

# Country-based pooled funds for humanitarian financing

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## Question

***What is the available evidence for the use and efficacy of country based pooled funds in multi-year humanitarian funding as against targeted funding for specific humanitarian emergencies? Based on experience to date, what are considered best practices for governance, management, prioritisation of needs, and accountability of pooled funds?***

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# 1. Summary

Country-based pooled funds (CBPFs) are mechanisms used to receive contributions from multiple financial donors and allocate unearmarked resources to multiple implementing entities within a country (Lattimer and Swithern, 2017, p. 93). Donors use CBPFs to pool their contributions to support local humanitarian efforts.<sup>1</sup> CBPFs are thought to enable the provision of timely, coordinated and principled assistance, and help meet The Grand Bargain commitment to channel by 2020 25% “of humanitarian financing to local and national responders as directly as possible” (2; Thomas, 2017, p. 4; Grand Bargain, 2016, p. 5). In recent years humanitarian CBPFs have grown in number and funding<sup>3</sup> (Thomas, 2017, p. 4). However, the overwhelming majority of global humanitarian funding is provided as direct bilateral grants from donors to recipient organisations.<sup>4</sup> While the volume of unearmarked pooled funds is increasing, it is not growing as a share of the total (Stoddard et al., 2017, p. 13; Urquhart and Tichel, 2018, p. 11).

This rapid review provides a brief overview of the evidence on the effectiveness of CBPFs for humanitarian response, and recommendations of good practice. The review has looked for evidence on all humanitarian CBPFs, which are managed by a range of organisations. This review has focused on country-level funds that are set up to support humanitarian work. Although not covered by this review, there may be relevant learning from 1) other county-based funds focused on non-humanitarian development objectives, and 2) global humanitarian pooled funds.<sup>5</sup> The review also highlights briefly findings on other types of country-based funds – funds that are accessible to multiple organisations, but with financing from only one donor (Thomas, 2017).

The review is limited to English language material and the most recent literature (published within the last four years). The evidence found is from a mix of reports published by organisations (donors and NGOs) implementing or participating in CBPFs, and some (albeit) limited comparative analysis.<sup>6</sup> While the review includes findings from some individual CBPF evaluations, given the rapid nature of this review, there was not time to go through all individual fund data. The available evidence is overwhelmingly on UN CBPFs.<sup>7</sup> There is some exploration of gender issues in some of the material, but no mention of disability.

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<sup>1</sup> Accessed 18 November 2018. <https://www.unocha.org/our-work/humanitarian-financing/country-based-pooled-funds-cbpf>

<sup>2</sup> Accessed 18 November 2018. <https://www.unocha.org/our-work/humanitarian-financing/country-based-pooled-funds-cbpf>

<sup>3</sup> Funding channelled through UN-managed pooled funds almost doubled over the past decade, reaching US\$1.2 billion in 2016 – including the global CERF as well as CBPFs (Lattimer and Swithern, 2017, p. 9). This grew to a record total of US\$1.3 billion in 2017 (Urquhart and Tichel, 2018, p. 11).

<sup>4</sup> Reportedly accounting for 90% of 2015-2016 global humanitarian response according to OCHA data (Stoddard et al., 2017, p 13).

<sup>5</sup> Such as the UN Central Emergency Response Fund and the non-governmental organisation (NGO)-managed START Fund

<sup>6</sup> There appears to be little in-depth comparative analysis of different humanitarian funding modalities or comparative study of humanitarian CBPFs as a whole, across the range of management organisations. Key studies are Stoddard et al. (2017) that looks at efficiency and inefficiency in humanitarian financing and a mapping and review of humanitarian pooled funds by Thomas (2017). Forthcoming studies that will update and strengthen the evidence base include: the global evaluation of UN CBPFs (under way 2018) and the assessment of the state of the humanitarian system by ALNAP (under way 2018).

<sup>7</sup> Including from a global evaluation of CHFs (Hidalgo et al., 2015) and ERFs (Thompson et al., 2013); MOPAN (2017) assessment of OCHA; donor evaluations of their use of UN CBPFs (e.g. Sida – Mowjee et al., 2016; WFP – Maunder et al., 2014); and a study on how UN CBPFs can support national NGO capacity building (Montemurro, 2017).

## Key findings

### *Use and efficacy of country based pooled funds in multi-year humanitarian funding compared to targeted funding for specific humanitarian emergencies:*

- **Type of CBPFs:** The UN manages most CBPFs (with currently 18 UN CBPFs that received USD 832 million in 2017, and individual fund size from USD 7–140 million). The EU has a couple of country-based trust funds that link humanitarian relief, rehabilitation and development. There are also reportedly a growing number of CBPFs managed by NGOs such as the Start Fund, but information is scarce and exact numbers not found.
- **Overall:** UN CBPFs are a valuable mechanism to enable response to local emergency needs which have been improving, becoming reasonably efficient, effective funding mechanisms (MOPAN, 2017; Stoddard et al., 2018). However, allocative efficiencies (strategic coordination and ground-level decision-making) can be outstripped delays in approval process and heavy transaction costs – that are typically borne by the smallest NGOs for the least reward (Stoddard et al., 2017, p. 2). Poor broader humanitarian coordination in a country can hinder CBPFs (Stoddard et al., 2017, pp. 24-25).
- **Multi-year funding:** While CBPFs are flagged as having a role to play in achieving multi-year predictable humanitarian financing, there are few reported instances of CBPF multi-year funding. Some donors provide multi-year funding to CBPFs – enabling more innovative and strategic work – and a few CBPFs provide two or three year funding to recipients. However, most UN CBPF funding has had an annual decision process, with no guarantee of follow-on funding (Hidalgo et al., 2015, p.vi). Reportedly, the UN CBPF system requires adjustments to be able to manage longer-term interventions<sup>8</sup>.
- **Prioritising resources:** the CBPF model can enforce field-level priority setting (across agencies and sectors), giving greater confidence “resources will be spent on the highest and most urgent priorities, delivered by the most well-positioned actor” (Konyndyk, 2018, p. 11). There are however some reports of donors colluding with CBPF managers to influence priorities. Moreover, as a small(er) proportion of the funding pool, CBPFs are arguably less able to leverage comparative advantage (Stoddard et al., 2017, p. x).
- **Localisation:** CBPFs allocating directly to local NGOs can help donors achieve localisation objectives (Stoddard et al., 2018). UN CBPFs providing strategic, long-term support have enabled national partners to engage more meaningfully (United Nations Office for the Coordination of Humanitarian Affairs (OCHA), 2015b; Montemurro, 2017, pp. 3-4). When a national fund is open to international-NGOs (INGOs) and national-NGOs (NNGOs) there is a concern NNGOs are disadvantaged: however, opening a special NNGO window can involve challenges (Stoddard et al., 2017, p. 26). CBPF overhead to NNGOs enables longer-term planning (Grisgraber, 2017, p. 5).
- **Technical efficiency:** UN CBPFs have been criticised for being slow with cumbersome bureaucratic processes with high transaction costs for local organisations (Stoianova, 2014; Mowjee et al., 2016, p. 32; Stoddard et al., 2017, p. 25). There have been improvements over time (with on average, pooled funds twice as quick as bilateral grants from the proposal to decision stage) but ultimately they remain constrained by inflexible

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<sup>8</sup> Accessed 14 November 2018. <https://phap.org/thematic-notes/2016/02/humanitarian-pooled-funding-ngos-follow-questions>

UN Secretariat and UNDP administrative systems (MOPAN, 2017). NGO funds show a quick turn-around is possible (e.g. Pakistan RAPID Fund) (Thomas (2017, p. 20).

- **Flexibility:** UN CBPFs “are typically too tightly circumscribed in their role” to respond to changing needs, and are not particularly flexible to midstream modifications (Stoddard et al., 2017, p. 32). The Bêkou Trust Fund for the Central African Republic (CAR) is cited a useful example of built-in flexibility through direct awards of grants via expression of interest and direct negotiations with the fund manager (NRC et al., 2017, p. 30).
- **Risk management:** OCHA increased the share of CBPF funding to national and local NGOs partly due to improved risk management (Montemurro, 2017, pp. 3-4). Many local partners do not qualify to receive direct CBPF funding, and require direct oversight by CBPF implementing partners – stretching the latter’s capacity (Rackley, 2015, p. 8). Partner Capacity Assessments (PCAs) can be demanding processes leading to high transaction costs for many NNGOs, affecting accessibility (Lewinsky, 2015).
- **Coherence:** In the past, coherence between humanitarian CBPFs and other funds has been weak, with minimal linkages with other development work, but a 2017 review found positive examples of UN CBPFs supporting coherence within their overall suite of country-level response mechanisms (Hidalgo et al., 2015, p. 10; MOPAN, 2017, p. 31).
- **Cost effectiveness:** Donors assumed older UN CBPFs (the Common Humanitarian Funds) were less cost-effective than funding UN agency programmes directly through bilateral programmes (Hidalgo et al., 2015, p. 24). A review of EU CBPFs could not establish they were more cost-effective than EU regular external-funding instruments (Carrera et al., 2018, p. 9). (This rapid review did not find data on CBPF value for money; this may be available in individual fund evaluations.)
- **Cross-cutting:** CBPF guidelines cover gender mainstreaming and accountability to affected populations (MOPAN, 2017, p. 73) but do not mention disability<sup>9</sup>. While UN CBPFs use a gender marker and usually have a gender focal point, most do not monitor how projects have addressed gender concerns (Mowjee et al., 2016, p. 46).

### ***Best practices for CBPFs:***

- **Prioritise needs through a strategic, multi-year approach** building on CBPF complementarity and coherence with other humanitarian financing and across the development spectrum.
- **Support national and local NGOs** involvement in co-creation of funds and invest in building and strengthening national and local capacities.
- **Draw on existing expertise and experience**, ensuring the governance structure is based on clear systems of authority, accountability and transparency.
- **Make CBPFs technically efficient**, ensuring requirements (that incur transaction costs and affect timeliness of response) commensurate with the size and timelines of the grants, maximising flexibility to react to changing conditions.
- **Promote a culture of risk management, rather than risk avoidance** with a harmonised, light-touch, transparent, accessible and proactive approach to PCAs, and invest in building local NGO risk and financial management capabilities.

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<sup>9</sup> This rapid review checked the Operational Handbook but has not gone through the annexes to the Handbook.

- **Ensure transparent and accessible** information and tools – to generate trust, collaboration and inclusivity.
- Include guidelines, support and monitoring for fund applicants to address **1) accountability to affected populations, 2) gender, 3) disability and 4) the impact of humanitarian action on the local environment** within their work.

## 2. Types of country-based pooled funds<sup>10</sup>

There are currently 18 **UN CBPFs** which received USD 832 million in 2017.<sup>11</sup> Previous iterations of UN CBPFs include the Emergency Response Funds (ERFs) – established in 1997 to provide rapid and flexible funding for unforeseen, sudden-onset humanitarian emergencies – and the Common Humanitarian Funds (CHFs) – established 2006 to allocate resources against consolidated appeals<sup>12</sup> (OCHA, 2015b; Maunder et al., 2014; pp. i-ii).

In 2015, OCHA unified its practice on the UN CBPFs – issuing mandatory minimum standards through a Policy Instruction and Operational Handbook. Some UN CBPFs developed their own guidance building on the Handbook, while others refer to the global version (Thomas, 2017, p. 10). In October 2017 a revised version of the handbook was published, following consultation with fund managers and other stakeholders. Another round of revisions were planned to start in 2018 to “introduce major changes to the current business process stemming from commitments made at the World Humanitarian Summit and in line with the Grand Bargain”.<sup>13</sup>

For many of the UN CBPFs, the managing agent is OCHA. For some former CHFs (including in CAR, the Democratic Republic of Congo (DRC), South Sudan and Sudan) the managing agent is UNDP and the administrative agent is the UNDP Multi Partner Trust Fund (MPTF) Office (OCHA, 2015b; Hidalgo et al., 2015, p. iv). This office manages around 100 funds, including other development-focused national multi-donor trust funds and stand-alone UN Joint Programmes, as well as the humanitarian CBPFs (Thomas, 2017, p. 22).

Since 2013, the EU has managed CBPFs – termed **EU Trust Funds** (EUTFs) – that link humanitarian relief, rehabilitation and development, and are set up outside the EU budget (Thomas, 2017, p. 24). There are few EUTFs and they are all unique in how they are managed (Thomas, 2017). This rapid desk review found little data on them online and no publicly available evaluations of their operations. Thomas’ 2017 mapping lists two country-based EUTFs (the Bêkou Trust Fund in CAR — and a fund in Colombia), and another two regional funds.

<sup>10</sup> This section draws on a 2017 mapping of CBPFs for the Norwegian Refugee Council (Thomas, 2017).

<sup>11</sup> From the first UN CBPF set up in 1997 in Angola, donors have contributed over \$6 billion to 27 UN CBPFs since then (OCHA, 2018, p. 2). In 2017 the top ten largest UN CBPFs are: Yemen (USD 140m); Turkey (USD 95m); South Sudan (USD 64m); Ethiopia (USD 63m); DRC (USD 40m); Sudan (USD 40m); Iraq (USD 39m); Somalia (USD 35m); Syria (USD 36m); oPt (USD 25m); Afghanistan (USD 24m); CAR (USD 21m); Nigeria (USD 20m); Myanmar (USD 14m); Jordan (USD 7.6m); and Lebanon (USD 7.4m). The top ten donors are: UK; Sweden; the Netherlands; Germany; Belgium; Ireland; Norway; United States; Denmark; Saudi Arabia. Accessed 12 November 2018. <https://www.unocha.org/our-work/humanitarian-financing/country-based-pooled-funds-cbpf>

<sup>12</sup> Both providing unearmarked funding at country level, the ERF dispersed less than US\$10 million per country per year, with smaller grant sizes (less than US\$500 000) than the CHF which had an annual fund size of around US\$50–120 million per country and grants (Maunder et al., p. ii).

<sup>13</sup> Accessed 18 November 2018. <https://www.unocha.org/our-work/humanitarian-financing/country-based-pooled-funds-cbpf/cbpf-guidelines>

There are also **NGO-managed CBPFs**. This review has not found a comprehensive mapping of these but Thomas (2017) provides some examples. One prominent case is the £10 million Start Fund Bangladesh, designed to enable aid agencies to respond early and fast to under-the-radar emergencies. The fund was set up in 2017 by the Start Network with funding from the UK government, as a pilot for the Start Network’s intention to move to decentralised national and regional hubs. Start Fund Bangladesh is expected to extend to a growing number of NNGOs during its initial four-year life span, ultimately becoming an independent local fund (Patel and Van Brabant, 2017, p. 24; Thomas, 2017)<sup>14</sup>. As of September 2018, Start Fund Bangladesh has addressed seven small/medium emergencies, reaching around 0.2 million people through awarding more than £2.16 million to 14 of its member agencies and their partners.<sup>15</sup> Another example of a NGO-managed CBPF is the Responding to Pakistan’s Internally Displaced (RAPID) Fund established in 2009 by Concern Worldwide and USAID to provide rapid access to NGOs – and particularly NNGOs – to address gaps and overlooked needs. The second phase ran 2013-2016, with grants from USD 5,000–300,000.

### 3. Effectiveness of country based pooled funds

Recent reviews find UN CBPFs have improved year on year, “becoming reasonably efficient and effective funding mechanisms” and provide “a valuable mechanism to enable responses to local needs in emergencies” (Stoddard et al., 2017, p. 24<sup>16</sup>; MOPAN, 2017, p. 17).

However, Stoddard et al. (2017, p. 2) highlighted that while pooled fund grants were decided more quickly than grants from bilateral donors<sup>17</sup>, CBPF allocative efficiencies (strategic coordination and ground-level decision-making) can be outstripped by technical inefficiencies. These include delays at with the approval process and heavy transaction costs typically borne by the smallest NGOs for the smallest and shortest-duration grants (Stoddard et al., 2017, p. 2). When interviewed in 2016 the Oxfam Humanitarian Funding Manager<sup>18</sup> reported that three main questions for NGOs on “the UN-led pooled funds system” were: “how to make it more accessible for those that are best placed to respond, how to make it more flexible, and how to make it more timely”.<sup>19</sup>

CBPFs’ performance is linked to the quality of the coordinated humanitarian structures in each country: “Poor humanitarian coordination in a country can hinder CBPFs, but conversely, well-run

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<sup>14</sup> Accessed 18 November 2018. <https://reliefweb.int/report/bangladesh/new-bangladesh-emergency-fund-will-enable-rapid-response-humanitarian-crises>

<sup>15</sup> Accessed 18 November 2018. <https://startnetwork.org/start-fund/bangladesh>

<sup>16</sup> This study by Humanitarian Outcomes looked at efficiency and inefficiency in humanitarian financing. It compared the technical and allocative efficiency of the main humanitarian funding modalities (public and private direct grants and global and country-level pooled funding mechanisms). This was an extensive quantitative and qualitative study that looked at global data, and undertook an extensive literature review and three case studies (including field trips): Ethiopia (2016), Iraq (2016), and Myanmar (2015 floods). (Stoddard et al., 2017)

<sup>17</sup> Stoddard et al. (2017) found that, albeit with variations by donor, overall the direct granting modality provides larger and relatively predictable contributions, with high transaction costs for some donors’ grants balanced by (larger) size of the grants. However, compared to the other funding modalities, “direct grants are slower and tending to be channelled through larger channels, regardless of whether this is the most direct and efficient way for funding to reach the actor best placed to implement” (Stoddard et al. 2017, p. 14).

<sup>18</sup> Oxfam is represented at the Pooled Fund Working Group and co-chairs the NGO Dialogue Platform on Country-Based Pooled Funds

<sup>19</sup> Accessed 13 November 2018. <https://phap.org/thematic-notes/2017/07/ngos-engagement-pooled-funds-interview-ben-garbutt>

and well applied CBPF can help to strengthen coordination structures by incentivizing actors and underpinning a strategic plan". In Ethiopia, "the CBPF provides an efficiency benefit at the strategic, system level. This was not the case in Iraq, where difficulties are rooted in broader coordination failure" (Stoddard et al., 2017, pp. 24-25).

## Multi-year funding

CBPFs have a potential role to play in achieving multi-year predictable humanitarian financing<sup>20</sup> (NRC et al., 2017, p. 30). Yet instances of CBPF multi-year funding remain rare, with apparently little systematic evaluation of their effects. Development Initiatives (2015, p. 3) found that while many UN-coordinated Strategic Response Plans (SRPs) are now set out over two- or three-year periods, multi-year funding from donors is lagging behind, with the majority still continuing with funding cycles of 12–18 months.

However, some donors – such as DFID, Sida – are providing multi-year funding to CBPFs (Hidalgo et al., 2015, p. vi). According to DFID's 2014 Annual Review of the Ethiopia HRF, the HRF Unit claim that they could be more innovative, creative and strategic, with more predictable sources of funding. (DFID, 2014, p. 18).

Over the years, UN CBPFs have funded small projects across numerous sectors through an annual decision process, with no guarantee of follow-on funding (Hidalgo et al., 2015, p.vi). OCHA's 2014 vision paper states that "CBPFs will offer opportunities for multi-annual funding, in alignment with multi-year SRPs, allowing for better planning and longer-term engagement"<sup>21</sup> (OCHA, 2014, p. 3). However, the UN CBPF Policy Instruction and Operational Handbook do not mention multi-annual funding. The Operational Handbook states that "Projects funded through reserve allocation should be implemented within a maximum of 12 months. Exceptions to this timeframe can be made by the HC [Humanitarian Coordinator] based on prevailing circumstances" (OCHA, 2017, p. 22). Reportedly the maximum duration of 12 months was to match the timeframe of most Humanitarian Response Plans but "this may change in the future with changes to the system's ability to plan, monitor and fund longer-term interventions".<sup>22</sup>

According to NRC et al. (2017), the DRC CBPF has been providing two-year funding agreements for a number of years. However, the study highlights that "the realities of the wider funding context challenge the operational value of its multi-year aspirations". Decreasing funds led to a shift in the balance between the standard allocation and reserve allocation windows, with the availability of funds for multi-year programming through the standard allocation window "very small considering the magnitude of the demand" (NRC et al., 2017, p. 30).

The Bêkou Trust Fund is able to issue contracts of up to three years in duration (NRC et al., 2017, p. 30).

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<sup>20</sup> The available qualitative and quantitative evidence (albeit limited and in some cases very context specific) indicates multi-year humanitarian funding can result in cost efficiencies throughout the disaster management cycle, delivering cost effectiveness in terms of outcomes as well as facilitating interventions with longer term impacts (Cabot Venton, 2013, p. 3).

<sup>21</sup> In the past CHF's reportedly only gave NGOs a maximum of 7 months to implement the CHF-funded project, while ERF allocations tended to be for only 6 months (Cabot Venton, 2013, p. 39).

<sup>22</sup> Accessed 14 November 2018. <https://phap.org/thematic-notes/2016/02/humanitarian-pooled-funding-ngos-follow-questions>

## Prioritising resources

Konyndyk (2018, p. 11) finds that the CBPF model – where the humanitarian coordinator and an advisory board that includes donor and agency representatives decide funding allocations independent of agency mandates – realigns incentives by forcing field-level priority setting (across agencies and sectors) based on a comprehensive view of needs. This means agencies (UN or NGO) must make the case for funding based on ground-level determinations of priorities and delivery capacity (rather than global mandates or sector prerogatives). This can give a donor greater confidence that “their resources will be spent on the highest and most urgent priorities, delivered by the most well-positioned actor” (Konyndyk, 2018, p. 11).

However, Stoddard et al. (2017, p. 27) reported “agencies have complained of donors colluding with the managers of the pooled funds to incentivize actors to change tack and work in areas that they deem underserved—perceived as gainsaying the agencies’ judgement on where and how to program” (Stoddard et al., 2017, p. 27). Moreover, “As bilateral grants led the surge in funding over the past few years, however, pooled funds are becoming a smaller and smaller percentage of the total funding pool and arguably less relevant and less able to leverage comparative advantage and add value as part of a diverse “funding ecosystem”” (Stoddard et al., 2017, p. x).

## Localisation and inclusivity

Stoddard et al. (2017, p. 3) found “country-based pooled funds, where they are functioning well and allocating directly to local NGOs, may be a means for some donors to achieve subsidiarity and localization objectives while avoiding the trade-off inefficiencies of managing numerous small grants to local entities”. UN CBPFs have started to preferentially fund NGOs, particularly NNGOs, when possible and efficient/effective to do so<sup>23</sup> (Stoddard et al., 2017, p. 17).

Issues highlighted in the literature on effective localisation through CBPFs are:

- **CBPF support with a strategic and long-term remit is important to enable national partners to engage more meaningfully** (OCHA, 2015b; Montemurro, 2017, pp. 3-4). Thomas (2017, p. 13) found the CBPF NGO Dialogue Platform (created in 2014) and NGO participation in the Pooled Fund Working group has helped greater dialogue between OCHA and NGOs. Poole (2018, p. 15) notes that “an unanticipated by-product” has been the opportunities for CSOs to take part in the decision-making of the OCHA managed CBPFs, through participatory governance structures. In South Sudan, in 2015-16, OCHA supported NNGOs to better understand and engage with the humanitarian coordination system, including several briefings and orientation sessions on the Humanitarian Fund (HF) (Montemurro, 2017, pp. 5-6). Local groups in Syria also reported ‘worthwhile’ training from OCHA as part of the HF application and award processes. However, many Syrian groups also wanted longer, more programme-specific support (e.g. through mentoring on challenges such as effective advocacy and

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<sup>23</sup> Volumes of CBPF funding to NGOs and their share of total allocations increased from US\$196 million (51% of the total) in 2014 to US\$412 million (61%) in 2016 to USD 432 million (67%) in 2017 (Lattimer and Swithern, 2017, p. 78; Urquhart and Tuchel, 2018, p. 49). International NGOs (INGOs) received the largest share of CBPF allocations to NGOs (67%), with 30% provided to national or local NGOs and 3% to southern INGOs (Urquhart and Tuchel, 2018, p. 49). A 2017 ICVA briefing reported that in 2015 the CBPF disbursements allocated to NNGOs represented more than half of the amount of tracked funds received directly by NNGOs (ICVA, 2017, p. 2).

efficient information management in the current context) rather than “just a workshop or two” (Grisgraber, 2017, p. 5).

- **When a national fund is open to both INGOs and NNGOs there is a concern that NNGOs are disadvantaged** (e.g. by not being able to meet the same standard of high quality proposals, written in English). Ideas proposed for the National Start Fund in Bangladesh include reserving some of the national fund for NNGOs; governance safeguards to ensure decision-making and response leans towards NNGOs; and starting with INGO involvement – to provide legitimacy and take on risk – but phasing to local/NNGOs to become wholly national over time (Patel and Van Brabent, 2017, p. 25). The experience of the Iraq Humanitarian Fund (IHF) in opening a special window for NNGOs demonstrates the challenges involved. At the global level, understanding is that contributions to a pooled fund are as standard not earmarked; running contrary to this meant that the IHF’s NNGO earmarked contributions were “the subject of lengthy negotiations with OCHA and inefficient on the supply side” (Stoddard et al., 2017, p. 26).
- In Syria and Somalia local NGOs reported **appreciation of the UN CBPF overhead policy**, which allows them to use a small percentage of the allocation for overheads<sup>24</sup> (a first for many NNGOs) (Grisgraber, 2017, p. 5). As a result, the Syrian groups were able to plan longer-term projects and reduce their dependency on larger partner funding decisions (Grisgraber, 2017, p. 5).
- **Transparency could be improved.** There is limited information sharing between CBPFs, and no repository of good practice to guide the creation of new funds (Thomas, 2017, p. 32). Even for individual UN CBPFs, information – on guidance, application procedures, governance, annual reports, complaints mechanisms, or contact information – can be spread over different websites (Thomas, 2017, p. 13). For the EUTFs, finding information related to the application process, what the funding criteria are and what kind of reporting may be required, is challenging (Thomas, 2017, p. 24). Furthermore, each EUTF is developing its own results-monitoring framework, with different systems, apps and websites (Carrera et al., 2018, p. 10).

## Technical efficiency – timeliness, transaction costs

UN CBPFs have been criticised for slow processing of applications and fund disbursements (Stoianova, 2014; Mowjee et al., 2016, p. 32). OCHA disbursement for CBPFs were 34% in 2015 against a target of 85% (MOPAN, 2017, p. 14). Other bureaucratic issues affecting fund availability include:

- CBPF funding cycles (aligned with donor administrative years) impacting on the CBPF’s ability to respond to predictable needs (e.g. the Ethiopian seasonal calendar) (Stoddard et al., 2017, p. 26);
- Long delays in auditing CBPF funded projects leaving a significant number of local groups unable to apply for more funding (cited by Syrian NGOs) (Grisgraber, 2017, p. 6).
- Limited accessibility for local NGOs (e.g. online applications in English required by the Myanmar Humanitarian Fund) (Stoddard et al., 2017, p. 25).

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<sup>24</sup> UN CBPF overhead policy “offers equal treatment to international/national and local actors. Maximum of 7% of direct expenditures, non-earmarked” (Rana, 2017, p. 7).

Stoddard et al. (2017, p. 25) found while UN CBPFs have variable performance on rapidity of funding, they typically improve over time. On average, pooled funds were twice as quick as bilateral grants from proposal to decision stage, but disbursement approvals were slow at times.

However, MOPAN (2017, p. 14, 18, 77) concluded, that while efforts have been made to address disbursement rates, ultimately UN Secretariat and UNDP administrative systems can limit flexibility and lead to bureaucratic delays, and challenge NGO accessibility. OCHA Funding Coordination Section and ICVA (2015) provides a summary of NGO challenges to accessing country-based pooled funds. This analysis was intended to inform and improve the new CBPF guidelines. However, Thomas (2017, p. 32) found almost two years after publication, UN CBPF guidelines were still not fully understood by everyone. Thomas (2017, p. 32) suggested simplifying to ensure wider adoption and avoid unnecessary complications being added at the country level.

UN CBPFs grants have tended to be smaller, on average, than bilateral or global pooled fund grants, in part due to their objective of funding smaller crises and smaller local organisations when best suited to respond (Stoddard et al., 2017, p. 25). Stoddard et al. (2017, p. 26) pointed out that “the smaller the grant, the larger the relative transaction costs, which are all the same in the CBPF system no matter the amount of the grant”, meaning that “the smallest NGOs typically bear the greatest administrative burden for the least reward”.

There have been experiments with UN CBPF rapid response windows (e.g. to disburse funds within 24 hours) (Mowjee et al., 2016, p. 32). The Ethiopia CBPF pre-positioned small amounts of funding (around USD 20,000) with agencies to allow immediate response to crises based on a phone call or email approval (Stoddard et al., 2017, p. 25). This reportedly had a substantial impact in the first hours and days of a crisis for a relatively small amount of money, but was decided to be “too high a corporate risk” to continue (Stoddard et al., 2017, p. 25).

Meanwhile several NGO funds achieve a quick turn-around. Thomas (2017, p. 20) reports the Pakistan RAPID Fund had clear procedures and a relatively short time line for decision-making (approximately two weeks from receipt of application to final approval). Development Initiatives (2015, p. 8) recommended investing in “NGO-led pooled funds that provide innovation and complementarity to those led by multilaterals in terms of focus, agility and balance of recipients”.

## **Flexibility**

Stoddard et al. (2017, p. 32) found UN CBPFs tend to be “too tightly circumscribed in their role” to respond to changing needs, despite aspirations. NGOs reported that changes of more than 15% of project budgets required the approval of the Humanitarian Coordinator, a process which can take some time to finalise. However, recent improvements in the UN CBPF guidelines (budget and template structure) have reduced the need for changes (ICVA, 2017).

NRC et al. (2017) reported that “the Bêkou Trust Fund for the CAR “provides a useful example of a transitional mechanism working on recovery priorities with flexibility built in from the design stage”. It provides flexibility through direct awards of grants: there is no need to call for proposals (expressions of interest are welcomed). Once an NGO is pre-selected based on the expressions of interest, they can enter into direct negotiation with the fund manager. The Fund apparently has greater flexibility and speed than funds contracted directly from the European Development Fund (NRC et al., 2017, p. 30). However, the average funding cycle is only 5-6 months and there is a preference for providing bigger grants, favouring international organisations, like UN agencies.

## Risk management

MOPAN (2017) praised the rigour of OCHA financial management systems (with clear, public criteria for fund allocations), while noting this entails constraints. Montemurro (2017, pp. 3-4) found OCHA was able to increase the share of CBPF funding to national and local NGOs as a result – among others – of improved risk management in the field and at headquarters, including the implementation of much more robust accountability frameworks and risk management systems on the ground. Donors have worked with OCHA to strengthen CBPF risk management systems, including through external validation exercises such as commissioned by Sida following corruption cases in the Somalia and DRC CBPFs (Mowjee et al., 2016, p. 49).

Rackley (2015, p. 8) found most local partners do not qualify to receive direct CBPF funding<sup>25</sup> due to a lack of strong financial management and reporting systems. They require direct oversight by CBPF implementing partners, which can stretch CBPF partners' capacity "to the point of vulnerability".

A review of PCAs found they can be demanding, lengthy, opaque processes, often preceded by extensive due diligence requirements and risk assessments, leading to high transaction costs and barriers of entry for many NNGOs (Lewinsky, 2015). NGOs have raised the need to improve the structure and provision of PCA feedback to NGOs (ICVA, 2017).

## Coherence and complementarity

The 2015 global evaluation found coherence between CHF allocation priorities and other development multi-donor funds was weak, rarely extending beyond linkages in project outcomes (Hidalgo et al., 2015, p. 10). MOPAN (2017, p. 31) reported that ERFs made only minimal contributions to resilience and disaster preparedness, but there was some progress in integrating components of resilience programming in humanitarian responses within CHF funds. Reviewing three evaluations of UN CBPFs, Mopan (2017, p. 31) found all three concluded each CBPF "functions well as part of an overall suite of response mechanisms at the country level, and supports coherence".

The EU Bêkou Fund is seen as a positive example for trying to ensure: (NRC et al., 2017, p. 30)

- Complementarity between the EU Fund and the UN CBPF in CAR.
- Bridging humanitarian and development needs, through attracting contributions from both humanitarian and development donors, and from a variety of EU development and migration budget lines and funds and humanitarian funds from ECHO.
- Coherence across funding streams with ECHO on the operational committee and consulted in funding allocation decisions.
- Alignment with strategic national priorities with CAR government on the trust fund board.

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<sup>25</sup> The results of capacity assessments and monitoring measures have meant a decrease in the number of national and local partners in a couple of instances. In Somalia the Humanitarian Fund went from 74 national partners between 2010 and 2013 to 38 in 2014 and 37 in 2016, but increased to 60 by mid-2017. (Montemurro, 2017, p. 4)

## Cost-effectiveness

In the past, there has been an assumption on behalf of donors that older UN CBPFs (the CHFs) are less cost-effective with high transaction costs compared with funding UN agency programmes directly through bilateral programmes (Hidalgo et al., 2015, p. 24).

A review of EUTFs found that “Despite the European Commission’s readiness to use all existing flexibilities in management of the EUTFs, it could not be established that the EUTFs carry out implementation more quickly than the EU’s regular external-funding instruments. The delegated cooperation comes in principle with rather high overall management costs; hence, it is not apparent *prima facie* that EUTFs are more cost-effective.” (Carrera et al., 2018, p. 9).

This review found little assessment of CBPF value for money. OCHA strategic review indicators do not mention value for money; cost effectiveness is one of the criteria (OCHA, 2017, p. 19).

## Cross-cutting issues

CBPF guidelines have sections on gender mainstreaming and accountability to affected populations, though not environmental sustainability and climate change (MOPAN, 2017, p. 73). Furthermore, UN CBPF guidelines do not mention disability. Other findings for CBPFs include:

- Partners are asked to describe in project proposals how affected populations and specific beneficiaries will be involved throughout the project cycle, while CBPF reporting and monitoring procedures seek to verify how this has been applied during implementation. CBPFs are required to establish a formal complaint mechanism to receive feedback from stakeholders who believe they have been treated incorrectly or unfairly during any of the Fund’s processes. (OCHA 2017, p. 49) This rapid review has found no information on the effectiveness of this approach to accountability to affected populations.
- While CBPFs use a gender marker and usually have a gender focal point to verify the scoring in proposals, most do not report on how projects have addressed gender concerns. Afghanistan and Somalia looked at gender challenges and gender monitoring in their 2014 annual reports (Mowjee et al., 2016, p. 46).
- The Afghanistan CBPF has introduced an Environment Marker, making it mandatory for all applicants to consider the impact of humanitarian action on the local environment and develop tailored mitigation strategies (Mowjee et al., 2016, p. 48).

## 4. Good practice and recommendations

These recommendations are drawn from the literature reviewed. In addition there is detailed instruction in the OCHA global guidelines for CBPFs – which is not summarised here as it is set out clearly in the OCHA revised operational handbook and annexes.<sup>26</sup>

### ***Prioritisation of needs***

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<sup>26</sup> Accessed 21 November. <https://www.unocha.org/our-work/humanitarian-financing/country-based-pooled-funds-cbpf/cbpf-guidelines>

- **Undertake a comprehensive needs assessment** to identify needs and priorities for a new fund; avoid duplicating existing instruments; and help build an effective division of labour among donors (European Court of Auditors, 2017, p. 14).
- **Consider how the CBPF fits with the overall country and donor portfolio** – maintaining the widest possible range of options and tools to employ for different needs. Stoddard et al. (2017, p. 3) sets out possible scenarios and financing modalities.
- **Support strategic multi-year funding** in line with moves towards multi-year SRPs, to support increased predictability, better planning, greater flexibility and responsiveness, lower operational costs, as outlined by the Good Humanitarian Donorship principles<sup>27</sup> (Hidalgo et al., 2015, p. x; Thomas, 2017, p. 33; NRC et al., 2017).
- **Build on CBPF complementarity and coherence:** with governments' strategic priorities; between the various humanitarian funds and other financing; across humanitarian and development funding; across donors and their various funding modalities (Thomas, 2017, p. 31).

### **Support national and local NGOs**

- **Involve NNGOs early on in co-creation and co-design.** This creates a strong sense of shared ownership and joint responsibility (Patel and Van Brabant, 2017).
- **Invest in building and strengthening national and local capacities.** This involves developing relationships and thinking bigger than just access to funding – how else can NGOs become involved in the CBPF mechanism? Are there seats available on the advisory board at the local level? (ICVA, 2017).
- **Manage the relationship dynamic at work within CBPFs between INGOs and NNGOs.** Independent third parties may be useful to provide a supporting role (Patel and Van Brabant, 2017). Learn from experiences of earmarked national funding windows.
- **Provide an element of unrestricted funding in partnerships with local organisations.** (Grisgraber, 2017)
- **Be transparent – with accessible information and tools – to generate trust, collaboration and inclusivity** (Thomas, 2017, p. 32). Helpful aids include: in-country information sessions; simple graphical illustrations, process overviews and FAQs on a CBPF's website; trainings for national partners (including peer learning and dedicated sessions); providing an Internet connection for partners at the Fund's office; twice-weekly clinics on grant management systems (Thomas, 2017, pp. 27-28, 31; Lewinsky, 2015).

### **Governance**

- **Share information and draw on existing expertise<sup>28</sup>, structures and experience.** For example, new pooled funds could (Thomas, 2017, p. 33; Poole, 2018, p. 28):
  - Consider – and adapt to the actors, requirements and priorities of a given setting – common structural features and functions of CBPFs.<sup>29</sup>

<sup>27</sup> Accessed 14 November 2018. <https://www.ghdinitiative.org/ghd/gns/best-practices.html>

<sup>28</sup> E.g. UN facilitated Pooled Fund Working Group which brings together donors, NGOs and UN agencies Accessed 29 October 2018. <https://reliefweb.int/report/world/about-country-based-pooled-funds-enar>

<sup>29</sup> . Key elements include: 1) Steering Committee/Board (providing strategic oversight and responsibility for risk management); 2) Secretariat (formulate policy direction and guidelines); 3) Managing Agent (for day-to-day

- Consider contracting a management entity experienced in managing pooled funds, instead of creating another secretariat or support unit, which requires significant investments.
- **Establish a common understanding of the CBPF's purpose, priorities and mechanisms to build greater collaboration and cooperation**, as seen with NGO funds, like the Start Fund. Involving stakeholders when setting priorities and establishing mechanisms is an important means of building confidence and trust in the fund and its mechanisms (Thomas, 2017, p. 30).
- **Ensure the governance structure is based on clear systems of authority, accountability and transparency, with a clear division of labour** between different governance entities – in particular between strategic/"custodian" and management functions (Poole, 2018, p. 28). Carrera et al. (2018, pp. 8-9) recommended explicitly excluding implementing organisations from CBPF governing bodies – learning from EUTF experience of having EUTF contributors – the European Commission and Member states – sit on boards and operational committees.
- **Set up a dedicated donor office to ensure consistent governance and management** across the CBPFs managed by the donor, following the example of the UNDP Multi Donor Trust Fund Office (Carrera et al., 2018, p. 10).
- **Establish a formal complaint mechanism for stakeholders** who believe they have been treated incorrectly or unfairly by the CBPF (Thomas, 2017, p. 10).

### **Management**

- **Tackle disproportionate donor requirements and inflexibility that hinders efficiency at all levels.** Initiate internal agency reforms to remediate long delays from initial award to onward contracting and disbursement to partners. (Stoddard et al., 2017, p. 2)
- **Improve the technical efficiency of CBPFs and make CBPF requirements (that incur transaction costs) commensurate with the size and timelines of the grants,** maximising flexibility to react to changing conditions, within limits set by "appropriate accountability controls and pragmatic risk management" (Stoddard et al., 2017, p. 3). Efforts could involve:
  - Adequate planning, with clear time frames, and systems set-up in advance on proposals, decision-making, and disbursements of funds (Thomas, 2017, p. 31);
  - Making the process as light and 'user friendly' as possible – one example is the Start Fund's quick decision-making and disbursal process (Thomas, 2017, p. 30);
  - Having minimum grant thresholds (Stoddard et al., 2017, p. 32);
  - Simplifying PCAs – e.g. by sharing between UN agencies; accepting other donors' assessments; or agreeing on one simplified partner assessment between CBPFs and at least UNHCR, UNICEF, and WFP (Thomas, 2017, pp. 31, 33);
  - Increasing multi-year funding, with built-in modifier systems to allow partners to adapt to changing circumstances without undergoing time-consuming formal modifications, could similarly bolster flexibility and speed. (Stoddard et al., p. 32).

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operations); 4) Technical Review Committee (sector-specific guidance/review of implementing partners' proposals and reports; 5) PCA Agent; 6) Monitoring Agent (Poole, 2018, p. 29).

- Provide “greater “pre-positioned” funding with individual agencies and/or multiagency consortia capable of putting the money to work immediately in the event of a sudden crisis” (Stoddard et al., p. 2).

### ***Risk management***

- **Promote a culture of risk management, rather than risk avoidance** (Poole, 2018).
- **Consider early and midway monitoring to identify risk management issues.** Proactive monitoring of operations (from proposal to allocation to delivery) as opposed to end-of-program evaluations can improve how risk is being handled institutionally and collectively, and provide course corrections (Rackley, 2015, p. 3).
- **Ensure PCAs and due diligence procedures are proportional** to the often smaller scale operations of NNGOs and their less advanced organisational systems (Lewinsky, 2015). Strive for a harmonised, light-touch, transparent, accessible and proactive risk management approach to CBPF PCAs. Emerging good practice available from Pakistan RAPID fund; Partnership Initiative Turkey; EU Bêkou Trust Fund, OCHA Somalia, START – Financial Enablers Philippines (Lewinsky, 2015).
- **Increase funding for risk and financial management capacity training for local NGOs** to further localisation of the aid agenda (Rackley, 2015, p. 3). PCAs provide an opportunity to identify capacity development needs, with CBPF managers engaging in an honest feedback with partners. Feedback may also provide useful insights as to capacity-development trends and needs in each context (Montemurro, 2017, p. 9).
- **Tap into creative ideas of national stakeholders** on how to deal with practical challenges, including ‘due diligence’ and ‘risk’, in ways that fit the context, with national stakeholders taking active responsibility (Patel and Van Brabant, 2017, p. 24).

### ***Cross-cutting issues***

- Include guidelines and support for fund applicants to consider and develop tailored mitigation strategies for **1) accountability to affected populations, 2) gender, 3) disability and 4) the impact of humanitarian action on the local environment** – and monitor implementation (MOPAN, 2017; Mowjee et al; 2016).

## **5. Other humanitarian country-based funds**

There are **other country-based humanitarian financing instruments** that do not fit the standard definition of CBPFs (that is multiple donors to a fund that allocates to multiple entities). Other funding mechanisms include funds that have a single donor. These include “‘umbrella grants’ from a single donor to an individual NGO or NGO consortium – or – as in the case of the DFID fund in Myanmar – to a commercial contractor (Thomas, 2017, p. 9). The receiving entity is legally responsible for the funds and puts in place procedures and systems to manage and disburse the funds (Thomas, 2017, p. 9).

Stoddard et al. (2017, p. 27) find that bilaterally funded instruments involving prearranged partners set up by donors at country (or global level) can be quite technically efficient in terms of speed and limited transaction costs: “When they work well, these consortia and framework agreements are considered the second or third fastest way to mobilize money (after internal reserves and the Start Fund)”. There were occasional NGO feedback that these modalities did not always reduce transaction costs because of the amount of internal discussion required.

One example of this kind of country-based fund is the Humanitarian and Resilience Programme Facility (HARP-F) in Myanmar. With a GBP 60 million budget from 2016-2020 for protracted conflict-related crises and natural disasters<sup>30</sup>, this is the first instance of DFID using a commercial contractor (Crown Agents) to manage a humanitarian financing facility (NRC et al., 2017, p. 31). HARP-F can fund local NGOs directly on a multi-year basis (Stoddard et al., 2017, p. 28). The 2018 Interim Assessment found HARP-F has been able to deal with a large number of grants to local /national organisations; focus on capacity building of organisations in tandem with grant-making; undertake greater scrutiny and quality assurance of projects; and complementary research (Bhattacharjee and Hale, 2018, p. 4). Overhead costs have been in line with other funds in the country. Issues have included the lack of an effective process by Crown Agents, HARP-F and DFID to communicate key information, resolve differences and make timely decisions, with complaints of micro-management by DFID (Bhattacharjee and Hale, 2018, p. 4). Recommendations include DFID and HARP-F establishing “clear parameters, mutual expectations and red lines for development of partner proposals” (Bhattacharjee and Hale, 2018, p. 5).

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## Key websites

- OCHA – Country Based Pooled Funds <https://www.unocha.org/our-work/humanitarian-financing/country-based-pooled-funds-cbpfs>

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## About this report

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