

**NGO Statement on the High Commissioner's Dialogue on Protection Challenges**

Dear chair,

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

Each year, forced displacement due to conflict, violence, disasters, and climate change reaches a new, unprecedented scale – surpassing the previously “unprecedented” levels. 2022 was no exception, with “record levels” of displacement, globally exceeding 100 million. Beyond the sheer magnitude, crises grow more protracted, refugees and IDPs being forced to live in increasingly fragile conditions for longer periods. As the systems and institutions in host countries are increasingly stretched, and as climate change, pandemics, and other dynamics add complexity to traditional humanitarian response, development-oriented approaches must be considered early on to better support the forcibly displaced and their hosts.

In this context, NGOs welcome UNHCR's commitment to improving humanitarian and development cooperation to advance sustainable solutions, as reflected by this year's High-Commissioner's Dialogue and the emphasis on mainstreaming development engagement in UNHCR's Strategic Directions. Related commitments in the High-Level Panel's report and Secretary-General's Action Agenda on internal displacement are also encouraging.

NGOs, in their full diversity, can play a critical role in translating these commitments into action, with measurable targets. Based on our experience, we wish to highlight recommendations framed around four challenges, with the recurring theme of inclusion:

**1. Inclusion in societal structures**

Often excluded from local systems and services, forcibly displaced people cannot meet basic needs without depleting their resources. Solutions require legal frameworks as the basis for enabling inclusion, accompanied by policies that remove structural barriers such as Age-Genders-Diversity specific barriers and the right to work, health, education, legal documentation, and freedom of movement.

In many contexts, broad legislations have established a critical legal basis for refugee rights and protection, along with economic inclusion, for example the Jordan Compact and Kampala Declaration. However, the implementation of legal and policy frameworks remains a challenge. Refugees often face difficulties in realizing their right to work – despite this right being enshrined in international law, especially the Refugee Convention. It is also essential that displaced and stateless people have equitable access to services, including education, healthcare but also security and protection against violence and exploitation.

To promote inclusion of forcibly displaced people in societal structures, **we recommend that UNHCR continue to work with host States to develop robust legal and policy frameworks. UNHCR could**

**further highlight and promote lessons and best practices from existing national policies as the foundation for integration and durable solutions.**

## **2. Inclusion in decision making**

Top-down decisions to prioritize and allocate resources are not sustainable and minimize local ownership. We need mechanisms that allow people to voice their needs and concerns and contribute to designing durable solutions.

Practically, this often means collecting information directly from displaced and host communities, to obtain a comprehensive, evidence-based understanding for effective programming. In many protracted contexts – Afghanistan, Iraq, Somalia, South Sudan – actors on the ground have collected a wealth of data in support of planning, highlighting the needs, vulnerabilities, coping capacities, intentions, and perceptions on the response. Mechanisms should also be established to gather complaints and feedback on aid delivery and using this feedback to continually improve support and enhance accountability.

**To promote inclusion and transparency in decision making, UNHCR and other policy makers must systematically use information and feedback provided by displaced and host communities to design appropriate, practical, context-specific, and community-led solutions.**

## **3. Ensuring inclusion of displaced and host populations in aid implementation**

Perceiving displaced and host communities as ‘targets’ rather than key stakeholders of aid results in reduced accountability, aid efficiency, and sustainability. A paradigm shift is needed, to put people at the center of coordinating and implementing interventions – breaking down aid siloes and replacing them with bottom-up, community-led approaches.

Humanitarian response structures and habits can be resistant to change. Making coordination and decision-making processes inclusive and accessible from the start helps mitigate fragmented approaches. Greater efforts are needed to leverage local systems, structures, and capacities. Humanitarian and development actors should therefore invest into existing structures, including making space for local actors in top-down coordination systems.

**We, therefore, call for UNHCR leadership in facilitating greater inclusion, ownership, and resourcing to local actors, including organisations led by forcibly displaced people, notably by shifting to a coordination and implementation model aligned with the localisation agenda and framed by a territorial – not sectoral – lens. This approach can leverage local capacities to address multiple needs, rather than build on pre-packaged, sector-based solutions developed externally.**

Donors must also play a leadership role in fostering greater inclusion at response level including breaking down ‘humanitarian’ and ‘development’ siloes within their own internal structures. NGOs experience these siloes inefficiencies, as both portfolios of donors are not always interacting, or even aware of, each other. **We encourage donors to develop flexible and integrated funding strategies bridging this divide. Making institutional funding mechanisms more aligned and accessible to local response and actors, is another concrete way to play a transformative role.**

## **4. Global resource allocation**

In advocating for development-oriented solutions, core humanitarian principles cannot be forgotten: addressing needs wherever they are found, prioritising the most vulnerable, providing aid without discrimination, and remaining uninfluenced by political or economic agendas.

We welcome the incredible funding mobilisation and response over the last six months to support people in the rapidly evolving Ukraine crisis. Simultaneously, we emphasize the equally urgent need to sustain and increase funding and attention in other contexts. Food insecurity, insecurity, conflict, and climate-induced disasters remain key drivers of displacement. **Donor support to people displaced by the Ukraine crisis is to be commended but cannot come at the expense of aid allocations to other severe crises.**

To conclude, we reiterate our support for UNHCR's mandate and renew our commitment to collaborative engagement.

Further details are available at [icvanetwork.org](http://icvanetwork.org)

Thank you.