

Practice Paper 2025

## Intermediary Agencies & Locally Led Humanitarian Action

### SUMMARY

Charter for Change supports the calls by others for a more diverse ecosystem of intermediary agencies and funding channels, including 'local intermediaries' and partnerships between local and national actors and International NGOs that adhere to clear equitable partnership practices and meaningfully shift leadership to local and national partners. This paper seeks to inspire change by providing a collection of good practice examples from across Charter for Change signatories and endorsers showing what can be done to enhance the roles of intermediary.

Three priorities based on our experience and good practices documented here:

1. **The 'local intermediary' model:** a national actor becomes the intermediary; channelling funding and wider support to a broader network of local and national actors in their context. INGOs can provide technical, compliance or capacity-strengthening support but cede financial management to the local and national actors.
2. **Meaningful practices of power shifting and co-leadership:** Promote intermediary agency models that work towards increased local and national actors' (LNAs) direct access to funding, grant management and programme management, such as through Prime Switch, Consortium Co-Leadership, Remote and Embedded Surge or Technical Support roles.
3. **Accountability and Advocacy:** Hold intermediary agencies accountable for equitable partnership and local leadership including in design and decision-making on proposals and programmes; partnership approaches to risk management ('risk-sharing') and duty of care; tracking and reporting of funding to LNAs; consistent, fair overheads/ICR support; reflection on partnership quality including channels for LNAs to reflect meaningfully with donors.

### BACKGROUND

In the face of global aid cuts and wider political attacks on principled humanitarian action, how can International NGOs (INGOs) or other international humanitarian agencies adapt and respond? An important part of this conversation is how should INGOs evolve in the 'intermediary agency' role that they play in funding and wider partnerships with local and national actors (LNAs)? The original mandate of Charter4Change (C4C) as a network has been to drive change in INGO partnerships with LNAs to promote more locally led and equitable humanitarian response. As international humanitarian capacity shrinks, the roles of LNAs also come more to the fore, and it is recognised that LNAs can also act as intermediaries, and this should be reinforced.

This paper seeks to inspire change by providing a collection of best practice examples from across C4C signatories and endorsers showing what can be done to enhance the roles of intermediary agencies - local and international. It documents models of equitable partnership and support to local leadership in humanitarian action by intermediaries. This paper is not exhaustive. There are other important roles that INGOs can and do play; for example in advocacy to address the root causes of crises in the Global North; or in building public support for humanitarian aid. INGO roles are wider than the intermediary function.

An important 'health warning' that C4C members want to highlight is that many intermediary agencies have learned to 'talk the talk' of localisation since the World Humanitarian Summit, and generate glossy reports, PowerPoints and speeches about localisation. Some UN-led coordination processes have issued 'localisation vision statements', and some INGOs have rebranded sub-granting mechanisms as 'local responder funds'. But not all these 'visions' or 'funds' amount to genuine or transformative changes in their practices. In fact, publicly available data suggests that since 2016, [donors have increasingly channelled funding to multilateral institutions](#), which often follow a more transactional partnership model, rather than supporting intermediaries working in a more transformative way. It is important that both donors and other stakeholders recognise that not all intermediary agencies are the same and to highlight good practices and encourage these. Otherwise, donors will inevitably continue to channel all funds through those big intermediaries set up to manage and mirror donor compliance and reporting requirements but not focused on equitable partnership or local leadership.

## 1. PROMOTE THE LOCAL INTERMEDIARY MODEL

The term 'local intermediary' was first put forward by C4C national NGO endorsers in Myanmar, who founded a network to promote good practices in this model. The concept links to the Grand Bargain commitment to increase direct funding to LNAs, rather than taking on a sub-grantee role on programmes and strategies led by international agencies. Several national NGOs already act as 'local intermediaries'. Reflection in the C4C capacity-strengthening working-group and evaluations by external actors point to how INGO intermediaries can play important roles in supporting 'local intermediaries'; especially through longer-term partnerships, accompaniment and investment in institutional capacity-strengthening which is genuinely owned and led by the local partner respecting and reinforcing their leadership and capacity.

The basic concept is that a national actor becomes the intermediary; channelling funding and wider support to a broader network of LNAs in their context. INGOs can and do provide technical, compliance or capacity-strengthening support but cede financial management to the LNA.

*Example of local actor network coordinating local intermediary policies and practices at country-level:* In one conflict-affected context, a group of over ten national NGOs that have already attained the 'local intermediary' status have founded a platform to coordinate between themselves both on an advocacy and a programmatic basis. The members of that network collectively manage a significant scale of programming (over \$60 million), which is equal or greater than many INGOs and UN agencies in the context. In addition, their access and reach to affected communities vastly exceeds that of most international agencies. The network is also establishing ambitious collective targets on any funding that they cascade onto other national/local actors so they can demonstrate the cost/benefit of working through local intermediaries. Part of the network's efforts have focused on shaping aligned best practice for 'local intermediaries' - including on decentralised decision making, sub-granting protocols and simplified systems that are central to fostering relevant, adaptable, timely and cost-effective localised humanitarian responses.

***Example of INGO supporting local intermediaries:*** CAFOD has adopted corporate-level Key Performance Indicators on 'Partner Direct Access to Funding' tracking both the number of partner-led proposals supported and the aggregate value of those secured. Progress is reported to CAFOD's board of trustees, which includes LNA partners, to help catalyse a wider reflection on support to local leadership, agency and voice. CAFOD's model of supporting [LNA-led and owned capacity strengthening](#), developed also through mutual learning with LNA partners, has inspired wider change in the INGO sector going back to the DFID-funded [Shifting The Power](#) consortium (1997-2020) in which CAFOD encouraged the consortium to establish LNA co-leadership in decision-making at all levels. The method centres ownership and self-assessment by the LNA partner and a holistic institutional approach, rather than a top-down imposition of training or INGO-led assessment. With this support, CAFOD's LNA partners in multiple contexts have transitioned from accessing funding as sub-grantees of CAFOD to becoming the 'prime' managing the grant; with CAFOD stepping back into a support role or exiting. Since tracking the grants in which CAFOD plays a support role, it has supported partners in over fifteen contexts to access direct funding. Examples include LNAs in DRC, Syria, Myanmar and elsewhere with a multi-million dollar scale of programming and budgets that vastly exceed CAFOD's own budget in the context, and who have gone on to extend local-to-local capacity-sharing with other LNAs.

## **2. PROMOTE INTERMEDIARY AGENCY MODELS THAT WORK TOWARDS INCREASED LNA DIRECT ACCESS TO FUNDING, AND LEADERSHIP IN GRANT AND PROGRAMME MANAGEMENT**

***'Prime Switch':*** The concept of 'Prime Switch' is that INGOs should work, when their local partners want to, towards switching the lead role in grant management from the INGO onto the LNA partner(s). The practice of 'Prime Switch' addresses the challenge that even after years of partnership and building up the required track record to be eligible for direct funding, intermediaries don't support LNAs to 'graduate' from the junior sub-grantee to the lead 'prime' role. Several C4C INGO signatories and national NGO endorsers started to practice 'prime switch'. CRS, for example, can track that its LNA partners have accessed over 80 million USD in direct funding with support from their EMPOWER programme. Oxfam has facilitated and handed over direct funding relationships for the Nexus Consortium in Somalia with Swiss and Dutch donors. Donors could factor 'prime switch' into their funding structures, encouraging a rotation of the prime role across project cycles. INGOs could adopt clear objectives and methods to enable that shift too.

***Experience of CEFORD, a national NGO in Uganda:*** In 2021, CEFORD played the lead role in a consortium involving INGOs (ICCO and HEKS/EPER) focused on livelihood intervention funded by the Dutch Innovation Fund. Previously, CEFORD had an ongoing intervention in which HEKS was the lead, and when another call for proposals was announced, HEKS encouraged CEFORD to take on the lead role. This created a reciprocal relationship: while CEFORD was reporting to HEKS on one project, HEKS and ICCO were reporting to CEFORD on another.

***Example from CARE's partnership with women-led organisations:*** CAFI is a consortium funded by the German Federal Foreign Office and led by CARE Germany in partnership with nine Women-Led Organizations (WLOs) across Niger, Mali, DRC, Lebanon, Iraq, Jordan, Ukraine, Colombia, and Venezuela. A core principle of CAFI is progressive transfer of leadership and resources to WLO partners. While CARE acts as prime for contracting purposes (contract holder), WLOs have been central in decision-making through a jointly governed Project Steering Committee. Importantly, several CAFI partners have now secured direct funding from institutional donors because of their increased visibility and strengthened capacity during the project. This gradual shift in power and resources is enabling WLOs not only to lead GBV programming in their contexts but also to act as co-leaders in international advocacy spaces and decision-making structures.

**Consortium or Programme Co-Leadership Model:** Consortia, partnerships and programmes that are designed and governed through co-leadership or leadership by the LNA partners can make important contributions. Over the past decade, there has been a process of iterative learning both within and across NGO consortia; with C4C members – INGO and LNA – playing lead roles in the NGO sector in designing, implementing and generating learning from them. From early examples, like the DFID-funded 'Shifting The Power' consortium (1997-2020) to current examples like the Start Network, Dutch Relief Alliance (DRA) and the German government-funded TOGETHER consortium, each have expanded the ways that leadership, decision-making authority, and budgetary control are shared with and increasingly led by different LNA partners. For example, Oxfam has several networked response models or consortia models such as the Asal Humanitarian Network in Kenya, the Nexus Platform in Somalia or the Durable Peace Programme in Myanmar. In these models Oxfam often plays the role of fund holder and technical assistance, but not the decision-maker on funding allocations, capacity strengthening approaches, programme priorities or strategic direction. One key learning is that donors and INGOs should ensure LNA involvement through co-creation at design stage and encourage for learning and improvements during inception and later stages to maximise equitable partnership and local leadership; for example in how steering committees at global and country levels implement this.

**Example from Pak Mission Society, a national NGO in Pakistan:** Pak Mission Society (PMS)'s experience with a German INGO called Humedica International since 2011, with back donor funding from BMZ and GFFO, provides a good practice example of an INGO intermediary working in a way that centres leadership by the NNGO partner. PMS describe being able to lead processes, like project development with support from Humedica. Humedica and PMS jointly conduct regular capacity assessments. For example when PMS pitched a rehabilitation project after flooding and requested 1.8 million euro – Humedica contracted a consultant to work with and strengthen PMS systems. From the PMS perspective, the mutual approach is key – for example during CHS assessment - to encourage improvement and growth. Humedica do not have a country office in Pakistan, they manage from Germany, and visit to support which creates more flexibility and reduces operational costs. As a result, more than 90% of the project costs go to local partners directly.

**Example of Dutch Relief Alliance:** The Dutch Relief Alliance is a partnership between Dutch MFA and an alliance of 14 Dutch NGOs working with local partners in 3-year flexible humanitarian 'joint responses' in 8 countries in protracted crisis. Although the DRA started with all INGO leadership across its joint responses at the outset, two joint responses have now established co-leadership by an LNAs and the six other joint responses have established good practises of participation by LNA partners in decision-making structures. Work is on-going to deepen LNA co-leadership using different modalities; both individual co-leads and collective group co-leadership. At global level, the DRA has a local advisory group ('LAG') consisting of LNA representatives elected by LNAs in the country-level joint responses. The LAG has the mandate to table agenda items, advise and participate in meetings with the DRA INGO board and Dutch MFA. For example, LNAs in the LAG advocated for a shift of capacity development budget, formerly held by the DRA INGO members working with their partners, to being held within the LNA's own budgets to strengthen their ownership and lead of their capacity strengthening efforts.

**Remote and Embedded Surge and Technical Support Model** A number of C4C INGO signatories – including CAFOD, Christian Aid, NCA, Dan Church Aid and others – and diaspora networks and organisations do not always work through establishing country offices at the country-level but instead work through a mix of remote support and embedding staff in their LNA partners. This can span both surge support in rapid on-set crises, and longer-term secondments in areas like procurement, technical expertise, advocacy, financial and grant management and reporting tasks. For

example, CAFOD and Trocaire have given support to LNA partners on domestic resource mobilisation, with Trocaire recently investing in partner scoping of micro social enterprise as a viable approach to funding diversification.

Example from Norwegian People's Aid (NPA): NPA operates in Syria, Ukraine, Myanmar, Sudan, Palestine and other contexts through partnerships designed as co-leadership basis, not as subcontracting. LNA partners play a central role in project and programme design, including selection of geographic areas of intervention, priorities and implementation strategies. Decision-making structures are deliberately collaborative, with decisions made jointly via dialogue and with transparency about internal processes so that partner's voices carry equivalent weight in guiding interventions. As part of this, to adhere to commitments of transparency and equitable resource sharing, budget negotiations are undertaken with a clear focus on equitable distribution, including fair overheads and cost recovery for local partners, enabling them to strengthen their own institutional capacity alongside programme delivery. NPA assumes responsibility for providing technical support on donor compliance and risk management as well as thematic advice, but without displacing the leadership of local partners in programme design and delivery. This balance allows national actors to engage with donors with complex compliance expectations while ensuring they retain autonomy.

Examples from Sudan: In Sudan, several C4C INGO signatories have partnered with mutual aid groups and emergency response rooms, which have included a broad range of methods of support which have included accompaniment, remote mentoring and back-stopping. Efforts have included procurement support, advocacy and networking and support with HR, security and cash mechanisms. For example, Norwegian People's Aid has established a remote model of support to Sudanese partners that has included a broad range of technical support based on the needs and prioritised requested by partners to ensure their humanitarian responses can continue in challenging circumstances. Diaspora networks also play a critical remote support role by mobilising resources (cash and in-kind contributions) remotely, as well as providing technical assistance, back-end support, advocacy, and capacity-sharing (IDS, 2025; Shabaka 2024a, 2024c, 2023a, 2023b). For example the [Academy of Medical Education during Conflicts \(AMEC\)](#) was established by networks of diaspora medical professionals and has worked with diaspora partners such as the [Sudanese American Medical Association](#) to deliver remote medical training to doctors and medical students in Sudan who have been displaced by the crisis, as well as conducting medical missions in Sudan and on its borders.

### 3. HOLD INTERMEDIARY AGENCIES ACCOUNTABLE FOR EQUITABLE PARTNERSHIP AND LOCAL LEADERSHIP

The [Grand Bargain Caucus on Intermediaries](#) outlines many key issues to improve intermediaries policies and performance in relation to local actors such as risk management ('risk-sharing'); tracking and reporting of funding to LNAs; 360 feedback; consistent, fair overheads/ICR; reflection on partnership quality including channels for LNAs to reflect meaningfully with donors and shifting individual staff attitudes and behaviours, and organisational culture. C4C members played lead roles in advocacy to secure that Caucus and continue to advocate for progress in the Grand Bargain Subgroup on Intermediaries.

Some donors and intermediaries have started to take action. For example, the Danish Ministry of Foreign Affairs requires its Strategic Partnership Agreement partners to develop a local leadership strategy and report on this in all their reports. Similarly, ECHO's 2023 "Promoting Equitable Partnerships with Local Responders in Humanitarian Settings" report prioritizes proposals allocating at least 25% of EU contributions to LNAs. Partners must indicate fund allocation to local actors and

justify if it falls below 25%, while also promoting fair overhead cost distribution. Such requirements hold agencies accountable and incentivize stronger, more equitable partnerships with local actors.

*INGO example:* Dan Church Aid (DCA) has established a [DCA Partnership Policy](#), including an updated Localisation and Local Leadership Strategy currently being finalised. Linked to this, DCA has established a Global Partner Group comprised of representatives of DCA's partners globally, which advises the DCA Board. In addition, DCA carries out an annual Partner Satisfaction Survey and seeks anonymous input from partners as to DCA's progress and performance as an equitable partner. In the 2024 Partner Satisfaction Survey, DCA partners reported an overall satisfaction score of 90% across all measured components, up from 86% in 2023. Exchange between INGOs through C4C working-groups and the global annual meeting has shared learning and inspired others to take action. For example, more recently Islamic Relief launched the [Forum for Partnerships Excellence](#) in July 2025, and reports having acted on several priorities raised by partners in that space (eg reviewing the agency's partnership agreements, programme decision-making processes and feedback mechanisms).

*Examples of country-level peer reflection processes:* C4C national NGO endorsers have led various processes at the country-level to convene annual peer-to-peer review, dialogue and reflection processes to foster accountability for equitable partnership. These processes have been linked to dissemination and dialogue around the annual C4C global report synthesising the self-reports by C4C INGO signatories against their delivery on the C4C Charter and wider localisation commitments. In several contexts, such as South Sudan and Kenya, this has led to interest in exploring ways to implement a 'scorecard' at the country-level to track progress by C4C INGO signatories and others. C4C INGO country offices have also shared their country-specific C4C self-reports and used these as a basis for dialogue with C4C national NGO endorsers and others. In Ukraine and DRC, C4C national NGO endorsers have worked with others to implement country-level surveys of LNAs to generate more in-depth contextual insights on key challenges and ways forward. For example, in DRC, a Localisation Barometer has been piloted under CONAFOHD, the national NGO network. In Myanmar, a LNA network has established a 'Local Perceptions of Partnership Index' that three INGO intermediaries and three LNA intermediaries are piloting with their LNA partners.

*Overheads Costs* - Of the 46 INGO signatories to C4C, 18 INGOs reported this year that they have established clear policies about how they avail ICR/overheads to LNA partners, and 14 INGOs have not yet done so. For example, Christian Aid's policy is to share ICR received from donors at 50% with partners, and where funding is unrestricted, ensure 10% ICR for partners. Checks to institutionalise the policy have been established with the finance team, as well as improved the coding in the agency's systems to track implementation. In addition, in 2024 the agency updated its partner capacity policy to promote budgeting for capacity, in addition to ICR, which promotes increased provision of core and flexible funding to LNA partners. Another C4C INGO signatory, Oxfam, co-led the Inter-Agency Standing Committee's (IASC) work on Overhead Cost Allocation with local actors, with UNICEF, which involved [detailed research and guidance development](#). Since the guidance was agreed at IASC, several UN-Agencies and INGOs have revised or passed policies and guidance in their institutions increasing ICR/Overheads for local partners. CAFOD, a C4C INGO signatory, and the Alliance of Ukrainian CSOs, a C4C LNA member network, are co-leads alongside Switzerland of the Grand Bargain Subgroup on Intermediaries, which is convening discussions between donors, UN, INGOs and LNAs on how to progress change on ICR/overheads by intermediary agencies. C4C INGO signatories have also been engaging bilaterally with back-donors (government and philanthropic) in the UK, Norway, Australia and elsewhere to clarify and improve their policies on ICR/overheads to LNA partners.



*Risk Sharing and Duty of Care:* C4C members, including LNA endorsers from Nigeria, Myanmar and Syria, CAFOD and CORDAID organised the first [high-level discussion](#) to engage Grand Bargain signatories on how Risk Sharing should engage and benefit LNAs, not just international agencies. C4C members have also contributed to subsequent efforts to pilot the Risk Sharing Framework. For example, Dutch INGOs involved in the Dutch Relief Alliance (DRA) have rolled it out in three country level that joint responses, in which some partners said it was the first time they had an open discussion with the INGO or donor; leading to more trust and openness on the real risks they face. Consequently, there have been examples of risks materialising in specific contexts and the costs of these being negotiated and shared in a more equitable fashion between all involved.

*INGOs acting on loss absorption:* CARE, CAFOD and Christian Aid are amongst the C4C INGO signatories that regularly take on loss absorption to support LNA partners, when back-donors are unwilling to cover the costs of losses incurred due to conflict or other unavoidable impacts on their work. For example, Christian Aid shared examples from Ukraine, Syria and Haiti when warehouses were destroyed by conflict or disasters and donors would not cover the loss. Likewise, these INGOs report having frequently absorbed foreign exchange losses, and agreeing to cover heightened financial service provider fees in contexts where alternative payment (non-bank) routes increase transaction costs and donors have capped the amount they would pay for these fees.

*LNA innovation on Duty of Care:* The Alliance of Ukrainian CSOs, Basmeh and Zeitooneh Syria and HAI India are examples of C4C LNA endorsers promoting innovation on Duty of Care. Despite the differences across their contexts, many common challenges are found in terms of the fragmented, underfunded and inadequate support to LNAs and LNA staff on Duty of Care. In Ukraine, for example, the Alliance is engaging with donors, the Humanitarian Country Team (HCT), humanitarian agencies and the Ukrainian government to formalize and fund a 'minimum package' on duty of care (including insurance, PPE, IFAKs, MHPSS, Training) including support for both preventive (eg mandatory psychological first aid training, resilience-building workshops, and facilitated peer-support) and curative actions (eg psychological care for staff and volunteers, rest and recuperation programs). HAI India is consulting with various stakeholders on a proposed 'Charter of Rights' for LNAs that addresses a wider framework; including attention to LNA staff salaries, grievance procedures when LNAs experience unfair practices by intermediaries and access to legal support when LNA staff face arbitrary detention or other threats in the line of duty. This builds on the influential '[Status of Frontline Humanitarian Workers](#)' study supported by CWS -Asia, COAST Bangladesh and ECOWEB Philippines.

*If your organisation has best practice examples of the intermediary model which you would like to share to inspire change in practice, please email [c4c-advocacy@dgroups.io](mailto:c4c-advocacy@dgroups.io).*

*This brief was written by Sian Olwen Rowbotham of Norwegian People's Aid, Howard Mollett of CAFOD and Qamar Iqbal of Pak Mission Society on behalf of the Charter 4 Change Advocacy Working Group. Thanks to all the Charter for Change endorsers and signatories for their collaboration, inputs and expertise in forming this collection of good practices relating to intermediary role.*

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