

Initial Research: Provision and Conditions of Core/Overhead/Indirect Costs for Local/National Humanitarian Actors

Undertaken in support of the Localisation of Aid/[Workstream 2/Grand Bargain](#)
Co-chaired by IFRC and the Government of Switzerland

Funded by the Norwegian Red Cross and IFRC

December 2017

The opinions expressed in this publication do not necessarily represent the official policy of the International Federation of Red Cross and Red Crescent Societies or of individual National Red Cross or Red Crescent Societies or of the Swiss Government. They represent the views of the author only.

Raj RANA – Lead Consultant



Glossary of Abbreviations and Acronyms

BRC	British Red Cross
C4C	Charter for Change
CBPF	Country-Based Pooled Funds
CRS	Catholic Relief Services
CSO	Civil Society Organization
DFAT	Department of Foreign Affairs and Trade (Australia)
DfID	Department for International Development
ECHO	European Civil Protection and Humanitarian Aid Operations
FPA	Framework Partnership Agreement
FY	Financial Year
GB	Grand Bargain
GHD	Good Humanitarian Donorship
HRP	Humanitarian Response Plan
HQ	Headquarters
ICRC	International Committee of the Red Cross
IFRC	International Federation of Red Cross and Red Crescent Societies
IOM	International Organization for Migration
iNGO	International Non-Governmental Organization
KPI	Key Performance Indicator
L2GP	Local to Global Protection Initiative
InNGO	Local / National Non-Governmental Organization
NRC	Norwegian Refugee Council
NS	National Red Cross / Red Crescent Society
NSIA	National Society Investment Alliance
OCHA	Office for the Coordination of Humanitarian Affairs
RC/RC	Red Cross/Red Crescent
SCI	Save the Children International
SDC	Swiss Agency for Development and Cooperation
Sida	Swedish International Development Cooperation Agency
SNC	Somalia NGO Consortium
ToR	Terms of Reference
UN	United Nations
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Fund
USAID	United States Agency for International Development
WFP	World Food Programme
WHS	World Humanitarian Summit
WS	Workstream
WV	World Vision

Table of Contents

Glossary of Abbreviations and Acronyms	3
Table of Contents	4
1. Summary of Findings and Key Recommendations	5
1.1 Existing Research	6
1.2 Snapshot of Findings- Current Overhead Policy/Practice.....	7
1.3 Findings- Promising Examples of Policy + Practice.....	8
1.4 Why We Should Be Concerned	9
1.5 Possibilities for Future Study.....	10
1.6 Summary of Recommendations.....	11
2. Complete Research Findings	12
Annex 1 – Documents Consulted	27
Annex 2 – Contributing Stakeholders	29
Annex 3 – About the Consultant	30

1. Summary of Findings and Key Recommendations

Objective of the research: *Develop a broad overview of current policies and practice on the provision of overhead costs to local and national humanitarian actors by State donors, Pooled Funds, UN agencies, iNGOs, ICRC and IFRC, and formulate recommendations.*

*While UN/INGO counterparts received the bulk of the funding, and then subcontracted their Syrian "partners" to implement much of the actual assistance, **Syrian humanitarian actors were found to be much less likely to obtain overheads. Frequently they were not even able to recover the full costs of the relief activities they implement on behalf of donors and their so-called partners.** A standard 7% overhead coverage for Syrian NGOs, which is usual for international actors, was only allowed in a few cases such as the OCHA managed Humanitarian Pool Fund. High salary differences between UN agencies, INGOs and Syrian humanitarian actors were reported to hamper Syrian NGO's capacities as qualified staff leave for better-paid jobs with international organisations. ([L2GP](#), 2016)*

This short piece of research was undertaken on behalf of the IFRC, with funding provided by the Norwegian Red Cross. The issue of core and overhead costs to local and national actors has been an issue that emerges consistently in localization related conversations, including in the Grand Bargain Localization Workstream, co-chaired by IFRC and the Swiss Government. Specifically, local and national NGOs (InNGOs) and National Red Cross and Red Crescent (RC/RC) National Societies state that they do not benefit from the provision and conditions of un-earmarked core/overhead/admin costs as enjoyed by UN Agencies and iNGOs, which negatively impacts their capacity development and organizational sustainability. **Evidence has been anecdotal, with very limited specific investigation to understand the different funding policies and practices of those who finance InNGOs, or the degree to which this criticism is valid.**

The topic is complicated by a **broad set of similar terms, often used interchangeably**. All humanitarian organizations require infrastructure that enables them to deliver on their mission and objectives. This can include, amongst other items, office rent, utilities, support staff costs, IT, HR and financial systems, insurance and HQ support costs. Different stakeholders refer to these as core, indirect or non-project costs, general operating support, overhead, administration costs or fees and potentially, capacity building investments. **This report will use the term 'overhead' to generically represent the range of terms.**

Overhead costs can be reimbursed by a donor or partner at a fixed rate of reimbursement (unearmarked) or negotiated in terms of what each donor or partner defines as reasonable, justifiable and permitted overhead costs. The debate around cost recovery and the 'right' amount of overhead costs is not new to Northern civil society actors, and a substantial body of guidance on how to strategically implement cost recovery and charge adequate overhead costs exists ([Mango 2010](#), [Bond 2016](#), [NPQ 2016](#), to name a few examples).

A key lesson from this debate is that **there is no ideal rate for overheads, nor is the solution dependent on organisations receiving restricted or unrestricted overhead funding**. The traditional 7% overhead rate paid by many State Donors, Pooled Funds and UN Agencies would in any case not likely cover the entirety of HQ and Field infrastructure, systems and administrative costs. All international humanitarian actors have developed strategies which include their own fundraising efforts for unrestricted funds, negotiating core/HQ organisational grants in their country of origin and in presenting budgets that present their overhead costs as direct costs. The costs and efforts of humanitarian organisations to assemble different streams of funding to cover their overhead costs should not be underestimated: **iNGOs spend 80% more on their financial accounting and reporting than multinational corporations** ([HBR, 2013](#)).

The **research focussed on the supply side of overhead funding and not the demand (InNGOs)**. This was a deliberate and strategic choice: the research is focused on understanding the policy and

practice of those in a position to provide or influence provision of such funding to InNGOs. See more on the research methodology and challenges in Section 2.

The document has been written to provide a succinct overview. The remainder of Section 1 presents existing research (1.1) and then provides a snapshot of the current state of policy and practice (1.2), some promising examples by stakeholders (1.3), a broader commentary on the challenges (1.4) and potential areas for future study (1.5). Compiled recommendations are found in 1.6. Section 2 includes an introduction to the methodology and challenges and the complete research findings organized by stakeholder groupings.

A final note on the research report: while the research question was strictly focused on the provision and conditions of overheads to InNGOs, **readers will note that the answers often link back to stakeholder efforts to meet their Grand Bargain/Localisation commitments**. At times, payment of reasonable levels of overhead costs might seem tangential to the GB commitment that 25% of aid funding by 2020 will be delivered 'as directly as possible'. That said, there is a logic to this framing: **equitably covering overhead costs of InNGOs would indirectly contribute to efforts to localise funding, and also towards meeting the commitment to strengthen the capacity of local actors**.

1.1 Existing Research

The provision and conditions of **overhead costs for those humanitarian actors operating internationally** has benefited from substantial research. Key documents to consider in parallel to this research include:

- [Development Initiatives](#) (2008) Indirect Support Cost Study (for the GHD): remains a key document that charts the issue of overhead costs between State Donors and UN agencies, iNGOs, ICRC and IFRC. Written in the context of pressure to reduce indirect support cost charges. Highlights the complexity of comparison across donors/recipients, that **flat rate reimbursements do not provide a true picture of overhead costs**, and established that humanitarian actors operating internationally often benefit from supplemental core HQ and unrestricted funding which they use to cover remaining costs.
- [ICVA](#) (2015) Review of UN Project Partnership Agreements for NGO Implementation: undertaken to improve NGO understanding of different UN agencies' approaches to overhead costs to inform future consultations with same. Concluded that there was no clear exemplar of best partnership practice of the six UN agencies reviewed, and recommended greater transparency, embedding of the Principles of Partnership and harmonization.
- [HPG/ODI](#) (2017) undertook a financial analysis of a range of ECHO-funded projects to determine the net donor money that beneficiaries receive. Noted that local/national implementing partner costs and narrative reports were not always available and as such the study could not analyse the role or costs of InNGOs.

The provision and conditions of **overhead costs for local and national humanitarian actors** has seen limited specific study:

- [L2GP](#) (2016) undertook a detailed study of funding to InNGOs in Syria. The introductory quote above captures the situation succinctly. While Syrian humanitarian actors were delivering 75% of the assistance in 2014, they only received only 0.3% of direct and 9.3% of indirect funding.
- **Somalia NGO Consortium** and **NEAR** published a [global policy brief](#) (NEAR, 2017) advocating for a 10% allocation of unrestricted financing to InNGOs as a necessary commitment to achieve organizational capacity strengthening.
- **Charter for Change (C4C)** [Progress Report](#) 2016- 2017 includes signatory reporting against *Commitment 7: Robust organisational support and capacity strengthening*. Recommendations for next step include prioritising core funding for InNGOs and increasing organisational budgets for capacity building activities.

1.2 Snapshot of Findings- Current Overhead Policy/Practice

Realities for InNGOs: are largely unable to receive direct funding from State Donors. They enjoy the same conditions as international organisations from the CBPF- provided that they pass the rigorous assessment process to be considered for allocations. UN agencies offer them mixed policies and practice; only in some cases do they receive the same conditions as iNGOs. InNGOs are largely obliged to negotiate overhead costs with a significant portion of their iNGO partners, on a case-case basis. It could be assumed that some InNGOs could work around these overhead funding scenarios and constraints, by effectively projectising overhead costs as direct project costs. The worst-case anecdotes include InNGOs obliging staff to become volunteers as overheads were not submitted in project funding and no money was available for their salaries; or, of an InNGO 'taxing' its employees 30% of their salary to pay organisational overheads.

State Donors: only in rare cases do they provide funding directly to InNGOs, therefore the overhead question is somewhat redundant. In some cases, the obstacle to direct funding is a result of due diligence requirements or legal constraints. In the bulk of examples donors have taken the strategic decision to channel funding to InNGOs through their international partners, lowering their risk exposure and allowing them to manage fewer, larger grants to a limited number of partners. While they are keen to see InNGO overheads covered, they at best provide non-prescriptive guidance to their international funding partners- 'urging' partners to share or ensure adequate coverage of InNGO overhead costs. While they are taking stock of barriers and opportunities for greater engagement with InNGOs, they are often planning an increase in their funding to CBPFs and demanding stricter reporting from international partners on what proportion of grants is being delivered with- and through- InNGOs. These efforts are largely focused on their GB Localisation commitments, rather than on the specific provision of reasonable overheads for InNGOs. *Donors policy as concerns provision of overheads costs are typically in the public domain, though it is often unclear on whether direct funding relationships with InNGOs are in fact possible.*

OCHA CBPF: Their overhead policy offers equal treatment to international/national and local actors. Maximum of 7% of direct expenditures, non-earmarked. Globally, InNGOs received 23% of the total \$586 million in 18 CBPFs for 2017 (as of 19.12.2017). This has grown from 12% of the \$482 million in 14 countries in 2014). A broader range of pooled funds exist, though unlikely that these sources offer direct funding to InNGOs (see NRC 2017). *Policy and guidelines in the public domain (OCHA, 2017).*

UN Agencies: Often maintain different policies on overheads for international and local/national actors. UNICEF and UNHCR only offer HQ Support costs (flat 7% overhead) to organisations that are operating in a country other than their country of origin. Other overhead costs deemed reasonable and justifiable are reimbursed. There are efforts underway to align these policies across UN Agencies. *Overhead policy and guidelines are available in the public domain.*

iNGOs: generally speaking, there is an absence of formal iNGO policies as concerns provision and conditions of overheads. There appears to be institutional and individual soft commitments to 'reasonable and justifiable' coverage of overheads, with country directors and fundraising coordinators given latitude to develop and enforce a contextually relevant policy. Most iNGOs are committed to covering their InNGO partners' overheads, and find means to achieve this- sharing the overhead they receive from back donors, using other unrestricted funding streams, translating overhead costs into direct project costs. As iNGOs have not traditionally been asked to report on their implementing partner financial arrangements, there is a struggle for large iNGO families to capture and analyse patterns of practice. Charter for Change signatories, and often mid-sized iNGOs, are showing greater progress in understanding their practice, revising their policy/guidance and taking a stronger institutional stand to meet their GB and C4C commitments. *Overhead policy and guidelines generally not in place and therefore not available in the public domain.*

ICRC/IFRC: there are internal and Movement guidelines that give direction to the provision and volume of overhead costs. For IFRC, they pay overhead/indirect costs to NS who have a costing

policy and present reasonable costs. For ICRC, they undertake an assessment of financial capacity/management assessment of an NS partner, resulting in a grading from Level 1- 3. The grading determines whether they provide a restricted or unrestricted/flat rate reimbursement of overhead costs. *IFRC [guidelines](#) in public domain; ICRC guidelines are internal.*

Lessons and Recommendations:

- **Transparency:** all stakeholders should be obliged to publish clear and succinct policy and guidance on provision of overheads to InNGOs. Equally, InNGOs should publish their costing policies, allowing scrutiny of their institutional budgeting and cost recovery.
- **Capturing financial data on overhead costs and provision:** all stakeholders need to track and report their spending with- and through- InNGOs. Without greater tracking, it remains extremely challenging to analyse patterns of overhead policy and practice, at every level.
- **Adopting clear and actionable policy, practice, harmonization:** as a first level of priority, developing and adopting internal policy on provision of InNGO overheads is a challenge for Donors and INGOs. Without this, there is limited hope for harmonization within organisations operating in multiple countries, often through their international affiliates. In the least, InNGOs should be reimbursed for reasonable and justifiable overhead costs related to their operations.
- **Do all stakeholders have an equal appetite for change?:** the research reveals that this question of overheads is getting varied levels of attention across stakeholders and levels. Donors generally are somewhat distant from the question, often planning on increased funding to the CBPFs as a solution; UN Agencies are harmonizing their policies, largely not questioning why organizations operating outside of their home country receive different treatment than InNGOs; while iNGOs feel the greatest pressure to act, improve and justify their policy, practice to meet their GB/C4C commitments. **This distribution of commitment risks resulting in pushing pressure- and increase financial reporting demands- downwards to InNGOs, rather than resolving obstacles in humanitarian funding architecture for localisation of aid .**

1.3 Findings- Promising Examples of Policy + Practice

The previous section provides a snapshot of an issue that is challenging, complicated and receiving varying levels of attention and action by its stakeholders. The research did reveal the following snapshots of promising policy and practice as concerns provision of overheads to local and national partners (see Section 2 for complete findings):

State Donors- Danida, Sida:

They have integrated their GB commitments into their development cooperation and humanitarian strategies. Re-designed their partnership approach that stipulates improved local/national actor engagement. Their international partners are assessed on the quality and depth of partnerships and are required to work with local/national partners. They will strengthen their analysis of the proportion of grants transferred to local/national partners, the proportion required for capacity-building and support from international partners, and explore how they can connect development funding which would bring longer-term perspective and funding to strengthening local and national partners.

CBPF: provides the same conditions for international and local/national actors. Partners are provided feedback following their initial assessment and following implementation, allowing them to identify systems/processes where they should invest and improve performance. Their ambition to fund 15% of HRP country requirements is a win for State Donors, and likely for InNGOS as well.

iNGOs: greater progress in developing policy, capturing global practice and harmonizing approaches were illustrated in mid-sized iNGOs, typically C4C signatories. The latter has an explicit reference to the provision of adequate overheads to local and national partners.

- **Danish Church Aid:** Since 2016 have been tracking their funding to InNGOs. Planned strategy metric for 2018: 25% of their partners receive financial support towards overheads/core costs.
- **Norwegian Refugee Council:** NRC's intent is to apply to partners the same overhead conditions it receives from its back donors.

- **Oxfam:** In FY2018-2019, performance against C4C commitments is part of the Global Programmes steer and KPIs including facilitating access to funding to InNGOs with core costs and capacity strengthening.

IFRC: developed the [Guidelines for National Society Costing Policy: Best practices for project costing and indirect cost recovery procedures](#) (see also [Bond/Mango](#)). This guidance was created based on the observation that certain Participating National Societies (PNS) were not paying overhead costs to National Society (NS) partners. The IFRC now pays overhead costs to NS who have a costing policy and present reasonable costs.

Lessons and Recommendations:

- **Deliberate translation of GB/C4C commitments:** those stakeholders that had a clear(er) position on overheads were those that had actively attempted to integrate and translate their GB/C4C commitments into policy and practice. Generally, those that had not begun a deliberate process admitted looking for recommendations and examples of practice from their peers.
- **'It's a lot of work':** given that international partners have never been asked to explicitly analyse the proportion/type of funding providing to their local/national partners, such financial tracking required (and continues to require) significant investment. Smaller iNGOs were able to track up to 85% of funding to local/national partners, requiring intensive manual analysis of financial accounting.
- **Scaling CBPFs:** all things being equal, the CBPFs represent the fairest, systematized approach to ensuring provision of overheads to InNGOs. From a simple perspective of logic, they represent an easy way to ensure that InNGOs benefit from the same conditions as international humanitarian actors, while also enabling donors to fund a vehicle that also reinforces the 25% by 2020 commitment of Workstream 2.

1.4 Why We Should Be Concerned

Interviews with actors engaged in the Turkey Syria cross-border responses did identify examples of “good-practise partner- ships” but also examples not unlike those found in the for-profit sector. Some of these contractual agreements resemble the kind of business deal where international companies possess the know-how, “owns” the design, and controls access to investors and markets, while local “business partners” deliver cheap labour and low production costs - even if this is not the intent of the UN/INGO in question . (L2GP, 2016)

The L2GP study quoted above paints an unflattering image of how the humanitarian system is treating its local and national partners. The author suggests that the comparison with the private sector has not been taken far enough.

In its current state, the humanitarian sector appears to have adopted an approach to funding InNGOs that is strikingly similar to a corporate supply chain. The ILO's 2016 research, [Purchasing Practices and Working Conditions in Global Supply Chains](#), reported that **39 per cent of suppliers reported having accepted orders whose price did not allow them to cover their production costs** . Much of this research suggests that InNGOs are being similarly squeezed in the humanitarian system and, lacking access to core HQ grants and unrestricted funding sources, are quite possibly selling their services below cost to their international partners.

This corporate analogy should underline ethical questions for the humanitarian sector, that could be *differently* compelling than the current Localisation debate and its 25%/2020 ambition:

- **Are the international components of the humanitarian system committed to ensuring a living wage to local/national actors?**
- **Does the humanitarian system agree that its quasi corporate supply chain business model is congruous with its commitment to humanitarian principles?**

As illustrated 1,3, there are stakeholders that suggest an emerging analogous 'Fair Trade' movement for the humanitarian sector, amongst those actors that provide, or influence how overheads are provided to InNGOs. This represents an informed and ethical stance on reinforcing genuine partnerships, with an equitable sharing of funds, fair conditions and in promoting sustainability. This comparison is apt- but the realities of Fair Trade in the corporate sector are currently under dire threat, with [major corporates pulling out](#) (Guardian, 2017) of the gold standard of ethical trading and food certification.

Lessons and Recommendations:

- There appears to be a more fundamental, and possibly compelling, narrative around inconsistent and possibly insufficient provision of overhead funding to InNGOs: the humanitarian system has an ethical obligation to ensure the payment of a living wage to local and national partners, and that the spirit of the sector is not a multinational corporate's 'highest profits vs. lowest costs' philosophy. Addressing this challenge would oblige the international components of the humanitarian system to take broader responsibility for the sustainability, safety and actual costs of their InNGO partners.
- There are examples of mid-sized NGOs and donors that are adopting an approach similar to Fair Trade actors (see 1.3), framing their provision of overheads as efforts to ensure fair, equitable and full funding of partner costs.

1.5 Possibilities for Future Study

This research has at best provided a broad snapshot of realities. There are already recommendations for future study in the references cited in 1.1. Given the very limited study of provision and conditions to local and national humanitarian actors, specific suggestions for future study of this topic include:

- **There is a need for more evidence.** It would be helpful that national and regional NGO consortia undertake detailed research from the demand side of the question (InNGOs) in order to provide a balanced and informed view of the realities in the last mile of the humanitarian supply and funding chain. This could include analysis at national and regional levels, accounting for different contexts (conflict, natural disaster, complex emergencies, etc.), providing further examples of how InNGOs are- or are not- being reimbursed for reasonable and justifiable overhead costs and what obstacles they face.
- Current anecdotal evidence around the questions of overheads/InNGOs is typically around the Syria conflict, and this poses the intellectual risk that the strategic, policy and practice discussions are not a reflection of the broader realities of the humanitarian system. Whatever further studies are conducted, it is **imperative to consider a broader range of contexts to illustrate how policies and practice vary** by context.
- This research has only been able to collect a broad-brush overview from available stakeholders. Even on the supply side of overhead providers, there remain further major actors to consider (State Donors such as DfID and USAID), a broader range of Pooled Funds, other UN Agencies, iNGOs).
- The question of the provision and conditions of overheads to InNGOs typically spans several functions within organizations (programmes, financial management, donor relations, capacity building and partnership, to name a few). It would be helpful to **organise a roundtable discussion amongst Chief Financial Officers of humanitarian organizations, the respondents who are possibly the best placed to unpack the complexity and suggest simpler means to understand practice and potentially shape aligned policies amongst humanitarian actors.**

1.6 Summary of Recommendations

Policy Considerations	Future Study
<ul style="list-style-type: none"> • Transparency: all stakeholders should be obliged to publish clear and succinct policy and guidance on provision of overheads to InNGOs. Equally, InNGOs should publish their costing policies, allowing scrutiny of their institutional budgeting and cost recovery. • Capturing financial data on overhead costs and provision: all stakeholders need to track and report their spending with- and through- InNGOs. Without greater tracking, it remains extremely challenging to analyse patterns of overhead policy and practice, at every level. • Adopting clear and actionable policy, practice, harmonization: as a first level of priority, developing and adopting internal policy on provision of InNGO overheads is a challenge for Donors and iNGOs. Without this, there is limited hope for harmonization within organisations operating in multiple countries, often through their international affiliates. In the least, InNGOs should be reimbursed for reasonable and justifiable overhead costs related to their operations. • Do all stakeholders have an equal appetite for change?: the research reveals that this question of overheads is getting varied levels of attention across stakeholders and levels. Donors generally are somewhat distant from the question, often planning on increased funding to the CBPFs as a solution; UN Agencies are harmonizing their policies, largely not questioning why organizations operating outside of their home country receive different treatment than InNGOs; while iNGOs feel the greatest pressure to act, improve and justify their policy, practice to meet their GB/C4C commitments. This distribution of commitment risks resulting in pushing pressure- and increase financial reporting demands- downwards to InNGOs, rather than resolving obstacles in humanitarian funding architecture for localisation of aid. 	<ul style="list-style-type: none"> • There is a need for more evidence. It would be helpful that national and regional NGO consortia undertake detailed research from the demand side of the question (InNGOs) in order to provide a balanced and informed view of the realities in the last mile of the humanitarian supply and funding chain. This could include analysis at national and regional levels, accounting for different contexts (conflict, natural disaster, complex emergencies, etc.), providing further examples of how InNGOs are- or are not- being reimbursed for reasonable and justifiable overhead costs and what obstacles they face. • Current anecdotal evidence around the questions of overheads/InNGOs is typically around the Syria conflict, and this poses the intellectual risk that the strategic, policy and practice discussions are not a reflection of the broader realities of the humanitarian system. Whatever further studies are conducted, it is imperative to consider a broader range of contexts to illustrate how policies and practice vary by context. • This research has only been able to collect a broad-brush overview from available stakeholders. Even on the supply side of overhead providers, there remain further major actors to consider (State Donors such as DfID and USAID), a broader range of Pooled Funds, other UN Agencies, iNGOs). • The question of the provision and conditions of overheads to InNGOs typically spans several functions within organizations (programmes, financial management, donor relations, capacity building and partnership, to name a few). It would be helpful to organise a roundtable discussion amongst Chief Financial Officers of humanitarian organizations, the respondents who are possibly the best placed to unpack the complexity and suggest simpler means to understand practice and potentially shape aligned policies amongst humanitarian actors.
Ethical Considerations	Promising Practice
<ul style="list-style-type: none"> • There appears to be a more fundamental, and possibly compelling, narrative around inconsistent and possibly insufficient provision of overhead funding to InNGOs: the humanitarian system has an ethical obligation to ensure the payment of a living wage to local and national partners, and that the spirit of the sector is not a multinational corporate's 'highest profits vs. lowest costs' philosophy. Addressing this challenge would oblige the international components of the humanitarian system to take broader responsibility for the sustainability, safety and actual costs of their InNGO partners. • There are examples of mid-sized NGOs and donors that are adopting an approach similar to Fair Trade actors (see 1.3), framing their provision of overheads as efforts to ensure fair, equitable and full funding of partner costs. 	<ul style="list-style-type: none"> • Deliberate translation of GB/C4C commitments: those stakeholders that had a clear(-er) position on overheads were those that had actively attempted to integrate and translate their GB/C4C commitments into policy and practice. Generally, those that had not begun a deliberate process admitted looking for recommendations and examples of practice from their peers. • 'It's a lot of work': given that international partners have never been asked to explicitly analyse the proportion/type of funding providing to their local/national partners, such financial tracking required (and continues to require) significant investment. Smaller iNGOs were able to track up to 85% of funding to local/national partners, requiring intensive manual analysis of financial accounting. • Scaling CBPFs: all things being equal, the CBPFs represent the fairest, systematized approach to ensuring provision of overheads to InNGOs. From a simple perspective of logic, they represent an easy way to ensure that InNGOs benefit from the same conditions as international humanitarian actors, while also enabling donors to fund a vehicle that also reinforces the 25% by 2020 commitment of Workstream 2.

2. Complete Research Findings

This section presents the complete contributions provided from 30 respondents including State Donors, Pooled Fund, UN Agencies, iNGOs, RC/RC Movement and InNGOs. The data was collected and triangulated through:

- **Desk study** including literature review, study of stakeholder websites and their policies/guidance available in the public domain and [Grand Bargain Annual Self-Reporting 2017](#) (IASC, 2017) (see Annex 1, documents consulted)
- **Mix of interviews and email exchanges** with stakeholders based on a semi-structured questionnaire. This process included having a *portion of informants comment and validate their contribution to the research, in order to ensure accuracy* (see Annex 2)

Challenges in completing the research:

- The **research was undertaken at short notice and completed in a period of two weeks**; selection of informants was equally a function of availability at relatively short notice. There are a number of key stakeholders that were contacted and did not ultimately contribute to the research, including, DfID, IOM and USAID.
- Informants provided **responses that varied considerably in terms of level of detail**. This reflects that some organizations are further advanced in their understanding and policy as concerns provision of overheads to local/national partners; and, that the question spans several functions within organizations (programmes, financial management, donor relations, capacity building and partnership, to name a few), and it was a challenge to have a complete overview of organizational policy/practice.
- The **research focussed on the supply side of overhead funding and not the demand (InNGOs)**. This was a deliberate and strategic choice: the research is focused on understanding the policy and practice of those in a position to provide or influence provision of such funding to InNGOs. There remains a need to develop further evidence of this same issue at national and regional levels, providing further examples of how InNGOs are- or are not- being reimbursed for reasonable and justifiable overhead costs.

Actor Type	Organization	Policy	Practice (incl. obstacles)	Planned Changes
State Donors	DANIDA GB signatory	2017 Danish Strategy for Development Cooperation and Humanitarian Action is aligned with WHS and GB commitments, especially in joining up Denmark's humanitarian and development approaches.	iNGO partners are assessed on the quality and depth of partnerships, required to work with local/national partners. CSOs working in areas affected by armed conflict and recurrent natural disaster are specifically required to work with capacity of communities, national and local organizations, local authorities and/or relevant	Denmark will strengthen its analysis of the proportion of its grants transferred to local/national partners and the proportion required for capacity-building and support from international partners Continue to promote greater internal synergy between humanitarian-development funding

		<p>Re-designed partnership approach that stipulates improved local/national actor engagement.</p> <p>Denmark engages its strong NGO partners across the humanitarian-development nexus. Denmark encourages them to combine their civil society developmental efforts and their humanitarian efforts, in order to support durable solutions for displaced people and affected communities. Thus, Denmark insists that our Strategic NGO Partnerships look both ways.</p> <p>Decisions on humanitarian financing are taken at capital level, based on assessments of humanitarian needs. Denmark provides humanitarian funding to international organisations and civil society partner organizations that work with InNGOs, thereby provides indirect funding to InNGOs. Denmark does provide some funding directly to InNGOs in cases of conflict/natural disaster, when there is a Danish embassy present in the country context.</p>	<p>civil society actors aimed at building local capacity to better prepared for and respond to crises, in particular in favour of vulnerable and marginalised groups.</p> <p>Challenged to get complete data on the proportion of funds provided to local/national actors.</p> <p>iNGOs are asked to strengthen analysis of proportion of their funding that is transferred to local partners and the proportion that is used for capacity building. INGOS are requested to adhere to IATI Standard and in this way to ensure transparency on aid streams going to their national and local partners.</p> <p>Request to UN agencies to provide details on their sub-contracting arrangements with local/national partners to see that they also benefit from multi-year funding agreements.</p>	<p>and in promoting blended financial instruments.</p> <p>Increased financial contribution to CBPFs- Denmark was the fifth largest donor in 2016.</p>
	<p>DFAT GB signatory</p>	<p>In theory, no distinction between iNGOs and InNGOs. Bulk of DFAT partnership are with accredited Australian NGOs.</p>	<p>DFAT funds Australian NGOs who are required to support and work with local/national partners. No stipulation on how InNGO overhead is to be addressed. It is expected that iNGOs will replicate</p>	<p>The capacity of local NGOs and how DFAT-supported iNGOs address the issue will be a matter that DFAT's keeps under review during 2018.</p>

		Australia does directly fund local and national civil society organisations in developing countries, both for development and humanitarian activities. In 2016-17 some 600 civil society organisations participated in Australia's Direct Aid Program (DAP) in 112 countries valued at AUD22 million.	DFAT due diligence in their partnerships. Onus for accountability is on the iNGO. It is understood that local and national actors may require capacity development to meet due diligence requirements.	
	ECHO GB signatory	Does not partner directly with InNGO in-country. No written policy on how overhead costs are shared between FPA and local/national partners.	Sharing of overheads is left to the discretion of FPA partners. DG ECHO still faces regulatory barriers to funding directly local and national actors.	FPA is to be reviewed in 2019; localisation considerations may be reviewed in this process through 2018. DG ECHO has initiated an internal process to identify steps and initiatives to move forward for more direct funding, within the limits of its current legal environment.
	German Foreign Office GB signatory	Does not provide overheads to NGOs headquartered in Germany. Does not fund InNGOs directly.	As German or German-based NGOs receive no overheads, no overheads to share with local/national partners. German Foreign Office lack capacity to deliver more grants. Increased German contribution to Pooled Fund from 40 to 175 million in 2017.	In 2018, will develop a policy of 7% overheads to iNGOs and the stipulation of 'an appropriate percentage to be shared with local/national partners'.
	Irish Aid GB signatory	Provides 7% overheads to the UN. Policy for NGOs is more directive,	Urging Pooled Funds and iNGOs to work with l/n actors where	Remains open to new research and recommendations on how Irish Aid should adapt their policies.

		<p>an overall limit of 6% is applied to iNGO grants.</p> <p>Does not fund InNGOs directly. Guidance to iNGOs on overhead for local/national partners is not prescriptive.</p>	<p>possible and appropriate, in ways that build capacity.</p> <p>Does not want to stipulate a target percentage coverage for overheads.</p>	
	<p>SDC GB signatory</p>	<p>Some funding provided directly to InNGOs.</p> <p>Overhead vary depending on partner, context, programme/project. However, in general SDC provides the following overheads:</p> <p>UN: 7% overheads.</p> <p>Two forms of cooperation with NGOs with specific conditions for overheads:</p> <p><i>Mandates</i>– SDC mandates specialised NGO to carry out the implementing of clearly-defined programme/project, or providing thematic and technical advice. Mandates are subject to competitive tendering and service oriented remuneration (based on fees for services) is applied.</p> <p><i>Contributions</i>– SDC supports programmes/projects carried out by NGOs under their own responsibility and in</p>	<p>Generally urging Pooled Funds to work with local national actors where possible and appropriate, in ways that build capacity.</p> <p>Launched limited number of projects in capacity- investment (Syria, via CONCERN for 10 local NGOs).</p> <p>Launched the National Societies Investment Mechanism, co-hosted by the IFRC/ICRC; should perform as an effective instrument to localise aid.</p>	<p>Increased contribution to CBPFs if possible.</p> <p>SDC participates in the pilot under workstream 9 “Harmonized reporting” and contributes to the testing phase of the reporting template in Iraq. If successful, SDC will replicate this approach in other contexts.</p> <p>Remains open to new research and recommendations.</p>

		<p>accordance with their core competences and capacities. Contributions by SDC are subject to negotiations, but are usually no more than 50% of the programme/project budget. Overheads for iNGOs vary depending on the context, but could go up to 10%. Overheads for l/n NGOs again depend on the context, but could range between 3 – 7%.</p>		
	<p>SIDA GB signatory</p>	<p>Sida Strategy 2017-2020 integrates WHS commitments and GB. Estimated that 12% of Sida's 2015 aid was allocated to local actors (pooled funds and traceable financial flows to Sida international partners).</p> <p>Guidelines for Sida Support for Humanitarian Action Through CSOs includes a requirement for partners to indicate how proposed collaboration will strengthen local partners. Their overhead costs are reimbursed at a fixed rate of a maximum of 7%.</p> <p>Does not provide direct funding to local authorities and organisations. There is no legal obstacle to direct funding.</p>	<p>Strategic decisions to reinforce localisation: Sweden is the second largest donor to CBPF and amongst largest donors to the RC/RC Movement.</p> <p>Sida applied GHD principles in partnerships, and privileges flexibility and dialogue.</p>	<p>Will urge partners to present the total amount and proportion of funds transferred to local partners.</p> <p>Will identify one agreement modality, through which Sida could possibly directly finance and cooperate with local actors.</p> <p>Will contribute to improving capacity of local/national actors, including exploring how Sida can connect its development funding with a longer-term perspective to strengthening partners.</p>
<p>Pooled Funds</p>	<p>CBPF/OCHA GB signatory</p>	<p>Policy offers equal treatment to international/national and local</p>	<p>Money is allocated through an inclusive and transparent process</p>	<p>CBPF aspiration remains a target that their funding will represent</p>

		<p>actors. Maximum of 7% of direct expenditures, non-earmarked.</p> <p>Globally, InNGOs received 23% of the total \$586 million in 18 CBPGs for 2017 (as of 19.12.2017). This has grown from 12% of the \$482 million in 14 countries in 2014).</p>	<p>in support of priorities set out in coordinated Humanitarian Response Plans. This ensures that funding is available and prioritized at the local level by those closest to people in need and independent of the type of organization (UN, iNGO, InNGO, etc.)</p> <p>Rigorous capacity assessment required for InNGOs to be eligible for CBPF allocation. Feedback is provided during assessment process, and after implementation, permitting partners to address assessed weaknesses in capacity and systems.</p> <p>CBPF are flexible in allowing its grantees operational costs that enable them to deliver their planned results, which for local/national NGOs can include building capacity and infrastructure investment. As the operating costs are often higher in areas of conflict, this flexibility is critical to cover real costs incurred by partners in exceptional contexts.</p>	<p>15% of HRP country requirements. This target is close to being met in a portion of CBPF countries.</p>
	<p>UNHCR GB signatory</p>	<p>UNHCR provides project headquarters support costs to partners that operate in countries other than their country of origin. These costs are related to administration, oversight and technical support from HQ to the</p>	<p>Should there be specific need where policy cannot be applied, it is reviewed on case by case, and the appropriate solutions are adopted.</p>	<p>UNHCR/WFP/UNICEF partnership agreements including cost categories (short term) while maintaining the core business models of respective organisations, is agreed by all agencies as a realistic option for</p>

		<p>operations in other countries. It is about 7% with certain amounts excluded depending on the nature of the projects/operation.</p> <p>For national partners UNHCR covers the reasonable costs depending on needs and available resources for the costs of administration, oversight and technical support. Many national partners also enjoy the support of capacity enhancement on case by case basis. It is determined at the operation level.</p> <p>In 2016, UNHCR transferred 16% of its total expenditure to local/national partners.</p>		<p>further analysis and exploration for harmonization.</p>
	<p>UNICEF GB signatory</p>	<p>Programme management costs are budgeted as part of the programme document work plans signed with CSO implementing partners under three standard activities: i. in-country management and support staff; ii. operational costs; and iii. planning, monitoring, evaluation and communication. All these costs are pro-rated to their contribution to the programme.</p> <p>In addition to programme management costs, UNICEF provides headquarters support costs to international CSOs for</p>	<p>Practical solutions are sought if donor conditions exclude the provision of HQ support costs from eligible expenditures.</p>	<p>UNICEF, WFP and UNHCR are working together to develop a UN Partner Portal an IT platform linked to some of the Grand Bargain commitments on reduction of management costs, and localization. The portal will support harmonised due diligence assessments of CSOs, and strengthen participation of local and national actors. It will provide a platform for civil society actors—including both those with a long history of partnership with the UN, as well as those with no prior UN partnership experience—to make themselves known to the UN, view</p>

		<p>overseeing and supporting programme implementation from a headquarters that is outside of the country of implementation. They are included in programme documents as a standard, flat rate of 7% of the cash transfer component, with certain amounts excluded (bulk procurement, cash to beneficiaries). HQ support costs are reimbursed based on actual expenditures on a quarterly basis upon reporting.</p> <p>On a case-by-case basis, Headquarters Support Costs can be paid to national CSOs. They are not usually paid to national CSOs which maintain headquarters in the capital city of the programme country, since technical support from staff in these locations can be included as part of Programme Costs, if required.</p> <p>In 2016, UNICEF provided 30% of its humanitarian funding to local and national actors, with a target of reaching 34% by 2021.</p>		<p>partnership opportunities, and submit proposals for collaboration.</p>
	<p>WFP GB signatory</p>	<p>WFP has more than 1000 civil society partners engaged in 75 per cent of its programmes. Some eighty per cent of these partners are local as opposed to international.</p>		<p>WFP is simplifying and harmonising partnership processes to facilitate both improved collaboration with established NGO partners and new opportunities for local actors</p>

		<p>WFP's 2017-2021 Strategic Plan commits WFP to "make(ing) strategic demand-side investments in the capacity strengthening of relevant national and local NGOs, farmers' organisations and other community-based organisations to help communities lead and sustain their own fight against hunger and achieve SDG2." The Strategic Plan also commits WFP to paying special attention to strengthening the performance capacity of local crisis responders.</p> <p>Provides the same 7% overhead costs (management service fee, paid as a fixed percentage of direct costs as per invoices submitted) all cooperating partners with whom WFP signs a FLA agreement. Its policy is enshrined in the publicly available <u>Field Level Agreement Conditions</u>.</p>		<p>WFP is working with UNHCR and UNICEF to explore opportunities for improving processes for our operational partners. An inter-agency group is exploring the feasibility of a shared platform (or 'Partner Portal') through which initial eligibility assessments (basic due diligence) could be performed and partner registration and profiles recorded. The group is exploring opportunities to harmonise agreement and budget templates while the reporting template harmonisation is underway.</p>
<p>iNGOs</p>	<p>CAFOD</p> <p>GB signatory Charter for Change signatory</p>	<p>Shares overhead costs 50/50 with partners, often takes the form of joint proposals as CAFOD has access to Northern donors.</p> <p>Charter for Change founding signatory.</p>	<p>Practice reflects policy. CAFOD's financial report for FY 2015-2016 indicates that approx. 55% of CAFOD's programme spend is allocated to partner organisations. While their financial reporting system was not setup to distinguish between international and national partners, manual analysis suggests hat around 20%</p>	

			of their funding is to local and national organizations.	
	CARE GB signatory Charter for Change signatory	<p>The majority of CARE's humanitarian work is delivered with local/national partners. In addition, partnership is one of the key tenets of CARE's Humanitarian and Programme Strategies.</p> <p>No unified CARE-wide policy for providing/sharing overheads with local and national partners.</p>	<p>CARE has initiated an internal review process of what partnership barriers currently exist within the organization.</p> <p>Current practice varies greatly within the organization, with some Country Offices/regions providing overheads either as part of joint projects or in capacity strengthening type initiatives. Overheads can be fully flexible in some cases, or earmarked. CARE has several 'lead' members each with its respective approach for passing on overheads to local partners. Work has started on alignment between approaches, aiming for a minimum standard. This is part of a CARE-wide approach to localization, which was developed and endorsed in 2017 by CARE National Directors.</p>	<p>CARE will adapt its measurement systems to capture spending through local partners, applying collectively agreed definitions.</p> <p>CARE is reducing inefficiencies and adapting internal systems to make them more agile and fit for partnering in emergency response (with a focus on procurement and financial management systems).</p>
	CRS GB signatory Charter for Change signatory	<p>CRS has a policy that defines the criteria to be used to review and approve requests from sub recipients (which includes local and national NGO partners) to apply indirect costs (overhead/administrative costs) to US Government funded sub awards under Assistance</p>	<p>Follows donor policy as concerns conditions and provision of overhead costs. CRS ensures that its local/national partners have the required systems for determining and justifying indirect costs. Supports some partners to include justifiable administrative costs as direct cost, and in developing systems for overhead costs.</p>	<p>No plans to change CRS approach as their policy is a reflection of donor policies.</p> <p>Efforts include helping local partners to include cost as direct cost when they can be justified. CRS is also very open and willing to help partners to establish</p>

		<p>instruments (Grants and Cooperative Agreements).</p> <p>CRS works with partners to identify and ensure all justified cost are included.</p>	<p>Where partners can demonstrate they have effective systems that separate direct/indirect costs, it is feasible to charge indirect costs at a fixed rate.</p> <p>Uses other funding streams to cover overhead costs in cases where donors do not.</p> <p>CRS measures the amount of resources dedicated to partnership and capacity strengthening.</p>	<p>systems to identify and track admin costs.</p> <p>Capacity strengthening in alignment with a joint assessment process is focused on helping interested partners improve systems that should lead to increased ability to cover administrative cost.</p>
	<p>Danish Church Aid Charter for Change signatory</p>	<p>Partnership policy of 2014 expresses intent without specifics.</p>	<p>Since 2016 have been tracking their funding to InNGOs.</p> <p>Their business model is as a partnership organization; overheads are often integral to ongoing support partnerships. Country directors have the flexibility to include a reasonable space for overhead costs and negotiate with back donors.</p>	<p>Planned strategy metric for 2018: 25% of their partners receive financial support towards overheads/core costs.</p>
	<p>NRC GB signatory</p>	<p>Internal policy is set by HQ. In the process of finalizing guidance on partnership. Provision of overheads is also a function of back donor restrictions. NRC's intent is to apply to partners the conditions NRC receives from its back donors.</p>	<p>Field staff have the space to negotiate reasonable overhead costs for local/national partners. Loosely overhead is never more than 20%, relative to the type of programming, donor conditions, etc. In a limited number of contexts, donor audits are a risk issue for NRC, as the organization can be held financially liable for the reporting/systems of its partners,</p>	<p>Consistently looking at how NRC engages in partnerships.</p>

			leading to a more conservative approach.	
	Oxfam GB signatory Charter for Change signatory	<p>No specific written policy. As the Oxfam confederation is going through a change process, alignment of Oxfam affiliate policies is underway.</p> <p>Partnership principles encourages covering of partner core costs. Oxfam International is developing a partnership policy and implementation support guidance to translate principles into practice.</p>	<p>Of the 20 Oxfam affiliates, 5 provide support functions, all of which currently have different policies and processes.</p> <p>Developing an overview of costs being paid to local/national partners. In general, the overheads paid are conditioned by donor and country operation conditions. Funding coordinators are negotiating with donors in each project and process to cover these partner costs, with mixed results.</p> <p>Projectisation of funding is a key obstacle to doing better, as it means less unrestricted funding.</p>	<p>Oxfam signed the GB in Spring 2017.</p> <p>Is working to include partner core costs guidelines in the institutional funding strategy and guidance at International and affiliate levels.</p> <p>Is working with Oxfam affiliates to include disaggregated funding to local/national partners in their financial systems.</p> <p>In FY2018-2019, performance against C4C commitments is part of the Global Programmes steer and KPIs including facilitating access to funding to InNGOs with core costs and capacity strengthening.</p> <p>Also for FY2018-2019, Executive Director's steer to affiliates includes Partnerships commitments and transparency on funding flows as part of steer.</p>
	Tearfund Charter for Change signatory	Local and National NGO partners are able to claim a contribution towards the administrative running cost (central management and administration salaries, office supplies, telecommunications, office rent and utilities, audit and	In cases where the Implementing Partner considers that the actual costs of supporting the programme will exceed this amount, a separate detailed budget for central administration costs in justification of a claim for a higher	

		Board expenses, depreciation of capital assets etc). This is normally restricted to 10% of the total Direct Operational/Programme Costs of the programme.	administration charge may be submitted. The administration budget must show clearly the total costs of administering the Implementing Partner (ie. all the Indirect Costs), the sources of income available to set against those costs, and how and why you divided up the balance between the different programmes to be managed by the Implementing Partner.	
	World Vision International GB signatory	<p>There is an internal policy that captures their way of working/partnering within WV and with external local/national partners</p> <p>WV's business model is one of partnering of Northern and Southern components of the federation. These grants ensure that WV national actors benefit from overheads as an INGO.</p>	<p>Follows donor policies in sharing/covering overhead costs of local/national partners.</p> <p>WV has historically supplemented donor provision of overheads with their own unrestricted funding sources.</p> <p>In cases where WV works with non-WV partners, overhead costs are negotiated on a case-by-case basis. At times, such partners are recruited after the award of a grant.</p>	<p>Efforts to track and differentiate funding to local/national actors requires further investment, as it was not necessary in the existing way of working.</p> <p>Challenge remains that of ensuring adequate unrestricted funding to maintain their current approach.</p>
RC/RC	Canadian Red Cross	No policy. <i>De facto</i> overheads have never been higher than 7.5% (IFRC standard rate) and have been paid since 2010. The overheads paid to NS partners come out the Canadian Red Cross overhead.	Support overhead costs of National Society (NS) partners, in line with the back donor conditions and reporting requirements. Same for use of unrestricted funds. Dependent on the NS partner's accountability mechanism. They maintain the right to audit partners.	

			When they work directly with a NS, the bulk of funding goes directly to partner and mid-term programming in 12 countries for capacity building.	
IFRC GB signatory	IFRC has developed the Guidelines for National Society Costing Policy: Best practices for project costing and indirect cost recovery procedures . This guidance was created based on the observation that certain Participating National Societies (PNS) were not paying overhead/indirect costs to National Society (NS) partners. The IFRC pays overhead/indirect costs to NS who have a costing policy and present reasonable costs.	The intent of the guidelines is to promote fiscal discipline amongst NS and to ensure that they are given fair compensation by their partners. Practice is ultimately mixed: <ul style="list-style-type: none"> • Ideally the costing policy and reasonable costs are covered by partners. • Some partners are driven by their- or their back donor-policies and conditions, so compromises are found. 	With ICRC, jointly launched the National Society Investment Alliance (NSIA, IFRC 2017) in late 2017, a pooled fund that is focused on strengthening institutional capacities of NS.	
ICRC GB signatory	ICRC has internal guidelines that dictate the policy and procedures around partnership with National Societies and their financial conditions. Provision of overheads is a function of a financial capacity/management assessment of NS partner, resulting in a grading from Level 1- 3. Level 1 requires invoicing of all administrative/indirect costs. Those partners assessed as levels	The guidelines give ICRC and NS a clear basis for discussion. Eventual partnerships and provision of overheads can be adapted to specific contexts and requirements. In some examples, the ICRC pays overheads in the framework of capacity building programs (e.g. purchase of computers for the NS). In some case, the ICRC faces the specific challenge of financial	With IFRC, jointly launched the National Society Investment Alliance (NSIA, IFRC 2017) in late 2017, a pooled fund that is focused on strengthening institutional capacities of NS.	

		2- 3 are eligible for provision of overheads at a fixed maximum rate of 7%.	capacity building of its partners in situations of conflict.	
InNGOs	MERCY Malaysia Charter for Change endorser	Inconsistent access to overheads obliges organization to be conservative- cannot overextend itself, take risks.	Have accessed Pooled Funds in Myanmar. Negotiates overheads on a case-by-case basis, with a range of donors.	Concerned that other actors (private sector, foundations) also adopting similarly strict policies re: overheads.
	Syrian Relief (diaspora NGO, registered in UK) GB signatory Charter for Change endorser	Has negotiated overhead costs on an <i>ad hoc</i> basis. Not received direct funding to date. Has received resources from Pooled Fund.	Practice has evolved since 2011. Initially, iNGO were highly active to build InNGO capacities. Those capacities now in place, InNGOs are strong partners and negotiate their overhead costs with each international partner. Specific issues such as access to war-risks insurance for I/n staff, or standard practice in compensating families are not being addressed.	As iNGO presence in Turkey decreases, expects that direct funding relationships will become a reality. Applying for FPAs with Northern donors.

Annex 1 – Documents Consulted

Bond, 2016. Cost Recovery What it Means for CSOs.
<https://www.bond.org.uk/sites/default/files/resource-documents/cost-recovery-0216.pdf>

Charter for Change (C4C), 2016. Charter for Change: Localisation of Humanitarian Aid.
<https://charter4change.org>

Charter for Change, 2017. From commitments to action: Progress Report 2016- 2017.
https://charter4change.files.wordpress.com/2015/08/c4c_progressreport_2017_web.pdf

CIDA, 2008. Overhead Compensation Policy for CIDA's Contribution Agreements.
<http://www.international.gc.ca/development-developpement/partners-partenaires/bt-oa/overhead-compensation.aspx?lang=eng>

DanChurchAid, 2014. Partnership Policy.
<https://www.danchurchaid.org/content/download/.../1/.../Partnership+Policy+2014.pdf>

Development Initiatives (DI), 2008. Indirect Support Cost Study: Final Report.
www.lacs.ps/documentsShow.aspx?ATT_ID=4483

DfID, no date. Programme Expenditure: Eligible Cost Guidance.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/652367/Cost-Eligibility-Guidance.pdf

ECHO, 2014. Funding Partnership Agreement.
https://ec.europa.eu/echo/partnerships/humanitarian-partners_en

Gates Foundation, 2017. Indirect Cost Policy.
https://docs.gatesfoundation.org/documents/indirect_cost_policy.pdf

Guardian, 2017. Move by UK supermarkets threatens to bring Fairtrade crashing down.
<https://www.theguardian.com/global-development/2017/jun/24/fairtrade-crashing-down-sainsburys-tesco-tea-growers-nairobi>

Harvard Business Review (HBR), 2013. Global NGOs Spend More on Accounting Than Multinationals. <https://hbr.org/2013/04/the-efficiency-trap-of-global>

HPG/ODI, 2017. From Grand Bargain to beneficiary: An analysis of funding flows through the humanitarian system. <https://www.odi.org/sites/odi.org.uk/files/resource-documents/11588.pdf>

IASC, 2017. Grand Bargain Annual Self-Reporting Exercise (Database).
<https://interagencystandingcommittee.org/grand-bargain-hosted-iasc>

ICVA, 2015. A comparison review of UN project partnership agreements for NGO implementation of humanitarian projects.
https://www.icvanetwork.org/system/files/versions/UN%20Partnership%20Agreement%20Review%201%20June%202015.web_.pdf

IFRC, 2016. Guidelines for National Society Costing Policy.
<http://media.ifrc.org/ifrc/document/guidelines-national-society-costing-policy/>

IFRC, 2017. Investing in National Societies to Strengthen Local Action for a Global Response to Crisis. <http://media.ifrc.org/ifrc/wp-content/uploads/sites/5/2017/12/NSIA-Description.pdf>

IFRC, no date. Myanmar Red Cross Society: A journey towards effective cost recovery. <http://media.ifrc.org/ifrc/document/myanmar-red-cross-society-journey-towards-effective-cost-recovery/>

ILO, 2016. Purchasing Practices and Working Conditions in Global Supply Chains. http://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---travail/documents/publication/wcms_556336.pdf

L2GP, 2016. Funding to national and local humanitarian actors in Syria: Between sub-contracting and partnerships. https://www.local2global.info/wp-content/uploads/L2GP_funding_Syria_May_2016.pdf

L2GP, 2017. Can Grand Bargain signatories reach the 25% target by 2020? https://www.local2global.info/wp-content/uploads/L2GP_GrandBargainSignatories_commitment_ExeSum_FINAL.pdf

Mango, 2010. The Challenge of Core Costs. <https://www.mango.org.uk/Pool/G-Managing-overhead-costs.pdf>

NEAR, 2017. Global Policy Brief on a 10% allocation of unrestricted financing to Local/National NGOs as a necessary commitment to local/national organisations capacity strengthening. http://www.near.ngo/imgtemp/downloadfile/A%20Policy%20brief%20on%20Unrestricted%20financing%20support%20to%20Local%20NGOs_1502963481.pdf

Nonprofit Quarterly (NPQ), 2016. Why Funding Overhead Is Not the Real Issue: The Case to Cover Full Costs. <https://nonprofitquarterly.org/2016/01/25/why-funding-overhead-is-not-the-real-issue-the-case-to-cover-full-costs/>

NRC, 2017. Understanding Humanitarian Funds: Going beyond Country-Based Pooled Funds. https://www.nrc.no/globalassets/pdf/reports/pooled_funds_2017_16mar2017_web_v2.pdf

OCHA, 2017. Operational Handbook for Country-based Pooled Funds. http://www.unocha.org/sites/unocha/files/Operational_Handbook_for_OCHA_CBPFs_Version1.2.pdf

OCHA (database), CBPF Grant Management Systems (GMS)- Business Intelligence. <https://gms.unocha.org/content/cbpf-contributions>

P2P Support Team, 2017. GAZINTEP- Supporting principled local action in humanitarian response- GAZINTEP.

UNICEF, 2015. Reference Doc 3: Budgeting, Implementation and Financial Reporting. https://www.unicef.org/about/partnerships/files/Reference_Document_3.docx

USAID. Indirect Cost Rate Guide for Non-Profit, Organizations. <https://www.usaid.gov/work-usaid/resources-for-partners/indirect-cost-rate-guide-non-profit-organizations>

WFP. Partner with us: Non-governmental organizations. <https://www.wfp.org/partners/non-governmental-organizations/partner-with-us>

Annex 2 – Contributing Stakeholders

Amanda Schweitzer, Emergency Capacity Strengthening Coordinator, CRS
Andrew Rizk, Director Finance and Administration, IFRC
Anne Street, Head of Humanitarian Policy, CAFOD
Anita Kattakuzhy, Humanitarian Policy Adviser, Oxfam
Anthony Nolan, Consultant (Localisation in Coordination), UNICEF
Brigitte Mukengeshayi, ECHO
Kathy Relleen Evans, Coordination Hard to Reach Ambition, Norwegian Refugee Council
Christian Els, Independent consultant, working for Trocaire
Michael Ahrens, Deputy Head of the Division for Humanitarian Assistance, German Federal Foreign Office
Dr. Ahmad Faizal Mohd Perdaus, President, MERCY Malaysia
Elena Garagorri, Senior Advisor on Donor Relations, ICRC
Fatima Sherif, Senior Humanitarian Manager, UNHCR
Frederique Lehoux, Humanitarian Partnership Coordinator, Care International
Jennifer Poidatz, Vice President Humanitarian Response, CRS
Jette Michelson, Chief Advisor, Danish Ministry of Foreign Affairs
Juan Chaves-Gonzalez, Humanitarian Affairs Officer, OCHA
Marumbo Ngwira, Director Resource Development, World Vision International
Maxwell Sibhensana, Technical Director Program Development, World Vision International
Melissa Daley, Tearfund
Nils Carstensen, Senior Advisor, L2GP & DanChurchAid
Patricia McIlreavy, Vice President Humanitarian Policy and Practice, InterAction
Regina Gujan, Deputy Head Multilateral Affairs Division, SDC
Rolla Hinedi, Head of Gaziantep Office, Syria Relief
Saskia Harmsen, Charter for Change/Change Manager, Oxfam
Seán Ó hAodha, Deputy Director, Irish Aid
Silvia Chiarucci, Programme Specialist, UNICEF
Pat Laberge, Director, Global Programs, Canadian Red Cross
Sarah Clayton-Fisher, DFID Strategic Partnerships Manager, British Red Cross
Saski Harmsen, Change Manager Charter for Change, Oxfam International
Stephen Close, Assistant Director Humanitarian Reform and Performance Section/Humanitarian and Refugee Policy Branch/Humanitarian, NGOs and Partnerships Division, Australian Department of Foreign Affairs and Trade
Tove Myhrman, Programme Manager Specialist/HUMASIEN Humanitarian Unit, SIDA

Annex 3 – About the Consultant

Mr. Raj RANA – Team Leader

Rue Hugo-de-Senger 3, 1205 Geneva, Switzerland

Tel: +41 22 575 4954

Nationality: Swiss/Canadian

Email: raj@thewolfgroup.org

Languages: English, French, German, Russian

As owner of the WolfGroup Consultants and team leader for this consultancy, Raj brings 18 years of international experience with over 150 projects in 40 countries. Graduated as an architect (B.ARCH, M.ARCH), he then made the obvious next steps into a short military career including service as a UN peacekeeper, then as a humanitarian worker in conflict zones with the ICRC and subsequently setting up his own consulting firm.

His focus as a consultant is on evaluating organizations and facilitating initiatives to enhance their strategies, structures, processes, partnerships, and culture. As a Certified Professional Facilitator ([CPF](#)) he brings tools and processes to foster the types of exchanges and reflection and in capturing the rich outcomes of such discussions through graphic recording. He is a practitioner of Social Return on Investment ([SROI](#)), a Certified Sustainability CSR Practitioner ([CSR-P, IEMA](#)) a Certified [GRI G4 Reporter](#) and is a graduate of the University of Cambridge Postgraduate Certificate in Sustainable Business ([PCSB](#)). Raj is Canadian/Swiss and works professionally in English and French.

Country experience: Afghanistan, Armenia, Bangladesh, Bosnia-Herzegovina, Burundi, Cambodia, Croatia, Democratic Republic of Congo (DRC), Egypt, Georgia (including Abkhazia), Guatemala, Haiti, Indonesia, Iraq, Israel (including oPt), Ivory Coast, Jordan, Kenya, Kosovo, Kuwait, Lebanon, Maldives, Malaysia, Mongolia, Mozambique, Nepal, Pakistan, Philippines, Qatar, Republic of Korea, Russian Federation (North Caucasus), Rwanda, Sri Lanka, Sudan, Switzerland, Syria, Thailand, Ukraine, Zambia.

His profile on LinkedIn: <http://www.linkedin.com/in/rajrana>