

Principles of Rationalization in the Rohingya Refugee Response in Bangladesh

A. Background

1. Rationalization aims to ensure that all Rohingya refugees in Bangladesh have equitable access to all basic services in a predictable, efficient, and timely manner, and that the humanitarian community is more transparent and accountable.
2. Rationalization is in line with discussions on a ‘one camp approach,’ aiming to ensure that common strategies, systems, protocols, and tools are used across all the camps, regardless of the Areas of Responsibility (AoRs) of various agencies. This should lead toward a standardized and cost-effective approach to providing equitable services to refugees that reach, at the very least, a minimum standard of service delivery by different partners across all AoRs.¹ This is best achieved through joint coordinated approaches between AoR agencies, Sector/WG Coordinators, and other key stakeholders.²
3. Over the past years, significant measures have been taken to ensure the rationalization of some services (e.g.: within the Nutrition Sector). Yet, in 2021, 134 members that were part of the funding appeal document (i.e.: the Joint Response Plan (JRP)) worked across 11 Sectors in 34 camps. Up to 42 operational partners were present in some camps, while in other camps, the number was as low as ten. The average number of operational partners per camp was 30, with an average of five conducting activities in each camp in any single Sector. The Government has expressed concern over these dynamics and instances of significant overlaps, gaps, and different approaches, especially during crisis responses (e.g.: floods).
4. The number and geographic distribution of partners is a primary cause for significant overlap of services in some camps, and critical gaps in services in other camps. Sectors have redoubled efforts to rectify some of these issues in preparing the 2022 JRP. Yet more work toward a systematic and harmonized approach will be needed in the coming years to ensure that no one is left behind.

¹ There are other areas where efficiencies can be sought including maximizing programmatic gains through the efficient and high quality back-office operations. While this paper does not intend to address this matter directly, it recognizes the value of these initiatives in Bangladesh. Funding and implementing partners will continue to seek efficiencies through various mechanism. Many of the principles outlined in this document, similarly, seek to gain cost efficiencies (e.g.: principles 3, 4, and 5)

² An example of a common *strategy* would be to ensure that the whole operation agrees on a common position across all agencies and AoRs. An instance of a common *system* may relate to ensuring that all GBV cases are managed using the same referral pathway systems regardless of the AOR of the survivor's residence, the alleged perpetrator's residence or where the act takes place. An instance of a common *protocol* would be international data protection protocols, or protocols followed by all nutrition centres in dealing with severe acute malnutrition, regardless of who runs the centre. An example of a common *tool* could be a data collection system used in the aftermath of a fire.

5. To address these challenges, the Government, UN, NGOs and donor community need to work together with the relevant Sectors and Working Groups to avoid gaps and overlaps in partner presence and services provided. It is also critical that any given implementing partner provides the relevant standard package of services to all refugees within its remit as agreed by the relevant Sector.³
6. This document outlines the principles to ensure that rationalization takes place in a systematic, accountable, and transparent manner. It has been developed in collaboration with the donor community, international and Bangladeshi organizations, and the UN agencies that are engaged in the Rohingya refugee response in Bangladesh, and in consultation with the Sector/Working Group Coordinators. It also draws from good practices that have been followed by some agencies and Sectors these past years.
7. For the purposes of this document:
 - a. an **implementing partner** refers to an NGO that is seeking to raise funds from a UN agency or a donor government to implement projects directly or through other NGOs. In the latter case, this document will apply to both the NGO seeking funds and the NGO implementing the project. It also refers to a UN agency that is raising or receiving funds from a donor government to implement directly, through NGOs, or the Government of Bangladesh.
 - b. a **funding partner** refers to a donor government or an IFI providing funds to the UN or to an NGO for programmes or projects. It also refers to UN agencies funding NGOs to undertake activities in the camps. The document recognizes that funding partners must follow their own internal procedures in selecting implementing partners. This document does not aim to override these existing procedures but encourages all JRP partners to utilize these principles to benefit refugees and Bangladeshi communities in Cox's Bazar.
8. While this document focuses on the relationship between implementing and funding partners, it aims to strengthen the relationship between the humanitarian community and the Government primarily by ensuring transparency of data on the presence of implementing partners and ensuring a set of principles are followed in partner selection and partner

³ A standard package refers to a set of activities to be undertaken by a single implementing partner at the minimum to ensure that all refugees across all camps receive an effective service or assistance. For instance, a single implementing partner may be required to distribute LPG and help repair cooking stoves, as opposed to having two separate implementing partners provide these two different activities. It may also be important for a single implementing partner to follow a series of steps as part of a standardized referral pathway for SGBV survivors, or support to persons with disabilities, or building and maintaining WASH facilities as opposed to having different partners follow different aspects of the activity in different AORs. These standard packages can be reviewed periodically to ensure that they are still relevant to the operation, but also to determine how some of them can be merged across Sectors and agencies.

Where relevant, standard packages should consider cross cutting issues such as Communicating with Communities/Accountability to Affected Communities, PSEA, Age, Gender and Diversity mainstreaming (including protection of persons with specific needs such as the disabled) and environmental protection.

presence. Additionally, while this document focuses on the camps, it can by extension, guide activities outside the camps that support Bangladeshi host communities.

B. Operating Principles

Principle 1. Consult with Sectors/Working Groups before engaging in an activity

9. In advance of funding an activity, the relevant Sector(s)/Working Group(s), should be consulted:

- a. by the implementing partner to advise if the activity is in line with the JRP and current Sectoral/Working Group objectives and strategy;⁴
- b. by the implementing partner to advise if the activity complies with the minimum technical standards and/or contributes to a standard package if these standards have been agreed upon at the Sectoral level;
- c. by the implementing partner to ensure that geographic overlaps and gaps are avoided.
- d. by the funding partner to advise, if necessary, whether the implementing partner is known to have the technical capacity, meets the various standards and offers the quality of services established by the sector, and the experience to undertake the activity under consideration; and
- e. by an implementing or a funding partner to seek any other relevant data that can benefit the partnership agreement.

10. Implementing partners may wish to reflect that these consultations have taken place in the appealing/project document to reassure the donor partner. Where funding partners provide flexible funding (reducing direct involvement with proposal development and approvals), they should consider recipient agencies' efforts to apply these principles in downstream planning processes and continue to monitor how this is aligned with Sector strategies and leadership.

Principle 2. Ensure that implementing partners meet basic requirements

11. Implementing partners should, at least, meet the following requirements:⁵

- a. part of the JRP for that year;

⁴ Each sector and working group reviews, and if needed, updates their sector ToRs and strategies annually. They also develop annual workplans.

⁵ The list of basic requirements may be amended in future iterations of this document to comply with emerging or new safeguarding, technical, coordination or implementation criteria to assess eligibility of implementing partners.

- b. in possession of, or are eligible and/or able to obtain the relevant approvals by the Government in a timely manner;
 - c. members and active participants of the relevant Sector and/or Working Group. They should comply with the technical standards and policies set by the relevant Sector (that may include global standards followed by the Sector and/or specific guidelines or standards developed or used by the Sector in line with the humanitarian/refugee context, target audience, inclusiveness needs and/or adjusted to the operational environment); and
 - d. active members of the Cox's Bazar PSEA Network and have appointed PSEA Focal Points and Child Safeguarding Focal Points.
12. The above can be reflected in the project proposal documents shared by the implementing partner to the funding partner. Funding agencies can contact the relevant Sector and/or the ISCG for verification or clarification.
13. Exceptions to paragraph 11a include:
- a. the various Ministries and Departments of the Government of Bangladesh, members of the Red Cross/Red Crescent family, MSF and other organizations that do not seek funds through the JRP but work in close coordination with the Government and the ISCG.
 - b. Smaller or new national NGOs that are being supported and mentored to build their implementation capacity during the year so that they can participate in the JRP in the following year.

Principle 3. Adopt an integrated approach

14. An integrated approach aims to improve (a) inter-sectoral camp-based coordination, (b) service delivery to refugees and host communities, and (c) relations with the Government (in particular, with CiCs). This approach encourages funding agencies to ensure:
- a. *one implementing partner per Sector per camp, where possible*. Multiple implementing partners working in the same block undertaking the same activities must be avoided;
 - b. *implementing partners consolidate their services to geographically contiguous areas*. (i.e.: Currently, some partners are providing services in various blocks and camps that are distant from each other, thereby increasing overhead costs);
 - c. *implementing partners operating across multiple Sectors undertake these multi-sectoral activities in the same camp* (e.g.: if an NGO has the capacity to provide education, child protection, and health care services, they should be encouraged to provide these services in the same camp to allow an integrated approach between these Sectors); and

d. implementing partners participate in camp-level coordination platforms.

15. Exceptions to this approach may be made when:

- a. the portfolio of Sector activities is specialized or too complex (e.g.: where specific technical expertise is needed), or the population and geographic size of a camp is too large for one implementing partner to operate per Sector per camp. In this case, Sectors should advise on the maximum number of implementing partners that should operate in the camp⁶; and
- b. smaller Bangladeshi implementing partners are building their capacity in delivering services to refugees (e.g.: women-led organizations or community-based organizations). In such cases, these implementing partners may operate in a specified part of the camp or work closely with a larger implementing partner that is assisting with building their capacity in delivering the specified activity.

Principle 4. Ensure predictability and continuity

16. Predictability and continuity (1) ensure stability in the refugee operation, and (2) improve relations with refugees, the Government and other partners in the camps. Consequently:

- a. while recognizing that until 2022 JRP has been following an annual cycle, funding agencies should consider multi-year funding, especially for critical activities that may require sustained longer-term engagement (e.g.: LPG, food, education, health care, protection) or where upstream agencies (i.e.: UN agencies or NGOs funding other NGOs) are themselves receiving multi-year funds; and
- b. implementing partners should be encouraged to serve in the same Sector in the same camps for multiple years, recognizing that it takes time to build relations with the government agencies, the refugees, and other implementing partners in the camp.

17. Exceptions to this approach may be made when:

- a. implementing partners need to move to other locations or revise their activities to ensure that gaps and overlaps are avoided, not least through the rationalization process;

⁶ Sectors should ensure that through their implementing partners they ensure accessibility, availability, quality and timely lifesaving services, when applicable; as well as appropriate services for those living with disabilities or affected by mobility (i.e. older population or pregnant women).

- b. Bangladeshi implementing partners that build their capacity over time to undertake a specific activity in line with international standards or cover more geographic areas. In such cases, they may be given preference in line with the Grand Bargain;⁷ and
 - c. where an implementing partner is unable or unwilling to undertake activities, including due to non-compliance with PSEA standards.
18. When partners are requested to move their operations, or are phasing out of Sector/geographic area, the handover of relevant facilities, case files, and other elements to new partners must be done in a responsible manner, that also respects data protection protocols, during a reasonable transition period.

Principle 5. Ensure the right partners respond in cases of emergencies

19. In the event of an emergency, implementing partners that are already working in the affected camp(s) must be prioritized to provide services to refugees. This ensures greater coherence with the Government and better continuity of services to affected refugees.
20. Implementing partners from outside the affected camps may be called in to assist for a short period when the response is too large and/or complex for the existing partner(s) to single-handedly provide assistance. These implementing partners that are requested to support temporarily should demobilize and hand over activities and the relevant files that respects data protection protocols (i.e. for GBV case management) to the responsible partner in the camp once the emergency response is over.
21. This determination will be made by the relevant Sectors and Working Groups in consultation with the AoR lead agency in determining the gaps that need to be covered in such emergencies. Funding in cases of emergencies should be supported through Joint Flash Appeals when they are issued.⁸

Principle 6. Ensure transparency of information

22. All partners should share information on their activities in a timely and regular basis with the relevant Sector(s)/Working Group(s) and the ISCG that includes, at the very least:
- a. the funding agency(ies);
 - b. the implementing partner(s);
 - c. the specific activity undertaken;
 - d. the geographic location of the activity (including block level information for activities in the camps);
 - e. the period and duration of the funded activity; and
 - f. funding received and existing gaps.

⁷ Grand Bargain - <https://interagencystandingcommittee.org/grand-bargain>

⁸ Details in relation to emergency preparedness and response are reflected in the multi-hazard response plan and other inter-sectoral/inter-agency documents developed for the refugee response in Bangladesh.

23. The ISCG and the Sectors/Working Groups will develop an inter-sectoral database to map activities that are being undertaken in the camps at the block level on a quarterly basis. This database will be updated by the Sectors with the support of all funding and implementing agencies to ensure that accurate and real-time information is available. This should be accessible to all relevant partners to help make funding decisions and provide the information necessary to rectify any gaps and overlaps. This information should also be made available to the Government.
24. If for any reason, there are substantive changes to the initial partnership agreement that would impact the presence and activity of a partner (e.g.: extension of activities, early disengagement, change of activities), the implementing and/or the funding partner must keep the Sector/Working Group and/or the ISCG informed before implementing this change.

C. Implementation, Oversight and Review

25. Rationalization is the collective responsibility of all implementing and funding partners as well as the coordination structures involved in the Rohingya refugee response.
26. Implementing partners will:
 - a. seek advice and guidance from the respective Sectors/WGs and the ISCG as necessary in accordance with the Principles of Rationalization, both when applying for funding, as well as during the implementation phase;
 - b. update the relevant Sector/WG and/or the ISCG where relevant, on partnership arrangements and other information that will assist Sectors in identifying gaps and avoiding overlaps;
 - c. participate in the JRP drafting process where, *inter alia*, they demonstrate how the principles of rationalization are being incorporated into their efforts; and
 - d. participate actively in Sector/WG meetings and contribute towards the implementation of the rationalization principles.
27. Funding partners will:
 - a. ensure that activities that they are funding are in line with the principles of rationalization. Towards this, funding partners should seek advice and guidance from the Sectors/WGs and the ISCG as necessary in accordance with the Principles of Rationalization, sector strategies, mapping and annual workplans; and
 - b. update the relevant Sector/Working Group and/or the ISCG where relevant, on partnership arrangements and other information that will assist Sectors in identifying gaps and avoiding overlaps.

28. Sectors/Working Groups will:

- a. sensitize their members on these Principles of Rationalization and integrate them into their sectoral strategies;
- b. update their 2022 Sector strategies to reflect how these Principles of Rationalization will be implemented;
- c. ensure that the peer review process and the JRP submissions integrate these Principles of Rationalization, beginning with the 2023 JRP; and
- d. track gaps and overlaps in activities and funding within their Sector, update the inter-sectoral database, as well as provide accurate and timely information to partners as and where needed.
- e. Collect information on the quality of services provided by implementing partners with a view to ensure that minimum standards are always maintained in the operation in line with sector guidelines, and to provide advice to funding agencies.

29. The ISCG will:

- a. work with Sectors/WGs during the JRP preparations to ensure that the peer review process, partner selection process, and the JRP draft reflect these principles;
- b. consolidate information from various partners and Sectors/WGs to complete the inter-sectoral database, and update the database at all times;
- c. provide guidance to Sectors/WGs and partners as and when needed; and
- d. work closely with the Government to ensure the implementation of these principles.

30. Recognizing that the rationalization exercise is a complex process, the Rationalization Team⁹ will support the UN, donors, NGOs, and Sectors/Working groups. The main functions of the team will be to:

⁹ As of March 2022, the Rationalization Team consists of the following representatives:
Donor Community: Daniela D'urso (ECHO Dhaka) and Emily Macdonald (Australian High Commission).
NGO Community: Maheen Chowdhury (Save the Children) and Hasina Akhter (BRAC).
UN Agencies: Roselidah Raphael (UNFPA) and Ezatullah Majeed (UNICEF).
The Rationalization Team is supported by the ISCG.

In the event of any changes, the donor group in Dhaka will nominate any new donor representation; the NGO platform will nominate individuals from the NGO community; the UN Heads of Agencies in Cox's Bazar will nominate individuals from the UN community. Nominations will be considered and approved by the existing Rationalization Team members, and the SEG Co-chairs will be informed of these changes.

- a. Revise and refine this document based on feedback from all relevant stakeholders for endorsement by the SEG.¹⁰
- b. Provide specific or general clarification and guidance to Sectors, donors, UN agencies and NGOs as and when needed.
- c. Support the ISCG in overseeing the 2022 updated Sector/WG strategies to determine how rationalization is integrated into their efforts. Additionally, support the ISCG in the JRP preparations to ensure that the peer review process, partner selection process, and the JRP draft reflect these principles.
- d. Receive and address grievances and concern from partners in situations where rationalization principles may not be adhered to.
- e. Brief the SEG on progress made in relation to the rationalization of the operation on a regular basis.

This document has been endorsed by the Strategic Executive Group (SEG). It applies to all funding, implementing and coordinating partners engaged in the Rohingya refugee response in Bangladesh.

END

¹⁰ Issues such as transparency on costs including the ability to compare the costs of service delivery between agencies, as well as transparency on the quality of delivery are some issues that can be considered in future revisions.

This document should be reviewed at least once a year, preferably before the development of the funding appeal document (i.e.: JRP).