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Lessons in Aid Localization from Romania's Refugee Response











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1.



INTRODUCTION

The full-scale invasion of Ukraine in February 2022 triggered one of the largest humanitarian crises in recent history, leading to the displacement of millions of people across Europe. Given its strategic position as a European Union (EU) Member State with a 600-kilometer shared border with Ukraine, Romania played a significant role in managing the crisis, both as a gateway to other parts of Europe and a destination for Ukrainian refugees.

This report examines Romania's humanitarian response to the Ukrainian crisis through the lens of aid localization, analyzing how national and local actors adapted to the emergency, how they collaborated with international organizations and funding agencies, and what factors enabled or constrained aid effectiveness.

The concept of aid localization emphasizes shifting power, resources, and decision-making to local and national actors, ensuring that aid efforts are more contextually appropriate and sustainable. This approach was particularly evident in Romania, where civil society organizations (CSOs), local authorities, and grassroots initiatives played a central role in providing services and integrating refugees. The response was characterized by strong CSO networks, governmental coordination mechanisms, and community-led interventions, which helped overcome initial logistical and bureaucratic hurdles. The Romanian context was also a proving ground for innovative collaborations between local and international actors, which demonstrated both the promise of locally led partnerships, as well as the challenges inherent in designing, implementing, and sustaining such partnerships in a large and fast-paced humanitarian emergency.

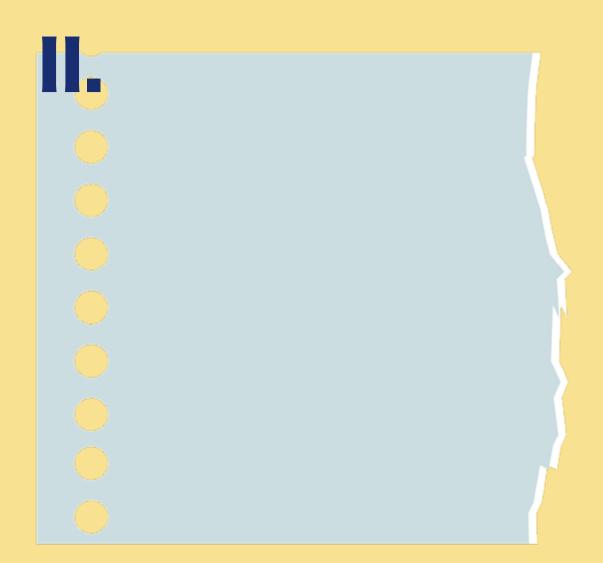
Our analysis of Romania's humanitarian response is informed by a variety of primary and secondary source data. The main findings are based on original qualitative interviews and focus groups conducted with a wide range of local and international actors, including Romanian CSOs, local and national authorities, international non-governmental organizations (INGOs), United Nations (UN) agencies, international donors, and Ukrainian refugees. The study also utilizes secondary source materials, such government reports, CSO and INGO publications, academic studies, and publicly available data sets, to support and verify our main conclusions.

One of the main objectives of this study is to provide an evidence-based assessment of Romania's humanitarian response, which highlights both successes and shortcomings in the localization of aid. Here, our analysis corroborates a number of insights from the existing research on aid localization, affirming the importance of operational context and prior institutional relationships in paving the way for locally led partnerships, as well as highlighting the challenges posed by inconsistent and unpredictable funding, and complex monitoring and reporting requirements. In brief, the success of Romania's local humanitarian response can be largely attributed to the fast and flexible mobilization of the country's well established network of CSOs. as well as the decisions of key governmental actors and international partners who recognized the importance of supporting and empowering local actors. However, the response was also constrained by structural barriers that reduced direct funding to local organizations, saddled local CSOs with bureaucratic red tape, and threatened the long term sustainability of locally led service delivery.

Another key objective of this study is to extrapolate generalizable insights about the practical implementation of aid localization. Based on empirical patterns observed in the Romanian case, we introduce a novel typology of operational "models of practice," which is intended to promote more systematic thinking about what local partnership can and should look like in a real-world humanitarian response. The framework identifies

several distinct approaches to local partnership, describing their key attributes, enabling conditions, and relative strengths and weaknesses as models of aid localization. Further, we highlight case studies of some particularly promising models of local partnership from the Romanian context, which might serve as examples for future humanitarian emergencies.

Ultimately, this study is intended to spark critical reflection about the practice of aid localization, not only among stakeholders in Romania, but among the wider community of policymakers and humanitarian actors who will lead future humanitarian responses. To that end, the report concludes with a set of policy recommendations drawn from our empirical analysis of the Romanian case, which highlight how donors and governments can improve aid localization in humanitarian emergencies. Specifically, we consider the importance of investing in long-term trust-based partnerships with local organizations and CSO networks, streamlining bureaucratic requirements for local actors, and providing sustainable financing mechanisms with clear exit strategies.



LITERATURE REVIEW

One of the central dilemmas confronting the humanitarian field is the top-down nature of international funding and aid delivery in complex humanitarian emergencies (Barbelet et al., 2021; Robillard, Atim and Maxwell 2021; Viswanathan 2023). Not only do large international organizations control the lion's share of humanitarian funding (Lattimer and Swithern, 2016; Poole, 2018), but local actors are excluded from international humanitarian coordination mechanisms, and frequently have little decision-making authority over how aid is utilized in a humanitarian crisis (Poole, 2014; Els and Carstensen, 2016; de Geoffroy and Grunewald, 2017; Robillard, Atim and Maxwell 2021).

In recent years, the concept of aid localization has risen to prominence as a potential solution. While there is no universally agreed upon definition, at its root, the aim of the localization agenda is to implement international aid policies and operational protocols that put more power and agency in the hands of local actors (Barbelet et al., 2021; Robillard, Atim and Maxwell 2021). Advocates argue that localization is not only a pragmatic tool to improve the efficacy and efficiency of humanitarian aid (Gingerich and Cohen, 2015), but an ethical imperative to empower affected communities and decolonize the humanitarian field (Slim, 2021; Robillard, Atim and Maxwell 2021).

The localization movement has been propelled forward by a series of high-profile policy endorsements—most notably, the Charter for Change (CEFORD, 2015) and the Grand Bargain (IASC, 2016)—which have elevated aid localization as a core tenet of the global humanitarian reform agenda. In turn, many of the most prominent players in the humanitarian field have made public commitments to the principle of aid localization (for example, see: IFRC, 2022; USAID, 2022; PLAN International, 2021). However, in practice, there remain substantial gaps in implementation (Lees et al., 2021; Els and Fröjmar, 2021), and a number of unsettled questions about whether and how aid localization

should work in real-world humanitarian emergencies (Viswanathan 2023; Barbelet et al., 2021; Robillard, Atim and Maxwell 2021).

SETTING THE GOALPOSTS

One of the most fundamental debates in the literature is about the nature and depth of change that localization requires: Is the goal of localization to incorporate local actors into existing humanitarian structures and systems? Or does it require a more fundamental transformation of the aid system? If the goal is inclusion, localization can be advanced through relatively straight-forward changes in funding mechanisms and aid coordination structures.

However, critics argue that this approach is insufficient, and may inadvertently undermine local humanitarian action, to the extent that it pressures local actors to take on "the image of international organizations" rather than adapting the international system to the local context (Donini, 2010; Robillard, Atim and Maxwell, 2021). Instead, many contend that localization requires a more fundamental reorientation of the humanitarian system—one that disrupts neo-colonial power imbalances and puts the interests and objectives of local actors at the center of the aid system (A4EP, 2020; Barbelet et al., 2021; Slim, 2021).

While the humanitarian field remains deeply divided over the question of inclusion versus transformation, humanitarian policy groups have nevertheless proposed a variety of metrics for practically defining and measuring localization outcomes. Table 1 offers a side-by-side comparison of two of the most prominent examples: the NEAR Network's Localization Performance Measurement Framework (Featherstone, 2019), and the Humanitarian Advisory Group's Measuring Localization: Framework and Tools (Osborne et al., 2019).

While these frameworks differ in nuanced ways, they highlight many of the same core objectives, such as:

- More equitable partnerships between local/national actors and international humanitarian organizations
- Increased access to international humanitarian funding for local/national actors
- A larger role for local/national actors in humanitarian coordination bodies
- More involvement of local affected populations in humanitarian policy making
- More opportunities for local/national actors to take a leading role in coordinated humanitarian action

This pattern suggests that, despite unresolved ideological divisions, there is broad agreement among experts and aid practitioners about the hallmarks of successful localization policy.



Localization Performance Measurement Framework (NEAR Network)		Measuring Localization: Framework and Tools (HAG/PIANGO)	
Indicator	Description	Indicator	Description
Partnerships	More genuine and equitable partnerships, and less sub- contracting	Partnerships	Equitable and complementary partnerships between local, national and international actors
Funding	Improvements in the quantity and quality of funding for local/national actors	Funding	Increased number of national and local organisations describing financial independence that allows them to respond more efficiently
Capacity	More effective support for strong and sustainable institutional capacities for local/national Actors, and less undermining of those capacities by INGOs/UN	Capacity	Local and national organizations are able to respond effectively and efficiently, and have targeted and relevant support from international actors
Coordination and Complementarity	Greater leadership, presence and influence of local/national actors in humanitarian leadership and coordination mechanisms	Coordination and Complementarity	Application of and respect for commonly agreed approaches to 'as local as possible and as international as necessary'
Policy, Influence and Visibility	Increased presence of local/national actors in international policy discussions and greater public recognition and visibility for their contribution to humanitarian response	Policy Influence and Advocacy	Humanitarian action reflects the priorities of affected communities and national actors
Participation	Fuller and more influential involvement of affected people in what relief is provided to them, and how	Participation	Communities lead and participate in humanitarian response
		Leadership	National actors define and lead on humanitarian action

 Table 1: Measuring Localization Outcomes

Sources: Featherstone, A. (2019). Localisation Performance Measurement Framework. Nairobi: NEAR Network, https://www.near.ngo/lpmf; Osborne, J., et al. (2019). Measuring localization: Framework and tools. Melbourne: Humanitarian Advisory Group/PIANGO. https://humanitarianadvisorygroup.org/insight/measuring-localisation-framework-and-tools/

DEFINING LOCAL ACTORS

Another key debate in the localization field concerns who counts as a "local humanitarian actor." In part, this is a question of how wide to stake the tent poles: Does it include local organizations without a conventional humanitarian mission that nevertheless do much of the essential work in responding to local crises (Robillard et al., 2020)? What about informal or "emergent" groups of concerned individuals that may not meet the conventional definition of an organization (Drabek and McEntire, 2003; Solnit, 2009)? Research suggests that such groups often play a vital role in humanitarian emergencies, but they also pose special challenges for the coordination and implementation of aid (Solnit, 2009; Ansell, Boin and Keller, 2010).

A more controversial question is whether so-called "nationalized" INGOs—that is, locally registered branches of large international organizations, such as Oxfam, Save the Children, or World Vision—should qualify as local actors. Proponents argue that these organizations are often led by local staff, embedded in local communities, and committed to the long-term wellbeing of local populations, thereby exhibiting the essential characteristics of local actors (Ramdhani et al., 2021; Slim, 2021). However, critics contend that their connections to international networks and funding streams in the Global North give nationalized NGOs an unfair advantage over home-grown organizations.

Moreover, these international linkages allow them to out-compete locally based organizations for resources, staff, media attention, and humanitarian access—ultimately undermining the power and influence of "authentic" local actors (Global Fund for Community Foundations, 2022; Chipembere, 2023; Viswanathan, 2023).

ENABLING AND INHIBITING FACTORS

Perhaps the most studied question in the literature is about the conditions that enable or inhibit effective local partnerships. Here, it is helpful to distinguish between factors that are rooted in the norms and institutional processes of the global humanitarian system, and those that are specific to the context of a given humanitarian crisis.

At the systemic level, the literature suggests that localization is propelled forward by a mix of ideology and necessity. In part, donors and international organizations are motivated by progressive values and public commitments to the localization agenda (Robillard, Atim and Maxwell 2021), as well as by the promise of greater operational efficiency (Barbelet et al., 2021). Humanitarian access is another key driver of localization, as international organizations are forced to rely more heavily on local actors when they are unable to deliver humanitarian assistance directly to beneficiaries (Wall and Hedlund, 2016; Barbelet et al., 2021).

Conversely, the literature points to a number of structural barriers to localization within the global humanitarian ecosystem. Funding mechanisms and aid coordination bodies often exclude local actors in favor of larger, more established international organizations (Robillard, Atim and Maxwell 2021). Donors and intermediary organizations tend to be risk averse and reluctant to partner with unproven local actors (Barbelet et al., 2021; Robillard, Atim and Maxwell 2021; Viswanathan 2023). Moreover, international organizations concerned with "self-preservation" may be disincentivized from ceding too much control to local actors (Barbelet et al., 2021; Robillard, Atim and Maxwell, 2021).

The literature also suggests that context-specific factors can play a key role in enabling or inhibiting localization in a given humanitarian emergency. In particular, localization is

more likely to take root where the political climate is hospitable to outside assistance, where national government authorities take a leading role in facilitating relief efforts, and where local institutional capacity—or the perception thereof—is strong (Barbelet et al., 2021; Robillard, Atim and Maxwell 2021).

Likewise, there is ample evidence demonstrating the importance of pre-existing institutional relationships and networks, which are critical to facilitating mutual trust between international actors and local partners in humanitarian emergencies (Barbelet et al., 2021; Robillard, Atim and Maxwell, 2021). Following a similar logic, the growing "trust-based philanthropy" movement suggests that donors can produce more equitable outcomes and more effective results by lowering barriers to funding for local community-based organizations and investing in local partners over the long haul (Powell et al., 2024; Salehi, 2024; Global Fund for Children, 2024). In this way, trust between donors and local implementing partners emerges as one the essential driving forces behind effective aid localization.

LOCALIZATION IN PRACTICE

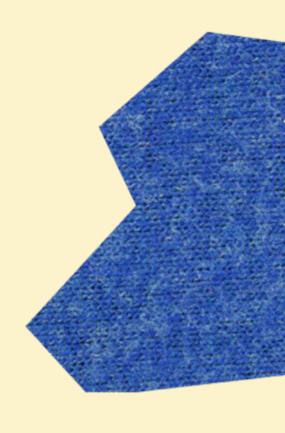
Despite the growing body of scholarship on aid localization, there remain critical gaps in our understanding of the field—especially in terms of practical implementation. While there may be broad agreement about the importance of context, or the general markers of success, we still know relatively little about how localization initiatives are practically organized and carried out in real-world humanitarian emergencies.

Much of what we do know about practical implementation comes from context-specific case studies. While these studies offer rich descriptive data and valuable insights about the benefits and challenges of localization in practice, they focus overwhelmingly on fragile country contexts, where economic resources are severely constrained and local capacity is limited (Howe, Munive and Rosenstock, 2019; Robillard et al., 2020; Alhousseiny, 2021; Mulder, 2023). However, we know that humanitarian emergencies occur in a range of political and economic contexts, with varying conditions that are likely to impact the outcome of localization initiatives. Furthermore, existing studies do not explicitly compare and contrast competing models of implementation in a systematic way—nor do they analyze the relative strengths, weaknesses, and tradeoffs between different applied models. Thus, the question of applied models of implementation is under-theorized and under-researched.

This study is an attempt to address these critical shortcomings in the literature, focusing on applied models of aid localization in the Ukraine refugee response in Romania. Specifically, we analyze the implementation of aid localization efforts in the context of a high-income¹ EU Member State, where conditions are more likely to favor successful outcomes.

Further, we systematically identify and analyze the implementation models of aid localization present in the Romanian case, which reflect broader patterns found in other major humanitarian emergencies around the world. In this way, we conceive of this research as a theory-building case study intended to generate conceptual insights relevant not only to humanitarian actors in Romania or Eastern Europe, but to the international aid localization movement more broadly.

III.



BACKGROUND AND CONTEXT

Regional Response

The full-scale invasion of Ukraine in February 2022 triggered a regional displacement crisis of historic proportions. Since the start of the conflict, the United Nations High Commissioner for Refugees (UNHCR) has recorded over 6.8 million Ukrainian refugees worldwide, of which more than 6.3 million have sought protection in Europe (UNHCR, 2025). In response to the rapid and large-scale influx of Ukrainians, both the European Union and European national governments have taken extraordinary measures to facilitate humanitarian relief efforts.

Within the EU, policymakers activated the Temporary Protection Directive (TPD) for the first time since the mechanism was established in 2001. The TPD is an EU-wide mechanism reserved for exceptional circumstances of mass migration, designed to provide collective protection to displaced persons and to reduce pressure on the national asylum systems of EU countries. The mechanism grants beneficiaries access to residency rights, housing, labor market, social welfare and medical assistance, while unaccompanied children and teenagers also receive access to guardianship, education and special health care. TPD was first activated in March 2022, immediately following the start of the crisis, and was more recently extended to March 2026. Currently, there are approximately 4.2 million Ukrainians registered for temporary protection across the EU.

TPD was also accompanied by a significant financial assistance package from the European Commission, which reallocated approximately 17 billion Euros from the 2014-2020 budget cycle across several financing instruments. One of the stated goals of the aid package was to "ensure sufficient direct support for those working with refugees in local communities" (European Council, 2024). However, in practice, it was not clear how much of the aid was allocated to Ukraine for military, infrastructure

reconstruction and humanitarian support, and how much was destined for humanitarian assistance to refugees within the EU. Nor was it clear how much of the funding could be accessed directly by NGOs serving Ukrainians in EU Member States.²

Since the 2016 World Humanitarian Summit, the EU's Directorate-General for Civil Protection and Humanitarian Aid Operations (DG ECHO) has made aid localization a core part of its humanitarian mission (European Commission, 2021). Based on the principle that humanitarian action is more timely, appropriate and cost-effective when it is led at the local level, the EU has worked to build stronger collaborations with local actors, and promote knowledge and capacity transfer so that local actors can lead and deliver humanitarian aid services wherever possible (DG ECHO, 2023). More recently, in response to the COVID-19 pandemic and the reformulation of the Grand Bargain framework in 2021 (i.e. "Grand Bargain 2.0"), the European Commission intensified its commitment to the principle of aid localization (European Commission, 2021).

In addition to the EU's intergovernmental response, a significant share of humanitarian assistance for Ukrainian refugees was furnished by international NGOs and UN agencies. Much of this aid was channeled through the Regional Refugee Response Plan (RRP) for Ukraine, a mechanism facilitated by UNHCR to coordinate international assistance for the 10 European countries most affected by the influx of displaced Ukrainians. Through the RRP mechanism, governments, foundations, and private donors contributed more than 1.6 billion USD to aid Ukrainian refugees in Europe since the start of the crisis (UN OCHA, 2025). Tables 2 and 3 show the total funding figures and major donors for the Ukraine RRP.

Table 2: Ukraine RRP Funding

Year	Required (US\$m)	Funded (US\$m)	Share Funded
2022	1,789.9	1,011.2	56.5%
2023	1,685.5	393.1	23.3%
2024	1,080.6	266.8	24.7%

Source: UN OCHA Financial Tracking Service. (https://fts.unocha.org/plans/1218/flows)

Table 3: Ukraine RRP Donors

Year	5 Largest Funding Sources	Amount (US\$m)	Share of Total
2022	United States of America, Govt. of Disasters Emergency Committee Private (Individuals & Orgs) United Kingdom, Govt. of Norway, Govt. of	319.5 104.4 56.3 54.3	31.6% 10.3% 5.6% 5.4% 4.7%
2023	United States of America, Govt. of	168.4	42.9%
	Germany, Govt. of	46.5	11.8%
	Norway, Govt. of	35.3	9.0%
	Disasters Emergency Committee	21.8	5.5%
	Switzerland, Govt. of	19.7	5.0%
2024	United States of America, Govt. of	140.2	52.6%
	European Commission	30.4	11.4%
	Republic of Korea, Govt. of	15.8	5.9%
	Norway, Govt. of	13.1	4.9%
	Switzerland, Govt. of	11.3	4.2%

Source: UN OCHA Financial Tracking Service. (https://fts.unocha.org/plans/1218/flows)

While the RRP provided a critical stream of humanitarian funding, the figures reveal a year-over-year decrease in funding, as well as significant shortfalls between the required levels of humanitarian funding and the actual funding received from donors. This can be attributed in part to decreasing donor interest in the Ukraine crisis, which was competing with other high-profile international crises, especially in 2024. It also reflects a widely held expectation that national actors would assume more of the core responsibilities for refugee integration as the crisis wore on.

Further, according to publicly available data from the UN's Financial Tracking Service, the overwhelming majority of RRP funding for Ukraine passed through the hands of international intermediaries. For all 3 years of the Ukraine RRP, less than 1% of the money raised through the coordinated appeal went directly to national or local non-state actors in affected EU states. Rather, nearly all funding was allocated to international actors, including UN agencies, international NGOs, and other internationally affiliated organizations.

To be clear, this data obscures the fact that much of the funding allocated to international actors through the RRP did eventually reach national and local CSOs through various sub-granting and local partnership agreements, as detailed in the findings of this report.

However, the fact that so little money was allocated directly to local actors is a telling example of the unequal power and access to resources enjoyed by international actors in a major humanitarian emergency like the Ukraine refugee crisis.

¹According to the World Bank classification system, Romania has been categorized as a "high income" country since 2021. See: https://datahelpdesk.worldbank.org/knowledge-base/articles/906519-world-bank-country-and-lending-groups

²As discussed during a Brussels event organized by FONPC and European Parliamentary Representative Victor Negrescu in June 2023.

Romanian National Response

As a neighboring country with one of the longest borders with Ukraine, Romania played a major role in the Ukraine crisis, both as a destination for refugees and as a transit route to other parts of Europe. By the end of 2024, Romanian authorities logged more than 7.9 million border crossings to Romania from Ukraine, including over 2 million persons transiting through the Republic of Moldova (UNHCR, 2024a). The overwhelming majority of Ukrainians fleeing the war transited through Romania, typically on their way to destination countries in Western and Southern Europe. However, as of December 1, 2024, nearly 193.000 Ukrainians were registered for temporary protection or a similar national protection scheme in Romania, with a slightly lower figure of approximately 177,000 refugees recorded in the Romanian territory--making Romania the 7th largest host country for Ukrainian refugees in Europe, after Germany, Poland, Czechia, UK, Spain and Italy (UNHCR, 2024a).

In collaboration with European and international partners, Romanian authorities and civil society actors have welcomed Ukrainian refugees in a show of hospitality unprecedented in the recent history of Romania. Many Romanian CSOs and private citizens have shown solidarity with Ukraine, organizing protests, donation drives, and advocacy campaigns. This solidarity has strengthened civil society organizations and networks within Romania, as well as through partnerships with international NGOs formed in response to the crisis.

The overall structure of Romania's humanitarian response consists of two layers. The first layer, focusing on the immediate emergency response, was coordinated by the Department for Emergency Situations (DSU) within the Ministry of Internal Affairs. Building on the agency's

significant operational infrastructure, as well as its recent experience responding to the COVID-19 pandemic, DSU was well positioned to mobilize staff, material resources, and communication networks to coordinate and facilitate humanitarian aid.

Among its most notable accomplishments, DSU established emergency transit centers in border regions around Romania; it collaborated with international partners to facilitate the "fast-track" transfer of more than 20,000 refugees through Moldova to Romania (IOM Romania, 2024); and it created the Sprijin Umanitar [Humanitarian Support] coordination platform for humanitarian information-sharing, including weekly meetings in which hundreds of local, national, and international humanitarian actors have participated.

The second layer, the medium- to long-term response focusing on the protection and inclusion of refugees, was led by a high-level task force within the Chancellery of the Prime Minister. In cooperation with national, European, and international partners, this task force provided the strategic framework for the crisis response and orchestrated the adoption of over 20 pieces of legislation addressing the needs of displaced Ukrainian people. The centerpiece of this legislation was the National Plan of Measures (NPM) for the Protection and Inclusion of Displaced Persons from Ukraine, adopted on June 29, 2022.

The first of its kind among EU Member States, with a €200 million budget for its annual implementation, the NPM articulates a coherent and coordinated strategy that aimed to achieve the long-term protection and inclusion of refugees who have chosen to remain in Romania. In conjunction with six related working groups for Health, Education, Labor, Housing, Vulnerable Populations, and Children and Youth, the NPM serves as the blueprint for the government's long-term protection response (Turza, 2023).

All in all, the response to the Ukrainian crisis in Romania has been shaped by a variety of contextual factors that facilitated a rapid humanitarian response and influenced the way aid and services were delivered on the ground. These factors include Romania's geographic proximity to Ukraine, the presence of well-established non-governmental organizations (NGOs) and an active civil society, the support of the European Union (EU), the solidarity shown by the host community, and the capacities of the health and social service sectors. Additionally, several challenges and constraints emerged in the process, affecting the efficiency and sustainability of aid efforts.

In terms of geographic proximity, not only Romania shares one of the largest borders with Ukraine, but it also shares a large border with the Republic of Moldova. These aspects generated a set of challenges, from the high influx of refugees transiting Romania to the ones looking for shelter here. In this context, DSU through its representatives in the territory, organized the response at the border. CSOs were key pillars in organizing the response and delivering the needed services.

Equally important, Romania's well-established NGO sector played a crucial role in responding to the refugee crisis. While many of these organizations had experience in crisis response, such as providing social services, disaster relief, and support during the COVID-19 pandemic, refugee integration was a relatively new challenge for many of them. Nevertheless, local and national NGOs adapted their core competencies immediately to the new crisis. Moreover, international organizations and numerous local volunteer groups leveraged their existing infrastructure and expertise to provide critical assistance to refugees.

Also, Romania benefits from structured NGO networks such as the Federation of Nongovernmental Organizations for the Child (FONPC) and the Federation of Nongovernmental Organizations

for Social Services. These federations played a key role in coordinating NGO responses, advocating for policy changes, and facilitating cooperation between NGOs and government institutions. In addition to the CSOs, the Romanian population demonstrated significant solidarity with Ukrainian refugees. Volunteers at both the individual and organizational levels mobilized rapidly, providing food, shelter, clothing, and transportation. Donations, including from private companies, poured in from all regions of Romania, and makeshift platforms were created to coordinate aid efforts.

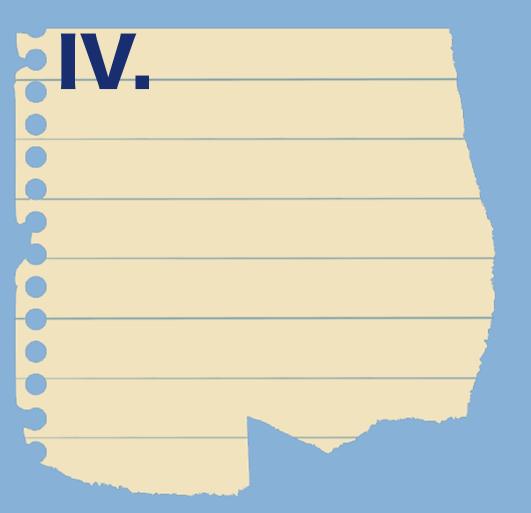
As a member of the European Union since 2007, Romania benefited from policy frameworks, logistical support, and financial aid from the EU in managing the refugee crisis. The EU's Temporary Protection Directive provided immediate legal status and services to Ukrainian refugees, allowing Romania to allocate resources effectively. Romania received funding through several EU financial instruments, including the Asylum, Migration, and Integration Fund (AMIF) and the Internal Security Fund (ISF), as well as REACT-EU (Recovery Assistance for Cohesion and the Territories of Europe). These funds supported accommodation, healthcare, and social services for refugees.

The border response was one core dimension of humanitarian action, but another dimension refers to all the services delivered in the cities that were transited by the refugees or in the places where they settled. In this respect, the humanitarian response varied across regions and internal context. While border areas are not abundant with job opportunities, there is still a numerous group of refugees living in Suceava, as well as smaller cities like Baia-Mare and lasi. The capital city of Bucharest managed to attract the highest number of refugees, due to better job opportunities and more available services, followed by Constanta (proximity to Odessa) and Brasov, Cluj-Napoca, Sibiu, Timisoara. In this respect, through the analysis, there will be

some distinctions between the border response and the other integrated services offered by CSOs and some local authorities.

Local authorities, alongside national authorities and CSOs, played an important role in the implementation of humanitarian aid. While there is a big variation across the humanitarian response, some municipalities managed to collaborate with the CSOs in designing a more articulate intervention.

Equally important, local and national authorities had to deliver social and health services, all this in a system that was already under pressure. In the interaction with the authorities, Ukrainian refugees faced multiple challenges including language barriers, inconsistent procedures across counties, difficulty registering with family doctors, and limited access to subsidized medications.



METHODOLOGY

Research Design

In line with the main objectives of the study, this report is grounded in a qualitative research design, utilizing both primary and secondary data. The primary data was collected through 40 original interviews and two focus groups, constituting the core data set used for the analysis. Secondary data including official reports, governmental websites, and NGO grey literature was deployed for theory development and validation of the findings.

The research process was organized in three main phases: (1) a theoretical and comparative review of the aid localization literature; (2) qualitative data collection through interviews and focus groups; and (3) data analysis and formulation of research findings and recommendations. Desk research was used to assist in developing the theoretical framework for this study. This included secondary sources consisting of specialized academic literature, non-governmental and governmental grey literature reports, and other official data.

To gain in-depth insights about aid localization in Romania, the study relied on a qualitative research design with semi-structured interviews and focus groups. By the end of data collection (December 2024), 40 semi-structured interviews were conducted with key stakeholders, including representatives from national and local CSOs, international organizations, donors, local and national authorities, beneficiaries, and host communities. The interview guide addressed several thematic areas, including partnership, leadership, coordination and complementarity, policy and advocacy, institutional capacity, and financing and reporting. Each thematic area included a set of questions adapted to the profile of the respondents, depending on the type of stakeholder. In addition to individual interviews, we conducted focus groups with representatives of local CSOs and aid beneficiaries from the Ukrainian community. These discussions

helped uncover diverse perspectives and enabled comparative analysis across different experiences and approaches.

Finally, the methodology was validated by an international Steering Committee, which included researchers, members of academic institutions, and key stakeholders from various humanitarian organizations, all with expertise in research and the global management of emergency situations. The Steering Committee met with the researchers and contributed suggestions at multiple stages of the research process, helping to refine the scope, research design, and findings of the study, and better position the work in the academic and policy literature. However, Steering Committee members did not directly participate in the data collection or analysis processes, and are not responsible for the findings of this study.

Data Analysis

The responses for both interviews and focus groups were recorded and transcribed using the Transkriptor software. Interviews were translated into English and Romanian, for a better understanding of the meaning across members of the research team. However, even with the technological advancements of translation tools, there is a risk of diminishing the quality of the data. This challenge was addressed with manual translation on a case-by-case basis where needed, and discussed by the team at multiple phases of the research process.

In the second stage of data analysis, the team developed and refined an analytical tool for reviewing and coding the data, which included a common set of thematic areas and subtopics. The tool provided a systematic framework for reviewing and analyzing interview and focus group transcripts, while allowing for enough flexibility to uncover new ideas and insights in the qualitative

data. In particular, the data analysis process focused on pinpointing factors that enabled or inhibited aid localization in the Romanian context, as well as identifying and analyzing different models of practical implementation with respect to aid localization.

Finally, based on the findings from both our theoretical review of the literature and our analysis of original qualitative data, the study proposes a set of actionable recommendations tailored for practitioners and policymakers. These recommendations aim to enhance aid localization practices, improve coordination between international and local actors, and promote sustainable, community-driven humanitarian interventions.

One important limitation of this study is the lack of a fully representative sample of respondents. While the study does include a wide range of stakeholders as research participants, time and logistical constraints prevented the research team from exhausting all potential avenues for interviews. In particular, the study includes relatively few local government representatives (i.e. from municipalities, county councils, etc.) because of their reluctance to respond to interview requests. While we attempted to mitigate this shortcoming by meeting with representatives from other local institutions with knowledge of the local governance process, there may still be relevant ideas or perspectives that are not represented in the data.

Another shortcoming is the limited availability of financial data, which prevented a detailed analysis of the economic implications of the various localization models discussed in this report. This specific line of inquiry was not one of the main objectives of this study, and the selected research methodology does not easily allow for in-depth financial analysis. Therefore, the study may approach the topic of financial implications where relevant, but it is important to acknowledge that it does not produce solid conclusions in this area.

V.

LOCALIZATION INTHE ROMANIAN CONTEXT

One of the primary objectives of this study is to offer an evidence-based assessment of aid localization in the Romanian refugee response. Specifically, we aim to illuminate how relevant stakeholders understood the localization process, analyze the factors that enabled or encouraged aid localization, and identify obstacles that negatively affected partnerships between local and international actors.

In line with previous research on aid localization, our findings highlight the importance of operational context and prior institutional relationships in paving the way for locally led partnerships. Specifically, we find that Romania's favorable political and economic environment, as well as the strength and operational capacity of state institutions and local CSOs, were critical to the success of localization efforts. We also find that local Romanian organizations that had previously established relationships with international donors were especially well positioned to attract and secure humanitarian funding during the Ukraine crisis.

At the same time, our analysis suggests that localization efforts were hampered by well-established institutional and bureaucratic barriers in the humanitarian field. In particular, many local actors had difficulty scaling and sustaining services for beneficiaries in the context of inconsistent and unpredictable international humanitarian funding. Further, local CSOs expressed frustration over the complex, labor intensive, and sometimes conflicting monitoring and reporting requirements imposed by international partners, which many saw a distraction from the work of direct service provision.

Defining Localization

In our discussions with stakeholders, we began by prompting respondents to reflect on the meaning of aid localization from their perspective. Some respondents emphasized the importance of adapting services to the specific local needs of refugees, while taking into account the social, cultural, and political context of the host country. Others emphasized the role of local actors, whether CSOs or governmental institutions, in the design and implementation of humanitarian action. A minority of respondents were able to point to specific models of localization in practice, demonstrating how the concept had been operationalized on the ground.

More broadly, we found that many of the local Romanian CSOs we talked to were either unfamiliar with the term "localization," or struggled to clearly define it. However, in practice, the vast majority of respondents demonstrated an implicit understanding of some core principles frequently associated with the localization concept. The following is a description of some of the most commonly discussed attributes of localization, as identified by research participants.

<u>Local leadership</u>: One of the most common recurring themes was local leadership. At every level of the humanitarian system—from international donors, to national government authorities, to local CSOs—respondents highlighted the importance of national and local organizations taking the lead in the humanitarian response. For example, one UN agency representative succinctly defined localization as: "national and local organizations being in the lead."

<u>Mutuality:</u> Another key theme was mutuality, referring to equitable partnerships between international donors and local organizations, in which both parties engaged in open dialogue and shared decision-making. One local CSO representative explained this process very clearly: "The donors we liked the most [were]

those who sat with us at the table during the programming phase, and pulled us on the sleeve when they felt we were taking it in the wrong direction, or our perception wasn't very good… [when] our relationship with them was very honest and mutual." In a similar vein, an INGO representative emphasized the need for equality and reciprocal accountability: "Equal partnership is based on reciprocity—mutualization and reciprocity. I assess you, I appraise you, but I give you the chance also to appraise me."

Long-term vision: Another important theme concerns the long-term vision required for successful implementation. Rather than reacting only to short-term needs and challenges, localization should be approached with a clear end goal in mind. This point was most clearly articulated by an INGO active in the Romanian response: "Localization in our timeline as an international NGO has a beginning and an end. It's not an unending story… It's really, really important that when you start a localization approach, you have in mind the end."

<u>Process-oriented partnership:</u> Finally, some respondents suggested it is helpful to think of localization as a process made up of successive phases or steps, which can help local partners grow in their capacity and independence. While localization typically begins with direct financial and human resource support, as the partnership matures, international actors should transfer more and more responsibility and visibility to local partners, with the ultimate goal of ensuring their long-term sustainability. As one INGO leader noted: "Giving visibility to local partners, it's really, really important. You know, the goal of localization, in fact, is to make the local organizations able to reach directly to donors."

Together, these insights highlight the diverse ways in which localization is understood by different actors in the humanitarian sector. While the term itself may not always be widely recognized, the principles of local leadership, mutual accountability, and long-term capacity-building remain central to effective humanitarian action.

Operational Context

It is well established in the literature on aid localization that operational context matters. We know that factors such as economic resources, political will, and institutional capacity are critical to the success of both local and international actors in humanitarian emergencies (Barbelet et al., 2021; Robillard, Atim and Maxwell 2021). However, since many of the world's most severe humanitarian crises tend to occur in poorly resourced and politically unstable states, there is little empirical research about aid localization in the context of high-income industrialized democracies (O'Dempsey and Munslow, 2006; Schmid and Raju, 2021). Our research in such a setting suggests that the operational environment in Romania was particularly advantageous for aid localization, despite some special challenges.

Stable and secure environment: Romania's prosperous economy, stable political system, and developed infrastructure were critical to the local humanitarian response, providing local and international actors with vital tools to reach and serve populations in need. Romania's status as an EU Member State meant that it enjoyed the financial and institutional backing of the EU Civil Protection Mechanism, as well as access to significant financial resources from the European Commission to support services for Ukrainians eligible for temporary protection (European Council, 2024). Further, despite widespread criticism of state institutions by the local population, Romania enjoys a capable national government with the capacity to coordinate a complex humanitarian response, as well as a national network of established and professional CSOs with experience delivering community-based services to vulnerable groups at scale. Together,

these factors created a structural environment that was unusually amenable to a robust locally led humanitarian response.

Collaborative political leadership: Beyond these basic structural conditions, proactive government leadership also played a pivotal role in shaping Romania's operational context. The Romanian Prime Minister's office responded quickly to the crisis, establishing a high-level task force to manage and coordinate aid, and orchestrating the adoption of more than 20 legislative acts aimed at addressing the needs of displaced Ukrainians—including the National Plan of Measures (NPM) for the Protection and Inclusion of Displaced Persons from Ukraine (Turza, 2023).

National authorities also modeled openness to collaboration with both international actors and local CSOs. Working closely with UN agencies including UNHCR, IOM, and UNICEF, officials from the Department for Emergency Situations (DSU) established cooperative mechanisms to register, transport, and care for newly arrived refugees, and channeled resources from international donors to local CSOs providing services at border crossings, transit hubs, and refugee host communities.

DSU officials also established a highly regarded platform for information sharing and humanitarian coordination, known as Sprijin Umanitar [Humanitarian Support], which has hosted weekly online meetings with local, national, and international humanitarian actors for more than three years. In the words of one Romanian CSO leader, the weekly meetings were: "very useful and very interesting, because there we were able to give feedback directly from the field, with all the problems we had, and you know that some very important decisions were made there...I'm telling you, I didn't miss a single one."

CASE STUDY: INSTITUTIONAL FRAMEWORK OF ROMANIA'S HUMANITARIAN RESPONSE

The Romanian government played a central role in coordinating the response to the refugee crisis, establishing a high-level decision-making Task Force, known as The Commission of Ukraine, under the Prime Minister's leadership. This was complemented by the Strategic Coordination Group for Humanitarian Assistance, which ensured inter-agency collaboration at the national, European, and international levels.

At the operational level, Romania's response functioned across two main pillars: emergency aid and long-term protection. The Department for Emergency Situations (DSU) coordinated urgent humanitarian support at border crossings, including shelter, food, and medical care. To institutionalize longer-term refugee protection, the government formed six specialized working groups addressing housing, employment, education, healthcare, vulnerable populations, and child protection.

These working groups were coordinated by the Strategic Coordination Group, integrating experts from relevant ministries, UN agencies, and CSO representatives. The proposed measures were then formalized into the National Plan for Protection and Inclusion of Ukrainian Refugees (approved by Emergency Ordinance no. 100/29.06.2022).

Parallel to government-led coordination, the UNHCR launched the Refugee Response Plan (RRP) to consolidate efforts among UN agencies, INGOs, and national organizations. Seven working groups were established, focusing on areas such as inter-agency coordination, protection, health (including mental health support), financial assistance, and information management.

Source: https://www.gov.ro/ro/pagina/ukraine-together-we-help-more

While Romania's institutional framework provided a solid foundation for refugee response, ensuring long-term sustainability requires enhanced coordination, predictable funding models, and stronger integration and financing of the national CSOs specialized in delivering services for vulnerable groups.

Active civil society mobilization: Of course, aid localization could not have succeeded without the vital operational and organizational leadership of civil society. With few exceptions, local and national CSOs were the first and primary actors providing direct humanitarian assistance at border crossing points, transit stations, and temporary refugee shelters. They mobilized resources, staff, volunteers, and expertise to provide a wide variety of relief aid to Ukrainian refugees. In some cases, CSO leaders reactivated previously established networks from the COVID-19 pandemic, reconfiguring communication protocols and volunteer networks in response to the Ukraine crisis. In other cases, they started new grassroots initiatives, attracting donations and volunteers who had never before participated in organized civic action. A UN official familiar with the Romanian case observed: "It's been very impressive. It's been a massive step-up mobilisation...And we have been absolutely dependent on civil society to achieve all the goals that we have."

Broadly speaking, the local humanitarian response included several different types of CSOs, each playing an important role in providing direct assistance or organizational support. A number of specialized CSOs with experience in refugee assistance played a key role in safeguarding refugee rights and guiding the work of other organizations (e.g., CNRR, JRS, LOGS, MIC). Other local CSOs, particularly those with established expertise in social services, adapted their programs to provide assistance in areas such as education, child protection, labor market integration, food security, emergency housing, and mental health services (e.g., Asociația Carusel, Ateliere Fără Frontiere, Code for Romania, ICAM, Inima de Copil, O Masă Caldă, Qartz, Star of Hope). Some organizations that previously operated in unrelated fields expanded their mandates to support refugees, such as Code for Romania, which created the Dopamoha information platform, Rădăutiul Civic, which opened a transportation

logistics hub near the Siret border, and PATRIR, which established a community center for Ukrainian families in Cluj-Napoca. Additionally, informal grassroots initiatives emerged to provide humanitarian aid, leveraging volunteers and donated goods to meet refugees' immediate needs. While some of these initiatives were temporary, others evolved into formalized organizations that continued operating beyond the initial emergency response. Finally, national and regional CSO networks also played a vital role by providing training, operational guidance, legislative advocacy, and access to special funding opportunities for member organizations. Collectively, these organizations formed the backbone of Romania's humanitarian response, supplying labor, expertise, and essential resources that enabled the success of a locally led response. Together, these organizations constituted the backbone of Romania's humanitarian response, providing essential labor, expertise, and material resources without which a locally led response would not have been possible.

Over-reliance on CSOs: Despite the advantageous circumstances, there were some important limitations to the humanitarian response in Romania. The government response varied across institutions and municipalities, with some local authorities taking proactive measures, while others struggled to coordinate refugee integration efforts. This translated into a heavy reliance on CSOs, which raised concerns about long-term sustainability of the measures and their capacity to respond to refugees' complex needs. Further, while the national government coordinated the general response, important measures remained unevenly implemented due to weak administrative capacity and inadequate public funding. Therefore, CSOs had to fill service gaps with limited and short-term funding. For example, national and local authorities failed to hire translators for employment agencies (AJOFM), welfare offices (DAS), school inspectorates, and hospitals, creating language barriers that hindered access to essential services. The shortage of teachers and medical professionals capable of assisting Ukrainian refugees further exacerbated the problem. CSOs made significant efforts to compensate for these institutional shortcomings, but without sustained government funding or integration of refugees into formal programs, this approach was not viable in the long term. A national CSO representative summarized the issue: "The authorities have weak integration programs for refugees, and the situation may become critical because NGOs are running out of funds."

International paradigm shift: Finally, the unique context also required a paradigm shift for international actors accustomed to operating in settings where governments and CSOs had less capacity. Many international organizations had to adjust their expectations and take a supporting role rather than leading the response. As a national government official noted: "I listened to them very nicely and very elegantly, after which I explained Romania is an EU Member State. We have an established humanitarian coordination system, supported by the European Commission.

They are welcome to contribute, but they must be part of our national response—they cannot create a parallel system." Moreover, the international organizations, including UN structures, had to readjust their working strategies. While UN coordination protocols inadvertently led to duplicative and parallel structures, causing frustration among some national and local CSOs, in time practices have transformed into collaborative actions, where UN structures collect feedback from beneficiaries and supply governmental bodies with vital information from the field.

Path Dependence in Local Partnerships

Another central finding from our research is that partnership agreements between international actors and local CSOs were highly path dependent. Donors and funding intermediaries clearly preferred working with established local partners, as well as larger CSOs with the capacity to handle bigger grants. As such, past funding and operational capacity were often the best predictors of future funding opportunities.

While this approach has a clear logic and real benefits, we find that it also results in inefficiencies and missed opportunities. By concentrating funding in the hands of relatively few preferred organizations, it can fuel artificially rapid and unsustainable growth, while depriving other potential partners of opportunities to secure financial backing.

Preference for previous partners: One of the clearest findings from our research is that international funders and funding intermediaries held a strong preference for working with established local partners, especially in the emergency phase of the response. Local CSOs who were already known to funding organizations were perceived as less risky and more reliable implementing partners. Moreover, local partners who had previously received funds from a granting agency could often bypass lengthy due diligence processes required for new partnerships, facilitating quicker and more efficient scale-up of services.

Another key factor was the element of trust. Many donors and funding intermediaries emphasized the importance of trust and personal relationships in facilitating effective local partnerships. Some also connected this to the practical and ethical benefits of long-term investment in local partners, in line with the core tenets of trust-based philanthropy. As such, trust emerged as one of the primary reasons for prioritizing agreements with established local

partners. In the words of one respondent from an international funding organization: "It's a question of trust····You need to have a history, a common history, and common understanding about facts and experiences···so you are confident to move together."

Preference for larger CSOs: Another clear finding was that larger CSOs with greater operational capacity enjoyed distinct advantages in attracting and negotiating international funding. In part, they tended to have more professionalized staff with specialized grant writing and accounting skills, making them better positioned to secure and manage international grants with stringent compliance standards.

Larger local organizations also tended to have more extensive professional networks, greater access to international funders, and a better bargaining position in negotiating funding agreements.

In multiple interviews with national CSOs or CSO networks, respondents described how they were able to negotiate with funders and engage with international partners in a truly collaborative fashion. In contrast, many smaller local CSOs indicated that they were unable to even establish direct partnerships with international funders. Instead, they were forced to rely on sub-granting arrangements with larger CSOs, which limited their ability to communicate with donors and influence how funds were allocated.

"Donor darlings" and unintended consequences: While the basic logic of international donor preferences is clear, the end result is mixed. By partnering primarily with large and well established CSOs, funding agencies can reduce bureaucratic hurdles and scale up aid programs more quickly. They can also reduce the risk of failed or mismanaged aid projects and foster trust and reciprocity with preferred local partners. However, channeling resources to only a select subset of local "donor darlings" can also have unintended consequences.

CASE STUDY: GOVERNMENT - CSO COOPERATION - A RATHER NOT SO ORDINARY RELATIONSHIP

The response to the Ukrainian refugee crisis in Romania highlighted the dynamic and evolving relationship between the national government and CSOs. While the government played a central role in border response, policy formulation, emergency coordination, and international negotiations, much of the direct service provision was carried out by local and national CSOs. In comparison to other humanitarian crisis situations, this relationship was marked by an unusually high level of collaboration between CSOs and the national and local authorities. Even though the relationship was not uniform across the country, there are some important features that made the humanitarian response a rather successful one.

At the national level, the Department for Emergency Situations (DSU) played a leading role in managing the immediate crisis response, establishing transit centers, and coordinating humanitarian efforts at border crossings. The Romanian government also created the National Plan of Measures (NPM) to ensure the protection and inclusion of refugees, which included provisions for cooperation with civil society. Moreover, the constant meetings with the CSOs enhanced cooperation and coordination among the various stakeholders. However, many CSOs expressed concerns that despite this framework, much of the funding and decision-making remained centralized.

In the end, COSs had to rely massively on international donor funding and implement the established national policies where government agencies fell short.

CSOs played an indispensable role in providing essential services such as food distribution, shelter assistance, psychosocial support, and legal aid. While local and national organizations consider that the Government was responsive in adapting the legal and general policy context, it failed in mobilizing the needed resources for implementing all the refugee-related strategies.

Clear examples include the lack of official language translators in public hospitals or in other key institutions, the limited administrative capacity of regional labor force offices to offer tailored services for Ukrainian refugees, and the unequal preparedness of schools to integrate refugee children into the national education system. In this context of uneven policy implementation, local CSOs oriented towards international donors either to supplement existing services delivered through state institutions, or to offer complete packages of services in the areas where the state had limited capacity.

Many organizations reported frustrations with inconsistent and bureaucratic funding mechanisms, noting that their contributions were acknowledged but not sufficiently integrated into long-term governmental strategies. The lack of direct institutional funding for CSOs meant that their operations remained vulnerable to fluctuating international aid availability.

Equally important, Romania is a decentralized state, with increased local autonomy. While the Government set up the framework for interventions and tried to implement concrete actions through its local institutions, local municipalities behaved as independent actors. Some municipalities aligned their response to the Governmental approach, collaborating closely with the CSOs and supporting their activities either with funds or with other types of aid (free office space, storage spaces, extra working hours from the employees, etc.). These represent positive examples of local leadership and good governance. Other municipalities struggled to coordinate their response and left the CSOs to lead all the activities in the absence of local government support.

While preferred local partners may be good at attracting funds, they often rely on sub-granting arrangements to provide direct services to beneficiaries. This can reduce the administrative burden on granting agencies, but it also introduces operational inefficiencies and additional layers of bureaucracy at the local level, which can inhibit effective communication and efficient allocation of resources.

Such arrangements also create resentment toward preferred local organizations, increase competition between CSOs, and lead to splintering or duplication of services—patterns that were observed in multiple localities around Romania where a small number of high-profile CSOs dominated the international funding landscape.

Too much international funding directed toward donor darlings can also be harmful to those organizations' long-term development—by overwhelming their capacity and causing them to grow in an artificially rapid and unsustainable way (Geneva Global, 2017). This pattern of rapid and unsustainable growth was a common occurrence in the Romanian context, leading to high levels of stress and burn out in the early days of the crisis, followed by funding shortages and painful layoffs as international funding became more scarce.

At the same time, by focusing too much on high-profile organizations, international funders missed opportunities to support lesser known or recently established partner organizations that would have benefitted from direct international support, ultimately weakening the overall health of the local civil society ecosystem.

"Boom and Bust" Funding Cycles

A core discussion in the humanitarian field concerns the cyclical pattern of "boom and bust" periods of humanitarian funding. Within the first days of a humanitarian crisis, it is common to see a rapid influx of budgetary support for organizations responding to the emergency, followed by a precipitous drop in funding that leaves organizations with limited resources to continue the implementation of programs. While all humanitarian actors struggle to manage the problem of inconsistent funding that is often mismatched with humanitarian needs on the ground, our research suggests that it poses special difficulties for local partner organizations in crisis-affected countries.

<u>"Feast or famine" funding:</u> In our study, respondents emphasized that the inconsistent and often poorly timed availability of funding created significant operational challenges for local actors responding to the Ukrainian refugee crisis. At the beginning of the crisis, international donors rushed to provide funding, overwhelming local organizations that lacked the capacity to scale up quickly enough to absorb and effectively manage the sudden surge of resources.

The rapid influx of funding led to an urgent need for specialized workers, triggering an intense recruitment drive. In some cases, this resulted in a form of "cannibalization" among small, local NGOs, as they competed for the same limited pool of skilled professionals. In other cases, essential positions remained unfilled due to a lack of qualified candidates, especially in the border crossing areas that traditionally are not very well economically developed and do not attract a large pool of skilled workers. While this phenomenon was especially acute for small CSOs, it was also reported by larger organizations who competed for the same resources.

As the crisis wore on, funding cuts left local and national civil society organizations struggling to maintain services. The flood of international solidarity and financial support that had characterized the early phase of the crisis had significantly receded by 2023. In turn, lack of resources forced many CSOs to reduce programming, lay off staff, and shut down services, despite ongoing humanitarian needs. Moreover, many CSOs relied on project-based funding, which created precarious employment conditions for local staff, forcing organizations to lay off experienced personnel as grants ended. This cycle eroded institutional knowledge and left CSOs in a weakened state, unable to sustain long-term impact. A UN agency representative reflected on the evolving funding landscape as follows: "In 2022, you could say money was cheap. [It was] simple to get a lot of international sympathy, a lot of support in the population itself, and that's no longer the case—at least not to the same extent. Money is back to its expensive self... And I don't think all of [the local CSOs] are going to survive... I'm not saying it's survival of the fittest, but it is a little bit of a survival game."

Changing bureaucratic requirements: As the humanitarian response progressed, local CSOs also faced shifting funding conditions and increasingly complex administrative requirements. Initially, donors simplified grant applications and financial reporting procedures, rapidly disbursing funds to address immediate needs. However, as time passed, bureaucratic hurdles increased while financial support decreased. Many CSOs had to transition from contracts with international intermediaries to direct donor funding, which introduced new challenges in compliance and sustainability. Moreover, the lack of a structured, long-term funding approach made it difficult for organizations to effectively plan their budgets, activities, and staffing requirements. As one national CSO leader described the experience: "If only we had time to grow normally in humanitarian assistance and learn, it would have been completely

different. But we had to learn as we did these things, and while we were operating with huge amounts of money… I mean, I learned this job quickly [but it was] steep and excruciating."

Inefficiency and waste: The boom-and-bust nature of funding cycles not only undermined the stability of CSOs, it resulted in waste, inefficiency, and missed opportunities to assist beneficiaries. At the onset of the crisis, there was an overabundance of aid, leading to duplication and misallocation of resources in the early days of the emergency. However, over time, vital services were cut due to lack of funding, resulting in both waste and want at different times in the response. This was particularly problematic for services whose demand peaked later in the crisis, when humanitarian funding was scarce.

Language training and mental health and psychosocial support (MHPSS) services offer instructive examples. In the early days of the crisis, many international donors and INGOs came to Romania offering language courses and mental health counseling. While these were appropriate interventions, they were not well timed, as few Ukrainian beneficiaries desired these services in the initial weeks and months of the crisis. Many Ukrainians still maintained a short-term mindset about their displacement, seeing no need for language classes when they expected to return home to Ukraine soon. Similarly, many refugees were skeptical about MHPSS programming, and were not initially interested in such services.

Over time, as beneficiaries began to view their displacement as a longer term proposition, and as they developed more trusting and open attitudes toward mental health services, interest in these services increased. Unfortunately, in both cases, just as demand for these services grew, financial support was declining, resulting in canceled or discontinued programs at the very moment when they were most needed.

Precarity and responsibility: More than three years since the start of the crisis, international humanitarian funding for Ukrainian refugees has fallen sharply throughout the region, while recent changes in the international landscape add even greater uncertainty about future humanitarian assistance. As the second Trump administration rolls back U.S. funding for humanitarian and development programs around the world, aid dollars are likely to be even scarcer in the months and years ahead—raising the question of the long-term viability of local-international partnerships in the current moment.

While humanitarian actors large and small are negatively impacted by the global funding environment, participants in our study highlighted the special vulnerabilities that local CSOs face in this moment—and the responsibility that international partners have to help protect local actors in uncertain times.

One respondent summarized the dynamic as follows: "Big donors come with their agenda and a lot of funds, and local NGOs have to increase their staff overnight [to] deliver services. But after the program ends, the organizations have to cut the staff and they remain vulnerable, and with no increased capacity. Big donors do not protect the local NGOs. They should leave the organizations in a better situation than they found them."

Now, more than ever, our research suggests that to build a more resilient response system, donors must adopt a long-term vision that prioritizes the institutional stability of local CSOs, ensuring that funding mechanisms support lasting capacity rather than only short-term service delivery. Without a more stable funding mechanism, local actors will continue to face financial insecurity, limiting their ability to maintain essential services, and threatening the long term sustainability of humanitarian action.

CASE STUDY: KATYA HUB A MODEL OF LOCAL GOVERNANCE

One of the most illustrative examples of collaboration between local authorities and CSOs was Katya Hub, a multi-functional refugee support center located in Braşov. The hub emerged as a locally led initiative, bringing together multiple CSOs, local authorities, and international partners to provide a comprehensive range of services for Ukrainian refugees.

Katya Hub operates as a community-driven response center, providingasafeenvironmentforrefugeesinneed. It offers legal counseling, social assistance, psychological support, and employment guidance to facilitate refugee integration into Romanian society.

Additionally, the hub provides Romanian and English language courses, childcare services, and essential resources such as food and hygiene products. By combining the efforts of humanitarian organizations, local volunteers, and international donors, Katya Hub has successfully established itself as a key service hub for displaced persons in Braşov.

The center's hybrid governance model allows for structured collaboration between local authorities and non-governmental actors. While CSOs manage day-to-day service provision, local authorities assist with logistical support and policy alignment, ensuring smooth operations. In fact, the founding director of the Katya Hub was a political advisor from the office of the Deputy Mayor of Braşov, who was tapped to lead the project to ensure close collaboration between local CSOs and City Hall. As such, the hub is an excellent example of how a decentralized yet well-coordinated approach can lead to efficient humanitarian assistance.

Despite its successes, Katya Hub also highlights some of the ongoing challenges in government-CSO collaboration. While local authorities recognize the hub's role in supporting refugees, financial sustainability remains a pressing issue, as most of the funding comes from international donors rather than national programs.

Moreover, the center has had to rely largely on sub-granting arrangements, limiting its ability to directly negotiate terms and priorities with international funders. Ultimately, the case demonstrates that locally led initiatives, supported by both government and civil society, can be highly effective in responding to humanitarian crises. However, without more sustainable funding and stronger institutional integration, the long-term impact of such efforts remains uncertain.

Complex Partnership Arrangements

Another important finding concerns the complex pattern of institutional partnerships between local and international actors in Romania's refugee response. This relates not to the variety of partnership models in use, which we analyze in detail in the next section of this report. Rather, it is primarily about the way local CSOs mixed and matched international funding opportunities to support their operations, and the complex management challenges these partnerships created.

A potpourri of partnerships: Most of the local and national CSOs involved in this study reported engaging in a variety of partnerships with different funding agencies, often at the same time. It was very common for Romanian CSOa to manage multiple simultaneous partnerships with different donors and international intermediaries, such as UN agencies and INGOs. Moreover, national and local CSOs frequently combined funds from several different sources to support a single large program. Indeed, even building facilities, such as community centers and schools, were often funded through multiple overlapping sources of humanitarian financing.

On one hand, this pattern is a testament to the tenacity and resourcefulness of local CSOs, who often found creative ways to cobble together funding to sustain their operations. It is also a marker of the collaborative nature of the humanitarian response overall, which produced many unexpected and synergistic partnerships. However, while these diverse partnership arrangements allowed for greater flexibility and resource pooling, they also placed significant bureaucratic and administrative demands on local implementing partners.

Excessive administrative burden: Due to a lack of standardization between funding agencies, many local CSOs

reported that different reporting requirements for different funding partners created an excessive administrative burden. Local CSOs had to dedicate precious time and staff hours to learning multiple reporting procedures and formats.

Meanwhile, ensuring proper allocation of results, and preventing double counting of beneficiaries, became increasingly difficult as CSOs worked across multiple funding sources at once. One national CSO leader described the administrative burden as follows: "Every [donor] had their procedures, everyone had their tables, everyone had their (reporting) formats····We needed three people on indicators just to be able to manage the volume and typology of different indicators from one donor to another."

Further, although donors were generally open to adapting the scope of grant activities based on feedback from local partners, local CSOs reported that monitoring and reporting requirements remained rigid and non-negotiable. One national CSO representative captured the frustration echoed by a number of respondents: "I couldn't influence [reporting requirements] almost at all···There was no room for maneuver. And we suffered because of that. There was a stage where we initially got angry and lashed out and···argued with them and so on. And after that we realized that no matter how much we argued, these are the rules."

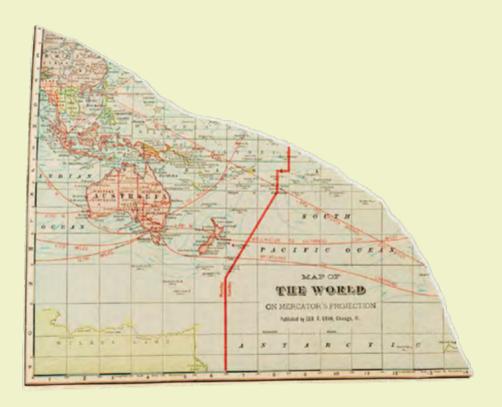
<u>Duplicative training programs:</u> Many local CSOs expressed frustration with duplicative training and capacity-building activities, such as repeated mandatory courses on gender-based violence (GBV) prevention and child safeguarding. While local CSOs supported these trainings in principle, and reported learning valuable information from them, CSOs who partnered with multiple international funders were bewildered by their partners' insistence on repetitive and time-consuming training that mirrored content from courses they had already completed for other international funders.

<u>Exclusive partnerships:</u> In light of the challenges posed by multiple simultaneous international partnerships, a small subset of national CSOs took a different approach, opting instead to work exclusively with a single international partner.

Notable examples include SERA's partnership with CARE France and CNRR's collaboration with UNHCR. In these cases, international funders recognized the advantages of investing in a small number of local organizations, with whom they could develop more trusting, equitable, and effective partnerships. For their part, local CSOs who entered into exclusive partnerships were attracted by the assurance of consistent, reliable, and sustained funding that would allow them to focus on the substance of service delivery, rather than endless grant writing and administrative reporting.

In our research, such exclusive partnerships were rare. They typically depended on existing relationships of trust between local and international partners, as well as assurances of sufficient financial support to scale up the response over time. However, where practicable, they represent a promising alternative to the excessive bureaucratic burdens that most local and national CSOs were forced to shoulder.

VI.



MODELS OF PRACTICE

The second major objective of this study is to advance a more systematic framework for analyzing the applied practice of aid localization. While existing studies offer valuable insights about factors that enable or inhibit localization in applied settings, we still know relatively little about how local partnerships are structured and implemented, or which practices are most likely to facilitate equitable and sustainable local partnerships.

To that end, we propose a novel typology of operational approaches, which we refer to here as "models of practice." Based on empirical patterns observed in the Romanian case, we identify and describe several distinct models of practice, including their key attributes, enabling factors and conditions, and their relative strengths and weaknesses as models of aid localization. Further, we highlight case studies of some particularly promising models of applied practice from the Romanian context, which might serve as examples for future humanitarian emergencies.

Direct Grants

One of the simplest and most straightforward models of local partnership is the direct project grant. This is when an international funding agency awards a one-time grant directly to a local CSO in a crisis-affected country, in order to carry out contractually defined activities. This modality constitutes a type of local partnership in the sense that international actors are supporting local humanitarian action through financial sponsorship. However, they typically do not include adequate provisions for indirect cost recovery, or meaningful support for local capacity building. While some direct grants may be renewable, others are stand-alone awards that do not allow for iterative learning and adaptation. As such, they foster a largely transactional relationship oriented towards a specific project, rather than a true partnership.

In the Romanian context, our research suggests that direct grants were frequently allocated to established local partners based on prior experience with the recipient organization or the recommendation of a trusted partner. Moreover, direct grants were most commonly used in the early stages of the crisis, when donors were looking for a simple and fast way to fund urgently needed humanitarian services, and typically were not linked to or captured in national coordination mechanisms or response plans. As such, they tended to be relatively small-scale and short-lived, providing a useful stopgap measure to deliver much-needed funds as quickly as possible before more durable partnerships and programs could be established.

Some examples of donors utilizing direct grants in Romania include Swiss Solidarity, Expat Forum, the Italian Agency for Development Cooperation (IACS), and a number of national and international private sector businesses. These grants financed aid projects implemented by local CSOs in a variety of Romanian localities, such as PATRIR (Cluj-Napoca), the Migrant Integration Center (Brasov), LOGS (Timisoara), and ASSOC (Baia Mare).

Sub-Granting

The sub-granting modality is a more complex international funding mechanism, which involves an intermediary organization—typically a large, well-established INGO or IGO—that receives and administers large international grant(s), while issuing sub-grants to smaller local CSOs to carry out specific parts of the contracted activities. This is one of the most common local partnership models, both in the Romania example and in other humanitarian crises, because it streamlines the grants administration process and reduces risk for donor agencies, while still allowing humanitarian funds to reach local

point-of-service CSOs in crisis-affected countries. In the Romanian context, major sub-granting programs were administered by international intermediaries including UNHCR, EEA Grants' Active Citizens Fund, Action Aid, and People in Need.

Sub-grants can offer some key benefits to funders and implementing partners. They allow international intermediary organizations to leverage their reputation, experience, and institutional capacity to facilitate funding for smaller, less experienced local CSOs that do not have the capacity, knowledge or manpower to manage the demands of international funders. Intermediaries typically have long-standing experience managing a variety of donor grants and compliance requirements, and usually have the ability to create a unified reporting and compliance system that acts as a single interface with sub-grantees, despite the multitude of funding streams they might be managing upwards. This is often appreciated by donors, who have only one contract to manage, and by local CSOs, who don't have to deal with a multitude of templates and requirements for every funding source. In this way, sub-granting allows donors to streamline operations, move more quickly, and interface with fewer partners, while also shielding them from the risk of direct partnerships with smaller, less experienced local CSOs.

That being said, sub-granting can also lead to inefficiencies, frustrations, and missed opportunities. Sub-grantees typically have minimal control over key parameters of funding agreements, as intermediary organizations are not required to consult or involve end-of-line implementing partners in budgeting or negotiation of policy priorities. Further, by their very nature, sub-granting arrangements introduce additional layers of bureaucracy by positioning an intermediary organization between the donor and local implementing partners. This increased bureaucracy can impede communication, lead to delays in reporting and funds transfers, and reduce overall efficacy and efficiency of services.

Sub-granting arrangements can also negatively impact the dynamics of the local civil society ecosystem by empowering and prioritizing the interests of international intermediaries who control access to key financial resources, while disempowering end-of-line partners who depend on that funding. Moreover, overreliance on sub-granting can undermine critical capacity-building among local CSOs, who do not have adequate opportunities to apply for funding as direct grantees in subsequent funding cycles.

National Affiliates

Another common model of local partnership is when an international network of humanitarian NGOs directs resources to a national chapter or field office affiliated with that network. Commonly referred to as "nationalized" NGOs in the aid literature (Robillard et al., 2020; Ramdhani et al., 2021), we refer to them here as "affiliates" to highlight their close ties to a larger international network. While national affiliates technically operate independently, they typically go by the same name and use the same logo as the international network, thus benefiting from the "branding" and public notoriety of the larger organization. Many of the world's largest and most prominent humanitarian organizations operate according to this organizational structure, including Oxfam, World Vision, and Save the Children, among others.

National affiliates often enjoy special advantages over homegrown CSOs, including more stable funding, institutional and technical support from the international network, greater name recognition and perceived legitimacy, and the ability to attract funds from large donors due to the high-profile reputation of the international umbrella organization. Given their privileged status, many scholars and practitioners contend that

such organizations should not be considered local organizations at all (DuBois, 2017; HAI, 2019; Robillard, Atim and Maxwell 2021). However, in practice, there are many examples of affiliates that are deeply embedded in the local civil society landscape, and are perceived by peer organizations as local actors.

What is distinct about the affiliate model is that funding from the international network is channeled exclusively through the national affiliate. In this way, it constitutes a kind of partnership between local and international actors—albeit one that many critics would not consider a true form of localization. Nonetheless, given the prominence and operational capacity of global NGO networks, such partnerships can play a significant role in locally led humanitarian action. Moreover, national affiliates can follow different operational models, with divergent consequences for aid localization. In the Romanian example, our research suggests at least two distinct affiliate models.

Exclusive Affiliates: One version of the model is when a national affiliate engages in projects managed and implemented exclusively by their own organization. This policy of exclusivity enables tighter control over local programs (and, in turn, less risk), more ability to tailor programs to donor preferences, and potentially greater reward in terms of brand visibility. However, the exclusive affiliate model operates according to a zero-sum logic: Rather than strengthening the local civil society landscape, exclusive affiliates compete with other local actors for resources, staff, and even beneficiaries. As such, they are prone to duplication of services, local turf wars, and unsustainable practices, such as temporary field offices and aid distribution centers.

<u>Collaborative Affiliates:</u> An alternative model is when a national affiliate engages in collaborative projects with other local actors. While collaborative affiliates still enjoy a privileged status among local CSOs, they do not use this advantage to out-compete other local actors. Rather, the national affiliate works jointly with other

CSOs to realize shared objectives, strengthening the local civil society ecosystem. While the affiliate still retains exclusive control of its international grant funding, its collaborative actions bring valuable resources, operational capacity, and public attention to joint initiatives, benefitting all involved. In the Romanian context, World Vision Romania established a clear pattern of collaboration with other local CSOs, both regionally and nationally, including as a major funding partner supporting collaborative refugee resource centers like Katya Hub (Brasov) and RomeExpo (Bucharest).

Local CSO Networks

A particularly promising form of local partnership is the local CSO network model, when an international funding agency collaborates with a local network or federation of CSOs to distribute funds to local member organizations. According to this approach, the network (or a prominent organization within the network) serves as a trust broker, leveraging their capacity and credibility to create funding and partnership opportunities for smaller, lower profile local organizations. While this approach is similar in many ways to the more common sub-granting model, the key difference is that it builds upon, and invests in, local collaborative networks—thereby strengthening capacity and improving relations between local civil society actors, rather than perpetuating hierarchies and stoking competition between local CSOs, as sub-granting often does.

For donors, the local network model offers many of the same benefits as sub-granting. It streamlines the grants administration process and mitigates risk for international funders, reducing the effort and uncertainty of direct partnership with many smaller, less experienced local CSOs. Serving as a formal intermediary, the local network or

federation adds a layer of accountability for funding agencies, while still providing new avenues for partnerships with local actors.

For local CSOs, the benefits are numerous. Most obviously, the network creates opportunities for funding and international partnership that smaller organizations could not access on their own. The network also provides support services and capacity building opportunities for member organizations to help them develop critical grant management skills, while simultaneously alleviating the need to manage the heavy administrative burden of a large international grant on their own. Further, the network can play an important advocacy and communication role, negotiating with funding agencies and government authorities on behalf of local partners, and increasing the visibility of local needs and the efforts of CSOs to address them. Perhaps most critically, since the overarching purpose of CSO associations is to build capacity and empower local member organizations, the network model is fundamentally oriented toward these goals.

To be sure, the network model has its drawbacks. As with sub-granting arrangements, working through network intermediaries introduces an additional layer of bureaucracy in the donor-CSO equation, with the potential to create communication gaps and operational inefficiencies. Likewise, the success of network-based partnerships requires a well-established network with the capacity to attract and manage funds, and the trust and confidence of both international donors and member organizations. These conditions are not a given, especially in cases where CSO networks are not well established, or where funders do not have previous experience partnering with them.

In the Romanian context, a few high-profile CSO networks managed to successfully mediate local partnerships with member organizations. Both the Federation of Nongovernmental Organizations for Social Services (FONSS) and the Federation

of Nongovernmental Organizations for Children (FONPC) were instrumental in attracting international funding, facilitating cooperative agreements with international actors, and coordinating the aid services of local member organizations.

The FONSS network worked closely with donors and local authorities to establish the widely respected Nicolina Center, a collaborative social services hub for refugees in the eastern city of lasi that was jointly operated by several CSOs from the network. For its part, FONPC established an innovative multi-year partnership with CARE France, which funded direct refugee support services provided by more than 30 member organizations across Romania.

In both of these cases, our research suggests local CSO networks were widely regarded trusintermediaries ted that created meaningful opportunities and added value for member organizations.

As one local CSO representative observed: "I think these networks played an essential role because they took the pressure off the smaller organizations to talk to the big donors and basically did all this fine work of gathering the information and the beneficiaries' needs from us, transposed them into lines for funding, negotiated with the big funders, and then gave the grants to smaller organizations, which was a great support. They took the administrative pressure from our shoulders."

Refugee-Led Organizations (RLOs)

A less prominent but highly important form of local partner-ship involves direct support to emergent refugee-led organizations (RLOs). In the Romanian case, UNHCR Romania piloted a small-scale initiative aimed at fostering the development of select RLOs in several refugee host cities around the country. UNHCR collaborated with local Romanian CSO partners, who helped identify RLO grant candidates, and provided technical guidance as RLOs worked through the grant application process. In turn, UNHCR funded several community-based RLOs with small, flexible grants, coupled with continued capacity building support from Romanian CSO partners. The program included two grant-funded RLOs in the Suceava-Rădăuţi region near the mostly highly trafficked border with Ukraine, Organizaţia EDNAE and the Association of Active Ukrainians.

Though relatively few in number and financially insignificant, RLO partnerships have many potential benefits as a model of local partnership. By their very nature, RLOs are responsive to the needs and wishes of aid beneficiaries, since most RLOs start out as volunteer-led initiatives within affected communities (UNHCR, 2024b). By supporting such initiatives, international actors build trust and legitimacy with the beneficiary population. In our research, we found that RLOs and other refugee-led initiatives were among the most valued and trusted forms of humanitarian aid among refugee respondents.

Moreover, RLO partnerships are both cost-effective and empowering, strengthening the capacity of refugees to serve their own needs in the future and advancing the global goal of refugee self-reliance (Diener and Quackenbush, 2024). In short, RLO partnerships are a clear embodiment of the spirit of localization.

That being said, they also entail critical drawbacks. RLO partnerships require flexibility, patience, and reduced funding and reporting procedures to meet the needs of organizations with little formal experience or professional capacity.

They are also reliant on the vision and initiative of refugee leaders, who may not have the resources or desire to invest in formal legally incorporated organizations in the context of their displacement. Further, the problems of capacity and scale are among the biggest challenges, as most recently formed RLOs will simply not have the track record or institutional capacity to manage large grants or provide services at scale.

In sum, while RLO partnerships are an inspiring example of localization, they require intentional effort to identify and foster the development of local partners, and their inherently limited capacity means they are unlikely to take the place of other forms of local partnership.

CASE STUDY: HELP TO HELP UKRAINE - LOCAL CSO NETWORKS IN ACTION

The CARE France response to the Ukraine crisis in Romania and Moldova started in March 2022 and ended in December 2024. The programme raised 16.7 million Euros from more than 20 donors. CARE made a strategic decision to not implement activities directly through a traditional "country office" (CO), but instead financed the projects of 31 local organisations ("sub-partners"). Activities provided assistance to Ukrainian refugees in the areas of food, WASH, health, protection, education, shelter, and integration. The programme was co-managed with two local ("core") partners, Fundaţia SERA ROMÂNIA (SERA) and the Federaţia Organizaţiilor Neguverna- mentale "Pentru Copil" (FONPC), building on existing local capacities and leveraging CARE's humanitarian surge and intermediary capacity. CARE exited Romania in March 2024, after which the program, operating with significantly reduced financial resources, was fully managed by SERA.

Operational set-up and a joint responsibility framework: The response was fully localised from the first days of the response, starting with the needs assessment in the first 72 hrs after the crisis onset, to the shared design and later co-management of the response. Operating without a country office and embedding staff within CARE's partner's offices contributed to co-ownership and shared risk management by naturally creating spaces for shared (i.e., negotiated) decision-making. The light presence maintained by CARE, coupled with the existence of trusted partners and an existing network of CSOs, enabled it to both initiate the crisis response swiftly and execute an exit strategy that was smooth for all parties involved. Perhaps more importantly, the organisation's presence did not threaten to disrupt the existing

NGO ecosystem. However, this posed some logistical challenges for the CARE support team, who worked over 2 years embedded in the partner organization (SERA), including inability to hire CARE staff in Romania, ineligibility of staff for residency permits, and ability to get humanitarian staff visas in a timely manner, leading to a hybrid remote/in-country arrangement.

The project operated according to a co-management arrangement that was defined at the beginning of the crisis, with a steering committee made up of CARE, SERA and FONPC senior staff jointly making strategic decisions about the program strategy, decision and partner selection, a response operational structure with staff from each organization, and the implementation network of the other 29 partners.

- CARE: quality assurance, financial management, general compliance for donors and fundraising
- SERA: Management of sub-partner grants, MEAL, procurement and logistics
- FONPC: Networking, relations with national agencies and organisations, comms and advocacy
- Implementing partners: individual intervention design, activity implementation and reporting

This co-ownership and shared risk management operational model proved effective due to a series of factors, including a long-standing, trust relationship between CARE and SERA of over 20 years, FONPC and SERA-s experience and history of co-operation with local NGOs in Romania, power and resources were adequately transferred by CARE to local partners. However, due to the mix of formal and informal arrangements and the fact that there was an intentional gradual handover of responsibilities, there was sometimes confusion regarding the extent of CARE staff's responsibilities and authority, the relation between job descriptions, titles, and responsibilities was not always straightforward and

sometimes created confusions internally and within the broader CARE network or peer INGOs, while conflict management depended on interpersonal trust, flexibility and communication, and a commitment of staff to make this type of collaboration work.

Funding and program management: The overall budget of 16.7 million EURO from more than 20 donors was significantly higher than the usual short-term humaniatrian programs in a CARE CO. CARE took on a role akin to that of a multi-donor fund manager, nevertheless closely involved in the details of day to day operations and supporting partners, channelling 88% of the budget to local partners in a flexible and risk controlled manner. The 31 local organizations received the funds through four rounds of sub-granting, to ensure activities were responding to the fast changing needs, ongoing fundraising was allocated transparently, risks associated with the high number of new partners was minimized.

The funds were mobilized primarily through private donors and public appeals, rather than institutional donors, resulting in fewer bureaucratic restrictions and allowing CARE to enact certain localization principles, including providing partners with greater flexibility in a bottom-up program approach and negotiating with donors to allow indirect cost recovery (ICR) for local partners as a key factor for their sustainability (however, this was only allowed under UK Disasters Emergency Committee (DEC), Nachbar in Not (NIN), and CARE France private funds (CFPF)).

Nearly all implementing partners lacked experience in working with refugees and/or handling humanitarian emergencies, and they varied significantly in their size, previous exposure to large-scale funding, organizational sophistication, and functional and technical capacities. CARE had to perform a difficult balancing act between donor requirements and offering a simplified operational framework for organisations unaccustomed to strict compliance levels and sometimes limited management capacities.

Due diligence was conducted in a phased manner. All sub-partners underwent an initial, preliminary evaluation, primarily based on responsible statements from the organisations. The urgency to respond to the emergency and the lack of prior relationships with these organisations compelled CARE to accept some risks rely havily on SERA and FONPC to lead the selection process based on their previous experience with most of the organisations (many implementing partners were members of FONPC).

By the second round of funding, the due diligence process was much more comprehensive and based on supporting documentation. Due to their size, partner organisations were naturally unfamiliar with internal control procedures - this necessitated considerable back-and-forth, understanding, and accommodation from both sides to establish common ground with partners unaccustomed to this level of scrutiny. Additionally, he program underwent three external audits. The relationship with only one of the 32 sub-partners was terminated due to poor performance. As the responsible party of last resort before the donors, CARE provided a safety net for everyone, transferring minimal, if any, financial risk to partners.

Upstream reporting to nine different donors and funding streams meant multiple reporting frameworks and periods. Thus, CARE established a standardized procedure applicable to all partner organizations, requesting on a monthly basis a quantitative indicator tracking table (reporting against a catalogue of 40 potential indicators), a narrative report with activity level, results and spending updates, a financial transaction list. However, this proved burdensom for smaller or lower capacity partners. The information collected was centralized by CARE/SERA, data was verified for accuracy and consistency of the data, and was agregated for CARE global and donor reporting. While the ad hoc tools quickly adapted to multiple conflicting needs, they were not tested and required subsequent adjustments

for standardisation among many partners. Joint monitoring visits were conducted to detect any implementation challenges and provide tailored support. A number of beneficiary satisfaction surveys and an external evaluation were also carried out.

CARE staff successfully impressed upon their local colleagues the necessity to adopt new practices (grant or humanitarian context specific) and transferred additional skills through handson processes. For example, safeguarding and PSHEA represent a set of capacities fundamental for CARE but were not fully established among local partners at the beginning of the response, despite many working in child protection and GBV-related issues.

Accordingly, CARE took the lead by conducting gender assessments, capacity-building activities and providing practical tools and procedures, inclduing establishing and standardizing in partnership with SERA the community Feedback and Accountability Mechanism (FAM) for the collective response. Thus, CARE's partnership approach rooted the response in the local knowledge of partners, complemented by the humanitarian expertise brough by the surge team.

Effectiveness of this localized approach: Assistance was provided to 219,000 beneficiaries across all 41 counties of Romania and two border crossing points, 9 districts of Moldova, and across the border into Ukraine, the localized approach delivering successfully on the program strategy goals and targets with an agile, multi-dimensional response. This model allowed for fairly modest organisations, many of which had already, spontaneously started to provide all kinds of assistance to refugees in the border areas, towns, and urban centers, to be supported by CARE, offering a comprehensive range of support tailored to the changing needs of the refugees. The relevance and quality of assistance was confirmed by an external evaluation, several beneficiary satisfaction surveys, and other feedback channels.

There were also indications that the program had attained some longer term outcomes in building the resilience of the refugee community and local CSOs. CARE's localized approach leveraged local human resources without temporarily draining them from local NGOs or competing with them. Also, it allowed for tailored capacity building informed by the needs and growth goals of each partner, allowing some of the larger ones to develop towards financial autonomy with donors or entering a new niche in migration/refugee programming, while for smaller organizations CARE maintained an intermediary, support role that allowed them to deliver the humanitarian programs successfully before transitioning to their usual programs and focus.

VII.



POLICY RECOMMENDATIONS

The final section of this report outlines some key policy recommendations that emerge from our analysis. The recommendations address two important categories of stakeholders: international donors and government authorities. Specifically, we suggest that donors should consider how they cultivate relationships with local partners, how they manage administrative reporting and training requirements, and how they wind down local partnerships. We also address steps that both donors and governments can take to prepare the organizational infrastructure for future humanitarian interventions, by working closely with local partners and CSO networks to establish long-lasting relationships based on trust, cooperation, and mutual exchange.

Recommendations for Donors

Standardized and Streamlined Bureaucracy

One of the critical challenges facing local actors in a humanitarian response is the excessive bureaucratic burden that comes with managing multiple funding streams from various donors. To address this, international donors should develop a unified reporting and compliance framework, allowing local CSOs to efficiently fulfill accountability requirements without being overwhelmed by redundant administrative work. In emergency situations, a "good enough" approach to compliance should be adopted, standardized at least among the largest international donors to ensure that the immediate needs of affected populations take precedence over rigid reporting structures.

The adoption of digital tools designed to harmonize reporting processes across multiple donors and coordination mechanisms could be especially useful in minimizing duplication of efforts and ensuring partial synchronization with national accounting standards.

Besides navigating multiple bureaucratic processes related to reporting, local actors are often required to complete training modules and skills certifications to work with vulnerable groups (e.g., gender mainstreaming, child protection, etc.). When local CSOs collaborate with numerous international granting agencies, these training programs can be duplicative and time consuming. Therefore, international donors should consider establishing commonly recognized training programs for local partners, which would include standardized certifications recognized by many international agencies.

In short, international donors should consider how their bureaucratic procedures and protocols fit into the broader matrix of administrative processes that local grantees must navigate. Where possible, donors should align their practices with other granting agencies to ease the burden on local partners. Streamlined international practices and time-saving digital tools could significantly improve the reporting and evaluation process for local partners.

Further, donors should consider the "big picture" regarding what administrative reporting protocols actually measure, and how well they reveal (or obscure) the long-term sustainability and impact of humanitarian action. While frequent and rigorous quantitative reports may appear to be a responsible practice, they are extraordinarily taxing for small under-staffed local organizations, and can negatively impact staff morale and aid effectiveness if they detracts from the work of direct aid provision.

Moreover, such quantitative measurement tools may not ultimately reveal very much about the quality of services, or the longterm impact of aid programs. Thus, when partnering with local humanitarian actors, donors should weigh the real costs of reporting and compliance protocols against their potential benefits.

Consistent and Sustainable Funding

For local humanitarian action to be truly effective, long-term financial sustainability must be a priority from the outset of a crisis. Donors should not only consider how they enter a crisis but also establish clear exit strategies that leave local partners in a stronger position than when the crisis began. Without this foresight, local organizations may experience a severe and detrimental decline in funding once global attention shifts elsewhere, with serious long term effects on their organizational strength and capacity.

Donors, especially institutional funding structures, should also dedicate a fixed percentage of funding exclusively to national and local CSOs, ensuring that they are not merely sub-contractors but central players in humanitarian efforts. Furthermore, clear partnership principles should be established to define the role of international intermediaries and prevent them from monopolizing funding intended for local actors.

Leverage Local CSO Networks & Take Risks with New Partner Organisations

For effective localization of humanitarian aid, donors should aim for close collaboration with local CSO networks and umbrella organizations. These networks already have deep-rooted expertise and established relationships within their communities, making them well-positioned to coordinate and implement humanitarian initiatives.

Strengthening these networks ensures that resources are allocated efficiently and that smaller, emerging CSOs have the opportunity to participate in humanitarian responses.

International partnerships should not merely serve as sub-granting arrangements that transfer financial risks to local organizations. Instead, they should foster equitable partnerships that leverage the strengths of each actor—local knowledge, technical expertise, advocacy capabilities, and donor relations—to create a more integrated and sustainable response system. This requires a recalibration of the traditional approach to working with "implementing partners," which doesn't create additional layers of management, but rather complements and invests in structures that are already there, leveraging each organization's strategic position and core competencies for the good of all.

Further, Human Resources policies should be more equitable and adapted to strengthen the local humanitarian workforce without destabilizing existing organizations. By recruiting professionals with transferable skills from the private sector (such as finance and logistics experts), CSOs can build stronger operational capacities without engaging in harmful competition for limited NGO-sector personnel. Additionally, small and emerging CSOs, particularly refugee-led organizations and those focused on marginalized populations, should receive tailored support to enhance their ability to compete for funding and scale their operations effectively.

Build Trusting Relationships Before a Major Crisis Occurs

The effectiveness of humanitarian aid depends not only on immediate action but also on long-term preparedness. International donors and national governments must invest in collaborative partnerships during non-crisis periods to ensure that local organizations are ready to respond when emergencies arise. These partnerships should focus on building mutual trust and accountability, and should incorporate clear response strategies in case of a humanitarian intervention.

In particular, long term investments in local CSO networks offer a number of benefits. These networks strengthen the quality and capacity of local organizations in the social service fields, building a cadre of professionalized local actors with experience delivering assistance to vulnerable populations in non-emergency situations. Further, when an emergency strikes, such networks can leverage trust-based relationships with member organizations to active a swift, capable, and authentically local humanitarian response.

Recommendations for National and Local Governments

Invest in Funding and Coordination Mechanisms with Local CSOs

To ensure a sustainable and efficient humanitarian response, national and local governments should establish structured financial mechanisms that support CSOs both in emergency situations and for long-term interventions. A dedicated financing pipeline between government and civil society would allow CSOs to access immediate funding during crises and provide sustained financial support for specialized programs aimed at vulnerable populations.

Moreover, long-term investment in national and regional CSO networks is crucial to strengthening their capacity for coordination, advocacy, and emergency response. By collaborating with international and national emergency actors, governments can support the establishment of structured emergency response training programs. For instance, Romania's Department for Emergency Situations (DSU) could work with international humanitarian organizations to facilitate SPHERE-compliant training programs, ensuring that local responders are adequately prepared to manage future crises.

In addition to the financial aspects, national and local governments should collaborate with CSOs in preparing them

for targeted response in case of other emergencies (e.g., natural disasters, extreme weather events, or health emergencies). The Romanian rapid response, offered through DSU, also reflects the accumulation of experience from numerous interventions inside the country's borders (e.g.floods, fires, and COVID-19). Basic emergency competencies should be transferred to the local CSOs that are specialized in providing social services for various disadvantaged groups.

Equally important is the need to foster social trust and cohesion among local actors. Encouraging collaboration between CSOs, community leaders, and local authorities will help create a resilient civil society network capable of responding effectively to humanitarian challenges. Strengthening these partnerships will not only enhance the immediate response capacity but also build a foundation for long-term cooperation, ensuring that aid localization efforts remain effective and sustainable.

VIII.



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THANK YOU THANK YOU THANK YOU THANK YOU **THANK** YOU

Thanks to all institutions and organizations that agree to support our research with participation at our interviews and focus-groups:

- · Department for Emergency Situations, Ministry of Internal Affairs
- · UNHCR, the UN Refugee Agency (regional and local offices)
- · CARE France
- Eurochild
- · Ashoka Romania
- · The Including Children Affected by Migration Network ICAMnet
- · CARITAS Association Romania
- · European Philanthropic Initiative for Migration EPIM
- · HIAS (Hebrew Immigrant Aid Society) Romania
- · International Organization for Migration-IOM Romania
- SERA Foundation
- · National Asociation of Social Workers CNASR
- Federation of Nonguvernamental Organisations for Social Services -FONSS
- · Ateliere Fără Frontiere (Workshops without borders)
- · Romanian Peace Institute PATRIR
- · CNRR- National Romanian Council for Refugees
- · Code for Romania
- · Open Fields
- JRS Romania
- KATYA Hub
- · Rădăutiul Civic Association
- · Bucovina Institute Association
- · EDNAE Association
- · Center for the Comparative Studies of Migration
- DGASPC Suceava (General Directorate of Social Assistance and Child Protection Suceava)
- · Maramures County Council
- · Save the Children
- ASSOC Professional Non-Governmental Association for Social Assistance
- · Autism Baia Mare
- Buna Ziua Copii din Romania Association (Hello Children from Romania Association)
- · Inima de Copil Foundation (Child's Heart Foundation)
- · Olimpic Snagov Sports Club Association
- International Foundation for Child and Family (FICF)
- Q-Arts Association
- YouHub Association
- · Migrant Integration Center Braşov
- SCOP Association (Society for Children and Parents)
- · Profilaxis Foundation of Medical Help
- · ALIAT Asociation for mental Health
- · FDP Protagonists in Education
- · Experts and specialists involved in managing the crisis
- · Ukrainian community members

