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Save the Children Denmark consultation response to the Danida Draft Information Note re. new Strategic Partnerships with Danish Civil Society Organisations

Save the Children Denmark (SCD) views the draft Information Note as a significant step in the right direction, towards a more relevant and strategic civil society support modality. We acknowledge the hard work that has gone into reaching this stage, and greatly appreciate the opportunity to engage in a consultation process. In the Information Note, SCD is particularly pleased to see the incentives for a prioritization of fragile countries and regions and contributions to the SDGs. Further, SCD is pleased to see the explicit acknowledgement of the value of 'global connectedness' exemplified also by organisations that influence and draw on their international alliances.

Together with Danish Refugee Council and the Danish Red Cross, we share the observation that the draft Information Note does not fully capitalise on the opportunity to *rethink* the approach to civil society support towards something that effectively enables the increased attention to the development-humanitarian nexus. Despite the continued separate budget lines, there is still much opportunity for strengthening the linkages across the substance of the Lot objectives and activities. We also share concerns with respect to the understanding and delimitations of the partnerships approach presented in the current iteration of Lot CIV; again, this is not one that fosters holistic, integrated programming, looking across relevant stakeholders, nor does it support a contextually differentiated approach. Finally, we find that the information note lacks clarity with respect to the assessment under Lot CIV and Lot HUM of organizations' capacity and abilities to work in fragile countries characterized by highly politicized conflicts and/or challenged humanitarian space; CHS is as relevant for Lot CIV as it is for Lot HUM, considering the country categories 1 and 4. We will each propose ways to address these issues.

Below is SCDs list of specific areas of concern in the current iteration of the Information Note together with proposed changes to the text in some cases.

Operationalization of the humanitarian-development nexus:

1. Judging from the application material it would seem that strategic partners would have to develop separate country programmes under each Lot, rather than one joint programme across several lots. This, however, does not support the ambition of breaking up the development and humanitarian silos and incentivise programming within *the nexus*. Second, it challenges the ambition towards reduced transaction costs and more consolidated, strategic engagement between the MFA and its partners.
2. The description of the CIV and HUM lots specify many relevant activities lying within the humanitarian-development nexus. However, there are opportunities to strengthen and facilitate the operationalization of the nexus:
 - To incentivise responses within the nexus, SCD would welcome a more contextually/geographically differentiated understanding of and approach to partnerships under Lot CIV. Partnerships in fragile, humanitarian contexts are very different to partnerships in more stabile contexts, i.e. who to partner with, and the nature of those partnerships. The Civil Society Policy from 2014 contains language that supports

this understanding, and we would like to see this added to the Lot CIV description.

- More attention to the nexus would also be achieved by adding to Lot CIV some of the activities mentioned under Lot HUM that aren't specific to acute emergencies, e.g. around strengthening protection, resilience and self-reliance of vulnerable people in and around conflict- and crisis affected countries.

Regional responses under Lot HUM, and leaving no-one behind:

3. We are pleased to see the mention of the Leave No One Behind (LNOB) principle and the requirement to explain how it will be furthered (p. 10 and 19 in the Information Note, p. 8 in annex 2, and p. 11 in annex 3). Key to the LNOB principle is that it concerns the most vulnerable and marginalised people wherever they are, i.e. within and *between* countries, and as such it is also central to the cross-border migration and displacement streams. The requirement under Lot HUM of a 100% match with the category 5 countries (p. 12) does not, however, support such regional responses to consequences of migration and displacement streams. The acknowledgement of the need to strengthen the “protection, resilience and self-reliance of vulnerable people *in and around* conflict- and crisis affected countries” mentioned under Lot HUM is not supported by the 100 % match requirement. SCD would welcome more flexibility with respect to the country match requirement under Lot HUM.
4. On p. 4 of the Information Note it is stated that “flexible funds will typically amount to 10-15 % of allocations under lot HUM, but may in some cases take up a larger share”. SCD would welcome greater assurance of a larger amount of flex funds, e.g. that it could amount to up to 30%. Of SCD's current HPA allocation, 27% are flex funds. It's a critical instrument that enables us to respond rapidly to acute emergencies and support preparedness in slow onset crises.

The definition of partnerships under Lot CIV:

5. SCD fully supports the prioritisation of multi-stakeholder partnerships and institutional strengthening as crosscutting priority SDGs mentioned in the strategy ('Verden 2030', p. 16) and the similar acknowledgement contained in the Civil Society Policy (p. 6, 14 and 15) that to strengthen the civil society requires partnerships with both rights holders, duty bearers and other relevant stakeholders.
6. In light of the above, we are surprised by the formulation of objectives and activities under Lot CIV. Rather than the somewhat one-dimensional focus on capacity building of civil society partners, as a goal in and of itself almost, we would welcome an elaboration of the enabling environment that is mentioned, and a broader definition of 'partnerships' in general in line with the Civil Society Policy. This is also critical in the context of the focus on fragile states, where there is often an absence of formal local NGOs, and where cooperation across different types of formal and informal stakeholders is required.
7. We note the assessment criteria around local partnerships and capacity development in the application material, and that this will look at capacity development of *communities, national and local organisations, local authorities and/or other relevant actors* (p. 8, annex 3: Criteria 10 A). This suggests a broader understanding of partner engagement than what is reflected in the objective and activities formulated under Lot CIV (p. 3). This just points further to the need for clarification in terms of what appears to be a discrepancy between the objectives and activities under Lot CIV and the assessment criteria around local partnerships and capacity development.
8. Further, Lot CIV should also include more explicit expectations as to what those partnerships should contribute to, in terms of lasting change for the vulnerable and marginalised within different areas (the SDGs, for instance). We note that in the application material (p. 5, annex 3)

applicants are required to explain how they will contribute to the SDGs under each Lot, but it is problematic that the objectives and activities supported under Lot CIV do not explicitly talk to this.

Operational capacity to work in highly politicized armed conflict areas:

9. The majority of the countries in the Lot CIV priority categories (category 1) 'Priority fragile countries' and category 4) 'Priority fragile regions') are characterized by national or local highly politicized armed conflicts. Securing results, access and security for beneficiaries and organizations working in the area, can be very complex and require a different approach than what is taken in the 'stable poor countries' category. Failing to adapt the approach will in a worst case scenario contribute to putting lives at risk, but regardless it will be very difficult to achieve results.
10. In this light we would welcome clarification of how organizations' abilities to work in fragile countries characterized by highly politicized conflicts and challenged humanitarian space will be assessed under the HUM and CIV Lots. A CHS verification/ certification will apply for the HUM lot, but this is not listed in the assessment criteria as a requirement for Lot CIV. Due to the complex and dynamic nature of these settings and the possibility of rapid deterioration to escalated conflict and/or a humanitarian emergency, we strongly recommend to consider that organisations working under Lot CIV in priority fragile countries must be able to show and be assessed on a proven track record in operating in these complex settings and be verified, certified, or in the process of either, against the Core Humanitarian Standard (CHS).

The value add and implications of global connectedness and alliances:

11. While we are pleased to see the recognition of global connectedness, and look forward to demonstrate relevance and value add of being part of an alliance, SCD urges the Ministry to reflect this recognition in the assessment of applications and in the administrative guidelines yet to be developed (referred to on p. 7), so as to ensure that the value add of platforms for catalysing Danish priorities and values into global networks is not overshadowed by inflexible requirements with respect to how such organisations operate on the ground, where they also work through their global alliances.

Leveraging Danida funding through co-financing:

12. We would welcome acknowledgement in the Information Note of the leveraging role that Danida funding can play for the mobilisation of funding from other institutional donors, including from the EU. Flexible Danish funding modalities play a crucial role in obtaining EU funding for both humanitarian and especially for development interventions, and the same applies for other donors. Allowing for greater flexibility for co-financing, Danish support can be scaled up, and thereby provide and increase cost-effective presence, experience, capacity, and influence of Danish actors globally. Strategic partners should have the autonomy to reallocate funds (including from agreed thematic and geographic areas of priority) towards co-financing cooperation with other donors, provided that the engagement reasonably addresses Danish priorities as laid out in the new strategy.

Engaging with the Danish public:

13. We note that 'efforts to strengthen public understanding of and popular engagement in Denmark' is only supported under Lot CIV and Lot LAB (p. 3, 5 and 7). SCD would urge the MFA to add a similar incentive under Lot HUM, also to be in line with the formulation on p. 7 of the Information Note: "strategic partners will be expected to actively explore and propose new ways of engaging

a wider segment of the Danish public around the SDGs, the effects of globalization, migration issues, humanitarian action, international development cooperation and/or development policies”, i.e. issues that are relevant to the contexts under all three Lots not least Lot HUM.

14. Looking at Criteria 17 on popular engagement and development education on p. 12 in annex 3, SCD would strongly urge that the assessment of the standard will also look at volume in terms of members and support persons, i.e. the volume should count. This should inform a proportional relationship between a) an organisation’s track record of ways of engaging the public and what plans they have for engaging the public and b) their actual public anchorage (i.e. volume of members and support persons).

Assessment criteria:

15. Looking at the Lot CIV and Lot HUM specific objectives assessment (Criteria 6 A and 6 B in Annex 3, p. 5), only the first two activities from each of the two Lots, as they’re described on p. 3 and 4 of the Information Note, are listed. SCD is missing a rationale for choosing only the first two, under both Lots.
16. SCD is missing an elaboration of the rationale for the sub-weighting under each of the Lots, incl. the differences between them. For instance, it is not apparent why the various criteria under ‘Capacity’ are weighed differently under each Lot, especially in light of the fact that in Annex 2, p. 2, it is stated that ‘part 1 (i.e. ‘capacity’) of the standard application form shall be filled in only once, covering all lots to be applied for’. It is not apparent why ‘organisation and human resources’, for instance, is weighed and counts so differently across the lots.

Save the Children Denmark has the following suggestions for changes to the text, in line with the points made above:

Page/para	Suggested changes (in red)	Justification for suggestion
Page 3	<p>4th bullet:</p> <ul style="list-style-type: none"> ○ “Efforts that enable partners in conflict and crisis affected communities, including communities hosting displaced people, to respond to both immediate and long-term consequences of crises”. <p>Proposed additional bullets:</p> <ul style="list-style-type: none"> ○ “Efforts that enable partners in conflict or disaster affected communities to strengthen resilience and self-reliance of vulnerable people and communities and to build capacity within early warning, risk reduction, preparedness and resilience in their communities”; ○ “Efforts to ensure coherence with humanitarian work aimed at reducing vulnerabilities of communities and people affected by crisis in a sustainable manner by building self-reliance, resilience, preparedness and through supporting durable solutions for displaced people;” 	Adding these activities would strengthen the incentives for organisations working under Lot CIV to respond to the nexus and contribute to more sustainable impact.
Page 3	<i>In the description of Lot CIV objectives and activities, use definitions and language from the Civil Society Policy:</i>	Adding this language to Lot CIV on p. 3 would incentivise a more holistic and contextually differentiated approach to partnerships towards

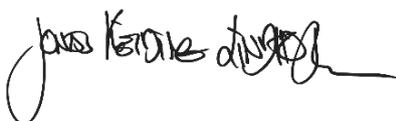
Page/para	Suggested changes (in red)	Justification for suggestion
	<p>P. 27 (of the Civil Society Policy): “Civil society is often weak, fragmented and less well defined in fragile environments.”</p> <p>P. 28: “A particular relevant area, apart from technical capacity, is to develop skills and approaches for government institutions to engage with civil society in participatory and inclusive planning processes. Such engagements should however only be undertaken in full respect of the humanitarian principles.”</p> <p><i>Add language from Information Note Annex 2 p. 8:</i> “For engagements in areas affected by armed conflict: [] contribute to capacity building of communities, national and local organisations, local authorities and/or other relevant actors, thereby improving their ability to better prepare for and respond to crises, in particular in favour of vulnerable, poor and marginalised groups.”</p>	<p>strengthening the space for and role of the civil society.</p>
Page 3	<p>6th bullet:</p> <ul style="list-style-type: none"> ○ “Strategic service delivery designed to reinforce advocacy, legitimacy of partners in the global South, innovation, learning, and capacity development of change agents and partner organisations. No stand-alone service delivery will be considered outside of humanitarian contexts.” 	<p>This bullet should be revised to be in line with what’s in the Civil Society Policy, p. 8: “<i>Limited strategic service delivery, capacity development and advocacy combined may reinforce each other, but stand-alone service delivery should not be considered outside a humanitarian context.</i>”, i.e. not outside <i>the entire Lot</i>, which is what the Lot description states. It is difficult to work with partners in humanitarian contexts without some measure of service delivery. Would like to also refer to the Civil Society Policy p. 27: “In fragile contexts, service delivery, such as health care or water, may be an important tool in not only addressing immediate needs but also in creating important <i>invited space</i> to begin working with much more sensitive issues – such as protection of vulnerable groups and advocacy for human rights.”</p>
Page 3	<p>6th bullet:</p> <ul style="list-style-type: none"> ○ “Strategic service delivery, i.e. ____ [...]” 	<p>We need a more clear definition of “strategic service delivery”, incl. what would <i>not</i> constitute strategic service delivery. There is no such definition in the Civil Society Policy either.</p>
Page 4, following the bullets	<p>”Like the current HPAs, all strategic partnership agreements under lot HUM will include flexible funds to enable the strategic partners to react swiftly and in a flexible manner to an immediate</p>	<p>SCD would welcome greater assurance of a larger amount of flex funds, e.g. that it could amount to up to 30%. Of SCD’s current HPA allocation, 27% are flex funds. It’s a</p>

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	humanitarian crisis, both through the deployment of personnel and through economic and material contributions. Flexible funds can amount to up to 30% of allocations under lot HUM.	critical instrument that enables us to respond rapidly to acute emergencies and support preparedness in slow onset crises.
Page 6, third para	“All Danish funded interventions in fragile states and regions should be guided by the principles of humanity, neutrality, impartiality and independence. Applicants applying for funding under lot CIV and LAB for strategic partnership engagements in such areas must be able to demonstrate and be assessed on a proven track record in operating in these contexts and be externally verified, certified, or in the process of either, against the Core Humanitarian Standard (CHS). ”	We would welcome more clear language in terms of organizations’ abilities to work in fragile countries characterized by highly politicized conflicts and challenged humanitarian space and how this will be assessed under the Lots.
Page 13, second para	“Applicants for lot HUM should demonstrate a 100 per cent geographic match between the proposed partnership engagement and the protracted crisis situations prioritized by Denmark (category 5). However, given the emphasis on migration and displacement within this Lot, interventions in countries neighbouring category 5 countries will be allowed without it negatively affecting the assessment. ”	The requirement under Lot HUM of a 100% match with the category 5 countries (p. 12) does not support regional responses to consequences of migration and displacement streams and the acknowledgement of the need to strengthen the “protection, resilience and self-reliance of vulnerable people <i>in and around</i> conflict- and crisis affected countries”. SCD would welcome more flexibility with respect to the country match requirement under Lot HUM. Such a change to the language, as proposed, should also be reflected in assessment criteria etc. We would also urge the MFA to consider <i>rewarding</i> organisations for taking such regional approaches; it would make sense, given the migration and displacement focus.

We are of course happy to elaborate on any of the points and suggestions made above.

Thank you again for the opportunity to comment on the draft Information Note.

With best regards,



Jonas Keiding Lindholm, CEO