consulted during planning and decision-making processes that will impact direct implementers so that their perspectives can be adequately accounted for.
- Establish a strategy and defined timeframe for implementation of the [Peer-to-Peer mission recommendations](#).

► **Communication**

- Establish and maintain responsibility for information-sharing to all parties when making system-wide changes or kicking off new initiatives.

► **Financing, Partnerships & Localization**

- Share funding visibility with implementing partners as far in advance as feasible.
- Offer clear justification to NGOs regarding their elimination from a pool of applicants or non-acceptance of funding proposals, plus steps for remediation and improvement that will support their future applications.
- Clearly define NGO gaps in capacity and share expectations for resolution (i.e., templates of best practices) of these gaps. Commit to addressing gaps via funded partnerships that include a capacity assessment and strengthening activities for NNGO partners in the workplan and budget of future proposals.
- Particularly for OCHA, evaluate the degree to which risk management requirements in the Country-based Pooled Funds Global Guidelines and country policy and practice unduly transfer or increase risk to recipient partners.

► **Administration & Reporting**

- Reconsider question wording and terminology that might have colonial undertones.
- For U.N. agencies that have committed to reducing reporting requirements, establish indicators to determine whether these reductions are being adequately practiced.

SOUTH SUDAN NGO FORUM

► **Coordination & Inclusion**

- Update the NGO Forum (NGOF) organizational strategy in line with staffing constraints and member priorities. Disseminate the strategy with members and external stakeholders.
- Encourage NGO members to advocate on behalf of their collective constituency—not solely on behalf of their individual organizations—to donors and other stakeholders.
- Support NGOs in taking ownership of their roles on coordination mechanisms by offering new-representative trainings to establish expectations and needs of the NGO community.
- Push for U.N.-led and global initiatives to include clear, consistent pathways for including NGOs—and particularly NNGOs—in reform and decision-making initiatives, emphasizing their intentional inclusion from planning stages to completion.
- Determine potential avenues for strengthening NNGO capacities, perhaps by offering targeted trainings to membership.
- Advocate for clear, consistent pathways for inclusion of NGOs—and particularly NNGOs—in reform and other decision-making initiatives, emphasizing their intentional inclusion from planning stages through completion.

► **Communication**

- Proactively, transparently, and regularly (biweekly, monthly, etc.) communicate with donors and key stakeholders via the Secretariat/NGOF Director to share the Forum's activities, achievements, and collective NGO positioning on key challenges, concerns, and specific requests for support.

► **Financing, Partnerships & Localization**

- Determine actionable steps necessary to improve donor confidence and develop a specific, timebound action plan accordingly.

INGOS

► **Coordination & Inclusion**

- Take ownership of seat-holding roles in coordinating bodies and, via NGO Forum coordination, capitalize upon them to strengthen collective NGO positioning.
- Make intentional efforts to treat NNGOs as equal partners in implementation and decision-making bodies.

► **Communication**

- Holders of seats on coordinating bodies (such as the HCT) must make concerted efforts to communicate as far in advance as feasible with their constituencies regarding discussion points and action steps.
- Clearly establish positioning and advocacy to external stakeholders on behalf of the NGO community versus positioning on behalf of an individual organization to improve visibility of coordination among NGOs.

► **Financing, Partnerships & Localization**

- Commit to partnering with NNGOs as much as possible, including a capacity assessment and strengthening activities in the workplan and budget of future proposals.

► **Administration & Reporting**

- Evaluate funding guidelines and application materials to eliminate repetitive, redundant, and unnecessary sections. Additionally, consider methods to speed up the funding process, such as a standing renewable MoU (much like a U.N.-NGO partnership agreement), details that can be finalized after funding has been approved, etc.

NNGOS

► **Coordination & Inclusion**

- Take ownership of seat-holding roles in coordinating bodies and, via NGO Forum (NGOF) coordination, capitalize upon them to strengthen collective NGO positioning.

► **Communication**

- Holders of seats on coordinating bodies (such as the HCT) must make concerted efforts to communicate as far in advance as possible with their constituencies regarding discussion points and action steps.
- Clearly establish positioning and advocacy on behalf of the NGO community versus positioning on behalf of an individual organization when engaging with donors and intermediaries to improve visibility of coordination among NGOs.

► **Financing, Partnerships & Localization**

- Take up collective positioning on funding mechanisms as outlined by NGOF where possible.
- Communicate incidences of fraud and corruption to donors to increase their confidence in existing fraud and corruption management policies.

INTERACTION

▶ **Coordination & Inclusion**

- Advocate for clear, consistent pathways for inclusion of NGOs—and particularly NNGOs—in reform and other decision-making initiatives, emphasizing their intentional inclusion from planning stages through completion.

▶ **Communication**

- Support information flow from global to local and back again, disseminating via existing mechanisms such as country and thematic Working Groups and the NGO Fora coordination system.
- Emphasize at the global level the importance of critical details in determining new initiatives and mechanisms, such as the implementation timeframes, designated leadership, and plans for equitable engagement of all stakeholders.

▶ **Financing, Partnerships & Localization**

- Share Country-based Pooled Fund best practices from other country contexts regarding facilitation of NNGO funding with the South Sudan Humanitarian Fund and NGO Forum.

▶ **Administration & Reporting**

- Encourage innovation in harmonization across U.N. agencies and donors to facilitate access to funding for NNGOs.
- Maximize positioning on bodies like the Grand Bargain and Inter-Agency Standing Committee to reduce overall administrative burden on NGOs.

CONCLUSION

InterAction will present these findings to the international community within South Sudan and globally. These findings and recommendations will inform InterAction's positioning and advocacy points for humanitarian policy and practice. InterAction will continue to work with its Members and other stakeholders in the global humanitarian system, support the South Sudan NGO Forum as it works to rebuild and expand to a more robust coordination body, and leverage its unique position on bodies such as the Grand Bargain, Inter-Agency Standing Committee, and the Global Refugee Forum to advocate for improved humanitarian coordination within South Sudan and globally.

Finally, InterAction would like to thank the many stakeholders who took time to participate in focus group discussions and key informant interviews, set up meetings with critical constituencies such as the Government of South Sudan and national NGOs, and candidly shared their perspectives so openly to improve the existing coordination mechanisms in South Sudan. InterAction extends a special thanks to the NGO Forum staff and co-chairs for setting up meetings and for their flexibility and willingness to aid this initiative, and to USAID's Bureau for Humanitarian Assistance and the Swiss Agency for Development and Cooperation for funding this field trip.