

### OVERVIEW

Since 15 August 2021, when the Taliban seized Kabul, the context in which NGOs are operating in Afghanistan has changed. Widespread conflict has decreased, significantly improving humanitarian access in the country (ACAPS 07/07/2022). Overseas development assistance was immediately halted following the takeover, leading to increased humanitarian assistance that exceeded USD 2 billion for the first time (ACAPS 05/01/2023; OCHA accessed 30/01/2023).

As parts of the country have become more accessible to humanitarians, international responders have expanded their reach; one INGO noted that the best way to do so is to engage more local responders with better knowledge of the community and who can advise on programme design and implementation (INGO 29/11/2022). That said, the recent ban on women from working in NGOs will create new access issues, with both NNGOs and INGOs struggling to reach women and girls through male-only implementation.

Since 15 August 2021, some NNGOs have ceased to exist, especially those led by women (UN Women 03/12/2021). Many new NGOs have been registered, and they compete for funds and operating space (Coordination actor 21/11/2022). Much aid has shifted from long-term, multi-year development aid to short-term funding to meet immediate needs, although some multi-year humanitarian funding exists through the Afghanistan Humanitarian Fund (AHF) (Coordination actor and INGOs 21/11/2022; 29/11/2022; 30/11/2022). As a result, local organisations with previously long-term commitments to communities have had to shift their approach to short-term funding cycles and compete for available funds in a different environment.

In the humanitarian sector, localisation refers to deeper respect for and engagement with local and national responders in every phase of humanitarian activities, recognising the role they play in effective and accountable aid delivery (PI 14/01/2021; IFRC accessed 15/11/2022). The World Humanitarian Summit and the Global Compact for Refugees have strongly propounded localisation (Elkahlout et al. 31/03/2022). Many have come to use the term as shorthand to refer to efforts in increasing the effectiveness and efficiency of humanitarian aid by providing more support and funding to local and national responders.

There is no standard definition delineating the difference between local and national NGOs/civil society organisations (CSOs). For the purpose of this report, ACAPS follows IASC's definition, which pertains to "[n]ational NGOs/CSOs operating in the aid recipient country in

which they are headquartered, working in multiple subnational regions, and not affiliated to an international NGO" and "[l]ocal NGOs/CSOs operating in a specific, geographically defined, subnational area of an aid recipient country, without affiliation to an international NGO/CSO" (IASC 24/01/2018).

#### Purpose of the report

This report aims to develop a preliminary understanding of the different challenges that NNGOs face in Afghanistan, as identified through a review of existing literature and additional conversations with NNGOs, INGOs, and some coordination actors.

While comprehensive localisation comprises many dimensions, this report focuses on understanding the challenges that NNGOs face in the four most prevalent dimensions in Afghanistan: funding, partnership, coordination, and capacity-strengthening.

This report is not a comprehensive investigation of localisation in Afghanistan<sup>1</sup>.

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<sup>1</sup> Any comments or questions? Please contact us at aah@acaps.org



## METHODOLOGY

ACAPS carried out a review of 39 publicly available reports, followed by ten semi-structured conversations with national and international actors between 21 November and 19 December 2022 to encourage the active participation of responders and include an array of voices. Follow-up conversations were held between 15–24 January 2023, after the Taliban's ban on women working in NGOs, to understand the impact on the humanitarian response and potential implications on the localisation agenda.

In the first round of conversations, ACAPS spoke with three NNGOs working in 17 provinces, four INGOs, two coordination bodies, and a context expert.<sup>2</sup> Follow-up conversations were held with two of the INGOs and the same NNGOs, coordination bodies, and context expert. One of these interviews was conducted with a new actor with expertise on the subject.

The 17 provinces covered by the three NNGOs are Badghis, Baghlan, Balkh, Farah, Faryab, Ghor, Herat, Jowzjan, Kabul, Kandahar, Khost, Paktika, Samangan, Saripul, Takhar, Uruzgan, and Zabul.

## LIMITATIONS

The small number of conversations with different responders (NNGOs, INGOs, and coordination bodies) means that the findings cannot be generalised for the entire humanitarian response in Afghanistan, but they can form the basis for potential future areas of exploration and highlight where there may be differences in understanding between NNGOs, INGOs, and coordination systems in place.

ACAPS did not speak with local NGOs (LNGOs) or CSOs for this piece, so the findings of this report cannot be assumed to extend to LNGOs and CSOs who may have different needs and priorities. This scoping study focuses only on the experiences expressed by the NNGOs involved, all three of which are well established and have participated in or are currently participating in the Twinning Programme of the Agency Coordinating Body for Afghan Relief and Development (ACBAR).

ACAPS did not speak with individual UN agencies outside coordination mechanisms. As NNGOs noted that UN agencies make up their main partners and donors, this is a limitation of the report.

## KEY FINDINGS

- Partnership models vary, but NNGOs primarily function as implementing partners for international actors, primarily UN organisations.
- NNGOs rarely receive funding directly from donor countries, and passing the AHF's due diligence and partner capacity assessments is difficult.
- There is an apparent tension between donor commitment to support local humanitarian action and donor concerns about how money is used. Stringent donor compliance requirements are not fully adapted to the context and are a barrier to funding for NNGOs who struggle to fulfil the minimum requirements.
- National and international actors differed in some areas in understanding the challenges that NNGOs are facing.
- Although localisation should lead to those in closest proximity to a crisis deciding on the direction of a response, NNGOs feel that within the current system, they are not adequately involved in high-level decision-making about the direction of humanitarian response funding.
- Trust is an overarching issue for international actors, who are concerned about the lack of robust back-end systems and worry that NNGOs are more susceptible to pressure from local authorities.
- NNGOs identified a lack of decision-making power as one of the biggest challenges in partnering with international actors, along with the short-term nature of projects.
- NNGOs highlighted a lack of core funding as a major issue preventing them from maintaining operations when there are gaps in funding between projects. NNGOs funded through the AHF receive some core funding.
- A low appetite for risk (from donor countries, which carries down to clusters) means a small number of well-known NNGOs continue to receive more funding, while newer L/ NNGOs struggle to become established and build rapport and trust.
- All respondents agreed that the cycle of capacity-strengthening and the poaching of staff, where highly trained staff are hired from NNGOs to INGOs and the UN, are major challenges for NNGOs.
- ACBAR's Twinning Programme is overwhelmingly considered helpful and successful.
- More research about localisation in Afghanistan is needed from the perspective of LNGOs, CSOs, and NNGOs, as well as more critical explorations of what localisation in Afghanistan could look like moving forward.

<sup>1</sup> These dimensions include the participation of crisis-affected communities, funding and financing, capacity-strengthening, inclusion in coordination mechanisms, increased visibility, and the participation of local responders in developing policy (AAH et al. 30/06/2018).

<sup>2</sup> The names of the organisations and coordination bodies are not included both for conflict-sensitivity reasons and because anonymity was guaranteed to ensure open and honest conversations.



## SUGGESTIONS DRAWN FROM THE CONVERSATIONS

- For international responders to increase opportunities for small and developing L/NGOs to access funds by developing specific mechanisms targeted for this purpose and publicising existing mechanisms.
- For donor countries and contracting organisations (UN and INGOs) to publicly announce who receives funding and why, so those who do not secure funding can understand how they can improve their bids.
- To reduce the burden of writing funding proposals on NNGOs by allowing and actively encouraging integrated proposals covering multiple activities and sectors.
- For INGOs to introduce their local partners in clusters so local responders have an opportunity to make themselves known and build relationships.
- For more accessible and broadly publicised information on who is doing what and where, mapping all responders regardless of size and allowing smaller responders working in remote locations to better target unmet needs in a given area and work with partners already operating in that space.
- For NNGOs to receive more support from clusters to develop systems and structures to respond to demands from the Interim Taliban authority.
- For salary disparities between international and national organisations to be reduced to minimise staff turnover in local organisations.
- As per NNGOs, for the ACBAR Twinning Programme to be reduced from two years to 6–12 months.
- If the only way for women to reach women is by working with Taliban-approved NNGOs, for guidelines in working with such NGOs to be developed.

## THE TALIBAN BAN ON WOMEN WORKING IN NNGOS

On 24 December 2022, the Interim Taliban authority passed a directive effectively banning Afghan women from working in NGOs. A survey by UN Women found that immediately after the ban was announced, 94% of NNGOs fully or partially stopped operations. The directive hit NNGOs especially hard, with women making up between 50–55% of the staff of NNGOs surveyed by UN Women (UN Women 13/01/2023). The ban currently does not apply to women working for the UN. The Taliban are working on a guidance document to provide clarity on the roles and possibilities for women working in NGOs (Al Jazeera 25/01/2023).

Everyone who spoke with ACAPS for this report immediately suspended operations completely or partially. At the time of writing, some NNGOs and INGOs with health and

education programming had resumed operations, as the Interim Taliban authority had allowed women to partially resume work in these sectors, with conditions. Most other activities remained suspended (CARE 16/01/2023; Reuters 17/01/2023). An exemption for emergency response is currently being negotiated (Coordination actor 19/01/2023).

At the time of writing, there was no clarity as to whether the ban will be reversed upon commitment from humanitarians to adhere to Taliban policies, such as enforcing the separation of male and female staff and the Mahram (male guardian) requirement. That said, Afghans in Kabul are speaking about what comes next, not what may be reversed. The ban is unlikely to be fully lifted, but sector-specific and organisation-specific exemptions are being negotiated, and some authorities appear willing to relax or make exemptions to the ban (NNGOs 15/01/2023; 17/01/2023). Others have rolled back exemptions (Coordination actor 19/01/2023).

The ban will affect the localisation agenda, as this cannot be achieved without the participation of women. All organisations in Afghanistan rely on women to reach women and girls, because social norms restrict the ability of men to do so, especially in specific programming areas where women provide services for women and girls (protection, child protection, gender-based violence, menstrual hygiene management, mental health and psychosocial support, and more). The ban will also significantly affect safeguarding protocols, assessments, the ability to monitor the impact of aid, and the ability of humanitarians to reach women and girls in need of assistance (UN Women 12/01/2023).

If the ban is not reversed, many NNGOs will have to switch to male-only programming; those that cannot will have to close operations (NNGOs, INGOs, and coordination actors 15/01/2023; 17/01/2023). NNGOs said that the ban will reduce the number of people they can reach, likely also reducing the funding they can apply for. One INGO said that they are rethinking their localisation plans for 2023 because they will not engage in implementation activities that do not include women (INGO 24/01/2023).

There are fears that some new NNGOs have been formed by those affiliated with the Taliban, and INGOs are being pressured to work with them (INGO 19/12/2022). The ban on women working in NGOs and the subsequent temporary suspension of activities may result in more pressure for the international community to work with Taliban-affiliated NNGOs, to gain exemptions that will enable them to ensure an appropriate work environment for women.



## Funding

NNGOs rarely receive direct funding from donor countries. Instead, they function as implementing partners for INGOs and the UN. All three NNGOs ACAPS spoke with said that they are primarily funded by UN organisations, and two have acquired funding from INGOs. Only one has successfully received funding from the AHF, while another is preparing to apply. The third said that it tried acquiring funding from the AHF several times without success, leading them to stop applying altogether. None has received funding directly from donor countries, almost none of which have a physical presence in Afghanistan, and direct funding through other means was not mentioned.

The AHF is a country-based pooled fund under the authority of the Humanitarian Coordinator. Established in 2014 to enable swift and strategic humanitarian action in Afghanistan, it is designed to allocate available funds to the most critical humanitarian needs to enable an efficient and rapid response to emergencies. Funds can be allocated to NNGOs, INGOs, and UN agencies for humanitarian projects responding to the needs identified in the Humanitarian Response Plan.

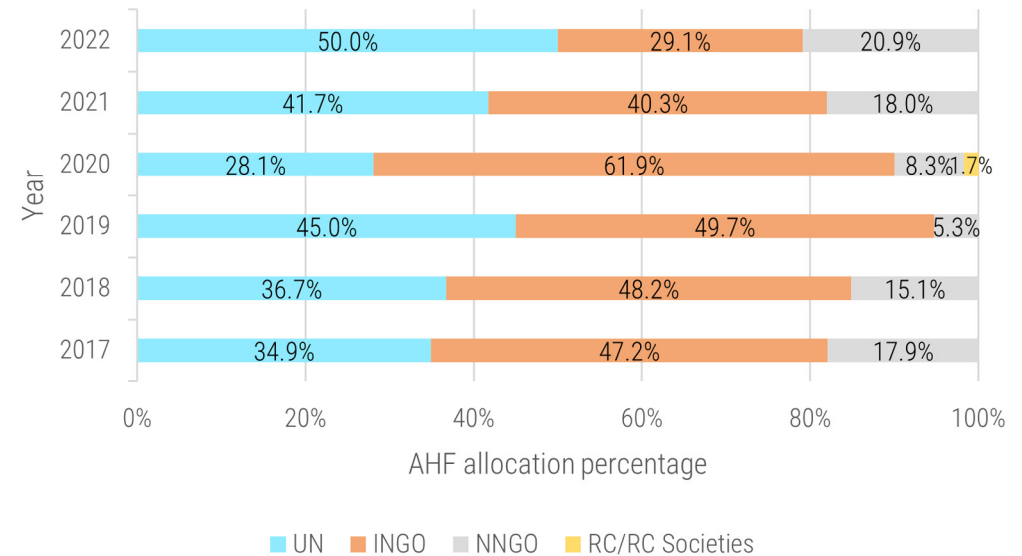
All the INGOs ACAPS spoke with considered the AHF to be one of the main funding channels for NNGOs, and they all emphasised its importance in localisation.

Data from the AHF shows that the proportion of direct funding allocated to NNGOs is significantly lower than that allocated to INGOs and UN agencies. Reasons for this include the following:

- LNGOs and smaller NNGOs are unaware of pooled funds (COAR 11/12/2019).
- Local responders do not feel that there is enough flexibility when it comes to using pooled funds (HPG 03/06/2021; COAR 11/12/2019).
- NNGOs face challenges in meeting the AHF's due diligence requirements and other requirements to prove their internal capacity to manage grants (ICVA 10/03/2022).

Despite this, the proportion of funding that the AHF allocated to NNGOs more than doubled in 2021 compared to 2020. The total allocation of funds for the AHF also increased from USD 44.9 million in 2017 to USD 165.6 million in 2021, meaning NNGOs received significantly more money in absolute terms (AHF 2017 and 21/06/2021).

## AHF allocations by partner type



Source: OCHA (accessed 25/01/2023)

**National and international responders expressed different understandings about the main challenges that NNGOs face to obtain funding.** After the Taliban's return to power, funding for development activities shifted to the humanitarian sector, and the humanitarian response in Afghanistan received significantly more funding in 2022 than in previous years (OCHA accessed 22/12/2022; CHA 19/10/2021; ACAPS 05/01/2023). One INGO suggested that there is a sense that donors are less willing to directly fund local responders (INGO 29/11/2022). Part of the reason is they do not have an in-country presence and cannot monitor the NNGOs who would receive direct funding from them, but the reluctance is also possibly because of rumours that new organisations may be linked to the Taliban, and donors are unable to vet them properly.



FUNDING CHALLENGES THAT NNGOS FACE, AS EXPRESSED BY NNGOS	FUNDING CHALLENGES THAT NNGOS FACE, AS EXPRESSED BY INTERNATIONAL RESPONDERS
Dependence on INGOs and the UN as a source of funding	Lack of back-end structures (finance, procurement, and organisational policies) to fulfil due diligence requirements
Lack of transparency regarding who is/is not selected for funding and why	Poorly expressed strategic direction or poorly executed fundraising strategy (reflecting poor understanding of current humanitarian systems and infrastructure)
Lack of core funding	Difficulty writing humanitarian proposals using donor language
Requests for bribes or a percentage of a contract to secure funding	Poaching of staff who develop strong skill sets from NNGOs to INGOs and the UN for higher salaries
Insufficient track record and direct trust-based relationships with donors (for smaller NNGOs)	Engagement across too many sectors, meaning the inability to become well known for strong implementation in one sector
	Lack of visibility and limited engagement in coordination systems
<b>Agreed-upon challenges</b>	
Stringent donor compliance regulations and procedures that are not fully adapted to the current context or that NNGOs cannot fulfil	

NNGOs said that the lack of core funding means that they run on a project-by-project basis and must always be looking for the next funding opportunity (NNGOs 21/11/2022; 22/11/2022). Such a situation affects their ability to develop effective strategic plans. The ban on women from working in NGOs has worsened difficulties around the lack of core funding, with NNGOs suspending operations because of their international partners also doing so and because the lack of core funding means they are unable to implement activities of their own. Most of the suspended activities targeted women and female-headed households and were primarily conducted by female staff. One NNGO also said that they expect the ban on women working to result in a decrease in funding opportunities because they will have to serve fewer people (only men and boys), meaning they will be taking on smaller projects with less staff. They expect that in the long run, this will affect the localisation agenda and will have a devastating effect on the Afghan economy (NNGO 15/01/2023).

Fundraising is another major issue. NNGOs said that the lack of clarity about why certain NNGOs receive funding while others do not means that they cannot easily identify why their proposal applications failed and how they can improve (NNGO 22/11/2022). One coordination

body said that they have offered to review proposals to help tailor the language to the international humanitarian system, but no NNGO has sought their support (Coordination actor 21/11/2022). On the other hand, NNGOs who spoke with ACAPS said that fundraising, not proposal writing, is where they need support (see section on capacity below). This indicates a difference between the understanding that international responders and NNGOs have of what constitutes the most important elements of fundraising and highlights that NNGOs still lack clarity as to why they are not successful in securing funding.

Reduced bureaucracy and improved transparency around fundraising have been previously recommended (ICVA 10/03/2022). Effective localisation requires a shift in how humanitarian funding systems work, and the need for long-term and core funding has been written about. Achieving this requires a willingness to cede some control and demand as much accountability and transparency from communities as donors (Midgley et al. 17/06/2022).

The lack of visibility is another issue affecting NNGOs. One coordination body said that NNGOs become more active during periods when funding is available, but they do not consistently engage with international responders otherwise. This could in part be because of the challenges that NNGOs face in-between projects, including a lack of resources (including to attend meetings online or in person), language barriers, and staffing shortages (HPG 03/06/2021). Another reason may be that NNGOs do not always see value in these structures (INGO 19/12/2022).

There appears to be tension between donor commitment to supporting local humanitarian action and fear that doing so may expose them to reputational or fiduciary risk. Donor appetite for such risk is low, and existing systems encourage risk aversion (Midgley et al. 17/06/2022). In Afghanistan, this means a small number of well-known NNGOs continue to receive much funding directed to national responders, while newer L/NNGOs struggle to become established and build rapport and trust with donors, especially if they do not have a history of implementing programmes with relatively large budgets. This is likely to be aggravated by the fact that many newer L/NNGOs may have strong links to the Taliban.

## Capacity

Capacity-strengthening is one of the Grand Bargain commitments, but it has suffered from a lack of systematic investment or good-quality capacity-strengthening interventions (HPG 22/10/2019). The current approach to capacity-strengthening is problematic, as it is often based on a narrow interpretation of capacity that prioritises Western-emphasised skill sets. In the humanitarian sector, this includes compliance with donor systems (Midgley et al. 17/06/2022).



CAPACITY-STRENGTHENING NEEDS OF NNGOS, ACCORDING TO NNGOS	CAPACITY-STRENGTHENING NEEDS OF NNGOS, ACCORDING TO INGOs
Fundraising	Proposal-writing
Technology and capacity to use technology effectively	Programming, management, and administration capacity
	Financial management and reporting
	Understanding donor language
	Brain drain of qualified humanitarian staff who left the country after August 2021
<b>Agreed-upon challenges</b>	
Short project lengths	
Poaching of highly trained and capable staff from NNGOs, resulting in a constant cycle of capacity-strengthening	

All the international actors who spoke with ACAPS noted that NNGOs know the context and understand the community better, meaning they develop strong ideas for the humanitarian response. The problem is that they struggle to translate this effectively into proposals and lack back-end structures (finance, procurement, and organisational policies) to be able to put such concepts into action.

One INGO said that if an NNGO presents a strong plan, INGOs should try to work around existing donor requirements and partner with them to move that plan forward, but this rarely happens because of strict due diligence requirements. The same INGO said that international actors assume that local responders need capacity-strengthening while disregarding that international actors have a lot to learn from local responders, especially in terms of adapting programmes to specific community needs (INGO 29/11/2022).

NNGOs told ACAPS that they need access to technology and capacity-strengthening in using such technology (NNGOs 21/11/2022; 22/11/2022). A striking difference in the use of technology between local and international actors was seen during the COVID-19 pandemic, where local and national organisations in remote areas could not participate in coordination forums because of electricity blackouts, poor internet and mobile networks, and poor technological resources (HPG 03/06/2021).

## ACBAR Twinning Programme

Since 2015, ACBAR has facilitated a Humanitarian Twinning Programme that partners INGOs with NNGOs for mentoring, training, and cooperation. The programme has supported national organisations to develop management structures and controls that make them eligible for direct funding through the AHF (OCHA 31/03/2018). The programme has continued to run since 15 August 2021.

All three NNGOs who spoke with ACAPS were part of the ACBAR Twinning Programme. Two said that the programme was very effective and helped them develop policies and receive funding from the AHF, while one said that the programme was not, as they still failed to secure direct funding after participating. One NNGO noted that the Twinning Programme has allowed participating NNGOs to play an advisory role to other NNGOs who require capacity-strengthening. NNGOs in the programme work to support other NNGOs so they too can pass the AHF's due diligence and capacity assessment criteria (NNGO 22/11/2022).

None of the international responders ACAPS spoke with were directly involved in the Twinning Programme, but all were aware of it and most believed it to be effective.

## Partnerships

Partnership models vary across organisations, but for the most part, international actors (primarily the UN but also INGOs) provide funding, and NNGOs implement the activities (ICVA 10/03/2022). All the NNGOs who spoke with ACAPS said that they had long-established, implementation-style partnerships with the UN, and all said that most decision-making about where to allocate funding is done by international responders, donors, or the UN.

The power dynamics between funder (international) and implementer (national) affect the ability of NNGOs to influence project design and operational strategy. Only one of the three NNGOs said that they are a strategic partner and are entrusted with leading projects and disseminating funds to other local responders (NNGO 21/11/2022). This NNGO said that clusters, INGOs, and UN agencies hold consultation sessions on programme-planning, where they can proactively engage and feel heard.

INGOs differed on whether partnerships with NNGOs are actively encouraged by donors. They said that donors sometimes insist on consortiums comprising both national and international responders (INGOs 21/11/2022). When this is the case, INGOs try to work with a range of NNGOs on each consortium to give as many NNGOs as possible the opportunity to engage. Such partnerships also follow the funder-implementer model, where international actors lead and oversee reporting and donor engagement while NNGOs implement activities (INGOs 21/11/2022; 29/11/2022).



Coordination bodies said that they believe NNGOs currently prefer partnering with UN agencies over INGOs, because they feel that the UN is better placed to support them if they face difficulties with the Interim Taliban authority (Coordination actor 30/11/2022). The NNGOs did not explicitly note this but did list more UN agencies than INGOs as sources of funding or partners.

Two INGOs said that their organisation is increasing the advisory role of NNGOs because of their context knowledge and ability to help programmes become more inclusive (INGOs 29/11/2022; 19/12/2022). One also said that since the Taliban's return to power, they have shifted the focus of their partnership approach from funding and implementation to capacity-strengthening. This was done to reduce operational risk for themselves and their local partners given the pressure that NNGOs face from the Interim Taliban authority in beneficiary-selection and the hiring of recommended candidates (INGO 29/11/2022; ICVA 10/03/2022). One INGO said that the ban on women working in NGOs may require a shift in their own localisation plan; if NNGOs proceed to implement male-only activities, they will limit their partnerships to workshops and capacity-strengthening because they will not enter into implementation activities that do not include women (INGO 24/01/2023).

One INGO said that to address some of the challenges being faced, some donors are encouraging the posting of more international staff to mitigate current and potential pressure (including but not limited to threats) exerted on national staff. Hiring more international staff is not only expensive but also risks affecting aid delivery, as less experienced humanitarians with little knowledge of the context take on lower-paying positions with the goal of gaining 'experience'. It also does not address the fact that much of the pressure exerted on Afghans working for NGOs or the UN occurs outside the workspace, and the hiring of more international staff does not guarantee protection (INGO 19/12/2022).

PARTNERSHIP CHALLENGES, ACCORDING TO NNGOS	PARTNERSHIP CHALLENGES, ACCORDING TO INGOs
Lack of decision-making power	Lack of trust, especially for INGOs with previously negative partnership experiences
Short-term length of humanitarian projects	NNGOs' lack of transparent financial, administrative, and procurement systems
	Fear that NNGOs are more susceptible to pressure from local authorities
<b>Agreed-upon challenges</b>	
Lack of core funding	
Poaching of highly trained and capable staff from NNGOs, resulting in a constant cycle of capacity-strengthening	

In the conversations ACAPS had with the NNGOs, they said that they take on more risk for less cost, in part a result of pressure on local organisations to prove their legitimacy by showing that they can deliver better, cheaper, and more effective humanitarian aid than international responders (NNGO 21/11/2022; HPG 22/10/2019). On the other hand, NNGOs also said that their context knowledge allows them to better mitigate or tackle risks (NNGOs 21/11/2022). The temporary suspension of aid after the 24 December 2022 ban on women working in NGOs placed NNGOs at higher risk of losing community support, with communities asking them to explain why they are suspending operations (NNGOs and INGOs 15/01/2023; 17/01/2023).

## Coordination

All the NNGOs that ACAPS spoke with actively participate in the cluster system and are members of ACBAR. Smaller NNGOs and those based in remote locations are less involved in the cluster system, if at all. One coordination body said that active participation in the cluster system allows international actors to get to know NNGOs and their work. A lack of engagement can result in bias towards funding better-known NNGOs, who are more active in existing humanitarian coordination forums (Coordination actor 21/11/2022).

Most clusters are chaired and co-chaired by international responders (UN and INGOs). NNGOs can apply to be part of the Strategic Advisory Group. That international responders lead most humanitarian coordination forums contributes to the power imbalance between national and international responders (HPG 03/06/2021). Not all of the NNGOs who spoke with ACAPS found the cluster system effective, with the usefulness of a cluster attributed to the cluster coordinator (NNGO 22/11/2022).

NNGOs tend to have fewer resources than INGOs and UN agencies, meaning they have less administrative and management capacity. They are more reliant on an effective cluster system to provide coordination and guidance than INGOs or the UN. One NNGO said that they expect clusters to help avoid duplication in programming by keeping all responders informed of what activities are taking place in which areas (NNGO 22/11/2022). Because cluster data is compiled through voluntary responses from operational responders, it does not always provide a full picture of the relevant humanitarian operations. NGO distribution across the country is also disproportional, with some regions saturated with humanitarian responders while others have a limited humanitarian presence (ODI 11/2020).

All the NNGOs said that they want more support from clusters for help in developing systems and structures to respond to the demands of the new authorities, especially as NNGOs are more likely to be on the receiving end of additional demands, harassment, or even threats from low-level government officials. NNGOs also said that they would like ACBAR to do more to coordinate between national and international responders (NNGOs 21/11/2022; 22/11/2022).