EXECUTIVE COMMITTEE OF THE
HIGH COMMISSIONER’S PROGRAMME
STANDING COMMITTEE
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NGO Statement on UNHCR Reform

Dear Chair,

This statement is delivered on behalf of a wide range of NGOs.

The current UNHCR reform, based on regionalization and decentralization, offers the promise of empowering actors closest to operations, who know a specific region best and can work on efficient and practicable solutions. This shift in focus is particularly critical as UNHCR looks to make real the promise of the Refugee Compact. Indeed, the imperative to address humanitarian and self-reliance needs of persons of concern and vulnerable host communities, will require increased collaboration with local actors.

The shift from centralization to regionalization is, however, not a panacea. It must be matched with far-reaching reform at all levels to improve partnership and operational efficiency, increase accountability and, most critically, improve outcomes for refugees, IDPs and other persons of concern. Adequate consultation with NGOs and other stakeholders in the development and roll-out of the reform is key to consolidate the process as it determines the desired quality and sustainability of collective outcomes. It would help refine and concretize change. We therefore propose the following perspectives to be considered:

1. **Moving authority and responsibility from the centre to the regions represents only the first step.** To be complete and adequate, the reform should also look at shifting the focus systematically from regions to country-level structures and from country-level to the actual sites of operation. In particular, there is a clear need to address the missing link, capturing the dynamics between the national level structures and the actual operation sites.

2. **The reform does not provide a once-for-all solution.** Rather, it unlocks the potential for policy makers, managers and operators to ensure progress based on daily conversations throughout the system. The engagement of all concerned should generate multiple benefits in ensuring connectivity, continuity and stability after the transition. Information flow from the ground up should also strengthen the reform with greater participation of and commitment from refugees and other persons of concern. Community-based NGOs are particularly well placed to help catalyse this process.

3. **While advancing protection and sustainable solutions through the reform calls for maintaining some uniformity and stability, the roles and responsibilities at each level should be managed with flexibility, reflecting contextual diversities and best practices.** Beyond the response to pre-determined challenges, the reform should build mechanisms with shock absorption capacities at each level to manage unforeseen circumstances and crises, including for resource mobilization. Regional Bureaus should therefore be empowered to take decisions independently to ensure rapid response while also ensuring that international policies are applied consistently throughout the regions.

4. **The chronic vulnerability and capacity limitations of certain regions merits special consideration in terms of resource mobilization and allocation.** For example, African countries currently hosting many refugees, despite their low economic base, cannot
adequately discharge their responsibilities without increased support. The reform should stimulate such support and provide a strong impetus to strengthen strategic and operational alliances with other regional organizations. A great opportunity is offered by the African Union 2019 theme focused on ‘Refugees, Returnees and IDPs: Towards Durable Solutions’.

5. **Any decentralization should reinforce accountability in terms of checks and balances.** We urge UNHCR to take heightened measures to address and answer complaints and concerns voiced by refugees regarding instances of unethical behaviour from some staff. It is important to avoid future scandals like the ones observed in Uganda and Kenya, that endanger refugees and their protection.

6. **Regionalization must, above all, respond to UNHCR’s operational needs.** Therefore, regional and sub-regional offices should be situated in close proximity to UNHCR’s main operations to maximize efficiency of response, rather than following the model of other UN agencies. It appears that the current process has been principally guided by inter-agency requirements. For example, rather than putting a regional office in Panama to cover the entire Americas, two regional offices should be established: one for Central and North America, and the second in Colombia to cover the Venezuela situation and the rest of South America.

7. **Getting the balance right in terms of human resources also requires serious consideration through the reform.** Refugees and other persons of concern often express a sense of frustration and ambition, which challenges the rather exclusive approach to training and enrolment. The tendency of relying on ‘international experts’ does not represent the silver bullet required to bring about the desired change. More constructively, the reform may turn this into an opportunity, enabling UNHCR and its partners to ensure adequate inclusion of persons of concern as primary stakeholders. Again, the comprehensive nature of the GCR agenda now demands more systematic and creative use of local know-how and talents based on a more balanced mix of engagement including experts, refugees, other persons of concern and the host community. This needs to be consolidated with increased opportunities for an on-going process of mutual learning and exchange built into the reform.

8. **Regionalization should support our shared ambition to provide reliable, higher quality services to our clients.** To do so, it must be coupled with meaningful reforms to partnership practice, including adopting policies consistent with the Grand Bargain, with longer-term awards and multiyear financing. It should also provide for timely communication of budgets and negotiations of Project Partnership Agreements, covering the cost of quality programs. We acknowledge the positive step taken in introducing Multi-year PPAs and to cover, for the first time, 4% of overhead costs for national NGOs, but this is just a first step. To see greater effectiveness of programs, these policies need to be expanded, communicated and consistently applied in the field.

9. **Finally, we call for a more fundamental and comprehensive change to ensure that the new normal, to be established by the reform, is based on greater transparency and accountability.** This should enable all stakeholders, including NGOs, to contribute optimally to the effective implementation of the GCR.

A detailed version of this statement is available on icvanetwork.org

Thank you.