

**Enabling the
local response:
Emerging humanitarian
priorities in Ukraine**
March–May 2022



Photo by [Алесь Усцінаў](#)



United Kingdom
Humanitarian
Innovation Hub

Humanitarian Outcomes

Enabling the local response: Emerging humanitarian priorities in Ukraine March–May 2022

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This brief describes the state of the humanitarian response in Ukraine three months after Russia's military invasion threw tens of millions of people into crisis. It summarises the findings of a rapid review conducted by Humanitarian Outcomes in May 2022, which included interviews with 60 informants from national and international humanitarian aid groups as well as donor governments (list appended), and data on aid operations and funding. The brief focuses specifically on aid activities inside Ukraine as opposed to in refugee-hosting neighbouring countries, and figures are current as of 20 May 2022.

The rapid review was commissioned and supported by the UK Humanitarian Innovation Hub with UK aid from the Foreign, Commonwealth & Development Office. The research team consisted of Abby Stoddard, Paul Harvey, Nigel Timmins, Varvara Pakhomenko, Meriah-Jo Breckenridge, Monica Czwarno, and Eta Pastreich. The sponsors and team at UK Humanitarian Innovation Hub provided research direction, quality assurance, and management support. We gratefully acknowledge the inputs of all who gave their time to be interviewed, some of whom preferred to remain off the record, and our practitioner peer reviewers. The report represents the views of the authors, based on evidence gathered. More details on the methodology are [available here](#). For further information, please contact info@humanitarianoutcomes.org or info@ukhih.org.

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Acronyms

ICRC	International Committee of the Red Cross
IMF	International Monetary Fund
IOM	International Organization for Migration
NGO	Non-governmental organisation
OCHA	Office for the Coordination of Humanitarian Affairs [UN]
UN	United Nations
UNHCR	UN High Commissioner for Refugees
WFP	World Food Programme



United Kingdom
Humanitarian
Innovation Hub

info@ukhih.org

Humanitarian Outcomes

www.humanitarianoutcomes.org

www.aidworkersecurity.org

Summary

The Russian invasion of Ukraine in late February 2022 led to an estimated 16 million people either displaced from their homes or struggling to survive under extreme conflict conditions – and in urgent need of humanitarian assistance. What amounts to a massive, sudden-onset emergency involving high risks for aid operations has brought challenges both new and familiar to the international aid system. Although the situation continues to change daily, some key features and issues of the evolving aid response have become clear. A review of data and interviews with national and international humanitarian actors and experts during May 2022 revealed the following broad trends and issues.

A bottom-up, demand-driven humanitarian response with limited international presence

For the first six weeks post-invasion, virtually all humanitarian aid inside Ukraine was organised and implemented by local actors, including around 150 pre-existing national NGOs, church groups, and around 1,700 newly formed local aid groups. An informal aid sector has developed organically, with groups largely following a similar operational model: volunteers pooling personal resources, responding to incoming requests for assistance in their area, and incrementally expanding their reach as resources allow. These groups (together with local authorities), remain the principal aid providers but are quickly being exhausted of funds, fuel, and physical energy. The groups that are actively scaling up and becoming registered as new aid organisations have done so by finding donors mostly from outside the formal humanitarian sector.

Among the international aid organisations already engaged in Ukraine, an acknowledged lack of preparedness and contingency planning for a full-scale Russian invasion meant time was lost in re-entry and scale-up. Active combat in parts of the country presents a serious obstacle for many organisations, including those who had been operating in Ukraine prior to the invasion, most of which had shifted to non-emergency, resilience-oriented programming. At the time of writing, around two dozen international NGOs, together with the UN humanitarian agencies and the International Committee of the Red Cross (ICRC), had staff and programmes starting up inside Ukraine. Operational data and publicity materials tend to overstate international aid presence inside Ukraine, which is still mostly concentrated in the west of the country and across the border.

Financing bottlenecks and failures of localisation

Despite raising significant sums of money in the first days and weeks of the crisis, international organisations could not provide rapid infusions of resources to strengthen and expand the existing local response efforts while they ramped up their own programming. Instead, three months later, most of the money was still unused, sitting with international organisations that are constrained from funding by compliance requirements that are too heavy and time-consuming for small volunteer groups to meet. Even aspirational objectives and benchmarks for ‘localisation’ have been absent from international response plans, as have the previously agreed-upon basic tools for national organisations, such as single unified forms to enable simpler funding applications and reporting across multiple international partners.

Operational challenges: recruitment and cash programming complications

Ukraine's martial law and widespread mobilisation and conscription – not to mention displacement and emigration of large segments of the population – are among the factors making recruitment of staff exceedingly difficult for international organisations. Many must bring in much larger numbers of expats than usual, leading to start-up delays and problems finding accommodation. These difficulties, combined with the obvious challenges of programming amid conflict insecurity, argue strongly for direct cash distributions to people in need – particularly since in much of the country, markets, supply chains, and basic services are functioning. Cash programming has consequently been a primary emphasis of the international response. The inability to harmonise different actors' objectives and criteria has meant that, instead of international entities topping up and helping to expand the government's pre-existing social protection mechanism as a unified system (or alternatively setting up a unified humanitarian cash mechanism), multiple cash distribution platforms and registries have been established. This has arguably allowed cash to start flowing faster, but there have also been reports of some people still waiting for disbursements two months after registering, as well as instances of unhelpful competition and turfism among agencies' separate cash programmes.

In other sectors, familiar issues have emerged of supply-driven aid coming at the expense of supporting existing capacities. For example, parallel health capabilities set up outside Ukraine's existing health network.

Unintended outcomes in risk management

Ukraine is a high-risk operational environment for aid in several respects, but the principle of 'programme criticality' holds that aid providers should be prepared to accept higher levels of risk when needs are critical. Despite the often invoked 'no regrets' approach to rapid response in Ukraine (erring on the side of moving aid as quickly as possible), fiscal compliance standards are inappropriately high, with agencies adhering to inflexible compliance regimes that are counter-productive to rapid response. In a familiar paradox, to mitigate fiscal risk, international organisations compete over the same limited number of established national organisations to partner with. This can quickly lead to national organisations becoming overstretched, thus creating the fiduciary risks that the internationals were trying to avoid. Meanwhile, in terms of physical security, the least resourced and equipped aid entities are continuing to shoulder the biggest risks, raising ethical issues for the sector that uses them as de facto endpoint providers.

Looming dilemmas in humanitarian principles and negotiated access

Powerful feelings of national unity among Ukrainians in the face of the Russian offensive has inevitably pervaded humanitarian action in the country, giving it an expression much more of solidarity than principled humanitarian neutrality and impartiality. For many Ukrainian volunteer groups and authorities, there is no defensible line separating aid to civilians with support to the military efforts, which they see as one and the same. This will increasingly challenge the operational and ethical framework of the international humanitarian actors, who worry that should Ukraine become mired in protracted or frozen conflict, secure access to people in need in the areas outside the government's control may become even harder than in the past.

To address these challenges, this review proposes a series of action steps, recommending international organisations focus their efforts on 1) rapidly infusing resources and support to the local aid efforts, eliminating barriers posed by inappropriate compliance frameworks; 2) scaling up cash programming that complements government systems while reducing the number of parallel mechanisms; and 3) finding principled ways to reach people in need in Russian-controlled areas.

Background to the current crisis, 2014–2021: From humanitarian surge to frozen conflict

When the Russian-backed separatist revolts took place in the eastern provinces (oblasts) of Donetsk and Luhansk in February 2014, the UN declared a humanitarian emergency and international agencies deployed to Ukraine, joining national NGOs in the region to help people displaced by the fighting and living in contested ‘grey areas’ around the line of contact. In that smaller, more geographically contained conflict, approximately three million people were affected and in need of aid. Humanitarian aid flows to the Ukraine response peaked in 2016 at US\$265 million, and total contributions across the eight years prior to the current crisis totalled US\$1.4 billion – a figure already exceeded in the first three months of 2022.

Access constraints and humanitarian principles

By 2017, only two international organisations and one Ukrainian NGO had obtained official permission to work in the separatist, non-government-controlled areas. Access for people and aid across the contact line was blocked by ongoing fighting as well as bureaucratic obstacles and tight controls. Presaging the current operational conditions, the aid response in non-government-controlled areas largely relied on informal, opportunistic deliveries conducted by “local groups, including charitable and civil society organisations, private philanthropic organisations, church groups and networks of individual volunteers and activists.”¹ However, the period also saw the development of a cadre of Ukrainian NGOs working in the area in partnership with the international actors and accustomed to the modalities and norms of international humanitarian response. For example, despite a number of the Ukrainian NGOs having evolved into operational organisations from political solidarity groups, for the most part, the established organisations working with international support actors understood the principle of strict separation of civilian humanitarian aid from support for fighting forces.

As the conflict ground on and negotiations failed to bring a resolution or lasting ceasefires, faced with dwindling funding, international agencies started to shift from emergency assistance to longer-term, resilience-oriented programming. As a result, the profile of staff and programming in place at the time of the 2022 invasion was not the same in scale and type of expertise as during the humanitarian surge in 2014.

Decision-making and contingency planning in advance of the invasion

When Russia launched the invasion on 24 February, agencies’ initial reaction was one of surprise and their priority was to secure the safety of staff and their families. The first days after the invasion were marked by agencies withdrawing staff westwards or out of the country altogether. In the absence of business continuity plans there was a need to regroup and consider their next steps.

Interviewees among the international agencies widely acknowledged that there was a lack of preparedness. Even though the Russian military build-up started in December 2021, until February 2022 most did not consider a full-fledged invasion likely, and the few that were considering it as a scenario within contingency plans were reluctant to discuss it externally.

¹ Barbelet, V. (2017). *Humanitarian access and local organisations in Ukraine*. Overseas Development Institute (ODI), p. vi.

Hopes that war could be avoided, and the sense that it was impolitic and insensitive to predict otherwise, added to this reluctance and meant that agencies did not draw up preparedness plans. Moreover, for an already underfunded and shrinking aid response, engaging in proper preparedness efforts did not seem tenable. When resources are scarce, funding is directed to known needs rather than to investments in preparedness activities, and no exercise in hindsight makes the logic for that decision any less compelling. Even those organisations and clusters that undertook contingency planning said they had underestimated the probability that the attack and resulting humanitarian crisis would unfold at the scale that it did.



The humanitarian response to date: Operational presence and obstacles

The three-month point of a sudden-onset humanitarian crisis has operational significance as it marks the time by which the international system should be fully activated and working at full capacity.² This is not the case after three months of conflict in Ukraine for a variety of reasons, both external and internal to the aid system. Before examining them, it is worth remembering that even if the international sector was fully mobilised and deployed inside Ukraine, it would still struggle to provide the necessary coverage for 16 million people spread across the second largest country in Europe, where a war is raging.

The Ukrainian government and civil society have taken the lead and will continue to lead in the humanitarian response. The challenge for the international humanitarian system is finding how best to complement, support, and add value to national and local efforts.

National actors

Unlike in many other conflict-driven humanitarian crises, a strong and assertive host government and developed civil society exist in Ukraine, as does a developed and substantial social protection system (which made up 23% of total government spending in 2019, roughly half in pension support). There are also systems for social work and child protection to identify and support the most vulnerable. Since the invasion, people have continued to receive benefit payments, including pensions and child benefits, though with some reported delays, and the government is making efforts to provide additional emergency payments to displaced people and others newly in need.

Similar to the international community, Ukrainian authorities were surprised by the scale of the Russian attack and were not prepared to respond to a humanitarian crisis of this breadth. Although their response was overall improved from the 2014 experience (when, according to those involved at the time, the system simply collapsed in some areas), some of the humanitarian hubs set up by officials in each region have received public criticism as non-transparent and mere “PR projects”. According to interviewees among civil society, the relationship and quality of coordination with authorities varied widely from place to place. Some reportedly have not effectively coordinated with volunteer groups and NGOs, whether because they did not have the necessary information or were not willing to share it. Apart from those familiar with prior aid programming in the Donbas region, local authorities are equally unfamiliar with humanitarian modalities and principles. Additionally, most have dual civilian and military roles, and many elected officials are being replaced by appointees under martial law.

Approximately 150 Ukrainian national NGOs were operational in humanitarian response prior to the current crisis, concentrated along the lines of contact in Donbas.³ Since the invasion, many more civil society groups, such as those engaged in political advocacy, as well as church groups, have shifted to operational humanitarian roles, and nearly 1,700 newly formed groups have applied to the government for registration as “charitable foundations or public organisations”.⁴

² Inter-Agency Standing Committee (IASC). (2016a). *What does the IASC humanitarian system-wide Level 3 emergency response mean in practice? Agreeing a common understanding of the L3 response*.

³ The research team found 147 in-country humanitarian provider organisations by triangulating Humanitarian Outcomes' Global Database of Humanitarian Organisations with OCHA 3Ws and Financial Tracking Service (FTS) data, and excluding individuals, diaspora charities and private businesses.

⁴ Government of Ukraine. (2022). *Diia.Business*. Retrieved 26 May 2022 from: <https://business.diia.gov.ua/en/cases/novini/vidrozdzena-ukrainskogo-biznesu-v-umovah-vijni-analitika-za-2-misaci>

Some experienced Ukrainian NGOs had contingency plans and partnerships with foreign NGOs (mostly national NGOs in Europe) prior to the invasion, which helped them to fundraise money at a very early stage of the crisis. Interestingly, according to these organisations, it was their non-humanitarian donors (for instance, international groups focused on democracy promotion and human rights) that responded more rapidly and managed to transfer larger and more flexible funding quickly, to support immediate humanitarian work. The Ukrainian Red Cross, supported by the ICRC and other members of the International Red Cross and Red Crescent Movement, was also able to ramp up relatively quickly. Finally, church groups and other local affiliates of international organisations that work through a partnership model have been able to receive ramped up funding from their international sponsors.

It is not to diminish any of the above efforts and actors to say that most of the aid that Ukrainians have been able to access during the first three months of the crisis has come from informal volunteer efforts. An ‘organic’ humanitarian response, these volunteer groups have sprung up across the country, and especially in areas where fighting has caused dislocation and disruption of daily life. Among the different volunteer groups interviewed for this review, and others described by interlocutors, was a striking similarity in their ways of working. Typically, a small group of friends and associates begins work by pooling its own money and other resources, such as vehicles and relevant know-how, and responds to needs it sees in its immediate community for household and shelter items. Word spreads of its existence through informal networks and requests for aid start coming in – directly from people and from local municipal administrations – to which it responds. Some of these groups have diaspora contacts that provide them with money and access to other private donors, and some have volunteers making repeated trips outside of Ukraine (such as Poland and Romania) to seek out more donors and purchase items that are difficult to come by in the areas where they are working. Some of their work involves significant physical risk. One typical activity involves sending vehicle loads of aid into a besieged community or areas of active hostility, distributing it and bringing out people who wish to evacuate to safety.

Volunteers report that they are “burning out”, physically and emotionally, and their financial resources are drying up having gone through “everything we had in our own wallets” and initial donations. Many are searching for a way to compensate the work of the volunteers and expand their reach and activities but are inexperienced in fundraising and unaware of how to find and work with donors and international partners. For its part, the international humanitarian sector has so far failed to ‘meet them where they are’, uncertain how to incorporate support for these volunteer groups into their normal local partnership structures. One international NGO representative speaking of the volunteer groups said their model “makes it really challenging to establish partnerships, as our normal tools of capacity assessment and due diligence do not work”.

Table 1: Taxonomy of Ukrainian non-governmental humanitarian actors

'Traditional'	Established humanitarian NGOs, founded in 2014/15 or earlier	<ul style="list-style-type: none"> • Clear on international humanitarian law (IHL) and the line between military and civilian aid • Already partnering with international humanitarians and familiar with coordination and funding structures
'Transfers'	Human rights, political advocacy and other civil society organisations now taking on humanitarian roles	<ul style="list-style-type: none"> • Less familiar with humanitarian system • Have their own international non-humanitarian donors/partners
New entrants	Smaller NGOs, recently obtained, or currently applying for, formal NGO status	<ul style="list-style-type: none"> • Starting out with similar model as volunteer groups but attempting to grow and professionalise • Developing operational systems and organisational identities • Bringing aid (and seeking international support) across borders • Diaspora and non-traditional funding
Volunteer groups	Temporary, informal arrangements at local level with limited, if any, external funding	<ul style="list-style-type: none"> • Mostly unaware of international humanitarian coordination and funding • Mostly not distinguishing between humanitarian and military aid and responding to requests from both • Currently doing most of the aid delivery and taking enormous risks

Finally, a large proportion of interviewees (especially the smaller local NGOs but also their international counterparts to a lesser degree), mentioned fuel scarcity as a major stumbling block. In many parts of the country, fuel is being rationed, and while larger agencies have cards connected to specific filling stations that allow them to exceed ration limits, smaller organisations and volunteer groups do not. Providing donated fuel, or fuel access allowances, appeared as an important gap waiting to be filled.

International actors

In the first weeks and months of a major and rapidly unfolding humanitarian crisis, aid operations and coordination for effective response often suffer from poor transparency and weak uptake of previous lessons learned. When the emergency also entails active armed conflict and severe access constraints, the deployment picture becomes murkier. International agencies lack incentives to operate in the places of greatest need, where security risk from combatants combines with fiduciary risk imposed by donors to create too high a threshold for most. At the same time, they are incentivised to appear to donors and the public as more present and operational than they are.⁵

⁵ Stoddard et al. (2017). Out of reach: How insecurity prevents humanitarian aid from accessing the neediest. *Stability: International Journal of Security & Development*, 6(1): 1, pp.1-25.

In contrast to the impression given by compiled operational data (and some fundraising and publicity materials) by mid-May, close to the three-month mark post invasion, some 20 international NGOs were operational inside Ukraine with staff and programmes running, contrasting with the hundreds setting up programmes to help neighbouring countries absorb and assist the refugees, and/or channelling funds through operational organisations inside Ukraine.⁶

With a few exceptions, even the international agencies with prior presence inside Ukraine needed at least five weeks to re-enter and ramp up before they began any aid delivery. The handful of internationals that had teams inside Ukraine in April were just starting to become operational but not reaching non-government-controlled areas or highly contested areas like Mariupol. At the time of writing there was still scant international presence in these hotspots, and there was hushed talk of some international aid groups considering or planning to access these areas from the Russian side of the border but no confirmation of this. Given security risk, other incoming international NGOs were initially reluctant to set up in Dnipro, where the UN Office for the Coordination of Humanitarian Affairs (OCHA) was establishing a coordination hub, and other places more proximate to the most urgent areas of need. Rather, they were clustering in Lviv – a major city in the west, close to the Polish border. A donor representative reportedly expressed disappointment at the lack of international presence in hard-hit places like Bucha and Irpin. However, security is expected to remain a major obstacle to expanding the international aid footprint for some time. Unlike UN agencies and donor governments, most international NGOs do not possess multiple armoured vehicles or the capacity to securely transport and accommodate staff amid active major armed conflict.

In addition to security challenges, international organisations face major operational hurdles in recruitment and staffing. With millions having relocated or left the country, and Ukraine’s martial law requiring widespread conscription for military service, agencies have reported extreme difficulties in hiring national staff. The personnel scarcity affects all aspects of programming; one UN interviewee recounted dealing with delayed relief distributions “for something as dumb as there just weren’t enough drivers”. Fewer nationals available to hire means more expat staff to bring, which is costly and causes further delays. One INGO team leader in Lviv further observed that the influx of expats was “pricing IDPs out of affordable accommodation, so it’s actually preferable to have a guest house or expensive hotel rather than affordable housing for INGO workers”.

Operational transparency: Unclear picture of the humanitarian footprint

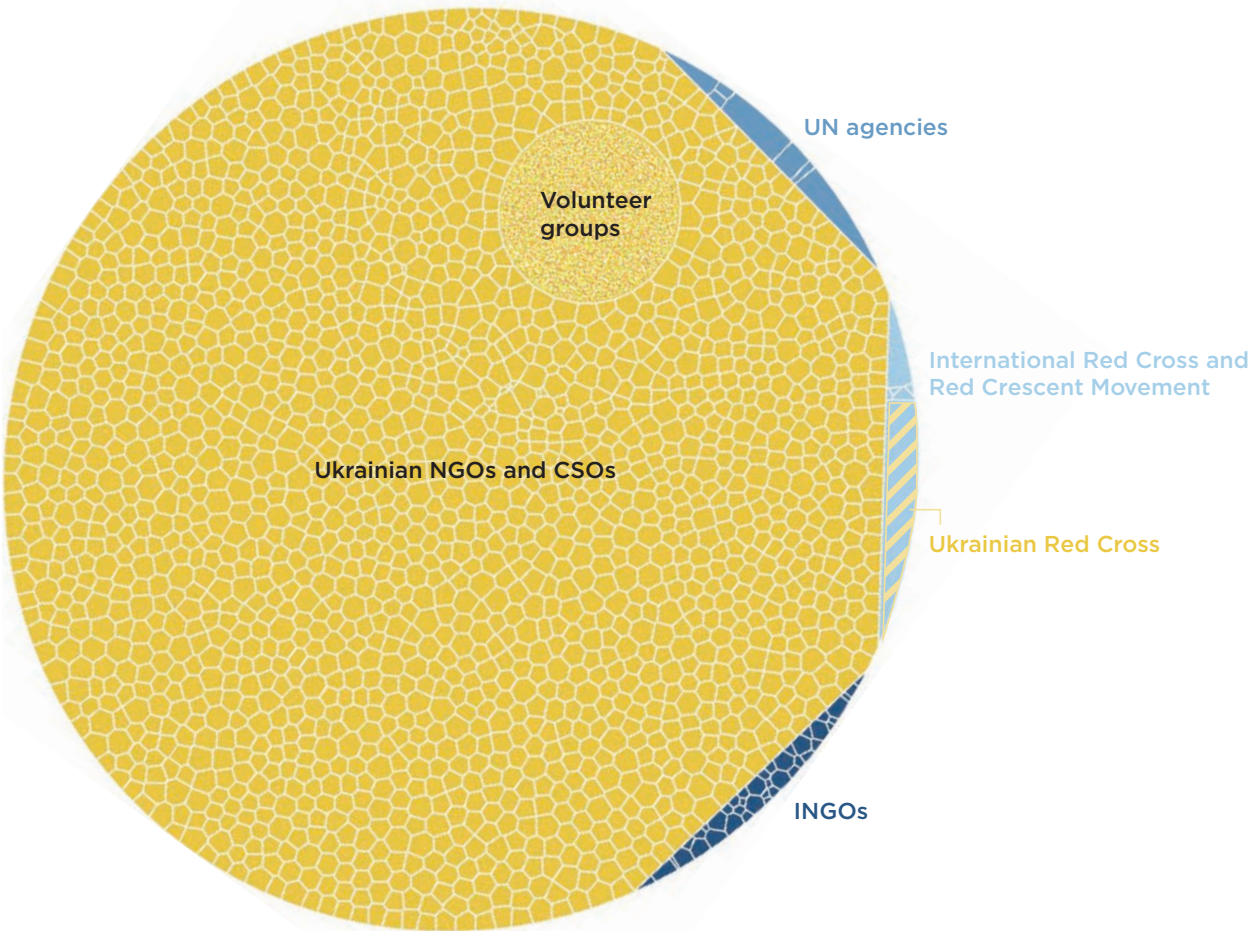
Operational presence data is available and regularly updated on websites supported by OCHA (HDX, [humanitarianresponse.info](https://www.humanitarianresponse.info)), but can be challenging to interpret. The ‘Who does What, Where’ data (known as 3Ws/4Ws/5Ws) is useful for seeing which organisations are funding aid activities in Ukraine, but potentially misleading when trying to determine which organisations have a physical presence (staff and ongoing aid programmes) in the country. For example, many INGOs that are included in the numbers of operating organisations are programming cash or supporting activities remotely from outside Ukraine, overstating the number of organisations with physical programme presence. And the necessity of voluntary self-reporting for compilation of this data leaves open the possibility of over or under-counting. In parallel, there are multiple government-run information platforms (Ukraine is a very digitalised country), and these do not necessarily feed into the information that the international system is gathering.

⁶ For examples of operational data compilation, see, for example: <https://www.humanitarianresponse.info/en/operations/ukraine>

Taking on board the above caveats, the operational data shows that the increase in international aid presence in Ukraine since the invasion has been mostly in the western part of the country, where access and security are less of a problem. Nationally, the number of national and international NGOs reported in ongoing programming has doubled over the course of the last year – but in the east of the country, the number has dropped. Needs do vary geographically. For example, protection needs are a clear concern among the displaced population, many of whom travelled west, while health is a priority closer to the conflict areas in the east. As the majority of the country shifts to development and rebuilding, it remains to be seen whether or not the eastern regions will see the massive aid scale-up reported in the country as a whole. Data for Donetsk and Luhansk (the original epicentre of the humanitarian crisis) from June 2021 to May 2022 shows that needs have increased since the invasion, while the number of organisations working there has decreased.

Figure 1: Operational presence

Humanitarian providers inside Ukraine are depicted here by number of organizations and their average staff size.



Data sources: GDHO (www.humanitarianoutcomes.org) and OCHA (www.humanitarianresponse.info/en/operations/ukraine)

Coordination

Ukrainian interviewees expressed surprise and disappointment at “how slow the UN was, despite being here for eight years” – perhaps unfairly, given OCHA’s relative speed in scaling up. Cluster coordination began officially in mid-April, but a month later not all clusters were up and running in key oblasts, and interviewees pointed out that no capacity scoping had yet been done and that the participation of local organisations was limited. Some local organisations interviewed knew of the clusters but did not see the value of attending given their workload. Others had negative perceptions of “corrupt” and “bureaucratic” processes, and others had no idea of the clusters’ existence.

Other deficits mentioned by international interviewees included that the humanitarian country team did not include any explicit localisation objectives, and the most recent joint needs assessment did not include the standard question on languages. As pointed out by an expert consulted for the review, Ukraine is home to more than 20 languages, according to the latest census, and the omission of this question speaks to a western-centric habit of the aid sector of simply assuming which languages are to be used, neglecting minority language groups, and ultimately putting the entire burden for interlingual communication on local staff.

Cash programming and other key sectors

Directly providing cash to people in need has gained prominence as a best practice in emergency response and is seen as preferable to traditional humanitarian aid (in places where markets and supply lines are functioning) given its potential for speed, efficiency, relevance (people decide for themselves what they need), and scalability. Ukraine would appear to be a model scenario for a cash-heavy humanitarian response, and the sector has emphasised cash programming accordingly, directing a great deal of effort and attention on setting up a cash response as quickly and at the largest scale possible, particularly to support displaced people in the west of the country. The Inter-Agency Cash Working Group (CWG) has allowed for coordination between agencies around transfer values and targeting approaches. The CWG has set a goal of registering two million people for cash assistance by August (though as some critical observers pointed out, ‘registering’ is not the same as ‘disbursing to’). As of 19 May its online information dashboard reported that 688,000 people had received humanitarian cash assistance as (at an average of US\$164 per beneficiary).⁷ [Note: these figures jumped in the last week of May, with reports of 1.5 million people reached and \$171M disbursed.]

Initial hopes for a single channel for cash programming linked to the existing social protection system and expanded by international contributions failed to materialise due to conflicting regulations and constraints. For instance, UNICEF hoped to top up the government’s existing child benefits, but its funding guidelines do not allow for direct national budget support, and the government was unable to accept earmarked funding through its systems. There were also data protection challenges around sharing the information of existing social protection recipients and newly registered displaced people.⁸

In the meantime, therefore, international cash assistance is being programmed through several separate mechanisms, including platforms set up by UNICEF, United Nations High Commissioner for Refugees (UNHCR), International Organization for Migration (IOM), World Food Programme (WFP), and the International Red Cross and Red Crescent Movement, using

⁷ Office for the Coordination of Humanitarian Affairs (OCHA). (2022). *MPC Activities Interactive Dashboard*. Humanitarian Response. Retrieved 20 May 2022 from: <https://www.humanitarianresponse.info/en/operations/ukraine/cash-working-group>

⁸ Agreements and memorandums of understanding are now being signed between the Ministry of Social Policy and aid agencies, which will allow the government to provide data to agencies of people who can be added onto their programmes.

different forms of registration process and targeting criteria. For example, UNICEF uses an online self-registration portal for large and single-headed families, followed by a verification process, and WFP provides registration tokens to people when they register as displaced with the government. Efforts are underway to agree and use a mechanism to tackle possible duplication, but the initial focus was on registering as many people as possible.

The goal of having two million people registered by August is speedy and sizeable compared to other humanitarian responses but seems surprisingly limited given the estimated number of displaced people and others in need of assistance. Two million represents only an eighth of the current estimated number of people in need, August is a full six months into the crisis, and being registered does not necessarily imply that all two million will have received cash by then. Additionally, the sector is mostly not directing cash to people in non-government controlled and heavily conflict-affected areas, presumably because of banking disruptions and the lack of ability to verify recipients. Much larger scale direct support to the government from international financial institutions to plug the estimated US\$5 billion a month budget deficits created by the conflict could enable the government to scale up its own existing benefits and emergency payments. However, this will take time and there is continuing uncertainty over the levels of support that will be available.⁹

Outside of cash, other key sectors for the international humanitarian community include health and protection. Notable in the health sector, some agencies have sought to establish their own medical capabilities, while others argue that the priority is supporting the existing primary healthcare network. In contrast, local agencies that provided repairs and emergency rehabilitation of damaged health infrastructure have been particularly appreciated, allowing the healthcare system to resume any disrupted activities. In general, local actors and authorities value activities that create an enabling environment for existing capacity, such as provision of medical supplies, more than wholly new services and interviewees recounted coordination meetings where Ukrainian authorities were strongly discouraging INGOs from setting up mobile clinics and other parallel mechanisms.

The most pressing need in terms of humanitarian protection has been the evacuation of civilians trapped in areas of intense fighting. From March, the ICRC, in coordination with the UN, facilitated the safe passage of 10,000 civilians out of Sumy and Mariupol. The risks and complexities of such an operation, particularly the need to negotiate agreements with the warring parties for safe passage, highlights how protection is one area where an international humanitarian presence can be vital.

⁹ Financial Times. (2022, 20 April). *Ukraine needs \$15bn over next three months, says IMF*. Financial Times.

Partnership issues: Localisation commitments forgotten?

In the urgency of launching response efforts to a sudden-onset crisis, individual organisations predictably focus inward on their own activities and have little time to spare for advancing common goals and standards for localisation. To date, the Ukraine response has followed the same pattern, and specifically it has not met, or put in place the conditions for meeting, the stated localisation commitments of the Grand Bargain, which include to:

- “... work to remove or reduce barriers that prevent organisations and donors from partnering with local and national responders in order to lessen their administrative burden ...
- ... target at least 25% of humanitarian funding to local and national responders as directly as possible ...
- ... make greater use of [pooled] funding tools which increase and improve assistance delivered by local and national responders.”¹⁰

One of the most frequently noted issues has been the inability of international organisations to fund smaller groups at the frontlines of aid delivery because of compliance regimes that are insufficiently flexible to the circumstances. Rather than ‘removing or reducing barriers’ to partnering, the international organisations are competing with each other to partner with the limited number of national NGOs able to meet their compliance requirements. Aside from capacity for fiduciary controls, international programme managers want to trust that the partners are effective and principled – and building trust is a process not conducive to rapid, ‘no regrets’ programming. One international NGO interviewee said they did not doubt that their proposed partners were trustworthy, but since for them the “humanitarian context was new”, they needed training on things like minimum standards, protection, humanitarian principles, and safeguarding against sexual abuse and exploitation. This dynamic has created some tensions between field staff, who are moving cautiously, and HQ leadership, who are growing increasingly concerned about not being able to programme the money they raised in a timely way, with all the bad optics that result. The high level of interest in Ukraine from leadership made it possible for organisations to rapidly allocate and deploy experienced staff to competent and well-equipped surge teams after the invasion. However, it also meant there was pressure to make fast decisions on a no-regrets basis.

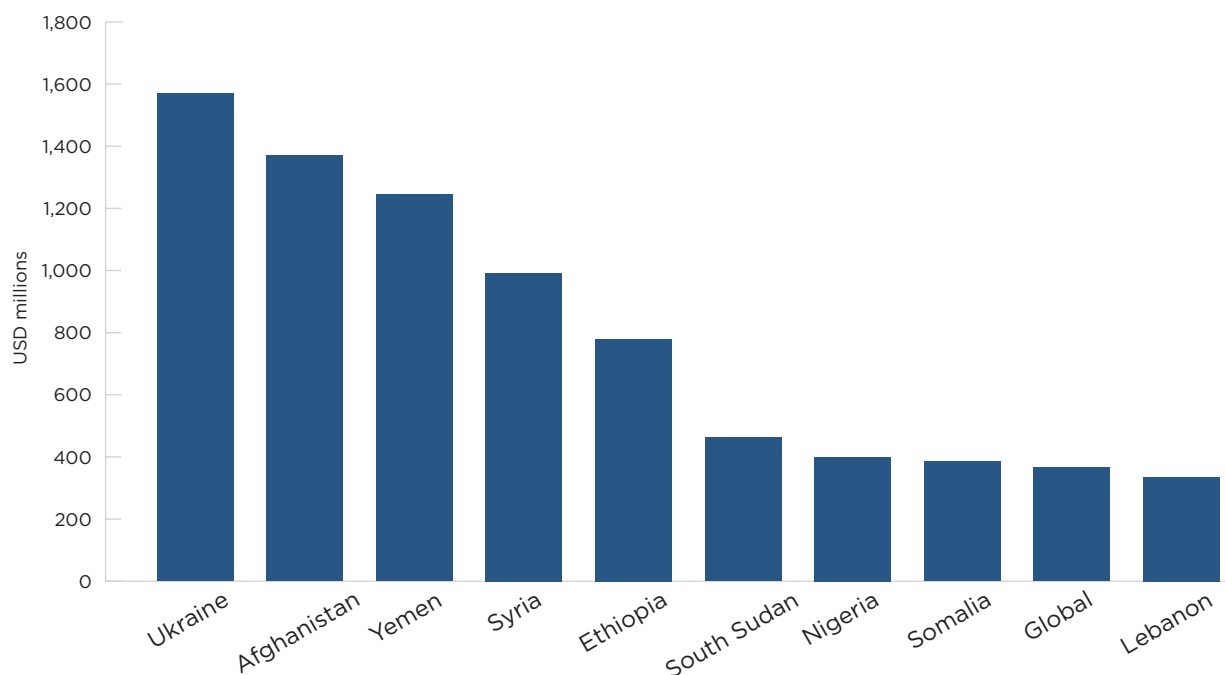
¹⁰ IASC. (2016b). The Grand Bargain – a shared commitment to better serve people in need, p.5.

Financing, big and small

By any measure, Ukraine is attracting a large volume of international aid funding. Even before the US government approved a US\$40 billion overall package to Ukraine for military and non-military aid, the Ukraine flash appeal had received over a billion dollars in bilateral humanitarian flows, making it the highest funded emergency in just the first few months of 2022 (Figure 2). This sum will surely rise higher still as governments allocate more for longer-term recovery and reconstruction aid, and as the huge sums of private money from individuals, foundations, diaspora groups and corporate donors start to be counted.

Large-scale support to the government from international financial institutions (International Monetary Fund and World Bank) and bilateral donors is now being put in motion to fill the estimated US\$5 billion a month shortfall in the national budget. This will enable the Ukrainian government to continue to pay salaries, and maintain benefit payments and social services, and will certainly dwarf humanitarian assistance funding. International humanitarian aid agencies seeking to spend the billion plus raised through humanitarian channels should focus on how best to complement and fill gaps in the government's response as well as support existing civil society and volunteer efforts.

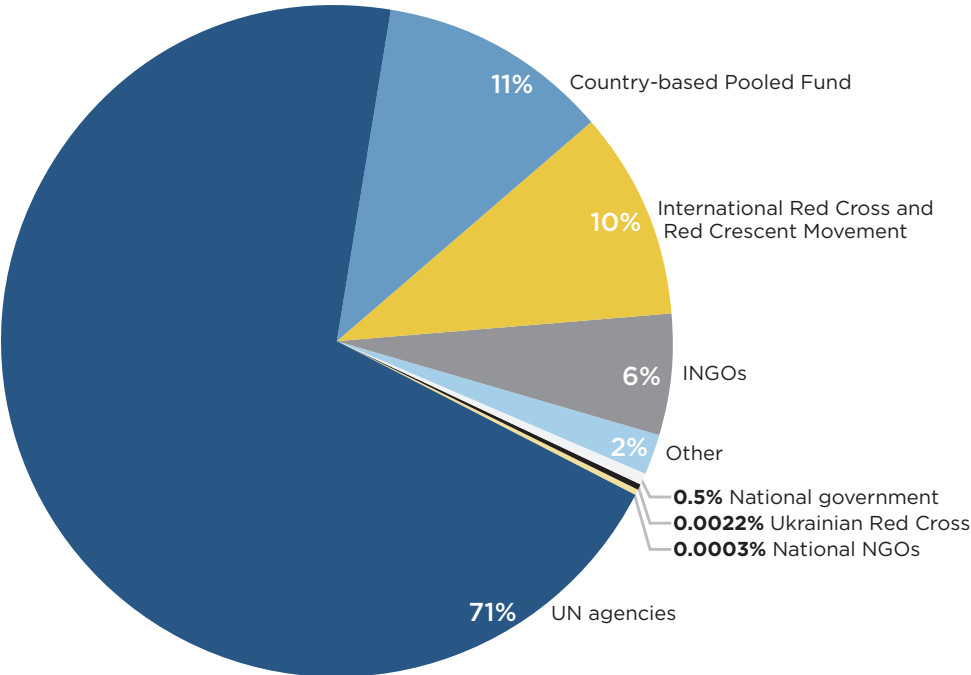
Figure 2: Ten highest funded humanitarian emergencies, 2022



Source: UN FTS 2022

As of 20 May 2022, the UN Financial Tracking Service (FTS) showed that UN agencies had received close to two-thirds of the Ukraine humanitarian aid funding, much of which will be sub-granted to NGO implementing partners. International NGOs have so far directly received 6% (or US\$89 million) of these bilateral humanitarian contributions, but unlike some other humanitarian emergencies, the international NGOs have raised unusually large sums from their donor publics in the West (multiple organisations reported having received tens of millions in just the first few weeks of the crisis, some in the range of US\$70 million to US\$80 million). National NGOs have received only 4.4 million in direct funding, or 0.003% (Figure 3). The country-based pooled fund in Ukraine (now the world’s largest), will make up some of the imbalance, with 28% of its third allocation planned to go to local organisations. But in terms of humanitarian funding writ large, at the moment it is hard to see how the 25% target for local actors will be reached.

Figure 3: Allocation of humanitarian contributions as of 23 May 2022



Source: UN FTS 2022

Sub-granting/partnership funding: The gap between big and small money

Medium to small-sized Ukrainian NGOs (the majority) say they are unable to access funding support from international organisations for rapid response due to contracting processes that are stringent and slow. One interviewee spoke of how their organisation was trying to support community groups in Kharkiv who were working with hospitals to deliver medicines and other aid to vulnerable people who were stuck, unable to travel. But their effort largely failed when they could not get UN agencies or international NGOs to provide support and were presented with due diligence processes that take three months.

Trade-offs and risks come with all forms of partnership funding (Table 2), but there does not seem to be any model within the humanitarian sector for rapidly supporting the emergent local response efforts.

Table 2: Approaches to local actor funding seen in Ukraine response

Approach	Description	Downsides
Local umbrella funding ('trickle down')	Large INGOs funding umbrella networks of national organisations to then transfer smaller grants to local groups	Entails risk of overstretch to umbrella national NGOs
Threshold funding	Cap on grants, under which heavy compliance not attached	Efficiency costs if grants are artificially small
Multi-intermediary chain funding	International NGOs entering partnerships with other international NGOs that have local partners to channel their money down to the locals	Inefficiencies caused by cascading overheads and slowness
Individual funding ('diaspora direct deposit')	Preferred by small volunteer groups	Lack of transparency and fiduciary risk

“On the second day of the war I got contacted by [an advocacy organisation in Europe], they just proposed to send me 5,000 Euros to spend on ‘whatever you believe is most important for now.’ That was unexpected, but so great. We managed to send money to Mariupol and Melitopol. Traditional big donors were in shock and acted very slow. By now they have released calls for proposals, but they are just the same like before February 24 –long and bureaucratic. We’re asked for very detailed plans but we don’t know what’s going to happen and can’t plan for a long time ahead. We don’t have enough people to develop elaborate proposals. My finance manager in Cherkassy goes to the shelter every time he hears the siren. This happens very often and makes proposal development quite a challenging process. But big donors don’t want to micromanage small grants, they prefer to work with the big organisations which have multiple layers of staff, consuming a lot of money. I believe we need more ‘small money’ in Ukraine. The best projects we ever implemented were done with a small money.”

Local NGO director

Insecurity and other risks

The operational environment in Ukraine comprises risks that range from shelling, landmines, and hostile armed actors to the potential for chemical, biological, radiological, and nuclear weapons to cyber-security attacks and infowar. Such an environment demands strong collaborative coordination efforts by humanitarian actors, which has largely not materialised to date. Security coordination mechanisms (United Nations Department for Safety and Security (UNDSS) and International NGO Safety Organisation (INSO)) have recently increased their geographical reach and security data-sharing, and while these are positive developments, they have not yet extended to all the local organisations working as frontline aid providers. Coordination and information sharing among local volunteer groups and national NGOs relies on personal relationships and social media connections. As to the security information being circulated, interviewees mostly characterised it as data-centric, repetitive, and lacking the necessary synthesis and analysis. Coordination around humanitarian deconfliction, a process of negotiation and organisation between warring military parties to allow for the safe operation of humanitarian programming and transport, is currently limited to a notification process that provides no guarantee of security.

Overall, implementing safety and security training to support local organisations, volunteer groups, national NGOs, and other responders seems largely ad hoc, but some UN and international NGO actors mentioned that they are currently planning on providing hostile environment and awareness training (HEAT)-type training and psychological first aid within Ukraine and in Poland, including training-of-trainers. At the moment, they are helping local partners mitigate their risks in small ways by providing them with things like individual first aid kits, radios, and mine awareness.

Humanitarian organisations face risks of cyber-insecurity and systematic disinformation campaigns, which can have significant reputational risks and cause mistrust and rifts among communities and partners besides becoming a security risk for staff on the ground. These low-resource but high-reward strategies have the opposite effect on organisations that then have to spend a lot of resources and time doing damage control and recovering from the incident. The cyber attack on the ICRC's servers, uncovered in Geneva in January, highlighted the humanitarian sector's vulnerability to cyber attacks and the potential for theft of beneficiary, volunteer and staff data, the targeting of financial transaction data and mechanisms. More broadly, cyber threats could create increased humanitarian needs, for instance, if public utilities are targeted during increased periods of vulnerability (such as during the Ukrainian winter).

Other, more traditional risks remain, such as the fiduciary risk of loss, theft, and corruption. One local NGO spoke of corruption and criminality in the railway system, where some organisations are being made to pay for "storage and transport fees", and in one case a whole train car of cargo got stolen. Mitigating against this type of risk is behind the compliance and due diligence systems that impede funding local NGOs and rapid response. Fiduciary risk mitigation can have a boomerang effect, however, such as when international organisations concentrate their funding to a limited number of national NGO partners that can meet the requirements. These organisations can become overstretched, which raises the risk of mismanagement and loss, theft, and corruption (Figure 4). International NGO informants also noted the complexity of the Ukrainian legislative environment poses an additional layer of legal/fiduciary risk.

Figure 4: Potential perverse outcomes of risk mitigation



Source: Stoddard et al. 2019¹¹

Humanitarian principles

Although every humanitarian response is political, many practitioners commented on how especially politicised this one feels. Multiple respondents noted how senior officials within their organisations were more interested than usual and had, intentionally or otherwise, created a sense of pressure to deliver – and deliver quickly – despite the huge fluidity and uncertainty of the situation, as well as the significant capacities that exist within Ukraine and refugee-hosting countries.

An ongoing challenge is confusion around the notion of humanitarian neutrality and its role as an operational means or a political stance. Neutrality is often confused with advocacy and the ability to speak out, whereas a current area of discourse holds that solidarity could at times be more useful as a tool for access to populations at risk and more aligned with the localisation agenda.

While international aid actors want to see this as a conflict where they seek to support non-combatants and maintain a level of separation from the parties to the conflict, within Ukraine it is understood as a conflict for self-determination against an aggressor that is also a major power and a permanent member of the UN Security Council. Thus, Ukrainians expect solidarity and not to be treated ‘equally’ as a combatant alongside Russia. This makes it difficult to maintain a distinction of aid for civilians and that being provided to the military, when given conscription and strong feelings of needing to defend their homes, many Ukrainians do not see any problem with donated items going to support military units, which are composed of family and community members.

As witnessed in some of the public attacks made on the ICRC (amplified by Russian disinformation), maintaining a neutral stance is deeply challenging in such a highly politicised

¹¹ Stoddard, A., Czwaro, M. and Hamsik, L. (2019). *NGOs & risk. Managing uncertainty in local-international partnerships*. Global report. InterAction and Humanitarian Outcomes.

environment. While some have argued for a more solidarity-based approach to humanitarian assistance, most international respondents for this study expressed concerns about how such a close alignment with the government might impact on other humanitarian environments globally. Should humanitarians working in the occupied Palestinian territories be as equally willing to denounce Israel as they do Russia? If strong government capacity is used as an argument for close cooperation, then on what basis do humanitarians argue to preserve their operational independence from other governments like Venezuela and Ethiopia?

Access to, and even information on, the people now living in areas under Russian control is poor. There are a small number of UN and Red Cross staff working in areas now under Russian control, but proper access and the ability to supply them is not possible. Very few international agencies have cross-line access, or access from Russia, although there were reports of small-scale, cross-line humanitarian transfers taking place, mostly via informal networks of Ukrainians who knew each other and negotiated with commanders on both sides to facilitate some access.¹² Some agencies that did have contacts or small-scale operations were reluctant to speak of their work in areas under Russian control for fear of how that would be perceived in government-controlled areas, or that they might be used as pawns in Russian government propaganda.

Innovative approaches

At this stage of the response, most agencies have been focusing on scaling up and “delivering the basics well”. At the same time, this is a major response, which is relatively well funded in a novel context, and so potentially an amenable setting for innovation to emerge if there is a willingness to risk failure and try new things.

A few novel approaches have so far stood out. In trying to quickly scale humanitarian cash programmes, for instance, aid agencies have adopted new models for registration. Some, such as UNICEF, have taken advantage of widespread digital literacy and internet access to set up online self-registration portals, where people can register and upload their own details and relevant documents. WFP provided tokens with bar codes at government registration sites for internally displaced people, which could then be used to self-register. While the idea was to enable a much more rapid registration process, in practice, the need to clean up and verify the data slowed down the initial distributions. However, once established, the quicker registration process does have the potential for quicker scale-up.

In terms of localisation, some international NGOs and donors are developing funds specifically to disburse as small grants with reduced or innovative verification methods. The Global Fund for Community Foundations, where local organisations act as grant-making bodies, relies less on traditional ‘vertical’ due diligence processes and more on triangulating ‘horizontal’ reputational information and feedback from the communities they work with. The intention is to avoid ‘projectisation’ of local actors and to strengthen bonds of trust. Another approach to supporting the work of volunteer groups has been developed by Swiss Church Aid, HEKS. Having identified existing volunteer initiatives that wanted to expand their efforts but needed more structured finance and logistical support, HEKS hired the volunteers as staff, thereby making it a HEKS programme, with HEKS international staff doing the support work to meet funding compliance while the original initiative continues to identify needs and direct activities.

¹² In addition, the Russian Ministry of Defence regularly reports on delivering humanitarian assistance to those areas, and Russian (GO)NGOs deliver assistance into newly occupied zones, especially Mariupol.

Some international NGOs currently not active inside Ukraine seek to use the funding they have raised to fill gaps and play a support role in the form of providing 'humanitarian-to-humanitarian' support services, such as the security training courses mentioned above. Additionally, members of the logistics cluster are trying to address the issue of fuel scarcity with potential solutions, such as renting out filling stations that were left unmanned after the invasion for use by humanitarian providers at no or low cost, or alternatively bringing in tankers to park in key locations to serve the same purpose, rotating them out when empty.

Areas for action

Although a common refrain of people interviewed for this review was one of lament at the international humanitarian system falling into its old patterns, this self-awareness, combined with intense attention and pressure from bilateral and domestic public donors, may yet drive innovation and alternate ways of working.

If one were to pose a counterfactual, asking how the international aid sector's support to humanitarian response efforts inside Ukraine might look if it were optimised and free of its dysfunctions, it would probably have two main elements:

To help people trapped in besieged and conflict-affected areas where traditional aid agencies are mostly absent: grow the 'oil spots'

International organisations would quickly identify local aid initiatives and infuse them with resources to widen and strengthen their efforts including compensation and physical security inputs for their personnel, without requiring formal proposals or due diligence procedures that take any more than a day. To co-opt a military concept, building up the numerous tiny efforts at community level could see them grow like expanding oil spots, spreading to cover wider areas and combining with each other for better humanitarian coverage. Employing a true 'no regrets' approach would mean explicitly accepting that in acute emergency conditions there will inevitably be weak monitoring, some corruption, and losses, but that something is better than nothing during the time it takes for traditional aid programming to get running at scale.

To help people who have reached safety but need aid because of displacement and loss of livelihoods: turn on a cash firehose

Create a single cash pipeline for social support disbursements to all Ukrainians, without stratification for needs (on a logic similar to universal basic income) or requiring multiple registries with separate targeting. A universal basic income approach to cash aid during the crisis would help displaced and vulnerable people as well as the general economy. Many of the millions raised by individual organisations that have not found ways to spend it could be added to this pipeline, and potentially the donations of private donors anywhere in the world, bypassing the charity 'middleman'.

The above counterfactual is, of course, not realistic given the current international aid architecture, which resists change not only because of its international institutions but also because multiple domestic legislation controls its resource base, with concerns about misuse of money and other power abuses. But taking its basic logic – help those who are helping now, and put the generous outpouring of money to immediate use – can at least point us in the direction of positive action steps.

Localisation and responsible partner financing

- Increase field-level discretionary funding with minimal requirements for local volunteer groups recipients: small money, no regrets.
- Actively identify local organisations or volunteer initiatives already working in high need areas to receive rapid (24 hour) disbursements up to US\$50,000 without the need for proposals or heavy vetting or assessments.
- Consider the 'back office' support approach to local initiatives described above.
- Identify humanitarian-to-humanitarian services to provide to local actors, e.g. fuel and transport solutions, targeted training, secondments of support and technical personnel.
- For full-fledged partnership contracts, ensure fairness in indirect costs and in the co-ownership of all assumed risks (and including force majeure clauses) and provide for adequate security costing.
- In general, internationals should replace one-size-fits-all compliance frameworks for ones that are fit-for-purpose and appropriate to the context, and adopt a programme criticality approach to loosening due diligence requirements in acute emergency situations.
- Establish a shared platform for cross-organisational real-time learning on operationalising localisation efforts, to facilitate sharing of ideas and experiences in navigating the challenges set out above.

Cash programming

- While prioritising the rapid scale-up of humanitarian cash, reduce the number of parallel disbursement mechanisms.
- Focus humanitarian cash on complementing and filling gaps in government support (including a means to support people in non-government held areas.)
- Create funding mechanisms to directly support the relevant Ukrainian ministries involved in providing social protection and emergency payments.
- Explore 'cash plus' approaches that link cash with social protection and other forms of support, such as mental health, child protection, and employment interventions.

Risk management

- Acknowledging that the least resourced aid providers (volunteer groups) are assuming the biggest security risks, prioritise their protection and risk mitigation to the greatest extent possible, providing protective gear and training tailored to their specific requests. Consider setting up a security support hotline/website portal for this purpose.
- Support/underwrite national NGO and volunteer group schemes for self-insurance.

Humanitarian access and principles

- Focus more strongly on needs of civilians in Russian-held areas and alternatives for reaching them.
- Continue separate high-level discussions on negotiated access, bringing in political actors.
- Invest in local initiatives to build trust to improve cross-line aid supplies.

The bigger picture

Unlike most other humanitarian crises, the seismic geopolitical impact of Russia's attempted annexation of a sovereign nation makes Ukraine a focal point for international policy attention and action. This means it will not only draw greater sums of money and other resources for humanitarian response – already raising fears that this will come at the expense of other crises in the world – but also, paradoxically, that the international architecture for humanitarian action will play an even smaller role in the overall policy theatre than usual. It is important not to try to re-mould civil society into a humanitarian NGO model. Rather, international NGOs will need to change to adapt to different models and types of organisations and volunteers. As the larger and longer-term recovery support comes online, plans will need to be made to hand over humanitarian mechanisms to government before parallel systems become entrenched.

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[Note: This list does not include off-the-record consultations.]

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Victoria Babiy, Co-founder, Slavutich Tranzit, <https://www.facebook.com/slavutich.tranzit>

Halina Balabanova, Co-founder, Halabuda, <https://halabuda.org/>, <https://www.facebook.com/halabudavp>

Anastasia Bondarenko, Lawyer, Alliance Global, <http://ga.net.ua/en/>

Cherkasskiy Cherkasskiy, Founder, Ukraine TrustChain, <https://www.ukrainetrustchain.org/>

Alla Feschenko, Chair of the Board, Station Kharkiv, <https://station.kharkov.ua/>

Grigoriy Frolov, Co-founder, Head, Action Office https://actioninstitute.io/office/?fbclid=IwAR1Bgbx5FD5h-JIDz_vZ6SeiIzloy2JcAxx9mPsn49n2F9tsk4Oo7RdRT24Q

Olga Kosse, Chair of the Board, Responsible Citizens, <http://responsiblecitizens.org>

Yulia Krasynikova, Executive Director, East-SOS (Vostok-SOS), <https://vostok-sos.org/en/>

Daria Marchenko, Director, Dream Ukraine, www.dreamua.win/

Marina Morana, Chair, Mariupol Women Association 'Bereginya', <https://donbasforpeople.org/>

Inna Oliynik, Accountant, Spectra

Yulia Ryzhuk, Director, Nabutok, <http://nabutok.com.ua/>

Olga Skripnik, Chair, Crimean Human Rights Group, <https://crimeahrg.org/en/about/>

Olena Suslova, Founder, Women's Information Consultative Centre <http://www.wicc.net.ua/>

International organisations

Jim Arbogast, Senior Director, Crisis Analytics, Mercy Corps

Sally Austin, Head of Emergency Operations – CARE Emergency Group (CEG), CARE International

Araba Cole, Global Director, Safety and Security, IRC

Petr Drbohlav, Regional Director for the Eastern Partnership and the Balkans, People in Need

Hans van den Hoogen, Response Lead, Oxfam International

Moira Monacelli, Director of Operations, Caritas Internationalis

Jon Kennedy, Humanitarian Specialist, Tearfund UK

Michael Mosselmans, Humanitarian Director, Christian Aid

John O'Donoghue, Director, Development & Capacity Building (RISKREADY), Security Unit, CARE

Niall O'Rourke, Head of Humanitarian Affairs, ACT Alliance

Steve Ringel, Deputy Head of Humanitarian Aid, HEKS/EPER – Swiss Church Aid

Sandrine Tiller, MSF Liaison, MSF

Magnhild Vasset, Executive Director Field Operations, Norwegian Refugee Council

Rod Volway, Country Manager, International Medical Corps

Gabriella Waaijman, Global Humanitarian Director, Save the Children International

Robert Whelan, Adviser, Security and Crisis Management Support, ICRC

UN agencies

Emanuele Bruni, Health Cluster Coordinator, WHO

Peter Burcew, Field Security Officer, IOM

Laurent Dufour, Dnipro Field Team, OCHA

Manuel Fontaine, Director Emergency Programmes, UNICEF

Paul Von Kittlitz, Cash Coordination, WFP

Carla Lacerda, Consultant, WFP

Julian Morel, Multipurpose Cash Assistance Team Leader, UNHCR

Janet O'Callaghan, Chief, Field Information Services (FIS), Information Management Branch, OCHA

Donor governments

Nick Cox, Ukraine Response Management Team Response Manager, USAID/BHA/RMT

Representative, Global Affairs Canada (GAC)

Rachel Kessler, Senior Humanitarian Advisor, FCDO

Quentin Le Gallo, Regional Thematic Expert - Food Security, Cash Transfers & Basic Needs, ECHO

Jeremy Loveless, Humanitarian Adviser, FCDO

Louisa Medhurst, Senior Humanitarian Advisor – Ukraine, FCDO

Ben Pickering, Humanitarian Adviser, FCDO

Anne Shaw, Deputy Manager for Coordination, Ukraine Response Management Team. USAID/BHA

Clody Wright, Team Leader - Early Warning, Analysis and Reporting, FCDO

Samuel Tunfjord, Program Manager, Swedish International Development Cooperation Agency (Sida)

International consortia and independents

Martin Chatelet, NGO Coordination Focal Point – Ukraine, ICVA

Jenny Hodgson, Director, Global Fund for Community Foundations

Ellie Kemp, Head of Research Evidence and Advocacy, Clear Global

Oksana Kuzyshyn, COO, Canada-Ukraine Foundation

Frederic Larsson, ICVA

Louisa Seferis, Independent Consultant

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