



# Coordinating 10 years of collective NGO advocacy at UNHCR's governing body meetings

Stakeholder perspectives and impact

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## Acronyms

AGD: Age, Gender, and Diversity	MS: Member States
AI: Anonymous Interview	NGO: Non-Governmental Organisations (in all their diversity)
ATD: Alternatives to Detention	RLOs: Refugee-Led Organisations
CA: Critical Analysis	SCom: Standing Committee
CBP: Community-Based Protection	TA: Thematic Analysis
CDA: Critical Discourse Analysis	WHS: World Humanitarian Summit
CVA: Cash and Voucher Assistance	
ExCom: Executive Committee	
FDP: Forcibly Displaced Persons	
FTS: Financial Tracking Service	
GBV: Gender-Based Violence	
GCR: Global Compact on Refugees	
GRF: Global Refugee Forum	
IASC: Inter-Agency Standing Committee	
ICVA: International Council of Voluntary Agencies	
IDPs: Internally Displaced People	
INGOs: International Non-Governmental Organisations	

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## EXECUTIVE SUMMARY

Over the past decade, ICVA has coordinated collective NGO statements at UNHCR's Executive Committee (ExCom) and Standing Committee (SCom) meetings to elevate shared humanitarian concerns and influence global refugee policy. This study assesses the effectiveness of those statements and the consultation processes behind them, with the aim of strengthening future advocacy and ensuring it better reflects NGO priorities, including those of organisations led by forcibly displaced and stateless persons.

**Purpose and scope:** Commissioned by the Forced Displacement team of the International Council of Voluntary Agencies (ICVA), this report seeks to enhance understanding of the **effectiveness of consultation with NGOs and related advocacy as reflected in collective NGO statements delivered at UNHCR's Executive Committee and Standing Committee meetings over the last ten years.** The objective is to inform future advocacy by better aligning messaging and strengthening NGO coordination, ensuring impact on the ground. This study aims to:

1. Identify any discernible **trends in topics** covered in the NGO collective statements and their evolution over the past ten years.
2. Assess the NGO collective statements' **impact on policy and practice**.
3. Evaluate the effectiveness of ICVA's consultation processes in influencing **advocacy positions that really matter** to NGOs, including organisations led by forcibly displaced and stateless persons.

**Methods:** This three-stage research employs a qualitative approach, combining thematic, critical discourse and content analysis, as well as interviews with nine stakeholders from NGOs and Member States. It examines ICVA's archive of NGO collective statements from UNHCR ExCom and SCom meetings (2015-2024) to trace the evolution of advocacy priorities.

## Key findings

Across a decade of UNHCR governing body meetings, NGO interventions have contributed to shaping the discourse on key thematic areas, an important outcome for influencing policy.

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Four macro-themes have dominated policy discussions in the past ten years, reflective of geopolitical changes and a global pandemic. NGOs have been responsive to, and proactive with, recommendations to address refugee protection concerns.

### **1. State securitisation and externalisation**

- NGOs noted a sharp rise in securitisation and externalisation measures from 2015 onward, peaking in 2021, outlining how States increasingly used border control, deterrence, and criminalisation measures, limiting asylum access and undermining rights.
- In response, NGOs consistently pushed for adherence to international law, highlighting the human impact—particularly how criminalisation harms dignity and self-reliance.
- State key informants acknowledged that personal narratives and practical, solution-oriented recommendations had greatest impact. Some sensitive issues are most effectively addressed through closed-door diplomacy.

### **2. Inclusion**

- NGO statements consistently emphasised access to services, age, gender, and diversity (AGD) considerations, human rights, and family reunification. From 2016–2019, NGOs shifted from opportunity-focused to rights-based narratives, strengthening calls for refugee participation and data disaggregation.
- These calls correlate with related milestones at UNHCR such as increased youth and refugee participation at UNCHR events, growth in state practices of appointing refugee advisors, and the shaping of policies and practices around AGD and complementary pathways.

### **3. Funding and cooperation**

- NGOs moved from highlighting budget unpredictability and coordination challenges (2015–2017) toward structural critiques of humanitarian financing, including the funding inequalities between crises, and short-term cycles which undermine self-reliance. NGOs started calling for flexible, multi-year, and equitable funding, along with greater private sector engagement.
- The statements highlight how NGOs collectively and in all their diversity have been pioneers in challenging the traditional top-down funding model.

### **4. The emergence of a localisation agenda**

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- Localisation gained momentum from 2018 onward, with growing emphasis on Refugee-Led Organisation (RLO) leadership. Early advocacy focused on community participation and capacity-building. Later years demanded direct space, funding, and decision-making roles for refugees and local actors. The [2024 General Debate](#)—written and delivered by an RLO—marked a turning point.
- UNHCR frameworks reflect increasing commitment to localisation (Community-Based Protection (CBP), IDP engagement policy, emergency preparedness guidelines, 2025 operational localisation guidance). However, systemic barriers remain—funding gatekeeping, compliance requirements, donor risk aversion. Furthermore, the lack of a shared definition of “local” leads to blurred boundaries between ‘local’ and ‘international’ actors and perpetuates unequal power structures.

Overall, collective NGO statements have played a meaningful agenda-setting role, particularly in framing discourse on localisation, AGD, and funding reform. However, their influence on state behaviour varies considerably and depends on timing, alignment with UNHCR priorities, and the extent of NGO coordination.

Collective NGO statements shape discourse and policy most effectively when a) grounded in lived experience, b) developed in a structured and coordinated way, and c) aligned with UNHCR policy windows. Localisation and refugee leadership are the fastest-growing areas of influence.

## Summary of recommendations

The study proposes ways to strengthen ICVA’s consultation processes and maximise the strategic value of collective statements:

### 1. Expand access to decision-making fora

- Reduce practical and financial barriers to participation, including through partnerships and improved virtual engagement.
- Maximise coordination between local NGOs and large NGO intermediaries to ensure balanced representation.

### 2. Confidential and cooperative engagement

- Leverage informal spaces in Geneva and build targeted relationships with receptive Member States.
- Pursue joint initiatives with strategic State representatives.

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### 3. Localisation efforts

- Attract more flexible, long-term funding from both State and private donors for refugee responses.
- Prioritise equitable risk-sharing in partnerships between NGOs and INGOs.
- Maintain consistent emphasis on meaningful refugee-led leadership.

### 4. Strategic refugee-led advocacy

- Combine legal and data-driven analysis with personal testimony to maximise influence.
- Present concrete examples of successful policies or practices.
- Focus collective statements on issue-specific, actionable asks.

## 1. Introduction

The role of NGOs within UNHCR's Executive (ExCom) and Standing Committee (SCom) meetings has undergone significant evolution. Functioning as the primary liaison between the global NGO community and UNHCR, ICVA is instrumental in coordinating NGO engagement within these governance structures, ensuring that humanitarian responses to forced displacement consider NGO priorities and perspectives, particularly around international human rights and refugee laws.

By consolidating and amplifying NGO perspectives, ICVA seeks to influence policies and practices affecting asylum seekers, refugees, internally displaced persons (IDPs), vulnerable migrants, and stateless individuals. Despite a decade of collective NGO statements coordinated by ICVA at ExCom and SCom meetings, the degree to which these contributions have shaped policy discussions, influenced decision-making, and affected stakeholder perceptions remains largely unexamined.

### 1.1 Research objectives

This report seeks to enhance understanding of the effectiveness of ICVA's current NGO consultation model and the use of collective statements as an advocacy strategy. By assessing the impact of NGO statements on UNHCR, Member States, as well as NGOs, the findings will inform future strategies to strengthen collective advocacy efforts.

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To achieve this, the research is guided by the following key questions:

1. Have there been any discernible trends in topics covered in the NGO collective statements?
2. To what extent have NGO collective statements had any policy or practice impact? If so, which ones and for whom?
3. How effective has ICVA's consultation processes been in supporting collective advocacy and influencing positions that really matter to NGOs and the communities they represent?

## 1.2 UNHCR's committee meetings and stakeholder perspectives

The ExCom and SCom are pivotal in setting international refugee protection standards, serving as the primary governance mechanisms where policy norms are debated and disseminated. Throughout the years, these fora have played an invaluable and crucial role in both persuading and “acculturating” governments towards the adoption of refugee protection norms (UNHCR, 2008b).

Key outcomes of these discussions are the ExCom General Debate, its conclusions, and agenda items such as the notes on international protection. Notes are particularly critical for identifying protection challenges, assessing how they have been addressed, and providing strategic foundations for NGOs advocating for policy changes (UNHCR, 2000). While not legally binding, ExCom Conclusions on International Protection hold significant weight as a reflection on state practice. They contribute, albeit as soft law, to judicial pronouncements on matters of policy, legal practice, and interpretations (Sztucki, 1989).

A critical research gap exists regarding the concrete effects NGO collective statements have on state attitudes toward refugee protection.

Effective advocacy within UNHCR's governance structures depends not solely on the advocacy messages themselves but also on the interaction between UNHCR officials, Member States (MS), and NGOs in response to those efforts. It is essential to note the influence of ExCom meetings among various stakeholders, as they serve different functions:

- For **UNHCR**, these meetings provide a foundation for policy direction, operational guidance, and advocacy when engaging with MS.

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- For **MS**, they serve as a reference for shaping national refugee policies, though their application is dependent on political will.
- For **NGOs**, these meetings can become advocacy tools to hold actors accountable, push for stronger commitments, and reinforce international protection standards.

Some studies highlight instances where NGO advocacy has had significant impacts, namely in community-based protection approaches (Dempster and Hargrave, 2016), the incorporation of refugee voices into global processes (Milner, 2022; Lenette et al., 2020), and heightened focus on issues of statelessness and urban displacement (UNHCR, 2014; Blitz, 2017). However, observations in this area remain fragmented and lack thorough systematic analysis. Moreover, the existing literature points to a clear deficiency in longitudinal analyses tracing the evolution of specific advocacy messages since 2015. This absence is significant as it prevents a thorough examination of how particular NGO statements correlate with evolving policies within UNHCR and national frameworks. Although some reports, such as those produced by ICVA in 2022, have aimed to assess the effectiveness of collective NGO advocacy models and their influence on UNHCR's strategic direction (ICVA, 2022b), findings continue to be limited to specific and shorter time frames.

This report aims to fill gaps by providing insights into the evolution of NGO statements from 2015 to 2024, ultimately contributing to a more coherent framework for understanding the interplay between advocacy and policy within the context of forced migration and refugee protection.

### 1.3 Advocacy at UNHCR

Advocacy is a key component of UNHCR's mandate. It can be defined as a deliberate process, grounded in demonstrated evidence, aimed at directly and indirectly influencing decision-makers, stakeholders, and relevant audiences to support and implement actions that contribute to effective humanitarian outcomes (Global Protection Cluster, 2014; ICVA, 2016a). Central to this definition is UNHCR's advocacy objective, which seeks to reinforce the responsibilities of both state and non-state actors in protecting forcibly displaced persons (FDPs). While advocacy is widely recognised as essential for improved refugee protection, existing literature reveals numerous structural and political challenges impeding its effectiveness (Milner, 2020; Fresia, 2014).

One of the primary challenges facing the UNHCR is its advocacy capability, which is often compromised by the politicised environment in which it operates and its financial reliance on donor

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states (Loescher, 1993; Fresia, 2014). This reliance fundamentally restricts UNHCR's ability to adopt more direct approaches, often at the expense of holding states accountable for violations of refugee protection norms. This issue not only affects UNHCR stakeholders but also extends to the broader landscape of States and NGOs themselves. As identified by Milner et al. (2022), heightened pressures to maintain relationships limit advocacy effectiveness, compelling organisations to navigate political sensitivities cautiously in order to avoid tensions.

In this politicised context, the nature of advocacy for FDPs varies significantly among the actors operating within UNHCR's framework. The literature distinguishes between "soft" and "hard" advocacy strategies, noting that UNHCR primarily engages in soft advocacy (UNHCR, 2008a; 2008b). This encompasses activities such as awareness-raising, training, and quiet diplomacy, which aim to subtly influence stakeholders and foster long-term cooperation (UNHCR, 2007). Conversely, NGOs often employ a wider array of advocacy tactics, combining both soft and hard techniques (Fresia, 2014). Scholars have identified several primary advocacy models utilised by NGOs within the UNHCR setting:

1. **Evidence-based advocacy**—focuses on presenting research findings, field reports, and case studies to inform decision-making through data-driven arguments.
2. **Legal-based advocacy**—centres on utilising legal frameworks, human rights instruments, and international protection mechanisms to ensure states meet their obligations in upholding the rights of FDPs.
3. **Capability-based advocacy**—aims to empower FDPs by emphasising their self-reliance and resilience.
4. **Collaborative, or partnership-based advocacy**—seeks to build coalitions across varying actors to amplify advocacy efforts.

Despite a robust body of literature discussing the diverse approaches employed by NGOs, research assessing the tangible impacts of specific advocacy tactics on policy outcomes or shifts in stakeholders' perspectives remains sparse. Scholars have yet to focus sufficiently on identifying the most effective advocacy strategies in the Geneva humanitarian setting. More recent studies, such as those by Baldo (2016), emphasise a critical overarching principle in advocacy approaches: the recognition of human dignity. This principle serves as a foundational guiding principle of advocacy efforts, suggesting that the acknowledgment of forced displacement as human beings engenders a collective sense of responsibility among stakeholders. As the

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challenges of coordination among disparate actors persist, understanding and advancing effective advocacy models becomes increasingly essential for the protection of FDPs.

An emerging model, and one that is solidified within the framework of the [Global Compact on Refugees](#) (GCR) relates to the meaningful participation and influence of refugees in policy processes. This is demonstrated by the significant and increased presence of refugee leaders and representatives from refugee-led organisations in these governing body meetings.

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## 2. Methodology

This study employed a qualitative research approach centred on desk-based research and key informant interviews, consisting of three stages and drawing on three main sources of data respectively. A preparatory stage involved data classification, in which relevant sources were gathered from ICVA and UNHCR databases and categorised. This was followed by a systematic review of relevant literature to ensure an evidence-based foundation for the study. In the third stage, UNHCR policies and frameworks were examined to discern alignment with the relevant NGO collective statements.

### 2.1. Scope and limitations

This independent study is the first of its kind to analyse the impact of NGO advocacy on UNHCR. As such, this research provides ICVA with recommendations to strengthen their collective statement strategy and offers humanitarian stakeholders valuable insights to guide international responses to displacement. Recommendations are informed by a comprehensive analysis of stakeholders' perspectives and suggestions to address the key challenges identified.

Inevitably, this study presents limitations. The analysis draws on ExCom statements and SCom June/July discussions on international protection, and integrating consultations reporting, side events, and miscellaneous agenda items only as contextual material where they offer valuable insights. As regards analytical frameworks, the qualitative nature may introduce additional limitations. Interviews may prove limited as they cannot comprehensively capture all stakeholders' perspectives due to sample size constraints and key informants' varied engagement with UNHCR developments. Due to the disruptions caused by the US funding cuts at the time of writing, UNHCR stakeholders could not participate in the research; however, MS representatives provided compensatory insights. While the target audience of NGO collective advocacy extends beyond the UNHCR to States and local governments, its impacts was solely evaluated against UNHCR policies and frameworks, with contextual information on domestic landscapes. Lastly, it is important to note a gap in the coverage of climate-related issues, which could not be fully explored due to space and time constraints. Had these limitations not existed, climate-related advocacy would have formed a fifth macro-thematic focus.

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### 3. Findings

As outlined in the introduction, four macro-themes have dominated policy discussions in the past ten years, reflective of geo-political changes and a global pandemic. NGOs have been responsive to, and proactive with, recommendations to address refugee protection concerns. The macro-themes were categorised as:

- (1) State securitisation, externalisation, and legal dimension;
- (2) Inclusion;
- (3) Funding, cooperation, and the emergence of a localised approach;
- (4) Localisation.

These emerged as the most prominent patterns across the data, reflecting key priorities and challenges in advocating for refugee protection and effective humanitarian response.

The findings reveal the tactics and tools which have been the most effective when navigating politically sensitive topics, outlines formulas for meaningful engagement and participation, and reflects on the limitations of NGO advocacy in influencing UNHCR policies.

Perhaps some of the most notable advances in policy and practice have been around inclusion and participation, while several remaining barriers have been identified.

#### 3.1. State securitisation, externalisation, and legal dimension

##### Trends and mechanisms

A consistent theme in NGO advocacy at UNHCR governing body meetings has been the rise in State securitisation, often a driver of externalisation policies. From 2015, a steady rise in references to border control, restricted access, and the criminalisation of asylum seekers was observed in NGO statements, peaking in 2021. Likewise, the topic of externalisation gained prominence post-2020. Although states' hardening stances since the large-scale displacement to Europe from 2015, exacerbated by the COVID-19 pandemic, could explain the trend of restrictive State asylum and migration policies, they also created a policy window that sparked corresponding advocacy concerns.

**Despite consistent efforts from NGOs to challenge problematic practices, collectively with UNHCR, the ability to influence the positions of States was observed to be limited.**

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Legal and human rights concerns have been raised annually, broadly aligning with discussions on externalisation and securitisation.

NGOs promote adherence to human rights frameworks, stressing that “*criminalisation impedes self-reliance*” (AI, 2025a) and causes direct harm to individuals, beyond its policy implications. Research supports this statement, highlighting the need to challenge the criminalisation and perceived ‘non-innocence’ of FDPs, as these practices lead to externalisation and interception at sea, severely impacting personal safety and human dignity (Carrera et al., 2023; Baldo, 2016).

Partnerships, including informal cooperation in Geneva, are highly valued, and government officials are “*working hard to overcome visa-related bureaucratic obstacles faced by refugee leaders*” (AI, 2025i) to participate in global policy discussions. These developments underscore a dynamic shift in the advocacy landscape, where NGOs are increasingly focusing on specific human rights issues while some states are acknowledging the importance of localisation and partnership, ultimately shaping a more responsive and inclusive approach to displacement.

## State Securitisation, Externalisation, and Legal Dimension

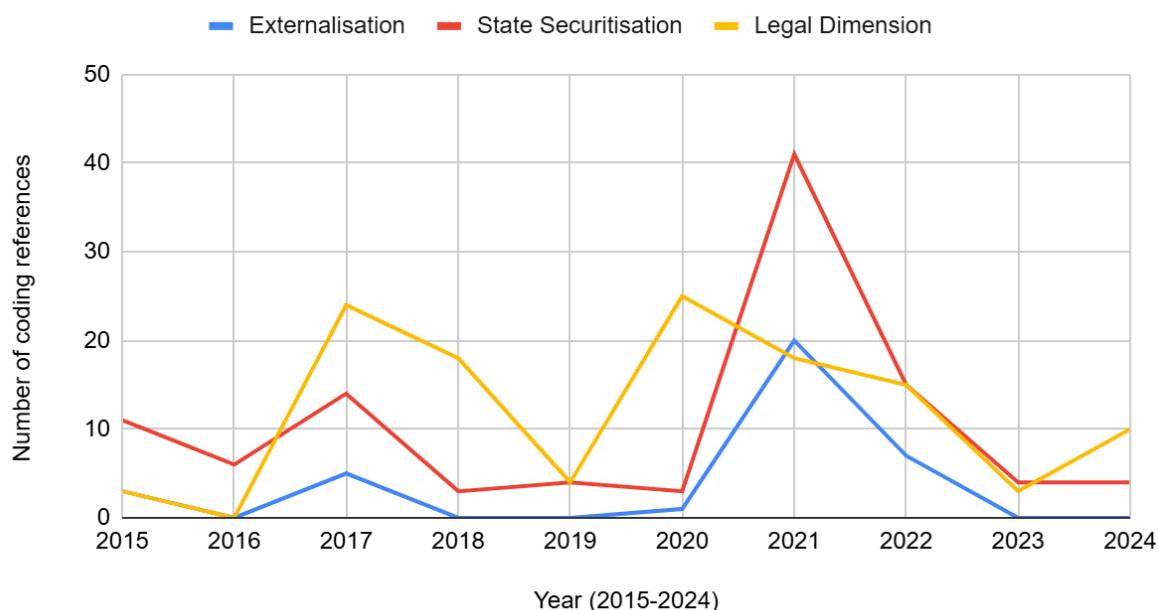


Figure 1. Coding chart for State Securitisation, Externalisation, and Legal Dimension.

To address refoulement and unlawful detention concerns, NGOs leverage strategic coalition-building and a combination of data-driven, legal, and humanitarian arguments. As one NGO

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representative observed, “*International law is flexible and will not always compel States to act. Diplomats feel moved by stories, and we need to target their humanity without crossing the line*” (AI, 2025f). Interestingly, this preference was echoed by a MS representative, highlighting that the most compelling NGO interventions are those driven by passion and personal experiences; those explaining “*why NGO leaders are there and why they are passionate about humanitarianism*” (AI, 2025d). This suggests that, during ExCom proceedings, **statements that combine a strong sense of accountability with emotionally resonant narratives have the greatest diplomatic impact**. Both MS and NGO representatives agree that **pragmatism and strategic thinking are essential for achieving advocacy objectives. A balance needs to be ensured to avoid tokenism when forcibly displaced or stateless leaders draft and deliver statements**.

Moreover, findings revealed that NGO priorities may diverge from those of States, requiring them instead to “*operate in legally ambiguous environments as they negotiate with growing numbers of de facto authorities and transitional caretaker governments*” (AI, 2025c). Thus, as a government representative disclosed, sensitive matters, such as increased humanitarian support in affected areas, security, and externalisation, might be more effectively discussed in “*closed-door events*” (ibid.). It was reported that one government incorporated the perspectives of affected populations into its policy development on the Myanmar crisis by connecting with a local RLO member, who “*shared honest, on-the-ground assessments in full confidentiality*” (ibid.). This approach can enable States to direct international support appropriately while maintaining diplomatic discretion, **testifying to the increasing relevance of private negotiations as a successful form of international engagement** (Michalski & Pan, 2017). In the process, NGOs would illustrate geographically diverse examples of good practices, operational knowledge, and potential efficiency gains to support the implementation of recommendations: “*it’s useful for NGOs to think about how they can assist States in practice*” (AI, 2025e). **Especially as tensions rise between funding constraints and humanitarian needs, evidence of the feasibility of impacts becomes more critical than ever for donor evaluations.**

**For their part, NGOs recognise that selecting the MS to work with can be equally strategic.** States with problematic policies may deter cooperation altogether, as NGOs “*find it difficult to engage with governments that facilitate refoulement*” (AI, 2025a). While governments acknowledge that “*being held accountable and remaining open to dialogue is necessary*”, they are more likely to engage when NGOs “*frame their advocacy in line with States’ realities*” (AI,

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2025c). This underscores the delicate balance NGOs must strike: asserting legal and humanitarian principles while maintaining a pragmatic approach that fosters State cooperation.

## Impact on UNHCR policy and practice

Despite NGOs' persistent advocacy efforts, their influence on UNHCR frameworks remains largely constrained by political landscapes defined by States (Betts et al., 2012). Albeit in a non-binding manner, UNHCR has long reiterated that national security concerns should not override international protection obligations or lead to policies that criminalise asylum seekers. Over time, normative frameworks and guidelines have evolved to reinforce legal arguments against practices that jeopardise protection.

The 2014-2019 'Beyond Detention' strategy (UNHCR, 2014) emerged in response to the increased use of detention as a deterrent rather than a last resort (as seen in the EU-Turkey deal, US-Mexico policy, and Australia's offshore detention regime). This strategy recognises that even the most stringent policies fail in curbing irregular migration, thereby highlighting the necessity for 'Workable Alternatives to Detention' (ATD) to meet governments' security objectives and protection obligations (UNHCR, 2014). Within this context, UNHCR's Position on the Detention of Refugee and Migrant Children (2017) advocated for alternatives that balance humanitarian with public order concerns. As this framework gained momentum post-2016, it appears correlated with the spike in advocacy on these issues.

Additionally, UNHCR-NGO partnerships were encouraged as part of emergency response programmes, notably in Greece, where search-and-rescue (SAR) efforts were supported via the provision of training and equipment (UNHCR, 2015a). Monitoring and evaluation mechanisms were established for ten focus countries, required to produce reports to contribute to a broader consolidation framework (UNHCR, 2014). In 2018, crucially, the Global Compact on Refugees (GCR) was launched. **By enhancing self-reliance and responsibility-sharing, it countered securitisation and externalisation tendencies via a focus on access to third-country solutions and safe returns.**

In 2021, UNHCR expressed open opposition to externalisation, asserting that such arrangements "contradict the spirit of the GCR" (2021). **This could suggest that some NGO advocacy efforts were effective, as official discussions on externalisation took place during the period when advocacy against it was strongest (Figure 1).** That year, the Global Consultations on Protection Challenges also touched on the externalisation of asylum and migration policies as

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part of the Three-Year Strategy on Resettlement and Complementary Pathways (2019), mandated by the GCR. These discussions contributed to shaping third country solutions for refugees, expanding beyond resettlement to complementary pathways such as labour mobility, education visas, and family reunification. This is inscribed within broader frameworks of evolving guidelines and policy positions that continue to shape contemporary advocacy against securitisation and externalisation.

While “*combating securitisation and externalisation as a whole seems unfeasible*” (AI, 2025a), according to an NGO interviewee, addressing their practical impacts is essential. The 'Unlocking Rights' policy paper exemplifies this by promoting Alternatives to Detention (ATD) and quantifying the cost savings compared to immigration detention (Figure 2). This approach, which reconciles financial pragmatism with humanitarian responsibility, found support from a Member State (MS) respondent who poignantly asked, “*What does opening up national legislation to forcibly displaced people signify, beyond dollar amounts on a sheet?*” (AI, 2025c). Ultimately, a comprehensive solution, one that balances humanitarian needs with financial constraints is vital for driving substantive change.

State	Date of data collection	Cost of Detention (per person per day)	Cost of ATD (per person per day)
Australia <sup>92</sup>	2015	AU\$ 655	AU\$ 8.80 to AU\$ 38
Austria <sup>93</sup>	2015	€ 120	€ 17-24
Belgium <sup>94</sup>	2014	€ 180 - 190	€ 90 in a family unit
Canada <sup>95</sup>	2019-2020	CA\$ 200 - 400	CA\$ 10-12
Hong Kong <sup>96</sup>	2015		HK\$ 108
Indonesia <sup>97</sup>	2015		US\$ 8
United States <sup>98</sup>	2018	US\$ 208	US\$ 5.89
Slovenia <sup>99</sup>	2014	€ 15.10	€ 0 - 9.29
United Kingdom <sup>100</sup>	2022	£107	

Figure 2: Cost of Detention vs ATD (UNHCR, 2024: 18).

## 3.2 Inclusion

### Trends and mechanisms

A second recurring topic in NGOs' delivered statements is inclusion. This section brings together two smaller themes identified in the statements: “access to care and opportunities” and “human

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rights,” with reference made to AGD, education, employment, legal aid, and broader social and human rights considerations. Whilst their prominence has fluctuated in response to global crises and shifting policy priorities, they were perceived by all interviewees as being a case where NGOs amplified advocacy, with “*AGD language being effectively incorporated in the policy space*” (AI, 2025f).

Discussions around access to care and opportunities began gaining traction prior to 2015, but were still treated as an average priority among other themes (Figure 3). A significant shift occurred in 2016 and 2017, with family reunification, socioeconomic opportunities, and resettlement becoming central themes, driven by the General Debate’s framing in 2016 as “*the year to listen*” and 2017 as “*the year to act*” (ICVA, 2016b; UNHCR; 2017). However, as an NGO leader highlighted, “*it was not until 2018 that family reunification started to be framed as a fundamental right rather than an opportunity*” (AI, 2025e). This shift towards a human dignity-based approach, prioritising “*the individual right of refugees to be with their families*” (ibid.), resulted in a stronger emphasis on rights-based advocacy from 2018 to 2019.

When the Global Refugee Forum (GRF) took place in 2019, conversations were reignited about education and meaningful refugee participation, with NGOs pushing for greater inclusion of refugees (especially youth) in policy discussions. Amplifying the voices of young people and women, thereby leveraging the emotive resonance of their stories, proved fundamental to address the needs of marginalised communities: “*They speak stronger than bureaucratic representatives*” (AI, 2025h). Yet, statements reveal that legal and evidence-based advocacy were equally important, for we cannot “*know who is currently left behind*” without availing of “*disaggregated data on age and sex*” (ICVA, 2016d). Questions about what constitutes ‘meaningful’ refugee participation were also raised at this time, in line with the language laid out in the GCR.

During the 2020 pandemic, access to health care and mental health support became central advocacy issues, but progress on AGD was undermined by a “shadow pandemic” of gender-based violence, with 65%-97% of women reporting abuse (ICVA, 2020). This crisis underscored how emergencies disproportionately affect marginalised populations, exacerbating vulnerabilities (Chetry, 2024) and emboldening NGOs’ advocacy for ad-hoc humanitarian responses. Finally, since 2021, attention to inclusion-related issues centred on minority groups, with “*greater space for them in panels and platforms*” (AI, 2025h) and increased refugee participation beyond symbolic and tokenistic engagement.

## Social Inclusion (Access to Care and Opportunities and Human Rights)

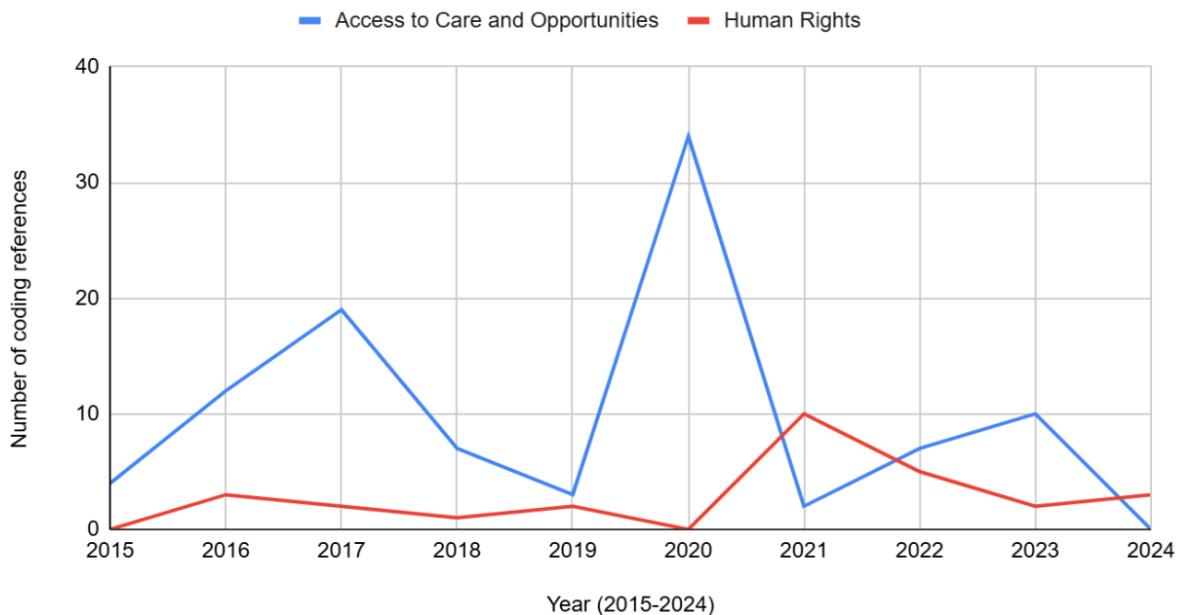


Figure 3. Coding chart for Social Inclusion.

## Impact on UNHCR policy and practice

Examples emerged where NGO advocacy aligned with and even influenced aspects of UNHCR's policies and operational priorities, especially in terms of how social inclusion, legal protections, and refugee participation are implemented. A key milestone was the introduction of a youth-focused approach in 2016, when 30 refugee and stateless youth participated as speakers and moderators in the UNHCR-NGO Annual Consultations (UNHCR, 2016c). This shift toward inclusive engagement was followed by the adoption of UNHCR's AGD Policy in 2018, which explicitly emphasises the importance of understanding how intersecting identities shape experiences of forced displacement and statelessness for effective humanitarian responses (2018b). Although implementation challenges remain, particularly in data collection on marginalised groups and dedicated resources for AGD-focused programming, NGO advocacy was seen to play a part in ensuring that gender-related commitments were embedded in the provisions. An NGO member with previous experience at UNHCR stated that "*we would not have had conclusions regarding refugee women and children if it wasn't for NGO advocacy*" (AI, 2025h).

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Since 2018, the GCR has further solidified state commitments to inclusion, responsibility-sharing, and expanding third country solutions for refugees. Notably, it took three years of related discussions for family reunification to compose part of complementary pathways (UNHCR, 2022; AI, 2025e). However, rights-based approaches did not always receive consistent support when applied to LGBTIQ+ issues (Chen, 2024). As one NGO respondent highlighted, *“these topics remain politically contentious and even dangerous to advocate for”* (AI, 2025f), implying a need for tailored advocacy tactics to engage reluctant states.

In 2020, the COVID-19 pandemic saw the unintentional, yet commendable, promotion of ‘whole-of-society’ approaches facilitated by the increased adoption of digital technologies, through which displaced communities could participate virtually in decision-making processes held in Geneva (ICVA, 2021). Added, the formal representation of refugee leaders in Geneva demonstrated a shift from tokenistic consultation toward meaningful inclusion. An NGO respondent enthusiastically pointed out that *“in 2019 Canada included a refugee advisor in their delegation, and by 2023 over 300 refugees attended the GRF, with 13 countries appointing refugee advisors”* (AI, 2025a).

### **3.3. Funding, cooperation, and the emergence of a localised approach**

#### **Trends and mechanisms**

The trajectory of NGO statements reflects a maturation in advocacy, shifting from pragmatic budgeting concerns to highly specific and evidence-based proposals that address structural deficiencies in the humanitarian finance system. Specifically, in 2015, NGOs primarily focused on improving the efficiency of humanitarian finance mechanisms, emphasising the need for more predictable budgeting on UNHCR’s part, and stronger coordination:

*“For the 2015 crises, funds available were a fraction of the need [...] UNHCR partners were asked to invest [...] in needs assessment and re-prioritisation between different life-saving needs later in the programme cycle. As needs will inevitably exceed funds in 2016, we urge UNHCR to have clear roadmaps in place at the start of the year/response to avoid costly re-prioritisation exercises and potential termination of projects on short notice.”* (ICVA, 2015).

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This critique of the existing funding model reveals NGOs' early recognition of the systemic inadequacies that hindered effective crisis response, laying the groundwork for future advocacy efforts aimed at broader reform. For the next 3 years, NGOs consistently emphasised the significant funding gaps, urging states to "*provide resources in a prompt, predictable, consistent, and flexible manner*" (ICVA, 2016d).

Beginning in 2018, NGOs began to frame funding not just as a matter of resource scarcity but as deeply intertwined with issues of power, state responsibility, equitable partnerships, and humanitarian governance. The comparison between funding for different crises, such as the Ukraine crisis receiving much higher funding compared to protracted crises like Venezuela (ICVA, 2022b), reveals a growing awareness and direct articulation of the financial inequities of the global response within NGO discussions. It moves beyond a general acknowledgment of funding shortfalls to explicitly pointing out the disparities in resource allocations.

Against this backdrop, NGOs increasingly called for creative solutions to financing humanitarian action, such as engaging the private sector as a partner and key source of support (ICVA, 2019). Discussions around the humanitarian-development nexus also became central, demonstrating that short-term funding cycles lead to unstable responses, inefficiencies, and missed opportunities for self-reliance (ICVA, 2022a). These efforts demonstrate a longer-term perspective on effectiveness beyond immediate humanitarian assistance. The trajectory of NGO advocacy, thus, reveals a clear progression from immediate financial concerns toward a strategic, equity-driven vision of humanitarian finance, one that seeks not only efficiency but also a reconfiguration of power dynamics in funding allocation and decision-making.

Following the World Humanitarian Summit (WHS) in 2016 and the adoption of the New York Declaration, NGOs increased their direct calls to action for states, UNHCR, and donors to meet their commitments and address funding shortfalls. Moreover, by establishing new frameworks and commitments, such as the Grand Bargain with its pledge to channel 25% of funds to local and national actors (Inter-Agency Standing Committee, 2024), these global agreements provided NGOs with political leverage, principles, and concrete targets to strengthen benchmarks for their advocacy.

## **Impact on UNHCR policy and practice**

NGO advocacy consistently recognised that humanitarian funding significantly dictates power, priorities, and whose voices are heard. It became clear that NGOs collectively and in all their

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diversity were pioneers in challenging the traditional top-down funding model where international agencies and large INGOs act as intermediaries that control access to donor resources while local organisations and refugee-led groups struggle for funding. The interview findings also painted a picture of a humanitarian system that remains heavily skewed towards INGOs. As one interviewee pointed out, *“the fact that the UN is based in Geneva, one of the most expensive cities, already creates barriers – accommodation and visa costs alone make participation difficult for many smaller NGOs”* (AI, 2025a). This underscores the disproportionate burden placed on small NGOs, especially those based in the Global South, to engage in high-level decision-making processes. The prohibitive costs effectively ensure that INGOs and IOs, with their financial capacity, dominate the conversation.

This is a fundamental power struggle within the humanitarian system, especially with the issue of risk-sharing becoming even more pronounced due to recent U.S. funding cuts. As one interviewee noted, *“In partnerships, risk-sharing is often one-sided; grassroots NGOs are expected to operate under difficult conditions with little financial security, while larger actors control the funding and resources”* (AI, 2025b). As funding from major donors decreases, local actors, already vulnerable due to their lack of financial resilience, are further exposed to the operational risks of humanitarian crises (Barnett, 2011).

While US funding cuts present serious immediate concerns, a MS respondent crucially reframed them as an *“opportunity to accelerate the localisation agenda by diversifying funding streams”* (AI, 2025i). This could be supplemented by a move toward an increase in unearmarked funding, which will allow greater flexibility to direct funds where they are most needed in responses, including to local actors. Notably, Norway’s unearmarked contributions have increased from 41% to 95% over the past 8 years, setting a powerful example for other donors (Figure 4). These steps not only align with NGO calls for more predictable financing structures but can significantly enhance the capacity of local actors as primary humanitarian responders. However, this approach will rely on UNHCR prioritising funding to local NGOs in responses. Moreover, it is necessary too that local NGOs are equally supported with capacity-sharing. If NGOs and UNHCR continue to advocate for flexible, multi-year, and locally-driven funding models, this period of financial uncertainty could in the long run contribute to a more balanced and less donor-dependent funding model.

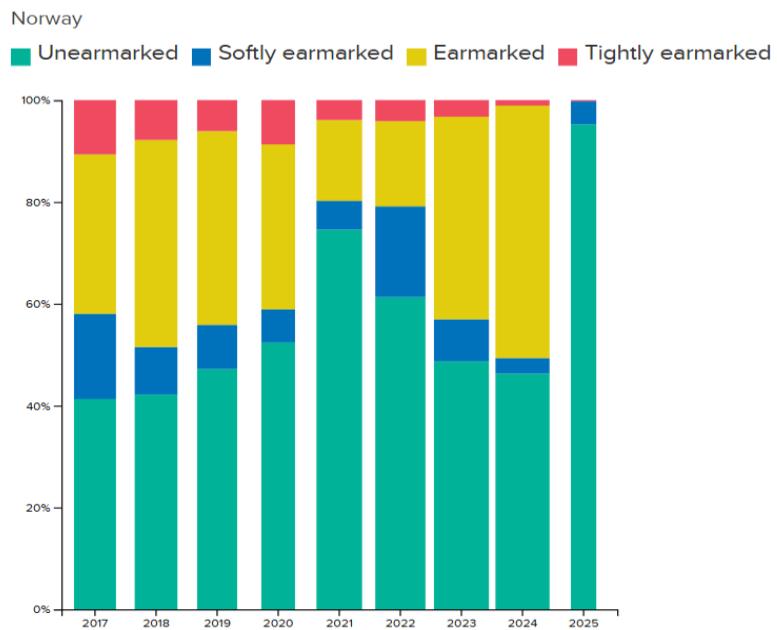


Figure 4: Norway's Earmarking Trend (UNHCR, 2025a).

## 3.4 Localisation

### Trends and mechanisms

In the early years (2016-2017), ExCom statements primarily focused on championing “community participation” and “working with national authorities.” A cornerstone of advocacy at this time is the insistence of evidence-based approaches, where data serves as a critical tool for understanding and addressing the nuanced needs of local communities. Specifically, NGOs emphasised that national NGOs cannot:

*“assume more responsibility and management of larger amounts without additional capacity-building beyond that which is funded by the current budget.”*  
(ICVA, 2016b)

This quote reveals a crucial concern regarding the capacity of national NGOs to assume greater responsibility, highlighting the necessity for targeted capacity-strengthening initiatives that extend beyond existing budgetary allocations. Therefore, this period marked an initial effort to ensure that civil society, not just UNHCR, was recognised as a key player in humanitarian response. The 2017 General Debate statement furthered this dialogue by applauding UNHCR’s emphasis on

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the ‘whole-of-society’ approach, which implied the inclusion of NGOs and other non-state actors in decision-making processes (ICVA, 2017).

However, from 2018 onwards, there was a noticeable shift in the focus of these statements towards the more encompassing term “localisation” and a greater emphasis on the role of RLOs. The 2018 General Debate statement made an explicit call “to create space for displaced populations to organise themselves, plan, and act” (ICVA, 2018). This marked a clear departure from general partnership-building rhetoric to more specific demands for inclusion and empowerment of refugees in both policy and practice. As highlighted by an NGO member, “*there is definitely progress in how accepted localisation is as a topic*” (AI, 2025f). These trends continued to build momentum, culminating in the 2024 General Debate statement, the first to be ***drafted and delivered by an RLO*** (ICVA, 2024a). This milestone illustrated a concrete move towards amplifying the voices of local actors, marking a moment of progress in giving refugees not just a platform but a direct role in shaping the humanitarian discourse. In the words of an NGO respondent, “*NGOs truly won in the area of refugee participation: the space in Geneva has started to open up*” (AI, 2025g).

While the period from 2018 onwards indeed saw a growing emphasis on a concrete localisation agenda, this progression is not without its inconsistencies. The 2021 Regional Consultations, with their focus on 'Localization of humanitarian action and engagement with communities in the COVID-19 context' (ICVA, 2021b), demonstrated a growing awareness of localisation's significance. Despite this, General Debate statements in 2020 and 2021 notably lacked any mention of localisation (Figure 5). Instead, discussions pivoted towards urgent concerns such as COVID-19 response and funding challenges. This divergence indicates a reactive approach to humanitarian policy. While immediate crises undoubtedly require attention, it was at the expense of progressing the localisation discussions. Moreover, the COVID-19 context could have provided some interesting insights on locally-led action. What was notable during this time was that, in some responses, local actors took the lead where international organisations and INGOs had taken a step back.

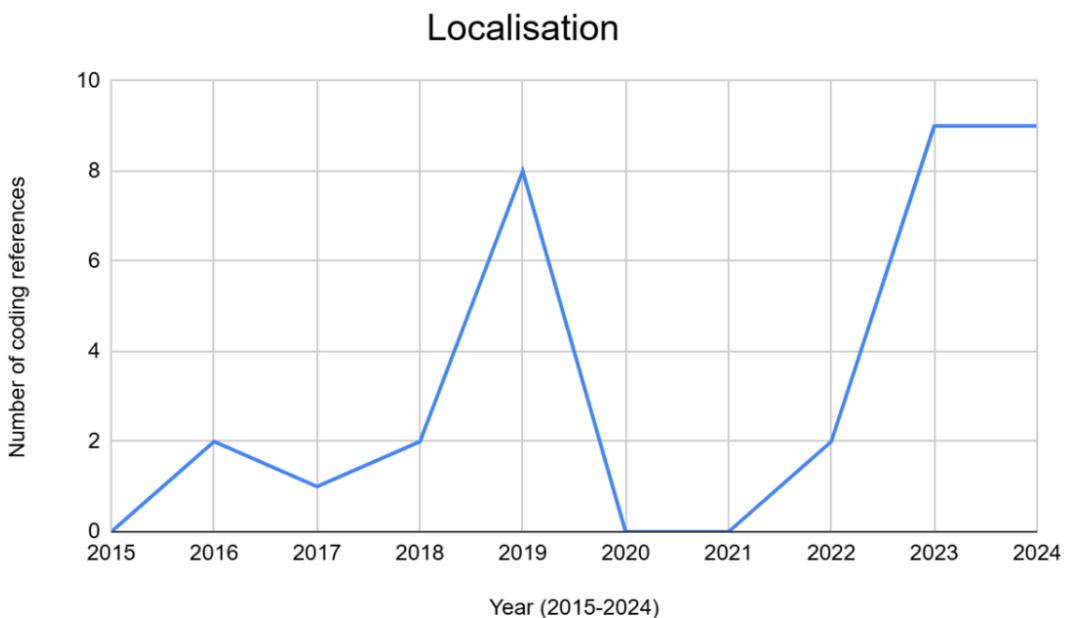


Figure 5. Coding chart for Localisation.

## Impact on UNHCR policy and practice

While it would be reductive to attribute UNHCR's localisation trajectory to NGO advocacy alone, the convergence of NGO calls for systemic change and the institutional response from UNHCR suggests a reinforcing dynamic. Following commitments made at the WHS and the progress of the Grand Bargain, UNHCR has increasingly prioritised localisation, translating global pledges into concrete policy and operational frameworks. The Partnership Management for Emergency Preparedness and Response guidelines (2024), the Policy on UNHCR's Engagement in Situations of Internal Displacement (2019 onwards), and Community-Based Protection (CBP) not only reflect a growing institutional recognition of local actors' roles but also provide mechanisms to enhance their leadership, capacity, and sustainability in humanitarian response. To note also, UNHCR has a long tradition of working with communities to determine needs, as is illustrated by their application of participatory assessments. In October 2025, [UNHCR released its operational guidelines on localisation](#).

Nevertheless, evaluations of UNHCR's efforts have pointed to ongoing challenges in effectively meeting growing needs and ensuring the long-term sustainability of capacity-strengthening initiatives. As discussed under the previous section, donors still distribute the vast majority of humanitarian financing through INGOs and UN agencies. An interviewee working closely with

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refugee-led advocacy noted that “*less than 1% of humanitarian funding reaches RLOs, keeping local organisations as secondary partners rather than direct recipients*” (AI, 2025a). This stark discrepancy demonstrates that international organisations are reluctant to relinquish financial control, maintaining a system where local actors are treated as subcontractors despite being the first responders in emergencies (Barnett, 2011).

The interviews with RLOs highlighted concerns about structural barriers. Several respondents felt that existing funding and partnership models can unintentionally incentivise INGOs to retain decision-making authority and visibility. As one RLO respondent indeed suggested, “*INGOs may fear that fully implementing localisation would make them less relevant*” (AI, 2025g). This fear exposes a fundamental tension: the perceived need for INGOs to maintain access to resources and visibility, at the expense of genuine local ownership and leadership. While collectively, NGOs in all their diversity have consistently argued that localisation must move toward a more equal distribution of leadership, funding, risk, and decision-making power, donors continue to see localisation as a measure to reduce international operational costs rather than as a means to shift real authority to local organisations (Krause, 2014).

Localisation is evidently more successful in contexts where local actors fit within pre-existing bureaucratic frameworks. Large, professionalised national NGOs (often urban-based) have been able to integrate more easily into donor funding mechanisms, while smaller community-based organisations and RLOs struggle to access resources due to administrative barriers and compliance requirements. The current model of localisation tends to favour actors who already resemble traditional INGOs in structure and governance, rather than those who operate outside these formal systems. Thus, international humanitarian actors still largely control the terms of localisation, deciding who qualifies as a legitimate local partner and imposing conditions on funding that reinforce existing dependencies.

These findings reveal a fundamental issue in the localisation debate, notably the lack of a clear, universally accepted definition of what “the local” means. NGO statements frequently refer to local actors, national NGOs, RLOs, and community-based organisations, but they rarely define who exactly is included in these categories and who is excluded. This raises critical questions about how the term “local” can be used in ways that obscure differences in power, capacity, and legitimacy among actors within affected communities (Roepstorff, 2020). For instance, many ‘local’ organisations are deeply embedded in transnational networks, receiving funding, technical assistance, and strategic direction from international donors. At the same time, many INGOs

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operate with local staff, local partnerships, and long-standing community engagement. By framing localisation as a strict transfer of power from international to local actors, NGOs risk reinforcing the very power imbalances they seek to dismantle. Thus, our findings suggest that the localisation agenda should move beyond a rigid distinction between 'local' and 'international' actors, as these categories often overlap in practice. Rather than framing local actors as inherently more authentic and international actors as purely technocratic, a participatory approach would recognise the interconnected roles they play in humanitarian response.

## 4. Recommendations

The analysis conducted in this report identified advocacy trends from 2015 to 2024, discerning how MS and NGO representatives have perceived shifting priorities and alignment with the policy and practice of UNHCR frameworks. Its findings inform the present section, which will offer recommendations on the implementation of ICVA's collective statement tactic.

The recommendations highlight good practices and opportunities for improvement across four key areas: (1) access to decision-making fora, (2) confidential and cooperative engagement, (3) localisation efforts, and (4) strategic refugee-led advocacy.

### 4.1 Access to decision-making fora

**Address material barriers to access through partnerships.** Smaller NGOs are systematically prevented from participating in high-level decision-making in Geneva due to financial constraints. To address bureaucratic constraints, it is recommended that ICVA further engages with the Swiss and other relevant governments to explore simplified and faster visa application processes specifically for NGO and RLO representatives attending UNHCR-related meetings. This could involve providing letters of support and facilitating communication with consulates.

**Maximise coordination between local NGOs and large NGO intermediaries.** It is recommended to actively support collaboration between both. This can be achieved by creating and promoting platforms for local NGOs and their supporting INGO delegations to connect and prepare for high-level meetings. This practice, already encouraged by ICVA's Guide (2021) and its 8-week information sharing via mailing lists, would be strengthened through formalisation and increased support.

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**Expand possibilities for virtual engagement.** Lessons from the COVID-19 period can be leveraged to improve accessibility to funding discussions for local NGOs, particularly those without ECOSOC status. Increasing options for digital participation in pre-meeting consultations and side events could enable smaller organisations to contribute to discussions, providing a valuable alternative until formal access can be expanded.

## 4.2 Confidential and cooperative engagement

**Maximise opportunities for networking in Geneva.** Strengthening informal partnerships beyond decision-making fora can amplify NGO actors' voices, as relationship-building remains key to shaping policy discussions—demonstrated during the GRF. To strengthen NGO participation in Geneva's humanitarian landscape, it is recommended that ICVA: (1) develop and disseminate resources to empower NGOs to effectively navigate the Geneva ecosystem and identify relevant networking opportunities, and (2) expand the promotion of thematic working groups to foster collaboration and collective advocacy.

**Develop joint initiatives with sympathetic State representatives.** NGOs may benefit from spaces in which to increase strategic engagement with donors, demonstrating how their efforts align with state priorities. Closed-door discussions can be especially effective for addressing sensitive topics not easily resolved in public fora. It is recommended to leverage ICVA's and UNHCR's convening power to broker introductions and organise strategic dialogues between NGOs and donors.

## 4.3 Localisation efforts

**Attract more flexible, long-term funding from both State and private donors.** Rigid funding structures hinder localisation efforts and access to resources of local NGOs, limiting their ability to engage in humanitarian response. Greater access to adaptable funding streams would enable grassroot organisations to retain specialised staff, improve financial resilience, and invest in initiatives such as Accountability to Affected Populations, Participatory Monitoring & Evaluation, and Community-Based Protection.

**Prioritise equitable risk-sharing in partnerships between NGOs and INGOs.** It is important to promote co-leadership models where local actors are equals in planning and implementation, not simply for fairness but also for the organisational survival of smaller NGOs. The [Core Humanitarian Standard](#) could be harnessed by streamlining further joint risk analysis, with

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UNHCR and its partners collaboratively assessing the likelihood and impact of potential risks and developing mitigation strategies. It is recommended to move beyond simply requiring partners to assume risks, and instead involve a shared understanding and responsibility for managing them through joint decision-making, technical support and risk mitigation funds.

**Maintain a strong focus on localisation.** The growing recognition of localisation as an advocacy topic has been remarkable and should remain central to discussions to sustain progress, even in times of crisis. It is recommended to launch public awareness campaigns where refugees can share their stories and connect with wider audiences. Along with side events, utilising social media platforms to highlight refugees' skills, resilience, and contributions to host societies could persuade donors to invest in local initiatives that support refugees and host communities.

#### 4.4 Strategic refugee-led advocacy

**Blend legal and data-driven arguments with personal narratives.** While States prioritise NGOs' concerns that align with their operational realities and value pragmatic advocacy, they are admittedly influenced by emotionally compelling stories. Likewise, studies demonstrating the cost-effectiveness of ATD programmes favoured positive policy developments. It is recommended that human dignity and evidence-based narratives are merged to increase the likelihood of State engagement.

**Present concrete examples of successful policies or practices.** States prioritise the operational viability of NGOs' recommendations. Canada's creation of a Refugee Advisory Board offers an example of good practice, testifying to the positive outcomes of refugees' integration into decision-making processes. It is recommended to share similar success stories to help overcome States' scepticism.

**Focus on issue-specific concerns.** For instance, instead of broadly opposing securitisation, NGOs can focus on specific measures and realistic outcomes to foster positive developments. Two examples are UNHCR's partnering with local NGOs in Greece to support SAR operations, and explicit demands for refugee inclusion in high-level fora, which followed related advocacy trends. It is recommended that advocacy targets are narrowed down to specific, actionable policy changes to drive incremental but meaningful progress.

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