

# COHERE



## RESEARCH REPORT

Addressing five barriers to implementing “Meaningful Refugee Participation” in the refugee response.

Identifying practical solutions to the challenges of refugees’ meaningful participation in humanitarian decision-making that affects them.

December 2022

## Preface

Two years after the 2019 Global Refugee Forum (GRF) and the pledges that were made by actors of the refugee response at that forum, the idea emerged of documenting and discussing solutions to challenges faced by pledge-makers targeting meaningful refugee participation. In response to United Nations High Commissioner for Refugees (UNHCR)'s encouragement to reflect on best practices, and from internal reflection, an international staff member working at the time for Urban Refugees, and later for Cohere, proposed to additionally identify barriers commonly held by pledge-makers to implementing their pledges, and to gather solutions to overcome them.

Despite progressively working towards meaningful refugee participation, Cohere acknowledges that participation is processual and progress may be uneven. Although refugee leaders as Non-Governmental Organization (NGO) staff and Refugee-Led Organizations (RLOs) were consulted at various stages of this research, persons with lived experience of forced displacement did not participate in the design of the research agenda. Seven refugee leaders affiliated with RLOs and NGOs were involved as respondents to a list of questions set without them. They were also invited to give feedback on this report. In future research, Cohere aims to learn how we can expand meaningful refugee participation at all research stages as we seek to consistently hold ourselves to the high standards that we advocate. Cohere believes meaningful participation is not only the ethical course of action, but also produces more effective outcomes, held as legitimate to those we serve.

The lack of participation at the initial stages can be explained by several reasons, including that the researcher was already working on implementing Cohere's pledge for refugee participation. Additionally, they were already aware of some of the challenges faced by its own organization and its broader NGO network. They had an understanding of the structures of pledge-making NGOs, and held an overview of the specific tools and strategies NGOs use to reach meaningful refugee participation.

Cohere recognizes that its lack of refugee participation in research design did not align with the Global Refugee-led Network (GRN)'s definition of meaningful participation as it is defined in section 1.1 of its seminal publication on this topic. We admit that Cohere's shortcomings to recruit RLO partners and researcher(s) with experience of forced displacement potentially limited the research's outputs. With a fuller understanding of GRN's participation definition, we now commit to address these shortcomings in future projects to maximize the reach and utility of our research to benefit displaced communities.

If Cohere had applied the research findings at the time of designing this report, we could have established a process of co-ideation of the paper with relevant refugee-led research partners or hired researchers with a refugee background. We could have embraced the possibility that our research idea would be modified or even replaced by participating RLOs or individuals.

This co-generation of ideas may have guaranteed that the energy and funding invested in research more directly meets the most pressing needs that refugees themselves identified and prioritized. With our support, expert RLOs or researchers could have played a critical role in all stages of the research (developing protocol, data collection, compilation, analysis and interpretation of results, report drafting, publication and dissemination plan) and could have had ownership of the research results, which is not fully the case at

present.

Cohere is not exempt from the need to apply the report's recommendations. In consideration of our limitations and potential missteps during the initial research design phase, this report adheres to the principles of step 5 (refugee leaders are consulted and informed) on the eight steps of refugee participation adapted from Harts' "Ladder of Participation". Despite the original focus on parents and children, Harts' original sociological tool has been adapted in recent research on refugee's meaningful participation by the GRN, the European Coalition of Migrants and Refugees (EU-COMAR), New Women Connectors (NWC) and Oxfam to "assess to what degree refugees are involved in decision-making processes that affect their lives"<sup>1</sup>. We refer to this adapted model to reaffirm and demonstrate practical ways to increasingly achieve refugees' meaningful participation in humanitarian decision-making.

Cohere is motivated and committed to continuously transform its model to go beyond consultation and achieve meaningful participation at all levels and stages of decision-making, as aligns with the GRN's call. Indeed, Cohere is one year into a five year strategy to reform as an NGO and share power with the stakeholders who are most affected by the organization's work, especially refugees.

We hope our honest, internal reflections will inspire other stakeholders to similarly engage in reflection. We hope this report provides an analytical framework and implementable toolset for others in our emerging community of practice to expand meaningful refugee participation in all areas as they are able.

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Cohere's vision is to share power with refugee communities by strengthening and sharing capacity with refugee leaders and with their host community leaders, channeling funding to refugee-led initiatives, supporting initiatives to network and coordinate local leadership structures, and advocating for a transformation of global responses to forced displacement.

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## Background

In the paper “Beyond consultation. Unpacking the most essential components of meaningful participation by refugee leaders” (2021), the GRN, EU-COMAR, NWC and Oxfam recommend that “organizations working in the field of forced displacement need to engage in some deep soul-searching to ensure diversity in their staffing and programming that guarantees the meaningful inclusion of forcibly displaced persons (in terms of age, gender and diversity). There is also a critical need to provide refugees with technical and capacity-building support (in a non-patronizing way) to help them take charge of matters that have a bearing on their lives.”

The Local Engagement Refugee Research Network (LERRN) Paper n°7, “To be a refugee, it’s like to be without your arms, legs’: A narrative Inquiry into Refugee Participation in Kakuma Refugee Camp and Nairobi, Kenya” (Duale, 2020), recommends in section 5.2 the establishment of “a community of practice to build capacity for refugee participation within UNHCR and NGOs”.

In the lead-up to the 2019 GRF, UNHCR launched an initiative for “States, organizations, businesses, academics and refugees themselves” to formulate pledges that “advance the objectives of the Global Compact on Refugees”<sup>1</sup>. A variety of stakeholders formulated ambitious meaningful participation pledges to include refugees in decisions and programs that affect them. Based on interview results of how fifteen pledge-maker NGOs & RLOs identified and analyzed challenges to implementing their pledges, and on two expert RLOs’ understanding of these challenges, this paper scrutinizes and deconstructs some of the effectiveness gaps to achieve refugees’ meaningful participation in humanitarian practice in 2022. Our aim is to help refugee governance stakeholders, particularly RLOs and NGOs, to rethink and propose solutions to these challenges. For each identified barrier, we highlight actionable steps that respondents suggest to pragmatically advance and achieve meaningful participation.

This paper shows how three years after pledging for meaningful participation, even NGOs dedicated to supporting refugee leadership can struggle to overcome key internal and external challenges. In practice, rather than transforming how decision-making for refugee governance is enacted, many humanitarian stakeholders may unintentionally continue to reproduce systemic inequalities that exclude refugees from contributing towards vital decisions that impact them.

Due to limitations in the number of interviewees and narrow scope of the research project, this paper does not claim to be representative of all actors within the global refugee response. Through examining barriers commonly cited by the respondents interviewed, this paper contributes to lay the foundations for a common, incremental trajectory for organizations to advance meaningful refugee participation in their everyday practice.

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## List of abbreviations

**AA** - Asylum Access

**AAP** - Accountability to Affected People

**AGD** - Age, Gender and Diversity

**CBO** - Community-Based Organization

**GCR** - Global Compact on Refugees

**CLS** - Center for Lebanese Studies

**CRRF** - Comprehensive Refugee Response Framework

**DEI** - Diversity, Equity and Inclusion

**EU-COMAR** - European Coalition of Migrants and Refugees

**GRN** - Global Refugee Network

**GRF** - Global Refugee Forum

**HPG** - Humanitarian Policy Group

**IOM** - International Organization for Migration

**INGO** - International Non Governmental Organization

**KRA** - Kenya Revenue Authority

**LERRN** - Local Engagement Refugee Research Network

**NGO** - Non Governmental Organization

**NWC** - New Women Connectors

**RLO** - Refugee-Led Organization

**RLRH** - Refugee-Led Research Hub

**RRLI** - Resourcing Refugee Leader Initiative

**R-SEAT** - Refugees Seeking Equal Access at the Table

**RSC** - Refugees Studies Center

**UNHCR** - United Nations High Commissioner for Refugees

**WHS** - World Humanitarian Summit

**YVC** - Youth Voices Community

## About the paper

This paper aims to support humanitarian agencies, NGOs, RLOs, and other refugee governance stakeholders to overcome some of the challenges they may encounter to effectively achieve meaningful refugee participation. It presents original findings from interviews administered by Cohere with fifteen NGOs and RLOs who made pledges for meaningful participation in the lead-up to the 2019 Global Refugee Forum (GRF). It highlights the five most common barriers they identified to fully implementing their participation commitments.

This paper is grounded in a conviction that refugees' meaningful participation at all levels of response is not only ethically desirable, but also that it can yield substantial benefits for refugee governance actors and stakeholders working in the field of forced displacement.

Our analysis holds important lessons from recent research and evolution in organizational practices, showing that meaningful refugee participation is a strategic resource in pursuing various organizational interests: that it leads to more effective and efficient responses, helps unlock new and additional forms of funding, facilitates new solutions to long-lasting challenges, and enhances legitimacy and reputation of the actors involved. In this field of research, we particularly acknowledge the academic work done by the Local Engagement Refugee Research Network (LERRN), the Oxford Refugee Studies Centre (RSC), the Refugee Led Research Hub (RLRH) and the Center for Lebanese Studies (CLS)<sup>3</sup>. They provide strong empirical evidence on the impact that RLOs have in their respective regions<sup>4</sup>, and extrapolate the substantive value of meaningful partnerships with RLOs for humanitarian organizations more broadly. Through a case study of Asylum Access' current internal transformation<sup>5</sup> and of the Resourcing Refugee Leadership Initiative (RRLI)<sup>6</sup>, we also highlight the positive impact of evolutions in organizational practice on their external efforts<sup>7</sup> towards and with refugee leadership.

Our analysis builds from and contributes towards three primary strands in the growing literature on meaningful participation: the work of and with RLOs, the impact of diversity and inclusion on organizations' capacity, and the localization discussions.

First, we highlight systematic areas where refugee & RLO inclusion in decision-making is a priority, such that their participation can consequently improve the quality of humanitarian assistance<sup>8</sup>. RLOs' capacities in humanitarian response were particularly recognized as essential during the COVID-19 outbreak<sup>9</sup>. In contrast to international actors, RLOs held better knowledge of their contexts and communities, remained present in affected areas, had better access and were able to operate efficiently and more cost-effectively than other service providers. At the height of the COVID-19 pandemic, the Refugees Lead campaign<sup>10</sup>, hosted by NeedsList and involving more than ten campaign partners, was initiated to create awareness on the diversity of RLO profiles, their role as essential responders, and to compensate for the chronic underfunding that they faced, and indeed are still facing. As said by Fionna Smyth, Head of Humanitarian Campaigns and Advocacy at Oxfam International in 2020, "Local, refugee-led groups have proven time and time again that they are able to respond to urgent needs of their communities. Now more than ever this has become evident. The humanitarian response system needs to adapt and directly support grassroots organizations doing frontline work"<sup>11</sup>. Based on the principle that RLO inclusion leads to a better response, this paper proposes actionable solutions to some of the obstacles to RLO participation cited by interview respondents.

Secondly, we contribute to the growing literature on how diversity and inclusion of refugees in decision-making processes can strengthen organizations' internal capacity and external impact. Adhering to this principle, several States, including Canada, the United States, and Germany have taken the extraordinary steps to endorse refugee participation by appointing a refugee member in their future delegations to UNHCR meetings<sup>12</sup>. Furthermore, humanitarian organizations and UNHCR have argued that workforce diversity enhances their ability to execute their mandates. Per UNHCR, "diversity and inclusion, particularly in an organization such as UNHCR, are a vital asset to the international civil servant's professional arsenal"<sup>13</sup>.

Finally, this paper contributes to the scholarship on localization. Considered as an essential step in the consultations leading up to the 2016 World Humanitarian Summit (WHS), the localization agenda follows the principle that humanitarian action should be "as local as possible, as international as necessary"<sup>14</sup>. It represents efforts within the growing movement to increase leadership of local actors as indicated in global commitments by donors and NGOs. For example, signatories to the Charter for Change and the Grand Bargain committed to targeting 25% of their funding to local organizations. The goal of strengthening local humanitarian leadership has also been embedded into the global policy framework on refugee response, such as the 2016 Comprehensive Refugee Response Framework (CRRF) and the 2018 Global Compact on Refugees (GCR). The GCR states that responses "are most effective when they actively and meaningfully engage those they are intended to protect and assist". A vast amount of scholarship has been done on the importance of sharing power and resources with local and national actors, and on the form which decision-making in humanitarian responses should take<sup>15</sup>. This paper adds to this vital literature.

In all, this paper aims to improve the practice of meaningful refugee participation by humanitarian organizations by presenting steps to overcome five identified barriers to the achievement of organizations' participation goals.





## Positionality

Cohere is neither an external nor impartial observer to the topics discussed in this paper. Cohere was formed from the 2022 merger of two NGOs - Xavier Project and Urban Refugees. These organizations joined forces as they both work in the same region and held a shared mission to advance refugee-led responses through similar programs (capacity-sharing, funding, advocacy and coordination)<sup>16</sup>. Before transforming into Cohere, Xavier Project and Urban Refugees each committed individual pledges for meaningful participation prior to the 2019 GRF.

Second, the primary author of this paper is a researcher for Cohere, but is also an insider of the emerging community of practice interviewed. The researcher was already documenting Cohere's internal discussions on challenges it and other organizations face. We were inspired by the reflections of other refugee response researchers on the concept of "positionality"<sup>17</sup>, recognizing that the identities and priorities of researchers condition their research because they are part of the social world they invest in<sup>18</sup>.

Cohere's 'insider' position as an engaged member of the community of practice introduces a potential source of bias to interpret interview findings. This risk of bias is generated, in part, as our past conversations in this community of practice produces additional information beyond the data available in the public domain and the data generated from our interviews. To minimize this potential bias, the researcher has taken care to acknowledge the distinction of data collected through formal respondent interviews and data generated through past, informal conversations. While there were often similarities between the viewpoints in the formal interviews and informal conversations, this paper privileges the former and strives to let the voices of the interviewed respondents stand on their own. Second, the researcher seeks to minimize bias by relying on secondary data through existing literature.

In addition, we ask the reader to understand that our analysis reflects only the perspectives of the seventeen interview respondents and is not representative of views held by the broader refugee response community. Nevertheless, we consider that these challenges and perspectives have the merit of being brought to the public domain, and hope that the solutions mentioned can inspire other pledge-makers and actors to engage in this conversation. Cohere would be happy if the findings and recommendations of this study would prompt broader research that would not be limited to the discussions around the 2019 GRF pledges on meaningful participation.

## Context

This study presents a narrative of the challenges seventeen stakeholders working in the field of forced displacement faced to proactively engage the topic of refugee meaningful participation. It represents the perspective of fifteen stakeholders who made GRF pledges for "meaningful refugee participation"<sup>19</sup>. Among the pledge-makers Cohere interviewed are eleven NGOs representatives (two of whom have lived experience of forced displacement), one State actor and three RLO delegates. Beyond pledge-makers, the researcher sought and obtained interviews with two additional RLO leaders who are actively engaged in and recognised for their advocacy.

The interview respondents cover fourteen countries across Central America, North America, East Africa, the Eastern Mediterranean, Europe, South East Asia, and Asia Pacific.

It is of the utmost importance to further develop research on the challenges to refugees' meaningful participation in the academic and policy field meaningful participation in the academic and policy fields. Nevertheless, as the majority of interview respondents come from within humanitarian and development NGOs, we highlight recommendations specific to these sectors.

Cohere believes in the importance of transparently addressing barriers to meaningful refugee participation. As a member of the global refugee response, we seek not to condemn past failures, but to start a powerful collective conversation to improve the quality of our services for people impacted by forced displacement. We think that, as allies of refugee leadership, we have the responsibility to work alongside refugees to leverage our privileges and opportunities to meaningfully and collaboratively address our sector's deficiencies. We believe that facing these gaps as a community is a necessary step to guarantee that participation mechanisms are deployed in the most meaningful way.

## Methodology

Out of the one thousand six hundred twenty-six pledges in the UNHCR's GRF pledge database<sup>20</sup>, fifty<sup>21</sup> included a dimension of meaningful refugee participation<sup>22</sup>. Using a sign-up form distributed by UNHCR, Cohere invited all fifty pledge-makers to participate in the research. Cohere also directly contacted twenty-six pledge-makers whose contact information could be obtained. Fifteen pledge-making entities responded and agreed to participate in the study.

Each entity selected respondents who hold a good understanding of the challenges their organizations faced in implementing their pledges. The respondents were mainly CEOs or country directors, program leads, and advocacy officers. Their responses illuminate distinctions in how the unique international, country or local organizational context influenced perceptions of perceived barriers and opportunities for expanded participation<sup>23</sup>. Upon conducting interviews, respondents were given the option to remain anonymous or to have their organization named. Ten chose to remain anonymous and five did not. Despite their willingness to be identified, and for consistency, Cohere has anonymized all responses throughout this report. The choice for anonymity honors the integrity of ideas arising from the interviews, regardless of the obligations related to bureaucracy or to the preservation of the public image of organizations. Organizations were only named as case studies when they gave permission to reveal themselves. Feedback beyond case studies remains anonymous.

The semi-structured interviews lasted, on average, for one hour<sup>24</sup>. Organizations were asked to share their definition and ambitions for meaningful refugee participation, the barriers they faced to implementing the various commitments within their meaningful participation pledges<sup>25</sup>, and the solutions they identified, implemented or advocated for to overcome these barriers. The data gathered has been analyzed using thematic analysis to identify patterns for barriers met, associated good practices developed by respondents and other solutions they suggested to overcome barriers.

Analysis revealed two distinct trends in how pledge-makers made commitments to advance refugee participation. We label the first category of pledges as commitments to advance "internal" refugee participation, which are directed towards enabling participation within the pledge-making entity. This category covers nineteen unique commitments including twelve commitments to increase refugee recruitment into the organizations (e.g., to increase the number of applications, internships, and to increase refugee inclusion within management and leadership teams), four to increase refugee inclusion goals on the organization's executive board, and three to include refugees in the

design and monitoring of programs and partnership policies, without a specific reference to recruitment.

We label the second category of pledges as commitments for “external” refugee participation, which are commitments directed towards enabling participation outside of the pledge-making entity, i.e. in the refugee sector in general. This category includes thirty-six distinct commitments including thirteen for RLO capacity-strengthening and one in capacity building of other actors for inclusion, ten in advocacy, communications and sharing of good practices, eight to support RLOs’ participation in decision-making spaces, and three to fund RLOs, among others.

Finally, six unspecified commitments under GRF pledges mentioned refugee participation, but do not provide details of what this participation meant or of named actions to achieve it.

This report is organized by the two categories of challenges to “internal” and “external” participation pledges.

Throughout this paper, we will refer to the adapted ladder of participation framework developed by GRN, Oxfam, EU-Comar & NWC, in reference to Hart’s sociological tool “Ladder of participation”<sup>26</sup>. The adapted framework allows one to pragmatically and theoretically envision degrees of refugees’ participation in decision-making processes that affect them. We refer to these steps to situate the degrees to which meaningful participation efforts of respondents are related.

## The eight steps of refugee participation, based on Hart’s Ladder of Participation

Original Source : GRN, EU-COMAR, NWC, Oxfam. (2022). Beyond Consultation, Unpacking the Most Essential Components of Meaningful Participation by Refugee Leaders, pp.7-8, figure 1.

**Step 8. Refugee-initiated, shared decision making with non-refugee policy makers**

**Step 7. Refugee-initiated and directed**

**Step 6. Non-refugee-initiated, shared decision making with refugee leaders**

**Step 5. Refugee leaders consulted and informed**

**Step 4. Assigned but not informed**

**Step 3. Tokenism**

**Step 2. Decoration**

**Step 1. Manipulation**

## Notes on terminology

Respondent NGOs are alternatively referred to as “respondent NGOs” or “peer NGOs” in this report. The label “Respondent NGO” captures challenges they themselves encountered to implementing a pledge, while the label “peer NGO” refers to interpretation made by one organization of a challenge faced by another. This dual labeling system represents a potential methodological challenge when we discuss legal barriers and solutions (section 4) as hosting States have distinct laws and policies and that organizations may have different risk tolerance or opportunities to implementing a recommendation.

The designation “NGO” also includes the testimony of one organization attached to a State actor, due to an insufficient number of State actors’ collected interviews to constitute a grouped analysis.

For the purpose of this paper, the terms “refugee” and “RLO” refer to a person or an organization led by people who have been forced to flee their country, regardless of obtaining any legal status<sup>27</sup>.

## Research questions and objectives

This paper seeks to inform the refugee response sector’s policies and practices in respect to refugees’ meaningful participation in decisions that affect them. Building on the position of some of the most proactive organizations and most vocal RLOs on the topic, the research asks further: Where do the differences lie between the definition, ambitions, and the enactment of meaningful participation by organizations in the refugee response sector? How do NGOs and RLOs differently identify **among the internal and external barriers to achieve participation?** What are the solutions that have been or can be implemented by NGOs and RLOs to overcome these challenges?

# Analysis of the main barriers

## 1. Gaps to conceptualize the “what” and “how” of meaningful participation

### 1.1 Defining meaningful participations

-> The “why” of meaningful participation.

All of the entities interviewed agreed that meaningful participation is important, but varied in describing why this is so. They understood participation as a right – a human right, a right to dignity, agency, and self-determination – and as a way to make their humanitarian interventions not only more “accepted” by refugee communities, but also more “efficient”, “impactful”, “legitimate”, “transparent”, and as a better means of effecting sustainable solutions “guaranteeing respect for refugees’ rights”. Three respondents described that emphasizing how refugee participation can produce measurable outputs, may attract the attention of policy makers, donor countries, institutions and INGOs, among other decision-makers, in turn expanding the willingness of these actors to increase meaningful participation across the sector.

-> Variations in conceptual appreciations of the “what” of meaningful participation.

Despite the widespread support for meaningful participation by respondents, the exact implications of the term were a matter of debate. Six respondents (four NGOs including three from the same family of organizations, and two RLOs) referred to the definition prepared by the GRN and adopted by a multi-stakeholder coalition in the context of the 2019 GRF.

#### The GRN definition<sup>28</sup>

“When refugees — regardless of location, legal recognition, gender, identity and demographics — are prepared for and participating in fora and processes where strategies are being developed and/or decisions are being made (including at local, national, regional, and global levels, and especially when they facilitate interactions with host states, donors, or other influential bodies), in a manner that is ethical, sustained, safe, and supported financially.”

When the GRN's definition was not directly cited, stakeholders' language about meaningful participation fell into three categories. The first centers on participation as occurring from consultation: "our ambition is for refugee voices to inform our decisions", "voices heard and taken into consideration". The second centers on partnership or co-design between refugees and NGOs: "run the organization together", "effective and continued participation", "it's not about letting them participate in solutions we define". The third category moves beyond co-design to refugee ownership: "refugees are in charge of all the steps", "refugees are controlling decisions and relevant resources", "make sure nobody decides for them". The respondents' ambitions are situated between step 5 (refugee leaders consulted and informed), step 6 (non-refugee-initiated, shared decision making with refugee leaders), step 7 (refugee-initiated and directed) and step 8 (refugee-initiated, shared decision making with non-refugee policy makers) on the eight steps of refugee participation. Thus, while nearly all respondents explicitly supported "meaningful participation" they did not fully agree on what it meant.

Three interviewees rejected the term itself, arguing that "meaningful participation" might be the wrong concept. An NGO respondent felt that the term had become part of a "tokenistic, box checking" exercise, and they decided instead to use "transformative leadership" to represent the goal of creating "an environment where people with lived experience of forced displacement lead decisions and processes" by shifting power internally and externally.

Another NGO respondent argued that meaningful participation of refugees should go beyond the bounds of international service delivery. Rather than thinking only about how to support refugees to participate in the immediate refugee response decision-making processes, the question "should be about meaningful participation in terms of (creating) a refugee-led response within the society as a whole". This respondent reported their push for transformation was shared by other NGOs in their country, who similarly advocate for expanded refugee leadership. For them, the humanitarian and development system should further enable ways in which refugees can contribute towards reducing marginalization, inequalities and racism and lead within society as a whole. "This would allow the stakeholders concerned to challenge their imagination about what their efforts for meaningful participation could graduate towards, about what it means to give people power and control, as opposed to the tokenistic, superficial stuff we are currently doing". Support to refugee leadership as a concept would then foster aspects of participation "locally in the development of the hosting community, through participation in local policy design, in the development of economic life" or "more globally, for example through national or international political participation, in parliaments or in regional political coordination bodies".

## 1.2 Effects of the different understandings of the “what” on the “how” of meaningful participation on respondents’ pledges

The different understandings of the concept of meaningful participation coupled with a lack of adoption of a common framework for implementation across organizations has led to a gap between support for the concept and its enactment.

The “internal” and “external” trends in how pledge-makers made commitments to advance refugee participation are not rigid, mutually exclusive categories (p.12). Nevertheless, within the NGO pledge-makers interviewed, seven organizations made both internal and external commitments while four organizations had only external pledges. This suggests that there is no consensus though a growing adherence to connecting internal and external participation efforts among respondents.

Respondent organizations having built their pledges on the nexus between internal and external commitments seem to interpret internal transformation as going “hand in hand with the creation of programs for refugee meaningful participation out of the structure” - as formulated by an NGO respondent. For this NGO, going through an internal Diversity, Equity and Inclusion (DEI) transformation process, is a “prerequisite to help any person with lived experience of forced displacement”. They define DEI as a set of training, unlearning, goals and metrics settings that create an inclusive environment, essential for the success of organizations’ meaningful participation goals. This transformation highly nourished the nature of their commitments for meaningful participation as they considered that “there are no equitable partnerships with RLOs without DEI”.

The majority of NGOs interviewed proposed to enact meaningful participation at the post-ideation stages of the decision-making processes for their programs, such as discussing decisions around program implementation with refugee staff or RLOs, and through the development of programs to support RLOs’ participation in the sector. Their enactment plans do less to ensure equitable, sustained refugee participation from the outset in setting agendas and planning budgets of such programs, such as including refugees in organizational management, leadership teams, boards of directors, or as equal partners with equal funding for RLOs, providing facilities, and logistical support.

This echoes an observation made by an RLO respondent on the still dominant NGO position in the refugee sector: “they can support our cute little RLOs but having us inside the room for big decisions, no”. For another RLO respondent, most NGOs in the refugee sector are closer to “meaningful consultation” than to “meaningful participation”, which corresponds to step 5 on the eight steps of refugee participation.

The “what” and “how” of meaningful participation in terms of priority actions means quite different things to a variety of actors across the refugee response, and a substantial portion of participation processes implemented do not guarantee that refugees can tangibly impact the organizations’ decisions. Organizations thinking mainly of participation as strengthening RLOs’ capacities to self-organize, without addressing how to ensure equal access to a diverse group of refugees in their own decision-making processes (such as setting priorities and budgets), may be disappointing or even disempowering for refugees. An emphasis on RLO self-organization can be exacerbated in areas of scarce resources and hostile government policies. Though it may seem to answer the Grand Bargain (by

reducing the demand for humanitarian aid through encouraging refugee self-reliance), this emphasis does not fully meet the localization agenda, which involves, as much as possible, to share decision-making powers and funding with local responders.

All five RLO respondents, in contrast, saw meaningful participation as a form of “co-ownership” which includes “adding seats to the decision-making table” of stakeholders working in the field of forced displacement, and “together defining goals, strategies and outcomes of programs from the very beginning”.

One RLO respondent suggested that insufficient engagement with refugees and their ideas can be linked to the lack of agreement defining meaningful participation, in terms of reasons and ultimate goals. For them, some in the sector consider meaningful refugee participation as a goal in itself (considered as seeking refugees’ input) rather than a **means** of creating “better systems, programming, implementation, response in every aspect”. For the respondent, the goal is not to have existing programs being “better accepted” or “to reach more beneficiaries”, but for refugees to identify gaps and “co-lead the design of new strategies for a better response”, thus by being involved “from the outset”.

For the Forced Migration scholar James Milner, meaningful refugee participation occurs when “refugees from different backgrounds have sustained, substantive contribution and influence in forums where decisions, policies and responses that affect them are being designed, implemented and measured, in a way that is accessible, broad, informed, safe, free, and has the potential to change the outcome”<sup>29</sup>.

As long as refugees do not have an equal voice in all steps of an organization’s decision-making, their participation is limited to only endorsing existing initiatives. One respondent noted how “refugee leaders argue that their exclusion limits the legitimacy of the design and potential of humanitarian efforts”.

When refugees are brought in only to give feedback on agendas they were not invited to set, they are unlikely to feel invested in the process or confident in the outcomes.

*“It hurts me to be asked for feedback on a program that possibly is not doing the right thing in comparison to what is needed” - RLO respondent.*

As an RLO respondent observed about the humanitarian intervention led by people without experience of forced displacement: “The staff making the strategies for improving the wellbeing of refugees doesn’t know about the root causes of the problems in the camp. How can you expect their strategies to be the most useful? We need people who formulate strategies to be refugees”.

From this view, even when included in an organization’s refugee advisory board or invited to a panel at conferences, the invited individuals may come to see this service simply as a source of income rather than an engagement with high chance of impact or change, “yet if they would be given the opportunity to be in the organizations’ leadership teams or to co-design programs with them through their RLOs, they wouldn’t ask for the token”.

When refugees are excluded at the design stage, high-profile and well-funded strategies remain largely managed by individuals without refugee backgrounds, reinforcing a long-standing perception that refugees are victims or passive aid recipients<sup>30</sup>. In his paper on refugee participation in Nairobi and Kakuma<sup>31</sup>, Mohamed Duale describes a paradox that although UNHCR and NGOs may hire refugees as workers in Kenya, they are often



“de-professionalized” (p. 24) or assumed to have minimal professional capabilities, and paid drastically lower wages than citizens, while simultaneously being assigned physically and emotionally difficult work.

While refugee leaders, RLOs, researchers with experience of forced displacement, and some organizations are vigilantly working to challenge this outdated view of disempowered refugees, more work can be done.

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## 1.3 Solutions

### Good practices

- “To consider a broad interpretation of ‘meaningful participation’ such as that proposed by the GRN, until such time when some consensus can be reached on the definition of the concept” and how to implement it.
- To strengthen the design of meaningful participation goals by committing to the values of DEI and by earmarking adequate resources to undergo DEI assessment and consequent trainings. This will allow organisation identify and remove barriers that perpetuates tokenistic practices and prevent the establishment of inclusive environments and equitable partnerships, such as individual and organizational bias and problematic systems and structures. This can be done by hiring a DEI expert. Refugees should be engaged to identify diversity within displaced communities and to co-define equity and inclusion.

### Other proposed solutions

- For organizations, RLOs and relevant experts to co-create and adopt appropriate measures and indicators of what meaningful participation means in a given context, to ensure equal share of decision-making power between refugees and NGO workers in all levels of responses, from ideation to implementation, monitoring, evaluation and reporting.
- For organizations to be proactive in integrating “significant proportions of refugee staff” in every department, particularly in leadership teams, and in their boards. This should be done in the respect of the Age, Gender and Diversity (AGD) approach<sup>52</sup>, to encourage meaningful participation in-house and to create conditions to foster refugees’ ability for open, collective expression.

## 2. Obstacles regarding the requirements for refugees' impartiality, representativeness and commitment to confidentiality

### 2.1 Impact on refugee participation in organizations' decision-making

Several NGO respondents observed the following barriers to fulfilling their pledges. Obstacles impacted their “internal participation” participation commitments, such as increasing refugee participation in their boards and staff, and their “external” participation commitments, such as to increase RLO participation in fora, processes and coordination mechanisms:

- Potential lack of impartiality by refugee participants and difficulty in seeking refugee participants that will be representative of all communities.
- Potential conflict of interest between different refugee communities.
- Potential for refugee participants to act as gatekeepers, thus not allowing others fair and equitable access to opportunities.
- Risks linked to the potential appearance of the organization to favor one community
- Risks linked to the potential appearance of the organization to favor one community or group rather than extend equal participation access to the broader refugee community.
- Potential lack of confidentiality by refugee participants.
- Difficulty organizing a selection processes for refugee participants from a bottom-up manner by refugee communities themselves, rather than top-down selection by outsider organizations.
- Concern that seeking refugee staff from other regions or countries would appear to be “hiring under the refugee label only”.
- Difficulty to diversify the socioeconomic profile in NGO refugee leadership structures, producing a gap between the persons who work within the organization's governance and the people the organization serves.

### 2.2 Critical responses to perceived obstacles

According to peer NGOs and RLOs, organizations' concerns about impartiality, representativeness and gatekeeping can be legitimate and potentially well-founded in some cases, but they can also constitute an “escape route” or excuse for NGOs to not adequately involve refugees in their work.

The first argument given by an RLO respondent was that “absolute impartiality and full representativeness are impossible”. All humans have implicit and explicit biases, and

because of the variety of cross-cutting identities (by race, nationality, gender, education, etc.) no person can be absolutely representative of any group they might belong to. “There isn’t an existing model that guarantees that people are impartial and fully representative of their community” the respondent continued, taking the example of women’s rights, indigenous’s rights or persons with disability groups. “It’s like saying to a person with a disability that they can’t work for a group supporting people with disabilities because they aren’t impartial enough”. This raises the question of why these standards are applied to refugees when they are not applied to (and would not be seen as legitimate for) other movements. One RLO leader questioned why “legitimate representation” is a prerequisite for refugee participation in the refugee response, but less so for actors without experience of forced displacement.

An RLO respondent further argued that being impartial and representative is of less concern when it comes to consulting refugees to validate or give feedback on programs already implemented. In reflecting about the selection process of refugee staff, refugee leaders or RLO participants in fora or processes, another RLO respondent identified that the sector has to “stop thinking naively” as “there will always be individuals here to serve their own interests, as in any other sector” and as such aiming for impartial representation is futile. Ensuring diversity in representation and avoiding gatekeeping is a real question which the RRLI has addressed by establishing DEI driven governance mechanisms such as community agreements. Establishing these processes ensured inclusion of all refugees in access to opportunities, and prevented gatekeeping. For various RLO respondents, selecting leaders for their skills in order to fill a specific position is also a main route to solving these concerns.

Next, two RLO respondents stated that concerns about confidentiality may arise due to a fear that refugees will learn about an organization’s internal contradictions and failures. However, the risk that refugee participants might disclose information leading to discontent among refugees was perceived as unproven. “Confidentiality” was understood by the two RLO respondents to be more about protecting information that might be embarrassing or discrediting to the organization itself. If they had access to “confidential” information, refugees might become aware of organizations’ lack of transparency and accountability, and of some elements creating discomfort in being revealed, such as the allocation of budgets toward staff salaries rather than toward what refugees could tangibly feel as most meeting their needs. The two respondents believed this was among the primary reasons that refugee staff and refugee leaders still happen to be excluded from certain meetings, committees and areas of work led by larger organizations. Whether this is a wide-spread perception within the sector would need to be further scrutinized.

This perceived connection between mistrust of refugees and a lack of transparency in budget and programming in turn may create an unwillingness among some refugees to trust humanitarian organizations or to feel that their participation and input are valued. “Just the way they receive you is very hostile” said one of the respondents. When refugees do not trust NGOs, they may perceive them as “self-serving and money-making enterprises” rather than as caring for the forcibly displaced people, noted one respondent, while another stated “then they want to have a conversation with you on their project but they don’t compensate you enough”.

Given the narrow scope of our research, it is not possible to quantify the extent to which NGOs globally are working to overcome these perceptions of exclusion and lack of transparency to those they serve. Yet one RLO respondent who frequently attends international fora on refugees noted the scarcity of other refugees in the room. They

witnessed how other refugee leaders were often denied opportunities to participate or to have their expertise acknowledged simply because of their refugee status, exposing a gap between the statements and actions of humanitarian professionals. “It can be due to pure discrimination, but also to other reasons such as a lack of organizations’ willingness to deal with the complexities of the refugee status. There’s a difficulty of traveling, getting a visa, getting to places where power is exercised, often in capitals far from where refugees live” . This observation is shared by another NGO respondent, having witnessed that “exclusion from fora explicitly due to being a refugee can still be openly communicated by humanitarian agencies”.

In the same RLO respondent’s experience, even when invited to fora, whether national or international, challenges to their meaningful participation are still there as “NGOs and UNHCR check what you say”. Thereby, they already found themselves in the situation of not being allowed to fully enjoy their freedom of speech, as they feared the potential of being “declined further opportunities”. “If you are straightforward, they make you come to a point where you feel you are insane and incorrect, but you’re just being honest”.

## 2.3 Solutions

### Good practices

- To center the selection criteria for refugee staffing, board members, and participants in fora based on their skills following the UN’s AGD criteria. This is preferable to the chimeric expectations that refugees represent the views of their whole community, as it is unrealistic that an individual can represent more than their own views.
- To take advantage of the many existing processes to guarantee the respect of confidentiality by organizations’ work forces, board members, RLO partners and/or potential participants in fora, such as signing codes of conduct, and to develop training around those codes where necessary.
- To mitigate the risk of gatekeeping in representation and access to opportunities by designing governance structures that are grounded in the values of DEI, such as community agreements. These mechanisms are enacted to avoid the identification and choice of refugee delegates of one person’s decision, and guarantee that all individuals are given opportunities. This requires “time, documentation, resources, inclusion and information”<sup>33</sup>.
- To start a sector-wide conversation on organizational structures and hierarchy to bridge the gap between top refugee leadership from within the NGO and the refugee populations the organization serves.

### Other proposed solutions

- For organizations to partner with RLOs to formulate policies, strategies and processes to develop trauma-informed and non-patronizing background checks and accountability guarantees for their prospective refugee workers and partners.
- For organizations to implement rotational representation as an option for refugee participation in their boards. Organizations should be mindful of selecting refugee board members in respect to the AGD criteria ,including delegates from non-registered RLOs.

## 3. Obstacles regarding skills and workplace cultures

### 3.1 Impact on refugee participation in organizations' decision-making and on partnerships with RLOs

#### -> Impact on refugee participation in organizations' decision-making.

Four NGO respondents noted that despite efforts to encourage refugees to apply for jobs at different levels of responsibility, there was a “lack of applicants”. They, as well as one RLO respondent, also described a tendency for applicants to not meet the recruitment criteria, resulting that “refugees are rarely shortlisted against the criteria that we have”. Having gone through different educational systems and with widely spread difficulties accessing higher education, refugees may face insurmountable competition for NGO jobs with candidates that have not experienced the same restrictions in their educational or professional background. A respondent reported that few refugees could fill NGOs' need for “highly technically skilled” individuals, who meet donors' expectations for “a project with a lot of impact”. NGOs and donors also seek quick results, but the process of hiring refugees “can take a whole year”. The need for highly educated and skilled refugee staff can lead to recruiting only those from a “more privileged background”, that have accessed higher education, or with economic capital. In regards to the principles of localization, two NGO respondents also noted a reluctance to “steal” human resources from local RLO partners, as poaching staff from these organizations may deprive them of the individuals who are their “driving forces”.

A respondent from an NGO that has hired refugee staff noted additional challenges, such as discovering that “some don't have the skills described in the resume”. Two other NGOs described the integration of refugee staff in their new functions as complicated: “It can be difficult [for the newly hired refugee staff] to honor the level of responsibility”. The most common challenge identified by the four NGOs and one RLO was the potential need for “individualized”, “continuous”, and “time-consuming” support for refugee workers. For them, acclimating refugee staff to institutional, bureaucratic, and NGO-specific norms and procedures has been an intensive process.

For another NGO respondent, the willingness to invest time and energy to train and support refugee workers can be lacking, especially in smaller NGOs, given high turnover that can, among other reasons, be due to relocation, resettlement or recruitment by other NGOs or institutions. Turnover among refugee board members was also a challenge for the respondent: “This is a concern especially in under-resourced organizations that cannot compensate refugee board members for their time.”

Respondents stated that the impact of these issues can be ameliorated or exacerbated depending on donors' understanding of the reasons for high turnover, the need for time and resources to develop newly recruited workers' skills, and how this training process influences the ability to meet tight deadlines.

## Case Study - Yoga and Sport with Refugees' challenges to integrating refugee staff in their new functions.

A respondent from this organization testified that a lack of staff capacity and resources were barriers to implementing their internal participation pledge. The respondent stated: “You need to deploy a lot of support, to send a lot of reminders, to expect people to be on time, meeting deadlines, to go to a meeting and be sure that notes are being taken, that the agenda is being met. For some of the coordinators, writing an email takes the whole day. For me, it takes ten minutes”. “More time” would be needed to enable the team to properly support and train their refugee coordinators “so they can meet the standards we expect”.

The RLO concerned by this challenge noted that it is important to “not expect less” from refugee staff, but that this stance has to be accompanied with “providing support for them to achieve all that is expected. This means strengthening their capacities to help them adapt and hone their skills, to reach all levels within the organization”. “Lack of time, resources and infrastructure” though limits the RLO’s ability to do so, therefore challenging internal mobility of refugee staff, and leaving some activities with a certain level of expectations with reduced participation. This was particularly the case for advocacy, in the RLO’s experience.

### -> Impact on organizations' partnerships with RLOs.

An NGO respondent reported that the lack of “established institutional, organizational, or financial history” within some RLOs can make their working relationship “somehow demanding in terms of certain undertaking [the NGO] should take, such as taking care of rudimentary administrative tasks that would have otherwise been undertaken by RLOs themselves, should they have the required level of independence in terms of organizational self-sufficiency”. It was also noted by this respondent that the lack of RLO capacity can add further challenges when it reinforces the already entrenched tendency of non-displaced actors in the sector of looking at themselves as the solution-finders, and at refugees “as help-seekers, who are unable to contribute to the alleviation of their own predicaments”.

For another NGO respondent, this “lack of skills” that they also label as “lack of capacity” can be tricky for co-producing programs for RLO capacity-strengthening. This respondent who made a pledge concerning RLO capacity-strengthening shared that co-designing their programs with RLO partners from the onset hasn’t occurred. Yet, this inclusion would have allowed RLO leaders to themselves identify the types of interventions that would have benefited their organizations most and to themselves establish their priorities. This could have gone with an intervention from the NGO partner to train RLO leaders, when needed, in the design, budget, and implementation of the capacity-strengthening program in which they participated. In sum, including RLOs from the preliminary phases can have a double impact to impart skills and train them how to create & administer future training.

This NGO respondent also reported that the lack of capacity of some of their RLO partners prevented their collective ability to create meaningful consortia, assigning RLOs to the role of sub-contractors rather than equal partners. This was due, among other things, to the risk-averse position of the consortium's lead organization.



### 3.2 The sector's role in creating and unraveling the "myth of skills"

Two NGOs and four RLO representatives did not consider the concerns raised above to be insurmountable. They suggested organizations had a role to play in addressing some of the causes of these barriers.

-> About the impact on refugee participation in organizations' decision-making.

One RLO respondent pointed out that the lack of applicants with the required background can in part be explained by their inability to gain experience. This can be due to displacement having interrupted their lives: "NGOs asked in the job advert for ten years of experience, but I only had five when the war started". An additional factor mentioned by another RLO respondent was that "often, refugees are not able to work with local organizations". "This friendly requirement of five years of experience... But at the local level, I've not been offered any opportunity to work with local NGOs, so how can I meet opportunities? How can I compete with people for a regional or global position?"

A third RLO respondent explained that "everyone knows that refugees face challenges of access to higher education, documentation, recognition of their qualifications. Everyone advocates that they have expertise and skills, but they are still rejected from the jobs in humanitarian organizations".

The alleged scarcity of skilled refugees was also questioned. It is a barrier that one NGO respondent said could and should be "dismantled quickly". For example, potential employers might start with different assumptions. "We can't say: here, I would like to hire a refugee but I find no one with skills. Saying this is assuming that you'll not find someone" stated an RLO that has developed a database to help national employers identify and recruit refugee candidates. "It's hard for me to swallow that out of 28 million refugees, it's really difficult to find good skills. It's proven to be wrong". "Many have, in fact, been hired in other sectors around the world" the respondent reported. "If companies are so much more strengthened to include refugees [in their staff], any refugee response organization can do it". Moreover, employees do not need to have the exact skill set if they can draw on "adaptive learning skills". Another RLO respondent gave as an example "a person with a business degree can easily be hired for an account assistant position".

Some NGOs do offer training programs (e.g., for management or leadership skills, among others), but according to two RLO leaders, training rarely translates into employment. A general training curriculum may allow refugee students interested in becoming humanitarian or development workers to access only a few specialized courses that would qualify them as the "experts" that NGOs seek. In the respondents' opinion, even when refugee students wish to apply to an organization at the end of their training programs, a sure path toward employment is not always included: "They tell you that you can then work in HR or management, but there isn't a clear career path". "They train people and then largely fail to recruit them".

In other sectors, in cases where the employer does not recognize an NGO's training program, some individuals feel their acquired credentials are worth little. Besides, there is an additional risk that training programs for refugee entrepreneurship may reinforce pre-existing patterns of inequality - particularly of gender - when NGOs train already economically vulnerable individuals in skills that lend towards precarious economic activities and that may not allow them to transcend the socio-economic strata (e.g., tailoring, sewing, soap-making).



Some respondents questioned NGOs' dedication to employing refugees, particularly in leadership teams. One RLO believed the "myth of skills" argument to be false and a double standard. "They will always find a reason for it to not be enough" the individual said, for many of the NGO employees themselves "are working on things they never studied, but learned in their first jobs". Employers can be perceived as not seeking new and challenging perspectives, but only "westernized refugees, that look like this, speak like this, act like this". "They feel like they hit the jackpot when someone has the degree, speaks like them and happens to be a refugee" said another RLO respondent.

For the second respondent, concerns about the tension between the need for ongoing individualized support and the high turnover of refugee staff are understandable "for small and medium sized organizations, who can hardly take the risk of hiring someone and not being satisfied. Internships or subsidizing income and making it grow could be an answer". "The conversation should focus on larger organizations who have the ability to do so". As for the turnover of board members, another RLO respondent recommended that: "Fair compensation to keep people engaged should be an indispensable part of the budget, especially if the organization has a program on meaningful participation".

In their reflection about how trainees will transition from their programs to employment, NGOs should consider how to themselves absorb some of the interested trainees, and identify how to facilitate hiring recommendations to other businesses in their country of operation. These gaps are part of the reason why refugee leaders are needed in the design of programs from the onset. If the number of refugees trained is a satisfying performance indicator for NGOs, it doesn't guarantee that the outcome will be a real change in trainee's lives.

***"They'll train you, and then you'll go back to your poor job because no organization wants to hire you" - RLO respondent.***

Each of these factors result that some of the respondents think organizations' willingness plays a major role. "It is not about the skills, it's about the mindset". The "myth of skills" can be used as a way to give "good consciousness" to organizations, "it's a way to say, I tried". "If NGOs are really interested, they will find [refugee staff]. It needs mapping, data, and reaching out. It needs effort but it's always political. If we really want, we find a way to do it".

One barrier occurs when "the call for application is being sent one week before the deadline. It doesn't give you time to apply". A second barrier is a difficulty for refugees to own and access databases where they can highlight the skills and expertise they have for prospective employers. In this context, it was reported by two RLO respondents that many refugees and RLOs can feel frustrated and perceive a certain "hypocrisy from UN bodies and NGOs", when asked to join an advisory board or panel to give advice on projects already set, without much concern for their qualifications. "Only when you work for little compensation and benefit their image, then they'll want you".

Per one RLO respondent, organizations are more critical of refugees' skills and expertise when they consider them for employment, but are less so when selecting refugees as "experts in a panel" to be "advisors for their organizations"- adding a layer the respondent describes as "tokenism", or the tendency of "believing refugees can be advisors but not employees".

The respondent adds:

***“I [male] have been asked to be on a panel about refugee women’s rights. Why would I be on this? This is not my area of expertise. I’m trying to tell NGOs that if they are getting someone because they think they are important and not hiring them, they’re hypocrites. When it comes to employment, they start to pay attention to the background and experience.” - RLO respondent.***

One RLO respondent described organizational concerns about hiring refugee staff located within their geographic region of operations as legitimate. However, to reach their meaningful participation goals, the respondent advises organizations to prefer recruiting a refugee candidate from another region, rather than hiring a non-refugee candidate, when local refugee applicants do not fulfill job criteria. For another RLO respondent, working in another region “can be the best way to adopt the experience of another community and implement my experience to that community”. They shared their own experience in doing so: “I was the first Afghan citizen to visit Rwanda. It was such an amazing experience to see the lives of refugees there. It let us see ourselves in each other and recognize how our issues and challenges are similar”. Yet, they noted that their opportunity abroad was an exception that few refugees, even those with specialized qualifications, can access. They stated “one person has limited resources and the other could have a lot of opportunities but due to strict restrictions, we can’t do anything together or share experiences”.

Finally, for two RLO respondents, the myth of lacking skills may, similarly to concerns about representativeness and confidentiality, ultimately stem from NGOs’ potential lack of transparency and accountability, and the fear of creating discontent among refugee communities.

Whatever the reason for the limited employment of refugees, it can become a self-perpetuating cycle: the belief that they will not get hired can discourage individuals from even applying. “Many fellow refugee leaders are getting hopeless, it doesn’t matter if they apply or not, they know they’re not going to get it”. Applying requires “not only time but also emotions” and can lead to despair given that many organizations do not give proper feedback. “It becomes very distressing emotionally, especially when you receive awards from certain organizations, or when you are being asked on an advisory board, so people don’t apply”.

### **-> About the impact on organizations’ partnerships with RLOs.**

The perception of refugees as aid recipients in the sector coupled with the “myth of skills” can lead to a situation where organizations do not communicate well with RLOs or collaborate to generate transformative opportunities. This scenario reinforces power imbalances between RLOs and traditional humanitarian actors. This can particularly be the case for NGOs specialized in strengthening RLOs’ capacities, whose programs, fundings and communications can be harmful, patronizing and counter-productive when not strategized along with refugees. “Wanting to do well is not necessarily synonymous with doing well”.

The Humanitarian Policy Group (HPG) Report “Rethinking capacity and complementarity for a more local humanitarian action”<sup>34</sup> formulates key takeaways that might greatly enrich organizations’ reflections on the notion of “capacity” and where it is located. The report echoes the value of accompanying organizations’ efforts to work along RLOs with a process to transform their workplace culture. However, given that large organizations often operate within unequal systems where workers have limited agency for this

transformation, caution is warranted in ascribing these organizations the primary role to define 'complementarity' and to assess RLOs' capacities.

### **Asylum Access (AA) and the RRLI: A Case Study - changing the organizations' workplace culture to improve the quality of working relations with RLO partners.**

The respondent from AA Headquarters defined the ultimate goal of the organization's "DEI journey" was to dismantle the workplace culture they designated as "white professional culture". The respondent defined this culture as "the capitalist society values defining our way of working - such as competition, growth, worship of the written world, among others - which the portion of people who are put in a position to succeed, as opposed to people marginalized by design, are victims of". AA circulated a worksheet internally to help staff identify these values<sup>35</sup>.

Through a coalition of five RLOs having come together with AA, the Resourcing Refugee Leadership Initiative (RRLI) raised over 12.5 million USD in funding that is deployed according to innovative principles of funding and partnerships with RLOs<sup>36</sup>. The RRLI RLO-to-RLO fund<sup>37</sup> is considered as a game changer in the refugee system for its approach and values "for 70% of the RLOs it is the biggest grant they ever received, for 30% it is the first grant they ever received". For the respondent, AA's internal transformation towards inclusivity and the success of the RRLI project<sup>38</sup> "were building off one another the whole time".

AA's DEI training enabled its staff to examine that how they assessed skills was rooted in a specific type of professional culture. This limited view was blocking AA from fully acknowledging other types of skills, knowledge, and expertise. Their DEI process has led to a better understanding of coalition partners' role and capacities: "It was the condition for equitable partnerships to be established". "I realized these are the values I've been trained in my whole life. If I wasn't going through all that learning at the same time, I could have been an obstructionist. I could have said I know better a thousand times when I didn't" stated AA former leadership team member, who hasn't experienced forced displacement. "I was seeing in real time with the coalition meetings what was discussed in the training. To ask the folks if they want to talk differently, to develop a mutual greater respect [...] The link between the training in cultural intelligence and the just profound differences in the ways of working was alive, there was a real difference in the way we talk. We were not talking over each other".

## 3.3 Solutions

### Good practices

-> Internally - to increase refugee applications in organizations' hiring at all levels:

- For organizations to aim for “a systemic organizational change” as a result of their DEI processes including assessment, training, roadmap and metrics (see p.18, good practices and AA case study). Creating an inclusive environment for refugee staff requires “not only a few training sessions” but “a lot of unlearning, and a deep diagnostic of the workplace system - how we do project meetings, the way we talk, our HR policies, our mindset and behaviors”. This operation dismantles the “processes that perpetuate the dominant and often excluding workplace model, and its manifestation in job descriptions and criteria used to evaluate applicants”. Collaboration with RLOs helps illuminate which hiring criteria are reasonable or unreasonable to expect from refugee applicants in a given context.
- To hire a DEI expert with experience of forced displacement in order to support organizations in this transformation. At minimum, experts hired into DEI positions would have relevant experience to speak to “the specific identities” of the organization it supports. This will allow the DEI analysis to more precisely identify diversity within the broader community and clarify what equity and inclusion could look like in the specific context of the organization’s operations.
- To simplify the recruitment process and to make it more flexible for refugees to be fairly considered, acknowledging refugees’ unique barriers to accessing higher education, work experience, to transfer prior educational or employment experiences and credentials. “Formulating the job offer differently”, “asking for background, things candidates are proud of, volunteering experiences, thematic questions becomes the most important part of the process”.
- To develop programs establishing a refugee-led mapping and data-base of refugee talents, and to facilitate referrals and matching between employers and refugee candidates.
- To become an attractive employer for refugees “by building the reputation, putting the message out and manifesting the work done on internal change publicly”. “The more you recruit, the more you have visible refugee leadership, the more people are applying”.
- To organize specific outreach strategies to promote new employment openings and training opportunities (e.g., through outreach days and communications, RLO networks, facebook and WhatsApp groups, communities), acknowledging that recruitment and hiring processes may take longer than traditional recruitment.
- To increase the recruitment of junior refugee staff, dedicating appropriate financial and human resources to support their upward progression within the organization.
- To educate donors and other stakeholders to the DEI approach in hiring practices when they have control or influence over recruitment, and to advocate for more inclusive hiring practices in the refugee response.

### To better welcome and integrate newly hired refugee staff:

- To encourage internal mobility through in-house professional development, such as paid internships, temporary positions or trial contracts, with the expectation that if the person is effective they will be given a permanent position, and also:
  - With a particular emphasis on individualized training and support. This can be done by advancing a one-on-one staff training model through which staff members train newly arrived refugee staff to be conditioned to take over their role when they leave, but also through more alternative models such as by paying for private lessons.
  - With a minimum of six months for the first contract in order to give the newly hired staff enough time to familiarize with their function.

### To favor engagement of board members from a refugee background:

- To support individuals to register themselves as consultants providing a service and include their fair compensation as part of the budget for meaningful participation.
- To develop specific training in “political participation” such as learning about power analysis, or active participation in decision-making instances, as a means of conditioning individuals to succeed in decision-making spaces, and ensuring that participation replaces the consultation model. “More NGOs should specialize in training refugees in political participation”. “If refugees are not trained in political participation, they can hardly do more than being consulted”.
- An NGO respondent created a refugee advisory board in parallel to its other boards, with “as much control over strategy, decisions and resources of the organization as any of our other boards”. Organizations developing refugee advisory boards should indeed be aware that the advisory function without associated decision-making power does not go beyond step 5 (refugee leaders are consulted and informed) on the eight steps of refugee participation.

### -> Externally - to improve the quality of working relationships with RLOs in a context of “lack of capacity”:

- To address the lack of institutional, organizational, and financial history of RLOs, by “working closely with RLOs at the lowest level of the cooperation spectrum, to contribute to strengthening their capacities”.
- In the case of capacity-strengthening programs, to jointly set the performance indicators with RLO partners and to include refugee staff in monitoring and evaluation.
- To redefine policies and design capacity-strengthening programs with RLO partners after applying DEI-inspired changes to an organization’s structures.

## Other proposed solutions

-> Internally - to increase refugee applications in organizations' hiring at all levels:

- To standardize refugees' inclusion into HR departments to develop new, specific and appropriate strategies to increase hiring refugees as staff.
- To follow-up with candidates who are not short-listed to explain clearly why they were not selected and to provide recommendations on how to improve their applications.

-> Externally, on advocacy:

- To educate and lobby all organizational donors about the need for specific resources to support meaningful participation, especially by explaining the time and budget needed for ongoing support, from entry to the ascension to jobs with higher levels of responsibility.
- To document the processes and outcomes of integration of refugee staff for advocacy purposes.
- To enhance genuine relations with universities and to develop targeted, continued and objective-driven advocacy with them for more flexibility in refugee enrollment.

-> For organizations specialized in employment and vocational training for refugees:

- To engage critical reflection, along with refugee experts, on how training programs actually transition graduates into employment, such as on how to absorb some of the trainees or to facilitate career paths in other businesses.



## 4. Obstacles of national legislations

### 4.1 Impact on refugee participation in organizations' decision-making and RLOs' ability to survive

In many countries where national legislations bar refugees' inclusion into the formal economy, humanitarian organizations face legal barriers to implementing aspects of their "internal" and "external" meaningful participation pledges, such as hiring refugees, formally co-designing programs with RLOs or partnering with RLOs for service provision. The reasons for legal restriction of meaningful refugee participation in a given country can include xenophobia, the perception of refugees as law breakers, the association in policy and media discourse of migration with insecurity or terrorism, the unfavorable nature of diplomatic relations between hosting countries and countries of origin, the level of unemployment in hosting countries, and a limited understanding of refugees' positive economic impact<sup>39</sup>.

In the following examples, we highlight variation in how laws that govern refugees have challenged five pledge-makers's commitments for meaningful participation.

-> Impact on refugee participation in organizations' decision-making.

Country 1 is not a signatory to the 1951 Convention. Refugees are not legally recognized and cannot access national IDs. Having a team (particularly at higher management levels) composed primarily of refugees, seems "unrealistic, unfruitful and risky" for NGO 1: "We wouldn't be able to operate anymore". In addition, the law in Country 1 does not permit tax deductions for donations to refugees, limiting this NGO's financial capacity to compensate refugees for their participation in its board.

Country 2 is likewise not a signatory to the 1951 Convention. NGO 2 had to reduce its target for refugee recruitment from 50% to 30% and to present them as volunteers rather than paid employees. Even within the organization, refugees are limited in the roles they can perform. They can work in civil society spaces (e.g.: meeting with other NGOs, humanitarian coordination spaces) but not in activities that would prove risky, such as direct encounters with state authorities.

Country 3's refugee legislation authorizes the issuance of work permits, but this hasn't been implemented at the time of interview, thus discouraging NGO 3 from pledging to include refugees in its staff. While refugees are consulted in programming, they are not involved in other internal decision-making processes, such as budget and agenda-setting.

In Country 4, there are difficulties paying staff who are seeking asylum, reports NGO 4, due to the unwillingness of donors to be associated with informal employment and the risk of labour exploitation it can create. Asylum seekers are therefore employed without contracts and paid up to 400 USD per month for twenty-eight hours per week (or less than 4 USD per hour).

While many advocates push for refugee inclusion in the formal economy, the majority of the world's refugees are hosted in developing nations with limited formal economic structures or protections<sup>40</sup>. In this context, refugees, like citizens, often seek opportunities across the

informal economic sector. However, many organizations and RLOs can be prevented from creating or implementing informal employment methods due to donor requirements for formal documentation.

#### -> Impact on RLOs' ability to survive

In Country 5, the requirement to obtain work permits and the impossibility to open a bank account has limited RLO 1's ability to get funds to enact its pledge.

In some of the respondents' countries, policies can limit registration to RLOs that have a bank account and can pay fees, which generally corresponds to those that are already well-established or have a national staff on their leadership team, which may alter the nature of what is meant to be a refugee-led organization. RLOs can also struggle to pay the often high fees for legal registration. Lacking registration in turn impacts RLOs' ability to fundraise, especially internationally, and to develop their institutional, organizational, financial capacity and programs.

Lack of recognition through legal registration has been described by respondents as a structural issue that hampers RLOs' long-term sustainability and precludes the establishment of new RLOs and the development of new programs. These barriers may thus block the creation of innovative projects that address refugee-defined needs, with the risk of leaving these needs unanswered by other actors. One positive note is that certain NGOs have identified this shortcoming and work specifically to get RLOs legally registered. Furthermore, the opportunity for RLOs to apply for funding through consortia with legally-registered organizations is being popularized<sup>41</sup>. UNHCR has also taken steps to address this issue by developing the Refugee-led Innovation Fund with no requirement for organizations to be legally registered to apply<sup>42</sup>.

## 4.2 Embracing the complexity of legal limitations

#### -> Access to work permits and impact on refugee participation in organizations' decision-making.

One RLO respondent found it understandable that some States aim to reduce the issuance of work permits because of unemployment problems. Yet other respondents believed organizations should not limit refugee employment even with unfavorable regulatory frameworks.

For an NGO respondent "peer NGOs need to acknowledge that having no trouble accessing work permits is a privilege, and also a complex journey for forcibly displaced people. The sector needs to embrace the complexity of not having access to a work permit". This interviewee regretted the litigious culture in which NGOs evolve, making them "spook" about the idea of hiring individuals without a work permit. For the respondent, organizations' mindset about risk management might therefore constitute another barrier. "Something is happening in our mind about a risk not coming to fruition. Risk management isn't thought through and we make a barrier out of it". When trained in risk mitigation - again, depending on the contexts - organizations can realize that the "intensity of the risk and the likelihood of it coming to fruition may be low in general".



## Case Study - Youth Voices Community (YVC) - Example of accessing employment in 2020 in Kenya.

A refugee leader respondent from YVC in Kenya stated that for getting their job in a company in 2020 “No one asked for a work permit, I’ve just been asked for a Kenya Revenue Authority (KRA) pin for taxation processes. Work permits are for foreigners, refugees are residents. It is just that getting a KRA pin is complicated because for most refugees, IDs are not integrated in KRA systems, hence the employer has to facilitate the process by giving a letter of offer. I then need to go to the Department of Refugee Services to obtain a letter that I take to KRA. So the employer made an effort so that I can get the KRA. Imagine all that for an employer that doesn’t understand. In an open position, you have a refugee and Kenyan on the same competency level, but the refugee lacks the ID or for those who possess the refugee ID, their ID is not recognized, and they lack the KRA pin, the bank account. So you take the guy who has the documents. Employers don’t have the time or the knowledge to write the letter of offer to refugee candidates. If the refugee had its KRA pin from the onset, it wouldn’t be a problem”.

For this respondent, this issue is an example of how refugees can perceive a lack of proactiveness by refugee governance actors including States, NGOs, and UNHCR to standardize employment procedures. They particularly felt UNHCR could have the power to influence States and potential employers around the world.

### 4.3 Solutions

#### Good practices

->To increase refugee participation in decision-making of organizations that operate under unfavorable national legislations, or where rights cannot be accessed in practice:

- NGO 2 and RLO 1 transfer refugee staff payment in cash, in the form of a package including extra for medical care and with a salary scale comparable to that of national employees. RLO 1 explains this is made possible by its donor’s willingness to support alternative forms of salary payment and their great interest in RLO 1’s successes, leading to ongoing funding.
- In lieu of direct salary payments, NGO 4 compensates refugee staff with cash, food vouchers, and housing. This practice lessens the gap between national and refugee staff.
- RLO 1 and NGO 2 present their staff as volunteers rather than as paid employees, and do not organize staff meetings with national authorities. In so doing, NGO 2 creatively allows for more direct refugee participation in ways that minimize legal or punitive harm to refugees.
- NGO 2 has also established and programmatically supports a refugee-led advocacy network, addressing recommendations via digital medial and fora without disclosing its members’ identities or location. Virtual meetings are conducted to avoid the high risk of arrest for in-person advocacy meetings.

-> Externally - on advocacy to foster meaningful refugee participation in the context of unfavorable national legislations, or where rights cannot be accessed in practice:

- Through collaborating with RLOs, NGOs 1 and 2 engage in education and advocacy to government officials to deconstruct the perception of refugees as a security threat and to demonstrate that their socio-economic inclusion is beneficial.
- NGOs 1 and 2 similarly engage in diplomatic briefings and advocacy to governments in their region.
- RLO 1 serves as an ambassador and uses its relationship with one donor as a model for other donors to draw from and to support RLOs despite unfavorable regulatory frameworks.

### Other proposed solutions

-> For internal participation - for organizations to address the complexities of refugees not having access to work permits:

- To acknowledge that temporary solutions such as engaging refugees as “volunteers” with a fair allowance are insufficient measures and to develop long-term solutions with the ultimate goal to offer refugees equitable salaries and movement toward higher positions, such as:
  - To ask refugees what their preferred method of employment is and to adapt accordingly.
  - To use Professional Employer Organizations (PEO) to help employ people who can't access advantages of traditional employees.
  - To subsidize the often high fees for work permits.
  - To train in risk mitigation and determine if there are legal risks of employing refugees in leadership roles. Organizations can then engage in risk mitigation strategies to identify genuine risks and not deter any refugee recruitment into leadership roles based on hypothetical risks. Exclusion should only occur when there is a clear risk to formal refugee participation.
- To refer refugee talents to NGOs working in more permissive environments. “If I am in Zimbabwe and I have the opportunity to study but I'm not allowed to work, then I can go to Kenya and work there. I'm able to do a lot, I just need opportunities for my capacities or skills to be utilized”.

-> Externally - on advocacy:

- For UNHCR, NGOs and the private sector to join efforts to influence States to legalize more pathways to formal sector employment. “This includes a risk, but if the will exists from NGOs, they can find something to pay back to the government”.
- For UNHCR to organize forums on refugee inclusion, inviting government officials, members of parliament, and leaders across sectors (e.g., financial, commercial, retail, etc). Refugees should be involved in all stages of planning these forums from setting agenda, establishing the selection process for potential attendees, and engaging in discussions.

## 5. A sector too little engaged in deconstructing its hierarchical system

A majority of interviewed RLOs and NGOs critiqued that the hierarchical structure embedded within the refugee response presents challenges to enacting the anticipated long-lasting impact of their meaningful participation pledges. Respondents reported this hierarchical structure has reduced opportunities to replicate internal participation pledges, and reduces the likelihood that “internal” meaningful refugee participation will become a new norm in the sector. It also impacts the long-term results of their pledges to support RLOs, as once they have strengthened capacity, RLOs may still confront a broader refugee response system unready to interact with them as equal partners. Therefore, a majority of respondents argued that the nature of the refugee regime needs a power shift so that their pledges are not isolated or anecdotal acts such that true meaningful participation can occur.

### 5.1 Coming to terms with the need to share power

The five RLO respondents, joined by five NGOs, thought that most of the sector’s engagement towards meaningful participation was closer to “window-dressing” rather than approached as a restructuring of the humanitarian and development system.

One of the major barriers identified by three respondents was the “lack of willingness to let refugees get in the decisions behind closed doors”. “Ad hoc participation is accepted but not involving refugees in the long term”. For three RLO respondents, even when they are at the table, refugee leaders’ recommendations are rarely translated into actions. Respondents reported that organizations having invited them to bring input or feedback did not follow-up after their participation, nor explained why their ideas were not implemented. They interpreted this as a lack of real commitment to meaningful participation.

***“Most organizations say they want to include you in decision-making but don’t want to hear you, they reduce you. They engage people in the decision table but do not appreciate their recommendations so it is not meaningful [...]. Partners want to do their operation only, not to hear when you say they leave part of the problem unsolved.” - RLO respondent.***

For an NGO respondent, a contradiction can be found in the rhetoric heard in the sector since the beginning of the COVID crisis when international staff of NGOs were no longer on the ground, between the calls advancing that “refugees are best placed to answer the needs of their communities because they know their communities the best” and the processes still in place, where the “framing, planning, and reporting” of programs are not owned by refugees. “Someone based in a far capital many hundred of miles away can’t create a perfect response to everyday local priorities”. For the respondent, to create solutions that are context and situation appropriate, “refugees need to be able to control the narrative of success”. “It is vital that the success framework is defined by refugees, not only by the international aid community. Not all the reporting of progress has to go through the funnel of INGOs and UNHCR”.

-> About internal participation: pledge-makers self-reflection to sharing power.

Among the seven NGO respondents who made pledges for internal participation, four explicitly mentioned commitments to increase participation in their leadership team and board: one in the leadership team, two in the board, and one mentioned both. Despite a small number of commitments in this area, this still reflects an emerging adherence to the idea that to achieve full meaningful participation, organizations should reassess who sits at the locus of power.

For an NGO respondent, given that the majority of funds and power are still held in international organizations, it is necessary for these organizations to be led by refugees for meaningful systemic transformation to happen.

***“If your organization has more resources than the RLOs have, supporting them without internal transformation does not allow for systemic change to happen”  
- NGO respondent.***

The five RLO respondents believed that despite positive interpersonal interactions with some NGOs and an increased language promoting diversity, there is a low priority given to include refugees in positions of power: “Organizations need to work on how they share power so participation becomes meaningful and not only checking a box. I still struggle with fellow refugee advocates, saying that this organization is great, that they met the head and it’s a very genuine person. I’m asking: Did you look at the management, budget, financial plans and statements? Someone can be the best talker on earth but when you check its organization, zero executive management staff are refugees or even people of color. All of them are white. The director is white, the coordinator is black or a refugee, and there’s a sentence above saying they’re diverse”. “Most NGOs that have programs for refugees and that advocate for the democratization of humanitarian aid, if you look at their board and management, you hardly find persons from the refugee background. [...] We want to be involved in policy-making without anyone acting as the bridge for our involvement”.

For another RLO respondent: “everyone strengthens RLOs’ capacities, everyone wants to be trendy, to say ‘yes, I recruited’ just to show off. The question is if you believe in it or not, in the benefits and the rights of meaningful participation. If you believe in someone, you need to normalize that they may transition into your role. Refugees have developed themselves in their role and now have the right to play a leading role”.

Following language common in DEI discussions, two NGO respondents emphasized the need for those in leadership roles, particularly with non-diverse boards or managing teams, to couple their reflection on meaningful participation with a reflection about how to step back and cede power.

***“Refugee leadership doesn’t mean that there isn’t a role for you, but there is a need for privileged persons to step back and stand besides those whose interests are concerned. It means that you become an ally who creates space for others to lead.” - NGO respondent.***

For the same respondent, resistance within organizations across the sector to engage transformation processes might come from an unconscious defense mechanism linked to the concept of “fragility” around one’s own role, which can manifest through the feeling of “being attacked” and of seeing its “technical skills being understated”. They reported having

personally felt “anxiety at the initial stages of the conversations” in their organization, deriving from “the important weight of identity issues”. For them, the DEI process precisely can overcome this step that they categorized as “the tip of the iceberg”, but that can “inadvertently uphold the system as it stands now” when not tackled.

-> About external participation: pledge-makers’ reflections on capacity-strengthening approaches and the perpetuation of power inequalities.

Per one RLO respondent, “you can’t tell someone that you financially support RLOs and partner with them while you still see us as inferior, not as equal partners”.

In the area of capacity-strengthening, even among NGO respondents pursuing the goals of reaching step 7 or 8 on the ladder of refugee participation, refugee leaders are not systematically involved in the design process of programs meant to support them, leading NGOs to often “end up having the last word”.

### **COHERE’ self-reflection about patronizing attitude in capacity-strengthening programs**

Despite committing to supporting refugee leadership in the refugee response and to working equally with refugee-led partners, Cohere recognized gaps remain in their own programming for capacity-strengthening to RLOs. In an interview asking their staff whether team members at Cohere saw themselves as equal partners with RLOs, 40% of respondents answered that, in general, Cohere staff often demonstrates a sense of superiority or patronizes refugee leaders.

For an NGO respondent “there’s no difference to the project outcome” whether refugees are involved or not in decision-making around the capacity-strengthening program, since the process is already designed”. For another NGO respondent, the model chosen to reach the most meaningful form of participation is that “RLOs have ownership on their own decisions and influence ours”. This situation might reflect a confusion on whether NGOs supporting RLOs through capacity-strengthening programs without equal shared decision-making powers, are located at step 7 on the ladder of refugee participation - with the argument that NGOs would support refugee-initiated and directed programs, or at step 5 - with the argument that NGOs would seek refugees’ input on their programs by consulting RLOs. In the second scenario, NGOs would hold the power to validate or not RLOs’ feedback, and would inform RLOs about the decisions made to integrate - or not - their feedback in the program). We argue that the second NGO respondent’s practice (“RLOs have ownership of their decisions and influence ours”) would correspond to step 5 rather than step 7. We interpret step 7 as not referring to programs where an NGO would support and strengthen the capacities of RLOs that are newer or smaller. Instead, in our interpretation, the standard for step 7 is only reached when larger programs are initiated and directed by RLOs, and where RLOs decide on how to involve NGOs as partners in a supportive role.

This can lead to situations where RLOs may receive an offer without having formulated the real need, knowing that, in a situation of lack of opportunities “refugees and RLOs can say yes to whatever is given from the person with power and money”. An RLO respondent stated “most NGOs are giving training on things RLOs will not use afterwards, because they actually need something else”. “They tell you that ‘to be good, your financing system needs to be like that’ but the priority is elsewhere and varies from one organization to another”.

Additionally, four RLOs and two NGOs considered that the amount of funding for RLOs that usually goes with capacity-strengthening programs (around 5000 USD per grant per project) is insufficient, even when the grant funding is open and can be used for implementing programs or purchasing equipment. The RRLI stated that UNHCR’s grant agreement for RLOs of similar amounts “falls far below what RLOs require to implement impactful and sustainable projects and programs in their communities”<sup>43</sup>. The NGO-to-RLO sub-granting process may further result in NGO gatekeeping, and exacerbate issues when they do not provide funding for core costs, if the funding is not multi-year, flexible, supportive of potential difficulties, and is not based on trust or efforts to facilitate connections with other potential funders<sup>44</sup>.

Despite a progressive change in language and the expanded use of expressions such as “capacity-strengthening” or “capacity-sharing”, an RLO respondent stated that even the dynamic of “capacity-building” can reinforce, instead of challenge, the hierarchy between NGOs and RLOs. This can act against the driving logic for empowerment and participation. They described the propensity of NGOs to develop a complex of superiority and interact through their programs with RLOs as “people struggling, lacking information and needing knowledge and skills from someone who knows more”, which can only be provided by organizations through strengthening their capacities.

The respondent proposed developing an alternative approach in which RLOs initiate capacity-strengthening programs by first determining their own training needs, then approach organizations to evaluate whether they are in the best position to provide the training. In the case the organization approached isn’t able, they would have the responsibility to connect RLOs with relevant experts: “Organizations should know refugee experts in the requested domain, with academic background, to train the RLOs”. “They can help the RLO contact these experts or provide funding for an expert’s services”.

Some NGOs specializing in capacity-strengthening have already tried to make efforts to share power on their capacity-strengthening programs, notably through the “train the [refugee staff] trainer” principle, which is gaining traction. However, this model may still be tokenistic if refugee trainers are permitted only to implement trainings rather than invited to design programs. Moreover, the ‘train the trainer’ model hardly addresses power differences between non-refugee staff and staff having experienced forced displacement. It can even widen them by emphasizing the gap between “high-level decisions” (controlling budget and setting priorities) managed by non-refugee staff and “programmatic decisions” where staff with a refugee background are often confined. This dynamic can be confirmed by comparing the salaries of trainers having experienced forced displacement to those of national staff who do similar work.

Even in NGOs that claim to be allies of meaningful participation, non-refugee staff often maintain the power to determine the scope of refugee participation. They may also find it difficult to act as facilitators rather than leaders and initiators of ideas and programs. This aligns with Mohamed Duale’s analysis that stakeholders in Kenya tend to treat refugees as “unthinking subjects while promoting initiatives to empower refugees”<sup>45</sup>, a perception

that may be rooted in the lack of willingness from organizations' workers to confront disruptive feedback, disagreements with policy paradigms, or to move beyond the status quo.

On the podcast “(Un)filtered” with the Co-Managing Director of R-SEAT Rêz Gardî<sup>46</sup>, James Milner was asked: “What are the challenges, the barriers, the risks that [States and other actors] are perceiving, that is preventing them from embracing [participation and localization] too quickly?”. Milner pointed to “power”: “Sources of power don’t relinquish power willingly or quickly or easily”; “interest” in perpetuating the current system and “inertia and the sense of risk” as barriers to refugee participation. He described the refugee response system as aware of the imperfection of its approach but considering that it is “better than nothing” because “the structure, however imperfect, [is] deeply embedded in the way of doing things”, and that, therefore, progress can only be made slowly.



## 5.2 UNHCR's role in advancing meaningful participation

In recent years, UNHCR has shown an enhanced willingness to support refugee participation. The organization committed to work towards greater localization during the 2016 WHS, and committed at the 2018 GCR to foster meaningful participation of refugees.

Engagement with Community-Based Organizations (CBOs) as a way of putting “forcibly displaced and stateless people at the center of decisions that affect their lives”<sup>47</sup> is rooted in UNHCR's Community-based protection approach as well as its 2018 AGD policy.

Since 2020, UNHCR has made great efforts to further strengthen its engagement with forcibly displaced communities. These have notably materialized in the creation of a cross-divisional “Task Team on Engagement and Partnership with Organisations led by Forcibly Displaced and Stateless People”, with the mission to “coordinate and align internal efforts and to support various work streams related to UNHCR's engagement of and partnership with forcibly displaced and stateless people-led organizations”<sup>48</sup>. The task team has sought to promote refugees' participation in designing their strategy by working alongside an interim advisory group who acts as a “representative body for organizations led by forcibly displaced and stateless people” with the aim of playing a “critical role in the development of the deliverables of the Task team”<sup>49</sup> - an approach that echoes commitments for internal participation made by the GRF pledgers.

Significant progress was made by UNHCR in their support to organizations led by forcibly and stateless persons, particularly through increasing the size of grants for these organizations through its 2022 Refugee-led Innovation Fund<sup>50</sup>, and by making its eligibility criteria more inclusive. The Refugee-led Innovation Funds is forward-looking and meant to provide a holistic support mechanism combining financial resources (up to 45 000 USD), mentoring and technical expertise to both registered and unregistered organizations. The RRLI commend this fund for offering “a broader definition of person of forced displacement” and “no limit on what thematic or impact areas applications should address”<sup>51</sup>. This call stands in contrast to previous UNHCR calls, such as the 2020 NGO Innovation Award for Refugee-led Organizations<sup>52</sup>, which provided a maximum of 15 000 USD in recognition of past activities, and the UNHCR Grant Agreement for Organizations Led by Displaced and Stateless Persons, which offered up to 4 000 USD per grant/project and up to 12 000 USD in total funding per year for “grass-root organizations whose activities are based primarily on volunteer efforts and provide advocacy, protection and assistance services at community level”<sup>53</sup>.

Other objectives set by the Task Team under the framework of UNHCR Strategic Directions 2022-2026 also demonstrate UNHCR's endeavors to meaningfully support RLOs, and to align their work with best practices held across the sector. Among other recent efforts, UNHCR has also developed an “information repository for organizations led by displaced and stateless people”<sup>54</sup>, a global “mapping of organizations led by forcibly displaced and stateless people”<sup>55</sup>, an internal repository of resources to enhance UNHCR staff engagement with local organizations, internal guidance documents (including on the meaningful participation of refugees in global events, and the engagement and partnership with organizations led by displaced and stateless persons at all levels - field/country operations, regional bureaux, and HQ), and established an Advisory Board of Organizations led by Displaced and Stateless Persons, from December 2022 to December 2024.



This progress and rate of change is commendable for UNHCR being an institution of almost twenty thousand staff that has been in existence for seventy years, working in one hundred thirty-seven countries. Seventy-eight member States make up UNHCR's Executive Committee and so changes in structure and the way of operating are subject to political and diplomatic constraints. A respondent RLO recognized that in their country of operation, UNHCR's ability to promote meaningful participation of refugees is limited by political issues, and is generally when host countries perceive refugees as threatening or harmful. "It can be hard for UNHCR to put accountability on the host community. UNHCR tries to find a middle way, but this goes back to how much the host community is giving space for UNHCR to be involved and innovate". Given the size and scope of UNHCR's work and the varied contexts in which it works, it is not surprising that there is a varying degree of UNHCR's leadership in meaningful participation, and a varying external perception of UNHCR's role in enabling meaningful participation.

### -> Respondents' reflections on UNHCR efforts.

For UNHCR to play a more significant leading role in enabling meaningful participation for refugees will depend on reflections from the organization as a whole as to how their current ways of working, as well as their up-coming initiatives, can be rigorously assessed against the ladder of refugee participation. This paper provides some examples of how this reflection can progress. The following two points highlight the perceptions of nine respondents from six geographic regions on UNHCR's global approach and efforts, with their associated recommendations. The views of the small number of respondents in this paper may or may not be representative of views held globally on UNHCR's progress in enabling refugee meaningful participation, but the topics covered in their responses bring to the surface issues that should be central to on-going discussions in UNHCR's role in meaningful participation.

Respondents' perception of UNHCR's efforts for participation fell between step 3 (tokenism), step 4 (refugees are assigned but not informed) and step 5 (refugee leaders consulted and informed) on the eight steps of refugee participation. They suggested that UNHCR engage a critical reflection about its institutional practices and mechanisms developed in order to enable meaningful participation in the sector. They highlighted this reflection should be done with RLOs and other partners, and with knowledge of UNHCR's multilateral limitations. Given UNHCR's central position, aligning its engagement to the highest level of participation models already implemented would not only transform and improve its own policies and programs, but would anchor the new standard of participation to follow.

### -> Calls for enhanced transparency in how UNHCR will internally apply its "participation revolution"<sup>56</sup>.

Some RLO and NGO respondents lacked information about how UNHCR's critical reflection to pursue meaningful refugee participation is unfolding within the organization's own structure. They felt UNHCR's internal systems and structures could hamper the outcomes of its engagement with RLOs, as well as the realization of meaningful participation in the sector in general.

According to three RLO respondents, "UNHCR's decisions are carved into stone", "there isn't an opportunity to say things as they are". These respondents observed that refugees "almost never figure in UNHCR's high management staff" nor are they "involved in ideation of programs or high-level decision-making". These statements are difficult to verify. Indeed, UNHCR communicates on the "many colleagues who have personal experience of

forced displacement”<sup>57</sup> within its structure, albeit without sharing statistics on how many staff have lived experience of forced displacement and on which positions.

For an NGO respondent, the movement to cede power from non- forcibly displaced to forcibly displaced persons is constrained by the norms and trends embedded within the current power structure of the refugee response. The NGO found that UNHCR, as the central organization of the refugee response, has the power to either slow or accelerate progress towards changing this dominant model.

Some respondents observed champions within UNHCR who are willing to defend transformative degrees of refugee participation in-house, but felt that the UNHCR staff “lack internal power or influence to provoke change”. It was also described by two respondents that the appreciation for meaningful participation can greatly vary from one UNHCR staff member to another. This suggests that internal guidance and training on the definition and implications of meaningful refugee participation in terms of degrees of meaningfulness and streams of participation would benefit the organization’ efforts and the sector in general. This material could be based on the GRN ladder of participation, and would greatly complement internal resources already created by the Task Team to enhance UNHCR staff engagement with local organizations and meaningful participation of refugees in global events.

-> UNHCR’s external engagement for meaningful refugee participation: The need for higher ambitions.

Four respondents complained about how UNHCR interacts with refugees who work within NGOs and RLOs. For an NGO respondent who has experienced forced displacement “there are learning gaps in the way they interact with us, people don’t even understand that they are working against the interest of meaningful participation, reinforcing power dynamics and retraumatizing leaders of the movement”.

For another NGO respondent having observed these interactions, a distance has grown between UNHCR management staff<sup>58</sup> – “mostly persons from privileged socio-economic backgrounds”, who often haven’t experienced struggles refugees face in their socio-economic inclusion (such as accessing documentation, higher education or first work experience, among other things) and the refugee populations the organization serves. This can complicate the starting orientations, priorities, and perspectives to achieve co-design in practice. An example of symbolic significance is reflected in the use of the term “PoC-Led Organizations”. The term PoC, referring to “Persons of Concern”, has been categorized as problematic and publicly challenged by refugee leaders and partners in the lead up to the 2022 UNHCR Global NGO Consultations: “When developing terminology, it is important to act collaboratively and cautiously to avoid unintentional harm”<sup>59</sup>. As a result, the term PoC was not used during the consultations and UNHCR made an institutional effort to move away from this language going forward<sup>60</sup>.

Similar to their complaints about NGOs, three RLO respondents reported that while UNHCR occasionally invites them to showcase their work or consults them to hear their recommendations, these are rarely “translated to actions” nor followed-up with explanations when recommendations are not applied. One RLO respondent also noted that compensation for participation is rarely discussed with refugee delegates prior to meetings. This trend suggests a form of cosmetic consultation: “It looks like corporate social responsibility”.

***“The policy is sent so we can reflect and comment. After commenting, participation has supposedly been done. Real participation means from A to Z, from the conception to the final decision, which is not the case actually. [...] We are consulted by UNHCR and its implementing partners but they never follow up. They need to engage us from the beginning to the end of the decision making process, and to implement our recommendation meaningfully.” - RLO respondent.***

At the global level, the lack of UNHCR’s commitment to target the most meaningful forms of refugee participation is also perceived by four respondents through what they considered as the organization’s “unequal” funding partnerships with RLOs, exemplified by the Grant Agreements with Organizations led by Displaced and Stateless people<sup>61</sup>. The Grant is designed to support “grassroots” actors with simplified reporting requirements. Other more “established” RLOs could continue, like any other organization, to apply for other funding agreements with higher amounts beyond the 4000 USD per grant or project, going through the competitive partnership process. Three respondents questioned the decision of providing only 4000 USD per grant as “it does not cover salaries, which is critical to the survival of RLOs”. “It is a very small amount of funding and only through difficult selection criteria”. While some RLO recipients of the grant fund, particularly newer RLOs, found the grant generous, others stated that “it feels like an insult” as it forces RLOs to do “huge amounts of effort for crumbs”. “The low funding limit is also counterproductive. It is meant to prove the concept that organizations can benefit from small grants even though they have limited capacity and this will perpetuate the status quo of providing limited grants to RLOs”.

Due to the small number of interviewees and narrow scope of the research, this report doesn’t claim to cover all grant recipients’ opinions. Nevertheless, respondents’ feedback echoes the statements RRLI communicated in their open letter written to UNHCR in the lead-up to the UNHCR Annual NGO Consultation in June 2022<sup>62</sup>: “Such low amounts of funding fail to increase the participation of RLOs in the refugee response sector, and in fact, could lead to further exclusion of RLOs: specifically, we are concerned that when these underfunded efforts inevitably do not demonstrate profound impact, they will be used to signal that investment in RLOs, in general, is ineffective”<sup>63</sup>. UNHCR is currently documenting the impact of the Grant Agreement with the goal of expanding its reach and advocating for increased budgetary amounts.

Two NGO respondents expressed that despite progress made on the amount of funding available and easing in eligibility criteria of the Refugee-led Innovation Fund, its process to channel funds to RLOs recreates dominant patterns within the sector, with the result that UNHCR tightly controls the funding given. Specifically, UNHCR uses “a blended funding mechanism combining a) a direct, small grant using the newly developed UNHCR grant agreement; and b) the procurement of goods and services for refugee-led organizations by UNHCR country operations and the Innovation Service”<sup>64</sup>. “Often, restricted funding means that funds are not going to salaries, rent, or other things that are considered ‘core costs’ explained the NGO respondent, “when we don’t fund core costs, work is not sustainable past a project. Refugee leaders are not compensated for their work. RLOs often do not have space to give their services, which can create safety issues, among many other things”.

Yet, UNHCR can follow models such as the Asia Pacific Network of Refugees (APNOR) Refugee Leadership Alliance, providing “core funding directly” to RLOs in the region<sup>65</sup>, or the RRLI who is supporting “smaller and newer RLOs” that can fit the “grassroot” label, and RLOs that “have an established structure and programming, as well as the ability to manage major funding” through ambitious grant models practicing unrestricted funding<sup>66</sup>.

Respondents’ observations echo prior observations on the benefits of DEI processes for organizations. Indeed, for three of the respondents, UNHCR should invest in its own internal transformation to ease its restrictions to financially support RLOs. They take the grant agreement as another example justifying how, if implemented appropriately, such an internal effort to transform UNHCR’s current systems and structures could have external benefits, with the dual effects of providing a replicable model for other groups to copy, as well as increasing trust with forcibly displaced communities.

Finally, three respondents who pledged to advocate for meaningful refugee participation at the policy level decried a perceived reluctance by UNHCR to “advocate for meaningful participation with States”. Respondents reported that UNHCR could build its recommendations on the good practices already implemented by three of its largest donor States, notably Canada, who has led by example by including a refugee advisor in their delegations to international refugee meetings and fora since the 2019 GRF. This is also the case for Germany and the United States, which have followed Canada’s practice by including refugee advisors in their UNHCR High-Level Officials Meeting delegations in December 2021, and have committed to including refugees as members of their delegations to future UNHCR meetings. UNHCR could also build on practices implemented by New Zealand, which developed in 2022 a Refugee Advisory Panel “intended to help support government decision-makers and policy developers on matters impacting refugees”<sup>67</sup>, particularly on refugee settlement strategies and policies. NGO respondents also implement good practices to foster inclusive law making with refugees, such as by developing capacity-strengthening curricula, and fact-finding missions for legislators, which can create “considerable attitude changes”. Having said this, UNHCR’s report to the 2022 ExComm meeting had significant components on the roles of refugees in leading refugee responses and advocated on specific innovations around two way capacity sharing, coordination and funding for refugee leaders<sup>68</sup>.

Two RLO respondents interpreted that UNHCR may limit the types of participation it affords and advocates for because of a reluctance to receive critical feedback or due to a fear that refugees may engage in their home country’s politics. The dual tensions of being victims versus being too active can prevent some refugee leaders from action, thus perpetuating the ‘status quo’. According to one NGO respondent, UNHCR’s emphasis on its role of protection can be conveniently used to justify these restrictive practices. It is also still in line with the lingering narrative that positions refugees as victims to be protected, as opposed to leaders able to find solutions to the problems that affect them.

In various ways, UNHCR staff at different levels from country offices to global teams have been confronted with many of the feedback and issues identified in these responses. It has been publicly recognised that more needs to be done on localization, as well as on refugees’ meaningful participation<sup>69</sup>. While plans appear to be underway with internal backing across UNHCR, including plans laid out at the beginning of this section, more could be done for UNHCR to communicate these, especially in countries of operation.

## 5.3 Solutions

### Good practices

#### *By RLOs :*

- To develop RLO-to-RLO funds, increasing contributions and redistributing them through strengthening grants up to 25 000 USD and impact growth grants from 100 000 USD to 200 000 USD. The funds are designed to address the above-mentioned issues regarding grants to RLOs, by providing multiple-year, flexible and core funding<sup>70</sup>.
- To lead by example and proactively advocate for a paradigm shift in how the sector shares power and funding.
- To advocate for the sector to understand the different degrees and streams of participation, and to co-design equitable partnerships with RLOs.

#### *By NGOs :*

- To develop a platform that showcases RLOs and connects them to international donors, networks and opportunities, so that funds are channeled to RLOs directly<sup>71</sup>.
- In call for proposals involving both NGOs and RLOs, for the NGO to no longer position itself as the lead applicant to “work with RLOs” but instead co-apply or stand behind RLO partners, and advocate for broader adoption of this practice in the sector. This will allow RLOs to produce programs from the outset and to choose their partners.

### Other proposed solutions

-> About **challenges to internal participation**

#### *For NGOs and UNHCR:*

- To develop and operationalize a toolkit or framework along with researchers with experience of forced displacement and other relevant partners to evaluate organizational transitions towards meaningful participation within the refugee response.
- To systematically report and disseminate internal progress, highlighting the variables in degrees and streams of participation, and challenges met. Strengthening transparency in all efforts can strengthen trust between refugees and governance actors.

#### *For UNHCR:*

- To support refugee participation in all streams of decision-making through meaningful recruitment of refugees :
- In high management positions: By hiring significant proportions of refugee staff in every department and supporting their upward promotions.
- In entry-level jobs: By opening paid, living-wage internships, especially for refugees who have completed training in organizations’ educational programs, and are interested in working in the humanitarian and development sector.

## -> About **challenges to external participation**

### *For NGOs:*

- To support RLOs' efforts in promoting transformative changes. As a respondent stated "If UNHCR had a counterpart, like the International Organization for Migration (IOM), that did something great in terms of meaningful participation, it might emulate aspects of that, so the goal of all organizations is to be ambassadors of sharing power".
- When there is a need for capacity-strengthening and when organizations lack the expertise to respond to the RLO's training needs, to step back or make referrals. Organizations should integrate support to RLOs in reaching out to training experts as part of their mission. This can be done through networking and by providing funding for another expert's service.

### *For UNHCR:*

- To rephrase the partnership agreements along with RLOs to create an open and fair competition between RLOs and other organizations, including provisions and specific support for RLOs' success following recognition that RLOs have special added value. This can be done via the following channels:
  - To invest financial and human resources to ensure RLOs have equitable access to become implementing partners and to receive major funding beyond an initial grant agreement.
  - To review existing grant agreements to provide unrestricted funding and to ensure
  - That RLO leaders are compensated fairly for their work and can cover other core costs
  - To simplify partnership agreements and application procedures to reduce the time and energy RLOs invest in proposals.
  - To make broad investments in RLOs by paying registration fees and to allow RLOs to develop their activities beyond obtaining partnerships with UNHCR.
  - To support RLOs' advocacy to decision-makers (donors, States, institutions of higher education, among others) around funding, legal and other systemic barriers to refugee's meaningful participation.

### *For philanthropic and institutional donors:*

- To move away from the perception of direct funding to RLOs as complicated and risky and to increase RLOs' access to direct, major, high-quality, and unrestricted funding, rather than funding organisations working with RLOs. Funding should include the chances to incorporate a capacity-strengthening component when needed. It should also use more evidence than when RLOs have established structures and programming, there should be no maximum funding limits.
- To co-design with RLOs measures and indicators appropriate to capture RLOs' successes, rather than to generate rigid requirements that are difficult for RLOs to meet.

- To resource organizations' internal transformation processes.
- To incentivise coalitions rather than competition among RLOs and between RLOs and NGOs.
- To surrender power over agenda setting in order to let refugees set priorities.

When institutional funders enact radical changes to how funding RLOs occurs, this presents a new model that can be copied by other actors, including UNHCR. As stated by an NGO respondent, the question now is, between UNHCR and institutional funders “Who could change whose minds ?”



## Conclusion

The perceptions of the main barriers to meaningful participation varies according to the actors interviewed. Among respondents, barriers include questions about refugees' impartiality, representativeness and commitment to confidentiality; refugees' skills and differences in workplace cultures; and unfavorable legislation. Other barriers identified stem from a lack of deep understanding of the ins and outs of meaningful participation within the "rest of the sector" [meaning NGOs, UNHCR, donors, and host States, among others].

This leads to large internal and external shortcomings to align stated commitments to meaningful refugees' participation and its actual implementation in the refugee response.

Internally, the practices of associating refugees in the post-ideation stages and the lack of translation of refugees' recommendations into action are pitfalls that are present even among NGOs at the forefront of the meaningful participation movement. The slowness by organizations to address these gaps may be due to endemic issues, such as stereotyping, an anxiety or an unwillingness to address systemic inequalities and cede power to refugees and RLOs, a lack of knowledge on what meaningful participation is and how it unfolds among organizations' workforce, or national regulatory challenges. UNHCR and NGOs all condemn these barriers, but they still interfere with the interviewed pledge-makers' efforts to achieve meaningful refugee participation. Externally, the effects are also visible in partnerships and programs developed to support RLOs, which can often include patronizing behaviors while not addressing issues holistically nor proposing transformative opportunities or system change.

Changing this dynamic should acknowledge that creating strategies for meaningful participation without meaningful participation at the time of strategy design is self-defeating. Meaningful participation should be done through all steps of decision-making, and begin at the onset to embody its essence as a right and to achieve its mission of making humanitarian assistance more effective. The whole sector should, along with refugee actors and RLOs, begin to think about how to define, defend, resource and engage healthy and sustained participation, where refugees do not inspire organizations but lead the generation of new solutions.

For solutions to be impactful, we argue that refugees must co-own the decision-making processes on any program within the refugee response. This does not mean unanimity will be reached throughout, nor does it mean all parties will be fully satisfied with the final outcome. It would, however, be an outcome that results from the equitable participation of all and where everyone would have accessed equal levels of decision-making power. This will be the only way for meaningful participation as a right to truly make change, to avoid the problems that persist when only outsiders try to fix problems, and to deliver high quality services to refugees.



## Footnotes

1. Global Refugee-led Network, European Coalition of Migrants and Refugees, New Women Connectors, Oxfam. 2022. Beyond Consultation, Unpacking the Most Essential Components of Meaningful Participation by Refugee Leaders, pp.7-8, figure 1. <https://oxfamilibrary.openrepository.com/bitstream/handle/10546/621363/bp-beyond-consultation-participation-refugee-leaders-310322-en.pdf>
2. UNHCR. 2019. Global Compact Digital Platform. What are pledges <https://globalcompactrefugees.org/article/what-are-pledges>
3. Local Engagement Refugee Research Network, Refugee Studies Center, Center for Lebanese Studies. 2022. Evaluation of Refugee-Led Organizations in East Africa and the Middle East. <https://carleton.ca/lerrn/lerrn-rsc-clc-evaluation-of-rlos/>
4. Abis Getachew, Mary Gitahi, Andira Yousif Kara, Uwezo Ramazani. 2022. 'Refugee-Led Organisations in East Africa: Community Perceptions in Kenya, Uganda, Ethiopia and Tanzania.' Refugee-Led Research Series, Research Report (1), September 2022
5. Asylum Access. Who We Are, Refugee Leadership. <https://asylumaccess.org/who-we-are/refugee-leadership/>
6. Resourcing Refugee Leadership Initiative, Who We Are. <https://www.refugeeslead.org/who-we-are>
7. Asylum Access. 2021. New Position Paper, Building Equitable Partnerships <https://asylumaccess.org/new-position-paper-building-equitable-partnerships/>
8. Asylum Access, Resourcing Refugee Leadership. 2021. Evidence Base for the Impact and Importance of Refugee-Led Organizations. Asylum Access. <https://www.resourcingrlos.org/evidence;>
- Alexander Betts, Evan Easton-Calabria, and Kate Pincock. 2020. Refugee-led Organisations: Collective Action for Collective Assistance. Last Modified 09/17/2020. <https://www.rethinkingrefuge.org/articles/collective-action-for-collective-protection-refugees-as-providers-of-humanity>.
9. Patrick Chandiga Justine. 2020. Refugee-led Responses to COVID-19: A case study from Uganda. Oxford Refugee Studies Center. <https://www.rethinkingrefuge.org/articles/recognizing-the-role-of-refugee-led-organizations-in-responding-to-covid-19;>
- Robert Hakiza,, Alexander Betts, Evan Easton-Calabria, and Kate Pincock. Refugee Groups Fill Gaps in COVID-19 Response, and they Need Support. 2020. The New Humanitarian. Last Modified April 29, 2020. [https://www.un.org/africarenewal/magazine/december-2018-march-2019/uganda-stands-out-refugees-hospitality;](https://www.un.org/africarenewal/magazine/december-2018-march-2019/uganda-stands-out-refugees-hospitality)
- Mustafa Alio, Shaza Alrihawi, James Milner, Anila Noor, Najeeba Wazefadost, Pascal Zigashane. 2020. By Refugees, For Refugees: Refugee Leadership During COVID-19 and Beyond. Forced Migration Review 64: 76-78. <https://www.fmreview.org/issue64/alio-alrihawi-milner-noor-wazefadost-zigashane>
- Christa Kuntzelman and Robert Hakiza. 2021. Forging a New Path, RLOs as Partners: Lessons from the Africa Refugee Leaders' Summit. UNHCR. [https://www.unhcr.org/people-forced-to-flee-book/wp-content/uploads/sites/137/2021/10/Christa-Kuntzelman-and-Robert-Hakiza\\_Forging-a-new-path-RLOs-as-Partners-Lessons-from-the-Africa-Refugee-Leaders-Summit.pdf;](https://www.unhcr.org/people-forced-to-flee-book/wp-content/uploads/sites/137/2021/10/Christa-Kuntzelman-and-Robert-Hakiza_Forging-a-new-path-RLOs-as-Partners-Lessons-from-the-Africa-Refugee-Leaders-Summit.pdf)
- Refugee Studies Center. 2020. Strengthening Refugee-Led Humanitarian Response During the COVID-19 Pandemic. RSC Public Seminar Series. <https://www.rsc.ox.ac.uk/news/rsc-public-seminar-series-trinity-term-2020>.
10. Refugee-Led Action in Response to COVID-19. Refugees Lead. NeedsList. <https://community.needslist.co/RefugeesLead>
11. Fiona Smyth, Head of Humanitarian Campaigns and Advocacy, Oxfam International, quoted in: Amnesty International. 2020. Refugee-led organizations need support to continue their vital work. <https://www.amnesty.org/en/latest/news/2020/08/refugee-led-organizations-osf-asylum-access/>

12. Refugees Seeking Equal Access at the Table. 2021. Press Release. <https://twitter.com/RefugeesSeat/status/1470773544711860230>

13. As cited in UNHCR Innovation Service. 2019. REFLECTIONS Explorations in Inclusion, Diversity, Gender Equity and Innovation in UNHCR. <https://www.unhcr.org/innovation/inclusion/>

14. Barbelet, Veronique. 2018. As local as possible, as international as necessary. Humanitarian Policy Group Working Paper. <https://odi.org/en/publications/as-local-as-possible-as-international-as-necessary-understanding-capacity-and-complementarity-in-h>

Tristen Harley. 2021. Refugee Participation Revisited: The Contributions of Refugees to Early International Refugee Law and Policy. *Refugee Survey Quarterly* 40: 58-81. [https://www.unhcr.org/people-forced-to-flee-book/wp-content/uploads/sites/137/2021/10/Tristan-Harley\\_Refugee-Participation-Revisit](https://www.unhcr.org/people-forced-to-flee-book/wp-content/uploads/sites/137/2021/10/Tristan-Harley_Refugee-Participation-Revisit)

15. Tristan Harley and Harry Hobbs. 2020. The Meaningful Participation of Refugees in Decision-Making Processes: Questions of Law and Policy. *International Journal of Refugee Law* 32, no. 2: 200-226. <https://academic.oup.com/ijrl/article-abstract/32/2/200/5834352?redirectedFrom=fulltext>

Shaza Alrihawi, Anila Noor, John Bolingo Ntahira, Najeeba Wazefadost and Christa Kuntzelman. 2021. Power and the Margins: The State of Refugee Participation. The Global Refugee-Led Network's Recommendations for the 2021 UNHCR High-Level Officials Meeting. <https://wrmcouncil.org/publications/report/power-the-margins-the-state-of-refugee-participation/>

Hayley Drozdowski and Mark Yarnell. 2019. Promoting Refugee Participation in the Global Refugee Forum: Walking the Walk. Refugees International. <https://www.refugeesinternational.org/reports/2019/7/11/promoting-meaningful-participation-in-the-global-refugee-forum-walking-the->

James Milner. 2021. The Politics and Practice of Refugee Participation in the Governance of the Global Refugee Regime. Canadian Political Science Association Annual Conference: Diversity and the Discipline of Political Science. <https://carleton.ca/lerrn/wp-content/uploads/Milner-CPSA-paper-refugee-participation-May-2021.pdf>.

16. Cohere. 2022. Introducing... Cohere. <https://news.wearecohere.org/post/we-are-cohere/>

17. James Milner, Mustafa Alio, Rêz Gardî. 2022. Meaningful Refugee Participation: An Emerging Norm in the Global Refugee Regime, *Refugee Survey Quarterly*, hdac007. <https://doi.org/10.1093/rsq/hdac007>

18. Andrew Gary Darwin Holmes. 2020. Researcher Positionality - A Consideration of Its Influence and Place. *Qualitative Research, International Journal of Education*, 8(4), 2020;

Katie Kirsletter. 2012. Insider, Outsider or Somewhere in Between: The Impact of Researchers' Identities on the Community-based Research Process, *Journal of Rural Social Sciences*, 27(2);

Robina Mohammad. 2001. "Insiders and/or Outsiders: Positionality, Theory and Praxis", in M. Limb & C. Dwyer (eds.), *Qualitative Methods for Geographers: Issues and Debates*, Oxford, Oxford University Press;

Wendy. E. Rowe. 2014. Positionality. in D. Coglan & M. Brydon-Miller (eds.), *The Sage Encyclopedia of Action Research*.

19. UNHCR Global Compact Digital Platform. What are pledges ? <https://globalcompactrefugees.org/article/what-are-pledges>

20. To encourage actors to play a role in advancing meaningful refugee participation, and to provide guidelines on how to achieve this, the GRN issued the "refugee participation pledge". The GRN's guidelines advance participation at local, national and international level, and were developed through regional consultation processes hosted by the GRN in Asia, Africa, the Middle-East, North Africa and Europe.

See more at : GRN. 2021. Meaningful Refugee Participation as Transformative Leadership: Guidelines for Concrete Action. [https://www.globalrefugeenetwork.org/images/downloads/meaningful-refugee-participation-guidelines\\_web.pdf](https://www.globalrefugeenetwork.org/images/downloads/meaningful-refugee-participation-guidelines_web.pdf)

GRN. 2021. Press Release: Refugees Call on World Leaders to Pass the Mic at the Two-Year Review of the Global Compact on Refugees. <https://www.globalrefugeenetwork.org/index.php/en/publications-and-news/press-statements> (last visited 21 Dec. 2021).

21. Statistics gained from the UNHCR dashboard as on 23.12.21.

Full pledge database (accessed 01 July 2022) <https://globalcompactrefugees.org/channel/pledges-contributions>,

22. See Annexe 1 - List of pledge IDs referring to meaningful participation. The identification of the refugee participation pledge was conducted by searching for name contributions referring to meaningful participation, but also by using keywords related to meaningful participation in the pledge descriptions.

23. This highlights the added value of establishing internal informational flow channels on organizations' implementation of meaningful participation.

24. See Annexe 2 - List of interview questions.

25. We label "commitments" to identify the action items pledge makers described in the pledge database. A pledge generally included various commitments.

26. Roger. A. Hart. 1992. Children's Participation: From Tokenism to Citizenship. UNICEF Innocenti Essays No. 4, p.8. [https://www.unicefirc.org/publications/pdf/childrens\\_participation.pdf](https://www.unicefirc.org/publications/pdf/childrens_participation.pdf).

See also Lisa. M. Vaughn and Farrah Jacquez. 2020. Participatory Research Methods – Choice Points in the Research Process. *Journal of Participatory Research Methods* 1(1). <https://doi.org/10.35844/001c.13244>

27. This corresponds to the terminology employed by Asylum Access in prior work.

28. GRN. 2019. Meaningful Refugee Participation as Transformative Leadership: Guidelines for Concrete Action, p. 7.

See also GRN, EU-COMAR, NWC, Oxfam. 2022. *Beyond Consultation, Unpacking the Most Essential Components of Meaningful Participation by Refugee Leaders*, op.cit., p.5.

29. James Milner. 2021. speaking at the roundtable discussion Meaningful Refugee Participation: Critical Reflections & Ackwards Conversations in the Global Refugee Regime, Canadian Association for Refugee and Forced Migration Studies (CARFMS). <https://www.youtube.com/watch?v=PrEhsRruZ30>

30. Liisa Malkki. 1995. Purity and Exile: Violence, Memory, and National Cosmology Among Hutu Refugees in Tanzania. Chicago: University of Chicago Press.

Liisa Malkki. 1996. Speechless Emissaries: Refugees, Humanitarianism, and Dehistoricization. *Cultural Anthropology* 11 (3): 377-404.

Sophia Rainbird. 2011. Asylum Seeker 'Vulnerability': The Official Explanation of Service Providers and the Emotive Responses of Asylum Seekers. *Community Development Journal* (Oxford) 3 (1): 17.

31. Mohamed Duale. 2020. To be a Refugee, it's Like to be Without your Arms, Legs: A Narrative Inquiry into Refugee Participation in Kakuma Refugee Camp and Nairobi, Kenya, LERRN Paper No. 7, p.5. <https://carleton.ca/lerrn/wp-content/uploads/LERRN-Working-Paper-No.-7-Refugee-Participation-Kenya.pdf>

32. UNHCR. 2018. UNHCR Policy on Age, Gender and Diversity. <https://www.unhcr.org/5aa13c0c7.pdf>

33. Sana Mustafa speaking at the Kaldor Center Conference. 2022. Catalyzing meaningful refugee participation: Next steps and ongoing challenges <https://www.youtube.com/watch?v=wEo2CYwKQ0Q> (59.12mn)

34. Véronique Barbelet 2019. Rethinking Capacity and Complementarity for a More Local Humanitarian Action. Humanitarian Policy Group Report. Overseas Development Institute. <https://cdn.odi.org/media/documents/12957.pdf>

35. White Dominant Culture & Something Different, a worksheet, adapted for ACCE from adaptation by Partners for Collaborative Change based on "White Supremacy Culture", Tema Okun and Kenneth Jones, <https://www.cacgrants.org/assets/ce/Documents/2019/WhiteDominantCulture.pdf>

36. Resourcing Refugee Leadership Initiative, Who We Are. <https://www.refugeeslead.org/who-we-are>

37. Resourcing Refugee Leadership Initiative, Apply for a Grant. <https://www.refugeeslead.org/apply>

38. Impact Report. 2022. Resourcing Refugee Leadership Initiative. [https://www.refugeeslead.org/\\_files/ugd/3caee8\\_0acfd563d4e24f34a1a1fdb1251c542.pdf](https://www.refugeeslead.org/_files/ugd/3caee8_0acfd563d4e24f34a1a1fdb1251c542.pdf)

39. Alexander Betts. 2021. *The Wealth of Refugees: How Displaced People can Build Economies*. Oxford

University Press.

Roger Zetter and Héloïse Ruaudel. 2016. "Refugees' Rights to Work and Access to Labor Market-- An Assessment-- Country Case Studies (Part 2).  
<https://www.knomad.org/publication/refugees-right-work-and-access-labor-markets-assessment-country-case-studies-part-2>

40. Alexander Betts. 2021. The Wealth of Refugees.

41. Grassroot Leadership Organizations (GLO), Uganda. Reframe. [https://reframe.network/rlo/Grassroot%20Leadership%20Organizations%20\(GLOs\)](https://reframe.network/rlo/Grassroot%20Leadership%20Organizations%20(GLOs))

42. See Refugee-Led Innovation Fund website at: <https://www.unhcr.org/innovation/refugee-led-innovation-fund/>

43. The Resourcing Refugee Leadership Initiative. 2022. An open letter to UNHCR, Five ways to Foster Refugee Leadership and Localization. <https://www.refugeeslead.org/unhcr-open-letter>

44. See The Resourcing Refugee Leadership Initiative website. 2020. Apply for a Grant, About the RLO-to-RLO fund page, section The fund's approaches and values. <https://www.refugeeslead.org/apply>

45. Mohamed Duale. 2020. To be a Refugee, it's Like to be Without your Arms, Legs": A Narrative Inquiry into Refugee Participation in Kakuma Refugee Camp and Nairobi, Kenya, LERRN Paper No. 7, op.cit.,p.16. <https://carleton.ca/lerrn/wp-content/uploads/LERRN-Working-Paper-No.-7-Refugee-Participation-Kenya.pdf>

46. James Milner. 2022. Speaking at James Milner on Refugee Participation and the Governance of the Refugee Regime, (Un)filtered, Rêz Gardi. <https://player.whooshkaa.com/unfiltered?episode=898774>

47. UNHCR. 2022. UNHCR's Task Team on Engagement and Partnership with Organisations led by Forcibly Displaced and Stateless People Briefing Note. p.2. <https://www.unhcr.org/publications/brochures/61b28b094/unhcrs-task-team-engagement-partnership-persons-concern-led-organizations.html>.

48. Ibid. p.2.

49. Ibid. p.3.

50. UNHCR. 2021. Refugee-led Innovation Fund: "Patient Capital" to Develop Refugee Initiatives. <https://globalcompactrefugees.org/refugee-led-innovation-fund-patient-capital-develop-refugee-initiatives>

51. Resourcing Refugee Leadership Initiative. 2022. Impact Report. pp.26-27. [https://www.refugeeslead.org/\\_files/ugd/3caee8\\_0acfd563d4e24f34a1a1fdb1251c542.pdf](https://www.refugeeslead.org/_files/ugd/3caee8_0acfd563d4e24f34a1a1fdb1251c542.pdf)

52. UNHCR. UNHCR NGO Innovation Award 2020. Refugee-led Organizations in the COVID-19 Response <https://www.unhcr.org/innovation/unhcr-ngo-innovation-award-2020/#:~:text=The%20Award%202020,regional%2C%20national%20and%20local%20levels.>

53. UNHCR. 2022. UNHCR Grant Agreements with Organizations led by displaced and stateless people. p.2. <https://www.unhcr.org/publications/brochures/61b28c784/unhcr-grant-agreements-organizations-led-persons-concern-poc-briefing-note.html>

54. UNHCR.2022. Information repository for Organizations led by Forcibly Displaced and Stateless People. <https://data.unhcr.org/en/situations/repository-organisations-led-by-forcibly-displaced-and-stateless>

55. UNHCR. Participation & Engagement with Organizations led by Forcibly Displaced and Stateless Persons <https://globalcompactrefugees.org/compact-action/participation-engagement-organizations-led-forcibly-displaced-and-stateless-persons>

56. UNHCR. 2021. Progress Toward implementing the Grand Bargain Commitment, Executive Committee of the High Commissioner's Programme, Standing Committee 82nd meeting, p.6. <https://www.unhcr.org/6142cd254.pdf>

57. UNHCR. 2022. Twitter "Mohamed knows that a few simple questions can mean the difference between hope and despair for people who have just fled their homes. He is one of the many colleagues working at UNHCR who have personal experience with forced displacement. <https://twitter.com/Refugees/status/1561627744466771968>

58. UNHCR has a rotation system in place, and a vast majority of staff are based in diverse country operations in different regions, and it is necessary to enter UNHCR at a junior level to progress towards senior management positions.

59. APNOR, R-SEAT, GRN, Act for Peace. 2022. Use of the term : Persons of Concern-led Organizations. <https://twitter.com/APNORRefugees/status/1532559928053100544/photo/1>

60. Resourcing Refugee Leadership Initiative. 2022. Impact Report. p27. [https://www.refugeeslead.org/\\_files/ugd/3caee8\\_0acfd563d4e24f34a1a1fdb1251c542.pdf](https://www.refugeeslead.org/_files/ugd/3caee8_0acfd563d4e24f34a1a1fdb1251c542.pdf)

61. UNHCR. 2022. Grant Agreements with Organizations led by Displaced and Stateless People - Briefing Note. <https://www.unhcr.org/publications/brochures/61b28c784/unhcr-grant-agreements-organizations-led-persons-concern-poc-briefing-note.html>

62. The Resourcing Refugee Leadership Initiative. 2022. An Open Letter to UNHCR, Five Ways to Foster Refugee Leadership and Localization, op.cit. <https://www.refugeeslead.org/unhcr-open-letter>

63. The Resourcing Refugee Leadership Initiative. 2022. An Open Letter to UNHCR, Five Ways to Foster Refugee Leadership and Localization. <https://www.refugeeslead.org/unhcr-open-letter>

64. UNHCR.Refugee-led Innovation Fund. 2021. Patient Capital to Develop Refugee Initiatives, op.cit.,p.5. <https://globalcompactrefugees.org/refugee-led-innovation-fund-patient-capital-develop-refugee-initiatives>.

65. See APNOR website. Refugee Leadership Alliance Pooled Pilot Fund. <https://apnor.org/refugee-leadership-alliance/refugee-leadership-alliance-pooled-pilot-fund/>

66. See The Resourcing Refugee Leadership Initiative website.(2020. Apply for a Grant, About the RLO-to-RLO fund, the Fund's Approaches and Values. <https://www.refugeeslead.org/apply>

67. New Zealand Immigration. 2022. Refugee Advisory Panel. <https://www.immigration.govt.nz/about-us/what-we-do/refugee-advisory-panel>

68. UNHCR, ICVA. 2022. Speech to UNHCR Executive Committee. Localization & Climate Action. Reporting from the 2022 UNHCR Consultations with NGOs. [https://www.icvanetwork.org/uploads/2022/10/Reporting\\_UNHCR\\_NGO\\_Global\\_Consultations\\_ExCom\\_2022.pdf](https://www.icvanetwork.org/uploads/2022/10/Reporting_UNHCR_NGO_Global_Consultations_ExCom_2022.pdf)

69. UNHCR. 2022. Localization and Climate Action. UNHCR Global Consultations with Non-Governmental Organizations (NGOs) Geneva and online, 7-10 June 2022, Concept Note [www.unhcr.org/62348ae54.pdf](http://www.unhcr.org/62348ae54.pdf)

70. Ibid.

71. See the Reframe website <https://www.reframe.network>.

## Annexe 1 - List of pledges referring to meaningful refugee participation in the 23.12.2021 UNHCR pledge database

<b>Pledge ID</b>	<b>Submission entity</b>
<b>GRF-00013</b>	Act for Peace
<b>GRF-00014</b>	Act for Peace
<b>GRF-00038</b>	Lebanon Research and Policy Network on Displacement/ Issam Fares Institute for Public Policy and International Affairs
<b>GRF-00044</b>	Asia Pacific Refugee Rights Network (APRRN) APNOR
<b>GRF-00057</b>	Asylum Access
<b>GRF-00058</b>	Asylum Access Mexico
<b>GRF-00059</b>	Asylum Access Thailand
<b>GRF-00062</b>	Asylum Access
<b>GRF-00087</b>	CARE International
<b>GRF-00088</b>	CARE International
<b>GRF-00147</b>	The Danish GCR Coalition
<b>GRF-00165</b>	Destination Unknown, a campaigning network led by Terre des Hommes
<b>GRF-00236</b>	Forced Migration Research Network, UNSW, Sydney, Australia
<b>GRF-00287</b>	Government of Australia
<b>GRF-00322</b>	Global Refugee Led Network
<b>GRF-00334</b>	Global Youth Advisory Council (GYAC)
<b>GRF-00381</b>	Government of Canada
<b>GRF-00439</b>	Government of Cyprus
<b>GRF-00531</b>	Government of France
<b>GRF-00553</b>	Government of Germany
<b>GRF-00629</b>	Government of Honduras
<b>GRF-00889</b>	Government of Portugal
<b>GRF-00897</b>	Government of Portugal
<b>GRF-00128</b>	Clifford Chance
<b>GRF-01062</b>	Greek Forum of Refugees
<b>GRF-01082</b>	International Disability Alliance
<b>GRF-01167</b>	Sameskies
<b>GRF-01400</b>	The Danish GCR Coalition
<b>GRF-01226</b>	Refugee Council of Lithuania
<b>GRF-01228</b>	Multicultural Youth Advocacy Network (MYAN)
<b>GRF-01237</b>	Office of the Special Representative of the Secretary-General on Violence Against Children
<b>GRF-01254</b>	Organization for Security and Cooperation in Europe (Office for Democratic Institutions and Human Rights - ODIHR)
<b>GRF-01265</b>	Oxfam International
<b>GRF-01264</b>	The Danish GCR Coalition
<b>GRF-01304</b>	PlanBørnefonden Denmark
<b>GRF-01312</b>	Refugee Consortium of Kenya
<b>GRF-01319</b>	Refugee Solidarity Network
<b>GRF-01341</b>	RET International
<b>GRF-01353</b>	Settlement Services International (SSI)
<b>GRF-01381</b>	St. Andrew's Refugee Services
<b>GRF-01393</b>	The Danish GCR Coalition (Oxfam IBIS)
<b>GRF-01407</b>	The Danish GCR Coalition
<b>GRF-01430</b>	UN SRSG on Violence Against Children
<b>GRF-01467</b>	Urban Refugees
<b>GRF-01480</b>	World University Service of Canada (WUSC)
<b>GRF-01493</b>	Xavier Project
<b>GRF-01471</b>	World Food Programme (WFP)
<b>GRF-01591</b>	League of Tolerance
<b>GRF-01601</b>	Yoga and Sport with Refugees
<b>GRF-01829</b>	Government of the United States of America

## Annexe 2 - List of questions asked to respondents

Do you want to anonymize your contribution?

### **Defining refugee meaningful participation:**

- What is your organization's definition of refugee meaningful participation ?
- Has your organization developed this definition or did it refer to a pre-existing definition such as the NEAR network, the Core Humanitarian Standards (CHS) Alliance or the Inter Agency Standing Committee (IASC)?
- Why is your organization pushing for meaningful participation? What are the motivations ?
- What is your organization's final ambition for meaningful participation ?
- Does your organization have indicators to measure refugees' meaningful participation ? When your organization drafted them, did it refer to any pre-existing framework ?
- Do you consider that the way your organization works embraces its definition of refugee meaningful participation ?

### **Barriers to the pledge:**

- What aspects of the pledge for meaningful participation your organization is underperforming ?
- What were the challenges your organization met to implementing the commitments listed in your pledge ?
- What solutions does your organization have or could have put in place to overcome these challenges ?

### **Solutions to barriers met by peer organizations:**

- A number of respondents mentioned a challenge linked to refugees' impartiality, representativeness and commitment to confidentiality, refugees' skills and differences in workplace cultures; unfavorable legislations, a lack of deep understanding of the ins and outs of meaningful participation within the "rest of the sector. What is your interpretation of this challenge and what solutions would you suggest to overcome it ?

### **Other:**

To what extent and in which ways has implementing your pledge contributed to changes in the effectiveness of your organization's response?